2420 Oxnard Boulevard U-Haul Project

Draft Initial Study – Mitigated Negative Declaration

prepared by

City of Oxnard
Planning Division
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prepared with the assistance of

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August 2022

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Initial Study-Mitigated Negative Declaration

1. Project Title

2420 Oxnard Boulevard U-Haul Project
8.865-acre site at 2420 North Oxnard Boulevard
Assessor's Parcel Number (APN): 142-0-010-345 and 142-0-021-010

2. Lead Agency Name and Address

City of Oxnard, Planning Division
214 South C Street
Oxnard, California 93030
(805) 385-8272

3. Contact Person and Phone Number

Joe Pearson II, Principal Planner
(805) 385-8272

4. Project Location

An 8.865-acre site containing a vacant warehouse and vacant retail showroom, bordered by North Oxnard Boulevard to the west and Southern Pacific Railroad tracks to the east, in the northern portion of the city of Oxnard in Ventura County. The project site consists of two parcels currently containing a warehouse with 85,103 square feet and a 66,987-square foot retail showroom. Except for 2,291 square feet of the southwest corner of the retail showroom, which have been converted to a U-Haul store and offices for retail sales of boxes and other moving supplies, the buildings have been vacant for approximately 13 years. Figure 1 shows the regional location of the site, and Figure 2 shows the project site within the existing neighborhood context.

5. Project Sponsor's Name and Address

Amerco Real Estate Company
c/o David Randi
2727 North Central Avenue
Phoenix, Arizona 85004
(613) 748-6213

6. General Plan Designation

The project site is designated under the City of Oxnard 2030 General Plan as Commercial General, according to the General Plan Land Use Map. The 2030 General Plan permits use of Commercial General for retail centers and free-standing commercial along arterials. This designation may also

include office, residential and mixed uses. The proposed project conforms to the 2030 General Plan land use designation.

7. Zoning

The zoning designation for the proposed project site is C-2-PD, General Commercial-Planned Development. The General Commercial zoning designation permits land uses including, but not limited to, retail store or business not involving manufacturing, warehousing and storage, and equipment storage. The designation allows automobile and truck sharing, and self-storage facilities with issuance of a special use permit. The Planned Development designation is intended to ensure the orderly development of land in conformance with the General Plan of the City and to permit departures from the restrictions imposed within the basic zones. The proposed project would require a special use permit to conform to the zoning designation. Special use permits are granted for such time and upon such conditions and limitations as are deemed necessary to preserve the integrity and character of the zoning district, the utility and value of adjacent property, and the general welfare of the neighborhood and the public.

8. Description of Project

The proposed project would convert the existing warehouse space on the site into 138,517 square feet of self-storage space, including 1,263 separate units, a U-Box storage warehouse of 34,537 square feet with up to 1,119 U-Boxes stored, and 3,050 square feet of retail space. The southwest corner of the existing retail showroom has been converted to a 2,291-square foot U-Haul store and offices for retail sales of boxes and other moving supplies. The remaining space in the showroom area would be converted to 64,696 square feet of self-storage space consisting of 611 separate units. As part of the requested special use permit, the U-Haul store would also serve as a rental office for U-Haul trucks and equipment stored on site. The large parking area on the north end of the lot would provide 46 covered recreational vehicle (RV) parking storage spaces. The existing structures include a 35-foot tall, 85,103-square foot warehouse abutting a single story, 66,987-square foot warehouse to the south. The heights of the buildings would not be modified. The structures would be renovated through a reconfiguring of the interior space, construction of a new roof, and refurbishing of the building façade.

As shown on the proposed site plan (Figure 3), the proposed project would be completed in two phases. Phase I of the project would include revising the existing interior layout of the warehouse for storage of up to 1,119 U-Boxes (shown on plans as existing warehouse area) and turning the existing retail showroom into 611 individual self-storage units (shown on plans as Phase IB). Exterior improvements and parking lot improvements would be completed in this phase as required for the operation of the warehouse and storage components.

Phase II would consist of renovating the existing warehouse into three interior stories of self-storage space, with a small additional retail element. The three stories would include 138,517 square feet of floor area with 1,263 storage units. The northwest corner of the first floor would be converted to 3,050 square feet of retail space for U-Haul. The remainder of the exterior building façade and parking lot improvements would be completed during Phase II. The northern part of the parking lot would be fenced in and converted to RV storage with covered parking for approximately 46 RVs.

At the completion of these two project phases, the site would contain:

- 138,517 square feet of self-storage space, 34,537 square feet of U-Box storage space, and 3,050 square feet of retail space in the existing warehouse
- 64,696 square feet of self-storage space and 2,291 square feet of retail space in the existing retail showroom
- 46 covered RV storage spaces, with canopies 14 feet in height
- 80 parking stalls for customers and employees (67 for customers and 13 for employees)
- 12 loading and staging stalls
- 2 motorcycle parking spaces
- 15,120 square feet of rental truck and equipment parking.

Table 1 provides a breakdown of area coverage of the buildings, paving, and landscaping for the proposed project.

Table 1 Project Summary

Building Area	
Self-Storage First Floor	112,212 square feet (sf)
Self-Storage – Second Floor	41,551 sf
Self-Storage – Third Floor	49,450 sf
Warehouse	34,537 sf
Retail	5,341 sf
Total	243,091 sf (39.4% site coverage)
Parking Stalls	
Standard (9'x19')	75 stalls
Loading Stalls (12'x40')	12 stalls
Handicap (9'x19')	5 stalls
Motorcycle (3'x6')	2 stalls
Total Total Paved	80[1] stalls 194,984 sf (50.4% site coverage)
Bicycle Parking	
Exterior Stalls	5 stalls
Total	5 stalls
Landscaping	
Landscaped Periphery	24,627 sf
Landscaped Interior	14,006 sf (7.1% of paved area)
Total	38,633 sf (10.0% site coverage)

[1] This total does not include loading stalls or motorcycle stalls because they are counted separately for purposes of compliance with the City's off-street parking standards

9. Surrounding Land Uses and Setting

The area surrounding the project site consists of a mix of residential and commercial land uses:

- West of the project site, across North Oxnard Boulevard: Part of the South Bank residential neighborhood, occupied by the Meadowlake community of single-family residences (which are zoned MH-PD, Manufactured Home Planned Development) and the Casitas Apartment Homes multi-family residences (which are zoned R-4-PD, High Rise Residential - Planned Development).
- South of the Project Site: Mixed commercial and retail, with an auto-repair shop, zoned CG (General Commercial).
- North and East of the Project Site, across the Southern Pacific Railroad tracks: A grocery store and retail space. These commercial and retail land uses are zoned CG (General Commercial).

The project site currently contains a warehouse and a retail showroom which have been unoccupied for about 13 years, except for 2,291 square feet of the southwest corner of the retail showroom which have been converted to a U-Haul store and offices for retail sales of boxes and other moving supplies. The warehouse was formerly used as storage for the Levitz furniture showroom. There is a large asphalt parking lot on the north end of the project site which is not currently utilized. The project site is bordered by the Southern Pacific Railroad tracks on the north and east sides, which separate the project site from adjacent commercial land uses. Landscaping on and immediately around the site consists of small shrubs, groundcover, young, recently planted trees, and larger trees between the site and Oxnard Boulevard and along the northeastern boundary of the site.

10. Required Discretionary Approvals

The project would require the following discretionary approvals by the Oxnard City Council:

- Approval of a Special Use Permit to allow automobile and truck sharing and self-storage facilities on the project site, which is in the C-2-PD zone and therefore requires approval of a special use permit for these uses under Section 16-138 of the City's Municipal Code.
- Adoption of an Initial Study prepared in accordance with the California Environmental Quality Act (CEQA). The City of Oxnard is required to consider the Initial Study and adopt it prior to approving the project.

11. Other Public Agencies Whose Approval is Required

There are no other public agencies whose approval is required.

Figure 1 Regional Location

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Project Location

N

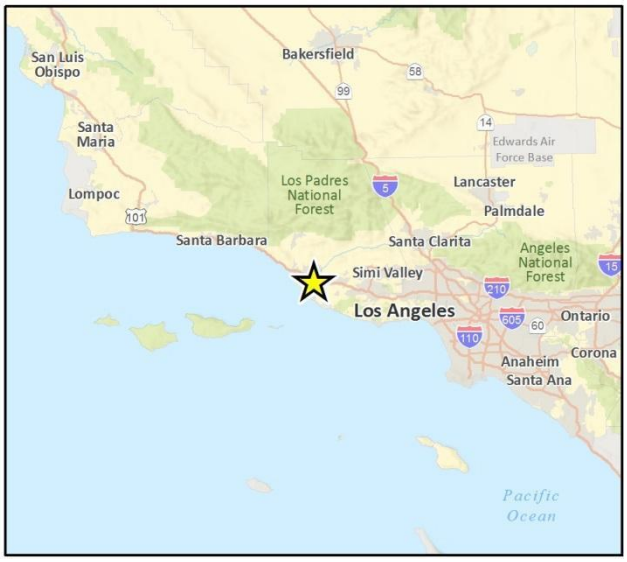
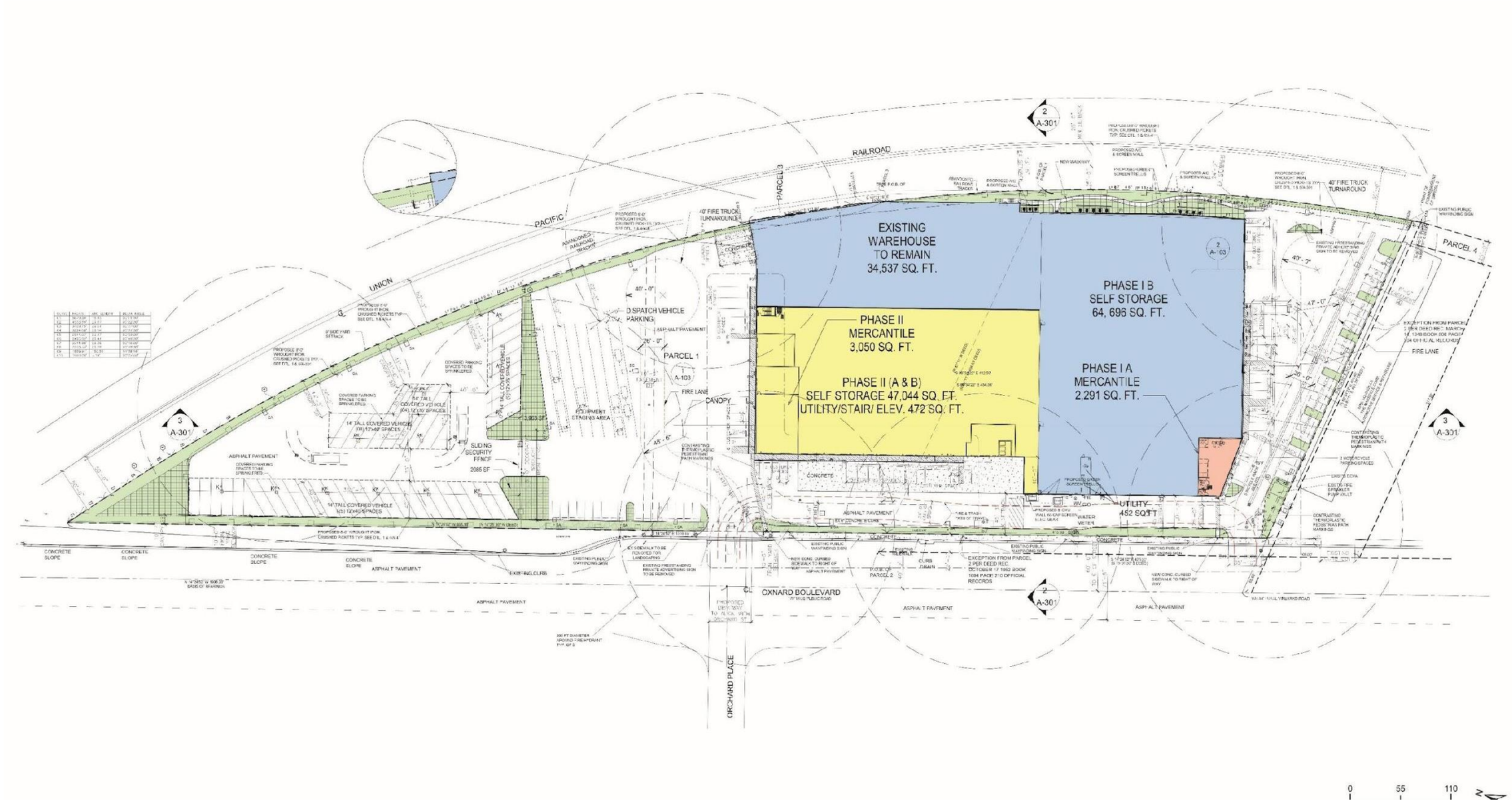


Figure 2 Project Location

Imagery provided by Microsoft Bing and its licensors © 2022.

Fig 2 Project Location

Figure 3 Proposed Site Plan



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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

□	Aesthetics and Urban Design	□	Agricultural Resources	■	Air Quality
■	Biological Resources	□	Climate Change and Greenhouse Gas Emissions	■	Cultural Resources
□	Energy	□	Geology and Soils	□	Hazards and Hazardous Materials
□	Hydrology and Water Quality	□	Land Use and Planning	□	Mineral Resources
□	Noise	□	Population, Education, and Housing	□	Public Services and Recreation
□	Transportation and Circulation	□	Tribal Cultural Resources	□	Utilities
□	Wildfire	□	Cumulative Impacts	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

8/8/2022
Date

Joe Pearson II
Printed Name

Interim Planning Manager
Title

Environmental Checklist

1 Aesthetics and Urban Design

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. 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 2030 General Plan or other City planning documents?	☐	☐	☐	■
b. 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?	☐	☐	☐	■
c. 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 2030 General Plan or other City planning documents?	☐	☐	☐	■
d. Add to or compound an existing negative visual character associated with the project site?	☐	☐	☐	■
e. Create a source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	■	☐

a. 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 2030 General Plan or other City planning documents?

