Project Bruin at the Sakioka Farms Business Park Consistency Checklist

Prepared for:
City of Oxnard
214 South C Street
Oxnard, California 93030

Prepared by:
Rincon Consultants, Inc.
180 Ashwood Avenue
Ventura, California 93003

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Acronyms & Abbreviations

ACLUP	Airport Comprehensive Land Use Plan
AQMP	Air Quality Management Plan
BMP	best management practice
BRP	Business Research Parks
CalEEMod	California Emissions Estimator Model
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
cf	Cubic Feet
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
ETPZ	Extended Traffic Pattern Zone
FEIR	Final Environmental Impact Report
GHG	Greenhouse Gas
ILT	Light Industrial
kWh	Kilowatt Hours
LOS	Level of Service
M-1	Light Manufacturing
ML	Limited Manufacturing
RWQCB	Regional Water Quality Control Board
SQUIMP	Stormwater Quality Urban Impact Mitigation Management Plan
TGM	Technical Guidance Manual
TTM	Tentative Tract Map
USACE	United States Army Corps of Engineers
US-101	U.S. Highway 101
VCAPCD	Ventura County Air Pollution Control District
VMT	Vehicle Miles Traveled
WSA	Water Supply Assessment

Section 1: Introduction

Sakioka Farms Business Park Specific Plan (Specific Plan) is a 430-acre specific plan that would develop up to 8.5 million square feet (sf) of commercial, business research, and light industrial uses between Rice Avenue, U.S. Highway 101 (US 101), and Del Norte Boulevard, in Oxnard, California. In 2012, the City of Oxnard (City) prepared an Environmental Impact Report (EIR), an Adaptive Management Mitigation Monitoring and Reporting Program, and a Statement of Overriding Consideration for the Specific Plan (State Clearinghouse No. 2002071070) pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, et seq.). The Notice of Determination was filed with the State on June 18, 2012.

Project Bruin at The Sakioka Farms Business Park (project) involves the proposed development of a two-story, e-commerce fulfillment facility on an approximately 64.65-acre site within Area 5 of the 430-acre Specific Plan area. This environmental consistency evaluation was prepared to determine if the Specific Plan EIR addressed the potential environmental effects of the project adequately or whether supplemental or subsequent environmental documentation or technical studies are needed. Specifically, this environmental checklist compares the environmental effects of the proposed project with the environmental effects identified in the Specific Plan EIR, as the proposed project constitutes development pursuant to the provisions in the Specific Plan.

1.1 Location

The Specific Plan area is in northeastern Oxnard, Ventura County, south of US 101, east of Rice Avenue, and north of Latigo Avenue. Del Norte Boulevard bisects the easternmost part of the site. Gonzalez Road terminates along the western perimeter of the site. Figure 1 shows the site in its regional context; Figure 2 provides a view of the Specific Plan site.

The proposed project would occupy 64.65 acres in the southeastern quadrant of the Specific Plan area (Figure 3). The project site would be served by a circulation system consisting of the freeway, arterial and collector streets, and roads on the project site. The primary internal east-west roads are Gonzales Road and Sakioka Drive and the site is bound by two north-south streets, Del Norte Boulevard on the east and Rice Avenue on the west.

Figure 1. Regional Location

Figure 2. Specific Plan Area Location

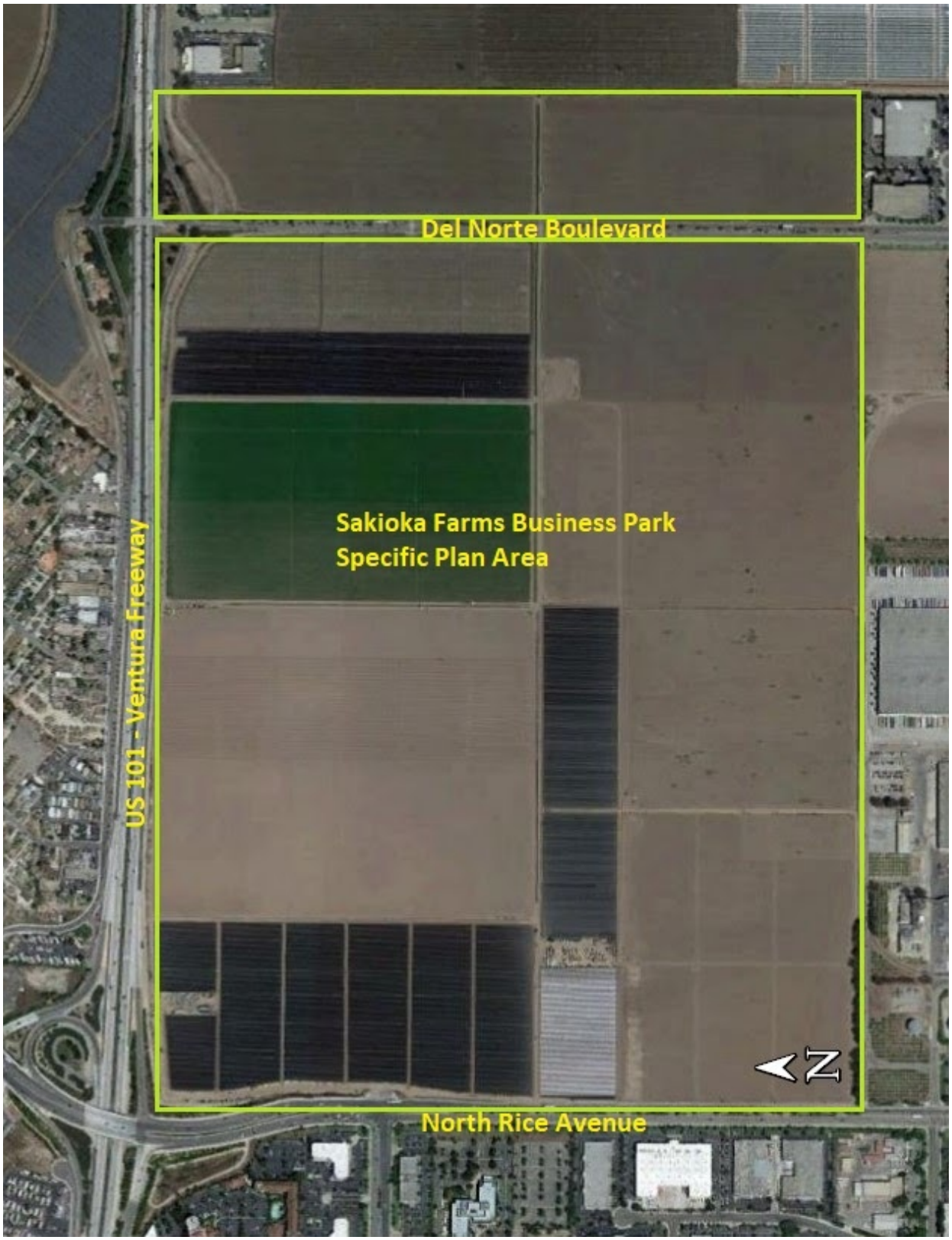
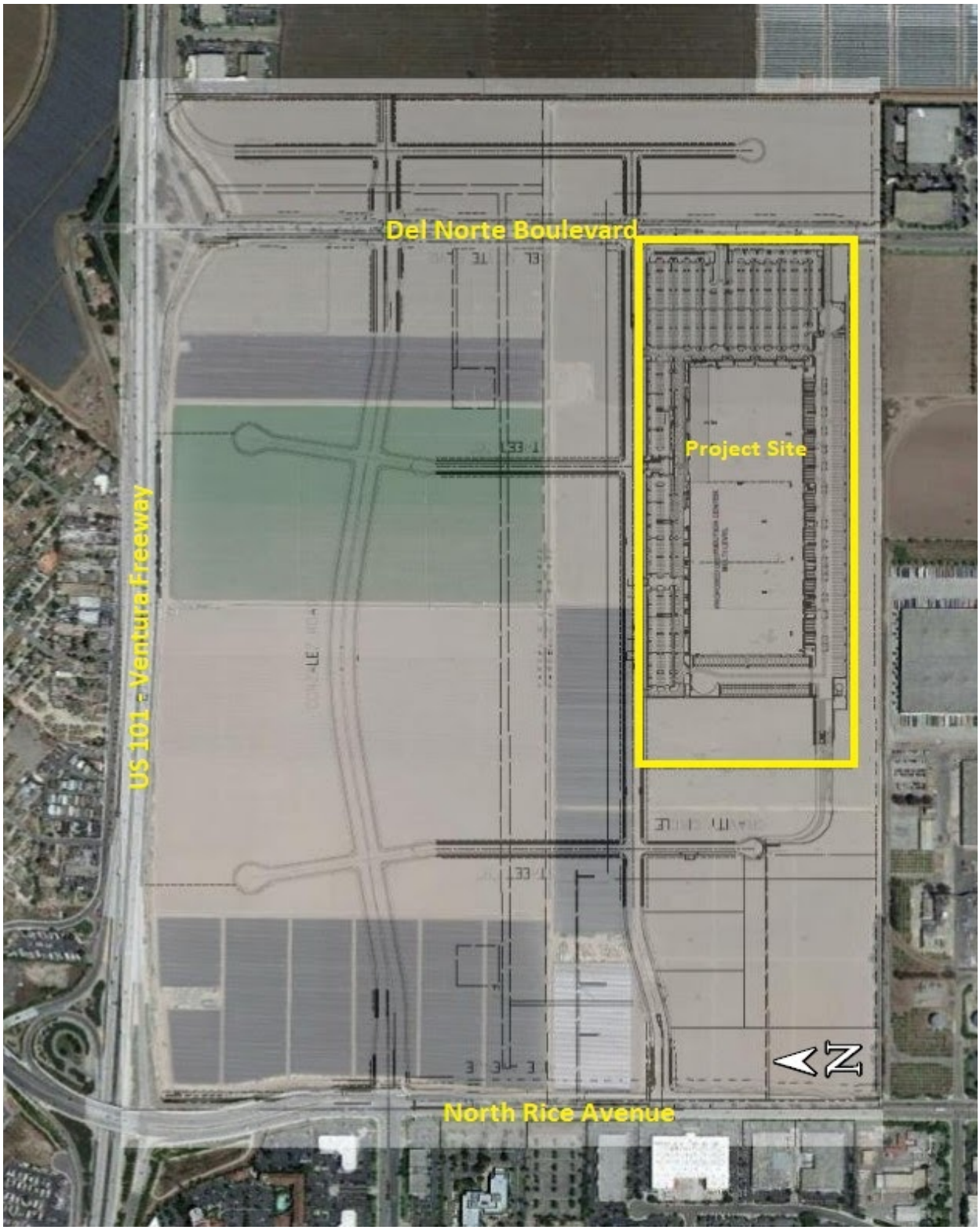


Figure 3. Project Site Area within the Specific Plan Area



1.2 Environmental Setting

The Specific Plan area is the largest undeveloped site that remains in Oxnard. It is currently used for agricultural production and a few agriculture-related structures and equipment are still in place on the site. The agricultural fields have historically been used to grow strawberries, celery, cabbage, lettuce, and peppers.

According to the City of Oxnard 2030 General Plan, the land use designation for the northern portion of the Specific Plan area is Business Research Parks (BRP) and the designation for the southern portion of the Specific Plan area is Light Industrial (ILT) (see Figure 4). The surrounding land use designations include Agricultural to the east and ILT to the south. Land designated as BRP is adjacent to the northwestern portion of the Specific Plan area and the area to the west is primarily ILT and Limited Industrial (Figure 5). Adjacent industrial uses include the Procter & Gamble Paper Products Company and a Ventura County Fire Department support complex. Figure 4 shows a land use map with General Plan land use designations and the project site boundaries outlined in black. A mixed-use residential/ commercial development is north of the US 101, adjacent to the Rice Avenue/Santa Clara Street interchange. A large tract of farmland is situated northeast of the US 101-Del Norte Boulevard interchange.

Figure 5 shows the zoning for the Specific Plan area. The northern portion of the Specific Plan area is zoned BRP, where the site parallels US 101, between Rice Avenue and Del Norte Boulevard; the rest of the Specific Plan area is zoned Light Manufacturing (M-1). The area immediately to the east is zoned for manufacturing (Light Manufacturing, Limited Manufacturing, and BRP). South of the Specific Plan, the area is zoned Light Manufacturing. The rest of the surrounding area is primarily under the jurisdiction of the County of Ventura, with some commercial zoning across US 101 from the Specific Plan.

Topographically, the agricultural fields that make up the project site are relatively flat. This land surface drains generally from northwest to the southeast at a slope of 0.25 percent. Two unlined, earthen channels traverse the site from west to east and collect drainage. These channels join another unlined earthen channel that runs through the site from north to south and conveys the flows from the site and from off site to an existing, concrete-lined, trapezoidal channel (Sturgis Road Drain) near the southeast corner of the Specific Plan area. The remnants of defunct railroad tracks also parallel the project site, beside the Sturgis Road Drain, until they curve into the adjacent agri-industrial use. Also, in a northeasterly direction of the US-101, the Beardsley Wash and the Nyeland Drain join the Revolon Slough, a County of Ventura Flood Control District channel that runs in a southerly direction east of the Sakioka Farms Specific Plan area.

Figure 4. General Plan Land Use Designations

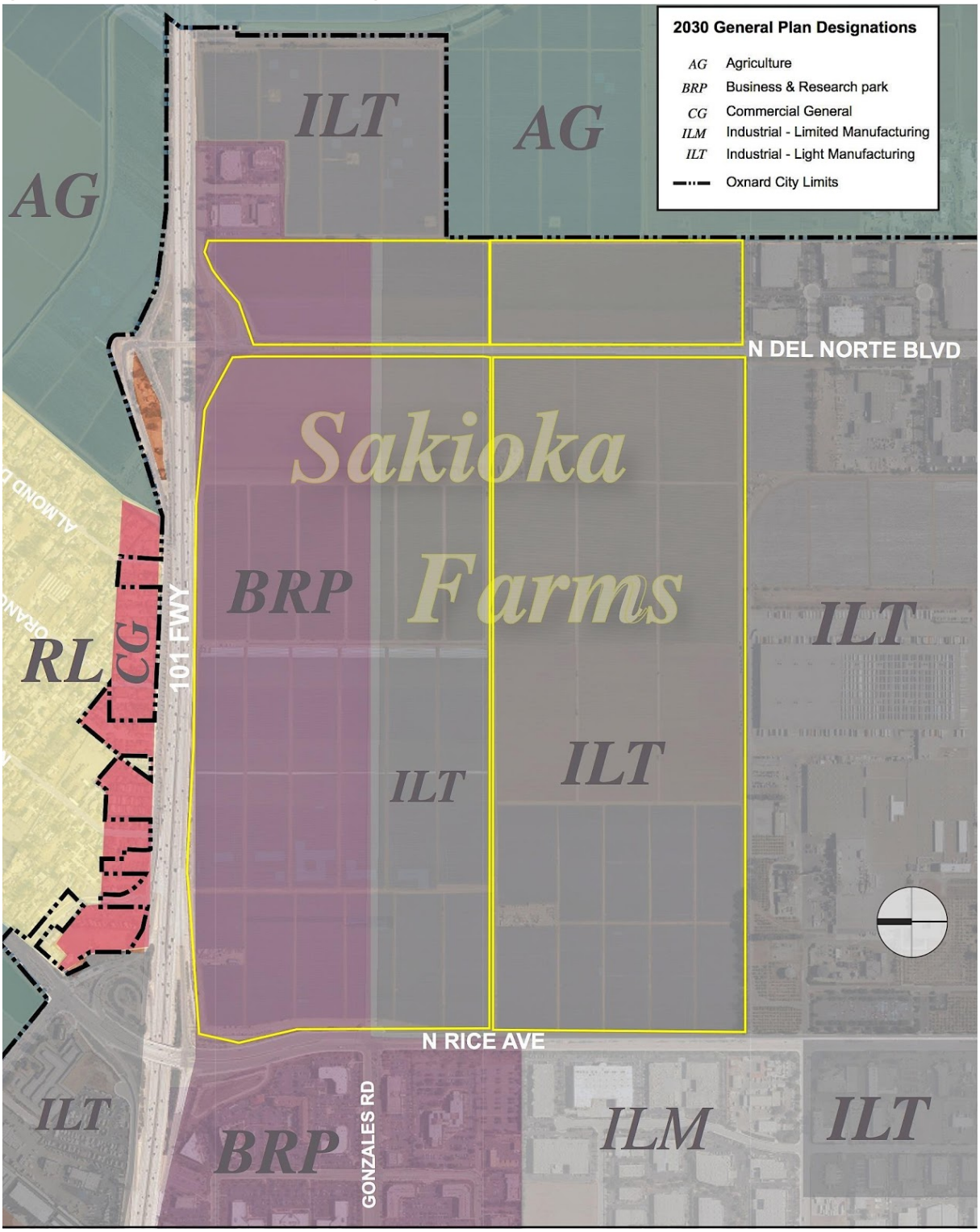
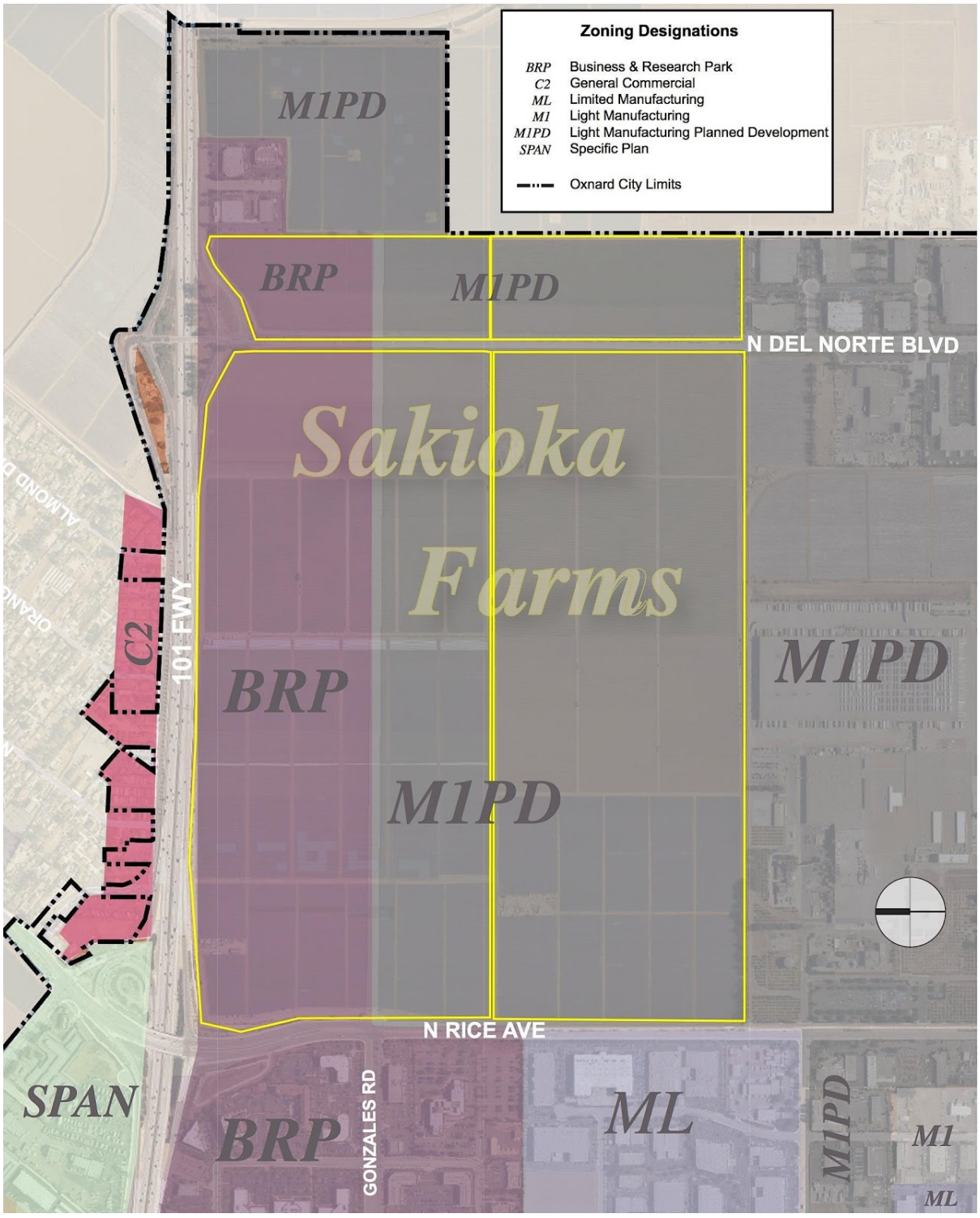


Figure 5. Zoning Designations



1.3 Background

Oxnard 2030 General Plan

The Specific Plan site is in Oxnard and is consistent with the municipal zoning and the land uses indicated in the City's 2030 General Plan. The 2030 General Plan was adopted in October 2011, with updates and amendments occurring through 2016 (City of Oxnard 2016). The City certified the Oxnard 2030 General Plan Final Programmatic EIR (General Plan EIR) in 2011 (City of Oxnard 2011a). The General Plan EIR provides a high-level environmental review of the 2030 General Plan, including development of the Specific Plan area.

The General Plan EIR concludes that implementation of the 2030 General Plan would have significant, unavoidable impacts on the CEQA issue areas of Circulation, Traffic, and Transportation, Agricultural and Soil Resources, Air Quality and Climate Change, and Noise. It also concludes that build out of the 2030 General Plan would have less than significant impacts after mitigation for Land Use (airport compatibility) and Cultural Resources (archaeological, paleontological, and human remains), and a less than significant impact for the remaining resources.

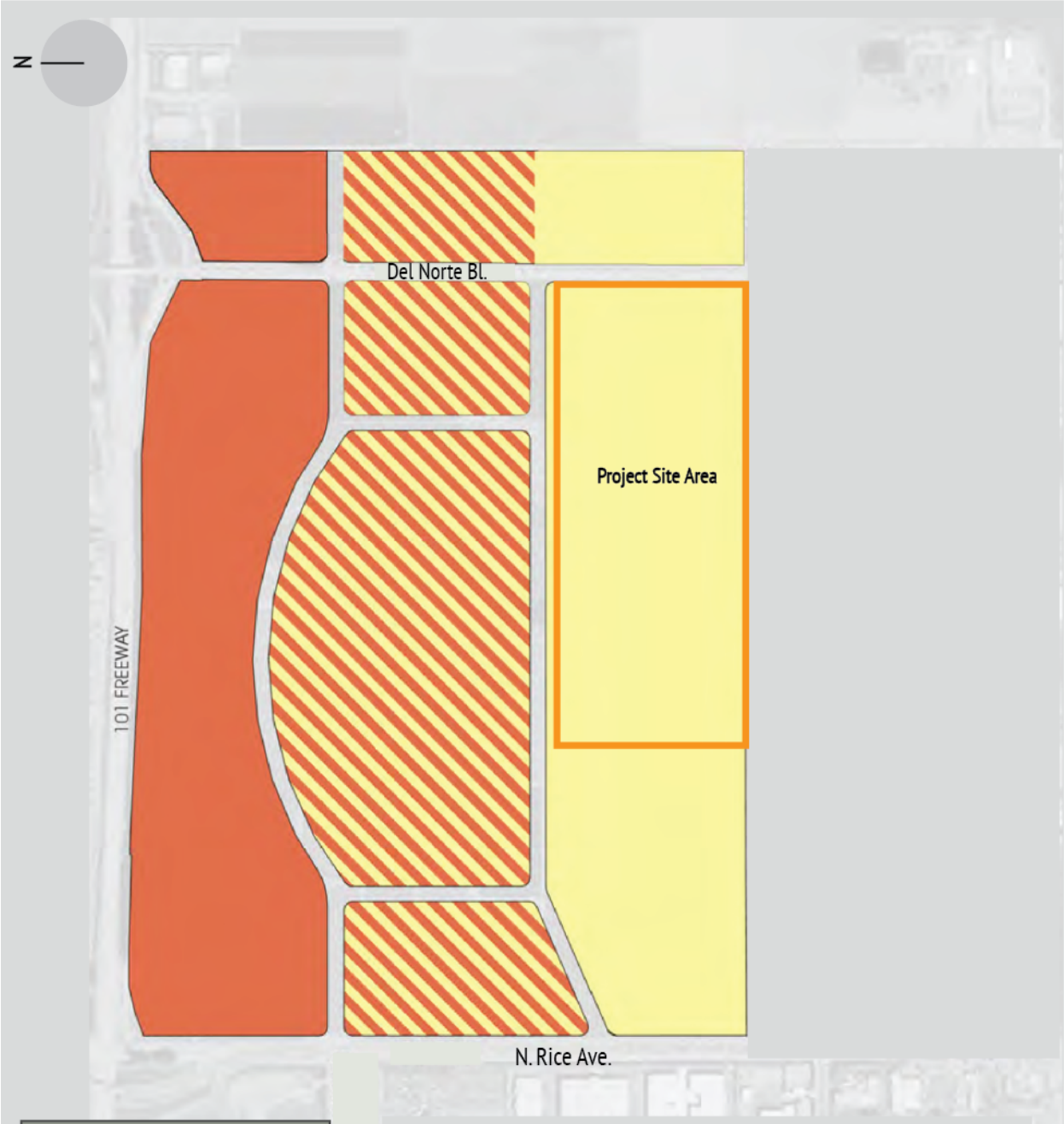
Sakioka Farms Business Park Specific Plan

The City certified an EIR, Adaptive Management Mitigation Monitoring and Reporting Program, and Statement of Overriding Considerations for the Sakioka Farms Specific Plan, and subsequently adopted the Specific Plan on July 12, 2012 (Resolution No. 14,253) (City of Oxnard 2012), after adopting the 2030 General Plan. The Specific Plan identifies the extent and intensity of all anticipated development activity for the Specific Plan area, and the EIR analyzes their impacts. A Notice of Determination was filed at the State on June 18, 2012.

The Specific Plan EIR (State Clearinghouse No. 2002071070) concludes that the Specific Plan would have significant and unavoidable cumulative impacts related to Agricultural Resources, Greenhouse Gas (GHG) emissions, and roadway Noise (City of Oxnard 2011b). The EIR also concludes Specific Plan build out would have less than significant impacts after mitigation for Air Quality, Biological Resources, Hazards and Hazardous Materials, Population and Housing, Public Services, and Transportation, and less than significant impacts for the remaining resources. Since the Specific Plan would be developed in phases over decades, the Specific Plan EIR allows for adaptive mitigation measures, allowing the lead agency to modify mitigation measures as circumstances change during development. Adapted mitigation measures are to achieve either the same or better final levels of impact as determined in the Specific Plan EIR.

The Specific Plan envisions the phased development of an industrial business park complex, and presents a master plan for orderly development, including guidelines and regulations. It identifies the location, character, and intensities of planned development activities; it establishes the alignment and design of a circulation system and all public facilities and infrastructure necessary to implement the Specific Plan. It also allows for flexible design of subsequent individual projects as long as they are consistent with the overall Specific Plan. Figure 6 details the general Specific Plan area land uses.

Figure 6. Land Uses in the Specific Plan Area



Net Acres	FAR	Approx. Sq. Ft. (millions)		
		BRP	Lt. Ind.	Total
94	0.5	1.4	---	1.4
160	0.5	1.6	2.4	4.0
134	0.5	---	3.1	3.1
388		3.0	5.5	8.5

The Specific Plan divides the site into seven planning areas across approximately 430 acres (Figure 7). The purpose of dividing the project this way is to allow individual developments to occur in a manner consistent with the overall master plan. The concept recognizes the Specific Plan area would be developed in phases over an extended period and allows a variety of uses that can respond to changing market conditions.

- **Planning Area 1** is the highest profile area of the Specific Plan site since it is located adjacent to US 101. Defined by an extension of Gonzales Road, this area encompasses about 80 acres and is planned to accommodate high-profile office and commercial development. Planning Area 1 would establish the primary design image for the Specific Plan area.
- **Planning Area 2** fronts Rice Avenue and would provide opportunities for new office, optional residential, business research, and industrial uses. The area covers approximately 35 acres and would maintain the design theme established in Planning Area 1.
- **Planning Area 3** is the 77-acre central portion of the project site and is planned to accommodate a range of development options. One option includes a high-intensity core with larger office buildings, optional residential uses, integrated community facilities, and commercial uses. This area could also become a continuation of the industrial development to the south (Planning Area 5) or office and commercial uses in Planning Area 1.
- **Planning Area 4** is a 30-acre area located along Del Norte Boulevard. This area may develop in a pattern similar to Planning Area 2, with an emphasis on new office, optional residential, and business research uses, or in a manner similar to Planning Area 5 to the south that caters to smaller industrial projects.
- **Planning Area 5** is designated as the primary light industrial area of the Specific Plan area. It encompasses about 116 acres and is planned to accommodate major industrial tenants and/or agricultural processing uses. It is adjacent to existing agricultural and light industrial uses and the Proctor and Gamble facility at the western end.
- **Planning Area 6** is a 36-acre area located east of Del Norte Boulevard. This area may be developed in several different ways depending on market conditions and may include a combination of light industrial and research development uses.
- **Planning Area 7** is a 14-acre area located in the northeast corner of the Specific Plan area. Although the smallest of the planning areas, it may become one of the more profile areas since it is close to the highway; it is situated for office and convenience commercial uses. A portion of this area is likely to be used for the planned reconstruction of the Del Norte Boulevard/US 101 interchange.

Figure 7. Specific Plan Planning Areas

Land Use Plan

A representative Land Use Plan is detailed in Section 4.3 of the Specific Plan. It identifies five primary land uses: business research, office, industrial, commercial, and optional residential. In all, the Specific Plan can accommodate a total development of up to 8,500,000 sf of building space. The Specific Plan includes a representative land use development scenario which reflects a potential build-out scenario to facilitate analysis (Specific Plan Exhibit 4.8); however, development intensity is not established for any individual Planning Area. The Specific Plan anticipates the potential for the intensity of development to shift from one Planning Area to another, but the overall Specific Plan development would be regulated by the Circulation Plan (see below) and the associated "Trip Generation Budget". The ultimate development of the Specific Plan area must remain consistent with the City of Oxnard 2030 General Plan, which anticipates a total of up to 8,500,000 sf of light industrial and business research park uses.

The Specific Plan allows for 5,500,000 sf of light industrial development. Planning Area 5, shown in Figure 7, consists of 116 acres on the southern boundary of the Specific Plan area and is designated as the primary light industrial area and anticipates 2,500,000 sf of light industrial development. Permitted uses in Planning Area 5 include manufacturing, fabrication, assembly, processing materials, agricultural processing, maintenance and repair, warehouse and storage, packaging, and offices (not to exceed 20 percent of the primary use). The proposed project would be located on a 64.65-acre portion of Planning Area 5, the rough outline of which is indicated in yellow on Figure 7.

Circulation Plan

The Specific Plan Circulation Plan (Specific Plan Section 4.4), shown in Figure 8, illustrates the general alignments, classifications, and location of arterials and major public streets in the Specific Plan area. The Circulation Plan is designed to accommodate several different development scenarios. The overall circulation concept relies on a hierarchy of features ranging from arterial roads to local streets. The system is designed to accommodate traffic to and within the Specific Plan area while discouraging through traffic from traversing the individual Planning Areas. The Circulation Plan is consistent with the Circulation Element of the City of Oxnard 2030 General Plan and provides for a phased implementation of roadway improvements to correspond to the phased development of each Planning Area.

As part of facility construction, off-site infrastructure would be installed as designed in the Final Map Phase I Off-site Improvement plans approved by the City as part of the review process (Tentative Tract Map PZ No. 20-300-01; Road Naming PZ No. 20-650-01; Development Agreement PZ No. 20-670-01). These components would ensure infrastructure necessary to facilitate the traffic generated by the project and future Phase I facilities in the Specific Plan can function properly.

Due to the variety of land use options and types of potential development activity, overall development intensity is regulated by the Specific Plan "Trip Generation Budget" (Specific Plan Exhibit 4.10), with each land use assigned a trip generation factor. In turn, phased development is limited to the parameters analyzed by the EIR.

Figure 8. Specific Plan Circulation Plan

Landscape Concept Plan

The Specific Plan includes a Landscape Concept Plan (Specific Plan Section 4.5) and Landscape Guidelines (Specific Plan Section 5.3). The Landscape Concept Plan establishes a "California" theme with an eclectic mix of indigenous plants and local materials that reflect the historical and cultural background of the area. These include perimeter landscaping, large landscape setbacks along interior and perimeter streets, pedestrian walkways to unify the site, and intersection treatments that create a "park-like" atmosphere and assist in visitor way-finding. All landscape and irrigation plans will be developed in accordance with the applicable standards set forth by the City.

Public Facilities Plan

The Specific Plan includes a Public Facilities Plan for water, wastewater, storm drain, and facility improvements to serve development in the Specific Plan area (Specific Plan Section 4.6). Specific analysis of infrastructure requirements and detailed design, construction, and phasing plans are identified in the Infrastructure Master Plan Technical Appendix of the Specific Plan EIR. The Water System Plan for the site includes a system of water mains to be constructed in conjunction with the phased Specific Plan build-out. The Wastewater Plan for the site includes a system of gravity mains to be constructed in conjunction with the phased build-out and will connect to existing facilities in Del Norte Boulevard and Rice Avenue. The Storm Drain Plan proposes a system of storm drain lines to be constructed in the streets and easements in accordance with the anticipated drainage patterns of the site as it is developed.

Phasing Plan

The Specific Plan is intended to be developed in various phases over several decades. To accommodate the anticipated intermittent development patterns, all required circulation, infrastructure, and community improvements that accommodate each new development of the Specific Plan shall be completed prior to, or concurrently with, individual projects. The first phase of the infrastructure improvements extends, installs, and upgrades the utilities necessary for new projects to be developed in the affected Planning Areas. Planning Area 5 includes 45.5 percent buildout of the entire Specific Plan, where the proposed project would be located.

1.4 Project Description

The proposed project would be a new, approximately 2,315,005 gross sf e-commerce fulfillment center for consumer products, of which the entitlement and building code square footage includes the calculation for the first and second floors, +/- 1,527,505, additionally, the project will include two storage mezzanines. The facility would be occupied and operated by a single tenant and would be used to fulfill internet retail purchases. The facility would be dedicated primarily to the storage and distribution of Class I-IV and Group A plastic commodities and would be considered a Group S-1 occupancy, a Special Industrial occupancy, or a mix of the two.

The proposed facility would be a two-story structure housing a complex proprietary inventory management system that would store products on a portion of the ground floor, the ground floor mezzanine, and on part of the second floor and second floor mezzanine. Table 1 details the development summary.

Table 1. Development Summary

Category	Quantity
Ground-level footprint	857,173 sf, single tenant proposed
Ground floor mezzanine, RSP Level 2	+/- 382,256 gross sf
Second floor, RSP Level 3	+/- 405,182 gross sf
Second floor, Process Level	+/- 264,903 gross sf
Second floor mezzanine, RSP Level 4	+/- 405,491 gross sf
Total Building Area	**2,315,005 gross sf**
Total Site Area	**2,816,130 gross sf***
Site access guard house	278 sf
Pump house	404 square feet
Fire water storage tank	930 square feet
Building height	57 feet
Automobile parking spaces	1,814 spaces (including 38 required ADA accessible spaces)
Motorcycle parking spaces	36 spaces
Truck trailer parking spaces	230 spaces (located away from the dock)
Short-term bicycle parking	10 spaces
Long-term bicycle parking	92 spaces
Dock doors	+/- 62

ADA = Americans with Disabilities Act
RSP = Robotic Storage Platform
sf = square feet
* Technical studies analyzed as part of this project were based on the total site area of 2,816,130 gross sf.

A proprietary material handling system installed in the process areas on the ground floor and second floor would allow employees to organize, package, and ship customer orders quickly and efficiently. The facility would have a ground floor footprint of approximately 857,173 sf, which would primarily accommodate the material handling equipment. The ground floor mezzanine, second floor (Robotic Storage Platform [RSP] portion), and second floor mezzanine would house a large, automated storage

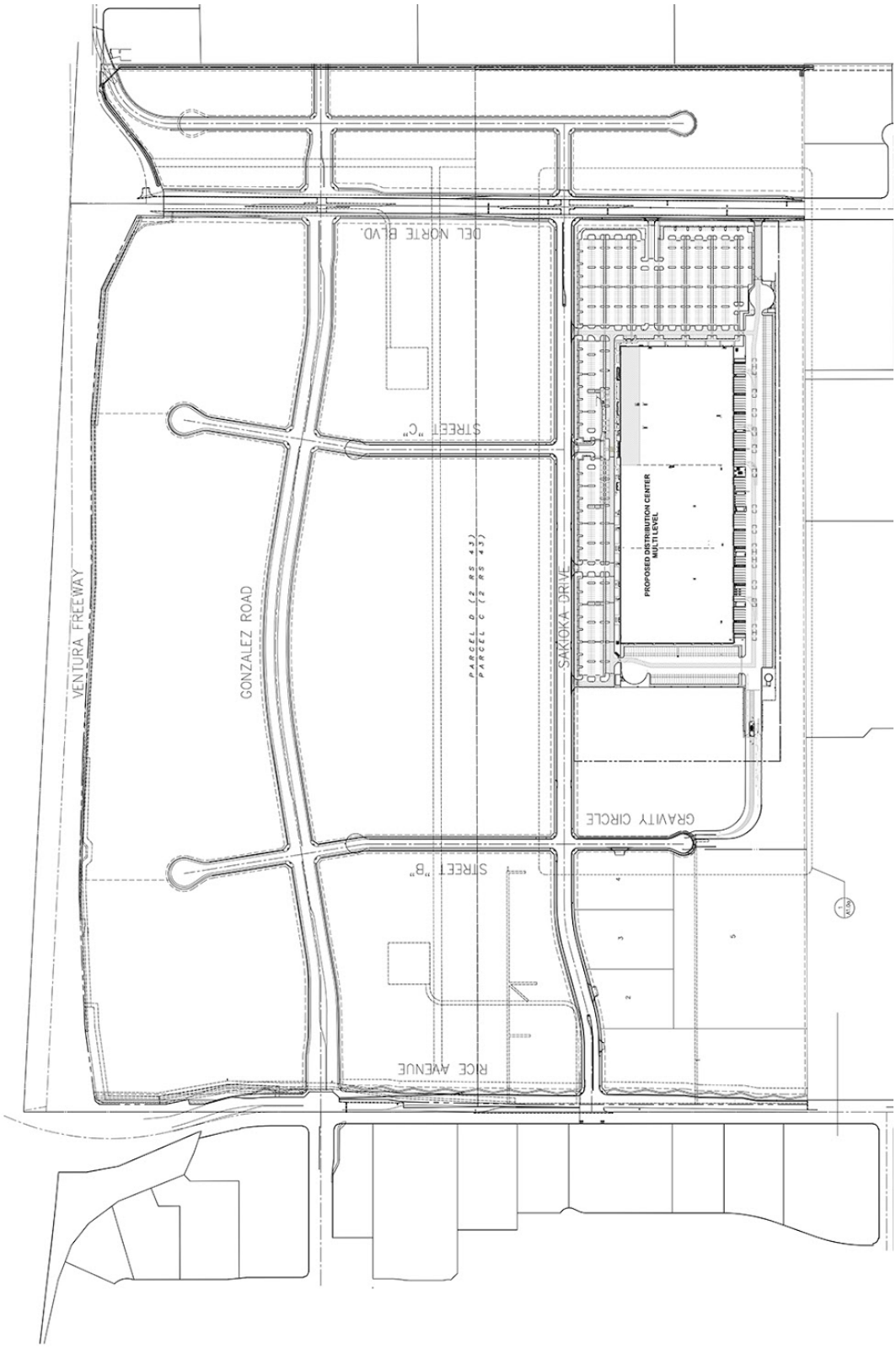
and retrieval system with shelf-like storage units (pods) that would be moved by low-profile robots. The remaining portion of the second floor would be used for material handling equipment (process level). The RSP floors would consist of fenced areas for the robotic storage and retrieval system, with the remaining space around the perimeter featuring employee workstations.

