



# Draft Environmental Impact Report New High School No. 8

Oxnard, California  
SCH# 2019029101



August 15, 2019

*In association with:*  
Sage Realty Group, Inc.

# **Draft Environmental Impact Report New High School No. 8 Oxnard, California SCH# 2019029101**

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## EXECUTIVE SUMMARY

This Draft Project Environmental Impact Report (EIR) was prepared by Oxnard Union High School District (OUHSD or the District) to evaluate potential impacts and related mitigation from construction and operation for the proposed New High School No. 8 Project inclusive of curriculum programs (proposed project). The OUHSD proposes to construct and operate a new neighborhood high school with Civic Center Act (CCA) facilities to support up to 2,500 high school students in grades 9-12. As Lead Agency for the California Environmental Quality Act (CEQA), the District has prepared this Draft EIR in compliance with the State CEQA Guidelines.

The content of this EIR was established based on the findings in the Initial Study (IS) and input received from agencies and individuals during the public scoping process. Topics discussed in detail in this EIR include: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Energy, Geology and Soils, Greenhouse Gas (GHG) Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Recreation, Transportation, and Utilities and Service Systems.

This EIR serves as a public disclosure document explaining the effects of the proposed project on the environment, alternatives to the project, and ways to minimize adverse effects and to increase beneficial effects. The EIR will be used by OUHSD and responsible and trustee agencies with jurisdiction over portions of the project prior to deciding whether to approve or permit project components. Findings shall also be presented as applicable.

### Project Location

The project Site includes approximately 49.75 acres of the Maulhardt Property, a 107.25-acre property (APN 214-002-059) located in the City of Oxnard, California. Access to the project Site is provided from Camino Del Sol and Rose Avenue. The geographic coordinates of the Site are approximately Latitude 34°12' 29.47" North, Longitude 119°09' 19.07" West.

Surface elevations at the Site are approximately 54-60 feet above mean sea level (amsl) (Google Earth Pro 2018). The project Site is located in the southern area of the Santa Clara River flood plain. As of March 2017, the Santa Clara River Levee in Oxnard was in the process of rehabilitation construction and undergoing design/engineering/CEQA work (City of Oxnard 2017b). The Santa Clara River is located approximately 2.8 miles northwest of the project Site. The Site topography is relatively flat with surface elevations ranging from approximately 54 feet amsl in the south to 60 feet amsl in the north (Google Earth Pro 2018).

The project Site has a General Plan Land Use designation of Residential Low Medium (RLM) and Open Space (OS), Urban Village. The project Site is located in the Northeast Community Specific Plan (NECSP) area of Oxnard, Ventura County, California. The zoning designations are Single Family Residential Planned Development (R1PD) and Community Reserve (C-R).

The project Site is currently used for agriculture and the cultivation of strawberries was observed during a January 29, 2019 field visit. Historical aerial photographs, Google Earth images, and information from the project Site owners indicate that the Site has been used for cultivation of row crops from as early as 1869 to the present. The Site is adjacent to agricultural land to the north; single family residential land and Rio Rosales Elementary School to the east; single and multi-family residential and commercial land to the south; and single-family residential land to the west. There are three public parks within 0.5-mile of the Site: Del Sol Park to the southwest, Thompson Park to the south, and West Village Park to the northwest.

### Project Description

The OUHSD proposes to construct and operate a new state of the art neighborhood high school to accommodate existing and anticipated future enrollment in the District. The new school facilities are designed to meet the educational and recreational needs of up to 2,500 students in grades 9-12 onsite.

### Legal Lot

Per the current vesting deed (20171124-00152497 O.R.), the existing parcel at the northeast corner of Rose Avenue and Camino Del Sol (APN 214-0-020-595) is essentially one large rectangle with the exception of some road right-of-way dedications along the north side of Camino Del Sol and the east side of Rose Avenue (near Camino Del Sol).

The California statutes pertaining to Subdivision Map Act state that the transfer in ownership of a portion of existing parcel, to a public agency, may be accomplished by recordation of a proper grant deed without the necessity of a subdivision map. The OUHSD qualifies as ‘a public agency’, relative to these statutes. After the recordation of the grant deed transferring title of the school Site parcel to the OUHSD, the remaining portions of the original ‘rectangle’ will consist of two separate (non-adjointing) parcels—one northerly of the school Site parcel and one at the northeast corner of Rose Avenue and Camino Del Sol. If necessary, a Certificate of Compliance can be recorded covering both of these parcels.

### Land Use Planning

Notwithstanding a General Plan or Zoning Amendment, School Districts are not required to comply with the local building ordinances, except for City and/or county ordinances (1) regulating drainage improvements and conditions; (2) regulating road improvements and conditions; and (3) requiring the review and approval of grading plans, to the extent such ordinance provisions relate to the design and construction of on-Site improvements that affect drainage, road conditions and traffic flow.

However, The District shall give consideration to the specific requirements and conditions of City or county ordinances relating to the design and construction of off-Site improvements and related items.

The District is coordinating with the City relative to conformance of its Site use with the existing General Plan and zoning ordinances pursuant to Government Code Sections 65402 and Public Resources Code Section 21151.2.

To the extent any such use is not in conformance, the District either will work with the City for any necessary General Plan and/or Zoning Amendments or consider State Law for overruling such requirements as to applicable school facilities construction per Government Code Section 53094.

### School Facilities

The proposed project would comprise approximately 281,311 square feet (sq. ft.) of building and structures and provide approximately 722 parking spaces on the project Site. In addition, the proposed project includes a variety of recreational areas to accommodate the recreational needs of the student's onsite. These facilities include a variety of play fields, hard courts, and a pool. The proposed buildings would be of wood or metal frame construction or cast in place concrete tilt up construction with concrete slab-on-grade foundations. Access to the school would be provided from Camino Del Sol and half width of a proposed new “Central Road” to the north of the project Site that would connect to the existing Camino De La Luna and Jacinto Drive. The proposed circulation is being planned in cooperation with City Planning, Public Works, and Traffic staff.

### Recreational Facilities and Civic Center Act

This proposed project includes a variety of recreational features including a pool, football/ track and field stadium, baseball/softball fields, soccer fields, tennis courts and basketball courts. A CCA is proposed for community use with the community to provide additional recreation opportunities to the community after school hours. Facilities proposed for community use under the CCA include practice fields, JV baseball and softball fields, pool, outdoor basketball courts, tennis courts, performing arts center, and parking.