The 2030 Oxnard General Plan Goals and Policies outline three broad categories of aesthetic resources, including Local Waterways, Agricultural Greenbelts, and Beaches and Coastlines. The

project site is in an urbanized area and is not adjacent to any of these designated scenic resources. The nearest scenic resource is the Santa Clara River, located 0.75 mile northwest of the project site; however, the project would not obstruct views of this resource as it does not lie within the line of sight from a designated viewpoint or public park. While the project would maintain the current overall building height of 35 feet, some parts of the roof would project slightly beyond 35 feet, as shown in Figure 4. This was approved as part of the original building permit as allowed in the C-2-PD zone with a special use permit. The new RV storage carport structures would be 14 feet in height, and would not impact views of scenic resources, as this would be well below the height limit for the land use and below the height of structures on surrounding land uses. The proposed project would not interfere with or obstruct views of General Plan designated scenic resources; therefore, the project would have no impact on a scenic vista.

NO IMPACT

b. 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 General Plan Background Report indicates that there are no California Department of Transportation (Caltrans) Designated Scenic Routes in the Oxnard Planning Area; however, the City of Oxnard identifies several road segments within the planning area as scenic (Oxnard 2006). The stretch of Oxnard Boulevard between U.S. Highway 101 and Point Mugu is designated as a scenic roadway according to the City's Scenic Highway System. The project site lies along the east side of this roadway, on the northern end of the span. Views along the urban area of this corridor are typically foreground views, including elements such as houses, stores, and streetscapes with original architectural features (City of Oxnard 2006). The project's location in an urban area, away from designated scenic resources, indicates that it would not impact scenic resources. The proposed project would therefore not damage scenic resources and there would be no impact.

NO IMPACT

c. 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 2030 General Plan or other City planning documents?

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

The project site is in an urbanized area of Oxnard. As shown in Figure 4, the proposed project would involve renovating the existing structure on the project site, including an updated façade, but the overall building height and footprint would remain the same. The overall height of the building would remain unchanged at 35 feet, but some parts of the roof would project slightly beyond 35 feet, as shown in Figure 4. Street setbacks of 10 feet (Oxnard City Code Section 16-139) would remain the same. Fences erected along the boundaries of the project site would consist of a mix of wrought-iron decorative fencing and chain-link fencing and would be under 8 feet in height in compliance with the fence limitations in commercial zones in the Oxnard City Code (Section 16-310).

The modifications to the façade of the current structures would implement neutral paint colors, minimal advertising per Oxnard City Code (Chapter 16, Article IX), and a variety of materials to help create varied visual character. Figure 4 provides colored elevations showing the proposed façade

upon project completion. The front of the building visible from Oxnard Boulevard, as shown in the west elevation of Figure 4, would consist primarily of light stone colored and ribbed metal paneling, broken up by orange panels, mimicking garage doors on the single-story section of the building. The two-story portion of the existing building would utilize off-white as the primary color, with accents of beige ribbed paneling on the building corners, and in three equally spaced divisions along the west elevation, to break up the building's visual massing. The building façade would also include wall mounted metal landscape trellises on the single-single story portions of the west and east elevations and windows at the corners of the warehouses where retail spaces would exist.

The proposed modifications would not contrast significantly with the visual character of the surrounding structures. The building just to the south of the proposed project has a stone block outer wall construction with painted metal paneling near the roof. The beige colors of the walls would not look dissimilar to that of the proposed project, and the metal paneling accents would be a shared theme. The buildings south of these, which if traveling northward on North Oxnard Boulevard would be seen before the proposed project, have a similar color scheme as well, with a beige colored stone exterior with light brown accents. The proposed project would have an improved visual quality compared to the unmaintained structures currently on the site, which have weathered paint. Additionally, the project would implement landscaping, improving upon the current parking area, which is minimally landscaped. This would include *Koelreuteria Bipinnata* (Chinese Flame Tree) along the RV storage portion of the project, partially obstructing the view of the stored vehicles form the roadway, and *Rhus Lancea* (African Sumac) along the sidewalk adjacent to the building front.

The project would be consistent with applicable zoning regulations relating to visual character and quality and would not degrade the visual character or quality of the surrounding neighborhood; therefore, the project would have no impact.

NO IMPACT

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

The project site is in an urban area with streetlights and parking lots that create nighttime light pollution. The proposed project would not contribute a significant amount of additional light during nighttime hours, as lighting would not include more than typical exterior lighting for customers and workers to safely use the buildings and parking lots. Any new lighting would be required to conform to requirements in Section 16-320 of the Oxnard City Code, which requires lighting to illuminate only the intended surfaces and to not exceed seven foot-candles. Additionally, the project would not create substantial glare, as reflective surfaces used on the project exterior would include only a limited number of windows at the corners of the building front along Oxnard Boulevard. Furthermore, metal paneling would be painted and thus not highly reflective. Reflective surfaces would be similarly limited along the building's other elevations. Therefore, the project would not create a new substantial source of light or glare that would adversely affect views in the area and project impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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Figure 4 Project Building Elevations

Source: Lauterbach & Associates Architects Inc., 2022.

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2 Agricultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	□	□	□	■
b. Conflict with existing zoning for agricultural use or an existing Williamson Act contract?	□	□	□	■
c. 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?	□	□	□	■

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

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

c. 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?

According to the California Department of Conservation, Ventura County Important Farmland Map, the project site is not on land designated as Prime Farmland, Unique Farmland or Farmland of statewide importance (California Department of Conservation 2018). The project site is currently developed and zoned for commercial land use according to the 2030 General Plan, is not zoned for agricultural use, and (according to the California Department of Conservation Division of Land Resource Protection) is not under Williamson Act Contract. Additionally, the project site is not zoned as any type of timberland or forest. Pursuant to Division 9 Sec. 16-135 of the City of Oxnard Municipal Code, agricultural uses are not listed as a permitted use within the C-2 zone. Therefore, the proposed project's implementation would not conflict with the proposed zoning for the site, since agricultural uses are not permitted under the existing or proposed zone. The project site is in a fully urbanized area not adjacent to any farmlands, and implementation of the project would not have any indirect impacts on farmland or forestland that could lead to conversion to non-agricultural or non-forest uses. Therefore, the proposed project would have no impact on agriculture or forestry resources.

NO IMPACT

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3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the Ventura County AQMP?	□	□	□	■
b. Violate any federal or state air quality standard or contribute substantially to an existing or projected air quality standard violation?	□	□	□	■
c. Result in a cumulatively considerable net increase of any criteria in excess of quantitative thresholds recommended by the VCAPCD)?	□	■	□	□
d. Expose sensitive receptors to pollutant concentrations exceeding state or federal standards or in excess of applicable health risk criteria for toxic air contaminants?	□	□	■	□
e. Create objectionable odors affecting a substantial number of people?	□	□	■	□

Environmental Setting

The project site is in the South-Central Coast Air Basin (Basin), which covers San Luis Obispo, Santa Barbara, and Ventura Counties. The Ventura County Air Pollution Control District (VCAPCD) monitors and regulates local air quality in Ventura County and manages the Air Quality Management Plan (AQMP). The analysis presented in this section is based on information found in the Ventura County Air Quality Assessment Guidelines (Guidelines), adopted by the VCAPCD in 2003.

Air quality is affected by stationary sources (e.g., industrial uses and oil and gas operations) and mobile sources (e.g., motor vehicles). Air quality at a given location is a function of several factors, including the quantity and type of pollutants emitted locally and regionally, and the dispersion rates of pollutants in the region. Primary factors affecting pollutant dispersion are wind speed and direction, atmospheric stability, temperature, the presence or absence of inversions, and topography. The project site is in the southeastern portion of the Basin, which has moderate variability in temperatures, tempered by coastal processes. The air quality within the Basin is influenced by a wide range of emission sources, such as dense population centers, heavy vehicular traffic, industry, and weather.

Air Quality Standards and Attainment

The VCAPCD is required to monitor air pollutant levels to ensure National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are met. If the standards are met, the Basin is classified as being in "attainment." If the standards are not met, the Basin is classified as being in "nonattainment," and the VCAPCD is required to develop strategies to meet the standards. According to the California Air Resources Board (CARB) Area Designation Maps, the project site is in a region identified as being in nonattainment for ozone NAAQS and CAAQS and nonattainment for particulate matter less than 10 microns in diameter (PM_{10}) CAAQS (CARB 2019). In February 2017, the VCAPCD adopted the 2016 Ventura County AQMP, which provides a strategy for the attainment of federal ozone standards.

The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 2.

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).[a]

A more detailed discussions on the health effects associated with exposure to suspended particulate matter can be found at the following site: U.S. EPA 2016, http://www.epa.gov/airquality/urbanair/

San Joaquin Valley Fever (formally known as Coccidioidomycosis) is an infectious disease caused by the fungus *Coccidioides immitis*. San Joaquin Valley Fever (Valley Fever) is a disease of concern in the Basin. Infection is caused by inhalation of *Coccidioides immitis* spores that have become airborne when dry, dusty soil or dirt is disturbed by natural processes, such as wind or earthquakes, or by human-induced ground-disturbing activities, such as construction, farming, or other activities (VCAPCD 2003). In 2019, 260 Ventura County residents were identified with or confirmed or suspected cases of Valley Fever through October 31 of that year (Ventura County Star 2019).

Air Pollutant Emission Thresholds

The VCAPCD's Guidelines recommend specific air emission criteria and threshold levels for determining whether a project may have a significant adverse impact on air quality within the Basin. The proposed project would have a significant impact if operational emissions exceed 25 pounds per day of reactive organic compounds (ROC; also referred to as reactive organic gases, or ROG) or 25 pounds per day of nitrogen oxides (NO_X). The 25 pounds per day threshold for ROC and NO_X is not intended to be applied to construction emissions since such emissions are temporary. Nevertheless, VCAPCD's Guidelines state construction-related emissions should be mitigated if estimates of ROC or NO_X emissions from heavy-duty construction equipment exceed this threshold.

The VCAPCD has not established quantitative thresholds for particulate matter for either operation or construction. However, the VCAPCD indicates a project that may generate fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons, or which may endanger the comfort, repose, health, or safety of any such person, or which may cause or have a natural tendency to cause injury or damage to business or property, would have a significant air quality impact. This threshold is applicable to the generation of fugitive dust during construction grading and excavation activities. The VCAPCD Guidelines recommend fugitive dust mitigation measures that should be applied to all dust-generating activities. Such measures include minimizing the project disturbance area, watering the site prior to commencement of ground-disturbing activities, covering all truck loads, and limiting on-site vehicle speeds to 15 miles per hour or less.

Applicable VCAPCD Rules and Regulations

The VCAPCD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Relevant rules and regulations to the project include those listed below.

Rule 50 (Opacity)

This rule sets opacity standards on the discharge from sources of air contaminants. This rule would apply during construction of the project.

Rule 51 (Nuisance)

This rule prohibits any person from discharging air contaminants or any other material from a source that would cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endangers the comfort, health, safety, or repose to any considerable number of persons or the public. The rule would apply during construction and operational activities.

Rule 55 (Fugitive Dust)

This rule requires fugitive dust generators, including construction and demolition projects, to implement control measures limiting the amount of dust from vehicle track-out, earth moving, bulk material handling, and truck hauling activities. The rule would apply during construction and operational activities.

Rule 55.1 (Paved Roads and Public Unpaved Roads)

This rule requires fugitive dust generators to begin the removal of visible roadway accumulation within 72 hours of any written notification from the VCAPCD. The use of blowers is expressly prohibited under any circumstances. This rule also requires controls to limit the amount of dust from any construction activity or any earthmoving activity on a public unpaved road. This rule would apply during all construction activities.

Rule 55.2 (Street Sweeping Equipment)

This rule requires the use of PM_{10}-efficient street sweepers for routine street sweeping and for removing vehicle track-out pursuant to Rule 55. This rule would apply during construction activities.

Rule 74.2 (Architectural Coatings)

This rule sets limits on the volatile organic compound (VOC) content of architectural coatings. Non-flat coatings are limited to 50 grams per liter of VOC content, flat coatings are limited to 50 grams per liter of VOC content and traffic marking coatings are limited to 100 grams per liter of VOC content. The project would be required to comply with this rule during both construction and operation.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the Ventura County AQMP?

b. Would the project violate any federal or state air quality standard or contribute substantially to an existing or projected air quality standard violation?

According to the VCAPCD's Guidelines, a project may be inconsistent with the applicable air quality plan if it would cause the existing population to exceed forecasts contained in the most recently adopted AQMP. The VCAPCD adopted the 2016 Ventura County AQMP to demonstrate a strategy for, and reasonable progress toward, attainment of the federal 8-hour ozone standard. The 2016 Ventura County AQMP relies on the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) forecasts of regional population growth in its AQMP population projections.

The proposed project includes commercial land uses that would result in a small increase of available jobs that could potentially increase Oxnard's population if these jobs were filled by employees who became new residents of the city. As discussed in Section 14, *Population, Education, and Housing*, the proposed project would potentially result in 54 new jobs, which could result in a population increase of the same magnitude. These increases in employment and population would contribute less than one percent of the SCAG employment growth projections for Oxnard, which is expected to add 10,200 new jobs between 2020 and 2035. Therefore, the project would not cause exceedances of the growth forecasts employed in the 2020 SCAG RTP/SCS and the 2016 Ventura County AQMP, and no impact would occur.

NO IMPACT

c. Would the project result in a cumulatively considerable net increase of any criteria in excess of quantitative thresholds recommended by the VCAPCD?

Methodology

Construction project emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. CalEEMod was developed by the South Coast Air Quality Management District and is used by jurisdictions throughout California to quantify criteria pollutant emissions. The model calculates criteria pollutant emissions and GHGs emissions, reported as carbon dioxide equivalents (CO_2e). The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices A, D, and E (CAPCOA 2021). The input data and subsequent construction and operation emission estimates for the project are detailed in the following discussion. CalEEMod output files for the project are included in Appendix A to this report.