The facility would be constructed of tilt-up concrete panels and steel columns to support steel joist girders and bar joists. The footprint of the facility would be generally rectangular, measuring approximately 570 feet deep by 1,500 feet long. The warehouse portion of the facility would have a pitched roof with varied heights above the finish floor from 48 feet to approximately 44.5 feet for an average roof deck height of 46 feet and 2.5 inches. The maximum building height, with parapet walls, would be approximately 57 feet. Figure 9 provides the overall Project site plan. Detailed architectural and civil engineering plan sets are available in electronic form as requested by emailing the City Planning Department planning@oxnard.org, or viewed in person by visiting the City Planning Department offices at 214 C Street.

Facility Construction

Construction activities would consist of mass grading, building construction, asphalt paving of parking areas and roadways, and architectural coating of the inside and outside of the building. Project construction is anticipated to begin in Fall 2020 and continue for approximately one year. Cut and fill site grading would be balanced on site, and no soil import or export would be required. During construction, the project would be required to comply with applicable rules and regulations adopted by the Ventura County Air Pollution Control District (VCAPCD). Before a construction permit is issued for the proposed project, the project proponent would submit construction emissions minimization plans to the City for review and approval.

Figure 9. Conceptual Project Site Plan View



The construction emissions minimization plans would detail compliance with the following GHG emission-reducing measures and methods:

1) Where portable diesel engines are required, all off-road equipment would have engines that meet either the United States Department of Environmental Protection (USEPA) or California Air Resources Board (CARB) Tier IV Final off-road emission standards. If engines that comply with Tier IV Final off-road emission standards are not commercially available, then the next cleanest piece of off-road equipment available (e.g., Tier IV Interim) would be used.

2) During construction, idling time for off-road and on-road equipment would be limited to no more than two minutes, except as provided in exceptions to the applicable State regulations regarding idling for off-road and on-road equipment. Legible and visible signs would be posted in multiple languages in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.

3) The proposed project would use super-compliant architectural coatings from a manufacturer listed by the South Coast Air Quality Management District (SCAQMD). These coatings are defined as those with reactive organic compounds (ROC) less than 10 grams per liter.

The proposed project would also implement all methods and practices outlined in the Geotechnical Engineering Report related to earthwork, site preparation, excavation, subgrade preparation, fill placement and settlement monitoring, fill materials, compaction requirements, grading and drainage, exterior slab design and construction, utility trenches, construction, foundations, rammed aggregate pier (RAP), shallow foundations with RAP, floor slab, lateral earth pressures, and pavements prior to obtaining a grading permit.

Facility Operation

The facility would typically be occupied 24 hours a day and operate seven days a week, 365 days a year. The facility is expected to operate with two 8- to-10-hour shifts (as permitted by California law), consistent with typical operations for this type of use. This facility would employ around 2,172 employees per shift in peak season (November and December) and about 1,000 employees per shift in non-peak season (January through October), with most employees working on the ground floor where they would process packages and fulfill orders.

Operations at the facility would fulfill orders for smaller consumer products that fit into 16-inch by 18-inch bins. Once a product is packaged, it would be placed in a third-party delivery service trailer (53-foot) to be taken to an off-site sorting location, where it would then be placed on smaller trucks for delivery to customers.

Low-profile robots would move through the product storage area and carry pods with consumer products to workstations where employees would pick items to fulfill customer orders and stow more products for future orders. Once items were retrieved or stowed, the robot would return the pod to a storage location in the field, and the employee would place the ordered item(s) in a tote that would be conveyed to the processing areas. Here another group of employees would sort, combine, package, and

ship the products. Inventory replenishment (i.e., stowing) follows a similar process, with consumer products delivered to the facility via tractor trailers, transferred to the RSPs, and placed in the pods until an order is placed for them.

Vehicular Access and Circulation

The Specific Plan area is in north Oxnard, off Del Norte Boulevard, south of US 101 and east of Rice Avenue; it is served by a circulation system that includes the freeway, arterial, and collector streets. Direct access to the project site will be provided via a new internal roadway circulation system planned as part of the Specific Plan, primarily via Sakioka Drive and Gravity Circle.

The Sakioka Farms Business Park Specific Plan assumed Area 5 to have up to 16,250 total peak daily vehicular trips. Project Bruin would result in 10,321 total peak daily trips. Therefore, Area 5 would have up to 5,929 peak daily trips available to allocate to future development projects. Table 2 details the Project trip allocation as it relates to the total Sakioka Farms Business Park trip allocation assumptions.

Table 2. Area 5 Trip Allocation

	AM Peak Hour Trips	PM Peak Hour Trips	Daily Trips
Assumed Total Area 5 Trips	1,900	2,150	16,250
Project Bruin	1,207	1,366	10,321
Remaining Area 5 Trips	**693**	**784**	**5,929**

Parking

The City of Oxnard Zoning Ordinance requires 827 on-site parking spaces for the project. The proposed project would provide 1,814 on-site parking spaces, including 38 ADA-accessible spaces, and 230 truck trailer spaces. The project would also include short-term and long-term bicycle parking and infrastructure for charging electric vehicles, including freight trucks. The 1,814 on-site parking spaces would exceed the City's parking requirement for the total building space occupied by a distribution facility. Truck and car circulation would be completely separated to reduce potential conflicts.

Architectural Guidelines

The facility would follow the Specific Plan Design Guidelines, including those for architectural style, entries, and surface finishes. The palette would consist of neutral colors, with exterior finishes in subtle tones of beige, white, gray, and Hale Village (a deep brownish-beige Sherwin Williams paint color), with vision glass (1-inch insulated glazing with "low E") and spandrel glass. Figure 10 shows the conceptual building elevation of the northeast corner from the Del Norte and Street A (Sakioka Drive) Intersection.

Figure 10. Conceptual Northeast Elevation View

The exterior walls of the facility would feature surface texture, some variation in roof line, difference of depth in vertical and horizontal elevations, pedestrian-level colonnades and awnings, and wainscoting and landscaping at the base of the building. The main entry of the facility would include an aluminum canopy/awning feature with hanger rods above the windows at the office entry that would extend towards the employee parking lot to provide a focal point for the building. The corners of the building would feature a design of metal panels and a rectangle pattern embedded in the surface of the walls to provide external articulation. The color scheme at the corners would vary slightly from that of the rest of the walls.

In accordance with Section 5.2.10 of the Specific Plan, the applicant would work collaboratively with the City of Oxnard Arts and Culture Commission to incorporate on-site public art features. The applicant would identify the proper location for the public art on the site to ensure it has prominence but does not affect operations, site lines, and the overall function of the facility.

Green Building Design

In addition to adhering to the requirements of California Green Building Standards Code, Title 23 (CALGreen), this facility would be designed with several sustainable green technology considerations including, but not limited to, the following:

- The roof and electrical system would be designed for solar panel installation, which would be installed within the first two years of operation.
- The roofing material would include products that facilitate solar reflectance and thermal emittance.

- The facility would be designed to provide infrastructure to support the use of electric-powered forklifts, exterior yard trucks, and/or other on-site vehicles.
- The facility would be constructed with the appropriate infrastructure (e.g., electrical conduits) that could accommodate electric charging stations for trucks, in anticipation of future technology that allows trucks to operate partially on electricity.
- Electric vehicle charging stations would be provided.
- Parking would be designed with landscape islands and trees to reduce heat island effect.
- The facility would be insulated throughout.
- Lighting would be light-emitting diodes inside and outside of the facility, throughout the project site.
- Bicycle storage and changing rooms would be provided.
- Stormwater design quantity and quality control measures would be provided, including a detention basin at the southeastern portion of the site.
- Project lighting would be designed to reduce potential light pollution spilling onto adjacent parcels and roadways.
- Recycled water would be used and drought tolerant landscaping would be included throughout the project site.
- Fundamental refrigerant management would be provided, which would consist of zero use of chlorofluorocarbon-based refrigerants in new base building heating, ventilation, and air conditioning and refrigeration systems.
- Indoor Environmental Quality options would be considered, including low-emitting materials for adhesives, paints, and carpet.
- All lighting, heating, and cooling systems would be controlled, to maintain comfort and reduce energy use.

Energy

The proposed project would feature a complete photovoltaic solar system on the roof to offset 80 percent of the building's electrical energy usage, installed within the first two years of operation. The roof would also feature a single-ply, Energy Star-rated, white roofing system and high-efficiency heating, ventilation, and air conditioning systems with carbon dioxide sensors for maximum fresh air with minimum energy use. The proposed project would employ a fully-automated Energy Management System to monitor and control all mechanical and lighting systems.

Water

The proposed project would feature water-wise, low-flow plumbing fixtures.

Landscaping

A 30-foot landscaped buffer along Del Norte Boulevard (General Plan Policy 9.4) and street treatments (Specific Plan, Section 4.5) are required in the Specific Plan area. The project site would include a minimum of 10 percent landscaping (Specific Plan, Section 6.3.8). The proposed parking area would be planted with one tree for every six parking stalls, and the parking lot would be screened from the adjacent roadway with a 36-inch hedge. All landscaping and irrigation would comply with City of Oxnard Ordinance No. 2822, Landscape Water Conservation Standards, and applicable water conservation requirements of the State of California. The setback from Del Norte Boulevard would include informal tree planting using species identified by the City of Oxnard. The proposed project would also feature water-wise, drought-tolerant landscape on drip irrigation with species per the City's specifications. Figure 11 details the proposed Plant Materials list.

Lighting

Exterior lighting of the facility would meet code requirements and other City of Oxnard standards. Given that the facility will operate round the clock and process and store goods of potentially high-dollar value, the facility would be lit well enough for safety and security purposes, while reducing light spillage onto adjacent areas, as appropriate and feasible.

Site Security

The facility site would have 24/7 security, commensurate with the non-stop operations and the high dollar value of goods stored. Employees and visitors would enter through the main entrance lobby on Sakioka Drive only and would not be permitted into the facility without an access card. Trucks would enter the truck court through a staging area off Sakioka Drive, and drivers would be required to register with the Guard Station at the southwest corner of the site.

Figure 11. Plant Materials List

PLANT MATERIALS LIST

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE WUCOLS	LOCATION/NOTES
TREES:						
	TIPUANA TIPU	TIPU TREE	36" BOX	40' O.C. AS SHOWN	MED	STREET TREE 'A' STREET
	FRAXINUS 'RAYWOODII'	RAYWOOD ASH	24" BOX	SEE PLAN	MED	EXTERIOR EDGES OF PARKING LOT
	MAGNOLIA GRANDIFLORA	MAGNOLIA	24" BOX	40' O.C. AS SHOWN	MED	STREET TREE DEL NORTE
	WASHINGTONIA ROBUSTA	MEXICAN FAN PALM		8' TRUNK SEE PLAN	LOW	STREETSCAPE ACCENT 'A' STREET
	WASHINGTONIA HYBRID	HYBRID FAN PALM		8' TRUNK SEE PLAN	LOW	STREETSCAPE ACCENT DEL NORTE
	SYGRUS ROMANZOFFIANA	QUEEN PALM		8' TRUNK SEE PLAN	MED	STREETSCAPE ACCENT 'A' STREET AND DEL NORTE
	LOPHOSTEMON CONFERTA	BRISBANE BOX	24" BOX	SEE PLAN	LOW	SCREEN TREE/STREETSCAPE TREE BOTH STREETS
	CERATONIA SILIQUA	CAROB TREE	24" BOX	SEE PLAN	LOW	PERIMETER SCREEN TREE ONLY
	ARBUTUS MARINA	STRAWBERRY TREE	24" BOX	SEE PLAN	LOW	PARKING LOT TREE
	METROSIDEROS EXCELSUS	NEW ZEALAND CHRISTMAS TREE	24" BOX	SEE PLAN	LOW	PERIMETER PLANTER TREE
	OLEA EUROPA 'SWAN HILL'	FRUITLESS OLIVE	24" BOX 36" BOX AT PROJECT ENTRIES	SEE PLAN	LOW	LARGE EVERGREEN TREE AND ENTRY ACCENT
	EUCALYPTUS FICIFOLIA	RED FLOWERING GUM	24" BOX	SEE PLAN	LOW	ACCENT TREE ON SITE
	PITTOSPORUM UNDULATUM	VICTORIAN BOX	24" BOX	SEE PLAN	MEDIUM	ACCENT TREE DEL NORTE AND ON SITE
	CHORISIA SPECIOSA (THORNLESS)	BOTTLE TREE	24" BOX	SEE PLAN	MEDIUM	ACCENT TREE 'A' STREET AND ON SITE
	LEPTOSPERMUM LAEVIGATUM	AUSTRALIAN TEA TREE	24" BOX	SEE PLAN	LOW	ON-SITE ACCENT TREE
	SHRUBS					
	LARGE SHRUBS:					
	GARRAYA ELLIPTICA	SILK TASSEL TREE	5 GA	6' O.C.	LOW	PERIMETER HEDGE- REAR OF PROPERTY
	HETEROMELES ARBUTIFOLIA	TOYON	5 GA	6' O.C.	LOW	PERIMETER HEDGE- INFORMAL GROUPINGS
	PRUNUS LAURACERASUS	ENGLISH LAUREL	5 GA	6' O.C.	MED	PERIMETER HEDGE-INFORMAL GROUPINGS
	FEIJOA SELLOWIANA	PINEAPPLE GUAVA	5 GA	5' O.C.	LOW	GROUPINGS IN OPEN AREAS
	ROSEMARINUS 'TUSCAN BLUE'	TUSCAN ROSEMARY	5 GA	5' O.C.	LOW	GROUPINGS IN OPEN AREAS
	ECHIUM CANDICANS	PRIDE OF MADIERA	5 GA	5' O.C.	LOW	LARGE GROUPINGS/STREETSCAPE
	ELEAEGNUS 'GILT EDGE'	SILVERBERRY	5 GA	5' O.C.	LOW	LARGE GROUPINGS
	MELALEUCA DECUSSATA	LILAC MELALEUCA	5 GA	5' O.C.	LOW	LARGE GROUPINGS
	THEVETIA PERUVIANA	YELLOW OLEANDER	5 GA	5' O.C.	LOW	LARGE GROUPINGS/STREETSCAPE
	MEDIUM SHRUBS:					
	CISTUS PURPUREUS	ROCKROSE	5 GA	4' O.C.	LOW	STREETSCAPES AND PARKING LOT ISLANDS
	SALVIA CLEVELANDII 'ALLEN CHICKERING'	CALIF. BLUE SAGE	5 GA	4' O.C.	LOW	STREETSCAPES AND PARKING LOT ISLANDS.
	LIGUSTRUM TEXANUM	PRIVET	5 GA	4' O.C.	MED	PARKING LOT SCREENING FRONTING ON STREETS TO BE 36" HIGH AT PLANTING
	PHORMIUM 'BRONZE BABY'	DWARF FLAX	5 GA	4' O.C.	LOW	STREESCAPES AND PARKING LOT ISLANDS
	RHAPHIOLEPIS 'JACK EVANS'	PINK INDIA HAWTHORN	5 GA	4' O.C.	LOW	PARKING LOT ISLANDS AND STREETSCAPES
	WESTRINGIA R. 'MORNING LIGHT'	FALSE ROSEMARY	5 GA	4'O.C.	LOW	PARKING LOT PLANTING
	SPRAWLING SHRUBS:					
	BOUGANVILLEA 'SAN DIEGO RED'	BOUGANVILLEA	5 GA	5'O.C.	MED	STREETSCAPES
	CARISSA 'TUTTLE'	NATAL PLUM	5 GA	4' O.C.	LOW	PARKING LOT ISLANDS
	CISTUS SALVIFOLIUS	SAGELEAF ROCKROSE	5 GA	4' O.C.	LOW	PARKING LOT ISLANDS/PLANTERS, STREETSCAPES
	CEANOTHUS 'HORIZONTALIS'	CARMEL CREEPER	5 GA	4' O.C.	LOW	PARKING LOT ISLANDS
	GREVILLEA 'BOONGAIA SPINEBILL'	GREVILLEA	5 GA	4' O.C.	LOW	PARKING LOT ISLANDS
	LEPTOSPEMUM 'PINK CASCADE'	TEA TREE	5 GA	4' O.C.	LOW	PARKING LOT ISLANDS
	PLUMBAGO AURICULATA	CAPE PLUMBAGO	5 GA	5' O.C.	LOW	LARGER PLANTERS
	ACCENT SHRUBS					
	COLEONEMA 'SUNSET GOLD'	DWARF BREATH OF HEAVEN	5 GA	3' O.C.	LOW	BUILDING ENTRIES AND PARKING LOT
	DASILYRION WHEELERI	DESERT SPOON	5 GA	3' O.C.	LOW	STREETSCAPE AND BUILDING ENTRIES
	DIETES BICOLOR	FORTNIGHT LILY	5 GA	3' O.C.	LOW	STREETSCAPE AND BUILDING ENTRIES
	KNIPHOFIA UVARIA 'ALCAZAR'	TORCH LILY	5 GA	3' O.C.	MED	STREETSCAPE AND BUILDING ENTRIES
	STRELITIZA REGINA	BIRD OF PARADISE	5 GA	3' O.C.	MED	STREETSCAPE AND BUILDING ENTRIES
	VINES:					
	PASSIFLORA VITIFOLIA	RED PASSION FLOWER	5 GA	15' O.C.	MED	PERIMETER CHAIN LINK FENCE
	BIGNONIA CAPREOLA 'TANGERINE BEAUTY'	CROSSVINE	5 GA	15' O.C.	MED	PERIMETER CHAIN LINK FENCE
	FICUS PUMILA	CREEPING EVERGREEN FIG	5 GA	12' O.C.	MED	REAR SCREEN WALL AT TRUCK AREA
	GROUND COVERS:					
	LARGE SCALE GROUND COVERS					
	ROSEMARINUS 'PROSTRATA'	PROSTRATE ROSEMARY	1 GA	36" O.C.	LOW	STREETSCAPE AND PARKING ISLANDS
	LANTANA MONTEVIDENSIS	LANTANA	1 GA	36" O.C.	LOW	PLANTER AREAS/PARKING ISLANDS
	MYOPORUM PARVIFOLIUM	MYOPORUM	1 GA	48" O.C.	LOW	LARGE SCALE GROUND COVER
	GRASSES:					
	CAREX DIVULSA	BERKELEY SEDGE	1 GA	36" OC.	MED	STREETSCAPE GROUNDCOVER
	MUHLENBERGIA CAPILLARIS	PINK MUHLEY	1 GA	36" O.C.	LOW	STREETSCAPE GROUNDCOVER
	ACCENT GROUND COVER					
	ACHILLEA MILLIFOLIA 'MOONSHINE'	YARROW	1 GA	36" O.C.	LOW	STREETSCAPE GROUNDCOVER
	ALOE STRIATA	ALOE	1 GA	36" O.C.	LOW	STREETSCAPE GROUNDCOVER
	FESTUCA MAIERI	ATLAS FESCUE	1 GA	36" O.C.	LOW	STREETSCAPE GROUNDCOVER
	NON-IRRIGATED HYDROSEED IN BASIN					

Pedestrian Amenities

The proposed project would provide a minimum 10-foot-wide, vegetated walkway adjacent to the building between the parking area and the front entrance to facilitate anticipated worker/pedestrian volume. Landscaping would separate truck and car circulation from pedestrian movement areas. Elements that help the architecture to have a human-scale appearance at the pedestrian level include entry canopies and colonnades and awnings in various locations around the building.

Given the large employee count of the facility, signage and pedestrian pathways would be incorporated throughout the site parking areas and around the facility to lead employees and visitors safely to the front entry. Amenities would include dedicated wayfinding on pedestrian paths throughout the parking areas to further separate pedestrians from auto circulation. Employee parking areas would be lit at night. Pedestrian-level lighting would be installed along the entrance façade and walkways.

There would be designated employee drop off and pick up areas with weather shelters, as well as identified bike parking, smoker lounges, and ample interior building break room areas. The facility would incorporate an entryway consisting of optical turnstiles with clear swinging panels for employee entry to the facility.

On-Site Infrastructure

The project would adhere to the planned improvements and upgrades outlined in the Final Map off-site improvement plans to service the facility. The water, sewer, power, and gas needs for this facility would be in line with those anticipated for the Specific Plan, and typical of warehouse/distribution centers.

A storm drain system of pipes/box culverts and channels would be installed on the site. The proposed improvements would include a series of drainage facilities (inlets and laterals) for the primary, secondary, and local street sections that would connect to the storm drain system. The channels on the project site would need to be resized and reconstructed based on the proposed drainage conditions. These improvements would mitigate the proposed drainage conditions with the use of detention facilities as parcels get developed. The on-site storm drainage system would comply with local and state building codes and ensure that stormwater leaving the site would be properly treated to minimize stream and ocean pollution. These improvements would occur in accordance with the Specific Plan.

Discretionary Approvals

The following discretionary approvals are necessary from the City of Oxnard:

- Development Design Review Permit (PZ 20-200-04)
- Minor Modification to transfer trips within Area 5 per the Specific Plan Circulation Masterplan and Trip Budget (PZ 20-140-15)
- Lot Line Adjustment to merge 5 lots into one 64.643-acre lot (PZ 20-310-04)

Section 2: Consistency Review Overview

The extent and intensity of anticipated development activity for the Sakioka Farms Business Park Specific Plan area are identified in the Specific Plan and analyzed in the 2012 Specific Plan EIR. Development project requests consistent with the Specific Plan are not subject to additional environmental review unless otherwise required by CEQA. It is the responsibility of the City Development Services Director or designee to determine the need for additional environmental assessment for unique or unusual circumstances not previously addressed in the EIR. The purpose of this Consistency Evaluation is to assist the Developmental Services Director or designee in evaluating whether circumstances or project changes have occurred, or new information of substantial importance may result in a new significant impact or substantial increase in the severity of a previously identified significant effect.

CEQA Guidelines section 15168(c) states that subsequent activities under a program EIR, such as the Specific Plan EIR, must be examined in light of the program EIR to determine whether an additional environmental document must be prepared. If the subsequent activity would have effects not examined in the program EIR, an initial study leading to further environmental review may be required, but not where an analysis pursuant to Section 15162 demonstrates the project would not cause new or substantially more severe significant impacts, or require new mitigation measures not adopted by the project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified. (CEQA Guidelines sections 15168(c)(1) & (2) and 15162.)

Section 15162 of the CEQA Guidelines requires a subsequent EIR after an EIR has been certified for a project if, based on substantial evidence in light of the whole record, one or more of the following conditions exist:

1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects;
2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
    a) The project will have one or more significant effects not discussed in the previous EIR.
    b) Significant effects previously examined will be substantially more severe than shown in the previous EIR.
    c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.

d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The analysis pursuant to Section 15162 demonstrates whether the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document, such as an EIR or Subsequent EIR, would be required. (CEQA Guidelines sections 15168(c)(2) and 15162.)

2.1 Project-Specific Environmental Analysis

The CEQA Guidelines state that "where the subsequent activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered by the program EIR" (CEQA Guidelines, Section 15168(c)(4)). The City has prepared this Checklist for Consistency Evaluation pursuant to CEQA Guidelines sections 15168(c) and 15162 for Later Activities Following Certification of Specific Plan Final EIR (FEIR) (Consistency Evaluation) to evaluate whether the Project Bruin environmental impacts are covered by and within the scope of the 2012 Specific Plan FEIR. The following Consistency Evaluation substantiates and supports the City's determination that the Project Bruin environmental impacts are within the scope of the 2012 FEIR, do not require a subsequent EIR or negative declaration under CEQA Guidelines Section 15162 and, in conjunction with the 2012 FEIR, adequately analyze the project's environmental impacts. The Adaptive Management Mitigation Monitoring and Reporting Program dated May 2020 includes all of the 2012 FEIR mitigation measures and the adaptive replacement mitigation measures as adopted by the City Council's approval of Development Agreement (Ordinance No. 2983; PZ 20-670-01) on June 30, 2020. This Consistency Evaluation determines which of the 2012 FEIR mitigation measures and 2020 adaptive replacement mitigation measures are applicable and would be implemented by Project Bruin. For transparency, this Consistency Evaluation also lists the remaining 2012 FEIR mitigation measures and 2020 adaptive replacement mitigation measures that are not applicable to Project Bruin, but may be applicable to future Specific Plan phases and/or development projects.

Technical Reports Referenced in Analysis

Technical reports were prepared for the project and used to substantiate project-specific environmental analysis in the Consistency Evaluation. These reports are listed with the author and in-text citation used throughout the report.

- Air Quality and GHG Analysis Report (FirstCarbon Solutions [FirstCarbon] 2020a)
- Biological Resources Assessment (BRA) (FirstCarbon 2020b)
- Cultural Resources Assessment (FirstCarbon 2020c)
- Geotechnical Engineering Report (TerraCon Consultants, Inc. [TerraCon] 2020)
- Phase I Environmental Site Assessment (ESA) (GeoSyntec Consultants [GeoSyntec] 2020)

- Phase II ESA - this is compiled with and provided as part of the Phase I ESA
- Hydrologic and Hydraulic Drainage Report for Project Bruin (Kimley-Horn Associates [Kimley Horn] 2020a)
- Preliminary Engineering Water Study - compiled as part of the Hydrologic and Hydraulic Drainage report (Kimley Horn 2020a)
- Stormwater Quality Management Plan - compiled as part of the Hydrologic and Hydraulic Drainage report (Kimley Horn 2020a)
- Preliminary Engineering Sewer Study (Kimley Horn 2020b)
- Noise Impact Analysis (First Carbon 2020c)
- Traffic and Site Access Analysis (Associated Transportation Engineers [ATE] 2020)
- Focused Transportation Assessment (Linscott, Law & Greenspan [LLG] 2020)

These technical reports are incorporated by reference and available as electronic form at the City's website where environmental documents are archived: https://www.oxnard.org/city-department/community-development/planning/environmental-documents or can be requested by emailing the City Planning Department planning@oxnard.org, or reviewed in person by visiting the City Planning Department offices at 214 C Street.

2.2 Determination

In accordance with CEQA Guidelines sections 15168 and 15162, the potential impacts associated with the proposed development are within the scope of the FEIR prepared for the Specific Plan. That document addresses the potential environmental effects of future development in the Specific Plan area based upon build-out forecasts projected from the land use designations and other policies and regulations governing development intensity and density.

The 2012 FEIR concluded that the Specific Plan would have less than significant impacts after mitigation on Air Quality, Biological Resources, Hazards and Hazardous Materials, Population and Housing, Public Services andTransportation. The Specific Plan would have significant and unavoidable cumulative impacts related to Agricultural Resources, GHG emissions, and roadway Noise.

Overriding Considerations

In certifying the FEIR and approving the Specific Plan, the City Council balanced the benefits of the Specific Plan project against the unavoidable significant impacts identified above in determining whether to approve the project. The City determined that the benefits of the project outweighed the unavoidable Agricultural Resources, cumulative GHG emissions, and traffic-related Noise impacts of the project. The benefits set forth below constitute the overriding considerations that warranted approval of the project:

1) Specific Plan implementation will provide a total of up to 8,500,000 sf of new development; 3,000,000 sf of new business and research park uses, and 5,500,000 sf of light industrial uses, generating increased business and employment opportunities in Oxnard. Development of the site

with business and research park and light industrial uses has been envisioned since the City of Oxnard 2020 General Plan was prepared and approved in 1989.

2) The Specific Plan represents the continuation of a logical development pattern occurring in the surrounding area.

3) With the implementation of the 33 recommended mitigation measures the impacts of Specific Plan implementation on transportation and traffic would be reduced to a less than significant level. These mitigation measures require numerous transportation improvements to be developed in four phases in synchronization with Specific Plan development. The developer(s) would be required to either fully implement or pay a fair share contribution to the planned transportation improvements, to bring the improvements incrementally closer to completion.

4) With the implementation of the 13 recommended mitigation measures the impacts of the project on water supply would be reduced to a less than significant level. These mitigation measures provide for numerous improvements to be developed in synchronization with project development. The developer would be required to pay a fair share contribution to the planned water supply improvements (both recycled and potable), which brings the improvements one step closer to implementation.

2.3 Summary of Findings

In accordance with CEQA Guidelines sections 15168 and 15162 and as set forth in this Consistency Evaluation, the Project Bruin development would not have effects that were not examined in the Specific Plan FEIR because:

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken, that will require major revisions to the FEIR, due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no new information of substantial importance as that term is used in CEQA Guideline section 15162(a)(3).
- The project proponent does not refuse to implement any mitigation measures that were previously infeasible but are now feasible, or any other mitigation measures, including mitigation measures considerably different from those in the FEIR, that would be necessary to substantially reduce significant environmental impacts.
- The project proponent is required to comply with the applicable mitigation measures and regulatory programs identified in the FEIR and the Adaptive Management Mitigation Monitoring and Reporting Program dated May 2020.

Pursuant to CEQA Guidelines 15168(c)(4)-(5) and (e), and as demonstrated by the substantial evidence contained in the Consistency Evaluation and the associated administrative record, Project Bruin is an activity covered by and within the scope of the program approved by the FEIR; the FEIR adequately

describes the project for purposes of CEQA; and further environmental documentation is not required. Furthermore, Project Bruin would have no significant impacts to CEQA topics adopted by the City in 2017, and no new mitigation measures are required to address these topics.

Section 3: Checklist for Consistency Evaluation

3.1 Aesthetics & Urban Design

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Have a substantial adverse effect on a scenic vista such as an ocean or mountain view from an important view corridor or location as identified in the Oxnard 2030 General Plan or other City planning documents?	Less than significant	No	No
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway, or route identified as scenic by the County of Ventura or City of Oxnard?	Less than significant	No	No
3) Substantially degrade the existing visual character or quality of the site or its surroundings such as by creating new development or other physical changes that are visually incompatible with surrounding areas?	Less than significant	No	No
4) Add to or compound an existing negative visual character associated with the project site?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No
5) Create a source of substantial light or glare that would adversely affect day or nighttime views in	Less than significant	No	No

the area?			

The Specific Plan EIR determined that implementation of the Specific Plan project would not result in any significant direct or cumulative impacts related to Aesthetics and Urban Design, and no mitigation measures were required.

Setting

The visual setting of the Specific Plan area is characterized by both the nature of the agricultural open space to the east and northeast and the industrial uses to the south and west. The areas immediately east and northeast of the site are predominantly agricultural greenspaces within the Oxnard-Camarillo Greenbelt Agreement Area.

There is no official state designated scenic route or highway in the Specific Plan area. However, major transportation routes border the area, including US 101 to the north, Rice Avenue to the west, and Del Norte Boulevard bisecting the eastern portion of the project site. Rice Avenue is a view corridor characterized by a starkly contrasting visual environment. On the west side, development includes office, research, industrial, and other related uses in contemporary, low rise, business parks. Buildings incorporate a variety of architectural treatments to reduce massing and create a high visual quality development. Wide landscaped setbacks and buffers characterize many developments located on Rice Avenue south of Gonzales Road. Views of the east side of Rice Avenue are dominated by row crop production separated from the roadway by fencing. Overhead utility poles, cables, and wires provide the only vertical elements.

Landscape trees of various species and sizes occur throughout the vicinity. Landscaping in parking lots and along the perimeter of adjacent sites incorporate grass, ornamental shrubs, trees, and other plants in various stages of maturity. Palms are the predominant type of trees used along roadways, including in the medians. Stands of eucalyptus and windrows are often found growing along the perimeter of properties having been planted to provide protection for crops. These trees often comprise the “skyline” in predominantly agricultural areas.

The Specific Plan area encompasses approximately 430 acres of agriculture/open space historically planted with several types of row crops. Except for a few farming related structures (i.e., sheds) the site is undeveloped. While the site has only been used for agriculture and remains undeveloped, it was nevertheless altered when it was converted to agricultural uses from its natural setting.

The Specific Plan area is currently undeveloped, and development would introduce new sources of light and glare. However, existing uses in the vicinity of the Specific Plan area are manufacturing, industrial, light industrial, industrial related and visitor serving uses and are not sensitive receptors.

Impact Discussion

1) Would the project have a substantial adverse effect on a scenic vista such as an ocean or mountain view from an important view corridor or location as identified in the Oxnard 2030 General Plan or other City planning documents?

The Specific Plan area itself does not represent a scenic vista; therefore, implementation of the proposed development would not have a direct adverse effect in that respect. Views of the Santa Monica Mountains to the east, and Camarillo Hills, Los Padres Mountains, and Los Padres National Forest would remain from Rice Avenue to the west, Del Norte Boulevard to the east, and US 101 to the north. The development of the proposed Project would be compatible with existing city-wide land use patterns and compliant with development envisioned in the Sakioka Farms Specific Plan. The proposed development has the potential to introduce obstructions to low-angle views of the surrounding area, including views of the nearby greenbelt and the coastal mountain range. This impact to the existing visual character of the surrounding area and the City of Oxnard would be less than significant, which is consistent with the Specific Plan EIR's finding of less than significant. Development of the proposed e-commerce fulfillment center would not substantially obstruct surrounding views; therefore, the Project would not significantly adversely affect scenic vistas, consistent with the findings of the Specific Plan EIR.

2) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway, or route identified as scenic by the County of Ventura or City of Oxnard?

The Specific Plan area is not a scenic resource, nor do any scenic resources exist on the site. There are no significant natural features (such as rock outcroppings, bodies of water, substantial stands of native vegetation, etc.) or native California trees of aesthetic value (e.g., oak, sycamore, California black walnut or California bay trees) on or adjacent to the entire Specific Plan area, including the project site. There are no major open spaces, and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) or historic buildings on the site. Although US 101 is eligible for designation in Oxnard, the Specific Plan area is not located within or near a State-designated scenic highway (Caltrans 2017). The Oxnard 2030 General Plan Background Report states that the nearest officially designated scenic route to the City is SR-33 in Ventura, which is over 10 miles from the project site (Oxnard 2006a). Therefore, development of the proposed e-commerce fulfillment center would not significantly adversely affect scenic resources, consistent with the findings of the Specific Plan EIR.

3) Would the project substantially degrade the existing visual character or quality of the site or its surroundings such as by creating new development or other physical changes that are visually incompatible with surrounding areas or that conflict with visual resource policies contained in the Oxnard 2030 General Plan or other City planning documents?

The Specific Plan EIR found that future development would be compatible with surrounding uses, both functionally and visually. The Specific Plan design guidelines and development regulations establish the

character and style of the Specific Plan while accommodating individual development identities and promoting interrelationships between complementary land uses and community features. The design guidelines include guiding principles for site planning, architecture, landscaping, and signage; they include policies regarding site layout, building orientation, access (including handicap access), parking, lighting, transitional areas, utility areas, and security provisions.

The proposed project complies with the design guidelines, setbacks and development regulations of the Specific Plan and would be compatible with the visual character of the surrounding area. Impacts associated with the development of the proposed project within the Specific Plan area would be consistent with the analysis in the Specific Plan EIR, and therefore, development of the proposed e-commerce fulfillment center would not significantly adversely affect the visual character of the site or the surrounding area, consistent with the findings of the Specific Plan EIR.

5) Would the project create a source of substantial light or glare that would adversely affect day or nighttime views in the area?

The Specific Plan area is currently undeveloped, and development of the proposed e-commerce fulfillment center would introduce new sources of light and glare to the site. However, existing uses in the vicinity of the Specific Plan area are manufacturing, industrial, light industrial, industrial related and visitor serving uses and are not considered sensitive receptors.

Daytime glare sources may include exterior building materials such as glass and highly reflective façade materials and finishes. Surface paving materials and cars parked in surface lots are also sources of glare. The design guidelines recommend that building materials may be a combination of concrete, metal, limited glass and/or other contemporary composites. All fenestration would be of low glare reflectivity and any metal surfaces shall be brushed or matte and not highly reflective.

Nighttime sources of light from the proposed project will include vehicle headlights, streetlights, interior and exterior security building lights, parking lot and other security lighting. Design guidelines and site design and development standards are either required by the Specific Plan and/or required by City Code and ensure that there will not be excessive nighttime lighting beyond what is necessary for function and safety. Exterior lighting will be located and designed to minimize direct glare beyond the parking lot or service area. Illumination of landscape and pedestrian walkways shall be accomplished with low-level unobtrusive fixtures. There is a maximum height of 35 feet for light standards and exterior lighting in public areas will be independent of tenant control. Specific guidelines ensure that lighting for the new uses are strategically located to minimize the impact to adjacent properties. All proposed lighting shall comply with the City's Outdoor Lighting Code & Guidelines.

The Project would utilize state of the art anti-reflective materials to reduce glare and the potential for bird collision-related deaths on the building. In addition, the project would be consistent with the Sakioka Farms Specific Plan in its implementation of features to limit or avoid light spillage onto adjacent properties and reduce glare. Therefore, the Project would not significantly adversely affect day or nighttime views in the area, consistent with the findings of the Specific Plan EIR.

Specific Plan EIR Cumulative Impacts

Implementation of the Specific Plan, in conjunction with related projects, was found to result in cumulative changes to the visual environment in the areas surrounding the Project site. Individual projects are subject to review for conformance to current land use designations and zoning, and compatibility with surrounding land uses. Additionally, each related project is subject to independent environmental review. These procedures provide assurances that potential cumulative impacts related to the visual environment and scenic resources of the community are less than significant. The proposed e-commerce fulfillment center would not change this finding.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

No mitigation measures are required.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Impacts not Explicitly Analyzed in the Specific Plan EIR

In May 2017, the City adopted an updated CEQA Checklist to include threshold question four. Because the City's CEQA checklist was implemented after the adoption of the Specific Plan, impacts related to adding to or compounding an existing negative visual character associated with the project site were not explicitly discussed in the Specific Plan EIR.

4) Would the project add to or compound an existing negative visual character associated with the project site?

