

### **INTRODUCTION**

*This section describes the existing air quality environment in the vicinity of the RiverPark Specific Plan Area, evaluates potential impacts from the construction and operation of the proposed project, and identifies mitigation measures to reduce impacts. The analysis in this section has been prepared in accordance with Ventura County Air Pollution Control District Guidelines for the Preparation of Air Quality Impact Analysis, November 2000.*

### **ENVIRONMENTAL SETTING**

#### **Climate and Meteorology**

Southern California lies in a semi-permanent high-pressure zone of the Eastern Pacific region. Summertime weather is dominated by the movement and intensity of the semi-permanent high pressure system that is normally centered several hundred miles southwest of California. In the spring, summer, and fall, the climate is heavily influenced by marine air. Light winds in the region allow marine air to dominate temperatures and airflow during these periods. In the winter, low-pressure weather systems originating in the northern Pacific Ocean bring clouds, wind, and rain into southern California. Santa Ana winds caused by high pressure in the high plateau region northeast of California occur intermittently during winter and fall.

The southern California area has been divided into several geographical air basins. The County of Ventura is located within the South Central Coast Air Basin (herein referred to as the Basin), that is comprised of Ventura, Santa Barbara, and San Luis Obispo Counties. The Specific Plan Area is located within the Oxnard Plain Airshed, a sub-area of the Basin. The Oxnard Plain experiences the mild, Mediterranean climate typical of southern California. Average temperatures in the Oxnard area are a 70.7°F high, a 49.9°F low, and an overall mean temperature of 60.3°F. Precipitation averages 14.45 inches per year, with the majority of rainfall occurring from November through March. Prevailing winds along the Ventura coast and Oxnard Plain are westerly and northwesterly. During the fall, Santa Ana winds reverse the prevailing airflow and bring dry, hot gusts which often have greater air movement.<sup>1</sup>

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<sup>1</sup> Ventura County Air Pollution Control District. Guidelines for the Preparation of Air Quality Impact Analysis, November 2000.

The topography and climate of Ventura County combine to make it an area of smog potential. Temperature inversions occur frequently at approximately 800-1,000 feet above mean sea level in Ventura County, and are most persistent during late summer and early fall. Temperature inversions are created when a warm air mass descends over a lower, cooler, moist marine air layer. The warm upper layer forms a cap over the marine layer and inhibits the air pollutants generated near the ground from dispersing upward. Light summer winds and the surrounding mountains further limit the horizontal disbursement of the pollutants. Concentrating volumes of pollutants in this manner allows the summer sunlight to generate high levels of photochemical smog. In the winter, cool ground temperatures and very light winds can cause extremely low inversions and air stagnation, trapping pollutants during the late night and early morning hours.

### **Characteristics and Causes of Air Pollution**

Air pollutants are emitted from a mix of “mobile sources” and “stationary sources.” Mobile sources are motor vehicles, including cars, trucks, trains, airplanes, construction vehicles, etc. Stationary sources include electricity generation facilities, oil wells, gas flaring facilities, gas burning appliances, fireplaces, evaporation from organic solvents, pesticides, and paints, the release of landfill gases, and other sources. Windblown dust and soil materials also contribute to air pollution. A cumulative mix of air pollutants often results in the formation of a brownish haze in the air known as “smog.” Common air pollutants include reactive organic compounds (ROC), oxides of nitrogen ( $\text{NO}_x$ ), particulate matter, carbon monoxide (CO), oxides of sulfur ( $\text{SO}_x$ ), and toxic air emissions such as lead.

Ozone ( $\text{O}_3$ ) and particulate matter are the two main air pollutants of concern in southern California, as ambient levels of these pollutants often exceed State and Federal standards within the region. Ozone is formed by photochemical reactions involving sunlight energy and the precursor air emissions ROC and  $\text{NO}_x$ . In the upper atmosphere, ozone helps to shield the Earth from harmful radiation. However, in the lower atmosphere where people live, ozone poses health risks and damages plant tissues and man-made materials (e.g., paint, rubber, metals). Particulate matter is comprised of finely divided solids or liquids such as dust, soot, aerosols, fumes, and mists. Particulate matter in the air can be inhaled by persons and other animals, and is harmful to the tissues of the respiratory system. The particulates of primary concern are those less than 10 microns in diameter ( $\text{PM}_{10}$ ), which are able to penetrate deeper into the lungs than are larger particulates.

### **Regulatory Agencies and Responsibilities**

Air quality within the Basin is addressed through the efforts of various Federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality

through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies primarily responsible for improving the air quality within the Basin are discussed below along with their individual responsibilities.

### ***U.S. Environmental Protection Agency***

The U.S. Environmental Protection Agency (U.S. EPA) is responsible for enforcing the 1990 amendments to the Federal Clean Air Act (CAA) and the national ambient air quality standards (Federal standards) that the Act establishes. These standards identify levels of air quality for six “criteria” pollutants which are considered the maximum levels of ambient (background) air pollutants that provide an adequate margin of safety in protecting the public health and welfare. The six criteria pollutants include ozone, CO, nitrogen dioxide (NO<sub>2</sub>, which is a form of NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), PM<sub>10</sub>, and lead. In July 1997, the EPA approved new federal standards for particulate matter less than or equal to 2.5 microns in size (PM<sub>2.5</sub>).

The U.S. EPA also has regulatory and enforcement jurisdiction over emission sources beyond State waters (outer continental shelf), and those that are under the exclusive authority of the Federal government, such as aircraft, locomotives, and interstate trucking. In response to its enforcement responsibilities, the U.S. EPA requires each state to prepare and submit a State Implementation Plan (SIP) that describes how the state will achieve the Federal standards by specified dates, depending on the severity of the air quality within the state or air basin. The Ventura County portion of the SIP consists of the Ventura County Air Quality Management Plan (discussed later in this EIR section) and the Ventura County Air Pollution Control District Rules and Regulations.