For the purpose of modeling, the analysis relied upon the following assumptions:

- **Unrefrigerated Warehouse without Rail Land Use.** The proposed project land uses were grouped together as warehouse land uses to simplify modeling. The modeled square footage of 243,091 square feet includes the retail space, self-storage space from both building floors, and the warehouse use. Default fleet mixes within CalEEMod were used.
- **Parking Lot Land Use.** The proposed project includes 46 RV storage spaces and an equipment staging area, which were included in the modeling as a parking lot. This asphalt paved area was grouped together with customer parking spaces, resulting in 194,984 square feet of parking lot area.
- **Construction Phases.** The proposed project's construction phases were modeled in CalEEMod as occurring sequentially but continuously. CalEEMod default construction phases (e.g., site preparation, grading, building construction, paving, architectural coating) were used for modeling. Project construction was modeled as lasting a total of 300 days.

Construction Impacts

Construction activities associated with development of the proposed project would temporarily generate emissions associated with equipment and fugitive dust. Construction emissions modeled include emissions generated by construction equipment used on the site and emissions generated by vehicle trips associated with construction, such as worker and vendor trips. It is assumed all construction equipment used would be diesel-powered. Reactive organic compounds are generated primarily during architectural coating phases of project construction.

Estimated maximum daily ROC, NO_X, CO, PM_{10}, and $PM_{2.5}$ construction emissions are shown in Table 3. The VCAPCD's 25 pounds per day thresholds for ROC and NO_X do not apply to construction emissions because such emissions are temporary; however, as stated above in the *Air Emissions Thresholds* section, ROC and NO_x emissions should be mitigated if estimated emissions from heavy-duty construction equipment exceed the 25 pounds per day threshold. Table 3 shows ROC and NO_X emissions would exceed the 25 pounds per day threshold during construction. However, as shown in Table 2.1 of the Winter season CalEEMod output in Appendix A, the ROC exceedance would result from emissions from application of architectural coatings to the building rather than from heavy-duty construction equipment emissions. Since the ROC emissions would not be a result of emissions from heavy equipment, mitigation would not be required for ROC. Consistent with VCAPCD's Guidelines, Mitigation Measure AQ-1 is required to reduce the project's NO_X emissions from construction equipment.

Table 3 Construction Emissions (pounds/day)

	Maximum Daily Emissions (pounds per day)					
Emission Source	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Construction Year 2022	3.2	33.1	20.1	<0.1	21.4	11.6
Construction Year 2023	96.6	16.1	19.2	<0.1	1.8	1.0

SO_2 = sulfur dioxide; $PM_{2.5}$ = particulate matter with a diameter of less than 2.5 microns

Notes: All emissions modeling was done using CalEEMod. See Appendix A for modeling worksheets. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results from the winter season CalEEMod output, which account for compliance with regulations and project design features.

Operational Impacts

Operational emissions are comprised of area source emissions, energy emissions, and mobile source emissions. Area source emissions are generated by landscape maintenance equipment; consumer products such as solvents and propellants contained in aerosol and non-aerosol products; pesticide application; and architectural coating. Emissions attributed to energy use include electricity and natural gas consumption for space and water heating. Mobile source emissions are generated by the increase in motor vehicle trips to and from the project site associated with operation of on-site development. CalEEMod provides default trip generation rates, which were used to estimate mobile source emissions.

Table 4 summarizes estimated emissions associated with operation of the project. Project operation would not exceed the VCAPCD 25 pounds per day emission thresholds for ROG and NO_x. Thresholds have not been established for carbon monoxide (CO), sulfur dioxide (SO_2), or particulate matter (PM_{10} and $PM_{2.5}$); the project would not result in emissions over 25 pounds per day for these criteria pollutants. Therefore, operation of the proposed project would not generate emissions of criteria air pollutants that would have a significant impact on regional air pollution.

Table 4 Operational Emissions (pounds/day)

Pollutant	Total Emissions	Significance Threshold	Significant Impact?
ROC	6.2	25	No
NO_x	1.7	25	No
CO	11.9	N/A	N/A
SO_2	<0.1	N/A	N/A
PM_{10}	2.5	N/A	N/A
$PM_{2.5}$	0.7	N/A	N/A

Notes: See Appendix A for CalEEMod worksheets. Emission data is pulled from "mitigated" results from the winter season CalEEMod output, which account for compliance with regulations and project design features.

Mitigation Measures

AQ-1 NO_X Construction Reduction Measures

Per VCAPCD Guidelines, when construction emissions exceed 25 pounds per day for NO_X, the following measures shall be implemented:

- Minimize equipment idling time.
- Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications.
- Lengthen the construction period during smog season (May through October) to minimize the number of vehicles and equipment operating at the same time.
- Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.
- In addition, per recent VCAPCD guidance on other projects, project construction shall use Tier 3 or above construction equipment for all off-road diesel equipment that has greater than 50 horsepower. A copy of each unit's certified tier specification shall be provided at the time of mobilization of each applicable unit of equipment.

Because operation of the proposed project would not generate emissions exceeding applicable thresholds of significance, and because Mitigation Measure AQ-1 would reduce construction emissions impact to a less than significant level, the project's air quality impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. 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?

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools, hospitals, religious facilities, and daycare centers. The closest sensitive receptors to the project site include residences 220 feet to the west of the project site, across North Oxnard Boulevard.

The proposed project does not include operational uses that would emit substantial amounts of pollution or toxic air contaminants that would affect nearby sensitive receptors. Diesel particulate matter (DPM) emitted from construction equipment would be a source of toxic air contaminants during project construction; however, project construction is expected to not require extensive use of diesel-powered heavy equipment, and emissions would be temporary. Additionally, the predominant wind direction in the project area is from the west (due to the prevailing sea breeze, also referred to as onshore flow), which means toxic air contaminants emitted during construction would primarily be blown away from the sensitive receptors to the west of the project site.

The population of Oxnard has been and will continue to be exposed to Valley Fever from agricultural and construction activities occurring throughout the region. The fungal spores responsible for Valley Fever generally grow in virgin, undisturbed soil. Construction of the proposed project would not include significant grading or soil movement activities; therefore, construction is unlikely to pose a substantial risk of infection. Substantial increases in the number of reported cases of Valley Fever tend to occur only after major ground-disturbing events such as the 1994 Northridge earthquake (VCAPCD 2003). Construction of the proposed project would not result in a comparable amount of ground disturbance. Therefore, construction of the proposed project would not significantly increase the risk to public health above existing background levels. Because the proposed project does not pose a substantial risk for Valley Fever, Valley Fever-specific mitigation measures detailed in the VCAPCD Guidelines would not be required.

The proposed project would have a less than significant impact from exposure of sensitive receptors to substantial pollutant concentrations.

LESS THAN SIGNIFICANT IMPACT

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

The proposed project includes warehouse/self-storage and retail space with vehicle storage and would not create objectionable odors during project operation. Project construction could generate odors associated with heavy-duty equipment operation. However, project construction would not

require extensive use of diesel-powered heavy equipment and, therefore, such odors would be temporary in nature and limited to the duration of construction in the vicinity of the project site. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. 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?	□	■	□	□
b. 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 Wildlife and Wildlife or U.S. Fish and Wildlife Service?	□	□	□	■
c. Have a substantial adverse effect on federally protected waters of the U.S. 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?	□	□	□	■
d. 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?	□	□	□	■
e. Conflict with any local policies or ordinances protecting biological resources?	□	□	□	■
f. Conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	□	□	□	■

Biological Setting

The project site is located on an approximately 8.865-acre developed lot at 2420 North Oxnard Boulevard (APNs 142-0-010-345 and 142-0-021-010) and is bordered by North Oxnard Boulevard and the South Bank residential neighborhood to the west , the Southern Pacific Railroad tracks to the east and north and developed parcels to the south. Based on a survey of the project site and surrounding area conducted by Rincon Consultants on March 21, 2022, and review of aerial imagery of the project vicinity, the project site is entirely developed, consisting of buildings, asphalt parking lots with hardscape, and ornamental landscape. Dominant ornamental vegetation observed includes Mexican fan palm (*Washingtonia robusta*), gum tree (*Eucalyptus* spp.), Peruvian pepper (*Schinus molle*), Moreton Bay fig (*Ficus macrophylla*), various ornamental hedges, and non-native grasses such as ripgut brome (*Bromus diandrus*) and foxtail barley (*Hordeum murinum*). No native or protected trees or other vegetation occur on the Project site.

The area surrounding the project site is developed. Immediately to the north of the project site, the Southern Pacific Railroad tracks travel in a northwest to southeast direction. Commercial development and West Esplanade Drive occur to the north of the railroad tracks. North Oxnard Boulevard and residential development exist to the west of the project site. The Southern Pacific Railroad tracks and commercial development occur to the east of the project site, and commercial development exists to the south.

U.S. Highway 101 is approximately 0.25 mile to the east, with residential neighborhoods and commercial development beyond. The nearest undeveloped open space and natural habitats include the Santa Clara River approximately one mile to the northwest, the Camarillo Hills over five miles to the east, and the foothills of the Santa Susana Mountains over six miles to the northeast. The Pacific Ocean is approximately five miles to the west.

Impact Analysis

a. 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 project site is currently developed and mostly covered by building footprints and asphalt surfaces. The site is in a developed urban area and is not in or near an area identified as containing biological resources of significance, as shown in Figure 5-1 of the General Plan Background Report (City of Oxnard 2006). There are no native or undisturbed lands on the project site. Because the project site and surrounding lands are entirely developed or disturbed, no habitat is present that could support special-status species. Various wildlife species typical of urban environments are expected to occur on the project site, mostly common birds such as mourning dove (*Zenaida macroura*), European starling (*Sturnus vulgaris*), Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), house finch (*Carpodacus mexicanus*), and house sparrow (*Passer domesticus*). Common terrestrial wildlife such as ground squirrel (*Spermophilus beecheyi*) and other rodents are expected to occur as well.

According to the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CDFW 2022a), CDFW Special Animals List (CDFW 2022b), and the California Native Plant Society (CNPS) *Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2022), numerous special-status species occurrences have been recorded in the undisturbed open spaces in

the region. However, none of these species would occur on or adjacent to the project site since it is developed and because it is significantly fragmented from any native habitat and/or open space.

The nearest United States Fish and Wildlife Service (USFWS) designated Critical Habitat, located approximately 0.85 mile to the northwest along the Santa Clara River (USFWS 2022a), is habitat for the southwestern willow flycatcher (*Empidonax traillii extimus*). Project implementation would not affect or modify either USFWS designated Critical habitat or non-designated habitat for the southwestern willow flycatcher or any other special-status species. The only vegetation on the project site is in a small area on the northern edge adjacent to Oxnard Boulevard and the Southern Pacific Railroad tracks, comprised of ornamental vegetation and ruderal plant species. Given this area consists solely of ornamental or ruderal vegetation and is isolated from any other natural areas, it does not contain and is not suitable habitat for protected species.

Resident and migratory bird species may forage and/or nest in the ornamental vegetation as well as other areas that contain trees on and adjacent to the project site. Construction activities such as vegetation removal, grading, or building construction could result in impacts to nesting birds. Destruction of eggs, nests, and nestlings is prohibited by federal and state law. Section 3503.5 of the California Fish and Game Code (CFGC) specifically protects birds of prey, and their nests and eggs, against take, possession, or destruction. Section 3513 of the CFGC also incorporates restrictions imposed by the federal Migratory Bird Treaty Act of 1918 (MBTA) with respect to migratory birds, which consists of all native bird species. Implementation of Mitigation Measure BIO-1 would ensure compliance with CFGC Section 3503.5 and 3513, and the MBTA, with respect to nesting birds by reducing the impact through pre-construction nesting bird surveys and avoidance of active nests.

While the existing buildings and trees on the project site may provide potential roosting sites for various bat species, there is limited potential for special status bat species (e.g., pallid bat [*Antrozous pallidus*], Townsend's big-eared bat [*Corynorhinus townsendii*], western red bat [*Lasiurus blossevillii*]), to occur on the Project site. The project site consists of developed buildings and trees that receive frequent disturbance (e.g., tree maintenance, vehicle traffic near trees), and special status bat species typically require natural habitats (e.g., cliffs, caves, undisturbed trees) rather than developed buildings. Additionally, no preferred aquatic habitat for foraging exists within one mile of the project site. While the Santa Clara River channel is located less than one mile northwest of the project site, the Santa Clara River in the northern portion of Oxnard does not contain flowing or ponded water for months out of the year, and therefore does not provide preferred foraging habitat for special status bat species. Finally, there are no CNDDB records of any special status bat species within five miles of the project site. Therefore, special status bat species have low potential to occur on the project site, and there would be no impacts requiring mitigation as a result of the project.

There is no potential for any other special-status species to occur on the project site due to its developed nature, and with incorporation of mitigation measures for nesting birds, impacts to special-status species or nesting birds would be avoided/minimized and impacts would be less than significant.

Mitigation Measures

BIO-1 Nesting Bird Surveys

Nesting bird surveys shall be conducted by a qualified biologist prior to any construction activities during bird breeding season from February 1 through August 31. If no nesting birds are detected during these surveys, then construction-related activities may proceed. Active nests in and adjacent to the construction zone shall be avoided and provided a minimum buffer as determined by the

qualified biologist (CDFW recommends a 300-foot-wide nest avoidance buffer or 500 feet for all active raptor nests) prior to the commencement of construction. Construction activities within the buffer must be conducted at the discretion of the qualified biologist.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. 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, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

As described in the *Biological Setting* section above, the project site does not support any native vegetation communities or riparian habitat. The closest sensitive riparian habitat exists 0.85 mile to the northwest along the Santa Clara River (USFWS 2022a). Therefore, the Project would not affect riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS. No impact would occur.

NO IMPACT

c. Would the project have a substantial adverse effect on federally protected waters of the U.S. 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?

According to the National Wetlands Inventory (USFWS 2022b) and Google Earth (Google Earth Pro 2022), no wetlands are present on or adjacent to the project site. According to the USFWS, the nearest wetland area is an unnamed, concrete-bottomed drainage ditch located adjacent to the sidewalk on the western side of North Oxnard Boulevard. This feature is considered a riverine, intermittent, streambed with artificial substrate that is seasonally flooded (R4SBCr) (USFWS 2021). The project site is not hydrologically connected with this wetland area or other wetland systems in the region; therefore, there would not be any substantial adverse effects on state or federally protected wetlands as a result of the project.