## Project Design Features

### *Landscaping*

The landscape concept for the proposed project includes the surfacing and planting of the soft-top sports facilities, Site irrigation, and ornamental plantings of trees, shrubs, and groundcover. The proposed irrigation system includes drip, smart clock, flow sensor, rotor, bubbler, and pop up spray components that would result in the system meeting California Assembly Bill (AB) 1881, Cal Green, and Title 23 (Chapter 2) requirements. Plant species selected would add to the aesthetic appeal of the campus.

### *Lighting*

The proposed project will include necessary lighting for adequate nighttime safety and security. Campus lights will be shielded and directed downward to the extent feasible. Lighted playfields are proposed for the stadium and varsity baseball and softball fields.

### *Energy*

The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient light-emitting diode (LED) lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The parking lots and pathway pole-mounted lighting and sports field lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the project will be an energy-efficient type complying with the most recent energy code.

### *Water Saving Features*

The proposed project will incorporate a state-of-the-art drip irrigation system and a smart clock which automatically adjusts daily based on evapotranspiration (ET). All trees will have a separate valve allowing for water to be provided only as needed. Large turf areas will be irrigated by rotors and small turf areas will be irrigated by spray heads. The irrigation system will incorporate a master valve and flow sensor to shut down the system in case of line breakage.

## Offsite Infrastructure Improvements and Connections

### *Stormwater Drainage*

The proposed project will route storm water from pervious and impervious surfaces via storm drain inlets, curbing, and piping and will continue to discharge to the Rice Road Drain construction. The City of Oxnard will hold the Maulhardt Property (and therefore, the proposed project) to the 1 cubic foot per second per acre (cfs/ac) cfs/ac runoff discharge rate, consistent with the 1987 Rice Road Watershed Agreement referenced in Jensen Design & Survey, Inc.'s *Hydrology Letter* (Jensen Design and Survey, Inc. 2019a). The remaining runoff is designed to be retained on-Site. The 1 cfs/ac flow rate was deemed an acceptable flow rate to prevent downstream flooding of the receiving water (Rice Road Drain). At the time of developing this Draft EIR, the precise routing of the storm water drainage features, discharge location to Rice Road Drain, and size of on-Site detention basins had not been finalized; however, the proposed project will be held to the 1 cfs/ac discharge rate. Proposed features include pre-treatment of runoff from the North and South Campuses with *Downstream Defender* hydrodynamic separators. The treated water would then flow into Advanced Drainage Systems, Inc. (ADS) Stormtech plastic chambers that will be installed under the basketball court area (North Campus) and the parking lot (South Campus). The North Campus will also have an infiltration system under the varsity softball field. Allowable discharges will bypass the ADS Stormtech system, but larger flows will be diverted into the infiltration system to meet City of Oxnard detention requirements. A portion of the runoff from the streets that will be constructed and dedicated to the City of Oxnard

and surrounding the Site will be mitigated by upsizing the North and South Campus detention systems to retain this additional volume of runoff. The current design concept requires review and approval by the City.

#### *Transportation/Circulation*

While the educational facilities would be contained within the project Site; the City may require additional street and sidewalk improvements required to service the proposed project. Anticipated roadway improvements include the widening of Rose Avenue that would require removal of the existing windrow trees. A new half width access road is proposed to the north of the project Site as shown on the conceptual Site map. The City will dictate the final route for the access road. Anticipated sidewalk improvements and other circulation improvements required to adequately accommodate the project Site will be identified based on coordination with the City's Planning and Public Works Departments.

#### *Utility Connections*

The proposed project includes utility connections, including required improvements needed to provide adequate service to the Site for water, sewer, gas, electric, data/telecommunications, and storm water in compliance with existing regulations.

#### Project Construction

Phased construction is anticipated to begin in February 2020 and would take approximately 25 months to construct. The project construction activities are anticipated to occur in phases and include grading, building construction, paving, building interiors, and off-Site street work; some portions of construction phases will occur concurrently with other phases. Project construction shall be under the supervision of the OUHSD and state inspector as applicable.

Anticipated construction equipment includes graders/compactors, backhoes, bulldozers, excavators, pavers, and water trucks. During the building construction phases, material delivery trucks, including tractor trailers, would be bringing raw and finished materials and equipment. Paving for parking areas and hardcourts are expected to be asphalt. Concrete for foundations floor slabs and walkways and plazas shall be delivered via concrete mixing vehicles.

The number of construction workers at the proposed project Site would vary day by day. Typical days would have an average of 30 personnel on-Site, while peak levels may reach 150 personnel, depending on activities and the project schedule. Personnel working on the project Site will park on-Site. Contractor field personnel for each phase would typically include a project superintendent, assistant superintendent, and a clerk. A project manager may also be assigned to be on-Site for a portion of each work day. One project inspector is expected to be on-Site for each phase. Specialty inspectors would be on-Site for various activities such as welding or masonry. Periodically architects, engineers, public agency and District staff would be on-Site to review progress (typically weekly).

#### Operation and Staffing

Operation of the new high school is anticipated for the 2022-2023 school year. The approximate number of employees for the high school opening was estimated to be 150 based on the educational specifications approved by the District Board. This includes administrative staff, teachers, coaching staff, aides, librarians, technology teachers, cafeteria workers, janitors and groundskeeping staff.

#### **Anticipated Permits and Approvals**

The EIR will be used by OUHSD and responsible and trustee agencies with jurisdiction over portions of the project prior to deciding whether to approve or permit project components. A public agency, other than the lead agency, that has discretionary approval power over a project is known as a "responsible agency" as defined by CEQA Guidelines Section 15381. Anticipated permits and approvals for the proposed project are identified in the table below.



### Anticipated Permits and Approvals

Agency	Permit/Approval
Oxnard Union High School District	Approve Project (Educational Specifications, Design/Construction Funding and Associated Contract Approvals)/ EIR/ Parks Designation
City of Oxnard	Building Permits, Utilities, and Traffic/Adjacent Street Requirements
California Department of General Services, Division of State Architect	Approval of construction plans and CDE Site and Plan Approval
California Department of Toxic Substances Control	Approval of Preliminary Environmental Assessment (PEA) and Supplemental Site Investigation (SSI)
Los Angeles Regional Water Quality Control Board	Storm Water Pollution Prevention Plan
Office of Public School Construction (OPSC)	Approval of District/ Division of the State Architect (DSA)/ CDE State Matching Funds
California Department of Education (CDE)	Approval of construction plans and CDE Site and Plan Approval

### Known Areas of Controversy

Areas of controversy include known issues or concerns raised by agencies and the public regarding the proposed project. Known issues of concern to OUHSD are based on preliminary agency consultation, public scoping meeting comments, and comment letters received in response to the NOP (Appendix A). The general key areas of known controversy and the location where the issue is addressed in the EIR are provided in the table below.