### ***California Air Resources Board***

The California Air Resource Board (ARB), a department of the California Environmental Protection Agency (CALEPA), oversees air quality planning and control throughout California. It is primarily responsible for ensuring implementation of the 1989 amendments to the California Clean Air Act (CCAA), responding to the Federal CAA requirements, and for regulating emissions from motor vehicles and consumer products within the State. The ARB has established emission standards for vehicles sold in California and for various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

The amendments to the CCAA establish ambient air quality standards for the State and a legal mandate to achieve these standards by the earliest practicable date. These standards apply to the

same six criteria pollutants as the Federal CAA, and also include sulfates, visibility reducing particles, hydrogen sulfide, and vinyl chloride. State standards are also more stringent than the Federal standards and, in the case of PM<sub>10</sub> and SO<sub>2</sub>, far more stringent. Based on monitored pollutant levels, the CCAA divides non-attainment areas into three categories—moderate, serious, and severe—to which progressively more stringent requirements apply. Ventura County is classified as a severe non-attainment area for the State ozone standard. Levels of PM<sub>10</sub> also exceed State standards throughout Ventura County.

### ***Ventura County Air Pollution Control District***

The management of air quality in Ventura County is the responsibility of the Ventura County Air Pollution Control District (APCD). The APCD is responsible for bringing air quality in the County into conformity with Federal and State air quality standards. Specifically, the APCD has the responsibility to monitor ambient air pollutant levels throughout the County and to develop and implement attainment strategies to ensure that future emissions will be within Federal and State standards.

As discussed previously, the Federal and State Clean Air Acts require the preparation of plans to reduce air pollution to acceptable levels. The APCD has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs), the most recent and rigorous of which was approved by the Ventura County Air Pollution Control Board on November 8, 1994 and by the ARB on November 15, 1994. The 1994 AQMP was later revised to incorporate changes in rules and anticipated air quality controls. The revisions were approved by the County of Ventura and the ARB in December 1995. The 1994 AQMP and the 1995 AQMP Revision are designed to comply with the provisions of the 1990 amendments to the Federal CAA and the 1988 CCAA, to accommodate growth, to reduce the levels of pollutants within the county, and to identify a control strategy to reduce ozone forming emissions from mobile and stationary sources. Based upon the emission control strategies proposed in the 1995 AQMP Revision, it is predicted that Ventura County will attain the Federal ozone standard by the year 2005, as mandated by the CAA. Subsequently, a 1997 AQMP revision was also approved. This revision proposed that the adoption and implementation dates for nine control measures be revised. These control measures are contained in Alternative 2 of the 1995 AQMP Revision.

The APCD is responsible for limiting the amount of emissions that can be generated throughout the County by various stationary and mobile sources. Specific rules and regulations have been adopted by the Ventura County Air Pollution Control Board which limit the emissions that can be generated by various uses and/or activities, and identify specific pollution reduction measures which must be

implemented in association with various uses and activities. These rules not only regulate the emissions of the six criteria pollutants, but also toxic emissions and acutely hazardous materials.<sup>2</sup> The rules and regulations are also subject to ongoing refinement by the APCD. Emissions sources subject to these rules are regulated through the APCD's permitting process. Through this permitting process, the APCD also monitors the amount of stationary emissions being generated and uses this information in developing the AQMP. The proposed project would be subject to APCD rules and regulations to reduce project emissions and to mitigate potential air quality impacts.

In 2000, the Air Quality Planning and Evaluation Section of the APCD prepared its *Guidelines for the Preparation of Air Quality Impact Analyses* as a guidance document to assist local government agencies and consultants in preparing environmental documents for projects subject to the California Environmental Quality Act (CEQA). This document describes the criteria that the APCD uses when reviewing and commenting on the adequacy of environmental documents, such as this EIR. It recommends thresholds for use in determining whether projects would have significant adverse environmental impacts, identifies methodologies for predicting project emissions and impacts, and identifies measures that can be used to avoid or reduce air quality impacts. This EIR was prepared following the recommendations of the APCD presented in the *Guidelines for the Preparation of Air Quality Impact Analyses*.

### **Local Governments**

Local governments, such as the City of Oxnard, have the authority and responsibility to reduce air pollution through their police power and land use decision-making authority. Specifically, local governments are responsible for the mitigation of emissions resulting from land use decisions and for the implementation of transportation control measures as outlined in the AQMP. The AQMP assigns local governments certain responsibilities to assist the County in meeting air quality goals and policies. In general, a first step toward implementation of a local government's responsibility is accomplished by identifying air quality goals, policies, and implementation measures in its general plan. Through capital improvement programs, local governments can fund infrastructure that contributes to improved air quality, by requiring such improvements as bus turnouts, energy-efficient street lights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, local governments assess air quality impacts, require mitigation of potential air quality impacts by conditioning discretionary permits, and monitor and enforce implementation of such mitigation.

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<sup>2</sup> Defined by the Federal government as an air pollutant to which no ambient air quality standard is applicable and which, in the judgment of the administrator of the U.S. EPA, may result in an increase in mortality, serious irreversible illness, or incapacitating reversible illness.

## Regional Air Quality

To identify ambient concentrations of the six criteria pollutants, the APCD operates eight air quality monitoring stations throughout Ventura County. These stations are located in Thousand Oaks, El Rio, Ventura (2 stations), Piru, Ojai, Simi Valley, and on Anacapa Island. In addition, the ARB operates a ninth monitoring station in western Ventura County. The monitoring station located closest to the Specific Plan Area and most representative of air quality within the City is the El Rio station. This station presently monitors the emission levels of O<sub>3</sub>, CO, NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>.

**Table 4.8-1**, below, lists the concentrations registered and the violations of State and Federal standards that have occurred at the El Rio monitoring station from 1996 through 2000.<sup>3</sup> As shown, the local air monitoring stations have registered values above State and Federal standards for both ozone, and PM<sub>10</sub>. No other monitored air quality standard has been violated at the El Rio Station. Concentrations of SO<sub>2</sub> registered in Ventura County have not exceeded State or Federal standards in recent years and lead is no longer monitored in Ventura County.

## Local Emissions

Air emissions are generated by a variety of sources in the area surrounding the Specific Plan Area. Motor vehicles traveling along local roadways such as Vineyard Avenue and Ventura Road are one such source. As agricultural uses exist in the local vicinity of the site, diesel and gasoline powered equipment (i.e., tractors, trucks) as well as pesticide spraying are used near by; each of which emit air pollutants. Finally, the residential land uses in proximity to the site also emit air pollutants.