The Specific Plan area has historically been used for agriculture and the visual character is not considered to be negative as it currently exists. While development of the Specific Plan area would permanently alter the visual character of the site, the Specific Plan implements landscape guidelines to ensure the overall visual character of the area remains high or is improved. Project design guidelines would increase the visual quality of the Specific Plan area through contributing to the establishment of community identity at major entryways to Oxnard along transportation routes.

The proposed project would develop an approximately 64.65-acre portion of the 430-acre business park site, consistent with the development analyzed in the Specific Plan. The visual character of the new fulfillment center would be consistent with adjacent industrial and office land uses. While the project would permanently alter the visual character of the site, implementation of the project would involve adhering to design guidelines put forth in the Specific Plan and consistent with the spirit of the City's General Plan. Landscaping at the perimeters and throughout the site would soften the effects of the new development and would be consistent with the landscaping design for the Sakioka Farms Business Park. Project development would be therefore consistent with the Specific Plan and project implementation

would not compound an existing negative visual character. There would be no new or substantially more severe significant impact than what was anticipated under the Specific Plan.

Conclusion

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Aesthetics and Urban Design not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Aesthetics and Urban Design are not required.

3.2 Agricultural Resources

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	Significant	No	No
2) Conflict with existing zoning for agricultural use or an existing Williamson Act contract?	No impact	No	No
3) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of off-site farmland to non-agricultural use?	Significant	No	No

The Specific Plan EIR analysis determined the conversion of approximately 430 acres of agricultural lands to non-agricultural would have a significant and unavoidable impact, even with implementation of the mitigation included in the Specific Plan EIR. The City addressed the significant and unmitigable impact of converting important farmland to non-agricultural use by adopting a Statement of Overriding Considerations.

Setting

Ventura County has a long history of agricultural production. Oxnard is in the western part of the fertile Oxnard Plain. The City is bordered by agricultural production and greenbelts on three sides. The California Department of Conservation has developed a Farmland Mapping and Monitoring Program that classifies the different agricultural soil types related to their ability to sustain agricultural crops. The soil type classifications are prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, grazing land, urban and built-up land, and other land. Based on data published by the California Department of Conservation, in 2016 Ventura County had 40,976 acres of prime farmland, 32,992 acres of farmland of statewide importance, 28,950 acres of unique farmland, and 15,590 acres of farmland of local importance (California Department of Conservation 2016). The Specific Plan area,

located within the city limits, has historically been cultivated with strawberries, celery, cabbage, lettuce, and peppers.

Impact Discussion

1) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?

The Specific Plan area is classified as Prime Farmland and Farmland of Statewide Importance. Prime Farmland is defined as land that has the best combination of physical and chemical characteristics to produce crops. Farmland of Statewide Importance is defined as being like Prime Farmland, but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Approximately 99.7 acres of the Specific Plan area are classified as Prime Farmland with the remaining 323.7 acres designated as Farmland of Statewide Importance (City of Oxnard 2011b). Figure 12 shows the current prime farmland and farmland of State importance in the project area.

The Specific Plan EIR determined the Specific Plan area is classified as farmland of statewide importance (323.7 acres) and the conversion of all the existing agricultural land is considered significant and unavoidable. Mitigation Measure (MM) C-1 ensures that Prime Farmland agricultural soils are not lost if a feasible offer is made and accepted to relocate the topsoil. MM C-1 is being fulfilled by the project proponent processing the Specific Plan Tract Map. However, development of the Specific Plan area, including the proposed Project, will still result in the permanent conversion of a quality agricultural site to nonagricultural uses.

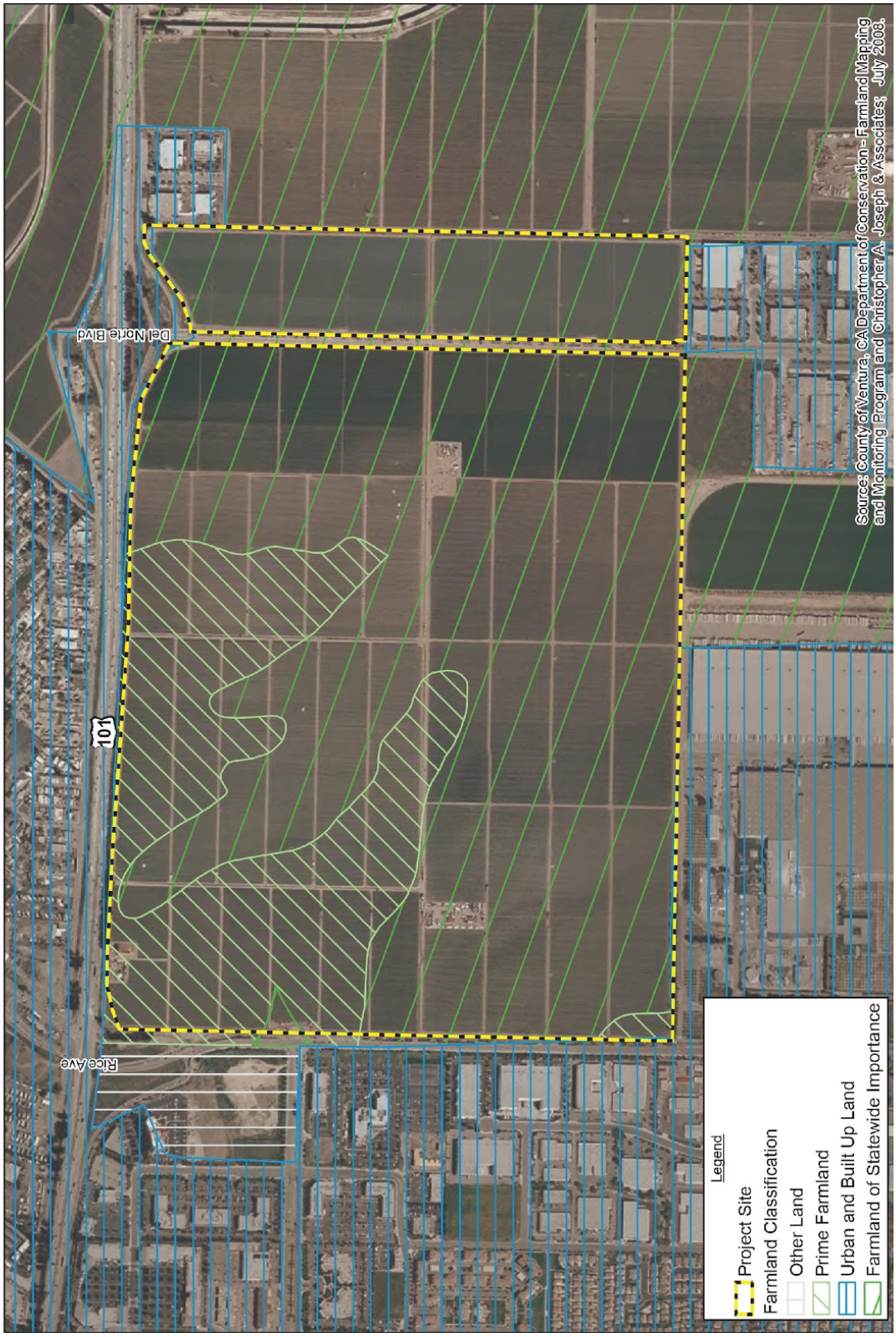
Development of the proposed e-commerce fulfillment center would be consistent with the Specific Plan and project implementation would not result in a new or substantially more severe significant impact to a quality agricultural site than what was anticipated under the Specific Plan.

2) Would the project conflict with existing zoning for agricultural use or an existing Williamson Act contract?

The California Land Conservation Act of 1965 (the "Williamson Act" – California Government Code Section 51200) recognizes the importance of agricultural land as an economic resource that is vital to the general welfare of society. The Specific Plan EIR found that the approximately 430-acre Specific Plan area was not subject to a Williamson Act contract. These circumstances have not changed. The proposed Project would be in line with the Specific Plan. Therefore, no impact would occur, consistent with the findings of the Specific Plan EIR.

Furthermore, as described in Section 1.2 *Setting*, the northern portion of the Specific Plan area is zoned BRP, where the site parallels US 101, between Rice Avenue and Del Norte Boulevard; the rest of the Specific Plan area is zoned M-1. While the entire Specific Plan area has traditionally been used for agricultural production, it is not zoned for agricultural use. The proposed Project would not change the underlying site zoning designation and would be in line with the Specific Plan. Therefore, no impact would occur, consistent with the findings of the Specific Plan EIR.

Figure 12. Important Farmlands in the Specific Plan Area



3) Would the project involve other changes in the existing environment that, due to their location or nature, could result in conversion of off-site farmland to non-agricultural use?

The Specific Plan area is located immediately west of agricultural land located in the unincorporated area of Ventura County. The Specific Plan EIR found potentially significant impacts to off-site farmland with the development of the eastern portion of the Sakioka Farms Business Park (e.g., Areas 6 and 7 east of Del Norte Boulevard) and potential conflicts between incremental Specific Plan development and the remaining on-site agricultural operations. The Specific Plan EIR included MM C-2 to reduce the potential impact by providing fencing and/or wall buffering between land uses. The proposed Project does not include development of property east of Del Norte Boulevard, and therefore, is not responsible for installing a fence or wall along the eastern perimeter of the Specific Plan area. However, fencing is required between the proposed Project and continuing agricultural operations adjacent to the Project site to the west, for as long as the adjacent use remains agricultural, pursuant to MM C-2 and consistent with the Specific Plan EIR.

Specific Plan EIR Cumulative Impacts

To the immediate east of the project site is the Camino Real Business Park Specific Plan, approved by the City in 2008 for up to 675,000 sf of Business Research and Light Industrial uses, like those in the Specific Plan. The cumulative conversion of the two adjacent sites of nearly 500 acres from agriculture to non-agricultural uses is a substantial loss of the agricultural land within the County of Ventura. The Specific Plan EIR found this to be a significant, unmitigated cumulative impact, as found in the Northeast Industrial EIR and 2030 General Plan EIR. Development of the proposed Project does not change this finding.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

The Specific Plan, together with other urban development projects in the city, even after application of the following mitigation measures, will result in a cumulative effect on agricultural resources that is considered significant and unavoidable. Accordingly, a Statement of Overriding Considerations was prepared in accordance with CEQA and included in the Resolution approving the Specific Plan.

In order to reduce impacts to Agricultural Resources to the extent feasible, the Specific Plan EIR imposed a number of mitigation measures. The following mitigation measures would apply to this individual Project:

MM C-2: This is an adaptive management mitigation measure. The Project developer shall install a fence or wall with a minimum height of eight (8) feet along the eastern perimeter of the project site that abuts the unincorporated portion of Ventura County when development is proposed east of Del Norte Boulevard. Fencing may be required between developed phases of the Project and continuing agricultural operations on the remaining Project site based on subsequent entitlement actions.

The following mitigation measure reduces the potential for employees of or visitors to commercial properties adjacent to agricultural property to be overly concerned or anxious regarding the use of agricultural chemicals on adjacent properties:

MM C-3: This is an adaptive management mitigation measure. In order to buffer onsite or offsite agricultural land uses and onsite nonagricultural uses, either of the following measures may be undertaken to allow application of scheduled Restricted Materials by an onsite or offsite farmer; (1) closure of the buildings during periods when restricted materials will be used on the adjacent farmland parcels or (2) notification, consistent with common-practice in Ventura County, of building occupants and/or building managers that normal farming activities will occur nearby from time to time and could include noise, mild dust, and odors; that inert and nontoxic substances are frequently used by farmers that should be of no concern to people nearby, and that actual chemical spray drift from farms is rare and should not be misperceived.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

The following Specific Plan EIR mitigation measure reduces the impact associated with the loss of the land from agricultural production; however, the mitigation measure does not apply to this individual Project:

MM C-1: This is an adaptive management mitigation measure. The project developer will offer, at cost, the top 12 inches of the Prime Farmland (approximately 100 acres) soils for relocation to a farm site or farm sites that have lower quality soils. The cost will include the suitable replacement soil, if needed for site improvements. This mitigation may occur in phases as the areas with Prime Farmland are incrementally developed.

Conclusion

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Agricultural Resources not already evaluated and disclosed in the Specific Plan EIR. No new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental documentation related to Agricultural Resources are not required.

3.3 Air Quality

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Conflict with population or other growth forecasts contained in the Ventura County AQMP or otherwise obstruct implementation of the Ventura County AQMP?	Less than significant	No	No
2) Violate any federal or state air quality standard or contribute substantially to an existing or projected air quality standard violation?	Less than significant with mitigation	No	No
3) Result in a net increase of any criteria pollutant in excess of quantitative thresholds recommended by the Ventura County AQMP?	Less than significant with mitigation	No	No
4) Expose sensitive receptors to pollutant concentrations exceeding state or federal standards or in excess of applicable health risk criteria for toxic air contaminants?	Less than significant with mitigation	No	No
5) Create objectionable odors affecting a substantial number of people?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No

The Specific Plan EIR determined each impact question to be less than significant or less than significant after mitigation. However, implementation of the Specific Plan will result in cumulative Air Quality impacts from a cumulatively considerable contribution to an existing or projected air quality violation.

The City addressed the significant and unmitigable impacts to Air Quality by adopting a Statement of Overriding Considerations.

Setting

Oxnard is in the South Central Coast Air Basin, which includes all of Ventura, Santa Barbara, and San Luis Obispo counties. The regional climate in the South Central Coast Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality in the South Central Coast Air Basin is influenced primarily by a wide range of emissions sources (population centers, heavy vehicular traffic, and industry) and meteorology.

The Specific Plan area has historically been agricultural land used to grow crops. Air pollutant emissions are generated by stationary and area-wide sources, such as groundwater well pump motors, farm equipment, and motor vehicle traffic traveling to and from the Specific Plan area.

Impact Discussion

1) Would the Project conflict with population or other growth forecasts contained in the Ventura County AQMP or otherwise obstruct implementation of the Ventura County AQMP?

The Specific Plan EIR found implementation of the Specific Plan would not conflict with population or other growth forecasts contained in Ventura County Air Pollution Control District's (APCD) 2007 Air Quality Management Plan (AQMP) or otherwise obstruct implementation of the AQMP. Impacts were found to be less than significant. The Ventura County APCD adopted an updated AQMP (2016 AQMP) in February 2017 (Ventura County APCD 2017).

The Ventura County APCD Assessment Guidelines discuss how a project can be found consistent with the applicable AQMP. The applicable AQMP for the Project area is the 2016 AQMP, adopted by the Ventura County APCD in 2017. According to the Ventura County APCD Assessment Guidelines, a project with estimated emissions of two pounds per day or greater of ROC or two pounds per day or greater of NOX that is found to be inconsistent with the AQMP will also have a significant cumulative adverse air quality impact.

There are four steps to determining consistency with the AQMP for projects located in growth areas:

1) Determine whether the Project conforms to the applicable General Plan;
2) Determine the current estimated population of the growth area;
3) Compare the current estimated population of the growth area population target for the next year. If the current estimated population of the growth area is below its next year's population target, and the Project conforms to the applicable General Plan designation, the Project is determined to be consistent with the AQMP;
4) If the current estimated population of the growth areas exceeds its next year's population target, the Project should be found to be inconsistent with the AQMP. Inconsistency with the AQMP is considered a significant cumulative adverse air quality impact.

As discussed below, the Project would exceed two pounds per day of ROC and NOX emissions. However, the proposed industrial development is consistent with the light industrial land use designation of the 2030 General Plan and the adopted land use designation of the Sakioka Farms Business Park Specific Plan. The Project site is currently vacant and the proposed development will not directly affect the population of the City. While the proposed Project would provide employment opportunities leading to employment growth, that employment growth was anticipated in the 2030 General Plan, and employment would likely come from the local worker pool. Furthermore, the Project is compatible with the neighborhood and land use pattern, as it is within the Specific Plan planning area. Therefore, the Project would not exceed the growth assumptions in the AQMP. Accordingly, the Project would not conflict with or obstruct implementation of the applicable air quality plans. As a result, this impact would be less than significant. The findings for the Project are consistent with those of the Specific Plan EIR.

2) Would the Project violate any federal or state air quality standard or contribute substantially to an existing or projected air quality standard violation?

Project-specific air quality analyses are required to determine if each project implemented under the Specific Plan EIR would generate any new, significant impacts beyond those identified in the Specific Plan EIR, or if they would increase the severity of impacts already identified in the Specific Plan EIR. The Specific Plan EIR analyzed criteria pollutant emissions using the URBEMIS 2007 model. Since the Specific Plan EIR was adopted, the California Emissions Estimator Model (CalEEMod) was released in February 2011 (with the latest version, 2016.3.2, released in 2017); the Ventura County APCD recommends using the latest version of CalEEMod for estimated emissions from proposed land use developments (Ventura County APCD 2017). Therefore, CalEEMod was used in the Project's Air Quality and Greenhouse Gas Emissions Analysis Report to estimate construction and operational emissions from the Project. The results of that analysis are summarized below.

Construction Emissions

Construction emissions are described as "short-term" or temporary in duration, lasting only as long as the actual construction; however, they have the potential to represent a significant short-term impact on air quality. Construction of the Project would result in the temporary generation of ROC and NO_x emissions from construction activities such as site preparation, grading, building construction, architectural coating, and asphalt paving. ROC emissions are mainly generated by exhaust emissions from construction vehicles and off-gas emissions associated with architectural coatings and asphalt paving. Construction-related NO_x emissions are primarily generated by exhaust emissions from heavy-duty construction equipment, material and haul trucks, and construction worker vehicles. Table 3 presents the Project's maximum daily construction emissions for each construction activity and during the entire construction duration using the worst-case summer or winter daily construction-related criteria pollutant emissions for each phase of construction.

Table 3. Project Construction Emissions

Construction Phase	Maximum Emissions (lbs/day) ROC	NO_2
2020		
Site Preparation	0.8	12.2
Grading	1.1	19.3
Building Construction	10.7	101.5
Paving	1.0	10.0
Overlapping Building Construction + Paving	11.7	111.5
2021		
Building Construction	9.8	92.4
Paving	1.0	10.0
Architectural Coating	28.1	1.9
Overlapping Building Construction + Paving + Architectural Coating	38.9	104.3
2020-2021		
Maximum Daily Emissions	**38.9**	**104.3**
Significance Threshold	**25**	**25**
Significant Impact?	**Yes**	**Yes**

Source: FirstCarbon 2020a

As required by the Specific Plan EIR, the Project would implement MM J-2 to reduce exhaust emissions during the construction period. Specific Plan EIR MM J-2 requires standard controls and regular maintenance of on-site equipment during construction. As shown in Table 3, even with implementation of the Specific Plan EIR mitigation measures and implementation of the best management practices in the construction emissions minimization, Project emissions would exceed the VCAPCD significance threshold for both ROC and NO_x. For a Project that emits more than 25 pounds of ROC or NO_x during construction, the VCAPCD requires implementation of feasible mitigation measures to result in a less than significant impact. Implementation of the Specific Plan EIR mitigation measures and the construction emissions minimization plan would satisfy this requirement would satisfy this requirement. Accordingly, this impact would be less than significant with the incorporation of mitigation. The findings for the Project are consistent with those of the Specific Plan EIR.

Operational Emissions

Following the construction of the Project, long-term emissions would be generated from day-to-day operations. Operational emissions for land use development projects are typically distinguished as mobile-, area-, and energy-source emissions. Table 4 presents the Project's maximum daily operational emissions.

Table 4. Project Operational Emissions

Source	Maximum Emissions (lbs/day)	
	ROC	NO_2
Area	79.3	0.00
Energy	0.3	3.0
Mobile - Passenger Cars	5.5	7.0
Mobile - Trucks	1.3	45.4
Stationary Source (Emergency Generator)	2.0	7.2
Total Daily Project Emissions	**88.1**	**61.6**
Significance Threshold	**25**	**25**
Significant Impact?	**Yes**	**Yes**

Source: FirstCarbon 2020a

As shown in Table 4, the operational emissions from the Project would exceed the VCAPCD's operational thresholds for both ROC and NOx. Mitigation measures from the Specific Plan EIR that would be implemented to reduce emissions of ROC and NOx from long-term operation include MM J-3, MM J-4, and MM J-6. At the time of this analysis, the precise emission reductions associated with Specific Plan EIR MM J-3 and MM J-4 cannot be accurately determined because of a lack of sufficient information about how the Project would operate and to what extent the measure would affect those activities. Therefore, even with the incorporation of MM J-3 and J-4 of the Sakioka Farms Specific Plan, the Project's long-term operational ROC and NOx emissions would continue to exceed VCAPCD thresholds of significance. As required by MM J-6 of the Sakioka Farms Specific Plan, the Project would be required to contribute to a cumulative impacts mitigation "buy-down" fund. The City will determine the specific amount to be contributed by the Project. The Project's anticipated contributions to the mitigation "buy-down" fund would offset the operational emissions. Therefore, the Project would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. This impact would be less than significant with the incorporation of mitigation. The findings for the Project are consistent with those of the Specific Plan EIR.

3) Would the Project result in a net increase of any criteria air pollutant in excess of quantitative thresholds recommended by the VCAPCD?

The response to this question is incorporated in the response to the previous question.

4) Would the Project expose sensitive receptors to pollutant concentrations exceeding state or federal standards or in excess of applicable health risk criteria for toxic air contaminants?

This impact evaluates the potential for the Project's construction and operational emissions to expose sensitive receptors to substantial pollutant concentrations of carbon monoxide, naturally occurring asbestos, Valley fever, or other toxic air contaminants (TACs) of concern (including diesel particulate matter (DPM). The nearest residential land uses are located over 2,000 feet north of the Project site across U.S. 101. Therefore, this analysis examines potential exposure of off-site sensitive receptors from the development of the Project.

Construction Fugitive Dust

During construction, fugitive dust (primarily PM_{10} fugitive dust) would be generated from site grading and other earth-moving activities. Fugitive PM dust emissions are primarily associated with earth disturbance and grading activities, and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on- and off-site. The majority of this fugitive dust will remain localized and will be deposited near the project site. The VCAPCD does not have a quantitative significance threshold for fugitive dust. The VCAPCD's Air Quality Guidelines recommend minimizing the generation of fugitive dust, especially during grading and excavation operations, rather than requiring the quantification of fugitive dust emissions. The Project would be required to implement applicable mitigation measures from the Specific Plan EIR for fugitive dust control, such as MM J-1. Implementation of MM J-1 from the Specific Plan EIR reduces the Project's construction-generated fugitive dust impact to a less than significant level. The findings for the Project are consistent with those of the Specific Plan EIR.

CO Hotspots

CO "hot spot" thresholds ensure that emissions of CO associated with traffic impacts from a project in combination with CO emissions from existing and forecasted regional traffic do not exceed State or federal standards for CO at any traffic intersection impacted by the Project. Project concentrations may be considered significant if a CO hot spot intersection analysis determines that project generated CO concentrations cause a localized violation of the state CO 1-hour standard of 20 parts per million (ppm), state CO 8-hour standard of 9 ppm, federal CO 1-hour standard of 35 ppm, or federal CO 8-hour standard of 9 ppm. The VCAPCD recommends a CO hotspot analysis using the screening procedure in Caltrans' CO Protocol should be conducted for any project with indirect emissions greater than the applicable ozone project significance thresholds that may significantly impact roadway intersections that are currently operating at, or are expected to operate at, Levels of Service (LOS) E or F.

Based on the Project's traffic assessment, with the intersection improvements specified in the Specific Plan EIR, all intersections that could be potentially impacted by the project would operate at LOS levels

of "C" or better. Therefore, a CO hotspot assessment is not required and the potential CO impacts from the Project are less than significant.

Naturally Occurring Asbestos

Construction in areas of rock formations that contain naturally occurring asbestos could release asbestos into the air and pose a health hazard. According to the Project's Air Quality and Greenhouse Gas Emissions Analysis Report, a review of the map containing areas more likely to have rock formations containing naturally occurring asbestos in California indicates that there are no areas likely containing naturally occurring asbestos in the immediate project area. Therefore, the project would not expose sensitive receptors to naturally occurring asbestos during construction. Impacts would be less than significant

Valley Fever

Valley fever, or coccidioidomycosis, is an infection caused by inhalation of the spores of the fungus, *Coccidioides immitis*. The spores live in soil and can live for an extended time in harsh environmental conditions. Activities or conditions that increase the amount of fugitive dust contribute to greater exposure, and they include dust storms, grading, and recreational off-road activities. The Project site is currently developed with agricultural land uses that have been disturbed via cultivation. Soil that has been cultivated and fertilized does not provide suitable habitat for the spores. Therefore, the implementation of the Project would have a low probability of the site having valley fever growth sites and exposure to the spores from disturbed soil. Construction activities would generate fugitive dust that could contain *Coccidioides immitis* spores. The Project will minimize the generation of fugitive dust during construction activities by complying with the VCAPCD Rule 55—Fugitive Dust. As discussed above, MM J-1 of the Specific Plan EIR is required to reduce fugitive dust impacts during construction of the project. Therefore, implementation MM J-1 of the Specific Plan EIR, combined with the relatively low probability of the presence of *Coccidioides immitis* spores, would reduce Valley fever impacts during the construction period to a less than significant level.

During operations, dust emissions are anticipated to be negligible, because most of the project area would be occupied by a distribution center building, pavement, and landscaped areas. This condition would preclude the possibility of providing habitat suitable for *Coccidioides immitis* and for generating fugitive dust that may contribute to Valley fever exposure. Impacts would be less than significant.

Toxic Air Contaminants

Construction-related activities would result in short-term, Project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing), building construction, and other miscellaneous activities. Maximum PM_{10} and $PM_{2.5}$ emissions would occur during site preparation and grading/excavation activities, which require the largest number of heavy-duty diesel equipment. This period is expected to last less than two months. PM emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. While the maximum DPM emissions associated with grading/excavation activities would only occur for a portion of the overall construction

period, this activity represents the highest DPM emissions for the total construction period. This construction period would represent less than one percent of the total 70-year lifetime exposure period commonly used to estimate long-term cancer health risks. Furthermore, the nearest residential land uses are located over 2,000 feet north of the Project site across Highway 101. Therefore, because of the short exposure period, the distance from the Project site to the nearest sensitive receptor, diesel engine retrofits, and new low-emission diesel engine types, DPM generated by Project construction would not create conditions that result in a significant health risk to sensitive receptors. Impacts from construction TACs would be less than significant.

The CARB Air Quality Land Use Handbook indicates that there is a 70-percent drop off in particulate pollution levels at 500 feet. Although vehicle trips generated by the Project may come within 500 feet of nearby sensitive receptors, emissions from vehicles would be dispersed along roadways. Considering the distance from the Project site (where emissions could reasonably be assumed to be the most concentrated) to the nearest sensitive receptors, operational Project-related TAC exposure impacts to these off-site sensitive receptors would be below the established thresholds during operation of the project. Impacts from operational TACs would be less than significant.

Specific Plan EIR Cumulative Impacts

Cumulative development in the Oxnard Growth Area is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of, the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within Ventura County, to return clean air to the region, and to minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, if growth in the Oxnard Growth Area is within the projections for growth identified in the AQMP, implementation of the 2016 AQMP will not be obstructed by such growth. As growth in the Oxnard Growth Area is not expected to exceed these projections in 2030, this impact would not be cumulatively considerable. Additionally, since the Specific Plan is consistent with growth projections under the 2016 AQMP, the Specific Plan will not have a cumulatively considerable contribution to this impact regarding conflict with or obstruction of the implementation of the applicable air quality plan.

Cumulative development in Oxnard will continue to implement dust control and equipment emissions mitigation measures during construction in accordance with City practices. Consequently, cumulative development in Oxnard is not expected to cause a significant impact associated with construction activities. Because the Project would implement all appropriate mitigation measures during construction and operation, the contribution of the site improvements to any cumulative air quality impact would not be considerable.

As identified above, implementation of the Project would not expose sensitive receptors to substantial pollutant concentrations of carbon monoxide, naturally occurring asbestos, Valley fever, or other TACs. Discussion of these impacts considers the cumulative nature of TACs. Therefore, the project would not

expose sensitive receptors to a cumulatively considerable amount of substantial pollutant concentrations from TACs.

Impacts not Explicitly Analyzed in the Specific Plan EIR

In May 2017, the City adopted an updated CEQA Checklist that included threshold question five. Because the City's CEQA checklist was implemented after the adoption of the Specific Plan, impacts related to objectionable odors from the Project site affecting a substantial number of people were not explicitly discussed in the Specific Plan EIR.

5) Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

Project construction could generate odors associated with heavy-duty equipment operation and earth-moving activities. Such odors would be temporary in nature and limited to the duration of construction in the vicinity of a given site along the project's alignment. Therefore, Project construction would not expose sensitive receptors to substantial odors. Impacts would be less than significant.

The Project would not engage in any activities that would define the Project as an odor generator as identified by VCAPCD. The Project's short-term construction activities and long-term operational activities would not have any substantial odor sources that would expose nearby sensitive receptors. Considering the low intensity of potential odor emissions, the Project's operational activities would not expose receptors to objectionable odor emissions. Impacts would be less than significant.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

The Specific Plan, together with other pending urban development projects in Oxnard which, even after application of the following mitigation measures, will result in a cumulative effect on GHG emissions and continuing Basin air quality nonattainment that is considered significant and unavoidable. Accordingly, a Statement of Overriding Considerations was prepared in accordance with CEQA and included within the resolution approving the Specific Plan.

However, in order to reduce GHG emission to the extent feasible, the Specific Plan EIR imposed a number of mitigation measures. The following mitigation measures would apply to this Project:

MM J-1: This is an adaptive management mitigation measure. The Project developer shall implement fugitive dust control measures throughout all phases of construction. The Project developer shall include in construction contracts the control measures required and recommended by the Ventura County APCD at the time of development. These measures, like all EIR mitigation measures, are binding on subsequent parties and developers. Examples of the types of measures currently required and recommended include the following:

- Minimize the area disturbed on a daily basis by clearing, grading, earthmoving, and/or excavation operations.

- Pre-grading/excavation activities shall include watering the area to be graded or excavated before the commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during these activities.
- All trucks shall be required to cover their loads as required by California Vehicle Code §23114.
- All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary.
- Material stockpiles shall be enclosed, covered, stabilized, or otherwise treated, to prevent blowing fugitive dust off site.
- Graded and/or excavated inactive areas of the construction site shall be monitored by a City-designated monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.
- Signs shall be posted on the site limiting onsite traffic to 15 miles per hour or less.
- During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either off site or on site. The site superintendent/supervisor shall use his/her discretion in conjunction with the Ventura County APCD in determining when winds are excessive.
- Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.
- Personnel involved in grading operations, including contractors and subcontractors should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

MM J-2: The Project developer shall implement measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the Project site throughout the Project construction phases. The Project developer shall include in construction contracts the control measures required and recommended by the Ventura County APCD at the time of development. Examples of the types of measures currently required and recommended include the following:

- Maintain all construction equipment in good condition and in proper tune in accordance with manufacturer's specifications.
- Limit truck and equipment idling time to five minutes or less.
- Minimize the number of vehicles and equipment operating at the same time during the smog season (May through October).
- Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, to the extent feasible.

MM J-3: This is an adaptive management mitigation measure. The Project developer shall include in construction and building management contracts one or more of the following requirements or other measures shown to be equally effective:

- Use solar or low-emission water heaters in new buildings where feasible and as in common practice in similar new construction in the Oxnard area.
- Require that commercial landscapers providing services at the common areas of Project site use electric or battery-powered equipment, or other internal combustion equipment that is either certified by the California Air Resources Board or is three years old or less at the time of use, to the extent that such equipment is reasonably available and competitively priced in Ventura County (meaning that the equipment can be easily purchased at stores in Ventura County and the cost of the equipment is not more than 20 percent greater than the cost of standard equipment).
- Provide bus stop pull-out areas, and/or shelters at locations along and within the Project site. The number and location of bus stops shall be determined in consultation with Gold Coast Transit and the City Traffic Engineer. Cumulative air quality impact fees (see Mitigation J-6) paid by the Project developer or subsequent interests may be used for some or all of these structures or as credits against the fee and/or to be funded from the fee fund consistent with the City's practice with other projects with similar transit-oriented mitigation requirements.

MM J-4: This is an adaptive management mitigation measure. A Project-wide Transportation Demand Management (TDM) program shall be prepared by a qualified consultant for review by the Development Services Director within one year of the recordation of the first Final Tract Map and implemented on a phase by phase basis thereafter. The TDM program shall incorporate best and commonly used trip-reduction incentives, programs, and practices found in TDMs of similar projects in terms of allowed uses, size, and transportation and transit service context. The TDM shall, to the maximum extent financially feasible or practical, be coordinated and consistent with Gold Coast Transit service planning, development and/or final adoption of a regional and/or Oxnard Sustainable Communities Strategy (under SB 375), and TDMs or similar efforts of surrounding businesses and organized business and commercial organizations, including but not limited to, the Camino Real Business Park; Proctor and Gamble; Riverpark (The Collections); The Esplanade; The Village; Oxnard Auto Center Dealers Associations; and the McGinnes Ranch, Northgate, and Seagate business parks. The TDM shall include an

estimate of Project vehicular trips; a target reduction; a strategy and timeline to achieve the target; and one or more means of an independent sustainable funding program to administer, monitor, and routinely update the TDM program. At the discretion of the City Traffic Engineer based on applicable professional practice, documented and sustained TDM-attributable trip reductions shall be incorporated into future Project-related traffic studies and/or analyses for purposes of calculating traffic fees and/or modifying traffic-related mitigations. The TDM may be implemented on a phase-by-phase basis.

MM J-5: This is an adaptive management mitigation measure. The Specific Plan shall include a requirement that all structures with a flat or nearly flat roof area of over 10,000 square feet shall be designed with roof systems capable of supporting equipment that generates electricity from sunlight and/or wind if economically feasible and subject to review by the Fire Department. The roof systems may be designed to service the building and/or enter into a commercially reasonable public or private utility agreement for purposes of generating energy or transmission.

MM J-6: This is an adaptive management mitigation measure. The Project developer shall contribute to a cumulative impacts mitigation "buy-down" fund managed by the City based on the Ventura County Air Pollution Control District fee schedule effective at the time a building permit is issued. The fee contribution shall be assessed and paid incrementally as individual buildings are developed. The fee is allocated based on each development's share of ADT for the Project buildout. The ADT shall be recalculated annually by the City Traffic Engineer or upon request of the Project developer with a payment of a fee determined by the City Traffic Engineer that covers actual time and material costs to the City. The City shall consider transit and traffic demand management improvements and programs suggested by the Project developer, in excess of those otherwise required, as credits against the fee and/or to be funded from the fee fund.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusion

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Air Quality not already evaluated and disclosed in the Specific Plan EIR. No new mitigation measures not adopted by the Project proponent, due to Project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Air Quality are not required.

3.4 Biological Resources

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to Project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant with mitigation	No	No
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations adopted by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant with mitigation	No	No
3) Have a substantial adverse effect on federally protected waters of the United States, as defined by Section 404 of the Clean Water Act, or protected waters of the State, as defined by Section 1600 et seq. Of the California Fish and Game Code (including, but not limited to, marshes, vernal pools, and coastal wetlands) through direct removal, filling, hydrological interruption, or other means?	Less than significant with mitigation	No	No
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife	Less than significant with mitigation	No	No

species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			
5) Conflict with any local policies or ordinances protecting biological resources?	No impact	No	No

The potential impacts to Biological Resources associated with the Specific Plan area were determined to be less than significant with mitigation in the Specific Plan EIR. The Specific Plan EIR also found that Specific Plan implementation, in combination with the other related projects identified in the area plus regional growth, would contribute to significant cumulative impacts to Biological Resources, specifically migratory birds and jurisdictional features. Impacts on Biological Resources were found to be less than significant with mitigation meant to avoid, minimize, or compensate for such impacts.

Setting

The Specific Plan area has been used for agricultural production historically. The site's agricultural nature and the industrial and agricultural uses in surrounding areas preclude the presence of significant non-agricultural vegetation. Irrigation drainage ditches are located along the perimeter of the agricultural fields. Drainage varies in structure and hydrology and are not natural hydrological features but have been created for agricultural purposes. The Specific Plan EIR identified two vegetation communities on site: agricultural and upland/non-native. Although some riparian vegetation was present in the eastern ditch, it was not classified as an additional vegetation community as it was not large enough to be considered a separate community.

According to the Specific Plan EIR, no sensitive or special-status species were determined to be present on the site during April 2007 or June 2009 surveys. The Specific Plan EIR found there was low potential for special-status species to occur on site due to lack of habitat. However, eucalyptus trees growing adjacent to the northern edge of the site, and the few willows and mulefat specimens on site were determined to provide suitable nesting habitat for birds, including migratory birds, which are considered sensitive species as their nesting activities are protected under the Fish and Game Code and the Federal Migratory Bird Treaty Act.

FirstCarbon Solutions prepared a Project-level Biological Resources Assessment (BRA) on March 27, 2020 (First Carbon 2020a). The BRA summarizes the findings of a literature search, a general biological resources reconnaissance survey (conducted by Senior Biologist, Ricardo Montijo, on February 19 and 25, 2020), and a jurisdictional delineation. The findings of the BRA are used herein to support this discussion and are incorporated by reference.

The Specific Plan EIR includes mitigation for potential biological resource impacts from future development in the Plan Area by requiring Project-level analysis. Therefore, FirstCarbon Solutions (FCS) prepared a Project-level Biological Resources Assessment (BRA) for the Project on March 27, 2020. The

BRA summarizes the findings of a literature search, a general biological resources reconnaissance survey (conducted by Senior Biologist, Ricardo Montijo, on February 19 and 25, 2020), and a jurisdictional delineation. The findings of the BRA and jurisdictional delineation are used herein to support this discussion and incorporated by reference.

The analysis performed for the Project would not result in any new or more severe impacts compared to the Specific Plan EIR, and all impacts on biological resources would be reduced to a less than significant level with implementation of relevant mitigation identified in the Specific Plan EIR. As no jurisdictional features or trees are located within the Project site, MM E-3 and MM E4, and MM E-5 are not applicable to the Project.

Impact Discussion

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

The Specific Plan EIR found that impacts to species identified as a candidate, sensitive, or special- status species would be less than significant with mitigation incorporated. The Specific Plan EIR included mitigation requiring pre-construction nesting bird surveys on the site if construction activity will occur during the nesting bird season. This mitigation measure is provided herein and will be implemented by the proposed Project.

The Special-status Plant Species Table (Appendix D.1 of the BRA) identified special-status plant species that occur within 5 miles of the Project site, as recorded by the California Natural Diversity Database and California Native Plant Society and identified as part of the literature review for the BRA (FirstCarbon Solutions 2020a). None have been recorded in the Project site area. Five special-status plant species, Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), salt marsh bird's-beak, Ventura marsh milk-vetch, and Coulter's goldfields have the potential to occur in the Project site area, but the site lacks the habitat needed to support these species (alkaline soils, wetland-riparian areas, marshes, swamps, riparian woodland, and vernal pools). Based on a lack of suitable habitat, all special-status plant species were determined unlikely to occur on site.