#### General Areas of Known Controversy

Area of Concern	EIR Section Where Topic is Addressed
Development of Remaining Portions of the Maulhardt Property	Section 2.5 Cumulative Project List Section 3.0 Environmental Analysis (cumulative evaluation for each resource topic)
Agriculture Mitigation	Section 3.2 Agriculture

### Significant Unavoidable Impacts

Impacts related to agricultural land conversion (Agriculture and Forestry Resources) and windrow tree removal (Aesthetics) were found to be significant and unavoidable. All other topics would be less than significant or less than significant with mitigation incorporated.

### Alternatives

Alternatives considered in this EIR include:

- No Project Alternative – This alternative assumes that improvements described for the proposed project would not be implemented. OUHSD would not implement any changes to the project site that would result in changes to existing project site or existing agricultural uses. Under the No Project Alternative, it is assumed that increases in enrollment would have to be accommodated by existing OUHSD high schools.

- Limited Expansion of Existing High Schools Alternative A -- This alternative assumes that improvements to existing OUHSD high schools, beyond what is currently planned, would be required to address school capacity.

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. This would ideally be the alternative that results in fewer (or no) significant and unavoidable impacts. CEQA Guidelines Section 15126(d)(2) states that if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

The following table provides a comparison of each alternative. The No Project Alternative would result in no impacts to any of the issue areas except to public schools. The District would have to accommodate existing and anticipated future students at other District high schools that could result in adverse impacts to public schools.

The Limited Expansion of Existing High Schools Alternative A would have similar or greater impacts in some issue areas and reduce impacts in other issue areas, however, this alternative would not result in the significant and unavoidable impacts to agricultural land conversion (Agriculture and Forestry Resources) and windrow tree removal (Aesthetics). The No Project Alternative would be the environmentally superior alternative but would not meet any of the five Project Objectives. The environmentally superior development alternative would likely be the Limited Expansion of Existing High Schools Alternative A since this alternative would not result in the significant and unavoidable impacts to agriculture and forestry resources and aesthetics and some of the five Project Objectives would be met.

### Summary of Project Alternatives

Issue Area	Proposed Project	No Project	Limited Expansion Alternative A
Aesthetics	S	NI	LTS
Agriculture	S	NI	NI
Air Quality	LTS/M	NI	LTS/M
Biological Resources	LTS/M	NI	LTS
Cultural and Tribal Cultural Resources	LTS/M	NI	LTS
Energy	LTS	NI	LTS
Geology and Soils	LTS/M	NI	LTS/M
Greenhouse Gas Emissions	LTS	NI	LTS
Hazards and Hazardous Materials	LTS	NI	LTS
Hydrology and Water Quality	LTS/M	NI	LTS
Land Use and Planning	LTS	NI	NI
Noise	LTS/M	NI	LTS/M
Public Services	LTS	S	LTS
Recreation	LTS	LTS	LTS
Transportation	LTS/M	NI	LTS
Utilities and Service Systems	LTS/M	NI	LTS

NI No Impact

LTS Less Than Significant

LTS/M Less Than Significant with Mitigation

S Significant and Unavoidable

### Summary of Environmental Impacts

Provided in the table herein is a summary of the environmental issues discussed in the EIR, level of significance before mitigation, mitigation measures (when warranted), and the level of impact after mitigation.



**Summary of Project Impacts, Mitigation Measures and Level of Impact After Mitigation**  
**New High School No. 8 Project**  
**Oxnard Union High School District**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<b>3.1 Aesthetics</b>			
<p><i>Would the project have a substantial adverse effect on a scenic vista?</i></p>	<p><b>Significant Impact.</b> The scenic route portions of Rose Avenue are located to the west of the project Site. The proposed project does not involve development on the Oxnard-Camarillo Greenbelt or to the Maulhardt Property adjacent to the project Site to the west, and therefore will not directly damage these scenic resources. Views of the Los Padres Mountains from the scenic route portion of Rose Avenue would remain unobstructed. Windrow trees are located on the east side of Rose Avenue between Camino del Sol and Cesar Chavez Drive.</p> <p>The project would result in a reduction of the agricultural land which is currently part of the Maulhardt Property. The replacement of agricultural land with school uses may appear inharmonious with the ranch portions of the Maulhardt Property to remain. Cumulative indirect visual impacts of the project, which have the potential to visually alter the characteristics of the historic ranch buildings and diminish their integrity, will require mitigation. Provenience Group, Inc. (PGI) recommends mitigation that will entail planting a thick row of tall trees and bushes along the east and north sides of the existing historic buildings present on the Maulhardt Property to visually obscure the school complex from the historic ranch buildings. The mitigation associated with indirect impacts to historic resources is further discussed within Section 3.5, <i>Cultural and Tribal Cultural Resources</i>.</p> <p>The proposed project includes roadway improvements to Rose Avenue that would require</p>	<p><b>AES-1:</b> Removal of windrow trees shall be subject to the following requirements:</p> <ul style="list-style-type: none"> <li>A certified arborist report shall be required, which contains a description of the health of each tree.</li> <li>A tree valuation report shall be provided for each tree (as prepared by a certified arborist) based upon, <i>Valuation of Landscape Trees, Shrubs, and Other Plants</i> (an official publication by the International Society of Arborists).</li> <li>Tree rows authorized for removal shall be replaced and/or additional landscape enhancement shall be provided to the same dollar value as the trees designated to be removed. This is in addition to the minimum landscaping required per the City's Landscape Standards. The species to be replanted shall be approved by the Oxnard Parks Division.</li> </ul>	<p>Significant Unavoidable Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	removing the mature existing windrow trees found on the east side of Rose Avenue. City of Oxnard 2030 General Plan Goals and Policies include the protecting and enhancing scenic resources including windrows. Removal of these trees would result in the loss of a significant scenic resource, resulting in a significant impact. Implementation of Mitigation Measure AES-1 reflects the East Village Phase III Annexation EIR and the Northeast Community Specific Plan guidelines designed to minimize this impact. This would include use of mature existing trees where feasible and replacement criteria when existing mature tree removal is necessary. While this measure will reduce the impact, the loss of the windrow trees would remain a significant and unavoidable impact.		
<i>Would the project, in non-urbanized areas substantially degrade the existing visual character or quality of public views of the Site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</i>	<b>Less than Significant Impact.</b> Within the immediate project vicinity, the area can be characterized as urban with a mix of residential, school, park, commercial, and agricultural uses. Implementation for the proposed project would change the character of the project Site from agricultural to developed with school uses, resulting in a developed character and a higher intensity of activity at the project Site. Visual impacts would result from temporary construction activities, including the presence of construction equipment, materials, and workers, at the project Site, and along Rose Avenue and Camino del Sol. Vehicles such as automobiles, pickup trucks, and dump trucks would be visible. Construction activities would be temporary and short-term and thus would have minimal effect on aesthetics and visual quality, resulting in a less than significant impact, and no mitigation measures are required. Development of the project Site would change the visual character	No mitigation is required.	Less than Significant Impact