NO IMPACT

d. 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?

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

As mentioned above, the project site is in an urban area and is surrounded by existing commercial, industrial, and residential development as well as established transportation corridors such as U.S. Highway 101. Additionally, the project site is not located within or adjacent to natural communities

identified in the planning area (City of Oxnard 2006). The nearest corridor for regional wildlife movement is 0.85 mile to the northwest along the Santa Clara River. The proposed project would be constructed on a fully developed site that does not connect areas of natural habitat and is not located near wildlife nurseries; therefore, the project would have no impact on wildlife movement.

NO IMPACT

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The proposed project would include removal and replacement of existing ornamental trees on site. The 2030 General Plan Policy ER-10.2 provides for the development and implementation of a tree management program and ordinance for protecting against the removal of certain tree species; however, this ordinance has not yet been adopted (City of Oxnard 2011). While the 2030 General Plan provides other policies designed to protect sensitive habitats from new development within and near these habitats, as explained above, no sensitive habitat occurs on or immediately around the project site. The proposed project would not conflict with a local policy or ordinance protecting biological resources.

NO IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site is in an urban area as designated by the General Plan Background Report and is zoned for general commercial land use (City of Oxnard 2006). Additionally, as explained above, it would not substantially impact any native habitat or natural community. Therefore, the proposed project would not conflict with an adopted local, regional, or state habitat conservation plan.

NO IMPACT

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5 Climate Change and Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	□	□	■	□
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases or otherwise conflict with the state goal or reducing greenhouse gas emissions in California?	□	□	■	□
c. Contribute to or be subject to potential secondary effects of climate change (e.g., sea level rise, increase fire hazard)?	□	□	■	□

Overview of Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence which takes place in Earth's atmosphere to help regulate the temperature of the planet. The majority of radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions.

GHGs occur both naturally and as a result of human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Anthropogenic activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the concentration of GHGs in the atmosphere that trap heat. Since 1750, estimated concentrations of CO_2, methane, and nitrous oxide in the atmosphere have increased over by 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (Forster et al. 2007).

Regulatory Framework

Local Regulations

OXNARD 2030 GENERAL PLAN

The Oxnard 2030 General Plan, adopted in 2011, contains a *Sustainable Communities* section which intends to provide a better understanding of the environmental issues of climate change and adaptation, sea level rise, and energy conservation and generation. This section outlines goals and policies identified to help Oxnard maintain its commitment to supporting SB 375 and AB 32. Certain policies identified in the 2030 General Plan are intended for implementation in a future Climate Action and Adaptation Plan to establish GHG reduction targets.

State Regulations

The State of California considers GHG emissions and the impacts of climate change to be a serious threat to the public health, environment, economic well-being, and natural resources of California, and has taken an aggressive stance to mitigate its impact on climate change through the adoption of policies and legislation. CARB is responsible for the coordination and oversight of state and local air pollution control programs in the state. California has numerous regulations aimed at reducing the state's GHG emissions; some of the major initiatives are summarized below.

CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006 (ASSEMBLY BILL 32 AND SENATE BILL 32)

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

The CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use.

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 (discussed later). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic

investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of six metric tons (MT) of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2020). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

SENATE BILL 375

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. SCAG was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

SENATE BILL 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state's Renewables Portfolio Standard Program. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Regional Regulations

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG)

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and State air quality requirements, including the Transportation Conformity Rule and other applicable federal, State, and air district laws and regulations. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, the goals of regional and State air quality plans to attain NAAQS. In addition, SCAG is a co-producer with the SCAQMD of the transportation strategy and transportation control measure sections of the AQMP for the Basin.

On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal). The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting

implementation of sustainability policies. The SCS establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2020).

VENTURA COUNTY REGIONAL ENERGY ALLIANCE

In 2015, the Ventura County Regional Energy Alliance established a climate action plan, known as Climate on the Move, which includes 2010-2012 GHG inventories, 2020 forecasts, and reduction target options for the City of Oxnard, as well as other local government members. The purpose of the climate action plan is to identify the most significant contributors to GHG emissions and establish strategies to reduce GHG emissions to meet AB 32 requirements. The plan for the City of Oxnard focuses primarily on setting targets for reducing residential emissions from natural gas and electricity. However, successful implementation of the plan depends on the implementation of each city jurisdiction's policies and programs and the plan itself does not include energy or GHG reduction measures that are applicable to land use projects.

Significance Thresholds

To evaluate whether a project may generate a quantity of GHG emissions that may have a significant impact on the environment, a number of operational bright-line significance thresholds have been developed by state and regional agencies. Significance thresholds are numeric mass emissions thresholds which identify the level at which additional analysis of project GHG emissions is necessary. Projects that attain the significance target, with or without mitigation, would result in less than significant GHG emissions. Some significance thresholds have been developed to reflect a 90 percent capture rate tied to the 2050 reduction target established in the Governor's Executive Order S-3-05, which sets a GHG reduction target of 90 percent below current levels by 2050.

In late 2015, the California Supreme Court's Newhall Ranch decision confirmed there are multiple potential pathways for evaluating GHG emissions consistent with CEQA, depending on the circumstances of a given project (Center for Biological Diversity v. Department of Fish and Wildlife [2015] 62 Cal. 4th 204). Given the legislative attention and judicial action regarding post-2020 goals and the scientific evidence that additional GHG reductions are needed through the year 2050, the Association of Environmental Professionals' (AEP) Climate Change Committee published a white paper in October 2016 to provide guidance on defensible GHG thresholds for use in CEQA analyses and GHG reduction targets in climate action plans in light of the change in focus on the 2030 reduction target and questions raised in the Newhall Ranch case.

The AEP Climate Change Committee white paper identified seven thresholds for operational emissions. The following four methods described are the most widely used evaluation criteria.[2]

1. Consistency with a Qualified GHG Reduction Plan. For a project located within a jurisdiction that has adopted a qualified GHG reduction plan (as defined by CEQA Guidelines Section 15183.5), GHG emissions would be less than significant if the project is anticipated by the plan and fully consistent with the plan. However, projects with a horizon year beyond 2020 should not tier from a plan that is qualified up to 2020.
2. Bright Line Thresholds. There are two types of bright line thresholds:

[2] The three other thresholds are best management practices/best available mitigation, compliance with regulations, and a hybrid threshold concept: separate transportation and non–transportation threshold. These are not commonly used and do not specifically apply to this project.

- Standalone Threshold. Emissions exceeding standalone thresholds would be considered significant.
- Screening Threshold. Emissions exceeding screening thresholds would require evaluation using a second tier threshold, such as an efficiency threshold or other threshold concept to determine whether project emissions would be considered significant.
    - However, projects with a horizon year beyond 2020 should take into account the type and amount of land use projects and their expected emissions out to the year 2030.

3. Efficiency Thresholds. Land use sector efficiency thresholds are currently based on AB 32 targets and should not be used for projects with a horizon year beyond 2020. Efficiency metrics should be adjusted for 2030 and include applicable land uses.
4. Percent Below "Business as Usual" (BAU). GHG emissions would be less than significant if the project reduces BAU emissions by the same amount as the statewide 2020 reductions. However, this method is no longer recommended following the Newhall Ranch ruling.

Under Option 1, impacts would be less than significant if a project is consistent with an approved local or regional qualified GHG reduction plan. As discussed under *Oxnard 2030 General Plan* above, the City of Oxnard 2030 General Plan contains policies intended for implementation in a future Climate Action and Adaptation Plan, but the City does not yet have a CAP. Therefore, Option 1 would not be a suitable threshold to use for this analysis. Because the project has a post-2020 horizon year, Option 3 would also not be a suitable threshold. Furthermore, BAU thresholds are no longer recommended following the Newhall Ranch ruling; therefore, Option 4 would not be a suitable threshold. As a result, the most appropriate threshold for the project is Option 2, which is the bright line threshold of 3,000 MT of CO_2e recommended by the SCAQMD's GHG CEQA Significance Threshold Working Group in September 2010 (SCAQMD 2010). While this threshold has not been formally adopted by the SCAQMD, it has been used by many agencies in Southern California as a significance threshold for evaluating GHG emissions in CEQA analyses.

VCAPCD has not established quantitative significance thresholds for evaluating GHG emissions in CEQA analyses. Instead, VCAPCD recommends using the California Air Pollution Control Officers Association *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act* white paper and other resources when developing GHG evaluations (VCAPCD 2006). The *CEQA and Climate Change* paper provides a common platform of information and tools to support local governments and was prepared as a resource, not as a guidance document. However, CEQA Guidelines section 15064.4 expressly provides that a "lead agency shall have discretion to determine, in the context of a particular project," whether to "use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use." A lead agency also has discretion under the CEQA Guidelines to "rely on a qualitative analysis or [quantitative] performance based standards."

In light of the lack of a specific GHG threshold from VCAPCD, it is appropriate to refer to guidance from other agencies when discussing GHG emissions. Thus, for the purposes of this analysis, the bright-line threshold developed by the SCAQMD (3,000 MT CO_2e per year for development projects) is considered to determine the significance of GHG emissions.

Although construction activity is addressed in this analysis, the California Air Pollution Control Officers Association (CAPCOA) does not discuss whether any threshold approaches adequately address impacts from temporary construction activity. As stated in the *CEQA and Climate Change* white paper, "more study is needed to make this assessment or to develop separate thresholds for

construction activity" (CAPCOA 2008). Nevertheless, air districts such as the SCAQMD have recommended that GHG emissions from construction be amortized over 30 years and added to operational GHG emissions to determine the overall impact of a proposed project (SCAQMD 2008).

Impact Analysis

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

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

Project construction is assumed to occur over a period of approximately 13 months, based on CalEEMod default assumptions. Based on CalEEMod modeling results, construction activities for the project would generate an estimated 151.4 MT of CO_2e in 2022 and 344.7 MT of CO_2e in 2023, for a total of 496.1 MT of CO_2e over the assumed 13-month construction period (Table 5). Amortized over a 30-year period (the assumed life of the project per SCAQMD guidance), construction of the project would generate a maximum of about 16.5 MT of CO_2e per year.

Table 5 Estimated Construction GHG Emissions

Year	Project Emissions (MT/yr CO_2e)
2022	151.4
2023	344.7
Total	496.1
Total Amortized over 30 Years	16.5

See Appendix A for CalEEMod worksheets.

Table 6 summarizes the project's operational GHG emissions, and its combined construction and operational emissions. Once construction activities are complete, the only indirect source of GHG emissions associated with the project would be from customers and employees traveling to and from the site (mobile sources). Indirect emissions are included with direct emissions for analysis of GHG impacts. Direct GHG emission sources include Area (painting, landscaping), Energy (natural gas usage), Waste, and Water. A breakdown of emissions by source type is available in the CalEEMod modeling worksheets in Appendix A of this report.

The project's annual operational emissions, from both mobile and other sources, would total approximately 859 MT of CO_2e. As shown in Table 6, the increase in annual emissions from both construction and operation of the proposed project would total approximately 876 MT of CO_2e. These emissions would not exceed the 3,000 MT of CO_2e per year threshold, and the project's GHG impacts would be less than significant. Because of its less than significant GHG impacts and the project site's distance from the ocean and wildfire hazard areas, the project would not substantially contribute to or be subject to potential secondary effects of climate change such as sea level rise or increase fire hazard. Impacts related to wildfire are discussed in further detail in Section 19, *Wildfire*. Therefore, project impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

Table 6 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2e in metric tons)
Construction	17
Operational	
Area	<1
Energy	206
Solid Waste	97
Mobile	378
Water	176
Total Operational	859
Combined Annual GHG Emissions	**876**

See Appendix A for CalEEMod worksheets. Some number may not add up due to rounding.

b. 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 the state goal of reducing greenhouse gas emissions in California?

As discussed above under *Regional Regulations*, the SCAG RTP/SCS and Oxnard 2030 General Plan establish strategies and policies to reduce regional GHG emissions. As shown in Section 14, *Population, Education and Housing*, the proposed project would not cause Oxnard to exceed regional growth projections for employment and population on which the SCAG RTP/SCS is based, and the project therefore does not conflict with the SCAG RTP/SCS in terms of population or employment growth. Additionally, the SCAG 2020 RTP/SCS provides land use and transportation strategies to reduce regional GHG emissions. The VCAPCD and the City of Oxnard have not adopted plans or policies related to GHG emission reductions.

Specific land use objectives identified in the SCAG 2020 RTP/SCS include:

- **Reflect the changing population and demands** - The SCAG region, home to about 19 million people in 2020, currently contains 6 million households and 8 million jobs. By 2045, the Plan projects these figures will increase by 3.5 million people (SCAG 2020). High Quality Transit Areas (HQTAs) will account for three percent of regional total land but will accommodate 64 percent and 74 percent of future household and employment growth, respectively, between 2016 and 2045. The 2020 RTP/SCS land use pattern contains sufficient residential capacity to accommodate the region's future growth, including the eight-year regional housing need. The land use pattern also encourages improvement in the jobs-housing balance.
- **Focus new growth around transit** - The 2020 RTP/SCS land use pattern reinforces the trend of focusing growth in the region's HQTAs. Concentrating housing and transit also concentrates roadway repair investments, leverages transit and active transportation investments, reduces regional life cycle infrastructure costs, improves accessibility, avoids greenfield development, and has the potential to improve public health and housing affordability. HQTAs provide households with alternative modes of transport that can reduce vehicle miles traveled (VMT) and GHG emissions.