The Special-status Wildlife Species Table (Appendix D.2 of the BRA) identifies federal and State-listed threatened and/or endangered wildlife species, and State Species of Special Concern recorded in the California Natural Diversity Database as occurring within 5 miles of the Specific Plan area. Occurrences of western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), California black rail (*Laterallus jamaicensis coturniculus*), least Bell's vireo (*Vireo bellii pusillus*), Southern California legless lizard (*Anniella stebbinsi*), and Santa Ana sucker (*Catostomus santaanae*) have been recorded within 5 miles of the Project site. All special-status wildlife species were determined unlikely to occur on site, primarily based on the absence of suitable habitat, as most of the Project site contains cultivated agricultural fields and is surrounded by non-native grassland.

Special-status species are known to occur within 5 miles of the Project site (Appendix D.2 of the BRA). These occurrences include the burrowing owl (*Athene cunicularia*), western pond turtle (*Emys marmorata*), and California horned lark (*Eremophila alpestris actia*). Currently, habitats for burrowing owl or western pond turtle are not present in the Project site area. The Project site lacks ground squirrel burrows, is actively disked for agricultural purposes, and does not contain perennial water, which precludes burrowing owl and western pond turtle, respectively. However, because the site has been actively disked, burrowing owl could eventually inhabit the site if fields are left in fallow states. However, as previously mentioned, no occurrences of special-status species, including burrowing owl, have been recorded within the site and none were observed during the field survey. Because the site is planned to be utilized for future development, this precludes the possibility of burrowing owl inhabiting the site.

The BRA also concluded that the open agricultural fields found in the Project area provide marginal nesting habitat for common ground nesting birds protected under the Migratory Bird Treaty Act, and other special-status birds. However, as was found in the Specific Plan EIR, potential impacts may occur to resident and migratory species during Project site improvements that would render the Project temporarily unsuitable for nesting birds because of the noise, vibration, and increased activity levels associated with various construction activities. These activities could subject birds to risk of death or injury, and they are likely to avoid using the area until such construction activities are finished. To reduce potential impacts to Migratory Bird Treaty Act-protected and other special-status birds, MM E-1 requires vegetation removal outside of nesting season or the presence of a qualified ecologist/biologist to monitor any vegetation removal during the nesting season, which would reduce impacts to a less than significant level.

Development of the proposed e-commerce fulfillment center would be consistent with the Specific Plan and Project implementation would not result in a new or substantially more severe significant impact to any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service than what was anticipated under the Specific Plan. The Project would be required to comply with MM E-1.

2) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations adopted by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The response to this question is incorporated in the response to the next question.

3) Would the Project have a substantial adverse effect on federally protected waters of the United States as defined by Section 404 of the federal Clean Water Act or protected waters of the State as defined by Section 1600 et seq. of the California Fish and Game Code (including, but not limited to, marshes, vernal pools, and coastal wetlands) through direct removal, filling, hydrological interruption, or other means?

The Specific Plan EIR concluded that impacts on any riparian habitat or other sensitive natural community were less than significant with mitigation incorporated. The Specific Plan EIR included three mitigation measures requiring that individual projects must conduct jurisdictional delineations to

determine the presence of jurisdictional and riparian features, as well as the implementation of precautions for those features if they exist on site (Specific Plan EIR MM E-2 through MM-E-4). The Specific Plan EIR further found the Specific Plan would have a less than significant impact on federally protected waters of the United States as defined by Section 404 of the federal Clean Water Act or protected waters of the State as defined by Section 1600 et seq. of the California Fish and Game Code with mitigation incorporated (Specific Plan EIR MM E-2 through MM E-4).

An assessment of potentially jurisdictional features was conducted as part of the BRA literature review and field survey on February 19 and 25, 2020, consistent with the requirements of Specific Plan EIR MM E-2. No wetlands or other hydrological features that meet criteria as waters of the United States were observed within the proposed Project site or overall survey area. While small agricultural irrigation ditches are located to the north, east, and south of the Project area, none of the ditches are within the Project site boundary. Furthermore, the major stream identified in the BRA is more than 500 feet east of the Project site. These conditions negate the necessity for the proposed Project to implement MM E-3 and MM E-4.

The findings for the proposed Project differ from the findings of the Specific Plan EIR due to the lack of protected waters of the United States and of the State on-site. There would be no impact. Therefore, development of the proposed e-commerce fulfillment center would be consistent with the Specific Plan and Project implementation would not result in a new or substantially more severe significant impact to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service than what was anticipated under the Specific Plan.

4) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The Specific Plan EIR found that the Specific Plan would have less than significant impacts with the implementation of mitigation to minimize interference with the movement of any native resident or migratory fish or wildlife species. The Specific Plan EIR included measure E-5, which required that a qualified biologist determine the presence or absence of the monarch butterfly in eucalyptus trees. Specific Plan EIR MM E-5 lays out precautions for eucalyptus tree removal in Planning Area 1. Any future projects developed on parcels in Planning Area 1 will need to satisfy the requirements of MM E-5. The proposed Project would not occur in Planning Area 1 of the Specific Plan area and therefore, is not required to implement this mitigation measure.

5) Would the Project conflict with any local policies or ordinances protecting biological resources?

The response to this question is incorporated in the response to the next question.

6) Would the Project conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

The Specific Plan EIR found no conflict with any local policies or ordinances protecting biological resources. The Specific Plan area is not subject to any habitat or natural community conservation plan. The proposed Project is consistent with these findings. There would be no impact.

Specific Plan EIR Cumulative Impacts

The Specific Plan EIR found that implementation of the Specific Plan, in combination with the other related projects identified in the area plus regional growth, will contribute to significant cumulative impacts to Biological Resources. However, with the implementation of the recommended mitigation measures, the Specific Plan's contribution to those impacts will not be cumulatively considerable, and therefore, will be less than significant. Development of the proposed Project does not change this finding.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

In order to reduce impacts to Biological Resources to the extent feasible, the Specific Plan EIR imposed a number of mitigation measures. The following mitigation measure would apply to this Project:

MM E-1: This is an adaptive management mitigation measure. In order to avoid adverse impacts to nesting birds, including nesting migratory birds known to exist in the trees (if any) on the Project site, during construction activities, ground vegetation removal activities must take place outside of the nesting season recognized by the California Department of Fish and Game (CDFG) for species in this area. If vegetation removal activities occur during the nesting season, a qualified ecologist/biologist must be present to monitor the removal activities to ensure that no active nests will be impacted. If nests are found, a 300-foot buffer radius (500-foot for raptors) shall be established until the young have fledged. If nests are observed and lesser buffer distances are desired, the biological monitor shall confer with Planning and Fish and Game staff to determine an appropriate buffer distance based on species specific requirements. This measure does not apply to agricultural row crops.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

The following Specific Plan EIR mitigation measure reduces the impact associated with the impacts to Biological Resources; however, these mitigation measures do not apply to this individual Project:

MM E-2: This is an adaptive management mitigation measure. Prior to processing the initial tract map for a planning area that could lead to construction activities that may result in the placement of fill material into the potentially jurisdictional irrigation drainage features, prepare and submit to the USACE for verification a "Preliminary Delineation Report for Waters of the U.S." and a Streambed Alteration Notification package to CDFG for the irrigation drainage features. If these agencies determine that the feature is not regulated under their jurisdiction, then no further mitigation is necessary. However, if the

USACE considers the feature to be jurisdictional through a "significant nexus" test per recent USACE and U.S. Environmental Protection Agency guidance[1], then a Clean Water Act Section 404 permit shall be obtained from the USACE, and any permit conditions shall be agreed to, prior to the start of construction activities in the affected area. If CDFG determines that the drainage is a regulated "streambed", then a Streambed Alteration Agreement shall be entered into with CDFG and any associated conditions shall be agreed to prior to the start of construction in the affected area.

MM E-3: This is an adaptive management mitigation measure. In order to prevent unauthorized impacts to jurisdictional features, the following permits shall be issued and/or reports approved (or exemptions issued) by the respective resource agency, and any associated conditions of approval shall be agreed upon, prior to processing the initial tract map for a planning area that could lead to construction activities that may result in the placement of fill material into the potentially jurisdictional irrigation drainage features, subsequent to adoption of the Project (i.e., Specific Plan):

- Clean Water Act Section 404 Permit from the USACE
- Streambed Alteration Agreement under Section 1600 of the CDFG Fish and Game Code
- Clean Water Act Section 401 Water Quality Certification or Waste Discharge Requirements from the Regional Water Quality Control Board

If the irrigation ditches are determined as jurisdictional by the USACE, it will be necessary to insure adequate compensation for adverse impacts to jurisdictional features from Project development. If applicable, a qualified biologist shall prepare a Mitigation Plan, which shall describe and justify the (1) formal delineation; (2) proposed methods including timing, materials, and erosion control measures; (3) the proposed location for the replacement areas; and (4) habitat protection measures (including a mechanism for permanent preservation of the area supporting the replacement habitat). The Mitigation Plan shall be submitted to and approved by the County, USACE, CDFG, and Regional Water Quality Control Board prior to initiation of construction activities.

MM E-4: This is an adaptive management mitigation measure. If required to compensate for riparian habitat loss by the USACE, the Project applicant will place under conservation easement in a manner acceptable to the USACE and the California Department of Fish and Game an area of riparian habitat that will accommodate constructed replacement at a ratio to be determined during the formulation of a Lake and Stream Alteration Agreement (i.e., a number of acres of constructed riparian habitat). This conserved riparian habitat must be of the same or higher quality as the habitat that is to be removed as a result of the Project.

-- or --

The Project applicant will purchase the requisite number of credits from a qualified conservation bank. The Project applicant can only purchase credits from those banks that sell credits covering the riparian species to be affected by the Specific Plan or as approved by the USACE or agency of jurisdiction.

[1] U.S. Environmental Protection Agency and U.S. Department of the Army. 2007. Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in Rapanos v. United States & Carabell v. United States. June 5, 2007.

MM E-5: This is an adaptive management mitigation measure. Prior to construction of the Planning Area 1, located adjacent to the Ventura Freeway, a qualified ecologist/biologist shall determine the presence and extent/absence of monarch butterfly activity surrounding the proposed construction area if any mature windrow trees are present. If temporary aggregation activity is observed within this area, construction shall be halted until after the temporary aggregation season (September – December) or until the monarchs have left the vicinity.

Conclusion

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Biological Resources not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the Project proponent, due to Project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Biological Resources are not required.

3.5 Climate Change & Greenhouse Gas Emissions

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to Project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant with mitigation	No	No
2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases or otherwise conflict with state goals for reducing GHG emissions in California?	Less than significant with mitigation	No	No
3) Contribute to or be subject to potential secondary effects of climate change (e.g., sea level rise, increased fire hazard)?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No

The Specific Plan EIR found the implementation of the Specific Plan would have less than significant impacts on a Project-level basis for impacts relating to GHG emissions. The Specific Plan EIR addressed GHG emissions impacts by analyzing the Specific Plan's consistency with applicable policies and strategies aimed to reduce GHG emissions. As addressed in the Specific Plan EIR, the Specific Plan would be consistent with all applicable policies adopted for the purpose of reducing GHG emissions. Impacts were found to be less than significant. Project-specific GHG analyses would be required to determine whether each individual Project would contribute or be subject to potential secondary effects of Climate Change or result in significant impacts related to GHG emissions. Cumulative GHG impacts were found to be significant and unavoidable. The City addressed the significant and unmitigable impacts related to GHGs by adopting a Statement of Overriding Considerations.

Setting

The entire Specific Plan area is currently active agricultural land used to grow crops. GHG emissions would be generated by stationary and area-wide sources, such as groundwater well pump motors, farm equipment, and motor vehicle traffic traveling to and from the Specific Plan area.

Impact Discussion

1) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The response to this question is incorporated within the response to the next question.

2) Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases or otherwise conflict with state goals for reducing GHG emissions in California?

The City of Oxnard acknowledges that the Ventura County APCD has not adopted a numerical threshold to use in performing quantitative analyses, but recognizes that there are several methods of analyzing quantified GHG emissions applied by various agencies throughout California. Although the City of Oxnard does not recommend a specific numerical threshold, it does recommend that GHG emissions be quantified, and development projects assessed for consistency with policies aimed to reduce GHG emissions. The City of Oxnard specifically recommends performing a qualitative assessment of the degree of consistency with applicable policies aimed to reduce GHG emissions should form the basis for assessing GHG emissions. Therefore, the significance determinations for impacts related to the Project GHG emissions are based on the Project's consistency with applicable policies aimed to reduce GHG emissions (GHG impact thresholds 1 and 2). Applicable policies include CARB's 2017 Scoping Plan (CARB 2017) and the City of Oxnard 2030 General Plan. In addition, for informational purposes, project-related GHG emissions have been quantified for construction and operational emissions.

Construction Emissions

Construction-related GHG emissions would occur from fossil fuel combustion for heavy-duty construction equipment, material delivery and haul trucks, and construction worker vehicles. Table 5 presents the project's total construction-related GHG emissions and amortized construction emissions.

Table 5. Estimated Construction Emissions of GHGs

Construction Year	Annual Emissions (MT CO_2e)
2020	1,111
2021	3,718
Total	4,829
Amortized over 30 years	161

Source: FirstCarbon 2020a

Operational Emissions

Following construction, long-term operational emissions would be generated from area-, energy-, and mobile-source emissions. As described in Section 4, indirect GHG emissions associated with water consumption and solid waste disposal would also be generated by the proposed development. Table 6 presents the Project's annual operational emissions along with the amortized construction emissions. As shown , the Project's unmitigated annual operational plus amortized construction emissions would generate 15,083 MT CO_2e per year before the application of mitigation. Implementation of MM J-3 through MM J-6 of the Specific Plan EIR would reduce the project's long-term operational GHG emissions.

Table 6. Estimated Operational Emissions of GHGs

Emissions Source	Annual Emissions (MT CO_2e)
Area	0
Energy	3,622
Mobile - Passenger Cars	4,111
Mobile - Trucks	2,883
Waste	1,331
Water	2,950
Stationary Source (Emergency Generator)	23
Amortized Construction	161
Total Project Emissions	**15,083**

Source: FirstCarbon 2020a

Table 7 shows the project emissions after the incorporation of mitigation. As shown, the project's long-term operational GHG emissions are estimated at 11,955 MT CO_2e per year after the incorporation of MM J-3 through MM J-6 of the Sakioka Farms Specific Plan EIR. As discussed in Air Quality, the project would be required to mitigate ROC and NO_x emissions through payment to a TDM fund (as required by Specific Plan EIR MM J-6). Typical measures included in TDM plans would also reduce GHG emissions; therefore, contributions to a TDM fund could also be considered a GHG-reduction measure.

Table 7. Estimated Operational Emissions of GHGs with Mitigation

Emissions Source	Annual Emissions (MT CO_2e)
Area	0
Energy	1,200
Mobile - Passenger Cars	4,103
Mobile - Trucks	2,883

Waste	1,225
Water	2,360
Stationary Source (Emergency Generator)	23
Amortized Construction	161
Total Project Emissions	**11,955**

Source: FirstCarbon 2020a

Greenhouse Gas Reduction Plans

The Scoping Plan contains a variety of strategies to reduce the State's emissions in accordance with AB 32 and SB 32. As shown in Table 8, the Project is consistent with most of the strategies, while others are not applicable to the Project. Therefore, theProject would be consistent with the Scoping Plan.

Table 8. Scoping Plan Consistency Analysis

Scoping Plan Reduction Measure	Project Consistency
AB 32 Scoping Plan	
1. California Cap-and-Trade Program Linked to Western Climate Initiative. Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	**Not applicable.** Although the cap-and-trade system has begun, the Project is not one targeted by the cap-and-trade system regulations and therefore this measure does not apply to the Project.
2. California Light-Duty Vehicle GHG Standards. Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not applicable.** This is a statewide measure that cannot be implemented by a project developer or lead agency. However, the standards would be applicable to the light-duty vehicles that access the Project site.
3. Energy Efficiency. Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent.** This is a measure for the State to increase its energy efficiency standards in new buildings. The Project is required to build to the new standards and would increase its energy efficiency through compliance.
4. Renewable Portfolio Standard. Achieve 33 percent renewable energy mix statewide. Renewable energy sources include (but are not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.	**Not applicable.** This is a statewide measure that cannot be implemented by a project developer or lead agency. Southern California Edison is required to increase its percent of power supply from renewable sources to 33 percent by the year 2020 pursuant to various regulations. The Project would purchase power from Southern California Edison that achieves at least this mix.

5. Low Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Not applicable.** This is a statewide measure that cannot be implemented by a project developer or lead agency. All fuel consumption associated with the Project's construction and operational activities would use fuel that meets these standards.
6. Regional Transportation-Related GHG targets. Develop regional GHG emissions reduction targets for passenger vehicles. This measure refers to SB 375.	**Not applicable.** The Project is not related to developing regional GHG emission reduction targets.
7. Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not directly applicable.** The standards would be applicable to the light-duty vehicles that would access the project site.
8. Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not applicable.** The project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
9. Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Consistent.** This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. The Project intends to provide roof-mounted solar equipment equivalent to offsetting 80 percent of the building's electrical usage.
10. Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not applicable.** This is a statewide measure that cannot be implemented by a project developer or lead agency.
11. Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can post-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive CH4 emissions and reduce flaring at refineries.	**Not applicable.** This measure would apply to the direct GHG emissions at major industrial facilities emitting more than 500,000 MT CO2e per year. The project would generate less than 500,000 MT CO2e per year.
12. High Speed Rail. Support implementation of a high-speed rail system.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project developer or lead agency. The Project would not preclude the implementation of this strategy.
13. Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent with mitigation.** The Project would comply with the California Energy Code and thus incorporate applicable energy efficiency features designed to reduce Project energy consumption. Specific Plan EIR MM J-3 and MM J-5 incorporate features designed to reduce the carbon footprint associated with the building and will be implemented as part of the Project.

14. High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Consistent.** This measure is applicable to the high global warming potential gases that would be used by sources with large equipment (such as in air conditioning and commercial refrigerators). It is not anticipated that the project would include refrigeration subject to refrigerant management regulations adopted by CARB. If the project were to install large air conditioning or refrigeration equipment subject to the refrigerant management regulations adopted by the CARB, the project would be required to comply with all CARB requirements for the Stationary Equipment Refrigerant Management Program.
15. Recycling and Waste. Reduce CH4 emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero waste.	**Consistent.** The project would not conflict with implementation of this measure. The project is required to achieve the recycling mandates via compliance with CALGreen. The project would utilize City of Oxnard recycling services.
16. Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not applicable.** The project site is in a built-up urban area. No forested lands exist on-site; therefore, no on-site preservation is possible.
17. Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** The project would comply with the California Energy Code and the California Updated Model Landscape Ordinance. With adherence to these regulations, the project will consume energy and water in an efficient manner. Implementation of Sakioka Farms Specific Plan EIR MM J-3 and MM J-5 will further reduce potential impacts.
18. Agriculture. In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020**.**	**Not applicable.** The project site is not designated or in use for agriculture purposes. No grazing, feedlot, or other agricultural activities that generate manure occur on-site or are proposed to be implemented by the project.
SB 32 Scoping Plan	
SB 350 50% Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33% in 2020 to 50% in 2030.	**Not directly applicable.** This measure would apply to utilities and not to individual development projects. The project would purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	**Not applicable.** This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.

Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	**Not directly applicable.** This is a statewide measure that cannot be implemented by a project developer or lead agency. However, vehicles accessing the fulfillment center would benefit from the standards.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million ZEVs on the road by 2030 and increasing numbers of ZEV trucks and buses.	**Not directly applicable.** This measure is not applicable to the Project; however, vehicles accessing the fulfillment center at the Project site would benefit from the increased availability of cleaner technology and fuels. Delivery trucks and buses that would serve the Project will be made by increasing numbers of ZEV delivery trucks**.**
Sustainable Freight Action Plan. The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	**Consistent.** This measure applies to owners and operators of trucks and freight operations. The Project is industrial in nature and would support truck and freight operations. PDF GHG-1 would require the construction of all buildings to facilitate sufficient electric charging for trucks to plug in, in anticipation of future technology that allows trucks to operate partially on electricity.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	**Consistent.** The project would not include major sources of black carbon.
SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.	**Not applicable.** The project does not include the development of a Regional Transportation Plan. Furthermore, the project is not within an SCS priority area.
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	**Not applicable.** The project is not one targeted by the Cap-and-Trade system regulations, and, therefore, this measure does not apply to the project.
Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, state, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	**Not Applicable.** The project is in a built-up urban area and would not be considered natural or working lands.

The City of Oxnard 2030 General Plan was adopted in October 2011 and includes amendments through December 2016. The 2030 General Plan includes implementing policies to reduce GHG emissions in the City of Oxnard, which are contained in the Sustainable Community Element. The City of Oxnard has

made other efforts to reduce GHG emissions in the region, but most of these efforts have resulted in discrete implementing policies that would apply to new development projects. The Project and future tenants and employees of the Project would benefit from infrastructure improvements made at the City level. As shown in Table 9, the Project is consistent with the applicable policies.

Table 9. 2030 General Plan Climate Change Consistency Analysis

General Plan Policy	Project Consistency
Implementing Policy SC-2.3 Sea Level Rise Consideration in Decision-Making: Ensure that all planning, public works, and related decisions take rising sea level into consideration and take steps to reduce risk of damage or loss of life and property.	**Not directly applicable.** This measure relates to planning decisions made at the regional- and local-level and would not apply to individual development projects that are consistent with the applicable general plan. The proposed industrial development project is consistent with the light industrial land use designation of the 2030 General Plan and the adopted land use designation of the Specific Plan.
Implementing Policy SC-3.7 Renewable Energy Production Requirement: As part of the City and Community EAP's, require that master planned commercial and industrial developments incorporate solar, wind, and other renewable energy generation and transmission equipment unless demonstrated to the satisfaction of a qualified renewable energy consultant to be infeasible.	**Consistent**. The project is consistent with the light industrial land use designation of the 2030 General Plan and the adopted land use designation of the Specific Plan. As discussed in the Initial Study/Consistency Analysis prepared for this project, the project would incorporate all applicable mitigation measures from the Specific Plan. Also, the project intends to provide roof-mounted solar equipment equivalent to offsetting 80 percent of the building's electrical usage.
Implementing Policy SC-3.12 Encourage Natural Ventilation: Review and revise applicable planning and building policies and regulations to promote use of natural ventilation in new construction and major additions or remodeling consistent with Oxnard's temperate climate.	**Consistent**. The project would comply with all applicable regulations imposed by the City of Oxnard.
Implementing Policy SC-4.1: Implement the 2010 California Green Building Code as may be amended and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.	**Consistent.** The project would meet or exceed the Green Building Code standards.

As presented above, the Project is consistent with the applicable Scoping Plan strategies and would not conflict with the recommendations of AB 32 and SB 32 in achieving a statewide reduction in GHG emissions. Furthermore, the Project would be consistent with applicable policies contained in the 2030 General Plan. In summary, the proposed plan would not conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of GHGs. Considering this information, the Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce the emissions of GHGs and impacts would be less than significant.

Specific Plan EIR Cumulative Impacts

The Specific Plan EIR determined that the Specific Plan will result in less than significant impacts related to GHG emissions with the implementation of mitigation. It did find significant and unavoidable impacts related to cumulative GHG emissions. Since the Project would contribute an incremental amount to the cumulative impact of Climate Change, it would result in significant and unavoidable impacts as determined in the Specific Plan EIR, even with implementation of mitigation measures, consistent with the Specific Plan EIR.

Impacts not Explicitly Analyzed in the Specific Plan EIR

In May 2017, the City adopted an updated CEQA Checklist to include threshold question three. Because the City's CEQA checklist was implemented after the adoption of the Specific Plan, impacts related to contributing to or being subject to potential secondary effects of climate change (e.g., sea level rise, increased fire hazard) were not explicitly discussed in the Specific Plan EIR. Analyzing the Project's contribution to or susceptibility to potential secondary effects of climate change is an adaptation of the recommended CEQA checklist questions and originates from the City of Oxnard CEQA Guidelines (City of Oxnard 2017). To determine significance, an evaluation was completed to determine if the Project would contribute or be subjected to the secondary effects of climate change expected to occur in California.

3) Would the Project contribute or be subject to potential secondary effects of climate change (e.g., sea level rise, increase fire hazard)?

The Project-specific impact associated with Project Bruin was analyzed in the Air Quality and GHG Analysis Report (FirstCarbon 2020a). Climate change may result in a number of secondary effects, including a reduction in the quality and supply of water from the Sierra snowpack, increased risk of large wildfires, reductions in the quality and quantity of certain agricultural products, exacerbation of air quality problems, increase in temperature and extreme weather events, and a decrease in the health and productivity of California's forests (California Climate Change Center 2006 and Moser et al. 2009).

An individual project, such as Project Bruin, cannot generate enough GHG emissions to effect a discernible change in global climate. However, the Project contributes to the potential for global climate change by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on global climate change. To determine significance, an evaluation was completed to determine if the Project would contribute or be subjected to the secondary effects of climate change expected to occur in California (see Table 10 below). As described in the evaluation, the project would not contribute or be subject to potential secondary effects of climate change. However, implementation of MM J-1 through MM J-6 would further reduce GHG emissions associated with the Project. Impacts would be less than significant with the implementation of mitigation.

Table 10. Secondary Effects of Climate Change

Consequences of Climate Change in California	Project Evaluation
Reduction in the quality and supply of water from the Sierra snowpack. If heat-trapping emissions continue unabated, more precipitation will fall as rain instead of snow, and the snow that does fall will melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. This can lead to challenges in securing adequate water supplies. It can also lead to a potential reduction in hydropower.	**The project would not contribute or be subject to this potential secondary effect of climate change.** Existing climate change models are designed for large-scale projects and are not precise enough to accurately predict changes on a watershed level. Therefore, it would be highly speculative to quantify the impacts of climate change on water supplies on a project-level basis. Development and operation of the project would result in the need for water service, however the General Plan has anticipated development of the project site and the demand of water service for typical industrial developments. The proposed industrial development is consistent with the light industrial land use designation of the 2030 General Plan and the adopted land use designation of the Sakioka Farms Business Park Specific Plan. As an e-commerce fulfillment center, the project would not place demands on water services above those planned for by the City of Oxnard.
Increased risk of large wildfires. If rain increases as temperatures rise, wildfires in the grasslands and chaparral ecosystems of southern California are estimated to increase by approximately 30 percent toward the end of the 21st century because more winter rain will stimulate the growth of more plant "fuel" available to burn in the fall. In contrast, a hotter, drier climate could promote up to 90 percent more northern California fires by the end of the century by drying out and increasing the flammability of forest vegetation.	**The project would not contribute or be subject to this potential secondary effect of climate change.** The project site is situated on an approximately 64.65-acre project site located within the 430-acre Sakioka Farms Business Park Specific Plan in Oxnard, California. The project site is in an urban area and is not in a forested area. The project's incremental contribution to climate change would not result in a discernible change in global climate that would increase the risk of wildfires. The project would not contribute to or be subject to an increased risk of large wildfires; related impacts would be less than significant.
Reductions in the quality and quantity of certain agricultural products. The crops and products likely to be adversely affected include wine grapes, fruit, nuts, and milk.	**The project would not contribute or be subject to this potential secondary effect of climate change.** This secondary effect relates to agricultural production. The Project is industrial in nature and would not engage in the production of agricultural products. Although the site would be converted from agricultural land for the future development of industrial uses, this is not due to the effects of climate change. Furthermore, the Project's incremental contribution to climate change would not have a measurable impact on the reduction of quality or quantity of agricultural commodities produced in California.
Exacerbation of air quality problems. If temperatures rise to the medium warming range, there could be 75 to 85 percent more days with weather conducive to ozone formation in Los	**The project would not contribute or be subject to this potential secondary effect of climate change.** Health effects from air quality problems that would be exacerbated by an

Angeles and the San Joaquin Valley, relative to today's conditions. This is more than twice the increase expected if rising temperatures remain in the lower warming range. This increase in air quality problems could result in an increase in asthma and other health-related problems.	increase in temperature would more commonly occur at a local level. As discussed in Section 4.3, the project would not expose sensitive receptors to substantial pollutant concentrations. Implementation of MM J-1 through MM J-6 would help reduce GHG emissions associated with the Project.
A rise in sea levels resulting in the displacement of coastal businesses and residences. During the past century, sea levels along California's coast have risen about seven inches. If emissions continue unabated and temperatures rise into the higher anticipated warming range, sea level is expected to rise an additional 22 to 35 inches by the end of the century. Elevations of this magnitude would inundate coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats.	**The project would not contribute or be subject to this potential secondary effect of climate change.** The project site is approximately 55 feet to 65 feet in elevation relative to local mean sea level. The project site is approximately 7.3 miles inland. The Project would not result in the displacement of coastal businesses and residences or be displaced due to a rise in sea levels.
Increased temperature and extreme weather events. Climate change is expected to lead to increases in the frequency, intensity, and duration of extreme heat events and heat waves in California. More heat waves can exacerbate chronic disease or heat-related illness.	**The project would not contribute or be subject to this potential secondary effect of climate change.** As previously discussed, the Project's incremental contribution of GHGs would not result in a discernible change in global climate. Development of the Project would not contribute to an increase in temperature or extreme weather events.
A decrease in the health and productivity of California's forests. Climate change can cause an increase in wildfires, an enhanced insect population, and establishment of non-native species.	**The project would not contribute or be subject to this potential secondary effect of climate change.** The project site is not forested and development of the site would not contribute to a change in the health and productivity of forested land. Development and operations of the Project would not result in an increase in wildfire, nor would it enhance insect populations or establish non-native species, resulting in a decrease in the health or productivity of California's forests.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

The Specific Plan, together with other pending urban development projects in the City which, even after application of the following mitigation measures, will result in a cumulative effect on GHG emissions and continuing Basin air quality nonattainment that is considered significant and unavoidable. Accordingly, a Statement of Overriding Considerations was prepared in accordance with CEQA and included within the resolution approving the Specific Plan. However, implementation of MM J-1 through MM J-6 would help reduce GHG emissions associated with this Project, and therefore, would apply:

MM J-1: This is an adaptive management mitigation measure. The Project developer shall implement fugitive dust control measures throughout all phases of construction. The Project developer shall include in construction contracts the control measures required and recommended by the Ventura County APCD

at the time of development. These measures, like all EIR mitigation measures, are binding on subsequent parties and developers. Examples of the types of measures currently required and recommended include the following:

- Minimize the area disturbed daily by clearing, grading, earthmoving, and/or excavation operations.
- Pre-grading/excavation activities shall include watering the area to be graded or excavated before the commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during these activities.
- All trucks shall be required to cover their loads as required by California Vehicle Code §23114.
- All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary.
- Material stockpiles shall be enclosed, covered, stabilized, or otherwise treated, to prevent blowing fugitive dust off site.
- Graded and/or excavated inactive areas of the construction site shall be monitored by a City-designated monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.
- Signs shall be posted on site limiting onsite traffic to 15 miles per hour or less.
- During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by onsite activities and operations from being a nuisance or hazard, either off site or on site. The site superintendent/supervisor shall use his/her discretion in conjunction with the Ventura County APCD is determining when winds are excessive.
- Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.
- Personnel involved in grading operations, including contractors and subcontractors should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

MM J-2: The Project developer shall implement measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the Project site throughout the Project construction phases. The Project developer shall include in construction contracts the control measures

required and recommended by the Ventura County APCD at the time of development. Examples of the types of measures currently required and recommended include the following:

- Maintain all construction equipment in good condition and in proper tune in accordance with manufacturer's specifications.
- Limit truck and equipment idling time to five minutes or less.
- Minimize the number of vehicles and equipment operating at the same time during the smog season (May through October).
- Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, to the extent feasible.

MM J-3: This is an adaptive management mitigation measure. The Project developer shall include in construction and building management contracts one or more of the following requirements or other measures shown to be equally effective:

- Use solar or low-emission water heaters in new buildings where feasible and as in common practice in similar new construction in the Oxnard area.
- Require that commercial landscapers providing services at the common areas of Project site use electric or battery-powered equipment, or other internal combustion equipment that is either certified by the California Air Resources Board or is three years old or less at the time of use, to the extent that such equipment is reasonably available and competitively priced in Ventura County (meaning that the equipment can be easily purchased at stores in Ventura County and the cost of the equipment is not more than 20 percent greater than the cost of standard equipment).
- Provide bus stop pull-out areas, and/or shelters at locations along and within the Project site. The number and location of bus stops shall be determined in consultation with Gold Coast Transit and the City Traffic Engineer. Cumulative air quality impact fees (see Mitigation J-6) paid by the Project developer or subsequent interests may be used for some or all of these structures or as credits against the fee and/or to be funded from the fee fund consistent with the City's practice with other projects with similar transit-oriented mitigation requirements.

MM J-4: This is an adaptive management mitigation measure. A Project-wide Transportation Demand Management (TDM) program shall be prepared by a qualified consultant for review by the Development Services Director within one year of the recordation of the first Final Tract Map and implemented on a phase by phase basis thereafter. The TDM program shall incorporate best and commonly used trip-reduction incentives, programs, and practices found in TDMs of similar projects in terms of allowed uses, size, and transportation and transit service context. The TDM shall, to the maximum extent financially feasible or practical, be coordinated and consistent with Gold Coast Transit service planning, development and/or final adoption of a regional and/or Oxnard Sustainable Communities Strategy (under SB 375), and TDMs or similar efforts of surrounding businesses and organized business and commercial organizations, including but not limited to, the Camino Real Business Park; Proctor and Gamble; Riverpark (The Collections); The Esplanade; The Village; Oxnard Auto Center Dealers Associations; and the McGinnes Ranch, Northgate, and Seagate business parks. The TDM shall include an

estimate of Project vehicular trips; a target reduction; a strategy and timeline to achieve the target; and one or more means of an independent sustainable funding program to administer, monitor, and routinely update the TDM program. At the discretion of the City Traffic Engineer based on applicable professional practice, documented and sustained TDM-attributable trip reductions shall be incorporated into future Project-related traffic studies and/or analyses for purposes of calculating traffic fees and/or modifying traffic-related mitigations. The TDM may be implemented on a phase-by-phase basis.

MM J-5: This is an adaptive management mitigation measure. The Specific Plan shall include a requirement that all structures with a flat or nearly flat roof area of over 10,000 square feet shall be designed with roof systems capable of supporting equipment that generates electricity from sunlight and/or wind if economically feasible and subject to review by the Fire Department. The roof systems may be designed to service the building and/or enter into a commercially reasonable public or private utility agreement for purposes of generating energy or transmission.

MM J-6: This is an adaptive management mitigation measure. The Project developer shall contribute to a cumulative impacts mitigation "buy-down" fund managed by the City based on the Ventura County Air Pollution Control District fee schedule effective at the time a building permit is issued. The fee contribution shall be assessed and paid incrementally as individual buildings are developed. The fee is allocated based on each development's share of ADT for the Project buildout. The ADT shall be recalculated annually by the City Traffic Engineer or upon request of the Project developer with a payment of a fee determined by the City Traffic Engineer that covers actual time and material costs to the City. The City shall consider transit and traffic demand management improvements and programs suggested by the Project developer, in excess of those otherwise required, as credits against the fee and/or to be funded from the fee fund.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusion

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Climate Change and GHG emissions not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the Project proponent, due to Project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Climate Change and GHG emissions are not required.

3.6 Cultural Resources & Tribal Cultural Resources

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because the Project would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Cause a substantial adverse change in the significance of an historical resource as defined in CEQA Guidelines Section 15064.5?	Less than significant	No	No
2) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines Section 15064.5?	Less than significant with mitigation	No	No
3) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant	No	No
4) Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant with mitigation	No	No

The Specific Plan EIR determined there are no known archeological or paleontological resources (now Cultural Resources and Tribal Cultural Resources) in the Specific Plan area. The EIR did find a limited possibility that archeological and/or paleontological resources still exist under the level of disturbed soils, and that these remains could be encountered during site preparation, generally below two feet deep. The EIR provided mitigation measures to lessen impacts to these resources if they are encountered.

Setting

In February 2006, a records search was conducted for the Specific Plan area by the South Central Coastal Information Center at California State University Fullerton. The records search included a review of all recorded archeological sites within a 0.5-mile radius of the Specific Plan area as well as a review of

cultural resource reports on file. The records search revealed one archaeological site within a 0.5-mile radius of the Specific Plan area, and one isolate located within the Specific Plan area. An isolated artifact is "an artifact that has been previously displaced from its original archaeological association, that is no longer part of an archaeological site, and that has little or no archaeological significance as an object in itself." The search also identified five additional cultural resources within a 0.5-mile radius of the Specific Plan area; however, none were identified within the Specific Plan area.

FirstCarbon Solutions prepared a project-specific Cultural Resources Assessment in March 2020 (First Carbon 2020b). The findings of that report are consistent with findings stated in the Specific Plan EIR. Therefore, the findings of the Cultural Resources Assessment are used herein to support this discussion and incorporated by reference.

Impact Discussion

1) Would the project cause a substantial adverse change in the significance of an historical resource as defined in State CEQA Guidelines Section 15064.5?

The Specific Plan area has been used for agricultural cultivation for several decades and the structures that existed at the site are relatively recent in origin and not considered of historical significance. No significant impacts are expected to occur with relation to historic resources. FirstCarbon Solutions assessed the effects of development for the proposed project site. No previously recorded prehistoric or historic resources are located on the project site and none were observed during the pedestrian survey FirstCarbon Solutions conducted on March 2, 2020. The proposed project would not cause a substantial adverse change in the significance of an historical resource as defined in State CEQA Guidelines Section 15064.5.

While unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered cultural resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, implementation of Specific Plan EIR MM A-1 is required to reduce potential impacts to historic resources to a less than significant level. Impacts would be less than significant with mitigation incorporated, which is consistent with the findings of the Specific Plan EIR.

2) Would the project cause a substantial adverse change in the significance of a unique archaeological resource pursuant to State CEQA Guidelines Section 15064.5?

A records search was conducted by FirstCarbon Solutions staff at the South Central Coastal Information Center (SCCIC) located at the California State University, Fullerton on February 26, 2020, to determine if known sites are recorded on the property. To identify additional historic properties or resources, the current inventories of the National Register of Historic Places, the California Register of Historical Resources, the California Historical Landmarks list, the California Points of Historical Interest list, and the California State Historic Resources Inventory were reviewed to determine the existence of previously documented local historical resources. The results of the records search indicated that no historic or prehistoric resources have been recorded within a 1-mile search radius of the Project site. In addition, 20

reports are on file with the SCCIC for the 0.5-mile search radius, two of which included a portion of the project area. These are identified in Table 2 of the Cultural Resources Assessment.