Traffic-congested roadways and intersections have the potential for the generation of high, localized CO levels within approximately 1,000 feet of a roadway. Localized areas where ambient concentrations exceed state standards are termed CO “hot-spots.” The APCD recommends the use of CALINE4, a dispersion model developed by Caltrans, for predicting CO concentrations near roadways. CALINE4 adds roadway-specific CO emissions calculated from peak traffic volumes to ambient CO air concentrations. In evaluating CO concentrations at study area intersections determined in the traffic report conducted for the project (included as **Appendix 4.7** of this EIR), a simplified CALINE4 screening procedure was used. This computer model was developed by the Bay Area Air Quality Management District, and has been endorsed for use for analysis of local emission impacts by the APCD.

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<sup>3</sup> This is the most recent data available.

**Table 4.8-1  
Ambient Pollutant Concentrations**

Pollutant <sup>1</sup>	Standards <sup>2</sup>	Year				
		1996	1997	1998	1999	2000
<b>OZONE (O<sub>3</sub>)</b>						
Maximum 1-hour concentration monitored (ppm)		0.121	0.102	0.106	0.103	0.084
Number of days exceeding State standard	>0.09 ppm	8	2	1	1	0
Number of days exceeding Federal standard	>0.12 ppm	0	0	0	0	0
Number of days with stage 1 ozone episode	0.20 ppm	0	0	0	0	0
Number of days with stage 2 ozone episode	0.35 ppm	--	--	--	--	--
<b>CARBON MONOXIDE (CO)</b>						
Maximum 1-hour concentration monitored (ppm)		2.2	2.6	3.7	2.4	2.1
Number of days exceeding State 1-hour standard	>20.0 ppm	0	0	0	0	0
Number of days exceeding Federal 1-hour standard	>35.0 ppm	0	0	0	0	0
Maximum 8-hour concentration monitored (ppm)		1.5	1.9	2.0	1.2	1.3
Number of days exceeding Federal and State 8-hour standard	9.1 ppm	0	0	0	0	0
<b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>						
Maximum 1-hour concentration monitored (ppm)		.110	0.072	0.088	0.099	0.074
Annual average monitored (ppm)		--	0.014	0.013	0.014	--
Number of days exceeding 1-hour State standard	>0.25 ppm	0	0	0	0	0
<b>SUSPENDED PARTICULATE MATTER (PM<sub>10</sub>)</b>						
Maximum 24-hour concentration (µg/m <sup>3</sup> )		64	253	70	51	52
Number of samples		61	60	59	56	61
Number of samples exceeding State standard	>50 µg/m <sup>3</sup>	1	3	1	1	1
Number of samples exceeding Federal standard	>150 µg/m <sup>3</sup>	0	1	0	0	0
<b>SUSPENDED PARTICULATE MATTER (PM<sub>2.5</sub>)</b>						
Maximum 24-hour concentration (µg/m <sup>3</sup> )		--	--	--	36.7	45.7
Number of samples		--	--	--	92	106
Number of samples exceeding Federal standard	>65 µg/m <sup>3</sup>	--	--	--	0	0

Sources: California Air Resources Board, Summary of Air Quality Data (for 1996, 1997, 1998, 1999 and 2000). Sacramento, California: California Air Resources Board, 1996, 1997, 1998, 1999 and 2000.

<sup>1</sup> Parts by volume per million of air (ppm), micrograms per cubic meter of air (µg/m<sup>3</sup>), or annual arithmetic mean (aam).

<sup>2</sup> Federal and State standards are for the same time period as the maximum concentration measurement unless otherwise indicated.

The methodology utilized in this CO modeling assumes worst-case conditions (i.e., wind direction is parallel to the primary roadway, 90° to the secondary road, wind speed is less than one meter per second, extreme atmospheric stability) and provides a screening of maximum, worst-case, CO concentrations.

The APCD and Caltrans recommend that the CO analysis focus on “sensitive receptors.” Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the

population at large. The APCD identifies the following as examples of sensitive receptors: residences, work sites, playgrounds, parks, athletic facilities, rehabilitation centers, childcare centers, retirement homes, convalescent centers, and hospitals.<sup>4</sup>

Maximum CO concentrations were calculated for peak hour traffic conditions at study intersections identified in the project traffic report that have sensitive receptors in their vicinity. CO concentrations at 50, 100, and 300 feet from each roadway edge determined by CO modeling are presented in **Table 4.8-2**. State of California 1-hour and 8-hour CO standards are 20.0 ppm and 9.1 ppm, respectively. As shown in **Table 4.8-2**, 1-hour 8-hour CO concentrations at 50 feet are below State standards at all study intersections under existing conditions.

**Table 4.8-2**  
**Existing Carbon Monoxide Concentrations**

Intersection	50 Feet		100 Feet		300 Feet	
	1-Hour <sup>1</sup>	8-Hour <sup>2</sup>	1-Hour <sup>1</sup>	8-Hour <sup>2</sup>	1-Hour <sup>1</sup>	8-Hour <sup>2</sup>
Gonzales Road and Oxnard Boulevard	6.2	3.8	5.6	3.3	4.7	2.7
Johnson Drive and Bristol Road	5.8	3.5	5.2	3.1	4.4	2.5
Johnson Drive and North Bank Drive	6.1	3.7	5.4	3.2	4.5	2.6
Johnson Drive and Ralston Street	4.5	2.6	4.3	2.4	4.0	2.2
Ralston Street and Victoria Avenue	6.3	3.8	5.6	3.3	4.6	2.6
Telephone Road and Victoria Avenue	6.1	3.7	5.5	3.3	4.6	2.6
Valentine Road and US 101	6.1	5.5	5.0	3.2	4.5	2.6
Valentine Road and Victoria Avenue	6.9	4.3	6.0	3.6	4.8	2.8
Ventura Road and Gonzales Road	6.0	3.6	5.3	3.1	4.5	2.5
Ventura Road and Town Center Drive	5.1	3.0	4.7	2.7	4.2	2.4
Ventura Road and Vineyard Avenue	5.4	3.2	4.9	2.9	4.3	2.4
Ventura Road and Wagon Wheel Road	5.4	3.2	4.9	2.8	4.2	2.4
Vineyard Avenue and Esplanade Drive	6.5	3.9	5.7	3.4	4.7	2.7
Vineyard Avenue and Oxnard Boulevard	6.7	4.1	5.9	3.5	4.8	2.8
Vineyard Avenue and Stroube Street	5.6	3.3	5.0	2.9	4.3	2.4
Vineyard Avenue and Myrtle Street	6.3	3.8	5.5	3.3	4.5	2.6
Wagon Wheel Road and US 101 Southbound Ramps	5.1	3.0	4.7	2.7	4.1	2.3

Source: Impact Sciences, Inc. Emissions calculations are provided in **Appendix 4.8**.