- **Plan for growth around livable corridors** - The Livable Corridors strategy seeks to revitalize commercial strips through integrated transportation and land use planning that results in increased economic activity and improved mobility options. From a land use perspective, Livable Corridors strategies include a special emphasis on fostering collaboration between neighboring jurisdictions to encourage better planning for various land uses, corridor branding, roadway improvements and focusing retail into attractive nodes along a corridor.
- **Provide more options for short trips** - Thirty-eight percent of all trips in the SCAG region are less than three miles. The 2020 RTP/SCS provides strategies to promote the use of active transport for short trips, including implementation of sidewalks and local bikeways. Neighborhood Mobility Areas are meant to reduce short trips in a suburban setting.
- **Preserve our existing system** - Southern California's transportation system is becoming increasingly compromised by decades of underinvestment in maintaining and preserving infrastructure. These investments have not kept pace with the demands placed on the system, and the quality of many roads, highways, bridges, transit, and bicycle and pedestrian facilities are continuing to deteriorate. Unfortunately, the longer they deteriorate, the more expensive they will be to fix in the future. Even worse, deficient conditions compromise the safety of users throughout the network. For all of these reasons, system preservation and achieving a state of good repair are top priorities of the 2020 RTP/SCS.
- **Transit** - Looking toward 2045, the 2020 RTP/SCS maintains a significant investment in public transportation across all transit modes and calls for new household and employment growth to be targeted in areas well-served by public transportation to maximize the improvements called for in the Plan.
- **Active Transportation** - The 2020 RTP/SCS includes $22.5 billion for active transportation improvements. The Active Transportation portion of the 2020 Plan updates the Active Transportation portion of the 2016 Plan, which has goals for improving safety, increasing active transportation usage and friendliness, and encouraging local active transportation plans. It proposes strategies to further develop the regional bikeway network, assuming all local active transportation plans will be implemented, and dedicates resources to maintain and repair thousands of miles of dilapidated sidewalks. To accommodate the growth in walking, biking and other forms of active transportation regionally, the 2020 Active Transportation Plan also considers new strategies and approaches beyond those proposed in 2016.

The proposed project would provide commercial development along North Oxnard Boulevard. North Oxnard Boulevard provides access to downtown Oxnard, and access to U.S. Highway 101 for residential developments west of the project site. The project site is located within walking distance of the following Gold Coast Transit bus stops: the Oxnard and Vineyard stop (0.28 mile) and the Esplanade and Spur stop (0.51 mile), which are served by Gold Coast Routes 6 and 15. Because it would provide a local-serving commercial use and local employment opportunities on an infill development site with good access to transit and nearby residences, the project fulfills several land use objectives of the SCAG RTP/SCS, including reflecting changing population and demands, providing more options for shorter trips, and planning for and focusing new growth around livable transportation corridors.

Additionally, the project would not conflict with Oxnard 2030 General Plan Goals and Policies, including those to be included in the future Climate Action and Adaptation Plan, because these goals and policies include the implementation of future sustainability programs to promote sustainable practices and would therefore not directly relate to project implementation. These policies include: Policy SC-1.3 Develop a Climate Action and Adaptation Plan, Policy SC-3.4 Set Targets for Zero-

Emission Vehicles, and Policy SC-3.9 Promote Voluntary Incentive Programs. As explained above, the project would not conflict with regional and local plans and policies adopted for the purpose of reducing GHG emissions. Therefore, project impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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6 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of an historical resource as defined in CEQA Guidelines Section 15064.5?	□	□	□	■
b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to State CEQA Guidelines Section 15064.5?	□	■	□	□
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	□	■	□	□
d. Disturb any human remains, including those interred outside of formal cemeteries?	□	□	■	□

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

The proposed project includes the renovation of existing structures and repaving of asphalt surfaces on a currently developed site. The City of Oxnard contains a number of historic buildings and points of interest, including 18 City of Oxnard Landmarks and two Ventura County Points of Interest. Table 5-3 and 5-4 of the General Plan Background Report provide lists of these sites, which do not include the project site itself nor any buildings or sites adjacent to the project site (City of Oxnard 2006). Therefore, the project would have no impact on historical resources.

NO IMPACT

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

c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The entire footprint of the project site has been previously disturbed during the construction of the existing buildings and asphalt surfaces, and implementation of the proposed project would not disturb the ground beyond previous activities. Therefore, it is unlikely the project would have any impact related to disturbance of archaeological resources or paleontological resources. Potential project impacts to tribal cultural resources are further discussed in Section 17, *Tribal Cultural Resources* of this Initial Study.

Although no archaeological resources or paleontological resources are known to exist within the project site, unanticipated discoveries are a possibility during ground disturbance activities. Impacts to unknown archaeological resources or paleontological resources would be potentially significant and mitigation measures would be required. Implementation of Mitigation Measures CR-1 would reduce potential impacts to unknown archaeological resources and paleontological resources to a less than significant level.

Mitigation Measure

CR-1 Unanticipated Archaeological or Paleontological Discoveries

Prior to the issuance of a grading permit, the developer shall note on the plans for review and approval by the City Engineer that if historic, cultural or paleontological resources are encountered during site grading or other site work, all such work shall be halted immediately within 50 feet of discovery and the developer shall immediately notify the Planning Division of the discovery. In such case, the developer shall be required, at its own expense, to retain the services of a qualified archaeologist (or paleontologist, if it is a fossil discovery) for the purpose of recording, protecting, or curating the discovery as appropriate. The archaeologist or paleontologist shall be required to submit to the Planning Division, for review and approval, a report of the findings and method of curation or protection of the resources. Further grading or site work within 50 feet of discovery shall not be allowed until the preceding work has occurred.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The project would include ground disturbing activities. Therefore, the potential for finding human remains would not be precluded. While no cemeteries are known to exist within the project site, the project is required to adhere to State regulations regarding the unanticipated discovery of human remains. The discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states no further disturbance shall occur until the County coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County coroner would be notified immediately. If the human remains are determined to be prehistoric, the County coroner would notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). The MLD would complete the inspection of the site within 48 hours of being granted access to the site. With adherence to existing regulations, project impacts to human remains would be less than significant.

LESS THAN SIGNIFICANT IMPACT

7 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	□	□	■	□
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	□	□	□	■

Electricity and Natural Gas

According to the California Energy Commission (CEC) California used 272,576 gigawatt-hours (GWh) of electricity in 2020, of which 33 percent were from renewable resources (CEC 2020d). The project site would be provided electricity by Southern California Edison (SCE) and natural gas by Southern California Gas Company (SCG). Table 7 and Table 8 show electricity and natural gas consumption by sector and in total for SCE and SCG.

Table 7 Electricity Consumption in the SCE Service Area in 2020

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Streetlight	Total Usage
3,111.6	28,799.6	4,449.4	12,449.5	1,821.9	32,475.1	425.5	83,532.6

Notes: All usage expressed in GWh

Source: CEC 2020a

Table 8 Natural Gas Consumption in SCG Service Area in 2020

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Total Usage
74.4	801.6	87.9	1,615.6	226.2	2,425.8	5,231.5

Notes: All usage expressed in MMThm

Source: CEC 2020c

Petroleum

According to the U.S. Energy Information Administration (EIA), energy consumed by the transportation sector accounts for roughly 39.4 percent of California's energy demand, amounting to approximately 3,073.3 trillion Btu in 2019 (EIA 2019a). Petroleum-based fuels are used for approximately 98.4 percent of the state's transportation activity (EIA 2019b). Most gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet state-specific

formulations required by the CARB. California's transportation sector, including on-road and rail transportation, consumed approximately 662 million barrels of petroleum fuels in 2019 (EIA 2021).

Approximately 294 million gallons of fuel were consumed in Ventura County in 2020, of which approximately 262 million gallons were gasoline and approximately 32 million gallons were diesel fuel (CEC 2022). This equates to approximately 805,479 gallons of fuel per day. Oxnard consumed approximately 85 million gallons of gasoline in 2018 (CEC 2022). This equates to approximately 232,876 gallons of fuel per day or 1.1 gallons of fuel per person per day, based on a 2018 citywide population of 205,883 people as determined by the California Department of Finance (DOF 2021).

Impact Analysis

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction Energy Demand

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site and construction worker travel to and from the project site. The project would require pavement and asphalt installation; architectural coating; and landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod used to estimate construction air emissions for Section 3, *Air Quality* and Section 5, *Climate Change and Greenhouse Gas Emissions* (Appendix A). Table 9 presents the estimated construction phase energy consumption, indicating construction equipment and vendor trips would consume approximately 44,861 gallons of diesel fuel over the project construction period. Worker trips would consume approximately 10,629 gallons of fuel over the combined phases of project construction.

These construction energy estimates represent a conservative estimate because the construction equipment used in each phase of construction was assumed to be operating every day of construction. Construction equipment would be maintained to all applicable standards, and construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. It is also reasonable to assume contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Table 9 Estimated Fuel Consumption during Construction

Fuel Type	Gallons of Fuel	MMBtu
Diesel Fuel (Construction Equipment and Vendors)	44,861	5,718
Other Petroleum Fuel (Worker Trips)	10,629	1,167
Total	**55,491**	**6,885**

See Appendix B for energy calculation sheets. Totals may not add up due to rounding.

Operational Energy Demand

Operation of the project would increase area energy demand from greater electricity, natural gas, and gasoline consumption at a currently developed but mostly vacant site. Natural gas and electricity would be used for heating and cooling systems, lighting, water use, and the overall operation of the warehouse/self-storage and retail land uses. Gasoline consumption would be attributed to the trips generated from employees and customers of the warehouse/self-storage and retail land uses. The estimated number of average daily trips associated with the project was used to determine the energy consumption associated with fuel use from operation of the project. The majority of project-related fuel consumption would be from motor vehicles traveling to and from the project site. According to the CalEEMod calculations, the project would result in 1,119,018 annual VMT resulting from the 403 average daily trips during the week generated by the project during operation (Appendix A). Table 10 shows the estimated total annual fuel consumption of the project using the estimated trip generation and VMT with the assumed vehicle fleet mix (Appendix A). One gallon of gasoline is equivalent to approximately 109,786 Btu (CARB 2015), while one gallon of diesel is equivalent to approximately 127,460 Btu (Schremp 2017).

As shown in Table 10, the project would consume approximately 57,967 gallons of fuel, or 6,516 MMBtu, each year for transportation uses from project operation.

Table 10 Estimated Project Annual Transportation Energy Consumption

Land Use[1]	Percent of Vehicle Trips[2]	Annual Vehicle Miles Traveled[3]	Average Fuel Economy (miles/gallon)[4]	Total Annual Fuel Consumption (gallons)	Total Fuel Consumption (MMBtu)[6]
Passenger Cars	60.5	676,793	24.1	28,083	3,083
Light/Medium Trucks	33.2	371,364	17.6	21,100	2,316
Heavy Trucks/Other	5.8	64,861	7.5	8,648	1,102
Motorcycles	0.5	6,001	44.0[5]	136	15
Total	**100.0**	**1,119,018**	**–**	**57,967**	**6,516**

[1] Vehicle classes provided in CalEEMod do not correspond exactly to vehicle classes in DOT fuel consumption data, except for motorcycles. Therefore, it was assumed that passenger cars correspond to the light-duty, short-base vehicle class, light/medium trucks correspond to the light-duty long-base vehicle class, and heavy trucks/other correspond to the single unit, 2-axle 6-tire or more class.

[2] Percent of vehicle trips from Table 4.4 "Fleet Mix" CalEEMod output (see Appendix A).

[3] Mitigated annual VMT found in Table 4.2 "Trip Summary Information" in CalEEMod output (see Appendix A).

[4,5] National Transportation Statistics: United States Department of Transportation, Bureau of Transportation Statistics, 2021.

[6] CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for vehicle classes specified above (see *Energy Unit Conversion Sheet* in Appendix B).

Notes: Totals may not add up due to rounding.

Operation of the project would consume approximately 0.91 GWh of electricity per year (electricity use is provided in the CalEEMod output of Appendix A). The project's electricity demand would be served by SCE, which provided 80,913 GWh of electricity in 2019; therefore, SCE would have sufficient supplies for the project. Estimated natural gas consumption for the project would be 8,961 Therms, or 0.009 MMthm per year (natural gas use is provided in the CalEEMod output of Appendix A). The project's natural gas demand would be serviced by SCG, which provided 5,425 MMthm per year in 2019 therefore, SCG would have sufficient supplies for the project. The project would comply with all standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation**.** California's CAL Green standards (California Code of Regulations, Title 24, Part 11) (California

Building Standards Commission 2022) require implementation of energy efficient light fixtures and building materials into the design of new construction projects, projects that include building additions of 1,000 square feet or greater, and/or building alterations with a permit valuation of $200,000 or above (for occupancies within the authority of the California Building Standards Commission). Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings, additions to existing buildings, and alterations to existing buildings to meet energy performance standards set by the Energy Commission including indoor air quality requirements. As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. For example, according to the CEC, residences built with the 2019 standards will use about seven percent less energy due to energy efficiency measures versus those built under the 2016 standards, or 53 percent less energy with rooftop solar, and nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades (CEC 2018). Furthermore, the project would further reduce its use of nonrenewable energy resources because the electricity generated by renewable resources provided by SCE continues to increase to comply with State requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

In conclusion, construction of the project would be temporary and typical of similar projects, and would not result in wasteful, inefficient, or unnecessary consumption of energy. Operation of the project would increase consumption of fuel, natural gas, and electricity compared to existing conditions of the developed but mostly vacant site; however, the increase would be in conformance with the latest version of California's Green Building Standards Code and the Building Energy Efficiency Standards. In addition, SCE and SCG have sufficient supplies to serve the project. Therefore, the project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The City of Oxnard adopted the Energy Action Plan (EAP) in 2013 as a component of the Oxnard Climate Action and Adaptation Plan. The purpose of the EAP is to establish a net energy consumption reduction target and identify and scope programs to achieve the target, for the overall goal of reducing GHG emissions to meet AB-32 requirements. The EAP focuses primarily on electricity efficiency and conservation, but also includes natural gas and renewable energy production strategies. Successful implementation of the EAP depends on the implementation of its programs and policies.

The project's consistency with the EAP is determined by assessing if the project conflicts with applicable programs or policies outlined within the EAP. Table 11 provides an assessment of the proposed project's consistency with policies and initiatives that existed before implementation of the EAP. Programs created by the EAP include expanding outreach efforts (C-1, C-2, C-12, and C-17), promoting renewable energy and electric vehicle infrastructure (C-6, C-7, C-15, and C-16), and promoting sustainable building through financing mechanisms and expedited permitting (C-4 and C-11). The new EAP programs provide guidance for new construction projects and guidance for City programs, and do not apply directly to the proposed project; therefore, the proposed project would

not interfere with the initiatives outlined in the EAP and would have no impact to implementation of the EAP.