On March 2, 2020, FCS sent a letter to the Native American Heritage Commission (NAHC) in an effort to determine if any sacred sites are listed on its Sacred Lands File for the project site. On March 3, 2020, the NAHC responded that the search failed to indicate the presence of Native American cultural resources within the immediate project site. The NAHC provided a list of Native American tribal members who may have additional knowledge of the project site. First Carbon Solutions contacted each of the tribes by mail and invited them to provide any information they may have regarding cultural resources on the Project (First Carbon 2020b). Two FirstCarbon Solutions archaeologists surveyed the parcel on March 2, 2020. No historic or prehistoric sites were observed.

Given these factors, the likelihood of encountering undiscovered prehistoric archaeological resources over the course of project construction is considered moderate to low. However, there is a remote possibility that archeological resources still exist below the surface, and that these remains could be encountered during site improvements, generally below two feet in depth. The Specific Plan EIR requires periodic monitoring during construction, consistent with the City's standard conditions of approval to identify any previously unidentified archeological resources uncovered during project grading activity. Implementation of MM A-1 and MM A-2 would reduce impacts to a less than significant level, consistent with the findings of the Specific Plan EIR.

3) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

A project-related significant adverse effect could occur if grading or excavation activities associated with the project would disturb paleontological resources or geologic features. A search for paleontological resources was conducted through the Natural History Museum of Los Angeles County for the project site in March of 2006. On March 6, 2020, FirstCarbon Solutions requested the Los Angeles County Museum of Natural History conduct a records search to determine if any of the geologic formations underlying the project area held the potential to yield fossilized remains. Conclusions were consistent with the Specific Plan EIR (First Carbon 2020b).

The search determined there no vertebrate fossil localities are in the Specific Plan area, and no localities nearby are from the same or similar sedimentary units as those exposed in the Specific Plan area. The search also determined the surficial sediments at the Specific Plan area and in the surrounding area consist of younger terrestrial Quaternary Alluvium sediments of clay, which are unlikely to contain significant vertebrate fossils. Grading or shallow excavations are unlikely to uncover significant fossil vertebrate remains, but deeper excavations may encounter significant vertebrate fossils. The Specific Plan area, including the Project site, has been used for agricultural cultivation for many years, and it is likely that any surface paleontological remains have long since been eliminated by associated activities. There are no known paleontological resources in the Specific Plan area. Nevertheless, there is a remote possibility that unsuspected paleontological resources exist below the ground surface and could be encountered during construction. While no further evaluation of this issue was recommended in the EIR,

periodic monitoring during construction is required, consistent with standard City Conditions. This would ensure that project impacts would remain less than significant.

4) Would the project disturb any human remains, including those interred outside of formal cemeteries?

No human remains or cemeteries are known to exist in or near the Specific Plan area. However, there is always the possibility that subsurface construction activities associated with the Project site improvements, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. In the unlikely event human remains are discovered, implementation of Specific Plan EIR MM A-2 would reduce this potential impact to a less than significant level. These findings are consistent with the findings of the Specific Plan EIR, which found impacts to be less than significant with the implementation of mitigation.

Specific Plan EIR Cumulative Impacts

The Specific Plan EIR determined there was no evidence that the Specific Plan would cause significant environmental effects to Cultural Resources and therefore, no cumulative discussion was provided. The City certified the 2030 General Plan Program EIR which considered the possible environmental impacts of build-out to 2030, including the Specific Plan as approved. The 2030 General Plan Final Program EIR found significant and unavoidable impacts to the following resources: Air Quality and Greenhouse Gases; Agricultural Resources; Circulation, Traffic and Transportation; and Noise. All other environmental impacts were found to be less than significant with implementation of mitigating policies and programs. Development of the proposed Project does not change this finding.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

In order to reduce impacts to Cultural Resources & Tribal Cultural Resources to the extent feasible, the Specific Plan EIR imposed a number of mitigation measures. The following mitigation measure apply to this Project:

MM A-1: This is an adaptive management mitigation measure. The Project developer and/or subsequent responsible parties shall contract with a qualified archaeologist to monitor initial grading and excavation more than three feet. If any historic or prehistoric cultural resources are discovered, they will be evaluated in accordance with the procedures set forth in CEQA Section 15064.5. If the evaluation determines that such resources are either unique or significant archaeological, paleontological, or historic resources and that the Project would result in significant effects on those resources, then further mitigation would be required. In cases where the resources are unique, then avoidance, capping, or other measures, including data recovery, would be appropriate mitigation. If the resources are not unique, then recovery, without further mitigation, would be appropriate.

MM A-2: This is an adaptive management mitigation measure. The Project developer and/or subsequent responsible parties shall contract with a Native American monitor to be present during all subsurface

grading, trenching, or construction activities more than three feet on the Project site. The monitor shall provide a monthly report to the Planning Division summarizing the activities during the reporting period. If any qualifying cultural materials are encountered during this phase of project construction, construction activities on the project site shall be halted immediately, and the Project developer shall notify the City. If any find were determined to be significant by the Native American monitor, the City and the Native American monitor would meet to determine the appropriate course of action. A copy of the contract for these services shall be submitted to the Planning Division Manager for review and approval prior to issuance of any grading permits. A final monitoring report(s) shall be provided to the Planning Division prior to approval of final building certificate(s) of occupancy signature.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Cultural Resources and Tribal Cultural Resources not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Cultural Resources and Tribal Cultural Resources, including paleontological resources, are not required.

3.7 Geology & Soils

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because the Project would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist or based on other substantial evidence of a known fault?	Less than significant with mitigation	No	No
1b) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic groundshaking that cannot be addressed through compliance with standard Code requirements?	Less than significant with mitigation	No	No
2) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse that cannot be addressed through compliance with standard Code Requirements?	No impact	No	No

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because the Project would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
3) Be located on expansive soil, creating substantial risks to life or property that cannot be addressed through compliance with standard Code requirements?	Less than significant with mitigation	No	No
4) Expose people or structures to inundation by seiche or tsunami?	Less than significant	No	No
5) Rely on dredging or other maintenance activity by another agency that is not guaranteed to continue?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	

The potential Geology and Soils impacts associated with the proposed Specific Plan were determined to be less than significant with mitigation in the Specific Plan EIR. Implementation of required building codes, project-specific geotechnical engineering considerations, and recommended mitigation measures would reduce the potential impact to that consistent with other well-designed structures in southern California.

Setting

The Specific Plan area is situated in the eastern Transverse Range Geomorphic Province in southern California. Geologic structures in the western Transverse Ranges region were formed by folding and displacement on thrust and reverse faults accommodating the regional compressional strain from the convergence of the North American and Pacific plates along a northwest-trending segment of San Andreas Fault. This resulted in uplift, mountain formation, basin formation, and seismicity throughout the region. The Ventura Basin is a 120-mile long, deep structural trough filled with more than 58,000 feet of primarily marine sedimentary rocks during the Cretaceous through Pleistocene periods. The folding and faulting of the thick sequence of sediments in the Ventura Basin created numerous oil and gas fields throughout the region.

In the Ventura Basin, the Oxnard Plain is a broad, low-lying coastal plain bounded by the Pacific Ocean to the west, the Camarillo Hills to the east, the Santa Monica Mountains to the south, and the San Ynez, Topa Topa, and Los Padres mountains to the north. The Oxnard Plain is characterized by relatively flat topography that slopes gently seaward from alluvial fans at the base of the surrounding mountains. The Specific Plan area is mapped as being underlain in its entirety by Holocene alluvial deposits consisting of unconsolidated, poorly sorted sandy clay and clayey sand with local gravel.

The Specific Plan EIR cited a nearby geologic feasibility study prepared by GeoSoils Consultants, Inc. and dated June 21, 2005 for subsurface geotechnical information (City of Oxnard 2011b). Borings conducted for the GeoSoils study, ranging in depth from 30 to 50 feet, indicate alluvial subsurface materials consisting of interbedded clayey silt and silty clay in the upper 20 feet transitioning to fine sand and silty sand to the maximum depth drilled. These materials ranged from moderately dense or firm near the surface to dense or stiff with depth.

Terracon Consultants prepared a project-specific Geotechnical Engineering Report in March 2020 (Terracon 2020). The report presents the results of the subsurface exploration and provides geotechnical recommendations concerning earthwork and the design and construction of foundations, floor slab, pavements, and infiltration systems for the proposed project. Six new test borings were conducted by Terracon, in addition to 37 borings and six cone penetrometer test soundings that were previously conducted by Terracon in the same area in 2018. All the borings and the cone penetrometer tests were to depths ranging between 5 and 58 feet below existing site grades. The findings of that report are consistent with findings stated in the Specific Plan EIR. The Geotechnical Engineering Report is used herein to support this discussion and incorporated by reference.

Impact Discussion

1a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist or based on other substantial evidence of a known fault?

According to the Specific Plan EIR, the Specific Plan Area is not crossed by any Alquist-Priolo zoned faults; however, the projected traces of two segments, the Springville and Camarillo segments, of the east-west trending Simi-Santa Rosa fault cross the southern portion of the area as shown in Figure IV.F-2 of the SP EIR. These segments of the Simi-Santa Rosa fault are Alquist-Priolo zoned where they have been mapped on the surface approximately 1.4 and 3.4 miles to the north and northeast of the project site, respectively. The potential presence of these fault segments through the southern portion of the Project site results in a potentially significant impact.

MM F-1 of the Specific Plan EIR requires detailed design-level geotechnical investigations to be performed by qualified licensed professionals for each individual proposed project/phase of the Specific Plan. In addition, proper design following industry standards, State, and City building codes for Seismic Zone 4 would reduce potential impacts related to strong seismic ground shaking to a less than significant

level. The design-level investigations for the proposed project are included in the Geotechnical Engineering Report (Terracon 2020), which includes recommendations for design and construction. Implementation of such recommendations would reduce impacts to a less than significant level. Impacts resulting from the proposed project would be consistent with the findings of the Specific Plan EIR, which were found to be less than significant with mitigation incorporated.

1b) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic groundshaking that cannot be addressed through compliance with standard Code requirements?

The Specific Plan area is located in the seismically active southern California region and will likely be subject to strong ground shaking associated with earthquakes on the San Andreas and Transverse Ranges fault systems; however, according to the Terracon report, the Specific Plan area is not in an Alquist-Priolo Earthquake Fault Zone based on a review of State Fault Hazard maps. Since periodic earthquakes accompanied by surface displacement can be expected in the Specific Plan area through the lifetime of the Specific Plan, the effects of strong groundshaking and fault rupture are of primary concern to the safety of project facilities and to the people who may occupy businesses and residences that are part of the Specific Plan area.

The Specific Plan EIR found that the 430-acre business park site could address strong seismic groundshaking through compliance with standard code requirements which would reduce substantial risks to life or property to less than significant. The proposed Project would be compliant with all code requirements and would utilize the project-specific geotechnical engineering guidance. Impacts would be less than significant, which are consistent with the findings of the Specific Plan EIR.

2) Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse that cannot be addressed through compliance with standard Code requirements?

The response to this question is incorporated in the response to the next question.

3) Would the project be located on expansive soil, creating substantial risks to life or property that cannot be addressed through compliance with standard Code requirements?

The Specific Plan EIR found that the 430-acre business park site was not located on soil that is unstable or that would become unstable as a result of the project and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse that cannot be addressed through compliance with standard code requirements and therefore there would be no impact. According to a search conducted through the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), the site consists of Camarillo sandy loam, Camarillo loam, and Pacheco silty clay loam (USDA 2020). While the project specific Geotechnical Engineering Report determined that the project site is subject to liquefaction, implementation of the recommendations within the report would reduce impacts to a less than significant level. The Specific Plan EIR indicates that Camarillo soils have low expansion potential, and Pacheco soils have moderate expansion potential. The Sakioka Farms

Business Park Specific Plan EIR determined that impacts would be less than significant for the 430-acre Sakioka Farms Specific Plan area as the site is not located on expansive soil, creating substantial risks to life or property that cannot be addressed through compliance with standard code requirements. In addition, the Specific Plan EIR determined that compliance with City and State building codes would minimize project-specific potential impacts resulting from expansive soil. No mitigation was proposed.

According to the Specific Plan EIR, the Specific Plan Area is located in an area mapped as potentially liquefiable on CGS Seismic Hazard Maps. In the event of strong groundshaking, liquefaction could occur, resulting in damage to business park structures. However, the Specific Plan EIR found that proper design following industry standards, including required detailed geotechnical surveys for proposed development and City and State Building codes for Seismic Zone 4, would reduce the potential impact related to exposing people or structures to hazards related to liquefaction to a less than significant level. The findings of the project-specific Geotechnical Engineering Report anticipated seismic induced settlement, liquefaction potential, and presence of relatively high compressibility of clay soils and provides geotechnical engineering guidance for development of the site. The proposed Project would be compliant with all code requirements and would utilize the project-specific geotechnical engineering guidance. Impacts would be less than significant, which are consistent with the findings of the Specific Plan EIR.

4) Would the project expose people or structures to inundation by seiche or tsunami?

The Specific Plan area is located approximately six miles from the coast and is not located near a body of water. Therefore, the Specific Plan EIR found the potential for the Specific Plan area to be affected by a seiche or tsunami is remote, and impacts are less than significant. The development of the proposed e-commerce fulfillment center does not change these conditions.

Specific Plan EIR Cumulative Impacts

Geotechnical hazards are generally site-specific and there is little, if any, cumulative relationship between development of the Specific Plan and related projects. As such, the Specific Plan EIR found that build-out of the Specific Plan, along with related projects, was not anticipated to cumulatively expose people or structures to such geologic hazards as landslides and/or unstable soils, or to increase the potential for soil erosion or the loss of topsoil. Any site-specific issues would be addressed on a project-specific basis in line with the recommendations outlined in the Specific Plan EIR Geology and Soils section. Therefore, any potential cumulative geological impacts would be reduced to less than significant levels. The development of the proposed e-commerce fulfillment center does not change this finding.

Impacts not Explicitly Analyzed in the Specific Plan EIR

In May 2017, the City adopted an updated CEQA Checklist to include threshold question five. Because the City's CEQA checklist was implemented after the adoption of the Specific Plan, impacts related to

dredging or other maintenance activity by another agency on the project site were not explicitly discussed in the Specific Plan EIR.

5) Would the project rely on dredging or other maintenance activity by another agency that is not guaranteed to continue?

The Specific Plan area is located approximately six miles from the coast and has historically been used for agriculture. The Specific Plan area does not require dredging or other maintenance activity by another agency. There would be no impact.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

In order to reduce impacts to Geology and Soils to the extent feasible, the Specific Plan EIR imposed a number of mitigation measures. The following mitigation measure would apply to this Project:

Construction Impacts

Impacts associated with Geology and Soils during construction of the Specific Plan area were determined to be less than significant and no mitigation measures are required.

Operational Impacts

The following mitigation measure is required to reduce the potential impacts to project structures and facilities and the public from seismic events occurring on the regional southern California faults.

MM F-1: This is an adaptive management mitigation measure. *Conduct Geotechnical Investigations and Adhere to Recommendations:* Detailed design-level geotechnical investigations shall be performed by qualified licensed professionals for each project proposed during various phases of Specific Plan implementation. These geotechnical investigations shall include, but not be limited to:

- Identification of unsuitable soils including expansive, corrosive, and collapsible soils
- Identification of presence and extent of liquefiable soils
- Calculation of site-specific seismic design criteria
- A fault evaluation study to confirm the presence or absence of the Springville and Camarillo segments of the Simi-Santa Rosa fault across the southern half of the Specific Plan site

Recommendations shall be provided in these reports for design of project structures and facilities and for mitigation of any unsuitable conditions encountered. These reports shall be provided to the City and other reviewing agencies for review. These recommendations shall be implemented, as deemed appropriate by the City and the Applicant's engineering design consultant.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Geology and Soils not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Geology and Soils are not required.

3.8 Hazards & Hazardous Materials

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials that cannot be addressed through compliance with standard regulatory requirements?	Less than significant with mitigation	No	No
2) Create a substantial hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment?	Less than significant with mitigation	No	No
3) Emit hazardous substances or involve handling hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school, in quantities or a manner that would create a substantial hazard?	No impact	No	No
4) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a substantial hazard to the public or environment?	Less than significant with mitigation	No	No
5) Impair implementation of or physically interfere with an adopted emergency plan or emergency evacuation?	This impact was not analyzed in the Specific Plan	No new or substantially more severe significant impacts and no new mitigation measures are required	No

	EIR		

The Hazards and Hazardous Materials section of the Specific Plan EIR was based largely on the Phase I Environmental Site Assessment, *Report of Phase I Environmental Site Assessment, Sakioka Farms 427-acre Agricultural Site (APNs 216-0-030-065, 075, 085, and 105) City of Oxnard, County of Ventura, State of California*, which is Appendix F to the Specific Plan Draft EIR and is available for review at the County Development Department. The Specific Plan EIR requires project-level analysis for potential hazards and hazardous materials impacts from future development in the Specific Plan area. The project-level analysis for the proposed e-commerce fulfillment center did not identify any new or more severe significant impacts as compared to those outlined in the Specific Plan EIR, and implementation of the mitigation measures set forth in the Specific Plan EIR would reduce all impacts to a less than significant level.

Setting

The Specific Plan area encompasses approximately 430 acres of farmland south of US 101, east of Rice Avenue, west of Del Norte Boulevard, and north of the Procter and Gamble site. The site has historically been used as farmland, and at the time the Specific Plan was adopted, it was vacant except for scattered farm-related structures (garages, sheds, trailers, etc.) clustered around the site. In 2002, RBF reviewed available historical aerial photographs dated 1938 through 1994 for the Specific Plan area and those immediately adjacent to assist in the identification of development activities that have historically occurred on site. Agricultural uses on the Specific Plan area date back to 1938.

Asbestos-containing materials are building materials containing more than one percent asbestos. If inhaled, asbestos fibers can result in serious health problems. Although some structures are located within the boundaries of the Specific Plan area, the structures are of wood frame construction with no insulation, tile flooring, or friable materials. Therefore, the potential for asbestos-containing materials to be found on site is unlikely.

It is estimated that over 80 percent of housing built before 1978 contains some lead-based paint. In poor conditions lead-based paints can create a potential health hazard for building occupants. Based upon the year the existing structures present on the Specific Plan area were built, there exists potential for lead-based paints to be found on site.

The Specific Plan EIR included mitigation for potential hazards and hazardous materials impacts from future development in the Plan Area by requiring project-level analysis to be conducted. Accordingly, a project-specific Phase I Environmental Site Assessment (Phase I ESA), was prepared for the project by Geosyntec Consultants on June 11, 2020. Additionally, Phase II ESAs were prepared by Hazard Management Consulting on June 25, 2018 and Geosyntec on May 27, 2020. These documents are used herein to support this discussion and incorporated by reference.

Impact Discussion

1) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials that cannot be addressed through compliance with standard regulatory requirements?

The response to this question is incorporated within the response to the next question.

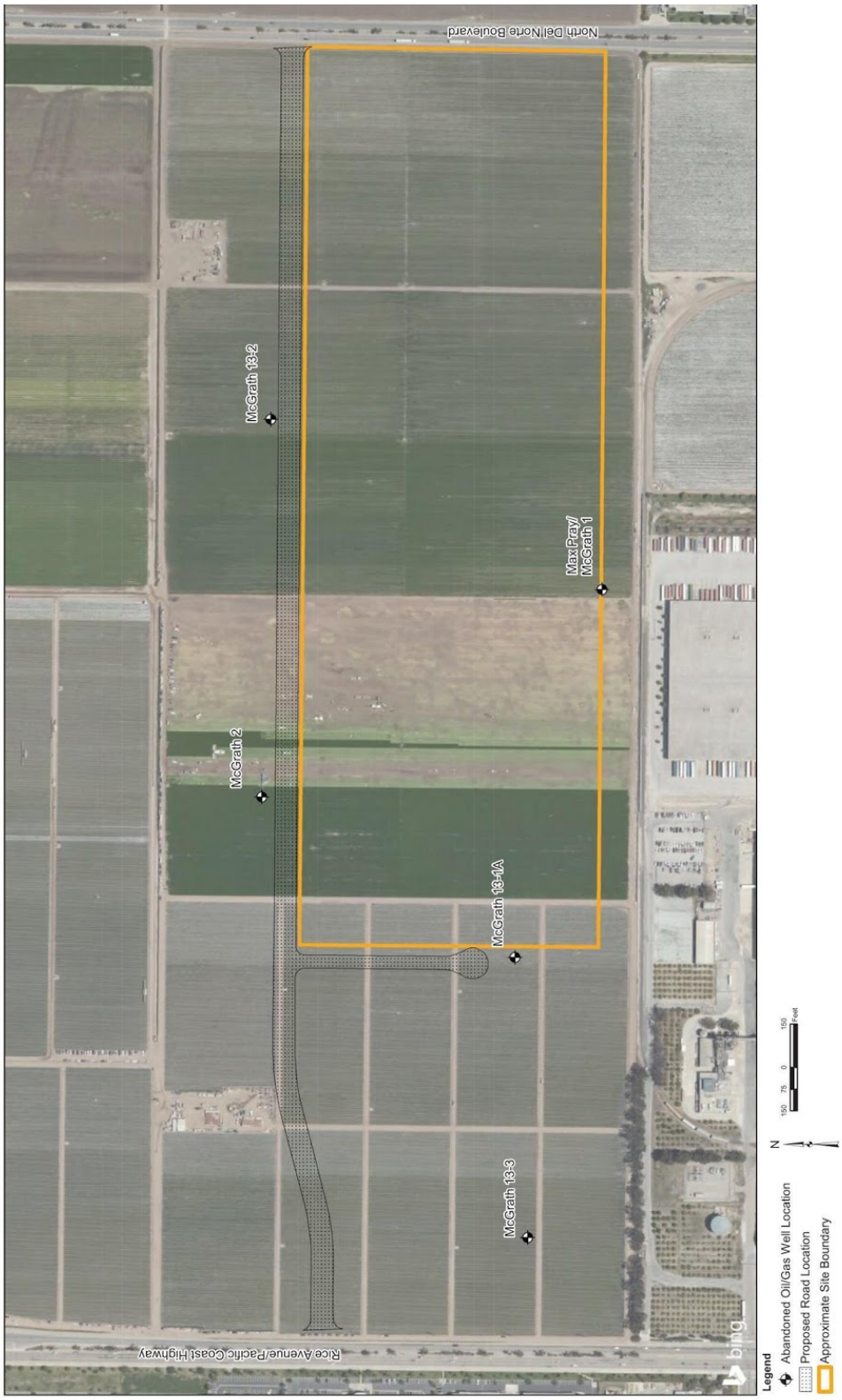
2) Would the project create a substantial hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment?

During construction demolition activities, accidental release or upset of the contents of many of the storage containers described in the Specific Plan EIR would cause a significant impact. All miscellaneous vehicles, maintenance equipment and materials, construction/irrigation materials, miscellaneous stockpiled debris, dumpsters, pesticide application equipment, aboveground storage tanks, 55-gallon drums, and 5-gallon buckets would be removed offsite and properly disposed as described in MM G-1. Visual inspection of all storage structures would be performed, and if hazardous materials were encountered, they would be tested and properly disposed of pursuant to State and federal regulations and as required by MM G-2.

While numerous areas throughout the Specific Plan area have evidence of surficial staining, most of this staining is found on concrete, and thus potential for subsurface staining is reduced. According to the Specific Plan EIR, surficial soil staining appears to be minor and associated with regular maintenance of farm equipment, and therefore is not considered a recognized environmental concern. However, due to visible evidence of dark surface soil staining from oil/petroleum products in Planning Area 5, any soil impacted by the site improvements would be excavated to determine the exact vertical extent of the contamination. If during soil removal, staining appears to continue below the ground surface, sampling would be performed to identify the extent of contamination and appropriate remedial measures, as required by MM G-3. The proposed Project would be in Area 5 of the Specific Plan area. The Phase I ESA findings for this Planning Area are as follows:

The project-specific Phase I ESA identified de minimus conditions related to historical and current agricultural use on the project site. Fourteen shallow soil samples (eight in 2018 and six in 2020) were collected and analyzed for organochlorine pesticides. Detections were below the USEPA and Department of Toxic Substances Control (DTSC) screening levels for commercial/industrial land use. Additionally, the report indicated that the region has a history of known oil and gas exploration and production, and two former oil wells appeared present on the project site and three former oil and gas wells are located in close proximity to the project site (Figure 13). Since the Phase I ESA was prepared, the project boundaries have been further refined, and the two former oil wells which were identified on the project site are now located slightly outside the project boundaries (to the south and to the west).

Figure 13. Location of Oil & Gas Wells



In 2018, a subsurface investigation was conducted to evaluate potential impacts from the onsite and nearby oil and gas wells. The investigation consisted of soil sampling, and the samples were analyzed for metals. Total petroleum hydrocarbons and volatile organic compounds were not detected, and arsenic was below the regional background maximum of 12 milligrams per kilogram. Other select metals were below their respective USEPA or DTSC screening levels and regional maximum background concentrations. In 2020, an additional subsurface investigation was conducted to confirm the locations of the oil and gas wells and further evaluate potential impacts from the wells.

The investigation confirmed that two wells are located on the project site, but are not located beneath the proposed building footprint. Since the May 2020 investigation was conducted, the project boundaries have been further refined, and the two former oil wells which were identified on the project site have been determined to be located slightly outside the project boundaries (to the south and to the west). Soil sample detections for total petroleum hydrocarbons, volatile organic compounds, and metals were below DTSC screening levels for commercial/industrial land use. The soil vapor sampling results indicate that concentrations of select volatile organic compounds exceed default DTSC screening levels, however, when the screening levels are modified to account for the vapor attenuation that a new building foundation would provide, the concentrations of volatile organic compounds are below the modified screening levels. The 2020 Phase II ESA recommends the preparation of a Soil Management Plan that describes proper soil management procedures to be followed during development activities. In addition, the 2020 report notes that per CalGEM best practices and conversations with CalGEM, no structures or paved surfaces should be constructed over the oil and gas wells; sufficient access should be maintained around each well location in the event that well maintenance is required in the future; and CalGEM should perform a construction review once detailed site plans are available.

The proposed Project would comply with the requirements and recommendations of the Phase I and Phase II ESAs and all applicable regulatory codes, and the Project would implement MM G-1, G-2, and G-3 from the Specific Plan EIR. With the implementation of mitigation, impacts resulting from the proposed Project would be less than significant. These findings are consistent with the findings of the Specific Plan EIR, which found impacts to be less than significant with mitigation incorporated.

4) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a substantial hazard to the public or environment?

According to the DTSC Envirostor website, there are no hazardous materials sites on or near the project site. However, there is one leaking underground storage tank (LUST) cleanup site that has been closed as of 2002 at 527 Rice Avenue, approximately 0.32 mile southwest of the project site (DTSC 2020). The project-specific Phase I ESA did not identify any significant impacts related to a LUST near the project site. The Specific Plan EIR found that this impact would be less than significant with the implementation of MM G-3 through MM G-7.

In addition, due to the volume of vehicles traveling on US 101 the last 50 years or so, potential exists for lead contamination to be present in exposed soils on the northern boundary of the Specific Plan area

that could be released into the air during construction activities. Areas of exposed soil 5 feet from the California Department of Transportation right-of-way along US 101 that will be disturbed during any excavation/grading activities would be sampled and tested for lead, and appropriate remediation measures if needed, would be recommended, as required by MM G-4. The proposed Project would not impact Planning Areas 1 or 7, which are those adjacent to US 101. Therefore, MM G-4 would not apply to this Project.

Since the Specific Plan area has been used for agricultural purposes for several decades, several pesticides that are now banned may have been used throughout the site. While there is no requirement that agricultural soil be tested prior to development, the historical use of agricultural pesticides on the site may have resulted in residue of certain, persistent in-soil concentrations that may present a hazard to human health and/or the environment according to established State and federal regulatory levels. Therefore, the recommendation in the Specific Plan EIR was for soil sampling to occur throughout the Specific Plan area. The sampling would determine if pesticide concentrations exceed established regulatory requirements and would identify proper handling procedures that may be required as described in MM G-5.

The proposed Project would implement MM G-3, MM G-5, and MM G-6 and impacts associated with the 64.65-acre project site would be consistent with the findings of the Specific Plan EIR, which were determined to be less than significant with the implementation of mitigation.

Specific Plan EIR Cumulative Impacts

Development of the Specific Plan in combination with the related projects has the potential to increase the use, storage, transport, and/or accidental release of hazardous materials during construction and operation. However, impacts with respect to hazards and hazardous materials are generally site specific. With respect to related projects, each project would require evaluation for potential threats to public safety, including those associated with routine transport, use, or disposal of hazardous materials; upset and accident conditions involving the release of hazardous materials into the environment; hazardous emissions in proximity to an existing or proposed school; hazardous materials site listing; and interference with an adopted emergency response or evacuation plan. Because hazardous materials and risk of upset conditions are largely site-specific, this would occur for each individual project affected, in conjunction with the development proposals on these properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials and other hazards. Therefore, with compliance with local, state, and federal laws pertaining to Hazards and Hazardous Materials, cumulative impacts would be less than significant. The proposed Project does not change this finding.

Impacts not Explicitly Analyzed in the Specific Plan EIR

The Specific Plan EIR did not specifically evaluate whether the project would emit hazardous substances or involve handling hazardous or acutely hazardous substances or waste within 0.25 mile of an existing or proposed school, in quantities or a manner that would create a substantial hazard (question three). In

May 2017, the City adopted an updated CEQA Checklist to include threshold question five. Because the City's CEQA Consistency Evaluation was implemented after the adoption of the Specific Plan, impacts related to impairing implementation of or physically interfering with an adopted emergency plan or emergency evacuation (question five) were not explicitly discussed in the Specific Plan EIR. The Specific Plan did state each project would be required to evaluate for potential interference with an adopted emergency response or evacuation plan.

3) Would the project emit hazardous substances or involve handling hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school, in quantities or a manner that would create a substantial hazard?

The Specific Plan EIR did not specifically evaluate whether potentially hazardous materials could be used or stored near schools during the short-term construction of projects in the Plan Area, or during the long-term operation of commercial, institutional or industrial businesses, or residences. The Specific Plan EIR states that all subsequent development is subject to various federal, State, and local reviews and regulations related to hazardous wastes. The ITT Technical Institute Oxnard Campus is located approximately 0.44 mile northwest of the project site at 2051 Solar Drive No. 150. Rio Rosales Elementary School is at 1001 Kohala Street, Oxnard, CA, approximately 0.63 mile from the project site. The proposed project would not emit hazardous substances or involve the handling of hazardous or acutely hazardous substances within 0.25 mile of a school in quantities that would create a substantial hazard. There would be no impact. Therefore, there would not be new or more severe impacts compared to the impacts analyzed in the Specific Plan EIR.

5) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Specific Plan EIR did not specifically evaluate whether development on-site would impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project would not involve any other activities during its operational phase that could impede public access or travel upon public rights-of-way or would interfere with an emergency response or evacuation plan. No additional impact would result from project implementation.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

In order to reduce impacts to Hazards and Hazardous Materials to the extent feasible, the Specific Plan EIR imposed a number of mitigation measures. The following mitigation measure would apply to this Project:

MM G-1: All miscellaneous vehicles, maintenance equipment and materials, construction/irrigation materials, miscellaneous stockpiled debris, dumpsters, pesticide application equipment, ASTs, 55-gallon drums, and 5-gallon buckets should be removed and properly disposed off site consistent with the phased development described in the Specific Plan. Once removed, a visual inspection of the areas beneath the removed materials should be performed. Any stained soils observed underneath the

removed materials should be sampled. Results of the sampling would indicate the level of remediation efforts that may be required.

MM G-2: A visual inspection of all storage structures shall be performed prior to demolition activities. In the event that hazardous materials are encountered, the materials shall be tested and properly disposed of pursuant to local, State and federal regulations.

MM G-3: Due to visible evidence of dark surface soil staining of oil/petroleum products located within Area 5, soil shall be excavated to determine the exact vertical extent of the contamination. If during soil removal, staining appears to continue below the ground surface, sampling shall be performed to identify the extent of contamination and appropriate remedial measures shall be taken.

MM G-5: *This is an adaptive management mitigation measure.* Soil sampling shall occur throughout the Project site concurrent with phased development, including the pesticide mixing areas within Areas 1 and 3. The sampling will determine if pesticide concentrations exceed established regulatory requirements and will identify proper handling procedures that may be required.

MM G-6: Padre Associates findings regarding residual soil contamination associated with the historical operation of oil/gas extraction wells should be reviewed and appropriate remedial recommendations (if any) should be administered. In addition to recommendations provided by Padre Associates, the CalGEM well abandonment procedures shall be followed and formal verification of closure be sent to CalGEM[2].

MM G-8: *This is an adaptive management mitigation measure.* Consistent with the Airport Comprehensive Land Use Plan for Ventura County and the Specific Plan, commercial/industrial development is permitted within the Extended Traffic Pattern Zone subject to aviation easements and appropriate recorded disclosures.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

The following Specific Plan EIR mitigation measure reduces the impact associated with the impacts to Hazards and Hazardous Materials; however, these mitigation measures do not apply to this individual Project:

MM G-4: Areas of exposed soil five feet from the expanded California Department of Transportation right-of-way along US 101 after completion of the Rice Avenue/US 101 interchange reconstruction, which will be disturbed during any excavation/grading activities, shall be sampled and tested for lead. In the unlikely event that unacceptable levels of lead materials are encountered, the materials shall be disposed of pursuant to State and federal regulations.

MM G-7: A qualified lead-paint abatement consultant shall be employed to comply with applicable state and federal rules and regulations governing lead paint abatement if any remaining structures are suspected of containing lead-based paint.

[2] CalGEM was formerly the California Department of Oil, Gas, and Geothermal Resources (DOGGR).

Conclusion

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Hazards and Hazardous Materials not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Hazards and Hazardous Materials are not required.

3.9 Hydrology & Water Quality

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Cause any violation of any adopted water quality standards or waste discharge or treatment requirements?	Less than significant	No	No
2) Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g, the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	Less than significant	No	No
3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in onsite or offsite flooding or exceed the capacity of existing or planned stormwater drainage systems?	Less than significant	No	No
4) Place new structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Less than significant	No	No
5) Impede or redirect flood flows such that it would increase onsite	Less than significant	No	No

or offsite flood potential?			
6) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a dam or levee?	Less than significant	No	No
7) Be exposed to a substantial risk related to inundation by seiche, tsunami, or mudflow?	Less than significant	No	No

The analysis of Hydrology and Water Quality in the Specific Plan EIR was based on the report Conceptual Hydrology Drainage Study Report for Sakioka Farms, Between Rice Avenue, Del Norte Avenue, and the US 101 Freeway, Oxnard, California (RBF Consulting 2008). The Specific Plan EIR determined that implementation of Specific Plan projects would not result in any significant project-level or cumulative impacts related to Hydrology and Water Quality, and no mitigation measures were required.

Setting

Regionally, the Specific Plan area is located in the Santa Clara-Calleguas hydrological unit, one of the two major hydrological units in Ventura County. Oxnard lies almost entirely within the Oxnard Plain Basin and Oxnard Forebay Basin, with small portions in the Mound Basin south of the Santa Clara River and in the North La Posas Basin in the northeast. The Oxnard Plain Basin has approximately 7,800,000 acre-feet of groundwater storage capacity and is mostly confined (covered by an impermeable clay layer). The confined nature of the basin means that rain water or surface water cannot penetrate the surface of the ground and replenish or recharge the underlying basin. Soil on top of the clay layer will absorb rain and runoff to some extent, depending on its makeup and depth. Recharge must take place at the margins of the basin, where the clay cap is absent.

The Specific Plan area is relatively flat, and drains generally from the northwest to the southeast at a slope of approximately 0.25 percent. Drainage is collected by two unlined earthen channels that traverse the site from west to east. These channels join an unlined earthen channel that runs through the site from north to south. This channel conveys the existing flows from the site as well as existing offsite flow to an existing concrete lined trapezoidal channel (Sturgis Road Drain) near the southeast corner of the Specific Plan area.

The following project-level impact analysis is based on the findings of the following project-specific reports, all prepared by Kimley-Horn and Associates, Inc. in March 2020. These documents are used herein to support this discussion and incorporated by reference.

- Hydrologic and Hydraulic Drainage Report (Drainage Report) for Project Bruin
- Preliminary Engineering Water Study
- Stormwater Quality Management Plan

Impact Discussion

Since the proposed Project would include grading of more than one acre, the Project would require a General Construction Activity Stormwater Permit (General Permit) from the State Water Resources Control Board prior to the start of construction. The National Pollutant Discharge Elimination System (NPDES) requires that a Notice of Intent be filed with the State Water Resources Control Board. By filing a Notice of Intent, the project developer agrees to the conditions outlined in the General Permit. One of the conditions of the General Permit is the development and the implementation of a Stormwater Pollution Prevention Permit, which identifies what structural and nonstructural best management practices (BMP) will be implemented, such as sandbag barriers, temporary desilting basins near inlets, gravel driveways, dust controls, employee training, and general good housekeeping practices. With implementation of the applicable grading and building permit requirements and the application of BMPs specifically designed to minimize construction-related water quality impacts, the construction of the proposed project would not violate any water quality standards or waste discharge requirements. Therefore, construction-related impacts would be less than significant.

1) Would the project cause a violation of any adopted water quality standards or waste discharge or treatment requirements?

The City of Oxnard requires all new development in the city to incorporate stormwater quality control measures into the proposed improvement plans as part of the Ventura Countywide Stormwater Quality Urban Impact Mitigation Management Plan (SQUIMP), NPDES Permit No. CAS004002, Order 2010-0108 for projects deemed complete prior to October 11, 2011. The Sakioka Farm Specific Plan is "grandfathered" under the old permit because the project application was completed prior to the 2011 rule update. BMP devices for the proposed Project site improvements would be designed per the Ventura County Technical Guidance Manual (TGM), July 2002 (Ventura County 2002). The Stormwater Quality Design Flow is defined as 10 percent of the 50 year storm event, and the Stormwater Quality Design Volume is defined as the volume necessary to capture and treat 80 percent or more of the average annual runoff volume from the site at the design drawdown period.

The overall design concept was established to allow water to be treated through treatment train methods. The "treatment train" allows for improved levels of pollutant removals by providing more than one method of removing pollutants and providing them in successive order. Providing more than one treatment method to treat runoff ensures that pollutants are captured with a higher success rate. The treatment train process begins with routine maintenance on the grounds. Each Parcel or Tract within the Specific Plan shall pretreat the runoff with a mechanical device or equal passive treatment and detain in onsite detention basins before allowing runoff to enter the backbone Public storm drain system. The backbone Storm Drain system would discharge into the Regional Detention Basin before leaving the site via the existing lined channel at the southeast corner of the site. The Project would comply with the SQUIMP. Therefore, water quality impacts would be consistent with those analyzed in the Specific Plan EIR and no further technical studies or environmental documentation is required.