<sup>1</sup> State standard is 20.0 parts per million. Federal standard is 35 parts per million.

<sup>2</sup> State standard is 9.1 parts per million. Federal standard is 9.5 parts per million.

## On-Site Emissions

The Specific Plan Area presently consists of various land uses, including active concrete, asphalt and recycling plants on the mine site, the Ventura County El Rio Maintenance Yard, office buildings,

<sup>4</sup> Ventura County Air Pollution Control District, Air Quality Planning and Evaluation Section: Guidelines for the Preparation of Air Guidelines for the Preparation of Air Quality Impact Analyses, p. 6-2.

agricultural uses and commercial uses. Of these uses, the existing Hanson Aggregates Mine Site in RiverPark Area 'B' constitutes the largest land use in terms of size. The Hanson Aggregates Mine Site is one of several sand and gravel mining sites located along the eastern edge of the Santa Clara River. The site includes the plant area, a stockpile area and three open mining pits. Mining of the site began in the early 1950's. While mining activities have ceased, the processing facilities are still in use. The active plant facilities include two ready mix concrete batch plants operated by Associated Ready Mix, an asphalt plant operated by Sully Miller, a recycling plant operated by Hanson Aggregates, and related shop areas and offices. Hanson Aggregates has recently removed some facilities and completed other site maintenance activities in accordance with the approved reclamation plan for the site. Over the past year Hanson Aggregates has removed a rock and sand plant, various equipment in other locations on the property, an underground asphalt oil tank, and three transformers. The remainder of the mine site consists of disturbed open space areas primarily made up of exposed soils and sediment piles. All roads on the mine site are unpaved. These existing conditions result in the generation of fugitive dust during windy conditions.

The agricultural fields within the Specific Plan Area, which are presently under cultivation with strawberries, also generate fugitive dust during periods when the fields are being plowed, prepared for planting and cleared. The remaining existing uses within the Specific Plan Area do not generate fugitive dust or substantial amounts of other air emissions.

### ***Asbestos Containing Building Materials***

Structures constructed or remolded between 1930 and 1981 have the potential of asbestos containing building materials (ACBM). These materials can include, but are not limited to: resilient floor coverings, drywall joint compounds, acoustic ceiling tiles, piping insulation, electrical insulation and fireproofing materials.

## **PROJECT IMPACTS**

### **Thresholds of Significance**

For purposes of this analysis, the City of Oxnard is using the following thresholds contained in the November 2000 *Ventura County Air Quality Assessment Guidelines* published by the APCD. The APCD has developed significance threshold criteria to evaluate the potential impacts of proposed projects within Ventura County. Consistent with these thresholds, the proposed project would have a significant project level air quality impact if it would:

- Generate daily operational emissions of greater than 25 pounds per day (ppd) ROC or NO<sub>x</sub>;
- Cause an ambient air quality standard (State or Federal) to be exceeded, or make a substantial contribution to an already exceeded air quality standard. In this context, “substantial” is defined as making the ambient pollutant level measurably worse;<sup>5</sup>
- Create a human health hazard by subjecting sensitive receptors to harmful toxic air emissions; or,
- Subject persons to objectionable odors.

## Construction Impacts

During construction, on-site stationary sources, heavy-duty construction vehicles, construction worker vehicles, and energy use would generate air emissions. In addition to construction vehicle emissions, fugitive dust would also be generated during grading and construction activities over the entire 701-acre Specific Plan Area. Approximately 10 million yards of earth materials will be graded. A balanced grading program involving excavation and replacement of these 10 million cubic yards of material within the Specific Plan Area is planned. The majority of this grading would consist of the excavation and replacement of earth in RiverPark Area ‘B.’

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

In RiverPark Area ‘B’, approximately 7.8 million cubic yards of earth will be excavated. The majority of this material, approximately 5.95 million yards, will be excavated in the southern area of the Specific Plan Area. The existing elevations vary from approximately 70 to 115 feet in RiverPark Area ‘B’. After grading, the elevations will vary from 80 to 100 feet. In order to create the planned grades some material will be relocated between areas in RiverPark Areas ‘A’ and ‘B’.

Earthmovers typically generate approximately 21.8 pounds of airborne dust per hour of operation. Assuming an average use of five earthmovers during grading activities, this equates to approximately 872 pounds of dust generated per day. While much of this airborne dust would settle on, or near, the area being graded, smaller particles would remain in the atmosphere, increasing existing particulate levels within the surrounding area. Standard dust control techniques typically reduce the amount of airborne dust generated by construction activities by an average of 70 percent. Some health problems,

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<sup>5</sup> Ventura County Air Pollution Control District, Ventura County Air Quality Assessment Guidelines, November 2000, p. 3-5.

particularly those of the eye and respiratory tract (i.e., Coccidioidomycosis or its common name Valley Fever), may be aggravated by fugitive dust. (Valley fever is contracted through breathing spores that become airborne through disturbance of the soil.) However, Ventura County has not been recognized as an area where Coccidioidomycosis is highly endemic.<sup>6</sup> The only large scale outbreak in the County occurred in Simi Valley between January 24 and March 15, 1994 following the Northridge earthquake due to uncontrolled dust clouds created by landslides.<sup>7</sup> Because these construction-related emissions are only temporary, the APCD considers construction related air quality impacts to be less than significant, however, it recommends the implementation of mitigation measures. These measures are identified later in this EIR section.