NO IMPACT

Table 11 Consistency with Applicable Existing Policies and Initiatives

Initiative	Project Consistency
2030 General Plan Goals and Policies	
SC-3.9 Promote Voluntary Incentive Programs ICS-11.6 Water Conservation ICS-11.7 Water Wise Landscapes	**Consistent.** The proposed project would not interfere with promotion of voluntary incentive programs. The project would include low flow water fixtures as required by Title 20 to promote water conservation in indoor water use. Additionally, the project would utilize lower water intensity landscaping.
City of Oxnard 2021-2029 Housing Element	
a. Promote Energy Reduction Programs b. Power Generation Goal	**Consistent.** The proposed project would not interfere with implementation of energy reduction programs; electricity use would meet Title 24 standards. The proposed project would not interfere with Oxnard's goals for ensuring energy sources are renewably sourced.
Adoption of Mandatory Water Conservation Measures (Oxnard City Code)	
a. Limits on watering hours b. No outdoor irrigation during rain c. Limits on watering duration d. No run-off e. No use of water to clean surfaces	**Consistent.** The proposed project would adhere to all water use restrictions outlined in the Oxnard City Code.

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8 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	□	□	■	□
2. Strong seismic groundshaking that cannot be addressed through compliance with standard Code requirements?	□	□	■	□
b. 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?	□	□	■	□
c. Be located on expansive soil, creating substantial risks to life or property that cannot be addressed through compliance with standard Code requirements?	□	□	■	□
d. Expose people or structures to inundation by seiche or tsunami?	□	□	□	■
e. Rely on dredging or other maintenance activity by another agency that is not guaranteed to continue?	□	□	□	■

a.1. 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?

a.2. 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?

b. 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?

c. 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?

According to the California Department of Conservation California Earthquake Hazard Zone Application, the project site does not lie within an Alquist-Priolo Fault Zone and is not at risk of adverse effects resulting from fault rupture (California Department of Conservation 2019). The faults nearest the project site include the Ventura Fault, 2.7 miles to the northwest, and the Camarillo Fault, 3.8 miles to the east. The proximity to these faults does introduce the risk of ground shaking at the project site. Furthermore, the majority of Oxnard, including the project site, is designated as a liquefaction risk zone. The proposed project includes structural modifications to the existing structures on site which would bring the warehouses up to date with current California Building Code standards designed to reduce risk from seismic hazards (O'Neal & Courtland 2018). Additionally, the General Plan Background Report indicates the planning area is at low risk of landslides due to the flat nature of the topography, and Figure 5-12 of that report shows the project site has low susceptibility to soil erosion (City of Oxnard 2006). The proposed project would not include significant modification of the project site and would not introduce further risk from seismic or unstable soil hazards. Compliance with the California Building Code would reduce risk associated with seismic hazards characteristic of the planning area. Therefore, the proposed project would not introduce new potential hazards related to unstable or expansive soils, or introduce new risk related to existing seismic hazards, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project expose people or structures to inundation by seiche or tsunami?

The proposed project site does not exist in a flood hazard, tsunami or seiche zone. According to the General Plan Background Report, Ventura County has a "remote risk" of tsunami impacts, and the projected tsunami impact area extends one mile inland from the shoreline (City of Oxnard 2006). The project site is approximately five miles from the shoreline and is therefore not at risk of being impacted by a tsunami. Additionally, the project site does not lie within a 100-year flood zone and is not located adjacent to a standing body of water; therefore, the project is not at risk of being impacted by a seiche or at high risk of flooding (FEMA 2010). The project would not be at risk of release of pollutants due to inundation and would therefore have no impact.

NO IMPACT

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

The proposed project would not rely on dredging or other maintenance activity by another agency that is not guaranteed to continue. Therefore, there would be no project impact.

NO IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	□	□	■	□
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment?	□	□	■	□
c. 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?	□	□	□	■
d. 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?	□	□	□	■
e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	□	□	□	■

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment?

Construction and operation of the project would not involve the use and transport of hazardous materials outside of those used in operation of typical construction equipment or typical cleaning and landscape materials. Materials used for construction would be transported to and within the project site for regular construction activities, and may include diesel fuel, lubricants, adhesives,

cleaning solutions, and chemical toilets. The number of hazardous materials used during project operation would not be substantial and would not pose a risk to the public or environment. Hazardous materials use and transport during both construction and operation of the project would comply with all pertinent federal, State, and City regulations regarding their storage, on-site use, and off-site disposal. Compliance with the applicable regulations would ensure the project has a less than significant impact

LESS THAN SIGNIFICANT IMPACT

c. 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?

Schools near the project site include Rio Del Norte Elementary School 0.52 mile to the west, Sierra Linda Elementary School 0.57 mile to the southwest, and Pacifica High School 0.74 mile to the south. Therefore, any hazardous materials, substances or waste handled within the project site would not be within 0.25 mile of an existing or proposed school and the project would have no impact.

NO IMPACT

d. 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?

A database search of hazardous material sites did not return any indication the project site or its vicinity contains hazardous materials that would create a significant hazard to the public or the environment. The database search included the following: State Water Resources Control Board Geotracker (State Water Resources Control Board 2022), USEPA Resource Conservation and Recovery Act Info site (USEPA 2022a), USEPA Permit Compliance System and Integrated Compliance Information System (USEPA 2022b), and the Department of Toxic Substance Control EnviroStor Database (Department of Toxic Substance Control 2022). The nearest listed hazardous site is a LUST cleanup site located 0.20 mile south of the project site. However, cleanup of this site has been deemed complete as of 2006. Therefore, the proposed project would have no impact.

NO IMPACT

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

The proposed project would include minor construction and renovation of the currently developed project site and would not modify or block current emergency access routes. Additionally, the project would not introduce a significant volume of new traffic that would interfere with an emergency access route (see Section 16, *Transportation and Circulation*). Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation route, and there would be no impact.

NO IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a violation of any adopted water quality standards or waste discharge requirements?	□	□	□	■
b. Substantially deplete groundwater supplies or interfere substantially 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)?	□	□	□	■
f. 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?	□	□	□	■
g. 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?	□	□	□	■
h. Impede or redirect flood flows such that it would increase on- or off-site flood potential?	□	□	□	■
i. 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?	□	□	□	■
j. Be exposed to a substantial risk related to inundation by seiche, tsunami, or mudflow?	□	□	□	■

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

The project site is an 8.865 acre, currently developed site in an urban area with impervious asphalt surfaces that would be repaved, and structures that would undergo minor modifications. Construction activities would include minor utility installation, paving, and architectural coating, with no significant ground disturbing activities larger than 1 acre. The proposed project is considered redevelopment of the site according to the 2015 Ventura County Technical Guidance Manual for Stormwater Quality Control Measures because there is no net addition or alteration of impervious surfaces. Additionally, the modifications to the impervious asphalt surfaces are considered maintenance according to the Technical Guidance Manual. Therefore, the project would not be required to implement stormwater control measures for project operation according to the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures (Ventura Countywide Stormwater Quality Management Program 2015). Additionally, the project would not be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity and would not be required to develop a Storm Water Pollution Prevention Plan (California Water Resources Control Board 2022b). Therefore, neither construction nor operation of the project would create a violation of water quality standards or waste discharge requirements or substantially degrade surface or water quality and the project would have no impact.

NO IMPACT

b. Would the project substantially deplete groundwater supplies or interfere substantially 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)?

The project site lies atop the Oxnard Aquifer in the Upper Aquifer System of the Oxnard Plain Groundwater Basin. The Oxnard Plain Basin receives natural recharge from nine groundwater basins along the Santa Clara River Basin (City of Oxnard 2006). The proposed project would not modify the project site in a manner capable of impacting groundwater supplies, as it would not interfere with the Santa Clara River or water flow in the related aquifers because it would not increase impervious surfaces or modify stormwater runoff. The project's water use would include those typical of a non-manufacturing, commercial warehouse with ornamental landscaping, and would not substantially decrease groundwater supplies. Therefore, the project would have no impact on groundwater supplies or management.

NO IMPACT

c. 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?

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

Based on the Hydrologic and Hydraulic Report/ Stormwater Quality Report prepared by CCE Design Associates Inc. (Appendix C), development of the project site is in accordance with City of Oxnard and County of Ventura criteria for stormwater quality and quantity. The on-site runoff is collected

and treated pursuant to Ventura County MS4 standards. Development of the project site would not have adverse impact on downstream storm drain facilities. While the analysis of off-site systems is beyond the scope of this report, according to the Hydrologic and Hydraulic Report/ Stormwater Quality Report (Appendix C), the project improves upon the original design, as it meets the full MS4 compliance standards for the site, including effective impervious area (EIA) standards and standards for developed pervious surfaces (CCE Design Associates Inc. 2021). Additionally, the grading design and proposed drainage system are designed in a manner to convey stormwater flows away from structures to provide protection from flooding pursuant to City of Oxnard, County of Ventura, and FEMA requirements. All buildings will be constructed outside of 100-year storm event flood limits (FEMA 2010).

The project site is currently developed with a large commercial structure and paved surfaces. These existing buildings and paved surfaces make up 96 percent of the site footprint. After the development of the proposed project, the buildings and paved surfaces would make up 90 percent of the site footprint. There are no existing streams, rivers, or other types of natural drainage features on the project site. The project would include repaving of asphalt surfaces and renovation of existing structures. This would not increase the existing coverage of impervious surfaces or significantly modify drainage patterns in a way that would increase surface runoff or risk of flooding on-or off-site. Therefore, the project would not modify existing drainage patterns through alteration of a stream or river, or increase the coverage of impervious surfaces, and would have no impact on existing hydrology.

NO IMPACT

d. 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?

f. 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?

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

The project site does not exist in a flood hazard, tsunami or seiche zone. According to the General Plan Background Report, Ventura County has a “remote risk” of tsunami impacts, and the projected tsunami impact area extends one mile inland from the shoreline (City of Oxnard 2006). The project site is approximately five miles from the shoreline and is therefore not at risk of being impacted by a tsunami. Additionally, the project site does not lie within a 100-year flood zone and is not located adjacent to a standing body of water; therefore, the project is not at risk of being impacted by a seiche or at high risk of flooding (FEMA 2010). In conclusion, the project would not be at risk of any of these flooding or inundation hazards, and there would be no impact.

NO IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. 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?	□	□	■	□
b. Involve land uses that are not allowed under any applicable airport land use compatibility plan?	□	□	■	□
c. Conflict with an applicable habitat conservation plan or natural community conservation plan?	□	□	□	■
d. Physically divide an established community?	□	□	□	■

a. 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?

b. Would the project involve land uses that are not allowed under any applicable airport land use compatibility plan?

The proposed project consists of a self-storage warehouse with equipment rental, and storage for 46 RVs. The site is designated under the 2030 General Plan as Commercial General, and is zoned C-2-PD, General Commercial-Planned Development. The Oxnard City Code does not permit self-storage warehouses on properties with this zoning designation unless a Special Use Permit is obtained (Section 16-138), which requires approval by the Planning Commission (see Section 10, *Required Discretionary Approvals*, for a list of required discretionary approvals for the proposed project). Upon approval of the Special Use Permit, the project would not conflict with the site's zoning designation.

The following 2030 General Plan Community Development chapter goals and policies are relevant to the proposed project.

Goal CD-1: A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.

Policy CD-1.3: Promote the renovation and adaptive reuse of existing buildings, especially to mixed use if appropriate, in order to provide commercial convenience shopping in established neighborhoods.

Goal CD-4: Commercial uses compatible with surrounding land uses to meet the present and future needs of Oxnard residents, employees, and visitors.

Policy CD-4.2: Encourage upgrading, beautification, revitalization, and appropriate reuse of existing commercial areas and shopping centers and, especially within redevelopment project areas, continue to develop and implement programs that link commercial areas with their adjoining neighborhoods and increase overall jobs, sales and property valuation.

Policy CD-4.4: Require that older commercial development upgrade/improve landscaping and architecture, if warranted, during discretionary review opportunities.

Goal CD-9: A high quality visual image and perception of the City.

Policy CD-9.2: As part of the City's redevelopment programs and planning, promote the revitalization of residential, commercial, and industrial properties that are deteriorated or detract from the visual quality of the City.

The proposed project would be consistent with Goal CD-1 and Policy CD-1.3 as it would promote the renovation and adaptive reuse of existing buildings and expand a commercial use within an established neighborhood. Furthermore, as discussed in Section 1, *Aesthetics and Urban Design*, the proposed project would be consistent with Goals CD-4, CD-9, and Policies CD-4.2, CD-4.4, and CD-9.2 because it would upgrade, beautify, revitalize, and appropriately reuse an existing commercial area, consistent with applicable zoning regulations relating to visual character and quality.

The proposed project would conform to the applicable zoning ordinances outlined in the Oxnard City Code for the General Commercial land use. The existing structures include a 35-foot tall, 85,103 square foot warehouse abutting a single story, 66,987 square foot warehouse to the south. Based on the plan set elevations included in Section 2*, Project Description*, the height of the building would slightly exceed 35 feet in some places. However, in accordance with Section 16-137, additional stories may be approved via a special use permit. The front yard setback requirement is 10 feet, but the development has provided a 55-foot setback. The rear yard is required to be 15 feet and is provided in many areas; however, at the northeast corner of the property a variance (Variance 277) was issued in 1970 by the Oxnard City Council to allow a zero rear yard setback at this corner. This was considered appropriate as the east side of the property is curved as it abuts a railroad right of way. Compliance with the Oxnard City Code and General Plan would ensure consistency with applicable land use plans, policies and regulations adopted to avoid environmental effects. Furthermore, the project site is not located within an airport land use plan area. Therefore, project impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?

The project site is in an urban area as designated by the General Plan Background Report and is zoned for general commercial land use (City of Oxnard 2006). Additionally, as explained in Section 4, *Biological Resources*, it would not substantially impact any native habitat or natural community. Therefore, the proposed project would not conflict with an adopted local, regional, or state habitat conservation plan.

NO IMPACT

d. Would the project physically divide an established community?