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>of the project Site by introducing new buildings and structures to the Site in comparison to existing conditions. The project would be consistent with the visual character of future development anticipated under the City of Oxnard General Plan for the project Site area. As shown in Figure 4-2 of the City of Oxnard General Plan, <i>Potential Public School Locations</i>, the project Site was considered a possible location for a public school. The project would represent the continuation of existing City-wide land use patterns and proposed new development on land used for agricultural uses (City of Oxnard 2011a). The ranch portions of the Maulhardt Property to remain, which include a residence and agricultural buildings, are not located on the project Site, and the visual character of the farmstead would not be changed as part of the proposed project. The project would change the existing agricultural character of the project Site, which would contrast with the density and style of the buildings found on the farmstead. This change to the project's visual characteristics, however, would represent a built character that has already been contemplated for this area and is found in the surrounding development. Therefore, these changes to the project Site's visual character and quality would be less than significant, and no mitigation measures would be required.</p>		
<p><i>Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</i></p>	<p><b>Less than Significant Impact.</b> The proposed project would install street lighting on the proposed access road from Camillo del Sol. The proposed project will include exterior lighting around the buildings and for walkways and parking as needed for adequate safety and security at night. In addition, lighted playfields are proposed for the stadium and varsity baseball and softball fields. The</p>	<p>No mitigation is required.</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>operation of the proposed lighting system would not result in significant adverse impacts related to light trespass. In urbanized locations the most common adverse effect of light trespass is disruption of sleep. Although the proposed project would create spill light that would result in light trespass during pre-curfew hours, lighting would be extinguished by 10:30 p.m. at the latest. Furthermore, the nearby residential areas are located in an area of medium ambient brightness and the small increase in light trespass is considered a less than significant impact. Discomfort glare is typically measured in terms of candelas, which is a unit of measurement based on luminous power per unit solid angle emitted by a point light source in a particular direction. The expected light intensity of the proposed project does not exceed the threshold of 10,000 candelas. All lighting and materials used within the proposed project will be efficient and consistent with the lighting principles contained in the Community Design Element of the City of Oxnard General Plan (City of Oxnard 2011a) and the Oxnard Municipal Code (City of Oxnard 2017a), that require that all outdoor lights be designed, located, and arranged so as to reflect the light away from adjoining properties or streets. The proposed project would introduce new lighting to the Site. However, the lighting for the proposed project will be consistent with the City of Oxnard General Plan (City of Oxnard 2011) and the Oxnard Municipal Code requirements, and the additional light created by the project would not exceed obtrusive lighting thresholds; therefore, the project would not significantly alter the nighttime character of the area. Impacts resulting from light/glare would be less than significant, and no mitigation measures are required.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>Cumulative Aesthetic Impacts</i>	<b>Less than Significant Impact.</b> The development of the proposed project with non-agricultural uses was contemplated for this area in the City of Oxnard General Plan. The City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) evaluated the potential environmental impacts of buildout of the 2030 General Plan, including the project area. The 2030 General Plan Program EIR found that, while this development would have impacts related to scenic routes, visual character, and light and glare, these impacts would be less than significant and would not require mitigation. As the proposed project would be consistent with development contemplated for this area in the City of Oxnard General Plan, the proposed project's incremental contribution to impacts associated with visual quality and character would be less than significant with no additional mitigation.	No mitigation is required.	Less than Significant Impact

### 3.2 Agriculture and Forestry Resources

<i>Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</i>	<b>Significant Impact.</b> The City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) accounted for the conversion of up to 2,215 acres of important farmland (defined as Prime Farmland and Farmland of Statewide Importance) including the project Site to non-agricultural use and determined the impact to be significant and unavoidable. The entire Maulhardt Property was identified as either Prime Farmland or Farmland of Statewide Importance. Mitigation measure AG-1 is provided as partial mitigation measure for the loss of important farmland. Nonetheless, conversion of agricultural land at the project level would remain a significant and unavoidable impact.	<b>AG-1:</b> In accordance with the mitigation described in the 2030 General Plan EIR and East Village Phase III EIR for the loss of prime agricultural soils, the OUHSD shall: <ul style="list-style-type: none"> <li>Offer at cost the top 12 inches of the Prime Farmland soils for relocation to a farm site or farm sites that have lower quality soils. The cost will include suitable replacement soil, if needed for Site improvements.</li> </ul>	Significant Unavoidable Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>Cumulative Agriculture and Forestry Resources Impacts</i>	<b>Less than Significant Impact.</b> Through the development of the proposed project and other development contemplated for this area in the City of Oxnard General Plan, the character of the project area would increasingly change from agricultural to urban. The City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) evaluated the potential environmental impacts of buildout of the 2030 General Plan, including the project area. The 2030 General Plan Program EIR found that the conversion of agricultural land to urban uses is a significant and unavoidable impact. This was analyzed again in the NECSP EIR and East Village Phase III Annexation EIR with the same conclusion. However, as the proposed project would be consistent with the residential and other development in this area in the City of Oxnard General Plan, the proposed project's contribution to impacts associated with agricultural resources would not be any greater than already analyzed.	No mitigation is required.	Less than Significant Impact

