Addendum No. 2 to the
RiverPark Project
Final Environmental Impact Report

State Clearinghouse No. 2000051046

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1.0 INTRODUCTION

OVERVIEW

This document is the second Addendum to the Certified Final Environmental Impact Report (FEIR) for the RiverPark Project. This Addendum to the Certified FEIR addresses a change in the grading operation.

Purpose of this Addendum

When a FEIR has been certified for a project, the California Environmental Quality Act (CEQA) provides for the update of the information in the Certified FEIR to address changes to a project or changes to the circumstances under which a project will occur. An Addendum to a previously Certified FEIR may be prepared if changes or additions to the FEIR are needed, but none of the conditions calling for a Subsequent EIR as defined in the CEQA *Guidelines* have occurred. Specifically, Section 15162 of the CEQA *Guidelines* provides that where the Lead Agency determines that neither project changes, changed circumstances, nor new information requires the preparation and circulation of a Subsequent or Supplemental EIR, the Lead Agency may prepare an Addendum to an EIR. CEQA *Guidelines* Section 15164 states that the purpose of an Addendum is to provide a way of making minor changes or additions to an EIR. Circulation of an Addendum for public review is not required.

The RiverPark Project, as described and analyzed in the Certified RiverPark FEIR included a conceptual grading plan for the entire 701-acre site. The conceptual grading master plan identified a total of 10 million cubic yards of cut and fill of earth materials on the project site. It was anticipated that the grading operations would be a balanced operation, thus no import or export of earth materials was anticipated to be needed based on the soil characteristics identified in the geotechnical report prepared for the project site. Since the completion of the Certified FEIR, the project applicant has begun the mass grading of the project site. As a result of the commencement of the initial mass grading of the site, the applicant has identified the need to import fill soils to the project site as a result of higher than anticipated soil compression. Additionally, mitigation measures identified in the Certified EIR have necessitated deeper soil removal depths and thus have generated the need to import soils to adequately balance the site. In response to this discovery, the applicant is proposing to import approximately 500,000 to 600,000 cubic yards of soil to balance the project site.

This Addendum to the Certified FEIR has been prepared because: (1) no substantial changes are proposed in the project which will require major revisions of the Certified FEIR due to the involvement of

new significant effects or a substantial increase in the severity of previously identified significant impacts; (2) no substantial changes in circumstances under which the project is undertaken will occur which will require major revisions of the Certified FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; and (3) no 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 Certified FEIR was certified as complete, shows any of the following: (A) the project will have one or more significant effects not discussed in the Certified FEIR; (B) significant effects previously examined will be substantially more severe than shown in the Certified FEIR; (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; or, (D) mitigation measures or alternatives which are considerably different from those analyzed in the Certified FEIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Grading as Analyzed in the Certified EIR

Section 3.0, Project Description of the Draft EIR describes the grading operations as originally planned and evaluated in the EIR. Grading was planned to provide adequate drainage and remediate existing soil conditions on the project site.

The existing topography in RiverPark Area 'A', which was historically used for agricultural purposes, is generally flat. RiverPark Area 'B' includes a former sand and gravel mine site, including the three existing mine pits. The topography in RiverPark Area 'B' is varied due to the historic mining operations of cutting, filling, and disposal of tailings. RiverPark Area 'B' also contains the existing El Rio Retention Basins 1 and 2 developed and operated by the Ventura County Watershed Protection District.

Based on soils studies, it was anticipated that mass grading of the 701-acre Specific Plan Area would require no import or export of earth materials. Overall, approximately 10 million cubic yards of earth materials was estimated to be graded on the site. The majority of the grading was associated with the excavation and replacement of earth in RiverPark Area 'B' to stabilize the slopes of the existing mine pits and improve the structural characteristics of the soils in the plant and stockpile areas of the mine site.

Grading was planned to respond to the existing topography by holding street grades to a minimum slope in RiverPark Area 'A' with gravity drainage directed towards the proposed extension of the existing Stroube Street drain across the Specific Plan Area and to the planned drainage detention basins and

swales in RiverPark Area 'B'. Existing grades are also going to be maintained where the project site joins existing improvements such as the Vineyard Avenue, Ventura Road, Myrtle Street, and Town Center Drive. The planned grade for Oxnard Boulevard was designed to match the plans for the Oxnard Boulevard Interchange. In order to create the planned grades, some material was planned to be relocated between areas in RiverPark Areas 'A' and 'B'.