The proposed project includes the renovation of a currently developed site in an urban area surrounded by commercial and residential land uses. See Section 9, *Surrounding Land Uses and Setting*, for further details regarding adjacent development and surrounding uses. The project would not physically divide the community because the project does not include construction of a wall, roadway, or other component which would divide the existing community. Therefore, the project would have no impacts related to the physical division of an existing community.

NO IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource of value to the region or state?	□	□	□	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated in the 2030 General Plan, specific plan or other land use plan?	□	□	□	■

a. Would the project result in the loss of availability of a known mineral resource of value to the region or state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated in the 2030 General Plan, specific plan or other land use plan?

According to Figure 5-15 of the General Plan Background Report, the project site lies within a Non-Designated Mineral Resource Zone-2 (MRZ-2) as classified by the California Mining and Geology Board under the California Surface Mining and Reclamation Act of 1975. The MRZ-2 classification indicates a high likelihood that significant mineral deposits are present. According to the Ventura County Mineral Resources Management Plan, regions classified as MRZ-2 are to be established as certain land use categories with buffer zones that would allow the timely extraction of mineral resources, including Very Low Density Residential, Extensive Industrial, Recreation/Open Space, and Agriculture (City of Oxnard 2006). Since the site is under a Non-Designated MRZ-2 classification, land use designations do not fall under the Ventura County Mineral Resources Management Plan requirements and do not need to preserve mineral extraction access. Additionally, according to the Oxnard City Code Section 16-135 and 16-136, the General Commercial designation for which the project site is zoned does not permit mining or oil extraction activities. Therefore, the proposed project would have no impact on access to mineral resources.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generate or expose persons to noise levels in excess of standards established in the Oxnard 2030 General Plan or Noise Ordinance, or applicable standards of other agencies?	□	□	■	□
b. Generate or expose persons to excessive groundborne vibration or groundborne noise levels?	□	□	■	□
c. Generate a substantial temporary or periodic increase in ambient noise in the project vicinity above levels existing without the project?	□	□	■	□
d. Generate a substantial permanent increase in ambient noise in the project vicinity above levels existing without the project?	□	□	■	□
e. 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?	□	□	□	■
f. Expose non-human species to excessive noise?	□	□	■	□

Noise

The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called "A-weighting" is used to adjust actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz, thus filtering out noise frequencies that are not audible to the human ear. A-weighting approximates the frequency response of the average young ear when listening to most ordinary everyday sounds. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the "A-weighted" levels of those sounds. Therefore, the A-weighted noise scale is used for measurements and standards involving

the human perception of noise. In this analysis, all noise levels are A-weighted, and "dBA" is understood to identify the A-weighted decibel.

Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that an increase (or decrease) of 5 dBA (8 times [or one eighth] the sound energy) is readily perceptible; and that an increase (or decrease) of 10 dBA (10.5 times [or approximately one tenth] the sound energy) sounds twice (or half) as loud (Crocker 2007).

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this analysis are the one-hour equivalent noise level (L_{eq}) and the community noise equivalent level (CNEL).

- The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007).
- The CNEL is a 24-hour equivalent sound level with an additional 5 dBA penalty to noise occurring during evening hours, between 7:00 p.m. and 10:00 p.m., and an additional 10 dBA penalty to noise occurring during the night, between 10:00 p.m. and 7:00 a.m., to account for the added sensitivity of humans to noise during these hours (Caltrans 2013). Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 70+ CNEL range.

Propagation

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. The way sound reduces with distance depends on factors such as the type of source (e.g., point or line), the path the sound will travel, site conditions, and obstructions. Sound levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Sound from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013).

Vibration

Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from

traffic is rarely perceptible. Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The vibration frequency of an object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body is from a low of less than 1 Hz up to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz). Vibration may also damage infrastructure when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Descriptors

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second (in./sec.). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Response to Vibration

Vibration associated with construction of the project has the potential to be an annoyance to nearby land uses. Caltrans has developed limits for the assessment of vibrations from transportation and construction sources. The Caltrans vibration limits are reflective of standard practice for analyzing vibration impacts on structures. The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans 2020) identifies impact criteria for buildings and criteria for human annoyances from transient and continuous/frequent sources: Table 12 presents the impact criteria for buildings, and Table 13 presents the criteria for humans.

Table 12 Vibration Damage Potential

Building Type	Maximum PPV (in./sec.)
Historic sites and other critical locations	0.1
Historic and some old buildings	0.5
Older residential structures	0.5
New residential structures	1.0
Modern industrial/commercial buildings	2.0

PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020

Table 13 Vibration Annoyance Potential

	Maximum PPV (in./sec.)	
Human Response	**Transient Sources**	**Continuous/Frequent Intermittent Sources**
Severe/disturbing	2.00	0.70
Strongly perceptible	0.90	0.10
Distinctly perceptible	0.240	0.035
Barely perceptible	0.035	0.012

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity; in./sec. = inches per second

Source: Caltrans 2020

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Some land uses are considered more sensitive to ambient noise and ground-borne vibration levels than others. People in residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, long-term care and mental care facilities, natural areas, parks, and outdoor recreation areas are generally more sensitive to noise than are people at commercial and industrial establishments.

The noise-sensitive receivers nearest to the project site are single- and multi-family residences 220 feet to the west along Oxnard Boulevard.

Regulatory Framework

The Safety and Hazards Element of the City of Oxnard's General Plan defines issues, goals, policies, and implementation measures related to noise conditions in the city. The specific goals and policies of the General Plan Safety and Hazards Element that are relevant to the project are as follows:

Goal SH-6: Consideration of noise levels and impacts in the land use planning and development process.

Policy SH-6.2: Continue to limit construction activities to the hours of 7 am to 7 pm, Monday through Saturday. No construction shall occur after hours, on Sundays, or national holidays without permission from the City.

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

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

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

f. Would the project expose non-human species to excessive noise?

The primary off-site noise source in the project area is motor vehicles[3]. Motor vehicle noise is a concern because it is characterized by a high number of individual events that often create sustained noise levels. Ambient noise levels are expected to be highest during the morning and afternoon rush hours unless congestion slows speeds substantially. To determine ambient noise levels in the project area, the Oxnard General Plan Background Report was reviewed. Based on the Community Noise Measurement Summary in the *Safety and Hazard* element, the project site is along Oxnard Boulevard, north of Roderick Avenue, which has a morning noise level of 71.3 dBA (City of Oxnard 2006).

Primary noise generation from the proposed project that would impact sensitive receivers would be from vehicular traffic from customers and employees entering and exiting the project site on Oxnard Boulevard. For a perceptible noise increase of at least 3 dBA to occur, the proposed project would need to result in a doubling of traffic. Daily traffic counts collected in 2008 reported 28,696 vehicles per day traveled along Oxnard Boulevard in the vicinity of the project site (IBI Group 2008). By estimating peak hour traffic counts as 10 percent of average daily traffic, approximately 2,870 vehicles travel along Oxnard Boulevard during peak hours. The Traffic Study Update conducted by raSmith (Appendix D) concludes the project would generate a total of 567 weekday daily vehicle trips on the roadways surrounding the project site, which would increase existing traffic volumes by two percent during peak hours on Oxnard Boulevard. This would not result in a perceptible increase in noise levels in the project site vicinity. Therefore, the project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

b. Would the project generate or expose persons to excessive groundborne vibration or groundborne noise levels?

Groundborne vibration and noise levels are typically generated by heavy equipment and hauling trucks during project construction. The proposed project would include minimal construction activities necessitating the use of heavy equipment or hauling trucks for extended durations. Paving of asphalt surfaces would require hauling trucks and pavers, and renovation of the building would potentially require some heavy equipment for short durations. As the nearest sensitive receivers are approximately 220 feet to the west of the project site, vibration generated by heavy equipment is not likely to cause significant impacts. Additionally, project operation does not include use of heavy machinery or equipment that would generate significant vibration. Therefore, the project would not

[3] Noise and vibration are produced by train traffic on the railway adjacent to the project site, but only intermittently, and the proposed project would not affect train traffic or noise and vibration levels from the adjacent railway.

generate excessive groundborne noise or vibration that would affect sensitive receivers and would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

e. 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?

As discussed in Section 9, *Hazards and Hazardous Materials*, the project site is not within an airport land use plan or within two miles of a public or private airport. The closest airport is Oxnard Airport, approximately 2.25 miles southwest of the project site. Naval Base, Ventura County is approximately 10 miles to the southeast. Because the project would not expose future residents or workers to excessive aviation-related noise levels, there would be no impact.

NO IMPACT

14 Population, Education, and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Involve a General Plan amendment that could result in an increase in population over that projected in the 2030 General Plan that may result in one or more significant physical environmental effects?	□	□	□	■
b. Induce substantial growth on the project site or surrounding area, resulting in one or more significant physical environmental effects?	□	□	□	■
c. 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?	□	□	□	■
d. 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?	□	□	□	■
e. Cause an increase in enrollment at local public schools that would exceed capacity and necessitate the construction of new or expanded facilities?	□	□	□	■
f. Directly or indirect interfere with the operation of an existing or planned school?	□	□	□	■

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

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

c. 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?

d. 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 proposed project includes a self-storage warehouse and other retail and warehouse components that would generate only a small amount of new employment opportunities, and includes no new residential construction, or demolition of existing housing. As no industry specific reviews of self-storage or U-Haul facility employee generation rates are currently available, a search of internet forums for self-storage owners indicates roughly three full time employees are needed to operate a 300-to-500-unit self-storage warehouse (Self Storage Talk 2015). Extrapolating these figures to the project's 1,874 storage units, this component of the project would generate 19 new jobs, using an employee generation rate of 1 employee per 100 units as a conservative estimate. The tenants of the additional retail and warehouse components are not yet identified; however, employee generation estimates are provided in Table 14 using estimates from a Southern California Survey of employee density for various land uses. Based on these assumptions, it is conservatively estimated the project would generate 54 new jobs.

SCAG estimates the population of Oxnard will increase by 32,100 residents and generate 15,000 new jobs between 2016 and 2045 (SCAG 2020). Even in the unlikely event all the new jobs created by the project were to result in new residents to Oxnard, the project would result in less than one percent of expected growth of both population and employment. Therefore, the project would not result in unplanned population growth or displacement of existing housing, and there would be no impact.

NO IMPACT

Table 14 Employee Generation Assumptions

Land Use Category	Average Employment Density	Proposed Land Uses	Estimated Employee Generation
Other Retail/Svc.	344 sf per employee	5,341 sf	16
Warehouse	814 sf per employee	34,537 sf	19
Self-Storage	100 units per employee	1,874 units	19
Net Increase in Employees	**–**	**–**	**54**

Sources: Self-Storage Talk 2015

e. 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?

f. Would the project directly or indirectly interfere with the operation of an existing or planned school?

The proposed project consists of commercial uses that would not generate many new jobs that would create a significant influx of new residents to the city requiring public services such as schools or parks. Therefore, the proposed project would not create a substantial increase in demand for

public schools, no new or physically altered school facilities would be required, and the project would have no impact related to schools.

NO IMPACT

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15 Public Services and Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. 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?	□	□	□	■
b. 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?	□	□	□	■
c. 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?	□	□	□	■
d. 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?	□	□	□	■

a. 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?

b. 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?

c. 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?

d. 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?

Because, as discussed in Section 14, *Population, Education, and Housing,* the proposed project would only generate an estimated maximum of 54 new employees, it would not generate a population increase that would require an expansion of government services that could cause a significant environmental impact. Although the property is currently mostly vacant, it is within the existing service area for fire and police service and already requires fire and police protection in case of fire or potential criminal activity on the site. Because the proposed project consists of commercial and retail uses, it would not generate many new jobs that would create a significant influx of new residents to the city requiring public services such as schools or parks. Therefore, it would not create a substantial increase in demand for government services, no new or physically altered public service facilities would be required, and the project would have no impact on public services.

As explained above and in Section 14, *Population, Education and Housing*, the proposed project consists of commercial uses that are not expected to generate many new jobs that would create a significant influx of new residents to the city. Consequently, there would be no significantly increased use of or demand for recreational facilities, and expansion of recreational facilities would not be necessary. The project would have no impact on or from recreational facilities.

NO IMPACT

16 Transportation and Circulation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. 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 (LOS) standards?	□	□	■	□
b. Exceed, either individually or cumulatively, an LOS standard established by the Ventura County Congestion Management Program (CMP) for designated roads or highways?	□	□	■	□
c. 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?	□	□	□	■
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	□	□	□	■
e. Result in inadequate emergency access?	□	□	□	■
f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	□	□	■	□

a. 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 (LOS) standards?

A Traffic Study Update was prepared by raSmith (Appendix D) to address the proposed project's potential impacts on traffic and circulation. It estimates the project would generate 567 weekday daily vehicle trips on the roadways surrounding the project site, which would increase existing traffic volumes by two percent during peak hours on Oxnard Boulevard. The Traffic Study assessed

the project's traffic impacts at six nearby intersections, finding the new development would "not create a significant traffic impact to the area intersections." Changes in volume to capacity ratios at the intersections of interest would not exceed Oxnard's maximum allowable difference of 0.02 when comparing traffic conditions with and without the project. Additionally, all intersections are expected to operate at level of service (LOS) ratings of C or better with project buildout, in compliance with the City's intersection LOS standard of LOS C or better (City of Oxnard 2011).

The Traffic Study determined the proposed project would be consistent with the Ventura County General Plan by complying with terms of the "Reciprocal Traffic Mitigation Agreement" between the City of Oxnard and County of Ventura regarding traffic impact fee assessment associated with the development. As described in the Traffic Study, Oxnard Boulevard is included in Ventura County's Congestion Management Plan (CMP) Roadway Network. The CMP sets the minimum acceptable level of service for intersections in the roadway network at LOS E. The Traffic Study shows the LOS at intersections impacted by the proposed project would be LOS C or better. As a result, the proposed project would be consistent with the Ventura County CMP. Therefore, the project would be consistent with local plans and policies regarding the circulation system, and the project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

b. 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?