### 3.3 Air Quality

<i>Would the project conflict with or obstruct implementation of the applicable air quality plan?</i>	<b>Less than Significant Impact.</b> The project Site is designated as a potential public school location in the General Plan. The proposed project would not induce substantial population growth into the area either directly or indirectly. The student population would be part of the existing and projected growth for the City as accounted for in the General Plan. In general, K-12 schools accommodate growth as a result of other land use decisions in the City such as the construction of new homes or the creation of a substantial number of new jobs that encourages new people to move into the area. No housing is proposed as a part of the project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	support staff. Most or all the additional staff could be hired from the existing qualified applicant pool already residing within or near the District. However, if teachers or other staff are hired outside the District area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the existing local population. The proposed project includes educational facilities that would accommodate existing and projected student enrollment in the District and the requirement for local schools to service the City of Oxnard. The proposed project would not result in population growth above what is forecasted in the 2030 General Plan and in turn the 2016 Air Quality Management Plan (AQMP). Therefore, the proposed project would not conflict or obstruct implementation of the applicable 2016 AQMP and project impact would be less than significant.		
<i>Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area under an applicable federal or state ambient air quality standard?</i>	<p><b>Potentially Significant Impact During Construction.</b> The proposed project is located within the City of Oxnard, in Ventura County, which is subject to Ventura County Air Pollution Control District (VCAPCD) regulations. The release of various criteria pollutants from both short-term construction and long-term operation related activities for the proposed project are expected.</p> <p><b>Short-term Emissions.</b> VCAPCD does not have significance thresholds for construction emissions due to the fact that construction emissions occur only on a temporary basis and do not contribute to long-term air quality impacts. Thus, emissions resulting from the proposed project would not be expected to have a significant impact on the environment and no mitigation measures would be required. However, the following Mitigation Measure</p>	<p><b>AQ-1:</b> In accordance with standard practice pursuant to the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations during project construction the contractor shall ensure that:</p> <ul style="list-style-type: none"> <li>All soil excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed soil areas. Watering shall be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations.</li> </ul>	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>AQ-1 is provided to minimize fugitive dust emissions in compliance with the Oxnard General Plan and VCAPCD and to ensure compliance with VCAPCD Rules and CARB off-road regulations in accordance with VCAPCD recommendations for construction emissions exceeding the county's thresholds of significance of 25 pounds per day for NO<sub>x</sub> and SO<sub>x</sub>. With compliance with Mitigation Measure AQ-1, project impact would be less than significant.</p> <p><b>Long-term Emissions.</b> Since the proposed project's long-term emissions are less than established thresholds of significance, and its land use is not anticipated to provide for increase population growth above what is forecasted in the General Plan, the proposed project would not result in a cumulative considerable net increase of any criteria pollutant for which the region is non-attainment. Therefore, the proposed project would have less than significant cumulative impacts.</p>	<ul style="list-style-type: none"> <li>• All clearing, earth moving, and excavation activities shall cease during periods of winds greater than 20 miles per hour (mph) (averaged over one hour), if disturbed material is easily windblown, or when dust plumes of 20% or greater opacity impact public roads, occupied structures, or neighboring property.</li> <li>• All fine material transported off-Site shall be either sufficiently watered or securely covered to prevent excessive dust.</li> <li>• All haul trucks shall be required to exit the Site via an access point where a gravel pad or grizzly has been installed.</li> <li>• Stockpiles of soil or other fine loose material shall be stabilized by watering or other appropriate method to prevent wind-blown fugitive dust.</li> <li>• Once initial leveling has ceased, all inactive soil areas within the construction Site shall either be seeded and watered until plant growth is evident, treated with a dust palliative, or watered twice daily until soil has sufficiently crusted to prevent fugitive dust emission.</li> </ul>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
		<ul style="list-style-type: none"> <li>On-Site vehicle speed should be limited to 15 mph.</li> <li>All areas with vehicle traffic should be paved, treated with dust palliatives or watered a minimum of twice daily.</li> <li>Properly maintain and tune all internal combustion engine powered equipment;</li> <li>Require employees and subcontractors to comply with the CARB idling restrictions for compression ignition engines; and use California ultra-low sulfur diesel fuel; use construction equipment with Tier 2 engines; and use interior and exterior paint with a VOC content of 100 grams per liter.</li> </ul>	
<i>Would the project expose sensitive receptors to substantial pollutant concentrations?</i>	<b>Less than Significant Impact.</b> The Site is adjacent to agricultural land to the north; single family residential land and Rio Rosales Elementary School to the east; single and multi-family residential and commercial land to the south; and single-family residential land to the west. The proposed project is a public school that qualifies as a sensitive receptor (i.e., a facility serving populations likely to suffer adverse health effects from pollution, such as children and the elderly). The location of the project Site is not expected to expose students to sources of substantial pollutant concentrations (e.g., industrial facilities emitting odorous or hazardous substances). Adjacent agricultural land use is consistent with the Oxnard General Plan and agricultural operations are not expected to expose	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>receptors (e.g., school staff and students to substantial pollutant concentrations. In accordance with Goal CD-6 of the Oxnard General Plan, the proposed project includes buffer between agricultural fields and classrooms in the form of soccer, baseball, softball and football fields as well as tennis courts and parking lots. During construction, construction activities would generate particulate matter emissions resulting from the combustion of diesel fuel by construction equipment. The VCAPCD has neither adopted nor recommended methodology for assessing health risk analysis associated with mobile sources at construction sites. The Office of Environmental Health Hazard Assessment (OEHHA), in its Guidance Manual for Preparation of Health Risk Assessments associated with stationary sources, recommends that a 30-year exposure duration be used as the basis for estimating cancer risk at the maximum exposed individual resident in the Hot Spots Program and the 9- and 70- year cancer risk as supplemental information (OEHHA 2015). The Hot Spot Program is aimed at stationary (as opposed to temporary construction) sources and long-term exposure construction of the proposed project would not result in long term exposure to nearby residents. Thus, construction activities associated with the proposed project are expected to have a less than significant impact on sensitive receptors or nearby residents. Operation of the proposed project has the potential to contribute to traffic volumes in the nearby roadway system. Congested intersections have the potential to result in localized high levels of carbon monoxide (CO), which results from incomplete combustion of carbon containing fuels (e.g., gasoline and diesel). CO exposure can have a significant impact on sensitive</p>		



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	receptors. To this end, A CO analysis was conducted for intersections expected to be impacted by the implementation of the proposed project, and no significant impacts associated with CO emissions were found during the analysis.		
<i>Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</i>	<b>Less than Significant Impact.</b> While the project would be adjacent to agricultural fields, the types of crops grown at these fields are not anticipated to create objectionable odors. Additionally, VCAPCD Rule 51 (Nuisance) exempts odors emanating from agricultural operations necessary for the growing of crops from being classified as nuisance. This exemption is consistent with the California Health and Safety Code Section 41705. Emissions from construction equipment will be temporary and are not listed as odorous sources in the Guidelines. Thus, odor emissions from construction operations are not expected to have an adverse impact on receptors in nearby businesses and housing. Operation of the proposed project is not expected to create objectionable odors since its primary function is to provide educational services. Based on this analysis, the proposed project is not expected to result in objectionable odors affecting a substantial number of people and project impact would be less than significant.	No mitigation is required.	Less than Significant Impact
<i>Cumulative Air Quality Impacts</i>	<b>Less than Significant Impact.</b> The proposed project would result in significant cumulative impacts if it exceeds daily thresholds of significance established by VCAPCD or if it incurred in an increase of emissions beyond what is planned in the City of Oxnard General Plan. As noted above, the proposed project would not result in significant cumulative impacts since it does not exceed daily thresholds of significance established by VCAPCD or result in an increase in emissions beyond what is	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	planned in the City of Oxnard General Plan and thereby the applicable AQMP. Project contribution toward cumulative impacts would be less than significant.		