Demolition of the existing buildings on the mine site and in the El Rio Maintenance Yard could result in the disturbance of friable asbestos containing building materials, given the age of these existing structures. Potential health and safety impacts are associated with the release of asbestos into the air. However, all demolition activities would be subject to regulations. Specifically, demolition activities are required to conform with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) as well as APCD Rule 62.7 on Asbestos, Demolition and Renovation. This rule is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste generated or handled during these activities.<sup>8</sup> Conformance with these regulations would ensure that any emissions of asbestos would be contained and not pose a significant health effect to workers. No significant impact would occur.

With regard to the particulate emissions associated with construction equipment, the ARB has classified diesel exhaust as a toxic air contaminant. The ARB is now studying the matter further. This process is anticipated to take several years before controls and regulations will be introduced for all sources of diesel emissions, including construction equipment, generators, school buses, and passenger vehicles. It will also take several years for the ARB to develop methodologies and/or models to assess the impacts of mobile diesel exhaust sources. The APCD does not require air toxic analyses for diesel sources. When the ARB develops methodologies and/or models for diesel exhaust emissions, the APCD will incorporate them into the *Ventura County Air Quality Assessment Guidelines* as guidance however, as construction operations occur over a relatively short time frame of up to a few years, the APCD does not consider exposure to construction air quality emissions, including diesel exhaust, to cause any significant impacts.

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<sup>6</sup> Eileen Schneider and others, "A Coccidioidomycosis Outbreak Following the Northridge, Calif. Earthquake," *Journal of American Medicine* Vol. 277, No. 11 (March 19, 1997): 904.

<sup>7</sup> *Ibid.*

<sup>8</sup> Ventura County Air Pollution Control District, *Ventura County Air Quality Assessment Guidelines*, November 2000, p. 6-12.

## ***Operational Emissions***

After the proposed land uses within the Specific Plan Area are built and occupied, emissions would be generated by both stationary and mobile sources on a regular, day to day basis. Stationary emissions would be generated primarily as a result of natural gas consumption, landscape maintenance and consumer products. Mobile source emissions would be generated by motor vehicles traveling to, from, and within the project area.

Certain design features, consistent with the *ACPD Guidelines*, have been incorporated into the RiverPark Specific Plan. The *APCD Guidelines* state that addressing site design and land use issues at the conceptual stage of development maximizes opportunities to incorporate measures to reduce potential air quality impacts. Land use design features suggested in the *APCD Guidelines* which been incorporated into the RiverPark project include:<sup>9</sup>

- Encourage the development of higher density housing and employment centers near public transit corridors.
- Encourage compact development featuring a mix of uses that locates residences near jobs and services.
- Provide services, such as food services, banks, post offices, and other personal services within office parks and other large developments.
- Encourage infill development.
- Ensure that the design of streets, sidewalks, and bike paths within a development encourage walking and biking.
- Provide landscaping to reduce energy demand for cooling.

An estimate of the ROC and NO<sub>x</sub> emissions that would be generated by the uses allowed by the proposed Specific Plan of the proposed project has been calculated using the URBEMIS7G computer model recommended for use by the APCD. This model was utilized as it is the most detailed methodology available to calculate project-related mobile emissions. This model takes into account planning features such as those listed above in the estimate of emissions. The emission estimates are presented below in **Table 4.8-3**.

As shown, the land uses allowed by the Specific Plan would generate total emissions that would exceed APCD recommended significance thresholds for ROC and NO<sub>x</sub> emissions. This is a direct reflection of the amount of development allowed by the Specific Plan. Development of the uses allowed by the

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<sup>9</sup> Ventura County Air Pollution Control District, Ventura County Air Quality Assessment Guidelines, November 2000, p. 1-5.

proposed Specific Plan would take place over a number of years. The beginning of construction is anticipated in 2002 with build-out of the allowed uses taking until 2020. As a result, operational emissions would not reach the estimated figures presented in **Table 4.8-3** until full, maximum build-out of the land uses permitted by the Specific Plan. As these figures reflect the maximum allowable development within the Specific Plan Area, it is important to note that less development could occur. As such, the total emissions generated could be smaller than the amounts shown in **Table 4.8-3**. As both the ROC and NO<sub>x</sub> emissions would exceed the thresholds of significance used in this analysis, the impact of the project on air quality is significant.

**Table 4.8-3  
Estimated Operational Emissions - Proposed RiverPark Project, Year 2020**

Emissions Source	Emissions in Pounds per Day, Year 2020	
	ROC	NO <sub>x</sub>
Mobile Sources	64.13	189.45
Stationary Sources	25.13	8.90
<b>Totals:</b>	<b>89.26</b>	<b>198.35</b>
<b>Threshold:</b>	25	25
<b>Exceeds Threshold?</b>	<b>YES</b>	<b>YES</b>
<b>Exceeds Threshold by</b>	<b>64.26</b>	<b>173.35</b>

Source: Impact Sciences, Inc. Emissions calculations are provided in **Appendix 4.8**.

### CO Levels at Study Intersections with the Project

Because the APCD has not made future estimates of background CO levels, the background CO levels of 3.7 ppm for 1-hour concentration and 2.0 ppm for 8-hour concentration are used in the analysis of future CO concentrations. These figures represent the highest readings taken from the El Rio monitoring station between the beginning of 1996 and the end of 2000. This methodology assumes a conservative estimate in forecasting future CO background levels as background CO levels in southern California are expected to drop in the future as the use of cleaner technologies (fuel cells, alternative fuels, electric cars, etc.) becomes more prevalent in the vehicle fleet mix. The South Coast Air Quality Management District (SCAPCD) has, for instance, predicted substantial future drops for ambient concentrations of CO and other air pollutants in the South Coast Air Basin, which includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Additionally, the CALINE4 model assumes worst-case conditions with regard to dispersal of pollutants, and traffic inputs to the model represent peak hour, maximum expected volumes.

The CO concentrations at study intersections estimated in this analysis is based on the City's traffic model and assume a cumulative analysis that includes trip generation over existing conditions due to the maximum allowed buildout of the proposed on-site uses, growth anticipated as a result of the 2020 General Plan build-out of the City of Oxnard as well as regional growth (see **Appendix 4.8**). Therefore, the cumulative analysis prepared for this project analyzes a larger cumulative scope than typically analyzed. Estimates of future CO levels with the project are presented in **Table 4.8-4**.