In RiverPark Area 'A,' the existing elevations range from approximately 70 to 90 feet. The maximum cut or fill in RiverPark Area 'A' as planned will be about 7 feet with an average of 5 feet of material that will need to be removed and recompacted. Overall, approximately 1.9 million cubic yards of earth materials was planned be excavated in RiverPark Area 'A'. The resulting grades will be 75 to 90 feet.

In RiverPark Area 'B', approximately 7.8 million cubic yards of earth was planned to excavated to remediate the existing soil conditions on the former mine site. The majority of this grading, approximately 5.95 million yards, was planned to occur in the stockpile area of the mine site. Approximately 1.5 million cubic yards was planned in the plant area of the mine site. The majority of the material excavated from the stockpile and plant areas will be replaced where excavated to improve the structural characteristics of the soils. The existing land bridge separating the Brigham and Small Woolsey Pits and the peninsula of fill material that presently extends into the Small Woolsey Pit from the east, consisting of approximately 0.35 million cubic yards of material, would also be excavated. Excavation of the existing slopes of the pits would involve 0.6 million cubic yards, some of which would be used as fill for slope remediation. The majority of this material will be replaced where excavated to improve the structural characteristics of the soils. El Rio Retention Basin No. 2 will also be filled. The existing elevations vary from approximately 70 to 115 feet in RiverPark Area 'B'. After grading, the elevations will vary from 80 to 100 feet.

Current Grading

As described above, the Certified FEIR evaluated a conceptual grading plan for the site that identified a total of 10 million cubic yards of material to excavated and replaced within the Specific Plan Area in a balanced grading operation.

Due to higher than anticipated soil compression encountered during the ongoing grading operations, as well as deeper excavation depths required pursuant to mitigation measures identified in the Certified EIR, an additional 500,000 to 600,000 cubic yards of soil is required in order to create the planned grades. This volume of soil represents approximately 5% of the total amount of earthwork planned in the Specific Plan Area.

This additional soil is proposed to be imported to the project site over the next 12 to 18 month period. On average, approximately 113 daily truck trips would be required to import the soil over the 12 to 18 month timeframe[1]. The sources, or potential sources of import soil, are not known at this time, but it is anticipated that all of the import soil will come from sites within Ventura County in order to minimize the cost of transporting soil to the project site.

Haul trucks transporting soils to the project site would access the RiverPark site via the recently completed Oxnard Boulevard Interchange. This recently completed interchange will allow direct access to the site from Highway 101 for trucks coming northbound or southbound.

Environmental Analysis

This **Introduction** is followed by **Section 2.0, Environmental Analysis,** which compares the environmental impacts associated with the current grading operation, including the importation of soil, with the impacts identified in the Certified FEIR for the RiverPark Project. The environmental analysis section includes separate subsections for each applicable topic addressed in the Certified FEIR. Based on a review of the Certified FEIR, it has been determined that the need to import soils to the project site has the potential to alter the analysis of the following three analysis sections previously discussed in the Certified FEIR; Air Quality, Noise, and Transportation & Circulation. Each of the three topical sections in **Section 2.0** includes a summary of the information and conclusions of the analysis in the Certified FEIR. Updated information reflecting any change in circumstances is also provided along with an analysis of the proposed soil importation to determine if any new significant impacts or any substantial increase in the severity of the impacts previously identified in the Certified FEIR would occur. This format provides the substantial evidence required by the *CEQA Guidelines* to support the preparation of an Addendum on a topic-by-topic basis.

[1] In order to generate a worst-case conservative scenario, the analysis in this Addendum assumes that 600,000 cubic yards will be imported over a 12-month period using trucks with a haul capacity of 20 cubic yards. This would result, over 264 working days in a 12-month period, on average 113 truck trips on a daily basis.

2.0 ENVIRONMENTAL ANALYSIS

AIR QUALITY

Summary of the Analysis Contained in the FEIR

The Certified FEIR for the RiverPark project included an air quality analysis, which was prepared in accordance with the Ventura County Air Pollution Control District's *Guidelines for the Preparation of Air Quality Analyses* (APCD Guidelines). The APCD Guidelines identified criteria for determining the level of significance of the impact of a project on air quality. The following discussion summarizes the construction emission analysis contained in the Certified FEIR.