2) Would the project substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

As stated in the Specific Plan EIR, development of the business park would create a substantial increase in impervious surfaces, thus decreasing the potential for on-site soil infiltration for rainfall. Bio-infiltration, infiltration, detention filtration devices, and other BMPs would be used to treat polluted stormwater and reduce stormwater flows. These BMPs would also have the added benefit of allowing stormwater to infiltrate into the ground thus helping groundwater recharge. Therefore, the Sakioka Farms Business Park would not directly impact groundwater and potential impacts would be less than significant.

The proposed Project would include a detention basin and LID incorporated into its design. This would reduce impacts to groundwater. The proposed Project would result in the need for water service; however, the General Plan has anticipated development of the subject site and the demand of water service for typical industrial developments and is consistent with the anticipated uses and findings of the Specific Plan EIR, which were found to be less than significant.

3) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in on- or off- site flooding or exceed the capacity of existing or planned stormwater drainage systems?

The Specific Plan EIR found that flows from the site would not exceed current runoff amounts and therefore, would not increase off-site flows and erosion potential and that no streams or other natural water courses exist on-site. The Specific Plan EIR found that development on the site would have a less than significant impact with regards to drainage patterns.

The Project would generate pollutants or contaminants during construction that could be transported into local waterways. As discussed above, the City of Oxnard requires all new development within the City to incorporate stormwater quality control measures into the proposed improvement plans as part of the Ventura Countywide Stormwater Quality Urban Impact Mitigation Management Plan, NPDES Permit No. CAS004002, Order 2010-0108 for projects deemed complete prior to October 11, 2011. The Project proposes to meet the NPDES requirements consistent with the 2002 Technical Guidance Manual through the implementation of a detention basin located at the southwest corner of the Sakioka Farm Specific Plan area where all drainage confluences.

According to the Hydrologic and Hydraulic Drainage Report, the design of the site for this project is based on the VCWPD Design Hydrology Manual and Ventura County's Technical Guidance Manual for Stormwater Quality Control Measures Errata Update (June 2018). As mentioned in the Preliminary Stormwater Quality Management Plan (SWQMP), the Project would implement Low Impact Development (LID) for its site design and stormwater management. The Project proposes several locations for treatment areas through landscape planters that have been designed for Bioretention Best Management Practices (BMPs), Vegetated Swale BMPs, Proprietary Biotreatment Devices, Hydrodynamic

Devices, and Catch Basin Inserts. In addition, the Project has been designed to include water quality measures and flood control requirements and includes a detention basin at the southeast corner of the Project site.

Based on existing topography, the Project would maintain the existing drainage patterns to convey stormwater from the northwest corner to the south end of the site. By implementing BMPs throughout the site, the Project stormwater management would mimic the natural hydrology of the site by retaining rainfall on-site to the maximum extent practicable. The Project would use slopes at a minimum of 1 percent for pervious and impervious areas to limit the increase of time of concentration.

With the implementation of BMPs and the use of stormwater drainage improvements on-site, impacts related to flooding and drainage would be less than significant, consistent with the findings of the Specific Plan EIR.

4) Would the project place new structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

According to the Federal Emergency Management Agency, the Project is located within Flood Zone X, an area of minimal flood hazard (Federal Emergency Management Agency 2020). The Specific Plan EIR found impacts to flood hazards from development in flood zones to be less than significant, with no mitigation required. The proposed Project does not change this finding.

5) Would the project impede or redirect flood flows such that it would increase on- or off-site flood potential?

The response to this question is incorporated within the response to question three above.

6) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

According to the Specific Plan EIR, several dams are located at least 35 miles to the east and northeast of the City of Oxnard within Ventura and Los Angeles Counties. These include the Santa Felicia Dam at Lake Piru, the Castaic Lake Dam and the Pyramid Lake Dam. The major threat to Oxnard is upstream along the Santa Clara River corridor. Although the potential for a dam failure is considered low, should one or more of these dams fail, the entire city (including the Specific Plan area) is in the Dam Inundation Zone, also called Dam Failure Hazard Area. Damage to the City could be in the form of a wall of fast-moving water, mud, and debris. Although the Specific Plan area is in the Dam Inundation Zone, the potential for dam failure is considered extremely low. Impacts related to dam or levee failure are considered less than significant. The proposed Project does not change this finding.

7) Would the project be exposed to a substantial risk related to inundation by seiche, tsunami, or mudflow?

No impacts were determined from other flood hazards, including tsunami, seiche, or mudflow. The project site is located within the Sakioka Farm Specific Plan area and development would occur in the same area that was analyzed in the Specific Plan EIR. No new or more severe impacts would result from

the project compared to those identified in the Specific Plan EIR. Therefore, impacts would be less than significant, which is consistent with the findings of the Specific Plan EIR.

Specific Plan EIR Cumulative Impacts

Development of the Specific Plan, in combination with related projects in Oxnard, would result in further development or redevelopment in an already urbanized area. Little additional cumulative runoff would be expected since this part of the city is mostly developed with impervious surfaces. Therefore, cumulative impacts to the existing or planned stormwater drainage system would be less than significant. In addition, development of individual projects within the Specific Plan area would be subject to development and construction standards that are designed to ensure water quality and hydrological conditions are not adversely affected. All projects would be required to implement BMPs and those that disturb more than one acre would be required to conform to the existing NPDES water quality program. Therefore, cumulative water quality impacts would be less than significant. The proposed Project does not change this finding.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

With implementation of all local, State and federal rules and regulations, impacts on hydrology and water quality would be less than significant. No mitigation measures are required.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Hydrology and Water Quality not already evaluated and disclosed in the Specific Plan EIR. No new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental documentation related to Hydrology and Water Quality are not required.

3.10 Land Use & Planning

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Conflict with an applicable land use plan, policy or regulation of the City or other agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating a significant environmental effect?	Less than significant	No	No
2) Involve land uses that are not allowed under an applicable airport land use compatibility plan?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No
3) Conflict with an applicable habitat conservation plan or natural community conservation plan?	Less than significant	No	No
4) Physically divide an established community?	Less than significant	No	No

The potential Land Use impacts associated with the proposed Specific Plan were determined to be less than significant in the Specific Plan EIR. Therefore, no mitigation measures are required or recommended.

Setting

The City of Oxnard 2030 General Plan designates land uses for the Specific Plan site as Business & Research Park (BRP) and Light Industrial and requires the Specific Plan for development. The site has corresponding BRP and M-1 zone classifications. The Specific Plan area is bordered on the north by US 101, on the south by industrial uses, on the east by the Camino Real Business Park Specific Plan, and on the west by Rice Avenue. There are no existing residences located on or adjacent to the Specific Plan site.

Impact Discussion

1) Would the project conflict with an applicable land use plan, policy or regulation of the City or other agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating a significant environmental effect?

The Specific Plan EIR found impacts resulting from conflicts with applicable land use plans, policy or regulation to be less than significant. The Specific Plan identifies five primary land uses in the land use plan: business research, office, industrial, commercial, and optional residential and is included in the Oxnard 2030 General Plan. The Oxnard 2030 General Plan designates the project site as Business and Research Park and Light Industrial. The Oxnard 2030 General Plan considers the potential development of the site with up to 8,500,000 sf of business park and light industrial uses. The proposed 2,300,000 sf e-commerce fulfillment center (light industrial building) is consistent with the land use policies set forth in the Sakioka Farms Business Park Specific Plan. The proposed Project has been designed pursuant to the development guidelines established by the Sakioka Farms Specific Plan and would be consistent with the 2030 General Plan as shown in Table 11. A policy's application to a project is identified as being either a Level I, II or III, with a Level I policy having "Direct Applicability to a Proposed Policy, Project or Program," with a Level II policy having "Related or Indirect Applicability to the Proposed Policy, Project, or Program," and with a Level III policy having "No or Distance Applicability to the Proposed Policy, Project, or Program. All policies not listed are designated as Level III." Because the project implements the Sakioka Farms Specific Plan, and is consistent with the applicable land use regulations, it would have no new or more severe impacts than those identified in the Specific Plan EIR. Impacts would be less than significant.

Table 11. 2030 General Plan Policy Consistency Analysis

2030 General Plan Policy	Consistency Analysis
CD-1.10 Jobs-Housing Balance Consider the effects of land use proposals and decisions on efforts to maintain an appropriate jobs-housing balance ratio.	**Level I.** The Project is estimated to add about 2,172 jobs to the workforce. The buildout of the underlying Project area was included in a Vacant Land Study conducted in 2008. The 2005 Oxnard jobs-housing balance (JHB) was 1.19 jobs per household. Between 2005 and 2035, the 2008 Vacant Land Study estimated that Oxnard would add about 11,500 households and 37,850 jobs resulting in a 2035 JHB of 1.13, still within the acceptable JHB range (1.10 - 1.34 jobs per household).
CD-5.1 Industrial Clustering Encourage the clustering of industrial uses into areas that have common needs and are compatible in order to maximize their efficiency.	**Level I.** The Project site occupies several lots of approximately 64.6 acres within the larger 430-acre Specific Plan area that would develop up to 8.5 million square feet of commercial, business research, and light industrial uses. Municipal services are available to serve the development. The project site has access to both the freeway / road and rail infrastructure to handle goods movement without
CD-5.3 Available Services	

Encourage industrial activities to locate where municipal services are available including adequate storm drainage and water facilities, as well as easy access to multiple modes of transportation.	dividing existing neighborhoods. New roads are designed to support multi-modal transportation options. The Phase One improvements associated with the Specific Plan area subdivision address the Specific Plan EIR mitigations to install traffic improvements.
CD-5.5 "Green" Major Transportation Routes Guide industrial development to locate near transportation facilities capable of handling goods movements in an efficient manner without decreasing the level of service on the transportation network or dividing existing neighborhoods.	
CD-8.5 Impact Mitigation Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.	**Level I.** Per CEQA Guidelines Section 15168(c)(2), the 2020 CEQA Consistency Evaluation finds the project is consistent with the previous analysis and findings of the 2012 Specific Plan EIR.
CD-16.5 Industrial and Commercial Development Standards Require high quality development standards that increase the efficient use of existing industrial and commercial development areas so as to preserve agricultural land and minimize adverse environmental impacts.	**Level I.** The Project is bound to follow the Sakioka Farms Business Park Specific Plan which includes architectural and landscape standards suitable for industrial and commercial development.
ICS-1.2 Development Impacts to Existing Infrastructure Review development proposals for their impacts on infrastructure (i.e., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.	**Level I.** The Project will utilize the new public infrastructure associated with the Specific Plan subdivision. This project, and any future projects on the site will pay a range of required impact fees to the City, County, and school districts for various public facilities.
ICS-1.3 Funding for Public Facilities Continue to utilize developer fees, public facilities fees, and other methods (i.e., grant funding or assessment districts) to finance public facility design, construction, operation, and maintenance.	**Level II.** The underlying Development Agreement clause and adaptive replacement mitigation measure provide permanent funding for three additional fire personnel which would support this Project.
ICS-1.4 Infrastructure Conditions of Approval New development should not be approved unless: • The applicant demonstrates adequate public services and facilities are available; • Infrastructure improvements incorporate a range of feasible measures that can be implemented to reduce all public safety and/or environmental impacts associated with the construction, operation, or maintenance of any required improvement; • Infrastructure improvements are consistent with City infrastructure master plans; and	**Level I.** The Project will utilize the new public infrastructure associated with the Specific Plan subdivision. This project, and any future projects on the site will pay a range of required impact fees to the City, County, and school districts for various public facilities.

• Require infrastructure expansion needed for future development to be self-funding so current residents do not subsidize infrastructure needed for future growth.	
ICS-2.3 Connector Road(s) to Camarillo Feasibility Initiate a feasibility study for connecting Gonzales Road and/or Del Norte Boulevard eastward to Camarillo as an emergency route and as mitigation to offload traffic from State Highway 101 between the two cities.	**Level I.** While the Project does not increase public circulation options, it benefits from the underlying map subdivision for the Specific Plan which has been designed to accommodate a future extension of Gonzales Road eastward to Camarillo.
ICS-2.12 Gateway Enhancements Continue to enhance gateways (including but not limited to Ventura Road, Oxnard Boulevard, Vineyard AVenue, Rose Avenue, Rice Avenue, Del Norte Boulevard, Highway-101, Highway 1, Fifth Street, Channel Islands Boulevard, Pleasant Valley Road, Harbor Boulevard, Victoria Avenue and Hueneme Road).	**Level I.** The 30 ft. landscape setback along Del Norte Boulevard preserves existing views and vistas along Del Norte Boulevard,which is designated as a scenic corridor.
ICS-3.1 CEQA Level of Service Threshold Require level of service "C" as the threshold of significance for intersections during environmental review.	**Level I.** This Project will pay impact fees to the City for various traffic improvements.
ICS-3.3 New Development Level of Service C Determine as part of the development review and approval process that intersections associated with new development operate at a level of service of "C" or better. The City Council may allow an exception to level of service "D" in order to avoid impacting private homes and/or businesses, avoid adverse environmental impacts, or preserve or enhance aesthetic integrity.	
ICS-7.1 Require Transportation Demand Management Programs (TDM) Consider requiring TDM programs with preferred parking, carpool and vanpool vehicles, and ride sharing where feasible and appropriate.	**Level I.** The Project will develop a TDM program within one year of the certificate of occupancy. The TDM program shall incorporate best and commonly used trip-reduction incentives, programs, and practices found in TDMs of similar projects in terms of allowed uses, size, and transportation and transit service context.
ICS-11.3 GREAT Program Implementation Continue to implement the GREAT Program as the key program for the City's short and long term water supply	**Level I.** Project complies with the City's GREAT program and water sustainability policies.
ICS-11.6 Water Conservation and/or Recycling Connection as Mitigation Require the use of water conservation offset measures (efficient low flow fixtures and irrigation systems, drought tolerant landscaping, leak detection programs, water audits, and public awareness and education programs) and/or proportional contributions to recycled water production and/or conveyance infrastructure related to the GREAT	

Program as mitigation for water supply shortage as determined by a Water Supply Assessment, CEQA documentation, or similar analysis as part of new or master plan development review.	
ICS-11.7 Water Wise Landscapes Promote water conservation in landscaping for public facilities and streetscapes, residential, commercial and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new landscaping.	**Level I.** Project landscaping meets City and State water-conservation requirements.
ICS-12.6 Timing of Future Development Impose conditions in order to ensure adequate wastewater capacity for proposed new development.	**Level I.** The underlying infrastructure project requires that prior to recordation of the final map, the developer/project applicant shall enter into an agreement with the City which specifies the funding mechanism for all wastewater conveyance facilities.
ICS-13.3 Stormwater Detention Basins Design stormwater detention basins to ensure public safety, to be either visually attractive or unobtrusive, provide temporary or permanent wildlife habitats, and recreational uses where feasible in light of safety concerns.	**Level I.** Where feasible, the Project meets City and Watershed Protection District requirements and incorporates LID features.
ICS-13.4 Low Impact Development Incorporate low impact development (LID) alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education.	
ICS-20.5 Fire Services to New Development Require new developments to fund a fair share extension of fire services to maintain service standards, including personnel and capital improvements costs.	**Level I.** The Project is designed to accommodate the most current fire regulations for hydrant spacing and fire access and is part of the underlying Development Agreement that funds additional fire personnel for the area.
ICS-20.7 Adherence to City Standards Ensure that water main size, water flow, fire hydrant spacing, and other fire facilities meet City standards.	
ICS-20.8 Development Review Review new development applications to assess potential impacts to existing fire protection services and the need for additional and expanded services.	
ICS-20.10 Adequate Emergency Access and Routes Require that new development provide adequate access for emergency vehicles, particularly firefighting equipment, and evacuation routes, as appropriate.	

3) Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?

Potential conflicts with an applicable habitat conservation plan or natural community conservation plan was evaluated in the Biological Resources section of the Specific Plan EIR and is addressed in Section 3.4 Biological Resources of this Consistency Evaluation which concluded the Specific Plan EIR found no conflict with any local policies or ordinances protecting biological resources. The Specific Plan area is not subject to any habitat or natural community conservation plan. The proposed project is consistent with these findings. There would be no impact.

4) Would the project physically divide an established community?

As discussed previously, the Sakioka Farm Specific Plan area is bordered on the north by US-101, on the south by industrial uses, on the east by the Camino Real Business Park Specific Plan, and on the west by Rice Avenue. There are no existing residences located at or adjacent to the Project site. As such, no established residential community exists at the project site or in the project vicinity, and the Specific Plan EIR determined that the implementation of the Sakioka Farms Business Park Specific Plan would not physically divide an established community or impact mobility between a community and outlying areas. The proposed Project would result in light industrial development in the Specific Plan Area consistent with the Specific Plan. Impacts would be less than significant.

Specific Plan EIR Cumulative Impacts

The Specific Plan EIR determined that development of the Specific Plan in conjunction with related projects would result in further "infilling" of various urban land uses in Oxnard. Each related project would be subject to individual review for conformance to current land use designations and zoning, and for compatibility with surrounding land uses. Additionally, each related project would be subject to independent environmental review. These procedures would provide assurances that potential cumulative impacts related to land use consistency and compatibility would generally be less than significant. The proposed Project does not change this finding.

Impacts not Explicitly Analyzed in the Specific Plan EIR

The Specific Plan EIR did not analyze whether Specific Plan implementation would involve land uses not allowed under an applicable airport land use compatibility plan. However, at the request of the County of Ventura, Department of Airports, MM G-8 was included in the Specific Plan Final EIR to ensure impacts would be less than significant.

2) Would the project involve land uses that are not allowed under an applicable airport land use compatibility plan?

The entire Specific Plan area is in the planning area and protection zones for the Camarillo Airport. The eastern-most part of the Specific Plan area is in the Extended Traffic Pattern Zone (ETPZ) for Camarillo Airport as designated in the Airport Comprehensive Land Use Plan for Ventura County (Ventura County Airport Land Use Commission 2000). Most business research, office, commercial, and light industrial

uses are compatible with the ETPZ, according to the compatibility standards in the Ventura County Airport Comprehensive Land Use Plan with a recommended maximum structural coverage of no more than 50 percent. No residential units would be located within the ETPZ boundary. The Specific Plan site is not located in the vicinity of any other airstrips that have regular operations over the site. Implementation of the proposed Project was fully anticipated as part of the Specific Plan EIR, and would not result in any new or more severe impacts to the Airport Comprehensive Land Use Plan. However, at the request of the County of Ventura, Department of Airports, MM G-8 was included in the Specific Plan FEIR to ensure impacts to the ACLUP would be less than significant.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

No mitigation measures are required.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

Note: This mitigation measure is no longer applicable to any phase of development of the Specific Plan as the 2030 General Plan was adopted in 2011 and updated in 2016, and did not identify new or modified mitigations. This mitigation measure is included for informational purposes only.

MM B-1: If the Oxnard 2030 General Plan is adopted before the Final Sakioka Farms EIR is certified or the Development Services Director determines that the Sakioka Farms Specific Plan final adoption actions are likely to occur after adoption of the Oxnard 2030 General Plan, a 2030 General Plan consistency analysis shall be completed by the City and reimbursed by the Applicant. The 2030 General Plan consistency analysis shall, at a minimum, be prepared as an Addendum to the Draft or Final Sakioka Farms EIR, whichever is applicable. If the 2030 General Plan consistency analysis identifies significant impacts and/or new or modified mitigations, the appropriate CEQA required actions shall be taken, the costs of which are to be reimbursed by the Applicant consistent with the City's CEQA review policies and practices.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Land Use and Planning not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Land Use and Planning are not required.

3.11 Mineral Resources

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Result in the loss of availability of a known mineral resource of value to the region or State?	No impact	No	No
2) Result in the loss of availability of a locally important mineral resource recovery site delineated in the Oxnard 2030 General Plan or other adopted land use plan?	No impact	No	No

The Specific Plan EIR found there would be no impacts to Mineral Resources associated with the Specific Plan. Therefore, no mitigation measures are required or recommended.

Setting

The City of Oxnard 2020 General Plan designates project site land uses as BRP and Light Industrial and requires the Specific Plan for development. The project site has corresponding BRP and M-1 zone classifications.

Impact Discussion

1) Would the project result in the loss of availability of a known mineral resource of value to the region or State?

The response to this question is incorporated within the response to the next question.

2) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated in the Oxnard 2030 General Plan or other adopted land use plan?

The Specific Plan EIR found no impact to mineral resources impacted by Specific Plan implementation-induced changes to the environment. No oil extraction or mineral extraction activities are presently conducted on the project site. The project site is not within an area where significant mineral deposits are present. There is no known locally significant mineral resource on the site.

Therefore, no impacts would occur, and no mitigation measures are required. The proposed Project does not change this finding.

Specific Plan EIR Cumulative Impacts

The Specific Plan EIR determined there was no evidence that the Specific Plan would cause significant environmental effects to mineral resources and therefore, no cumulative discussion was provided. The City certified the 2030 General Plan Program EIR, which considered the possible environmental impacts of build-out to 2030, including the Specific Plan as approved. The 2030 General Plan Final Program EIR found that significant and unavoidable impacts would occur to the following resources: Air Quality and Greenhouse Gases; Agricultural Resources; Circulation, Traffic and Transportation; and Noise. All other environmental impacts were found to be less than significant with implementation of mitigating policies and programs. The proposed Project does not change this finding.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

No mitigation measures are required.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Mineral Resources not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Mineral Resources are not required.

3.12 Noise

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Generate or expose persons to noise levels exceeding standards established in the Oxnard 2030 General Plan or Noise Ordinance, or applicable standards of other agencies?	Less than significant	No	No
2) Generate or expose persons to excessive groundborne vibration or groundborne noise levels?	Less than significant	No	No
3) Generate a substantial temporary or periodic increase in ambient noise in the project vicinity above levels existing without the project?	Less than significant	No	No
4) Generate a substantial permanent increase in ambient noise in the project vicinity above levels existing without the project?	Significant	No	No
5) For a project located within the airport land use plan for Oxnard Airport or within two miles of Naval Base, Ventura County at Point Mugu, would the project expose people residing or working in the project area to excessive noise levels?	Less than significant	No	No
6) Expose non-human species to excessive noise?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No

The Specific Plan EIR determined that construction of the Sakioka Farms Specific Plan area would have a less than significant impact with respect to construction noise, as construction would comply with the Oxnard City Code allowable hours and because the nearest sensitive receivers (residences located north across the US 101) are too far to be impacted. Vibration from construction would not exceed levels that could damage buildings or annoy humans at sensitive receiver sites.

The Specific Plan EIR determined traffic noise levels would not exceed General Plan Noise Element standards at the Specific Plan site of 75 A-weighted decibels (dBA) community noise equivalent level (CNEL) for industrial, office, and commercial uses. Noise level increases from traffic modeled in the Specific Plan EIR would increase by up to 1.7 dBA CNEL on Gonzales Road from Rice Avenue to Rose Avenue, which is inaudible/imperceptible to most people and would not exceed the identified thresholds of significance. However, the Specific Plan EIR determined that these increases would contribute to cumulative noise impacts, as cumulative noise levels on this section of roadway exceeded 3.0 dBA CNEL; thus, the Specific Plan build out would contribute in a manner considered cumulatively considerable. Regarding this impact and per Public Resources Code Section 21081(b), the City Council found that the overriding economic, legal, social, technological, or other benefits of Specific Plan implementation outweighed the unavoidable, adverse, cumulative environmental effects of Specific Plan implementation on roadway noise.

Setting

The primary source of noise in the area is vehicular traffic on US 101. The Specific Plan EIR showed that existing roadway noise levels in the area range from 62 to 74 dBA CNEL. Existing noise levels on site include the operation of farming equipment.

A project-level Noise Impact Analysis was prepared for Project Bruin in June 2020 by First Carbon Solution. The document is used herein to support this discussion and incorporated by reference. The findings of the project-level noise analysis are consistent with the findings of the Specific Plan EIR.

Impact Discussion

1) Would the project generate or expose persons to noise levels exceeding standards established in the Oxnard 2030 General Plan or Noise Ordinance, or applicable standards of other agencies?

The proposed project would generate noise from operational mobile sources. The FHWA highway traffic noise prediction model (FHWA RD-77-108) was used to evaluate existing and cumulative traffic noise conditions in the vicinity of the project site. The projected traffic noise levels along roadways adjacent to the project site were analyzed to determine compliance with the City's land use compatibility standards. The daily traffic volumes were obtained from the Transportation Assessment Report prepared for the project by Linscott, Law & Greenspan ([LLG] 2020). The resultant noise levels were weighed and summed over a 24-hour period to determine the A-weighted decibel (dBA) CNEL values. Table 12 shows a summary of the traffic noise levels for Existing, Existing with Phase 1 Project, Future 2023 without

Project, and Future 2023 with Phase 1 Project conditions as measured at 50 feet from the centerline of the outermost travel lane.

Table 12. Traffic Noise Model Results Summary

Roadway Segment	Existing (dBA) CNEL	Existing w/Phase 1 Project (dBA) CNEL	Increase over Existing (dBA)	Future 2020 without Project (dBA) CNEL	Future 2023 with Phase 1 Project (dBA) CNEL	Increase over Future 2023 without Project (dBA)
Rice Avenue-US-101 to East Gonzales Road	69.7	70.6	0.9	69.9	70.7	0.8
Rive Avenue-Gonzales Road to Camino del Sol	71.8	73.3	1.5	72.0	73.4	1.4
Gonzales Road-Rose Avenue to Rice Avenue	68.2	69.0	0.8	68.4	69.2	0.8
Del Norte Boulevard-US-101 to Camino del Sol	68.1	69.6	1.5	68.3	69.7	1.4

Source: First Carbon 2020

The traffic noise model results show that projected traffic noise levels west of the project site along Rice Avenue, between East Gonzales Road and Camino Del Sol, would range up to 73.4 dBA CNEL as measured at 50 feet from the centerline of the outermost travel lane under Future 2023 with Phase 1 Project conditions. The nearest façade of the proposed building would be setback approximately 2,375 feet from the centerline of this roadway segment. At this distance, traffic noise levels from Rice Avenue would range up to approximately 40 dBA CNEL at this building's nearest façade. These noise levels are well within the State's normally acceptable range of up to 75 dBA CNEL for new Industrial developments.

Projected traffic noise levels east of the project site along Del Norte Boulevard, between US-101 and Camino Del Sol, would range up to 69.7 dBA CNEL as measured at 50 feet from the centerline of the outermost travel lane under Future 2023 with Phase 1 Project conditions. The nearest façade of the proposed building would be set back approximately 680 feet from the centerline of this roadway segment. At this distance, traffic noise levels from Del Norte Boulevard would range up to approximately 47 dBA CNEL at this building's nearest façade.

These noise levels are well within the State's normally acceptable range of up to 75 dBA CNEL for new industrial land use developments. Therefore, the project would have a less than significant impact on traffic noise levels, which is consistent with the findings of the Specific Plan EIR.

The proposed project would also generate noise from operational stationary sources, including parking lot activities, which includes people conversing, doors shutting, engine startup, and slow-moving vehicles; truck delivery, loading and unloading activities at proposed loading areas; and from new exterior mechanical equipment sources, such as mechanical ventilation equipment.

Customer and employee parking activities, which include vehicles cruising at slow speeds, doors shutting, or cars starting, would generate noise levels of approximately 60 dBA to 70 dBA Lmax at 50 feet. Parking lot activities would be expected to occur sporadically throughout the day, as customers and employees arrive and leave the parking lot areas. The nearest noise- sensitive receptors to the proposed parking areas are the single-family residences located west of the project site on Graves Avenue. The closest home would be located more than 3,300 feet from the proposed parking areas. At this distance, noise levels from parking lot activities would attenuate to approximately 34 dBA Lmax, well below the City's nighttime exterior noise level threshold of 50 dBA Leq (30 minutes). Additionally, these noise levels would not exceed the City's nighttime interior noise level threshold of 45 dBA Leq (five minutes). Therefore, the resulting noise levels would not exceed any standard established by the City at any noise-sensitive land use in the project vicinity, and the impact of noise produced by project-related parking lot activities to sensitive off-site receptors would be less than significant, consistent with the findings of the Specific Plan EIR.

Noise would also be generated by truck delivery, loading, and unloading activities at the loading areas of the proposed project site. Typical noise levels from this type of loading and unloading activity can range from 70 dBA to 80 dBA Lmax as measured at 50 feet. Proposed commercial loading and unloading areas would be located more than 3,900 feet from the nearest off-site noise-sensitive receptors, which are the single-family residences located west of the project site on Graves Avenue. At this distance, activities at loading and unloading areas could result in intermittent noise levels ranging up to approximately 42 dBA Lmax at the closest residential home. These noise levels would not exceed the City's nighttime exterior noise level threshold of 50 dBA Leq (30 minutes) or nighttime interior noise level threshold of 45 dBA Leq (five minutes) at any noise-sensitive land use in the project vicinity. Therefore, the impact of noise levels generated by commercial truck loading and unloading activities to sensitive off-site receptors would be less than significant.

Noise levels from typical mechanical ventilation equipment are anticipated to range up to approximately 60 dBA Leq at 25 feet. Proposed mechanical ventilation systems at the project site could be located as close as 3,740 feet from the nearest noise-sensitive receptors which are the single-family residences located west of the project site on Graves Avenue. At this distance, noise levels generated by this equipment would attenuate to approximately 17 dBA Leq, to well below the City's nighttime exterior noise level threshold of 50 dBA Leq (30 minutes). Additionally, these noise levels would not exceed the City's nighttime interior noise level threshold of 45 dBA Leq (five minutes). Therefore, the resulting noise levels would not exceed any standard established by the City at any noise-sensitive land use in the project vicinity, and the impact of mechanical ventilation equipment operational noise levels to sensitive off-site receptors would be less than significant.

Therefore, operational noise levels generated by stationary noise sources at the proposed project site would have a less than significant impact on noise-sensitive receptors in the project vicinity, which is consistent with the findings of the Specific Plan EIR.

2) Would the project generate or expose persons to excessive groundborne vibration or groundborne noise levels?

Of the variety of equipment used during construction, the large vibratory rollers that are anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Impact equipment that can result in large vibration levels such as pile drivers are not expected to be used during construction. Large vibratory rollers produce groundborne vibration levels ranging up to 0.210 inch per second (in/sec) peak particle velocity at 25 feet from the operating equipment.

The closest off-site structure to the proposed construction areas is an industrial building located south of the project site. The facade of this building would be located approximately 480 feet from the proposed construction footprint where heavy equipment would operate. At this distance, groundborne vibration levels would attenuate to less than 0.003 in/sec peak particle velocity from the operation of a small vibratory roller. These levels are well below the Federal Transit Administration's Construction Vibration Impact Criteria of 0.12 for the most sensitive types of structures. Therefore, construction-related groundborne vibration levels would have a less than significant impact on off-site receptors in the project vicinity, which is consistent with the findings of the Specific Plan EIR.

Implementation of the project would not include any permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity to which the proposed project would be exposed. Therefore, project operational groundborne vibration level impacts would be considered less than significant, consistent with the findings of the Specific Plan EIR.

3) Would the project generate a substantial temporary or periodic increase in ambient noise in the project vicinity above levels existing without the project?

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the project site. Because project construction workers and construction equipment would use existing routes, noise from passing trucks would be like existing vehicle-generated noise on these local roadways. In addition, these trips would not result in a doubling of daily traffic volumes on any of the local roadways in the project vicinity and would thus not result in a perceptible change in existing traffic noise levels. For this reason, intermittent noise from construction trips would be minor when averaged over a longer time-period and would not be expected to result in a perceptible increase in hourly- or daily-average traffic noise levels in the project vicinity. Therefore, construction-related noise impacts associated with the transportation of workers and equipment to the project site would be less than significant, consistent with the findings of the Specific Plan EIR.

The second type of short-term noise impact is related to noise generated during construction on the project site. The nearest noise-sensitive receptors to the project site are the single-family residences located west of the project site on Graves Avenue. The closest residential home would be located more

than 3,260 feet from the acoustic center of construction activity where multiple pieces of heavy machinery would operate. The acoustic center refers to a point equidistant from multiple pieces of equipment operating simultaneously which would produce the worst-case maximum noise level. At this distance, worst-case construction noise levels could range up to approximately 54 dBA Lmax, intermittently, and could have an hourly average of up to 50 dBA Leq, at the façade of the nearest single-family residential home. These noise levels would not exceed existing background daytime noise levels as measured at the nearest off-site sensitive receptor.

The project would comply with the permissible construction hours established by the Oxnard City Code, which would ensure that noise produced by construction activities would not occur during nighttime hours, and it would reduce potential impacts that could result in annoyance or sleep disturbances at nearby sensitive receptors. The City's Code of Ordinances limits noise associated with or created by construction repair, remodeling or grading of any real property to between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturday. Given the aforementioned, construction noise levels would not expose persons in the project vicinity to a substantial temporary increase in ambient noise levels.

4) Would the project generate a substantial permanent increase in ambient noise in the project vicinity above levels existing without the project?

The highest traffic noise level increase with implementation of the Project would occur along Rice Avenue between Gonzales Road and Camino Del Sol, and along Del Norte Boulevard between US-101 and Camino Del Sol. Along these roadway segments, the project would result in an increase of 1.5 dBA under Existing with Phase 1 project conditions compared to conditions that would exist without the project. This increase is well below the 5 dBA increase that would be considered substantial. Therefore, the impact would be less than significant.

As is shown in the impact discussion of Noise Impact 1, new stationary noise sources resulting from implementation of the Project would not result in noise levels above existing ambient noise levels as measured at off-site sensitive receptors. Existing traffic noise levels along Rice Avenue, adjacent to the nearest off-site sensitive receptors, range up to 71.8 dBA CNEL. The maximum operational noise level generated by Project-related stationary noise sources would range up to 42 dBA Lmax. These highest stationary source operational noise levels are well below existing traffic noise levels in the vicinity of the nearest noise sensitive receptors.

Therefore, Project-related stationary sources would not result in a substantial permanent increase compared with noise levels existing without the Project, and noise impacts on off-site receptors would be less than significant. Further, Project-related stationary sources would not result in a substantial permanent increase of 5 dBA or greater compared with noise levels existing without the Project, and noise impacts to off-site sensitive receptors would be less than significant, consistent with the findings of the Specific Plan EIR.

5) For a project located within the airport land use plan for Oxnard Airport or within two miles of Naval Base, Ventura County at Point Mugu, would the project expose people residing or working in the project area to excessive noise levels?

The Specific Plan site is not located within the airport land use plan for Oxnard Airport or within 2 miles of Naval Base Ventura County Point Mugu or private airstrip. The nearest public airport to the site is Camarillo Airport, located approximately 1.1 miles to the east. Because of its distance from the airport runways, the Specific Plan site is outside of the 60 dBA CNEL airport noise contours. Therefore, implementation of the Specific Plan would not expose persons visiting or working at the Specific Plan site to noise levels from airport activity that would be in excess of normally acceptable standards established by the City or in an airport land use plan. Impacts associated with public airport noise would be less than significant.

Specific Plan EIR Cumulative Impacts

The consideration of cumulative noise impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of the short range of noise levels before they are attenuated below ambient noise levels. It is unlikely that Specific Plan project construction would occur within a few hundred yards of major offsite construction, and as described above it would be temporary. Therefore, Specific Plan implementation would not result in a cumulatively considerable construction noise impact.

The Specific Plan EIR found significant and unavoidable cumulative noise impacts would occur primarily because of increased operational traffic on Gonzales Road from Rice Avenue to Rose Avenue. The Specific Plan EIR found that no mitigation measures are feasible to reduce the cumulative roadway noise impacts along Gonzales Road between Rice Avenue and Rose Avenue. With regard to the Specific Plan and per Public Resources Code Section 21081(b), the City found that the specific overriding economic, legal, social, technological, or other benefits of the Specific Plan outweigh the unavoidable adverse environmental effects of the cumulative effects to roadway noise that could be generated by implementation of the Specific Plan. The Project would result in operational traffic that would contribute to the significant and unavoidable cumulative noise impact; the proposed Project does not change this finding and is consistent with the Specific Plan EIR.

Impacts not Explicitly Analyzed in the Specific Plan EIR

In May 2017, the City adopted an updated CEQA Checklist to include threshold question six. Because the City's CEQA Consistency Evaluation was implemented after the adoption of the Specific Plan, impacts related to noise impacts to non-human species were not explicitly discussed in the Specific Plan EIR.

6) Would the project expose non-human species to excessive noise?

Operational noise would not result in a substantial permanent increase over existing ambient noise levels. Therefore, the proposed project would not expose non-human species to noise levels that are

substantially higher than existing ambient noise levels and would result in a less than significant impact in this regard.

Based on the BRA, construction noise could have a possible impact on nesting birds if construction occurs during the nesting season, February 1 to August 31. If this is the case, as recommended in the BRA, a preconstruction nesting bird survey must be conducted prior to the start of construction activities to reduce this impact to less than significant. Based on the literature search and field survey analyzed in the BRA, the project site and survey area do not contain suitable habitat for special-status wildlife species within the project site. Therefore, the presence of special-status wildlife is not likely to occur on-site or within the survey area, and no further studies are necessary, and no mitigation measures are required.

Additionally, the proposed project site contains open farmland and is immediately surrounded by roads, a highway, and commercial/industrial buildings. The project site has a low potential to be utilized by regional wildlife as a movement corridor. Therefore, impacts on non-human species from project-related noise would be less than significant and no mitigation would be required.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

Construction Noise

No mitigation measures are required.

Operational Noise

The Specific Plan, together with other pending urban development projects in the City, will result in cumulative roadway noise impacts along Gonzales Road between Rice Avenue and Rose Avenue for which no mitigation measures are feasible and that are considered significant and unavoidable. Accordingly, a Statement of Overriding Considerations was prepared in accordance with CEQA and included within the resolution approving the Specific Plan.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts from Noise not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Noise are not required.

3.13 Population, Education & Housing

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Would the project involve a General Plan amendment that could result in an increase in population beyond that projected in the Oxnard 2030 General Plan that may result in one or more significant physical environmental effects?	No impact	No	No
2) Would the project induce substantial unplanned growth on the project site or surrounding area, resulting in one or more significant physical environmental effects?	Less than significant	No	No
3) Would the project result in a substantial (15 single-family or 25 multifamily dwelling units—about one-half block) net loss of housing units through demolition, conversion, or other means that may necessitate the development of replacement housing?	No impact	No	No
4) Would the project result in a net loss of existing housing units affordable to very low- or low income households (as defined by federal and/or City standards), through demolition, conversion, or other means that may necessitate the development of replacement housing?	No impact	No	No
5) Would the project cause an	Less than	No	No

increase in enrollment at local public schools that would exceed capacity and necessitate the construction of new or expanded facilities?	significant with mitigation		
6) Would the project directly or indirectly interfere with the operation of an existing or planned school?	Less than significant	No	No

The potential Population, Education, and Housing impacts associated with the proposed Specific Plan were determined to be less than significant in the Specific Plan EIR. Therefore, no mitigation measures are required or recommended for the TTM and Phase I site improvements.

Setting

The Specific Plan EIR stated California Department of Finance (DOF) estimated the City's January 1, 2009 population at 197,067. The City of Oxnard 2030 General Plan estimates that the population of Oxnard will grow to 285,521 by 2030, following market trends for housing development. The current estimated population of Oxnard is 209,879 (DOF 2020).