### 3.4 Biological Resources

<p><i>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 CDFW or USFWS?</i></p>	<p><b>Potentially Significant Impact during Construction.</b> The project Site is located within an urban area of the City of Oxnard, and is not located within or directly adjacent to any known or mapped wildlife corridors or nursery sites. Accordingly, the potential for candidate, sensitive, or special-status species or habitats is low within City limits. The project Site is currently used for the cultivation of strawberries. Agricultural land can be considered suitable habitat for burrowing owl (<i>Athene cunicularia</i>), dependent upon the presence of burrowing mammals or suitable surrogate burrows. The nearest California Natural Diversity Database (CNDDDB) burrowing owl occurrence is approximately 3 miles from the project Site. No burrows, sedentary above ground pipes, or sedentary rip rap that could serve as suitable burrow habitat for burrowing owl were observed on Site during the project-specific biological Site visit conducted on January 29, 2019; therefore, the potential for burrowing owl to occur on the project Site is low. While the potential for burrowing owl to occur on Site is low, burrowing owl may attempt to colonize an area that would be impacted by the proposed project if suitable burrow habitat becomes available prior to commencement of construction activities. The use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb burrowing owl, if present. direct removal of trees, use of heavy machinery, and/or significant ground disturbance</p>	<p><b>BIO-1:</b> A preconstruction nesting bird survey shall be conducted by a qualified biologist prior to tree removal, the use of heavy machinery, or significant ground disturbance if activities are to be conducted within the bird nesting season (February 15–September 15). The survey shall be required within 72 hours prior to the commencement of construction activities if they occur in the bird nesting season. The survey shall occur within the Site and a 250-foot buffer area around the Site, access permitting, which will include any adjacent trees. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. If birds are found to be actively nesting within the project Site or within 250 feet of the work area, an appropriate exclusionary buffer around the active nest shall be established by the qualified biologist. The buffer distance will be determined based on the nesting species. No construction activities</p>	<p>Less than Significant Impact</p>
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>during construction activities has the potential to disturb nesting birds, including special status bird species, if present. The proposed project includes roadway improvements that would require removal of the existing eucalyptus windrow trees along Rose Avenue. With implementation of mitigation measures BIO-1, BIO-2, and BIO-3, project impacts to special status species would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 15 to September 15.</p>	<p>would be allowed within the buffer until the birds have fledged from the nest. Active nests and buffers would be monitored as needed by a qualified biologist to determine if active nests are being adversely affected by project activities. At a minimum, a qualified biologist would visit an active nest weekly to determine the status of the nest. Only when the nest becomes inactive (nestlings have fledged) will the buffer and biological monitoring no longer be needed.</p> <p><b>BIO-2:</b> A preconstruction survey for burrows and burrowing owl shall be conducted by a qualified biologist prior to the use of heavy machinery and/or significant ground disturbance associated with construction activities. The survey shall be required within 5 days prior to the commencement of construction activities, and shall occur within the Site and a 150-foot buffer area around the Site, access permitting. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. Should a suitable burrow and/or burrow surrogate (&gt;11 cm in diameter (height and width) and &gt;150 cm in depth) (Johnson et al. 2010) be identified on Site or within the 150-</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
		<p>foot project Site buffer, wintering and nesting season surveys shall be conducted in accordance with the guidelines described in the <i>CDFW Staff Report on Burrowing Owl Mitigation, 2012</i> (CDFW 2012). If burrowing owls are detected within the project Site or within the 150-foot project Site buffer, no construction work can occur, and the CDFW shall be contacted immediately to develop and implement a mitigation plan to protect burrowing owls and their nest sites. The burrowing owl survey can be conducted in conjunction with the nesting bird survey, if timing is appropriate.</p> <p><b>BIO-3:</b> Any construction materials stored on-Site that could serve as a burrow surrogate for burrowing owl, such as sedentary above ground pipes or sedentary rip rap, shall be covered when not in use as to not attract burrowing owls to the project Site.</p>	
<p><i>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?</i></p>	<p><b>Potentially Significant Impact during Construction.</b> The project Site is located within a developed urban environment. The project Site is not located within, or directly adjacent to, any known or mapped wildlife corridors or nursery sites. The eucalyptus windrow trees located at the western project Site border, and other vegetation and structures within and adjacent to the Site have the potential to serve as habitat for nesting birds. The general biological survey was conducted outside of the bird nesting season. However, one inactive nest</p>	<p>Refer to Mitigation Measure BIO-1 above.</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>was observed within the eucalyptus windrow trees at the western project Site border. These eucalyptus trees have the highest potential to support nesting activity; additionally, other vegetation and structures within and adjacent to the Site have the potential to serve as habitat for nesting birds. Therefore, direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds if present. The proposed project includes roadway improvements that would require removal of the existing eucalyptus windrow trees along Rose Avenue. With implementation of mitigation measure BIO-1, project impacts to the movement of any native resident or migratory wildlife species, established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 15 to September 15.</p>		
<p><i>Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</i></p>	<p><b>No Impact.</b> There are eucalyptus windrow trees located at the western project Site border, adjacent to Rose Avenue. The infrastructure improvements proposed for Rose Avenue would require the removal of these eucalyptus windrow trees. The City of Oxnard does not have a tree preservation policy or ordinance, and the removal of windrow trees has been identified as a visual impact (discussed in Section 3.1, <i>Aesthetics</i>) and not a biological impact. Therefore, the removal of the eucalyptus windrow trees would not conflict with any local policies or ordinances protecting biological resources, and no impact would result.</p>	No mitigation is required.	No Impact