During construction occurring on the site, on-site stationary sources, heavy-duty construction vehicles, construction worker vehicles, and energy use were identified as potential construction emission sources. In addition to construction vehicle emissions, fugitive dust would also be generated during grading and construction activities over the entire 701-acre Specific Plan Area.

Earthmovers typically generate approximately 21.8 pounds of airborne dust per hour of operation. The analysis assumed an average use of five earthmovers during grading activities, which equates to approximately 872 pounds of dust generated per day. Most of the airborne dust would settle on, or near, the area being graded, smaller particles would remain in the atmosphere, increasing existing particulate levels within the surrounding area. Standard dust control techniques typically reduce the amount of airborne dust generated by construction activities by an average of 70 percent. Measures to mitigate dust emissions were identified as mitigation measures for the project.

Some health problems, particularly those of the eye and respiratory tract (i.e., Coccidioidomycosis or its common name Valley Fever), may be aggravated by fugitive dust. (Valley fever is contracted through breathing spores that become airborne through disturbance of the soil.) However, Ventura County has not been recognized as an area where Coccidioidomycosis is highly endemic.[2] The only large-scale outbreak in the County occurred in Simi Valley between January 24 and March 15, 1994 following the Northridge earthquake due to uncontrolled dust clouds created by landslides.[3] Because construction-related emissions occur on a temporary basis, the APCD considered construction related air quality impacts to be less than significant. However, the APCD recommended the implementation of mitigation

[2] Eileen Schneider and others, "A Coccidioidomycosis Outbreak Following the Northridge, Calif. Earthquake," Journal of American Medicine Vol. 277, No. 11 (March 19, 1997): 904.

[3] Ibid.

measures to limit the extent of dust emissions. Based on the criteria used by the APCD to assess construction air quality emissions, the determination was made that construction emissions generated during the development of the RiverPark project would result in a less than significant impact.

With regard to the emissions associated with construction equipment, the California Air Resources Control Board (ARB) classified diesel exhaust as a toxic air contaminant. However, the ARB was researching the matter further. This process was anticipated to take several years before controls and regulations will be introduced for all sources of diesel emissions, including construction equipment, generators, school buses, and passenger vehicles. Additionally, it was anticipated that it would take several years for the ARB to develop methodologies and/or models to assess the impacts of mobile diesel exhaust sources. The APCD did not require air toxic analyses for diesel sources. When the ARB develops methodologies and/or models for diesel exhaust emissions, the APCD will incorporate them into the *Ventura County Air Quality Assessment Guidelines* as guidance. However, as construction operations occur over a relatively short time frame of up to a few years, the APCD did not consider the exposure to construction air quality emissions, including diesel exhaust, to cause any significant impacts.

Updated Analysis of Current Grading Operations

As noted in **Section 1.0**, approximately 500,000 to 600,000 cubic yards of soil will be imported to the project site. In order to minimize haul costs associated with the transport of import soil to the site, it is anticipated that all import soils would be obtained from sites within Ventura County. On average, approximately 113 truck trips would be required on a daily basis to haul this volume of soils to the project site over a 12-month period.

The primary emission source associated with this hauling operation would be generated by the use of diesel haul trucks. Haul trucks are considered to be on-road mobile emission sources by the ARB. The ARB regulates the manufacturers of on-road vehicles by way of maximum emission levels. Thus, the use of haul trucks moving soil to and from the project site would not generate a health risk to individuals due to the temporary duration required to haul the import soils to the project site. As noted in the Certified EIR, and summarized above, the ARB classified diesel exhaust as a toxic air contaminant. The most recently adopted version of the *Ventura County Air Quality Assessment Guidelines* (October 2003) prepared by the APCD does not include a methodology and/or models for the evaluation of diesel exhaust emissions.

As noted in the APCD Guidelines, the APCD does not have construction emission thresholds, since these emissions are considered temporary activities. The APCD instead recommends that construction-related

emissions be mitigated, but are not considered significant. Mitigation measures recommended by the APCD to mitigate emissions generated by construction activities to the greatest degree feasible were previously identified in the Certified EIR. These mitigation measures are also applicable for the importation of soils to the project site. Based on the APCD guidelines, the importation of soils to the site over the 12 to 18 month period is considered a temporary impact and thus considered less than significant.