**Table 4.8-4**  
**With Project Carbon Monoxide Concentrations**

Intersection	25 Feet		50 Feet		100 Feet	
	1-Hour <sup>1</sup>	8-Hour <sup>2</sup>	1-Hour <sup>1</sup>	8-Hour <sup>2</sup>	1-Hour <sup>1</sup>	8-Hour <sup>2</sup>
<b>Off-Site</b>						
Gonzales Road and Oxnard Boulevard	5.7	3.4	5.2	3.1	4.5	2.5
Johnson Drive and Bristol Road	4.9	2.8	4.6	2.6	4.1	2.3
Johnson Drive and North Bank Drive	6.4	3.9	5.6	3.3	4.6	2.7
Johnson Drive and Ralston Street	4.2	2.3	4.0	2.2	3.9	2.1
Ralston Street and Victoria Avenue	5.2	3.1	4.8	2.8	4.2	2.4
Telephone Road and Victoria Avenue	5.1	3.0	4.8	2.7	4.2	2.4
Valentine Road and US 101	5.2	3.1	4.8	2.8	4.2	2.4
Valentine Road and Victoria Avenue	6.2	3.7	5.5	3.3	4.5	2.6
Ventura Road and Gonzales Road	5.7	3.4	5.1	3.0	4.4	2.5
Ventura Road and Town Center Drive	4.8	2.8	4.5	2.6	4.1	2.3
Ventura Road and Vineyard Avenue	5.2	3.1	4.8	2.8	4.2	2.4
Ventura Road and Wagon Wheel Road	5.2	3.0	4.8	2.7	4.2	2.3
Vineyard Avenue and Esplanade Drive	6.2	3.7	5.5	3.3	4.6	2.6
Vineyard Avenue and Oxnard Boulevard	6.1	3.7	5.4	3.2	4.6	2.6
Vineyard Avenue and Stroube Street	4.7	2.7	4.4	2.5	4.0	2.2
Vineyard Avenue and Simon Way	4.4	2.5	4.2	2.4	3.9	2.2
Vineyard Avenue and Myrtle Street	5.8	3.5	5.2	3.1	4.4	2.5
Wagon Wheel Road and US 101 Southbound Ramps	4.7	2.7	4.4	2.5	.0	2.2
<b>On-Site</b>						
Oxnard Boulevard and Town Center Drive	5.5	3.3	5.0	2.9	4.3	2.4
Oxnard Boulevard and Santa Clara River Boulevard	4.3	2.4	4.1	2.3	3.9	2.1
Oxnard Boulevard and South Park Drive	4.1	2.3	4.0	2.2	3.8	2.1
Oxnard Boulevard and North Park Drive	4.0	2.2	3.9	2.2	3.8	2.1
Santa Clara River Boulevard and South Park Drive	4.3	2.4	4.1	2.3	3.9	2.1
Santa Clara River Boulevard and Vineyard Avenue	4.6	2.6	4.3	2.4	4.0	2.2

Source: Impact Sciences, Inc. Emissions calculations are provided in **Appendix 4.8**.

<sup>1</sup> State standard is 20.0 parts per million. Federal standard is 35 parts per million.

<sup>2</sup> State standard is 9.1 parts per million. Federal standard is 9.5 parts per million.

As shown, future CO levels at the study intersections are expected to be similar to current levels with the inclusion of vehicle traffic generated by the project and other projects that have been approved or are pending approval. Future CO concentrations at all of the study intersections will be well below

Federal and State standards. As such, no significant CO concentrations will result from the increase in traffic associated with the proposed project.

### **Odors**

Odors associated with the land uses allowed by the proposed Specific Plan Area would be similar in nature to other similar land uses. There are no planned uses that are expected to generate objectionable odors. The existing mine and agricultural uses would cease and odors associated with these uses would also cease. Should objectionable odors be generated by the proposed land uses and drift off the site, there would be the potential for impacts to the residential uses located east of the Specific Plan Area. However, the proposed project would be subject to APCD Rule 51 (Nuisance), which is based on the receipt and confirmation of citizen complaints regarding hazardous, odorous, or nuisance-causing substances that may be emitted by a project. Should the APCD receive a complaint, an APCD inspector would inspect the site and identify both the source(s) of the odor(s) and measures to alleviate the nuisance. Any complaints associated with odors from the Specific Plan Area would be investigated by APCD staff and turned over to the Ventura County Department of Environmental Health if necessary. APCD staff indicates that complaints are seldom received regarding odors from residential developments. Given the above, the potential for the proposed project to generate objectionable odors is not considered to be significant.

Odors created off-site that could potentially drift onto the Specific Plan Area would originate from surrounding residential and agricultural land uses, and the Santa Clara River. As discussed above, residential areas are not generally associated with objectionable odors. Noticeable odors can be generated by fertilizer and pesticide use in agricultural areas. The residential and industrial uses to the east of the Specific Plan Area provide a substantial buffer to the nearest agricultural land. The nearest agricultural land to any residential uses in the Specific Plan Area would be located approximately 1,500 feet to the northeast across Vineyard Avenue. With this physical separation, no odor impacts from the agricultural areas are anticipated. In addition, all aerial spraying of pesticides and fertilizers are subject to permits issued by the County of Ventura Agricultural Commissioner's Office. These conditions restrict spraying activities during high wind conditions. The Santa Clara River directly abuts the Specific Plan Area to the west and produces natural odors associated with microbial activity, flora, and fauna. However, the river is not subject to dumping or chemical treatment, and typically does not produce objectionable odors. In conclusion, proposed on-site land uses would not be subjected to objectionable levels of odor from off-site uses, and related impacts would be less than significant.