The Specific Plan EIR also evaluated the ratio of jobs to housing units in a community or given geographic area, a statistic often used to evaluate a community's relative success in balancing jobs-producing and residential land uses. A Vacant Land Study was conducted in 2008 based on the Specific Plan area being developed with industrial and commercial space under full build-out of the General Plan. The 2005 Oxnard jobs-housing balance (JHB) was 1.19 jobs per household. Between 2005 and 2035, the 2008 Vacant Land Study estimated that Oxnard would add about 11,500 households and 37,850 jobs resulting in a 2035 JHB of 1.13, still within the acceptable JHB range (1.10 - 1.34 jobs per household).

The Specific Plan site is in the Rio School District, which serves northern Oxnard and the El Rio area and provides education services to over 5,050 students through five elementary schools, one K-8 school academy, and two middle schools (Rio School District 2020). It is also in the Oxnard Union High School District, which provides service to over 16,000 students through ten high schools, one alternative education school, and one adult school (Oxnard Union High School District 2020).

Impact Discussion

1) Would the project involve a General Plan amendment that could result in an increase in population beyond that projected in the 2030 General Plan that may result in one or more significant physical environmental effects?

The 2030 General Plan considered build-out to 2030, including the Specific Plan as approved. The proposed Project does not require a Specific Plan or General Plan Amendment. There would be no impact resulting in an increase in population beyond that projected in the 2030 General Plan.

2) Would the project induce substantial growth on the project site or surrounding area, resulting in one or more significant physical environmental effects?

Implementation of the Specific Plan, and therefore the proposed Project, would increase indirect population growth through creating new jobs. Construction would result in increased employment opportunities during construction periods. However, the Specific Plan EIR laid out multiple reasons why the employment opportunities provided by the construction of the Specific Plan, including anticipated building in Planning Area 5 (i.e., proposed Project) would not likely result in household relocation by construction workers to the vicinity of the Specific Plan area (City of Oxnard 2011b: 396-397). At build-out, the Specific Plan could generate opportunities for up to 15,489 jobs. This growth would be consistent with population and housing forecasts by the City, Ventura Council of Governments, and Southern California Association of Governments.

The proposed Project would generate up to 2,172 new jobs, or 14 percent of the jobs analyzed under the Specific Plan EIR. According to the California Employment Development Department, Ventura County has an unemployment rate of 5.6 percent as of April 2020 (Employment Development Department 2020). It is expected that jobs generated from project implementation would largely draw upon the local labor force.

Jobs generated by the proposed Project would be within the number of proposed job opportunities analyzed in the Specific Plan. Therefore, impacts related to indirect population growth would continue to be less than significant, consistent with the Specific Plan EIR, and further technical studies or environmental documentation are not required.

3) Would the project result in a substantial (15 single-family or 25 multi-family dwelling units— about one-half block) net loss of housing units through demolition, conversion, or other means that may necessitate the development of replacement housing?

The response to this question is incorporated within the response to the next question.

4) Would the project result in a net loss of existing housing units affordable to very low- or low- income households (as defined by federal and/or City standards), through demolition, conversion, or other means that may necessitate the development of replacement housing?

The Specific Plan area is currently an agricultural use and the proposed development would not remove existing housing (including affordable units) or displace people, necessitating the construction of replacement housing. Therefore, the project would not result in a net loss of existing housing units affordable to very low- or low- income households (as defined by federal and/or City standards), through demolition, conversion, or other means that may necessitate the development of replacement housing. There would be no impact.

5) Would the project cause an increase in enrollment at local public schools that would exceed capacity and necessitate the construction of new or expanded facilities?

The Specific Plan would result in population growth that could increase enrollment at schools. To offset a project's potential impact on schools, Government Code 65995 (b) establishes the base amount of allowable developer fees a school district can collect from development projects located within its boundaries. The fees obtained by RSD and OUHSD are used to maintain the desired school capacity and the maintenance and/or development of new school facilities. The project proponents for any future residential developments would be required to pay the state-mandated school impact fees. Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization."

The proposed project would create 1,000–2,172 new jobs on the project site. This increase in jobs is consistent with what was anticipated in the Specific Plan EIR. The proposed project would be required to implement MM M.3-1 of the Specific Plan EIR, which requires developer(s) implementing projects under the Specific Plan to pay all applicable school fees to offset the impact of additional student enrollment at schools commensurate with the increase in jobs. Impacts would be less than significant with the implementation of mitigation, which is consistent with the findings of the Specific Plan EIR.

6) Would the project directly or indirect interfere with the operation of an existing or planned school?

Development of the proposed project would not directly or indirectly interfere with the operation of an existing or planned school. The nearest school to the project site is Rio Rosales Elementary School, 0.6 mile away at 1001 Kohala Street, Oxnard. In 2017, the Oxnard School District voted in 2017 to move forward with the purchase of a 25-acre plot of land at the intersection of Doris Avenue and Patterson Road for the development of elementary and middle schools. This school site is over 4 miles from the Specific Plan area. Construction of the proposed Project would not directly or indirectly interfere with the operation of this existing or planned school site.

Specific Plan EIR Cumulative Impacts

The Specific Plan EIR found the Specific Plan and related projects would contribute to cumulative population, housing, and employment growth in Oxnard. The commercial and industrial projects as of June 2009 would generate a combined increase of approximately 6,116 employees. Based on a high estimate of one new housing unit per new employee, the cumulative employment would indirectly result in demand for approximately 6,116 new residences in the area. However, this is a conservative estimate of new permanent residents and households, as new employment positions are often filled from the existing community and typically do not result in relocation into the area to be closer to the place or work.

Based on a population increase of approximately 88,454 persons between the analysis under the Specific Plan EIR and the assumed 2030 General Plan build-out, the development of the related projects would

not indirectly induce substantial cumulative population and housing growth as a result of new employment opportunities (which represent about seven percent of the planned growth), and the associated cumulative impact would be less than significant. Therefore, the cumulative population and housing growth would not be considerable, and cumulative impacts associated with population and housing would be less than significant. The proposed Project would be consistent with the conditions analyzed in the SPecific Plan EIR and implementation of the Project would not change this finding.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

In order to reduce impacts to Population, Education and Housing to the extent feasible, the Specific Plan EIR imposed a number of mitigation measures. The following mitigation measure would apply to this Project:

MM M-3.1: This is an adaptive management mitigation measure. The subsequent developer(s) under the Specific Plan would be required to pay all applicable school fees to offset the impact of additional student enrollment at schools. No other mitigation measures are required as part of the environmental review process unless State law changes to allow subsequent environmental reviews to identify appropriate, feasible mitigations to reduce a significant impact on schools to a level below the significance threshold.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

The following Specific Plan EIR mitigation measure reduces the impact associated with the impacts to Population, Education and Housing; however, these mitigation measures do not apply to this individual Project:

MM L-1: If there is a housing component within the Project of over 10 units, ten percent of the total units within each project or a percentage determined by an economic impact assessment that estimates the need for very low and low income housing created by actual and anticipated development with the Specific Plan, whichever percentage is higher but not to exceed 23 percent, would be developed as affordable housing in a manner consistent with the City's inclusionary housing program for qualified low and moderate income households, to be determined by an economic impact assessment that estimates the need for very low and low income housing created by the actual and anticipated development and the wages paid to their employees. This information shall also be reflected in the Specific Plan document under section 4.7, Affordable Housing.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Population, Education, and Housing not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the

exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Population, Education, and Housing are not required.

3.14 Public Services & Recreation

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Would the project increase demand for fire protection service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?	Less than significant with mitigation	There are no new or substantially more severe significant impacts from the TTM and Phase I site improvements. The lead agency has provided alternative and comparable mitigation to replace MM M.1-1. The project proponent has agreed to implement the alternative mitigation.	No
2) Would the project increase demand for law enforcement service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?	Less than significant with mitigation	No	No
3) Would the project increase the use of existing park facilities such that substantial physical deterioration of the facilities would occur or be accelerated or that new or expanded park facilities would be needed to maintain acceptable service levels?	Less than significant	No	No
4) Would the project increase the need for or use of existing library or other community facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	Less than significant	No	No

The Specific Plan EIR found that impacts to fire and police services would be less than significant with mitigation. The lead agency has determined that since the certification of the Specific Plan EIR, MM

M.1-1 is no longer relevant for reducing Specific Plan impacts related to fire services. Adaptive, comparable mitigation is provided herein and would be included as a condition of project approval. The project proponent has agreed to the alternative mitigation provided herein and the implementation of the alternative mitigation measure would reduce the potential impact to fire service to less than significant levels, comparable to the findings of the Specific Plan EIR. Impacts to parks and libraries were found to be less than significant.

Setting

Fire Services

Fire prevention, fire suppression, and emergency medical services are provided throughout Oxnard by the Oxnard Fire Department (OFD). According to the Specific Plan EIR, in 2010, OFD provided fire protection and paramedic services to the project from seven fire stations. The OFD was staffed by 87 uniformed members, with 28 on duty per shift. The National Fire Protection Association (NFPA) recommended standard for fire department staffing is one firefighter per 1,000 residents. Oxnard's ratio at the time of Specific Plan EIR publication was one firefighter per approximately 2,300 residents. NFPA recommends one fire station for every 15,000 residents. The NFPA recommends each fire station service approximately 15,000 residents. Oxnard's seven fire stations served approximately 30,000 residents per station. The nearest fire station to the Specific Plan area was, and continues to be, Fire Station 5, located at 1450 Colonia Road, approximately 2 miles west of the site.

The 2019 population of Oxnard was 209,879 (DOF 2020). There are eight fire stations in Oxnard as of April 2020 (City of Oxnard 2020a). The OFD is staffed by 124 uniformed members, with 36 on duty per shift. Based on the current population, Oxnard's ratio at the time this report was written is one firefighter per approximately 1,693 residents, and the eight fire stations serve approximately 26,000 residents per station. The Fire Department can access additional manpower and equipment through an automatic aid agreement with Ventura County and mutual aid agreements with the City of Ventura and Point Mugu Naval Air Station.

The Specific Plan EIR found that several areas were outside the reach of a response unit within desired response time objectives, including the Specific Plan area. In 2010, OFD projected the need for three more fire stations to provide sufficient response to meet existing and future needs, each with an engine apparatus and three assigned staff. Station 8, located at 3000 South Rose Avenue, was built since that evaluation and operates now. OFD's goal in response to a call for emergency services is to have a fire unit on the scene within five minutes. Improvements in technology have contributed to improved response times, and they continue to be equal to or better than the response times anticipated in the Specific Plan EIR, even though only one of the three expected stations has been built. The average response time at the time of the Specific Plan EIR publication was five minutes, seven seconds. In 2019, the average response time was five minutes, five seconds.

Police Services

The Oxnard Police Department (OPD) is the local law enforcement agency responsible for providing police services to the Specific Plan area. The OPD operates several police storefronts and drop-in centers, but major operations are based in the Public Safety Building at 251 South C Street in Oxnard. The Patrol Division is part of OPD's Field Services Bureau and has four districts; the Specific Plan area and the project site are in the North Oxnard District, Beat 12 (OPD 2020). In 2010, the OPD had 238 sworn officers and 152 civilian personnel. The estimated 2010 population of Oxnard was 200,000, making the 2010 ratio 1.2 officers per 1,000 people. The OPD states its target service ratio is 1.3 officers per 1,000 residents. The 2019 population of Oxnard was 209,879 (DOF 2020). The OPD has 249 sworn officers and 126 civilian personnel. Based on the current population of the City, Oxnard's ratio today is 1.9 police officers per 1,000 people.

Police units are often mobile, making actual distance between a headquarters facility and the project site less relevant. Instead, the number of officers on the street relates more directly to the realized response time. OPD has no official goal for emergency calls but strives to respond within five minutes or less. The OPD uses a metric of 0.5 police calls per year per resident. In 2007, OPD handled an average of 1,176 calls for service per year per patrol officer. In 2019, OPD handled an average of 1,134 calls for service per year per patrol officer. The optimum number is no more than 550 calls for service per person per patrol officer.

Park Services

The City of Oxnard Public Works Park Division manages all municipally owned and operated recreation and park facilities in Oxnard. In 2006, the department operated and maintained 453 park acres in 41 parks, which included a range of services and facilities. With a 2008 population of approximately 195,000 residents, the department had a ratio of 2.32 acres/1,000 residents. Oxnard's estimated 2019 population was 209,879 (DOF 2020). As identified in the City of Oxnard 2030 General Plan, approximately 759 acres of developed or planned parks are in Oxnard (2030 General Plan page 1-21). There will be about 2.76 acres of park facilities per 1,000 residents, which is better than what was analyzed in the Specific Plan EIR. If regional parks, beaches, and other accessible open space are all considered, then the parkland available to Oxnard residents is higher.

Libraries

The Oxnard Public Library (OPL) provides library services throughout the city at three locations: Downtown Main Library, South Oxnard Center Library, and the Colonia Branch Library. The Colonia Branch is closest to the Specific Plan area. The OPL has nearly 400,000 items in its collection. The State of California library standards are a goal of 0.5 sf of library facility per resident. The 1996 American Library Association minimum standard for public library space was 0.6 sf per person residing in the library's service area. In the 1990s, the ALA standard was increased to 1.0 sf per resident. Specific Plan EIR Table IV.M-8 shows the need for additional library space to adequately serve the Oxnard community through 2020.

Impact Discussion

1) Would the project increase demand for fire protection service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?

Assumed Fire Station No. 10

The Specific Plan includes a 1.5-acre site for a new fire station (Station 10) near Rice Avenue and the easterly extension of Gonzales Road. The Specific Plan EIR determined construction of a fire station in the Specific Plan would service the project area and eastern Oxnard with adequate response time and distance.

In early 2020, the City determined that adding a fourth firefighter on each shift at the nearest fire station (Station 5) would provide the recommended response time to the Specific Plan area, negating the need to construct and staff a fire station in the Specific Plan vicinity. The City found constructing a new fire station on the eastern edge of Oxnard not to be the best use of resources. This approach assumes that the Specific Plan area does not include specific types of uses, including residential developments and High Hazard Occupancies from Part IV and V of the 2016 California Fire Code such as schools, hospitals, nursing homes, explosive plants, refineries, high-rise buildings, and other high life hazard or large fire potential occupancies.

The lead agency adopted alternative and comparable mitigation to replace MM M.1-1. With the implementation of the revised mitigation measure, impacts would continue to be less than significant. Long term funding for a fourth firefighter on each shift at Station 5 was secured through a Development Agreement associated with Tract Map 5996 for the Specific Plan Area.

Construction

Construction activities in the Specific Plan area, including the proposed Project, would increase the potential for accidental, on-site fires from such sources as the operation of mechanical equipment, use of flammable construction materials, and discarding of cigarettes. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures would be implemented during construction of the Specific Plan, including the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are less than significant for the following reasons:

- Construction impacts are temporary in nature and do not cause lasting effects.

Partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. If partial closures to streets surrounding the project site become necessary, then flagmen would be used to facilitate the traffic flow until construction is complete.

Operation

The Project would include adequate fire hydrants, access, signage, alarms, and addressable smoke detectors and would meet all requirements of the Uniform Fire Code which would minimize any potential impacts on Fire services. The Project plans have been preliminarily reviewed by the Fire Department and final plans would require Fire Department approval prior to the issuance of building permits. The proposed Project would be consistent with the findings of the Specific Plan EIR, which were found to be less than significant.

2) Would the project increase demand for law enforcement service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?

Construction

Construction sites can invite theft and vandalism. Developers typically take precautions to prevent trespassing through construction sites by installing temporary fencing around the construction site to keep out trespassers and discourage theft and damage. Although minor traffic delays may occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times would be minimal and temporary. Therefore, the construction-related impacts of the proposed Project site improvements to police protection services would be less than significant.

Operation

The proposed Project would introduce new employees to the area. Thus, an increase in the demand for police protection services is anticipated. While there is not a directly proportional relationship between increases in development and land use activity and increases in demand for police protection services, the number of request for assistance calls for police response to retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the buildout and occupancy of the Project. Based on experience with similar industrial parks and developments, anticipated problems in the Project area do not represent unusual law enforcement issues.

The Specific Plan EIR requires each development Project to implement MM M.2-1 and MM M.2-2 to reduce the potential for crime at and near each project site. With the implementation of these mitigation measures, the proposed Project will have a less than significant impact on police services, consistent with the findings of the Specific Plan EIR.

3) Would the project increase the use of existing park facilities such that substantial physical deterioration of the facilities would occur or be accelerated or that new or expanded park facilities would be needed to maintain acceptable service levels?

The response to this question is incorporated within the response to the next question.

4) Would the project increase the need for or use of existing library or other community facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Future operational impacts of the Specific Plan were found to have less than significant direct impacts on parks and libraries. The proposed Project is consistent with the development anticipated for the Sakioka Farms Business Park Specific Plan and analyzed in the Specific Plan EIR. Implementation of the Project would not create new impacts to parks and libraries beyond what was analyzed in the Specific Plan EIR.

Outdoor spaces would be provided as part of the project design. Furthermore, the project developer would be required to pay an in-lieu contribution fee in accordance with the standards and policies. Therefore, impacts related to community parks facilities would continue to be less than significant and no further technical studies or environmental documentation is required.

For the same reasons, the proposed project is not anticipated to increase the use of libraries or other community facilities in such a way as to add to deterioration of those facilities. The proposed Project would be consistent with the Specific Plan, and therefore, impacts would be less than significant, consistent with the Specific Plan EIR.

Specific Plan EIR Cumulative Impacts

Fire Services

The Specific Plan, in combination with the construction and operation of the related projects in Oxnard, will increase the demand for fire protection services. This need will be funded via existing development fee mechanisms. Each of the related projects would be individually subject to OFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the OFD and the City in order to adequately mitigate fire protection impacts.

In early 2020, the City determined that adding a fourth firefighter on each shift at the nearest fire station (Station 5) would provide the recommended response time to the Specific Plan area, negating the need to construct and staff a fire station within the Specific Plan. The lead agency has adopted alternative and comparable mitigation to replace MM M.1-1. With the implementation of the revised mitigation measure, cumulative impacts would continue to be less than significant.

Police Services

The related projects in Oxnard would increase the demand for police protection services in the Specific Plan area, but expanded police services would be funded via existing revenue to which the Specific Plan projects would contribute. Each of the Specific Plan projects would be subject to OPD review and required to comply with all applicable safety requirements of the OPD to address police protection

services. Significant impacts would be discussed and mitigated as part of the development and environmental review process. Therefore, cumulative impacts to police protection services would be less than significant.

Parks and Libraries

Future operational impacts of the Specific Plan were found to have less than significant cumulative impacts. Approval of the proposed Project would not cumulatively contribute to impacts to parks and libraries beyond what was analyzed in the Specific Plan EIR.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin and HAVE been addressed through the Development Agreement Negotiations

In early 2020, the City determined that adding a fourth firefighter on each shift at the nearest fire station (Station 5) would provide the recommended response time to the Specific Plan area, negating the need to construct and staff a fire station in the Specific Plan vicinity. The lead agency adopted alternative and comparable mitigation to replace MM M.1-1. Long term funding for a fourth firefighter on each shift at Station 5 was secured through the Development Agreement associated with Tract Map 5996 for the Specific Plan Area.

MM M.1-1 (Adaptive Replacement Measure): The parties agree that the formation of a Financing District that includes the obligation to pay for the annual cost of three firefighters (including benefits) is in lieu of the Specific Plan's obligation for developer to dedicate a 1.5-acre site near Rice Avenue and the easterly extension of Gonzales Road for a new fire station site and that such obligation fully mitigates the impact of the Project upon the City's fire services. This is provided, however, that the parties acknowledge and agree that the development of the property with residential uses and/or schools, hospitals, nursing homes, explosive plants, refineries, high-rise buildings and other high life hazard or large fire potential occupancies will, subject to the Fire Chief's determination, trigger additional obligations above and beyond the obligations imposed by this section based upon the specific uses added to the property or any portion thereof.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin and HAVE NOT been addressed through the Development Agreement Negotiations

Development Fees

During the plan check and permitting process the City Development Services Department would assess and determine project impact fees depending on each type of development under the Specific Plan. Development impact fees typically involve, but are not limited to, Planned Traffic Circulation System Facilities Fees (Traffic Impact); Planned Water Facilities Fee; Planned Wastewater Facilities Fee; Planned Drainage Facilities Fee; and Growth Requirement Capital Fee.

Mitigation Measure

MM M.2-1 During all construction activities, the project or subsequent developer shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging, are secured with temporary fences to prevent trespass.

MM M.2-2: The building and site design of subsequent developments under the Specific Plan program shall include crime deterrence and prevention features, building security systems, architectural design modifications, surveillance systems, and secure parking facilities. In addition, industrial businesses may be required to enroll into existing Oxnard Police crime prevention programs, depending on the nature of the business.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusion

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Public Services and Recreation not already evaluated and disclosed in the Specific Plan EIR. Neither new mitigation measures that were not adopted by the project proponent, due to project changes, changed circumstances, nor new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental evaluation related to Public Services and Recreation are not required.

3.15 Transportation & Circulation

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections) based on adopted City of Oxnard level of service standards?	Less than significant with mitigation	No	No
2) Exceed, either individually or cumulatively, a level of service standard established by the Ventura County Congestion Management Program for designated roads or highways?	Less than significant with mitigation	No	No
3) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Less than significant	No	No
4) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No impact	No	No
5) Result in inadequate emergency access?	No impact	No	No
6) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	This impact was not analyzed in the Specific Plan	No new or substantially more severe significant impacts and no new mitigation measures are required	No

	EIR		

The Specific Plan EIR found impacts to Transportation and Circulation to vary between no impact to less than significant impact with mitigation incorporated. The Sakioka Specific Plan EIR outlines 33 mitigation measures to reduce impacts to transportation and traffic. With implementation of the relevant portions of these mitigation measures, the impacts of Specific Plan implementation on transportation and traffic would be reduced to a less than significant level. These mitigation measures provide for numerous transportation improvements to be developed in synchronization with project development. The Specific Plan EIR determined that each project developed within the Specific Plan area would be required to either fully implement or pay a fair share contribution to the planned transportation improvements.

Setting

US 101 provides access to the Specific Plan area. The City's General Plan designates the intersection of Gonzales Road and Rice Avenue as the primary entry node to Oxnard. Access to the Specific Plan area is provided by a system of arterial highways including Rice Avenue, Del Norte Boulevard, and Gonzales Road.

The Specific Plan Circulation Plan requires an extension of Gonzales Road into and through the Specific Plan area. A second west to east major arterial (Sakioka Drive) will be approximately 1,200 feet to the south. Secondary roadways are to connect these west/east corridors (e.g., Gravity Circle and Synergy Circle). Additional internal project circulation will be provided by a network of public and private streets serving as access to individual parcels with the Specific Plan area and will be developed in conjunction with individual development projects as needed.

The master plan concept incorporates a public pedestrian walkway system. As a means of achieving a strong landscape image, landscape parkways and pedestrian walkways are required on both sides of the street and shall be provided in the street right-of-way adjacent to new development projects.

Specific Plan Circulation Policy 4.4.7, Trip Reduction Measures, will be included in future development projects, including the proposed Project, to implement the Ventura County Congestion Management Program. Trip reduction measures may include providing for bicycle parking facilities and an adequate number of vanpool and carpool parking spaces. Alternative transportation forms including bus service and future rail access, shall be investigated with each development project. Where feasible and appropriate, transit stops improvements, like bus pullouts, pads, and shelters, should be included in the plan. Future projects that employ 50 or more employees, such as the proposed Project, are required to provide basic transportation opportunities and options information to their employees through a Transportation Management Plan.

Specific Plan Circulation Policy 4.4.12, Circulation System Improvements, shall be master planned by phase to accommodate ultimate build-out of the Specific Plan. Onsite and offsite circulation improvement shall be completed prior to occupancy for development in each phase to provide appropriate vehicular, pedestrian, and bicycle circulation to each parcel. The 2012 EIR required that a

new traffic study analyzing current conditions be conducted with the first development of each identified phase. As the Project is identified for Phase One, a traffic study was conducted both for the Final Map and this Project.

The Specific Plan Phase I Project Focused Transportation Assessment (Focused Transportation Assessment) Report was prepared by Linscott, Law, & Greenspan (LLG), Engineers on March 30, 2020. The Project Bruin Traffic and Site Access Analysis was prepared by Associated Transportation Engineers (ATE) on April 2, 2020. These documents are used herein to support this discussion and incorporated by reference.

The Traffic and Site Access Analysis estimated the number of trips that would be generated by the proposed Project based on trip generation from three similar facilities. The Project-specific analysis of transportation and circulation impacts is discussed below.

Impact Discussion

1) Would the project cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections) based on adopted City of Oxnard level of service standards?

The Focused Transportation Assessment for Phase I of the Specific Plan determined that with planned improvements outlined in the Specific Plan EIR, including implementation of MM I-4 and I-5 and the construction of Streets A (Sakioka Drive), B (Gravity Circle), and C (Synergy Circle) within the project area, the nine study intersections studied in the assessment would operate at LOS C or better. These intersections include U.S. Highway 101 Northbound Ramps/Rice Avenue, U.S.

Highway 101 Northbound Ramps/Del Norte Boulevard, Rice Avenue/A Street, Rose Avenue/Camino Del Sol, U.S. Highway 101 Southbound Ramps/Rice Avenue, US-101 Southbound Ramps/Del Norte Avenue, Rose Avenue/Gonzales Road, and Del Norte Boulevard/ A Street. Therefore, it was determined that the project would not have a significant impact on the off-site intersections in the immediate project vicinity based on City of Oxnard impact thresholds. Additionally, the project would implement a TDM program as outlined in MM J-4, MM J-5, and MM J-6. A preliminary draft of the TDM is appended to the Traffic and Site Access Analysis. Implementation of a TDM program would further reduce impacts to a less than significant level.

Without mitigation, the project would generate 1,325 AM Peak hour trips, 1,325 PM peak-hour trips, and 4,756 ADT. This is 5,172 fewer daily trips but 164 more AM peak-hour trips and 1 more PM peak-hour trip than what was entitled for Phase I of the Specific Plan. Overall, with implementation of MM J-4, MM J-5, MM J-6, MM I-4, and I-5 and construction of Streets A, B, and C within the project area, impacts related to an increase in traffic would be less than significant. This is consistent with the findings of the Specific Plan EIR, and no additional mitigation is required.

2) Would the project exceed, either individually or cumulatively, an LOS standard established by the Ventura County Congestion Management Program (CMP) for designated roads or highways?

In terms of Ventura County General Plan consistency, the City of Oxnard and Ventura County have executed a "Reciprocal Traffic Mitigation Agreement" wherein the City and the County agree that a pro-rata share of the cost of mitigations will be collected by each agency for identified traffic impacts in the other jurisdiction. The project would be consistent with the Ventura County General Plan by complying with the terms of the "Reciprocal Traffic Mitigation Agreement" between the City of Oxnard and the County of Ventura approved on February 2, 1993. Payment of the traffic impact fee would mitigate the project impacts to County facilities outside the study-area.

Additionally, according to Ventura County's Congestion Management Program (CMP), the minimum acceptable standard for traffic operations is LOS E. However, so that local jurisdictions are not unfairly penalized for existing congestion, CMP locations currently operating in the LOS F range are considered acceptable (Ventura County Transportation Commission 2009).

The study-area intersections along Oxnard Boulevard, Rose Avenue, Rice Avenue, and Del Norte Boulevard are included in the County's CMP. As mentioned above, with implementation of planned improvements, including construction of Streets A, B, and C within the Specific Plan area and implementation of MM I-4 and I-5, all study area intersections would operate at LOS C or better. Therefore, the Project would not individually or cumulatively exceed the LOS standard established by the Ventura County CMP for designated roads or highways. Project impacts would be less than significant with mitigation incorporated, consistent with the findings of the Specific Plan EIR.

3) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The Project Bruin site is located just over 1 mile from Camarillo Airport, about 3 miles from Oxnard Airport, and over 7 miles from Naval Air Station Point Mugu. The site is not in the airport hazard zone for any of these facilities (Ventura County Airport Land Use Commission 2000). Thus, the proposed Project would have no impact with respect to air traffic patterns or airport-related safety risks. The TTM and Phase I site improvements would not result in any significant impacts not previously identified in the certified Specific Plan EIR. A finding of consistency with the EIR can be made and further review under CEQA is not warranted.

4) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The circulation plan for the Specific Plan includes an extension of Gonzales Road into and through the Specific Plan area. A second west to east major arterial (Sakioka Drive) will be approximately 1,200 feet to the south. Secondary roadways are to connect these west/east corridors (e.g., Gravity Circle and Synergy Circle).

The proposed project will take direct access from driveway connections to Sakioka Drive and Gravity Circle. The project driveway connections will be designed to City of Oxnard design standards and provide

adequate delivery truck and emergency vehicle access and none would involve design features such as sharp curves, dangerous intersections, or other traffic hazards. The site driveways and internal circulation system are not intended to facilitate incompatible activities such use of farm equipment. Given the forecasted project traffic volumes, the driveway intersections will operate acceptably with project traffic. Based on the above, a finding of consistency with the EIR can be made and this impact does not warrant further review under CEQA.

5) Would the project result in inadequate emergency access?

Project site access driveways would not create any design features that would inhibit emergency access to the site or the site vicinity. The planned improvements would generally enhance access to the area by completing components of the planned roadway system for the area. This would generally improve emergency access to the project site, as well as emergency evacuation from the area.

Proposed temporary construction activity would not alter travel patterns or otherwise alter emergency access to the site or site vicinity. Employee and truck trips associated with construction activity would temporarily increase traffic and associated congestion on the surrounding transportation system, but all construction activities would be subject to standard City traffic control requirements to ensure adequate emergency access. Truck haul trips would be expected to enter and leave the site via the Rice Avenue-US 101 or Del Norte Boulevard-US 101 interchanges, both of which are located immediately adjacent to the site and provide direct access. Thus, a finding of consistency with the EIR can be made and this impact does not warrant further review under CEQA.

Specific Plan EIR Cumulative Impacts

Cumulative development through 2030 has been planned for in the Oxnard Traffic Model. With the implementation of mitigation measures I-1 through I-34, the cumulative impacts of the Specific Plan to the study area would be reduced to a less than significant level. Implementation of the proposed Project would not change the cumulative impacts of the Specific Plan.

Impacts not Explicitly Analyzed in the Specific Plan EIR

In May 2017, the City adopted an updated CEQA Checklist to include threshold question six. Because the City's CEQA Consistency Evaluation was implemented after the adoption of the Specific Plan, impacts related to compliance with CEQA Guideline Section 15064.3 (i.e., analysis of vehicle miles traveled) were not explicitly discussed in the Specific Plan EIR.

6) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Per Senate Bill (SB) 743, the State CEQA Guidelines have been updated to incorporate vehicle miles traveled (VMT) as the primary metric for analyzing transportation impacts under CEQA. This update occurred subsequent to preparation of the 2012 EIR so VMT is not specifically addressed in the prior analysis.

The City of Oxnard has not adopted any specific significance thresholds related to VMT. The OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA, dated 2018, provides guidance on analyzing VMT impacts in light of SB 743. The Advisory recommends thresholds for a variety of land uses, but does not include any thresholds specific to "e-commerce fulfillment centers" such as that proposed. Given the lack of a specific threshold recommendation for this type of facility, the threshold for office projects is considered herein. The Advisory suggests an office project that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact.

CalEEMod results from the Air Quality and Greenhouse Gas Emissions Analysis Report, Project Bruin at The Sakioka Farms Business Park (prepared by First Carbon Solutions and dated April 6, 2020) estimate annual VMT for the project at 13,541,178 miles. Based on the estimated 2,172 employees expected to work at the facility (per the ATE Traffic and Site Access Study), this would equate to 6,234 miles per employee per year or about 17.1 miles per employee per day. This suggests an average commute distance of 8.55 miles (17.1/2). By comparison, the Southern California Association of Governments' 2016 Regional Transportation Plan/Sustainable Communities Strategy (SCAG's RTP/SCS) estimates the 2040 average work trip length at 15.5 miles. This suggests an average of 31 miles (15.5 x 2) per employee per day. The 17.1 miles per employee per day for the project would be about 45% lower than this average, which far exceeds the 15% reduction threshold that the OPR recommends for office projects.

In addition, by its nature, the proposed facility is specifically intended to provide for the efficient delivery of customer orders by, among other things, providing for the storage of goods in proximity to consumers and reducing the distance the goods need to be shipped to fill orders. This area of operations within Ventura and Santa Barbara counties is currently being served by several fulfilment centers in the Central Valley and Inland Empire. Currently, once an order is placed, it is fulfilled at one of the fulfillment centers mentioned above and then the package is trucked to a delivery station in this service area, which delivers the final package to the customer. With the location of the Project Bruin facility, the client will significantly reduce the trip length from the fulfillment center to the delivery stations.

Based on the above, the project is expected to generally reduce VMT on both a local and regional level by minimizing travel distances for both employee trips and goods shipment.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin and HAVE been addressed in Development Agreement Negotiations

The following mitigation measures are part of an adaptive management mitigation program. The traffic improvements I-1 through I-34, inclusive, are intended to maintain Level of Service C with the development of the Project unless accepted by the City Council based upon the traffic modeling completed in February 2010 for the Specific Plan Draft EIR. Subsequent traffic studies required by the Specific Plan as specific projects are identified may change the number and type of improvements based upon phasing of development, traffic counts, and future travel behavior. Adaptive management will allow consideration of such subsequent traffic studies in the implementation of the Transportation/Traffic mitigation measures. The February 2010 traffic modeling did not consider the

City's Intelligent Transportation Systems (ITS) project under construction in 2011[3]. Similar ITS projects have improved travel time and speed by 12 to 16 percent and decreased delay by 32 to 44 percent (City of Los Angeles 1994). As part of the adaptive measures, additional analysis shall take into account, when feasible, the ITS, future traffic counts, and updated trip generation data which may reduce, change, or make unnecessary the mitigation measures while still achieving the City's adopted Level of Service, unless modified by the City Council.

The action required by the implementation of the Transportation/Traffic mitigation measures shall be satisfied in full by:

1) The Developer's payment of applicable City and County traffic impact fees in the amount agreed to by the City, County and Developer, and/or
2) Fees negotiated by the June 2020 Development Agreement between the City of Oxnard and Sakioka Farms and AMS Craig LLC, or
3) Fees not covered by the Development agreement, but in the amount in effect at the time of issuance of a building permit, and;
4) Developers may also contribute additional funds towards the traffic improvements subject to reimbursement from the City in the form of credits against future City traffic impact fees or repayment by the City.

The following lists the original traffic mitigations identified in the 2012 EIR Mitigation Measures that will be addressed prior to completion of this Project. A significant change of use for the site could trigger additional traffic analysis to determine if any revised or additional mitigations would apply to future projects or phases of this project.

MM I-1: Rose Avenue & Gonzales Road: The Project developer shall pay applicable City and County traffic impact fees in the amount agreed to by the City and developer towards implementing improvements to the Rose Avenue & Gonzales Road intersection that adds a fourth westbound thru lane which will mitigate both Project and cumulative (2010 no Project) impacts.

MM I-2: Rose Avenue & Camino Del Sol: The Project developer shall pay applicable City and County traffic impact fees in the amount agreed to by the City and developer towards implementing improvements to the Rose Avenue & Camino Del Sol intersection that adds a third northbound thru lane by removing the existing northbound right-turn lane.

MM I-3: Rice Avenue & Fifth Street: The Project developer shall pay applicable City and County traffic impact fees in the amount agreed to by the City and developer towards implementing improvements to the Rice Avenue & Fifth Street intersection that adds a third southbound thru lane by removing the existing southbound right turn lane.

[3] As of the date of this report, fiber optic cable has been installed throughout the city in support of the ITS project; the system remains under construction.

MM I-4: Del Norte Boulevard & US 101 Northbound Ramps: The Project developer shall pay applicable City and County traffic impact fees in the amount agreed to by the City and developer towards providing signalization.

MM I-5: Del Norte Boulevard & US 101 Southbound Ramps: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to signalize and add a northbound right turn lane which will mitigate both Project and cumulative (2010 no Project) impacts.

MM I-34: 101 (Ventura) Freeway: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements that are, or are subsequently included, component(s) of the Oxnard Traffic Capital Improvement Program which: 1) extend and connect north- and south-bound US 101 exit and entrance ramps between Oxnard Blvd and Del Norte Blvd. and/or 2) extend Gonzales Road and/or Ventura Road to Central Avenue.

MM J-4: This is an adaptive management mitigation measure. A Project-wide Transportation Demand Management (TDM) program shall be prepared by a qualified consultant for review by the Development Services Director within one year of the recordation of the first Final Tract Map and implemented on a phase by phase basis thereafter. The TDM program shall incorporate best and commonly used trip-reduction incentives, programs, and practices found in TDMs of similar projects in terms of allowed uses, size, and transportation and transit service context. The TDM shall, to the maximum extent financially feasible or practical, be coordinated and consistent with Gold Coast Transit service planning, development and/or final adoption of a regional and/or Oxnard Sustainable Communities Strategy (under SB 375), and TDMs or similar efforts of surrounding businesses and organized business and commercial organizations, including but not limited to, the Camino Real Business Park; Proctor and Gamble; Riverpark (The Collections); The Esplanade; The Village; Oxnard Auto Center Dealers Associations; and the McGinnes Ranch, Northgate, and Seagate business parks. The TDM shall include an estimate of Project vehicular trips; a target reduction; a strategy and timeline to achieve the target; and one or more means of an independent sustainable funding program to administer, monitor, and routinely update the TDM program. At the discretion of the City Traffic Engineer based on applicable professional practice, documented and sustained TDM-attributable trip reductions shall be incorporated into future Project-related traffic studies and/or analyses for purposes of calculating traffic fees and/or modifying traffic-related mitigations. The TDM may be implemented on a phase-by-phase basis. This mitigation applieds to this project, and all future projects.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin and HAVE NOT been addressed through the Development Agreement Negotiations

No further mitigation measures are required.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

The following Specific Plan EIR mitigation measure reduces the impact associated with the impacts to Transportation and Circulation; however, these mitigation measures do not apply to this individual Project:

Assumed Phase 2

MM I-6: Ventura Road & Wooley Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Ventura Road & Wooley Road intersection that adds a third northbound thru lane and a third southbound thru lane which will mitigate both Project and cumulative (2010 no Project) impacts.

MM I-7: Oxnard Boulevard & Gonzales Road: The Project developer shall pay applicable City and County traffic impact fees toward improvements adding a third eastbound thru lane at the Oxnard Boulevard & Gonzales Road intersection.

MM I-8: Rose Avenue & Gonzales Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Gonzales Road intersection that adds a fourth southbound thru lane.

MM I-9: Rose Avenue & Fifth Street: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Fifth Street intersection that adds a second eastbound thru lane.