Based on the analysis provided above, the need to import soils to the RiverPark site would not result in any new or substantially more severe air quality impacts than those identified in the Certified FEIR.

Mitigation Measures

The following measures were identified in the Certified FEIR for construction-related air quality emissions pursuant to APCD requirements. These measures are required to be implemented in association with the importation of soils to the project site.

Fugitive Dust Mitigation Measures

4.8-1 The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.

4.8-2 Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.

4.8-3 Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following 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 on-site 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 and reclaimed water shall be used whenever possible.

4.8-4 Inactive graded and/or excavated areas shall be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally safe dust 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.

4.8-5 Signs shall be posted on-site limiting traffic to 15 miles per hour or less.

4.8-6 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 on-site 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 APCD in determining when winds are excessive.

4.8-7 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.

4.8-8 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.

Valley Fever Mitigation Measures

4.8-9 Hire crews from local populations where possible, since it is more likely that they have been previously exposed to the fungus and are therefore immune.

4.8-10 Require crews to use respirators during project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations.

4.8-11 Require that the cabs of grading and construction equipment be air-conditioned.

4.8-12 Require work crews to work upwind from excavation sites.

4.8-13 Pave construction roads.

4.8-14 Where acceptable to the fire department, control weed growth by mowing instead of disking, thereby leaving the ground undisturbed and with a mulch covering.

4.8-15 During rough grading and site development, the primary access roads into the Specific Plan Area from adjoining paved roadways should be treated with environmentally safe dust control agents.

ROC and NOx Mitigation Measures

4.8-16 Minimize equipment idling time.

4.8-17 Maintain equipment engines in good condition and in proper tune as per manufactures' specifications.

4.8-18 Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.

4.8-19 Use alternatively fueled construction equipment, such as compressed natural gas (CNG), Liquefied natural gas (LNG), or electric, if feasible.

NOISE

Summary of the Analysis Contained in the FEIR

Development of the RiverPark Project involves two main phases of construction activities. First, overall site development, involving mass grading and construction of all major infrastructure and primary roadways would occur over the entire Specific Plan Area. The second phase of construction would consist of the construction of individual building projects within the Specific Plan Area. Equipment used would range from heavy machinery such as graders, scrapers, tractors, loaders and cranes during site development, to jackhammers, pneumatic tools, saws, and hammers during individual building projects. This equipment would generate both steady state and episodic noise that would be heard both on and off the Specific Plan Area.

Site development of the RiverPark Project would involve rough grading and site preparation activities occurring over an estimated 12-month period. RiverPark Area 'A' is bordered by the El Rio West Residential Neighborhood to the east, the Ventura Freeway to the south and the Santa Clara River to the west. RiverPark Area 'B' is bordered by industrial uses to the north, Vineyard Avenue, the El Rio Community and agricultural uses to the east and the El Rio West Neighborhood to the south. RiverPark Area 'B' has historically been used for sand and gravel mining activities. As a result, soils in the area consist of uncompacted sandy soils unsuitable for development. Additionally, there are three existing mine pits as well as the existing El Rio Retention Basins 1 and 2 in RiverPark Area 'B'. These areas would require extensive earthwork in order to properly engineer the soils to accommodate the land uses identified in the Specific Plan. As a result of these existing conditions the RiverPark Area 'B' area would require greater amounts of grading and site preparation.

Site development activities, which involve the use of backhoes, tractors, scrapers, graders, and trucks, would be conducted throughout the Specific Plan Area, and in the case of the El Rio West Neighborhood, immediately adjacent to existing residences. Equipment used during the site development and preparation activities typically generate the loudest noise levels of all standard construction equipment. These noise levels would primarily affect adjacent land uses during the construction phase. Specifically, adjacent land uses include residential uses in the El Rio West Neighborhood to the east of the Specific Plan Area with some industrial uses to the north and existing mid-rise offices in the southwest corner of the plan area.