### Human Health Risk — Off-Site Emissions

The Air Toxic “Hot Spots” Information and Assessment Act of 1987 (AB 2588) was adopted by the California Legislature in response to increasing public concern about emissions of toxic chemicals to the air. Under AB 2588, hot spot facility owners must produce a comprehensive inventory of routine releases of hundreds of toxic compounds to the air. Based on the results of the inventories, some facility owners have been required to perform health risk assessments to evaluate the impact of routine releases of toxins from their facilities. If the health risk assessment shows a significant risk, the facility operator will be required to notify the public of the results of the risk assessment. Further State legislation (SB 1731), effective January 1, 1993, requires emissions reductions from facilities that pose a significant health risk. This legislation does not, however, define what represents a “significant” level of risk. The County of Ventura has established a 10 in one million cancer risk and a 1.0 non-cancer hazard index as the criteria for determining what constitutes a significant level of risk from toxic air emissions facilities.

Per the provisions of AB 2588 and evaluation of the Toxic Air Contaminant Emissions Inventory for Ventura County by the APCD, 21 facilities in the vicinity (within an approximate quarter-mile radius) of the Specific Plan Area are on record. Of these 21 facilities, 15 are listed as 'tracking' while 6 are listed as 'under evaluation.' Based on available data, tracking facilities have been found to be unlikely to pose a significant health risk to nearby residents or workers, while facilities 'under evaluation' have demonstrated insufficient data to determine if the facility could pose a significant health risk to nearby residents or workers. It should be noted that all existing uses within the Toxic Air Contaminant Emissions Inventory have undergone project specific review. Therefore, any existing facility would be consistent with the provisions of AB 2588. Should toxic air emissions issues associated with any of the nearby facilities occur in the future, the obligation for complying with AB 2588 and other related legislation would be the responsibility of the facility in violation. This is due to legislative requirements intended to regulate and enforce against the operator causing the emissions. It should be noted that this analysis is only intended to discuss potential air quality impacts associated with the release of harmful air emissions from nearby stationary sources and not those of hazardous materials stored, handled or used on adjacent properties. Considering the above, toxic air emissions from facilities in the area would have a less than significant impact on the uses proposed by the project.

## CUMULATIVE IMPACTS

### Thresholds of Significance

For purposes of this analysis, the City of Oxnard is using the following thresholds contained in the November 2000 *Ventura County Air Quality Assessment Guidelines* published by the APCD. The APCD has developed significance threshold criteria to evaluate the potential impacts of proposed projects within Ventura County. Consistent with these thresholds, the proposed project would contribute to a significant cumulative air quality impact if it would:

- Generate operational emissions greater than 25 ppd of ROC or NO<sub>x</sub>; or
- Generate more than 2.0 ppd of ROC, or 2.0 ppd of NO<sub>x</sub>, and be inconsistent with the AQMP.

### Operational Emissions

Referring to the significance thresholds stated above, a project would result in a significant impact if it results in a net increase in ROC and NO<sub>x</sub> emissions above 25 pounds per day. Based on the air quality analysis prepared according to APCD standards, total operational emissions were calculated for the proposed project. As shown on **Table 4.8-3**, the project would exceed the 25 pounds per day threshold for ROC and NO<sub>x</sub> by 89.26 and 198.35 pounds, respectively. Consequently, the proposed project would be considered to have cumulatively significant impacts with respect to ROC and NO<sub>x</sub> emissions.

### CO Concentrations at Study Intersections

Build-out of the uses allowed by the Specific Plan is anticipated by 2020. The analysis of 2020 CO concentrations at the studied intersections accounts for traffic volumes generated by the proposed project, build-out of the *City of Oxnard 2020 General Plan*, and regional growth, as discussed in the traffic study prepared for the project. Accordingly, the CO concentrations presented in **Table 4.8-4** are also representative of cumulative CO concentrations. As shown in the table, predicted 2020 CO concentrations at the study intersections with the project and cumulative growth would not exceed the State 1-hour or 8-hour CO standards. Cumulative impacts with regards to CO concentrations would be less than significant.

## AQMP Consistency

The November 2000 *Ventura County Air Quality Assessment Guidelines*, Section 4.2, Procedures for Determining Consistency with the AQMP states:

*“Inconsistent projects are usually those that cause the existing population to exceed the population forecasts contained in the most recently adopted AQMP. In addition to addressing consistency with the population forecasts, the air quality impact assessment should also address project consistency with emission reduction strategies included in the AQMP. The AQMP contains a number of transportation and energy control measures that help to reduce project emissions. These can be used to help reduce a project’s indirect emissions. Transportation and energy conservation control measures should be incorporated into the project design early in the planning process.”*

Furthermore, Section 4.2.2 of the *Guidelines* states, “Any General Plan Amendment that will result in population growth above that forecasted in the most recently adopted AQMP is inconsistent with the AQMP. It will, therefore, have a significant cumulative adverse air quality impact.” Because the proposed project includes a *General Plan Amendment*, the population increase of the RiverPark Project is compared to adopted population projections to determine if the project is inconsistent with current population forecasts and the AQMP.

The *Guidelines* state that the population forecasts contained in the AQMP should be used to determine AQMP consistency. However, if there are more recent population forecasts that have been adopted by the Ventura Council of Governments (VCOG), where the total county population is lower than that included in the most recently adopted AQMP, lead agencies may use the more recent VCOG forecasts for determining AQMP consistency.<sup>10</sup>

The current VCOG population forecasts for the Oxnard Growth Area is 162,623. This figure would then be compared to the growth area population target for the next year. Because the VCOG population figures are provided in five-year increments, the most recent population of the growth area is compared with the 2005 population forecasts. The 2005 VCOG population forecast for the Oxnard Growth Area is 170,215. When the total build-out population expected for the RiverPark Project of 7,217 is added to the current population of 162,623, the total is 169,840. This is below the projected population of 170,215. Therefore, the RiverPark Project would not result growth exceeding adopted population projections. Based on Section 4.2.2 of the *Guidelines*, the project is not considered inconsistent with the population forecast. It should be noted that the methodology for determining consistency with current growth

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<sup>10</sup> Ventura County Air Pollution Control District, *Ventura County Air Quality Assessment Guidelines*, November 2000, p. 4-4, first footnote.

forecasts contained in the *Air Quality Assessment Guidelines* is conservative with respect to the RiverPark Project, as full build-out of the project is not anticipated before 2020.