Section 15064.3, which describes specific considerations for evaluating a project's transportation impacts under CEQA, was recently added to the State CEQA Guidelines. Section 15064.3(b) establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts, shifting away from the use of LOS analysis that evaluates a project's impacts on traffic conditions at nearby roadways and intersections. Section 15064.3(c) states that a lead agency shall be governed by the provisions of Section 15064.3 by July 1, 2020. While the City of Oxnard has not yet established VMT-based criteria for measuring transportation impacts, the proposed project is infill development that would provide commercial services within an existing urban area. Infill development generally reduces VMT compared to greenfield development (new development on lands not previously planned for development) and the project would provide self-storage space in an area where such space is currently lacking, thus reducing the distance local residents would need to travel for this service. The proposed project would therefore not create a substantial increase in VMT or conflict or be inconsistent with CEQA Guidelines section 15064.3(b). As described above in criterion a, it would also be consistent with the Ventura County CMP. This would be a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

c. 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?

d. 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)?

e. Would the project result in inadequate emergency access?

As described in the Traffic Study (Appendix D), the City of Oxnard plans to install a traffic signal at the Oxnard Boulevard intersection with Orchard Place, which would align with the project's proposed primary driveway. The Traffic Study determined the planned intersection geometry would provide sufficient capacity and turn lane storage to accommodate project traffic. The existing driveways for project access would not be impacted during peak project use hours and would also provide sufficient space for U-Haul trucks to safely enter and exit. In addition, the proposed project is not located within an airport land use plan area and would not impact air traffic patterns. Therefore, the project would not increase hazards and the project would have no impact.

The proposed project would not create traffic impacts which would impede access to designated evacuation routes. Additionally, the project driveways are designed to be at least 25 feet across, and able to accommodate access to the project site by emergency access vehicles. Therefore, the project would not increase hazards or result in inadequate emergency access and would have no impact.

NO IMPACT

f. Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The proposed project would not remove or interfere with any bicycle or pedestrian facilities. The project site is located within walking distance of the following Gold Coast Transit bus stops: the Oxnard and Vineyard stop (0.28 mile) and the Esplanade and Spur stop (0.51 mile), which are served by Gold Coast Routes 6 and 15. Furthermore, as discussed above in criterion a, the project would be consistent with the Ventura County CMP. Therefore, the project would be consistent with local plans and policies regarding the circulation system, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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17 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	□	□	□	■
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe.	□	□	□	■

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be adopted or certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American

tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1?

The City of Oxnard lies on the Oxnard Plain, which has a history of occupation by Native Americans dating back as far as 3,500 years ago. The Chumash Indians are known to have inhabited the region from Topanga Canyon northwest to San Luis Obispo. The project site has not been identified by the City of Oxnard as requiring tribal consultation under AB 52, since no Native American tribes have requested consultation with the City under AB 52. Additionally, the proposed project includes repaving of existing asphalt surfaces and renovation of the existing structures on the project site. Therefore, the nature of project implementation would not include significant grading or ground disturbing activities that would potentially uncover tribal resources and there would be no impact.

NO IMPACT

18 Utilities

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Need new or expanded water supply entitlements that are not anticipated in the current Urban Water Management Plan?	□	□	■	□
c. Would additional wastewater conveyance or treatment capacity be required to serve project demand and existing commitments?	□	□	■	□
d. Generate solid waste that would exceed the permitted capacity of a landfill serving the City?	□	□	■	□
e. Conflict with federal, state, or local statutes or regulations related to solid waste?	□	□	■	□
With respect to Energy:				
f. Involve wasteful, inefficient, or unnecessary consumption of energy during project construction, operation, maintenance, and/or removal?	□	□	■	□
g. Require additional energy facilities, the provision of which may have a significant effect on the environment?	□	□	■	□
h. Be inconsistent with existing energy standards?	□	□	■	□
i. Preempt future energy development or future energy conservation, or inhibit the future use of renewable energy or energy storage?	□	□	■	□

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

The proposed project would not generate a population increase requiring the expansion of utilities or services that could cause a significant environmental impact. As shown in Section 14, *Population, Education and Housing*, the proposed project consists of commercial uses that would not generate a

large number of new jobs that would create a significant influx of new residents or employment to the city. Therefore, expansion of utilities and public services would not be necessary, and the project would have no environmental impact associated with the expansion or relocation of services.

The proposed project would increase water demand compared to demand from the currently mostly vacant site; however, water use would be characteristic of a non-manufacturing commercial warehouse with ornamental landscaping. According to the 2020 Urban Water Management Plan (UWMP), commercial water consumption in Oxnard is expected to increase from 3,744 acre-feet per year (AFY) in 2020 to 4,497 AFY in 2045; a 753 AFY, 20 percent increase in consumption (City of Oxnard 2021). CalEEMod modeling for project operation was performed as part of the Greenhouse Gas Emissions and Air Quality analysis, and provides water use estimates for each land use included in project buildout (Appendix A). The project is expected to have an annual water demand of 172 AFY at project buildout, which constitutes 23 percent of the projected increase in commercial water consumption in the city by 2045. The project's expected water demand is therefore within City demand projections outlined in the 2020 UWMP. Thus, the proposed project would have a less than significant impact on available water supplies.

LESS THAN SIGNIFICANT IMPACT

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

The project site is currently connected to sewer lines managed by the City of Oxnard, which direct wastewater to the Oxnard Wastewater Treatment Plant (OWTP). The 2021 volume of wastewater processed at the OWTP averaged 19 million gallons per day (MGD) for a population of approximately 204,675, which is well within the OWTP capacity for treating 31.7 MGD (City of Oxnard 2022). The proposed project would generate a relatively small amount of wastewater, as the commercial and retail spaces would not be a large source of employment, and land uses would not contain water intensive commercial or industrial activities. As described in Section 14, *Population, Education and Housing,* the project would generate a maximum of 54 new employees on the project site. If these employees were to generate wastewater at the same rate as described in the 2020 UWMP, approximately 92 gallons per day, the project would generate a total of 4,968 gallons of wastewater per day. This would increase the volume of wastewater collected per day at the OWTP by less than one percent. This increase would not exceed the available capacity of the OWTP. Therefore, the project would have a less than significant impact on the capacity of the wastewater service provider.

LESS THAN SIGNIFICANT IMPACT

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

Senate Bill (SB) 1016 requires that the 50 percent diversion requirement mandated by Assembly Bill (AB) 939 be measured in terms of pounds per person per day (ppd), instead of by volume or as an aggregate measure separate from population. CalRecycle sets a target for employee per capita per day disposal rates. The target is 40.8 ppd for employees. In 2020, the per capita disposal rate per employee for Oxnard was 25.0 ppd (CalRecycle 2019). Oxnard therefore currently meets AB 939 requirements.

Because the proposed project would increase the total amount of development on the project site, it may increase waste generation compared to existing conditions. CalEEMod modeling for project operation was performed as part of the Greenhouse Gas Emissions and Air Quality analysis and provides waste generation estimates for each land use included in project buildout (Appendix A). The project would generate an estimated 0.5 tons of waste per day, which would constitute a less than one percent increase in the total waste processed per day at Del Norte Regional Recycling and Transfer Station. The 0.5 tons of waste per day generated by the project would equate to 18.5 pounds per day of employee waste disposal. This is less than the 2020 target and actual employee disposal rates. Therefore, the project would not impair the attainment of solid waste reduction goals, statutes, or regulations. The project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

d. Would the project conflict with federal, state, or local statutes or regulations related to solid waste?

The City of Oxnard provides waste pick-up and hauling services for residents and businesses. Waste is delivered to the Del Norte Regional Recycling and Transfer Station, which is permitted to process 2,779 tons of waste per day, with an estimated current processing rate of 200,000 tons per year, or 550 tons per day (City of Oxnard 2013). As explained above under criterion c, the project would generate an estimated 0.5 tons of waste per day, which would constitute a less than one percent increase in the total waste processed per day at Del Norte Regional Recycling and Transfer Station. Therefore, the project would not generate waste in excess of local capacity and impacts to the capacity of local infrastructure would be less than significant.

Furthermore, SB 1016 requires the 50 percent diversion requirement mandated by AB 939 be measured in terms of pounds per person per day, instead of by volume or as an aggregate measure separate from population. CalRecycle sets a target for employee per capita per day disposal rates. The target is 40.8 ppd for employees. In 2020, the per capita disposal rate per employee for Oxnard was 25.0 ppd or 0.01 tons (CalRecycle 2019). Oxnard therefore currently meets AB 939 requirements.

Because the proposed project would increase the total amount of development on the project site, it may increase waste generation compared to existing conditions. As explained above, the proposed project would generate a maximum of 54 new employees and approximately 0.5 tons of waste per day. This equates to 18.5 ppd of employee waste disposal attributed to the proposed project. This is less than the 2020 target and actual employee disposal rates. Therefore, the project would not impair the attainment of solid waste reduction goals, statutes or regulations. The project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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

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

g. Would the project be inconsistent with existing energy standards?

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

The proposed project would not generate a population increase requiring the expansion of utilities or services that could cause a significant environmental impact. As shown in Section 14, *Population, Education, and Housing*, the proposed project consists of commercial uses that would not generate a large number of new jobs that would create a significant influx of new residents or employment to the city. Additionally, Section 7, *Energy,* provides a detailed discussion related to energy. This section determined the project would not result in a significant impact to energy infrastructure because project operational use is a small portion of the existing need. Therefore, expansion of utilities and public services would not be necessary. Section 7, *Energy,* also determined the project would not result in wasteful, inefficient, or unnecessary consumption of energy. As explained in criterion 7a, the project would be required to comply with all energy efficiency requirements of applicable regulations including California's CAL Green standards (California Code of Regulations, Title 24, Part 11). The project would be an infill development and involve reuse of an already developed site and would therefore not preempt future energy development or future energy conservation or inhibit the future use of renewable energy or energy storage. In conclusion, the project would have a less than significant impact related to energy.

LESS THAN SIGNIFICANT IMPACT

19 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	□	□	□	■
b. 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?	□	□	□	■
c. 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?	□	□	□	■
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	□	□	□	■

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes

or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

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 in a Wildland Urban Interface, which means development in the city is not built among lands prone to wildland fire (CAL FIRE 2022). Therefore, the urban location of the project site creates no impacts related to exposing people or structures to wildfire-related risk.

NO IMPACT

20 Cumulative Impacts

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would cumulative impact of the project in combination with the impacts of past, present, and reasonably foreseeable future projects exceed a City significance threshold?	□	□	■	□
j. If so, would the project's contribution to the significant cumulative impact be cumulatively considerable?	□	□	■	□

a. Would cumulative impact of the project in combination with the impacts of past, present, and reasonably foreseeable future projects exceed a City significance threshold?

b. If so, would the project's contribution to the significant cumulative impact be cumulatively considerable?

As described in the discussion of environmental checklist Sections 1 through 19, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation measures incorporated with respect to all environmental issues. These include short-term, long-term, and where appropriate, cumulative impacts. Cumulative impacts of the following resource areas have been addressed in the individual resource sections above: air quality, GHG emissions, noise, and transportation. CalEEMod was utilized to assess the air quality and greenhouse gas impacts resulting from the proposed project, leading to a conclusion that the impacts associated with air quality and GHG emissions would be less than significant when compared to applicable thresholds that take into account cumulative impacts. In addition, the Traffic Study (Appendix D) also concludes that cumulative impacts would be less than significant. Certain resource areas (e.g., agricultural and mineral) were determined to have no impact in comparison to existing conditions. Therefore, the project would not contribute to cumulative impacts related to these issues. Other issues (e.g., geology and hazards and hazardous materials) are by their nature project-specific and impacts at one location do not add to impacts at other locations or create additive impacts. The cumulative impacts of the proposed project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	□	■	□	□
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	□	□	■	□
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	□	□	■	□

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As discussed in Section 4, *Biological Resources*, there are no mapped essential habitat connectivity areas in the immediate vicinity of the project site. In addition, regional wildlife movement is restricted given the built-out nature of the project site and vicinity, and no native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites exist on or immediately around the project site. Furthermore, due to its developed nature, there is no potential for any special-status species other than nesting birds to occur on the project site; and with incorporation of Mitigation Measure BIO-1 for nesting birds,

impacts to special-status species or nesting birds would be minimized to a less than significant level. Therefore, the project would have a less than significant impact on biological resources.

As discussed in Section 6, *Cultural Resources*, the project would have a less than significant impact on unanticipated cultural resources (including archaeological and paleontological resources) with implementation of Mitigation Measure CR-1. Implementation of this mitigation measure, as well as adherence to existing local, State, and federal regulations and specific monitoring procedures related to the discovery of any unanticipated cultural resources (including archaeological, paleontological, and tribal cultural resources; and human remains) during construction activity, would reduce potential impacts to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

As described in the discussion of environmental checklist Sections 1 through 20, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation measures incorporated with respect to all environmental issues. These include short-term, long-term, and where appropriate, cumulative impacts. Cumulative impacts of the following resource areas have been addressed in the individual resource sections above: air quality, GHG emissions, noise, and transportation. CalEEMod was utilized to assess the air quality and greenhouse gas impacts resulting from the proposed project, leading to a conclusion that the impacts associated with air quality and GHG emissions would be less than significant when compared to applicable thresholds that take into account cumulative impacts. In addition, the traffic analysis (Appendix D) also concludes that cumulative impacts would be less than significant. Certain resource areas (e.g., agricultural and mineral) were determined to have no impact in comparison to existing conditions. Therefore, the project would not contribute to cumulative impacts related to these issues. Other issues (e.g., geology and hazards and hazardous materials) are by their nature project-specific and impacts at one location do not add to impacts at other locations or create additive impacts. The cumulative impacts of the proposed project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

In general, and as analyzed in this Initial Study, impacts to human beings are associated with air quality contaminants, hazards related to adverse geologic conditions, exposure to hazards and hazardous materials, and excessive noise. As detailed in analyses in Section 3, *Air Quality*, Section 8, *Geology and Soils*, Section 9, *Hazards and Hazardous Materials*, Section 10, *Hydrology and Water Quality,* and Section 13, *Noise*, the proposed project would not result, either directly or indirectly, in substantial adverse effects related to these hazards. Compliance with applicable rules and regulations, as described throughout this Initial Study, would reduce potential impacts on human beings to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

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