However, of these adjacent uses, only the residences in the El Rio West Neighborhood and El Rio Community would be sensitive to noise generated from the construction activities. El Rio West is located directly adjacent to RiverPark Area 'A' and 'B', while Vineyard Avenue separates the El Rio Community from RiverPark Area 'B'. The El Rio Community has four residences fronting the RiverPark Specific Plan Area separated by Vineyard Avenue, while El Rio West has a total of sixteen (16) single-family residences and one multi-family complex directly fronting the plan area. Of these, eight residences directly front RiverPark Area 'A' with the remaining eight residences and the multi-family complex front RiverPark Area 'B'. Due to the proximity of El Rio West to the construction area, noise levels resulting from construction activities would be greater at these residences than the four located in the El Rio Community. The El Rio West residences would receive unattenuated sound waves from the on site construction activities, while concurrently providing attenuation to the El Rio West residences directly adjacent to them.

Potential construction noise impacts to existing and proposed off-site uses were analyzed based on the proximity of the El Rio West and El Rio Communities adjacent to the project site. Unattenuated noise

levels at the residences fronting the Specific Plan Area could periodically exceed 95 dB(A) during grading activities in which the grading equipment is operating along the project boundary. When compared to the noise thresholds used by the City of Oxnard, the short-term 95 dB(A) noise level generated by the heavy grading equipment was found to exceed the threshold and result in a significant impact. Mitigation measures were identified in the Certified FEIR to mitigate construction noise to less than significant levels.

Another aspect of construction related noise involves the use of heavy trucks to haul equipment and materials to the site, as well as transport debris. Additionally, all workers would most likely be transported to the site by automobiles utilizing the local roadway system which would in-turn generate additional noise. However, at the time the Certified FEIR was prepared, Vineyard Avenue experienced traffic volumes in excess of 20,000 average daily trips (ADT). The addition of construction worker trips and transport of equipment on the roadway was found to not generate a noticeable difference in ambient noise levels. Thus, the impact was determined to be less than significant. Additionally, as noted earlier, at the time that the Certified FEIR was prepared it was believed that no import or export of soils would be required. Thus, the use of haul trucks to import or export soils would not be needed and would not impact sensitive noise receptors along Vineyard Avenue.

Updated Analysis for the Soil Importation

The importation of soils to the project site would involve the use of haul trucks picking up import soils at various sites within Ventura County. These trucks would use Highway 101 to transport soils to the project site and access the site at the recently completed Oxnard Boulevard Interchange. Highway 101 in the vicinity of the project site currently supports approximately 161,000 ADTs as of 2004[4]. Based on the current traffic volumes utilizing Highway 101, the addition of 113 daily trips associated with haul of soil to the project site represents a 0.07 percent increase in daily traffic volume. This volume would not cause in audible increase in freeway noise along Highway 101. Thus, noise impacts associated with increased traffic volumes generated by the haul trucks along Highway 101 would cause less than significant impacts.

In addition, the Certified FEIR identified the use of Vineyard Avenue as the access route for trucks moving to and from the project site. The use of Vineyard Avenue would route haul trucks through existing communities to the north of Highway 101 and could generate temporary noise impacts. However, as the Oxnard Boulevard Interchange is now operational, haul trucks would be routed from

[4] California Department of Transportation. Traffic and Vehicle Data Systems Unit. 2004 All Traffic Volumes on CSHS. http://www.dot.ca.gov/hq/traffops/saferesr/trafdata/2004all.htm. Accessed: November 8, 2005.

Highway 101 and provided direct access to the site from the southern boundary at the primary access point to the site. In the vicinity of the Oxnard Boulevard Interchange on the north side of Highway 101, there are no sensitive noise receptors, such as residential communities, in the immediate area. Thus, the use of the Oxnard Boulevard Interchange by the haul trucks to deposit import soils on the project site would generate less than significant noise impacts

Based on the analysis provided above, the need to import soils to the RiverPark site would not result in any new or substantially more severe noise impacts than those identified in the Certified FEIR.

Mitigation Measures

The following measures were identified in the Certified FEIR for construction-related noise impacts. These measures are required to be implemented in association with the importation of soils to the project site.

4.9-1 On-site construction activities shall be limited to between the hours of 7:00 AM and 6:00 PM, and exclude Sundays.

4.9-2 Staging areas shall be provided on-site to minimize off-site transportation of heavy construction equipment. These staging areas shall be located to maximize the distance to residential areas.

4.9-3 Construction equipment is fitted with modern sound-reduction equipment.