MM I-10: Rice Avenue & Fifth Street: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rice Avenue & Fifth Street intersection that adds a second westbound left turn lane which will mitigate both Project and cumulative (2010 no Project) impacts.

MM I-11: Rice Avenue & Channel Islands Boulevard: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rice Avenue & Channel Islands Boulevard intersection that changes the southbound de facto right turn lane to a free right turn lane.

MM I-12: Del Norte Boulevard & Ventura Freeway NB Ramps: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Del Norte Boulevard & Ventura Freeway NB Ramps intersection that adds a second northbound thru lane, adds a separate northbound left turn lane, adds a second southbound thru lane, adds a separate southbound right turn lane, and adds a separate westbound left turn lane.

MM I-13: Del Norte Boulevard & Ventura Freeway SB Ramps: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Del Norte Boulevard & Ventura Freeway SB Ramps intersection that adds a second northbound thru lane, adds a separate

northbound free-right turn lane, adds a second southbound thru lane, adds a separate southbound left turn lane, and adds a separate eastbound left turn lane.

MM I-14: Oxnard Boulevard & Vineyard Avenue: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Oxnard Boulevard & Vineyard Avenue intersection that adds a third northbound thru lane.

Assumed Phase 3

MM I-15: Oxnard Boulevard & Vineyard Avenue: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Oxnard Boulevard & Vineyard Avenue intersection that adds a fourth southbound thru lane.

MM I-16: Rose Avenue & Gonzales Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Gonzales Road intersection that adds a second westbound left turn lane.

MM I-17: Rose Avenue & Fifth Street: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Fifth Street intersection that adds a second westbound left turn lane.

MM I-18: Rice Avenue & Fifth Street: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rice Avenue & Fifth Street intersection that completes the grade separation / bypass which will mitigate both Project and cumulative (2020 no Project) impacts.

MM I-19: Rice Avenue & Wooley Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rice Avenue & Wooley Road intersection that adds a third northbound thru lane and a third southbound thru lane.

MM I-20: Ventura Road & Wooley Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Ventura Road & Wooley Road intersection that adds a second southbound left lane.

MM I-21: Rose Avenue & Camino Del Sol: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Camino Del Sol intersection that adds a second eastbound left lane and a second westbound left lane.

MM I-22: Del Norte Blvd & Fifth Street: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Del Norte Blvd & Fifth Street intersection that adds a second westbound thru lane.

Assumed Phase 4

MM I-23: Ventura Road & Gonzales Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Ventura Road & Gonzales Road

intersection that adds a second northbound left turn lane and a third northbound thru lane which will mitigate both Project and cumulative (2025 no Project) impacts.

MM I-24: Ventura Road & Wooley Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Ventura Road & Wooley Road intersection that adds a third eastbound thru lane and a third westbound thru lane which will mitigate both Project and cumulative (2025 no Project) impacts.

MM I-25: Rose Avenue & Camino Del Sol: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Camino Del Sol intersection that removes the southbound free right turn lane, adds a third southbound thru lane and adds an eastbound right turn lane which will mitigate both Project and cumulative (2025 no Project) impacts.

MM I-26: Rose Avenue & Fifth Street: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Fifth Street intersection that adds a southbound right turn lane or grade separation.

MM I-27: Rose Avenue & Channel Islands Boulevard: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Channel Islands Boulevard intersection that adds a third northbound thru lane.

MM I-28: Rose Avenue & Bard Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Bard Road intersection that adds a third northbound thru lane and a third southbound thru lane by removing the existing northbound and southbound right turn lanes.

MM I-29: Rice Avenue & Camino Del Sol: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rice Avenue & Camino Del Sol intersection that adds a second eastbound left turn lane which will mitigate both Project and cumulative (2025 no Project) impacts.

MM I-30: Rose Avenue & Wooley Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Wooley Road intersection that adds a third southbound thru lane.

MM I-31: Rose Avenue & Pleasant Valley Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the Rose Avenue & Pleasant Valley Road intersection that adds a third northbound thru lane and a third southbound thru lane by removing existing northbound and southbound right turn lanes.

MM I-32: SR-1/Rice NB & Pleasant Valley Road: The Project developer shall pay applicable City and County traffic impact fees toward implementing improvements to the SR- 1/Rice NB & Pleasant Valley Road intersection that adds a westbound right turn lane.

Buildout

MM I-33: Rice Avenue & Gonzales Road: The Project developer shall pay applicable City and County traffic impact fees and dedicate additional land to accommodate improvements to the Rice Avenue & Gonzales Road intersection to achieve LOS C, unless the City Council decides this mitigation is infeasible and accepts LOS D for this intersection with an accompanying Statement of Overriding Consideration.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Transportation and Circulation not already evaluated and disclosed in the Specific Plan EIR. No new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental documentation related to Transportation and Circulation are not required.

3.16 Utilities & Energy

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the Project:			
1) Need new or expanded water supply entitlements that are not anticipated in the current Urban Water Management Plan?	Less than significant with mitigation	No	No
2) [Require] additional wastewater conveyance or treatment capacity to serve project demand and existing commitments?	Less than significant	No	No
3) Generate solid waste that would exceed the permitted capacity of a landfill serving the City?	Less than significant	No	No
4) Conflict with federal, State, or local statutes or regulations related to solid waste?	Less than significant	No	No
5) Involve wasteful, inefficient, or unnecessary consumption of energy during project construction, operation, maintenance, and/or removal?	Less than significant	No	No
6) Require additional energy facilities, the provision of which may have a significant effect on the environment?	Less than significant	No	No
7) Be inconsistent with existing energy standards?	Less than significant	No	No
8) Preempt future energy development or future energy conservation, or inhibit the	Less than significant	No	No

future use of renewable energy or energy storage?			

The Specific Plan EIR found that impacts to wastewater, solid waste, and energy would be less than significant. The Specific Plan EIR found that impacts to water supply would be less than significant with mitigation incorporated. Accordingly, the Project will implement MM N-1 through N-13 from the Specific Plan EIR. The lead agency has determined that since the certification of the Specific Plan EIR, details of certain mitigation measures are no longer relevant for reducing Specific Plan impacts related to water supply entitlements. Adaptive, comparable mitigation is provided herein and would be included as a condition of project approval. The project proponent has agreed to the alternative mitigation provided herein and the implementation of the alternative mitigation measure would reduce the potential impact to water to less than significant levels, comparable to the findings of the Specific Plan EIR. The findings for the Specific Plan are consistent with the findings of the Specific Plan EIR.

Setting

Water

The City of Oxnard owns and operates its own municipal water supply system. In this capacity, the City is responsible for ensuring that potable water demand is met and that State and federal water quality standards are achieved. The City's water supply consists of a blend of local groundwater produced through the City's own groundwater wells, local groundwater that the City purchases from the United Water Conservation District (UWCD), and imported surface water purchased from the Calleguas Municipal Water District (CMWD). The CMWD is a member agency of the Metropolitan Water District (MWD) of Southern California, from which it purchases water from the State Water Project. The City's water system includes five blending stations where imported water is blended with local water. The City works to achieve a blending ratio of one part imported water to one part local water to balance quality and supply costs.

Water Supply Drought Management Plan

In 1999, MWD incorporated the water shortage contingency analysis required by the State as part of any urban water management plan into a separate, more detailed plan, called the Water Supply Drought Management Plan (WSDM). This plan provides policy guidance to manage the MWD's supplies and achieve the goals laid out in the agency's Integrated Resources Plan. The WSDM also "identifies the expected sequence of resource management actions that [the MWD] will execute during surpluses and shortages to minimize the probability of severe shortages and eliminate the possibility of extreme shortages and shortages allocations" (MWD 1999). The MWD's ten-year WSDM categorizes its ability to deliver water to its customers by distinguishing between surpluses, shortages, severe shortages, and extreme shortages. The WSDM integrates management actions taken during times of surplus and shortage and reflects MWD's approach that considers these actions are interrelated.

Water Conservation in Oxnard

The City of Oxnard's Groundwater Recovery Enhancement and Treatment (GREAT) Program is an innovative approach to maximize the benefits from local recycled and groundwater resources. An Advanced Water Purification Facility at the Oxnard Wastewater Treatment Plant processes wastewater and makes it available to agricultural users in the Oxnard Plain currently served by UCWD and other water districts (Western City Magazine 2006). The City receives groundwater credits from Fox Canyon Groundwater Management (FCGMA) and the program ensures over 20,000 acre feet per year (AFY) of additional water supply.

A detailed water demand model was developed as part of the 2005 UWMP and includes existing demand, demand from proposed build-out of the 2020 General Plan, unaccounted for water loss, potential increase in per-unit demand, and a contingency. The model also accounts for reductions in demand due to the increased use of recycled water and water conservation. This model was updated for build-out of the proposed 2030 General Plan Alternative B and to reflect recent changes in water supply and consumption, as accurately and as reasonably possible. The Specific Plan EIR indicates that these projections likely overestimate demand as the Oxnard City Council directed staff to require that all new projects defined as discretionary and not exempt from CEQA be water demand neutral to the City's water system, which would include projects developed under the Specific Plan (City of Oxnard 2011b). The Project proponent has agreed to the mitigation provided herein and the implementation of the mitigation measures would reduce the potential impact to water demand to less than significant levels, comparable to the findings of the Specific Plan EIR.

Wastewater

The City of Oxnard Public Works Wastewater Division (PWWD) provides sewer conveyance infrastructure and wastewater treatment services to the project area. The Specific Plan area is part of the Eastern Trunk Sewer area which combines and travels south along Rice Avenue and Pleasant Valley Road where it meets the Rose Avenue Trunk Sewer and into the Oxnard Wastewater Treatment Plant (OWWTP). The nearest sewer lines to the project site include an 18-inch vitrified clay pipe (VCP) gravity sewer line underneath Rice Avenue and a 21-inch VCP gravity sewer line underneath Del Norte Boulevard. Connected to the northern end of the gravity line in Del Norte Boulevard is a 10-inch force main that originates at the Nyeland Acres pump station located north of the site. Another 10-inch force main that originates east of the site is also connected to the northern end of the Del Norte gravity sewer line. Currently, there are no sewer lines located onsite.

Oxnard established a Wastewater Conveyance Fund and Wastewater Treatment Plant Fund to pay for operations, maintenance, and capital costs of the wastewater collection system and wastewater treatment. In addition to these funds, Oxnard utilizes State and Federal grants to pay for a portion of the recent OWWTP expansion. Oxnard also collects sewer connection fees, and/or requires developers to build improvements to expand the wastewater collection system to service new customers (City of Oxnard 2006).

Solid Waste

The City of Oxnard Solid Waste Division Municipal Haulers provides solid waste management, and currently collects, separates, and disposes in excess of 200,000 tons of refuse annually through the City-owned but privately operated Del Norte Regional Recycling and Transfer Station (City of Oxnard 2020c). Del Norte Regional Recycling and Transfer Station includes waste transfer from the City, permitted haulers, and self-haulers throughout the region, and materials recovery, which is responsible for diverting material from the waste stream to prevent marketable recyclable material and divertable material from entering the landfill. Del Norte also includes the buyback center, responsible for accepting and dispensing payments to customers that redeem California Redemption Value material such as aluminum cans, plastic beverage containers and glass, and the Recyclable Household Hazardous Waste Center, which is responsible for accepting and recycling material from Oxnard residents that drop-off antifreeze, batteries, used motor oil, water-based paint and electronic devices.

The California Integrated Waste Management Act of 1989 (AB 939) requires that local governments ensure that solid wastes are diverted from disposal. In addition, the CalGreen building standards mandate that 65% of construction and demolition materials be reused, recycled, composted or otherwise diverted from landfill disposal.

Solid waste that cannot be recycled is disposed of at the Toland Road Landfill east of Santa Paula and the Simi Valley Landfill. The Toland Road Landfill is a Class II municipal landfill operated by the Ventura County Sanitation District. It has a permitted capacity of 1,500 tpd and accepts an average of 1,200 to 1,400 tpd, of which 200 to 240 tpd come from Oxnard. The projected closure date for the Toland Road Landfill is in 2027. The Simi Valley Landfill is a private facility operated by Waste Management, Inc. It has a capacity of 3,000 tpd and currently accepts an average of 2,600 tpd, of which about 800 to 960 tpd come from Oxnard. The projected closure date for the Simi Valley Landfill is between 2022 and 2034.

Energy Consumption

The State Building Energy Efficiency Standards Energy regulates energy consumption by new buildings in California, including electricity and natural gas. These standards are embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided that these standards meet or exceed those provided in Title 24 guidelines.

Natural Gas

Southern California Gas Company (SoCal Gas) is the primary natural gas provider for Oxnard. SoCal Gas serves the Specific Plan area through existing subterranean gas mains in the adjoining dedicated streets. Natural gas service is provided in accordance with SoCal Gas's policies and extension rules on file with the California Public Utilities Commission at the time contractual agreements are made.

California produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the state, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. The availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SoCal Gas is under the jurisdiction of the California PUC, but can be affected by the actions of federal regulatory agencies. Should these agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

Electricity

The City of Oxnard receives electricity from Southern California Edison (SCE). Facilities and infrastructure providing service to the project site include transmission, distribution, and communication lines. SCE provides electricity service to central, coastal and southern California in 180 cities over 50,000 square miles in 15 counties. SCE serves more than 15 million people, 5,000 large businesses, and 280,000 small businesses. The SCE power mix in 2010 (at the time of the Specific Plan EIR) included 6% large hydroelectric, 7% coal, 18% renewable combined (e.g., biomass, geothermal, small hydro, solar, wind), 19% nuclear, 37% natural gas and 13% unspecified sources of power. The SCE power mix in 2018 included 0% coal, 4% large hydroelectric, 6% nuclear, 17% natural gas, 36% renewable combined (e.g., biomass, geothermal, small hydro, solar, wind), and 37% unspecified sources of power.

Impact Discussion

1) Would the project need new or expanded water supply entitlements that are not anticipated in the current Urban Water Management Plan?

Development of the Specific Plan is part of the overall planned water demand increase for Oxnard. The Specific Plan EIR found that projected water demand for Oxnard in 2030 with complete build-out of the Specific Plan, other future projects, and ambient growth would be approximately 40,980 AFY (an increase of 13,965 or 33 percent above existing demand in 2007). Thus, the Specific Plan Area requirement of 1,025 AFY represents 2.4 percent of the projected demand and 7.4 percent of the projected increase from 2007 to 2030 (City of Oxnard 2011b: IV.N-30).

The Preliminary Engineering Water Study (Kimley Horn 2020a) calculated the anticipated water demand of Project Bruin based upon the project's peak domestic water demand identified on the prototypical plans and specifications. It was determined that the building's projected peak domestic water demand would be 250 gallons per minute (GPM), which correlates with monthly and annual water usage (demand) of 1.2 million gallons (MG) and 44 acre-feet per year (AFY), respectively. In contrast, the Water Supply Assessment (WSA) prepared for the Sakioka Farms Specific Plan determined that water demand for all light industrial within the Specific Plan area would be 790 AFY for 250.5 acres of light industrial, which correlates with approximately 204 AFY for 64.65 acres of light industrial such as would be implemented for Project Bruin. Therefore, the Preliminary Engineering Water Study concluded that Project Bruin's water demand would be 160 AFY less than calculated in the WSA for the Sakioka Farms Specific Plan for the equivalent development of light industrial buildings. Water demand mitigation

measures developed under the Specific Plan WSA remain applicable to Project Bruin and would be implemented for the water demand rate calculated in the Preliminary Engineering Water Study of 44 AFY. Table 13 details the Sakioka Farms Specific Plan Water Supply assumptions, the projected Water Demand for the proposed Project, and the remaining water supply presumably available for future development in the business park.

Table 13. Sakioka Farms Business Park Water Demand

	Acre Feet per Year
Assumed Total Water Demand for Light Industrial Development	790
Project Bruin	44
Remaining Water Supply for Light Industrial Development	**746**

According to the Preliminary Engineering Water Study, the proposed Project will have a water demand less than the water demand included and evaluated within the Specific Plan EIR and the conclusions outlined in the EIR are valid for the proposed project. In addition, the Project would implement relevant mitigation measures from the Specific Plan EIR. Therefore, impacts would be less than significant, consistent with the findings of the Specific Plan EIR.

2) Would additional wastewater conveyance or treatment capacity be required to serve project demand and existing commitments?

As indicated in Table IV.N-4 of the Specific Plan EIR, the Specific Plan is estimated to generate a total of up to approximately 860 AFY of wastewater. This translates to up to 767,759 gpd. New sewer facilities constructed onsite will have to be connected to both the Rice Avenue and Del Norte Boulevard existing sewer lines. The eventual development of the Project site was anticipated when the Northeast Industrial Area infrastructure was planned.

Since there are existing sewer lines adjacent to and nearby the project site, with sufficient capacity to handle the flows from the Specific Plan, no offsite sewer line improvements are anticipated, other than the Specific Plan's connection. The OWWTP has a remaining capacity of 11.7 million gpd and the Specific Plan's flows of up to 767,759 gpd can be accommodated. At most, the project would utilize 6.5 percent of the OWWTP's remaining capacity. The Specific Plan would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Furthermore, all industries proposing to connect to or discharge into the local sewer system shall first obtain the appropriate permit from the City of Oxnard Public Works Department, Wastewater Division. Sewer plans shall be approved by the City Engineer and the Oxnard Wastewater Division.

In addition, the mitigation measures required for potable water supply would further reduce the amount of wastewater generated by the entire Specific Plan. Therefore, the impact of the entire Specific Plan on sewer systems would be less than significant. The proposed Project does not change this finding.

The Specific Plan EIR found impacts related to wastewater to be less than significant. Project Bruin would implement waste management and recycling programs in order to decrease wastewater and solid waste on site. Additionally, the Project would connect to the business park sewer system and would not require additional conveyance or treatment capacity beyond what was projected in the Specific Plan EIR. Therefore, impacts related to wastewater would be less than significant, consistent with the findings of the Specific Plan EIR.

3) Would the project generate solid waste that would exceed the permitted capacity of a landfill serving the City?

Construction

Construction activities generate a variety of waste, with most recyclables being wood waste, drywall, metal, paper, and cardboard. Construction of the Specific Plan projects could generate up to 33,084,450 pounds of solid waste over the construction period. Recycling of construction-related waste materials in compliance with AB 939 and City recycling programs would substantially reduce this waste stream that would otherwise go to a landfill. The City requires developers to prepare a Solid Waste Management and Recycling Plan prior to the issuance of building permits that identifies the materials to be recycled and the management methods to be implemented during construction. Therefore, using a conservative assumption of 50 percent recycling rate of construction waste, approximately 16,542,225 pounds (8,271 tons) of construction waste could be disposed of in the landfills.[4]

The Toland Road Landfill has capacity for between 100 and 300 tons of additional solid waste per day and the Simi Valley landfill has capacity for about 400 additional tpd. As such, both landfills would have adequate capacity to accommodate the construction waste of 8,271 tons generated by Specific Plan build-out over a construction period of several years. Therefore, a less than significant impact associated with construction waste would occur. The proposed Project does not change this finding and will adhere to policy regulations.

Operation

Operation of all the Specific Plan projects would result in ongoing generation of solid waste. Over the long term, all the Specific Plan projects would be expected to generate approximately 141,264 pounds per day. Solid waste generation rates are per employee for commercial, office, and industrial land usage. Therefore, the size indicates the numbers of employees, provided in Population and Housing, of the Draft EIR.

All Specific Plan projects are required to participate in all applicable City recycling programs. The City currently requires the owners of commercial, office, and industrial buildings to prepare an Occupancy Recycling Plan that outlines the recycling efforts that will be undertaken over the permitted occupancy of the business. The City Solid Waste Division also requires annual reports on what is actually recycled during occupancy. Using a diversion average of 69 percent, the Specific Plan would generate

[4] (33,084,450 pounds of solid waste generated by the Specific Plan)/2 per AB 939.

approximately 45,561 pounds (23 tons) or 43,792 pounds (22 tons) of solid waste per day (with residential uses or without residential uses, respectively) that would be disposed of in local landfills.

The Project would generate less solid waste than the Sakioka Farms Business Park as a whole, as it is only one component of the Business Park. Therefore, the project would not exceed the permitted capacity to the landfill serving the City or conflict with federal, State, or local statutes or regulations related to solid waste. Impacts would be less than significant, and would be consistent with the findings of the Specific Plan EIR.

4) Would the project conflict with federal, State, or local statutes or regulations related to solid waste?

The response to this question is incorporated within the response to question three.

5) Would the project involve wasteful, inefficient, or unnecessary consumption of energy during project construction, operation, maintenance, and/or removal?

The response to this question is incorporated within the response to question eight.

6) Would the project require additional energy facilities, the provision of which may have a significant effect on the environment?

The response to this question is incorporated within the response to question eight.

7) Would the project be inconsistent with existing energy standards?

The response to this question is incorporated within the response to question eight.

8) Would the project preempt future energy development or future energy conservation, or inhibit the future use of renewable energy or energy storage?

Development of the Specific Plan would result in an increase in natural gas consumption. However, SoCal Gas would be able to provide the increase in its portion of the volume of natural gas anticipated from development of the Specific Plan. As indicated in Table IV.N-9 of the Specific Plan EIR, the Specific Plan is estimated to consume up to 776,082 cubic feet (cf) of natural gas per day. SoCal Gas operates various medium and high pressure gas mains within the limits of the Specific Plan and will accommodate the natural gas needs from current supplies. Natural gas will be provided to the Specific Plan area through existing pressure mains in the adjoining streets.

Project Bruin would be responsible for paying any connection costs. Natural gas connection to the Project would not entail expansion of distribution infrastructure nor capacity enhancing alterations to existing facilities. Therefore, there would be a less than significant impact on natural gas supply systems, consistent with the Specific Plan EIR.

The Specific Plan is under agricultural land use and has had minimal need for electricity. The proposed Project would result in increased electricity consumption, but SCE has indicated that the electrical loads of the entire Specific Plan are within the parameters of projected load growth. As indicated in Table IV.N-10 of the Specific Plan EIR, the Specific Plan is estimated to consume up to a total of 264,999

kilowatt-hours of electricity per day at build-out. The proposed Project would consume less electricity than the Sakioka Farms Business Park as a whole, as it is only one component of the Business Park.

Title 24 of the California Code of Regulations establishes energy conservation standards for new construction, including residential and non-residential buildings. The Specific Plan would meet or exceed Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. With modern energy efficient construction materials and compliance with Title 24 standards, the Project would be consistent with the State's energy conservation standards and, therefore, would not conflict with adopted energy conservation plans. Furthermore, as described in Section 1.4 Project Description, the Project has been designed with many energy-reducing measures beyond the requirements of Title 24.

The proposed Project would be required to comply with Title 24, which establishes energy conservation standards for new construction, and would contribute minimally to the total assumed energy consumption for the Specific Plan area. Therefore, there would be a less than significant impact on electrical supply systems, in line with the Specific Plan EIR.

Specific Plan EIR Cumulative Impacts

Water

Implementation of Specific Plan projects with water neutral mitigation would not result in a cumulative impact on water supply or water infrastructure. There is the potential that due to uncertainties, the City could face water shortages. Therefore, the following measures are available and shall be implemented by the City and future developers, as necessary, to avoid or reduce the risk of potential future water shortages. While many of these measures are programmatic in nature and go beyond what can be accomplished at the project level, the Project developers and subsequent developers shall be required to support the City with implementation of the following measures, as applicable (City of Oxnard 2011b). These measures help to illustrate the flexibility in programs that the City has to avoid environmental impacts associated with future water supply and demand issues.

- The City shall continue to maximize its reliance on the M&I Supplemental Water Supply Program.
- The City has the option to pump additional groundwater from City wells above their allocation. However, this may result in additional surcharges from the GMA.
- The supply and demand comparison tables presented earlier are predicated on the City utilizing its full purchase order entitlement of CMWD water, less the PHWA water use and reservation as discussed above. However, in 2007 PHWA only used 2,220 AFY of its 3,262.5 AFY of reservation. Thus, the City could potentially purchase an additional 1,040 AFY of CMWD in times of need.
- Obtain City Council approval for use of the allocation and credits associated with UWCD's acquisition of the Ferro Property.
- The City also has options of purchasing unused O-H water from other water purveyors.
- Plan for the first expansion of the GREAT Program to be an additional 5.2 MGD (to 11.45 MGD).

- The City should plan for the second expansion of the GREAT Program to be an additional 5.0 MGD (to 16.45 MGD). Before designing the second expansion, in particular, the demand and surplus projections should be revisited. The City could also implement additional temporary water demand measures for periods when supply is not sufficient to meet demand as outlined in City Ordinance No. 2729, City of Oxnard Water Conservation and Water Shortage Response Ordinance.
- The City shall monitor the pace of new development as it relates to the phasing and implementation of new water supply systems and changing legal, environmental, technological, and social conditions. If it becomes apparent that the anticipated water supply systems are not keeping pace with development or should unanticipated events occur that would cause such new development to adversely impact local water supplies, the City shall curtail or limit the issuance of building permits until such time that a water supply can be assured.

Each project shall be required to pay a fair share contribution to all programs, such as the City's fee program, that are in place to fund the GREAT Program and to facilitate implementation of new water supplies for the City. In addition, all projects shall be required to comply with standard water conservation requirements of the City, State, and Uniform Building Code. These include the use of low-flush toilets and urinals, compliance with statewide efficiency standards for shower heads and faucets, and insulation of pipes to reduce water used before hot water reaches equipment or fixtures. CEQA also requires that an EIR disclose the environmental effects of potential mitigation measures such as the implementation of the City's GREAT Program. The 2030 General Plan Program EIR is hereby incorporated by reference for the cumulative analysis of water impacts. The proposed Project would not change this finding.

Wastewater

At the time the Specific Plan EIR was certified, the residential, commercial, and industrial projects that were proposed, recently approved, or under construction in the City had an estimated wastewater generation of approximately 1,176,835 gpd. This amount was further divided by the land usage associated with each type of project as listed below:

- Residential projects with 5,633 dwelling units generate 901,280 gpd
- Commercial projects with 2,455,726 sf generate 196,457 gpd
- Industrial related projects with 988,726 sf and generate 79,098 gpd

Build-out of cumulative projects in Oxnard will continue to increase demands on the OWTP. City general fund monies and wastewater treatment connection fees provide revenue for any necessary replacement or improvements to the OWTP. Cumulative development would also increase the demand on the wastewater conveyance system. Funding for increases in sewer capacity and other improvements come from a combination of connection fees paid by project developers and general fund monies. The wastewater conveyance connection fee is required so that necessary expansions to the sewage collection system can accommodate new development throughout Oxnard.

Based on this information, cumulative impacts relating to the collection and treatment of wastewater would be less than significant. The proposed Project would not change this finding.

Solid Waste

The Specific Plan EIR provided a list of residential, commercial, and industrial projects proposed, recently approved, or under construction in the City in its Appendix C. The estimated solid waste generation by the related projects would be approximately 131,937 pounds per day (66 tpd). This was divided further by the land usage associated with each type of related project, the estimates for which follow:

- Residential projects generate 68,980 lbs/day
- Commercial projects generate 57,074 lbs/day
- Industrial projects generate 5,883 lbs/day

The commercial and industrial sections were generated based on numbers of employees estimated in the Population and Housing section of the Specific Plan EIR. Cumulative impacts were found to be less than significant in the Specific Plan EIR. The proposed Project would not change this finding.

Energy

Natural Gas

The Specific Plan EIR provided a list of residential, commercial, and industrial projects proposed, recently approved, or under construction in the City in its Appendix C. Estimated natural gas consumption by the related projects would be approximately 1,133,456 cf/day. This is further divided by the land usage associated with each type of related project as follows:

- Residential related projects consume 804,974 cf/day
- Commercial related projects consume 231,587 cf/day
- Industrial related projects consume 96,895 cf/day

The increase in natural gas consumption over existing levels does not constitute a significant environmental impact due to the following reasons: All of the related projects would be required to meet or exceed Title 24 of the CCR, which establishes energy conservation standards for new construction and would be consistent with the State's energy conservation standards and, therefore, would not conflict with adopted energy conservation plans. In addition, each related project would be in contact with SoCal Gas to aid in future planning and development of infrastructure. Cumulative impacts related to natural gas service would be addressed through this process. As a result, cumulative natural gas impacts are not expected to be significant. The proposed Project would not change this finding.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

No mitigation measures are required for impacts to wastewater, solid waste, or energy. The following mitigation measures apply to impacts to water for this individual Project. Mitigation measures MM N-1,N-2, N-12.3-12.5 and N-13 are adaptive replacement mitigations adopted in May 2020 to provide in-lieu sustainability measures with equivalent or improved efficacy than the original 2012 EIR measures,

reflecting the city's updated policy to develop the GREAT program as more effective at improving water supply than the previous recycled water program in place when the 2012 EIR was adopted.

MM N-1 (Adaptive Replacement Measure): The on-site domestic water system shall include the following:

- A public pipeline system which feeds into separate water meters for each ownership.
- A separate water meter (1) for the common landscape areas that would be connected to the future recycled water system.
- All domestic water pipelines shall adhere to the Division of Occupational Health and Safety (DOHS) requirements for separation between water and recycled water/wastewater pipelines.
- The Project developer shall be responsible for payment of capital improvement/connection fees, including all related "installation fees."

The Project developer shall provide the City any approvals necessary to dedicate to the City all FCGMA allocation associated with the Project site, on a phase-by-phase basis and upon the conversion of land from agricultural to urban uses.

MM N-2 (Adaptive Replacement Measure): This is an adaptive management mitigation measure. The Project developer shall provide a water system that serves all practical irrigated areas and which is: (1) constructed per the City's GREAT Program, (2) irrigated at night, and (3) properly signed once the system is fully operational.

The Project developer shall be responsible for appropriate Sakioka Farms Specific Plan Covenants, Conditions and Restrictions (CC&Rs) covering the water use for proper disclosures. The Project developer shall provide the CIty any approvals necessary to dedicate to the CIty all FCGMA allocation associated with the Project site, on a phase-by-phase basis and upon the conversion of land from agricultural to urban uses.

MM N-3: This is an adaptive management mitigation measure. The project developer shall, to the extent feasible, incorporate exterior water conservation features, as recommended by the State Department of Water Resources at the time of adoption or in common practice in the future, into the project. These shall include, but are not limited to:

- Landscaping of common areas with low water-using plants,
- Minimizing the use of turf by limiting it to lawn dependent uses, and
- Wherever turf is used, installing warm season grasses.

MM N-4: This is an adaptive management mitigation measure. The project developer shall, to the extent feasible, use reclaimed water for irrigation of landscaping and other uses if or when such water is available at the project site.

MM N-5: The project developer shall predominantly use vegetation that requires minimal irrigation (i.e., drought tolerant plant species) in all site landscaping where feasible for new plantings.

MM N-7: The use of a 14-inch line would be feasible and should only be connected to mainlines of 14-inches or larger.

MM N-9: The Project developer shall ensure that the landscape irrigation system be designed, installed, and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize overspray onto walkways and streets.

MM N-10: The project developer shall, to the extent feasible, install a "smart sprinkler" system to provide irrigation for the landscaped areas. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be automatically adjusted by a state-of-the-art system that relies on local weather forecasts.

MM N-11: The project developer shall, to extent fasile, install a "smart sprinkler" system to provide irrigation for the landscaped areas irrigation run times for all zones shall be adjusted seasonally , reducing water times and frequency in the cooler months (fall, winter, spring) Sprinkler timer run times shall be automatically adjusted by a state-of-the art system that relies on local weather forecasts.

MM N-12: This is an adaptive management mitigation measure. The project's annual water supply deficit of 330 acre feet was estimated using 2010 water use estimates for the theoretical build-out of the entire project. Actual water demand over the build-out of the project is likely to change as actual development and uses occur and changing water consumption. Subsequent water demand/supply analyses required by subsequent CEQA review may change water supply needs relative to the City's future water supply. The Draft 2010 Urban Water Management Plan (UWMP) incorporates the project's water demand as proposed. Should subsequent project development incur water demand in excess of that anticipated by the adopted 2010 UWMP and/or the City's water supplies are reduced below those anticipated by the adopted 2010 UWMP, the project shall, to the extent feasible, implement one or more, but not limited to, the following adaptive measures to remain water neutral to the City's available and projected supply at the time of subsequent project approvals that involve a Negative Declaration, Mitigated Negative Declaration, or Subsequent EIR:

MM N-12.1: The Project developer shall provide to the City additional water rights of at least the shortage amount.

MM N-12.2: The Project developer shall provide to the City water supplies equal to the shortage amount until City supply is adequate.

MM N-12.3(Adaptive Replacement Measure): The Project developer shall provide to the City permanent quantified water offsets in the form of water conservation measures that meet best practices and current City policies as determined at the time of application.

MM N-12.4 (Adaptive Replacement Measure): The Project developer shall provide to the City financial contributions towards City programs which generate in-City water conservation or conveyance. Dedication of water rights, purchase of City water, and other contributions to water conservation shall be considered at time of application and determined as part of Planning entitlement.

MM N-12.5: The Project developer shall participate in other similar programs which cumulatively result in an adequate water supply contribution.

MM N-13 (Adaptive Replacement Measure): The Project developer(s) of proposed and future uses in the Specific Plan area are expected to meet the water usage expectations of the 2012 EIR. Projects that demonstrate water usage commensurate, or less, than what was assumed under the 2012 EIR are not required to make additional off-sets. Proposed land uses that require water usage that exceeds the established 2012 EIR thresholds will require water demand mitigation to be determined on a project by project basis.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

The following Specific Plan EIR mitigation measure reduces the impact associated with the impacts to Utilities and Energy; however, these mitigation measures do not apply to this individual Project:

MM N-6: The future water system shall be designed in a loop configuration with connections to the existing 16-inch water line on Del Norte Boulevard.

MM N-8: Rice Avenue is planned to become a state highway; therefore, no new utilities shall be installed along this roadway.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe impacts on Utilities and Energy not already evaluated and disclosed in the Specific Plan EIR. No new mitigation measures not adopted by the project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental documentation related to Utilities and Energy are not required.

3.17 Wildfire

Environmental Evaluation Criteria	Specific Plan EIR Significance Conclusions	Would the Project have effects not evaluated in the Specific Plan EIR because it would: (1) cause new or substantially more severe significant impacts, or (2) require new mitigation measures not adopted by the Project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified? (CEQA Guidelines §§ 15168(c)(1) & (2) and 15162.)	Additional Environmental Review Required (Y/N)?
Would the project:			
1) Substantially impair an adopted emergency response plan or emergency evacuation plan?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No
2) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No
3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No
4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	This impact was not analyzed in the Specific Plan EIR	No new or substantially more severe significant impacts and no new mitigation measures are required	No

In February 2019, the CEQA Checklist was updated to include questions related to fire hazard impacts for projects located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Fire hazard significance thresholds were not included in the City's CEQA Guidelines released in May 2017. Because the State CEQA Guidelines for wildfires were implemented after the adoption of the Specific Plan, fire hazard impacts were not explicitly discussed in the Specific Plan EIR. Other discussions

related to fire response and potential hazards in the Specific Plan area are included in Section G Hazards and Hazardous Materials and Section M.1 Public Services of the Specific Plan EIR. The analysis below analyzes the project pursuant to the 2019 CEQA Guidelines in assessing the risk of wildfire.

Impact Discussion

1) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The Project is designed to accommodate the most current fire regulations for hydrant spacing and fire access and is part of the underlying Development Agreement that funds additional fire personnel for the area. The internal site circulation system would be designed to meet all necessary City emergency access standards. Approval of the proposed Project would not impair implementation of or physically interfere with an adopted emergency plan or emergency evacuation. There would be no impact.

2) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Specific Plan area is flat and in an urban area that is not forested. The Project would not contribute to or be subject to an increased risk of large wildfires that would expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire. Impacts would be less than significant.

3) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The Specific Plan area, including the Project site, is not in or near a designated very high fire hazard severity zone of local, state, or federal responsibility according to the California Department of Forestry and Fire Protection (CAL FIRE), Fire and Resource Assessment Program, Very High Fire Hazard Severity Zones Map for Ventura County (CAL FIRE 2007). Additionally, Oxnard is not a community at risk, which means development in the city is not built among lands prone to wildland fire (Ojai Valley Fire Safe Council 2010). Implementation of the proposed Project would not exacerbate fire risk in the area. There would be no impact.

4) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Specific Plan area and vicinity is flat and not located on soil that is unstable or that would become unstable as a result of the project and potentially result in a landslide. The Project would not expose people or structures to significant risks of downslope or downstream flooding or landslides. Furthermore, the Project site would not be subject to unstable slopes except where temporary slopes are created during excavations for foundations and utility trenches. Any temporary slopes created by construction would be stabilized by appropriate temporary measures during construction, in compliance

with current building codes and U.S. Occupational Health and Safety Administration standards, thereby reducing the potential impact to a less than significant level.

Specific Plan EIR Mitigation Measures that ARE APPLICABLE to Project Bruin

No mitigation measures are required.

Remaining Specific Plan EIR Mitigation Measures that ARE NOT APPLICABLE to Project Bruin But May Apply to Future Phases and/or Development Projects

There are no mitigation measures that would apply only to future phases and/or development projects.

Conclusions

Development of a light industrial building in Area 5 was anticipated as part of the Specific Plan EIR. Implementation of the Project would not result in any new or more severe significant impacts related to Wildfire not already evaluated and disclosed in the Specific Plan EIR. No new mitigation measures not adopted by the project proponent, due to project changes, changed circumstances, or new information that was not known and could not have been known with the exercise of reasonable diligence at the time the Specific Plan EIR was certified are required. Therefore, further technical studies or environmental documentation related to Wildfire risk are not required.

Section 4. Environmental Conclusion

In accordance with CEQA Guidelines sections 15168 and 15162 and as set forth in this Consistency Evaluation, Project Bruin at the Sakioka Farms Business Park would not have effects that were not examined in the Specific Plan FEIR because:

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken, that will require major revisions to the FEIR, due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no new information of substantial importance as that term is used in CEQA Guideline Section 15162(a)(3).
- The project proponent does not refuse to implement any mitigation measures that were previously infeasible but are now feasible, or any other mitigation measures, including mitigation measures considerably different from those in the FEIR, that would be necessary to substantially reduce significant environmental impacts.
- The project proponent is required to comply with the applicable mitigation measures and regulatory programs identified in the FEIR and the Adaptive Management Mitigation Monitoring and Reporting Program dated May 2020.

Pursuant to CEQA Guidelines Section 15168(c)(4)-(5) and (e), and as demonstrated by the substantial evidence contained in the Consistency Evaluation and the associated administrative record, Project Bruin at the Sakioka Farms Business Park is covered by and within the scope of the program approved by the FEIR; the FEIR adequately describes the project for purposes of CEQA; and no further environmental documentation is required. Furthemore, Project Bruin at the Sakioka Farms Business Park has no significant impacts to CEQA topics adopted by the City in 2017, and new mitigation measures are not required to address these topics.

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