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>Cumulative Biological Resources Impacts</i>	<b>Less than Significant Impact.</b> Cumulative impacts are incremental effects of an individual project when combined with effects of past, current, and potential future projects. Because the project Site is active agricultural land with very little natural habitat surrounding the Site and would be infill of development within an urban area, cumulative impacts to biological resources would be less than significant.	No mitigation is required.	Less than Significant Impact
<b>3.5 Cultural and Tribal Cultural Resources</b>			
<i>Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?</i>	<b>Less than Significant Impact.</b> The proposed project Site lacks any buildings or structures and is currently used for agriculture row crops. The records search and Native American Heritage Commission (NAHC) sacred lands search did not identify any known historical resources within or adjacent to the project Area of Potential Effect (APE). The Phase I archaeological survey and Extended Phase I limited archaeological testing did not identify any historic resources pursuant to Section 15064.5, therefore the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	No mitigation is required.	Less than Significant Impact
<i>Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5</i>	<b>Potentially Significant Impact during Construction.</b> The records search, NAHC sacred land search, and tribal outreach did not identify any archaeological sites within or adjacent to the project APE. The Phase I archaeological survey and Extended Phase I limited archaeological testing identified on multicomponent archaeological site (OUHS -1). Based on the archaeological testing, all recovered artifacts were recovered from disturbed soils (plow zone: 0-60 centimeters). Although no intact midden or artifacts were recovered from any	<b>CUL-1: Worker Environmental Awareness Training.</b> Prior to any proposed construction ground disturbing activities within the project APE, the District Project Manager shall require the construction contractor to provide for all non-cultural resources personnel to be briefed, by a qualified project archaeologist (retained on-call by construction contractor) about the	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>of the shovel test pits during the extended phase I archaeological testing, it is plausible that pockets of intact midden or prehistoric features could still be present below the subsurface disturbance zone. The project Site is located in an active alluvial depositional setting, and buried, intact, archaeological (prehistoric or historic) materials may be present in previously undisturbed native soils beneath the disturbance. Disturbance of these intact buried resources would be a significant impact. Incorporation of Mitigation Measures CUL-1 (Worker Environmental Awareness Training) and CUL-2 (Archaeological Monitoring), below, would reduce the potential impact on archaeological resources to less than significant.</p>	<p>potential and procedures for an inadvertent discovery of prehistoric and historic archaeological resources. In addition, the training will include established procedures for temporarily halting or redirecting work in the event of a discovery, identification and evaluation procedures for finds, and a discussion on the importance of, and the legal basis for, the protection of archaeological resources. Personnel will be given a training brochure/handout regarding identification of cultural resources, protocols for inadvertent discoveries, and contact procedures in the event of a discovery.</p> <p><b>CUL-2: Archaeological Monitoring Plan and Monitoring.</b> Should project construction ground disturbing activities reach depths containing undisturbed native soils (below 60 inches), then an archaeological monitoring plan and monitoring will be required. A qualified project archaeologist shall prepare an archaeological monitoring plan and a qualified archaeological monitor and Native American monitor (if requested) will be present on-Site during ground disturbing activities that occur within native soils. If any cultural resources are identified by the monitor(s) during ground disturbing activities, the resource will be treated as an</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
		<p>inadvertent discovery and the protocols outlined in the monitoring plan will be adhered to. In general, if cultural resources are encountered during ground disturbing activities in native soils, the archaeological monitor will stop work within 100-feet of the find in order to assess its significance. Construction activities can continue outside the established 100-foot radius exclusion zone. Work may not resume within the 100 feet exclusion zone until the project archaeologist can evaluate the significance of the find and complete any necessary recordation and evaluation of the find (may include recording, testing and/or data recovery efforts) in consultation with the District. Construction will not proceed within the 100-foot area around the discovery until the appropriate approvals are obtained. If requested by interested Tribes, a Native American Monitor will also be present during construction ground disturbing activities. A final report documenting the results of the monitoring program will be prepared by the qualified project archaeologist.</p>	
<p><i>Would the project disturb any human remains, including those interred outside of dedicated cemeteries?</i></p>	<p><b>Potentially Significant Impact during Construction.</b> There are no known human remains or burials within the project APE. The record search nor the NAHC sacred land file search identified any known burials or recorded human remains. Tribal</p>	<p>Refer to Mitigation Measures CUL-1 and CUL-2 above.</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>outreach indicated the area is sensitive for tribal cultural resources, including burials. As with archaeological resources, it is possible that previously unknown human burials or remains could be disturbed on site during project construction. As discussed above, human occupation within the Oxnard Plain has been documented to at least 5000 years ago and likely include the project APE.</p> <p>California state law requires all project excavation activities to halt if human remains are encountered and the County Coroner must be notified. Any discovery of human remains on the project Site would be treated in accordance with PRC Section 5097.98 and Section 7050.5 of the State Health and Safety Code.</p> <p>The specific State law/regulations regarding proper handling of previously unknown human remains encountered during construction are specified within Section 3.5 <i>Cultural and Tribal Cultural Resources</i>, and the project will comply with the state law/regulations to avoid significant impacts on human remains. In conjunction with the training and monitoring protocols identified in Mitigation Measure CUL-1 and CUL-2, potential impacts to unknown human remains is less than significant.</p>		
<p><i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and</i></p>	<p><b>Less than Significant Impact.</b> The records search, NAHC sacred lands search, and tribal outreach did not identify any historical resources within the project area. As a result, it is believed the proposed project would not cause a substantial adverse change in the significance of a known historic resource as defined in PRC 5020.1 (k) and no mitigation is required.</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<p>scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>i.) 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</p>			
<p>ii.) 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 the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<p><b>Potentially Significant Impact during Construction.</b> The records search, NAHC sacred lands search, and tribal outreach did not identify any significant tribal cultural resources within the project area. Tribal outreach conducted by PGI indicates that the project region is sensitive for tribal cultural resources. As noted above, the project Site is located in an active depositional setting, and buried, intact, tribal cultural resources may be present in previously undisturbed soils beneath the disturbance zone. Disturbance of these intact buried resources would be a significant impact. Incorporation of Mitigation Measures CUL-1 (Worker Environmental Awareness Training) and CUL-2 (Archaeological Monitoring), below, would reduce the potential impact on tribal cultural resources to less than significant.</p>	<p>Refer to Mitigation Measures CUL-1 and CUL-2 above.</p>	<p>Less than Significant Impact</p>
<p><b>Cumulative Cultural and Tribal Cultural Resources Impacts</b></p>	<p><b>Potentially Significant Impact.</b> Based on the literature and records review (as described above), the project Site is in a part of coastal California with documented prehistoric and historic occupation. The cumulative impact study area for cultural</p>	<p>Refer to Mitigation Measures CUL-1 and CUL-2 above.</p> <p><b>CUL-3: Maulhardt Property Landscaping Treatment Plan.</b> To shield the view of the existing</p>	<p>Less than Significant Impact</p>