4.9-4 When construction operations occur adjacent to occupied residential areas, additional noise reduction measures shall be implemented, including, but are not limited to, changing the location of stationary construction equipment, shutting off idling equipment and notifying adjacent residences in advance of construction work.

4.9-5 During rough grading construction activities adjacent to the El Rio West Neighborhood, the temporary acoustical barriers shall be provided along the property boundary separating the construction site from the residences. These barriers shall be at height equal to that of the tallest mobile equipment being used.

TRANSPORTATION & CIRCULATION

Summary of the Analysis Contained in the FEIR

An analysis of the traffic impacts of the project was conducted in the Certified FEIR in accordance with the guidelines set forth in the City of Oxnard's Traffic Impact Study Standards. Under the City's technical direction, traffic impacts on the study area transportation system were assessed for the RiverPark Project. Existing and future traffic conditions were assessed in accordance with procedures specified by the Ventura County Transportation Commission (VCTC) and SCAG in the Ventura County *Congestion Management Plan* (CMP). The analysis incorporated a detailed evaluation of traffic conditions at 33 intersections, consisting of 25 intersections in Oxnard and immediately surrounding areas and 8 intersections in the City of Ventura. Five segments of the state highway network were also evaluated. These study locations include those roadway facilities most likely to be directly impacted by the traffic generated by the RiverPark Project.

The uses allowed by the RiverPark Specific Plan would generate approximately 94,500 daily trips, of which 9,860 would occur in the evening peak traffic period. Of the total daily trips, 78,840 would leave the Specific Plan Area. The remainder of the daily trips would be trips between the allowed residential, commercial and school uses contained within the Specific Plan Area. These additional trips were found to significantly impact 8 of the 33 intersections studied. All of these impacts were mitigated with identified roadway improvements.

Traffic conditions on the Highway 101 were also forecast for future year 2020. All freeway segments analyzed were projected to operate at level of service (LOS) D and better with the exception of the Ventura Freeway south of Central Avenue, where traffic conditions were projected at LOS F in the northbound direction during the morning peak hour and in the southbound during the evening peak hour with all projected cumulative growth. Traffic from the proposed project was determined to contribute to this cumulative impact. As this level of service exceeds the minimum acceptable LOS E standard set by the Ventura County CMP, this cumulative impact is significant. Improvements necessary to achieve an acceptable level of service on the Highway 101 will be identified and addressed through the Ventura County CMP program. No unavoidable significant traffic impacts would result from the RiverPark Project.

Updated Analysis of Current Grading Operations

In order to import the roughly 500,000 to 600,000 cubic yards of import soil to the RiverPark site, a number of large haul trucks would be required to be used to transport the soil from various sites within Ventura County. On average 113 daily truck trips are required to import soils to the project site over the 12 to 18 month timeframe. In order to transport soils to the project site, it is anticipated that haul trucks would utilize Highway 101 to access the surrounding area from various locations in Ventura County. The recently completed Oxnard Boulevard Interchange would provide direct access to the site, where soils would be deposited at prearranged locations.

As noted earlier, in the vicinity of the project site, Highway 101 currently supports approximately 161,000 ADTs. The addition of all 113 daily trips to the freeway during the 12 to 18 month period required to haul soils to the site would not constitute a substantial increase of traffic volumes. Thus, the importation of soils to the project site by haul trucks would not generate a short-term impact at any of the freeway segments along Highway 101. Additionally, the use of the Oxnard Boulevard Interchange would not be impacted as a result of the use of haul trucks as there are currently very limited traffic volumes in this area due to the fact that no structures on the RiverPark site have been completed. Thus, the project site has not begun to generate operation trips that may impact this roadway segment. Nevertheless, mitigation measures recommending that the haul trucks operate during off-peak hour travel periods (between 9 AM to 4 PM) is recommended below to reduce potential short-term traffic impacts to the degree possible during the AM and PM Peak hour commutes.

Based on the analysis provided above, the need to import soils to the RiverPark site would not result in any new or substantially more severe transportation and circulation impacts than those identified in the Certified FEIR.

Mitigation Measures

The following measure is recommended to be implemented in association with the soil importation to the project site.

TC-1 Haul trucks transporting soil to the project site shall have restricted operation hours between 9 AM to 4 PM in order to avoid travel during peak hour travel periods.