With regard to transportation and energy control measures that help to reduce project emissions, transportation and energy conservation control measures have been incorporated into the proposed RiverPark Specific Plan. Such measures include, but are not limited to, extensive pedestrian paths and walkways, a complete bicycle circulation system, shade trees along pedestrian and bicycle paths and visually interesting pedestrian and bicycle paths. The mixed-use nature of the project and the planned land use layout emphasizes alternative modes of transportation and energy conservation. Through the integrated pedestrian and bicycle paths, residents will be able to access common destinations without leaving the Specific Plan Area and without using a motor vehicle. These measures have all been included within the proposed Specific Plan and have been accounted for in the air quality modeling air quality modeling through the adopted URBEMIS7G model approved for use by the VCAPCD. Based on Section 4.2 and 4.2.2 of the *Guidelines*, the proposed project does not exceed the VCOG forecasts as described above.

Furthermore, as a *General Plan Amendment* is part of the RiverPark Project, the project would be consistent with the *General Plan* once approved. Because the project is consistent with the AQMP and implements many of the adopted transportation and energy control measures, the project would not result in significant cumulative impacts because of inconsistency with the AQMP.

## MITIGATION MEASURES

### Construction

As stated previously, the APCD does not consider normal construction-related air quality impacts to be significant. However, the APCD does recommend mitigation measures to reduce emissions generated by construction activities. The following are recommended mitigation measures for construction-related air quality impacts.

#### ***Fugitive Dust Mitigation Measures***

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

- 4.8-2 Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.
- 4.8-3 Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities:
- All trucks shall be required to cover their loads as required by California Vehicle Code § 23114
  - All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.
- 4.8-4 Inactive graded and/or excavated areas shall be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.
- 4.8-5 Signs shall be posted on-site limiting traffic to 15 miles per hour or less.
- 4.8-6 During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive.
- 4.8-7 Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

- 4.8-8 Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

### **Valley Fever Mitigation Measures**

- 4.8-9 Hire crews from local populations where possible, since it is more likely that they have been previously exposed to the fungus and are therefore immune.
- 4.8-10 Require crews to use respirators during project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations.
- 4.8-11 Require that the cabs of grading and construction equipment be air-conditioned.
- 4.8-12 Require work crews to work upwind from excavation sites.
- 4.8-13 Pave construction roads.
- 4.8-14 Where acceptable to the fire department, control weed growth by mowing instead of disking, thereby leaving the ground undisturbed and with a mulch covering.
- 4.8-15 During rough grading and site development, the primary access roads into the Specific Plan Area from adjoining paved roadways should be treated with environmentally-safe dust control agents.

### **ROC and NOx Mitigation Measures**

- 4.8-16 Minimize equipment idling time.
- 4.8-17 Maintain equipment engines in good condition and in proper tune as per manufactures' specifications.
- 4.8-18 Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.

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

## Operations Phase

As discussed earlier in this section, the proposed project would generate total emissions that would exceed APCD recommended significance thresholds for ROC and NO<sub>x</sub> emissions. Consistent with the *APCD Guidelines*, site design and land use features have been incorporated into the RiverPark project to reduce potential air quality impacts. Land use design features suggested by the *APCD Guidelines* which have been incorporated into the RiverPark project include:<sup>11</sup>

- Encourage the development of higher density housing and employment centers near public transit corridors.
- Encourage compact development featuring a mix of uses that locates residences near jobs and services.
- Provide services, such as food services, banks, post offices, and other personal services within office parks and other large developments.
- Encourage infill development.
- Ensure that the design of streets, sidewalks, and bike paths within a development encourage walking and biking.
- Provide landscaping to reduce energy demand for cooling.

Additional mitigation measures that shall be implemented to further reduce air quality impacts include:

- 4.8-20 Ensure that there will be adequate child-care facilities and services to serve the Specific Plan area.
- 4.8-21 Incorporate employee locker/shower/changing facilities into all non-residential buildings in the commercial portions of the Specific Plan area.
- 4.8-22 Plant and maintain shade trees and shrubs to reduce heat build-up on structures.
- 4.8-23 The master developer shall work with Caltrans to establish a park-and-ride lot in or near the Specific Plan area.

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<sup>11</sup> Ventura County Air Pollution Control District, *Ventura County Air Quality Assessment Guidelines*, November 2000, p. 1-5.

Contribution to an off-site Transportation Demand Management (TDM) Fund is recommended by the APCD only after all feasible recommended measures have been applied to a project and significant emissions remain.

As shown in **Table 4.8-5**, significant emissions will remain even after all feasible mitigation measures are applied to the project.

**Table 4.8-5**  
**Estimated Operational Emission Reductions - Proposed RiverPark Project, Year 2020**

Emissions Source	Emissions in Pounds per Day, Year 2020	
	ROC	NO <sub>x</sub>
<b>Project Emission Totals:</b>	<b>89.26</b>	<b>198.35</b>
<b>Emissions after Reduction</b>	77.98	157.99
<b>Threshold:</b>	25	25
<b>Exceeds Threshold?</b>	<b>YES</b>	<b>YES</b>
<b>Exceeds Threshold by</b>	<b>52.98</b>	<b>132.99</b>

Source: Impact Sciences, Inc. Emissions calculations are provided in **Appendix 4.8**.

Accordingly, the following mitigation measure is recommended:

**4.8-24** A TDM Fee Program shall be developed for the project and approved by the City of Oxnard prior to the issuance of the first building permit for any individual development project within the Specific Plan Area. This program shall define a methodology for determining the pro-rata share of the total TDM fee to be paid by each individual building project. The total amount of the TDM fee to be paid shall be based on project emissions calculated prior to approval of the first development project under the Specific Plan.

The TDM fees would be paid to the City of Oxnard for spending on emission reducing technologies and programs. The City has previously expended TDM funds to purchase clean fuel vehicles to replace older vehicles in the city's vehicle fleet and to use as matching grant funds to develop and expand bicycle paths. The City of Oxnard spends TDM Funds in a manner consistent with the most recent *APCD Guidelines*. The current guidelines address appropriate TDM fund expenditures on Page 7-19 of the 2000 *APCD Guidelines* and include funding mitigation projects or programs in areas directly or indirectly impacted by the development as well as establishing timelines for the funds to be spent.

## UNAVOIDABLE SIGNIFICANT IMPACTS

No unavoidable significant impacts to air quality will result from the RiverPark Project.