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>resources is coastal Ventura County and the Channel Islands (specifically, the Oxnard Plain), covering areas occupied by Native Americans through historic contact and immigrant populations (e.g. Europeans, Mexicans). Although no significant historic or archeological resources are documented in the project area, unidentified buried resources may exist. Varied cultural resources are documented throughout this part of coastal California suggesting it is a highly sensitive region for archaeological resources.</p> <p>The proposed project is located on the east and north sides of the historic Maulhardt Property, which was previously recommended eligible for the National Register of Historic Places, California Register of Historical Resources (California Register) and as a Ventura County Landmark by San Buenaventura Research Associates in 2014. Cumulative indirect visual impacts of the project, which have the potential to visually alter the characteristics of the historic ranch buildings and diminish their integrity, will require mitigation. PGI recommends mitigation that will entail planting a thick row of tall trees and bushes along the east and north sides of the existing historic buildings present on the Maulhardt Property to visually obscure the school complex from the historic ranch buildings.</p> <p>The proposed project could result in cumulative indirect visual impacts to ranch buildings present on the Maulhardt Property that have been previously documented as a historic resource. Impacts to archaeological resources, historic resources other than the identified ranch buildings present on the Maulhardt Property, and human burials are not anticipated, however impacts could occur to undocumented resources as a result of disturbance</p>	<p>historic buildings present on the Maulhardt Property that will remain in place from the proposed development, a landscaping treatment plan (design) will be required. The landscape design will be implemented to the north and east of the existing historic buildings present on the Maulhardt Property that will remain in place and include planting of vegetation such as a row of tall trees and bushes to visually obscure the school complex from the historic ranch buildings. The design will follow the guidelines set forth in the <i>Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings</i> or the <i>Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings</i> (NPS 2017). Before final approval, the proposed landscape design will be reviewed by a qualified architectural historian professional(s) to ensure the design meets the Secretary of the Interior's Standards and Guidelines.</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	of native soils during project construction. With the implementation of Mitigation Measures CUL-1 – CUL-3, project impacts on cultural and tribal cultural resources would be reduced to less than significant.		

### 3.6 Energy

<i>Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</i>	<p><b>Less than Significant Impact.</b> The proposed project is intended to provide educational services needed for existing and future students in the neighboring area. The proposed project is adjacent to agricultural land to the north and a fully developed residential development to the west, housing development and an elementary school to the east, and housing and commercial developments to the south. The proposed project is designed to comply with California requirements for energy conservation standards codified in CCR Title 24, Part 6.</p> <p><b>Short-Term Energy Use</b></p> <p>The construction phase is temporary, and it ends once the proposed project is built and construction activities are completed. During the construction phase energy consumption will result primarily from fuel used to power off-road construction equipment, material delivery and removal trucks, and vehicles used by employees to travel to the job Site. Construction equipment and trucks would be subject to applicable regulations which include anti-idling measures and use of efficient engines. These measures would prevent the unnecessary use of energy and inefficient equipment. There are no identified aspects of the proposed project that would incur in unnecessary or inefficient use of energy. Thus, the construction of the proposed project is not anticipated to result in wasteful, inefficient or unnecessary use of energy.</p>	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p><b>Long-Term Energy Use</b></p> <p>The proposed project will require energy to conduct day to day operations. The proposed project is designed to include multiple energy saving features. Energy use by the proposed project was calculated using CalEEMod and would occur at a rate of 3.33 Giga British Thermal Units per year for natural gas use and 1.45 Giga Watt-hour per year for electricity use.</p> <p>Given the proximity of the proposed project to the surrounding housing developments, vehicle trips associated with drop off and pick up of students would likely be minimized as students walk to school. Thus, energy minimization associated with minimized and/or shorter vehicle trips is likely to result.</p> <p>No unnecessary consumption of energy resources is anticipated during operation of the proposed project.</p>		
<i>Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</i>	<b>Less than Significant Impact.</b> The proposed project design is consistent with the City of Oxnard Energy Action Plan which implements 2030 General Plan goals and strategies. Thus, the proposed project is not anticipated to obstruct a state or local plan for renewable energy or energy efficiency.	No mitigation is required.	Less than Significant Impact
<i>Cumulative Energy Impacts</i>	<b>Less than Significant Impact.</b> Energy use by the proposed project will contribute to energy use by existing and future users (e.g., housing and businesses). Significant cumulative impacts on energy use would result if operation of the proposed project and existing and future projects incur inefficient and wasteful uses of energy. As mentioned above, the efficient use and reduction of energy use is closely related to air and greenhouse	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	gas reductions. Thus, efforts to curtail air emissions and GHG in many ways contribute to the efficient use and reduction of energy consumption. The proposed project is designed to comply with California requirements for energy conservation standards codified in CCR Title 24, Part 6 and is not expected to have significant cumulative impacts resulting in wasteful and inefficient use of energy.		

### 3.7 Geology and Soils

<p><i>Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:</i></p> <p><i>i) Strong seismic ground shaking?</i></p>	<p><b>Potentially Significant Impact.</b> The <i>City of Oxnard General Plan Draft Background Report</i> (City of Oxnard 2006) indicates that even though the historic record indicates that no strong earthquakes or surface displacement have occurred along the faults in southern Ventura County in the Site area, the likelihood of the occurrence of one or more of such events within the next 50 to 100 years is not remote.</p> <p>The Site is in a region of generally high seismicity and has the potential to experience strong ground shaking from earthquakes on regional or local causative faults. The findings of the Geotechnical Report show that there is the potential for adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.</p> <p>The potential risks posed by the project from strong seismic ground shaking would be less than significant impacts with mitigation incorporated. Mitigation Measure GEO-1 requires that the building design for structures at the project use geotechnical building design recommendations that are based on a Site-specific ground motion hazard analysis for the project Site in accordance with ASCE 7-10 (ASCE 2013) Chapter 21 as modified by Section 1803A.6 of the 2016 California Building Code (CBC)</p>	<p><b>GEO-1:</b> The building design for structures at the project shall use geotechnical building design recommendations that are based on a Site-specific ground motion hazard analysis for the project Site performed in accordance with ASCE 7-10 (ASCE 2013) Chapter 21 as modified by Section 1803A.6 of the 2016 CBC (ICC 2017). The Site-specific ground motion hazard analysis and geotechnical building design recommendations shall be approved by the CGS and the DSA.</p>	<p>Less than Significant Impact</p>
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	(ICC 2017). The Site-specific ground motion hazard analysis and geotechnical building design recommendations shall be approved by the CGS and the DSA. With the implementation of Mitigation Measure GEO-1, the project would have a less than significant impact.		
<i>Would the project result in substantial soil erosion or the loss of topsoil?</i>	<p><b>Potentially Significant Impact during Construction.</b> Soil erosion would potentially occur during project construction activities, including Site grading, structure assembly, and utility extension. With the implementation of Mitigation Measure GEO-2, this impact would be reduced to a less than significant level with standard erosion mitigation measures, including the use of hay bales and other erosion control devices as determined by Site-specific conditions, limiting construction to the dry season, soil wetting, and adherence to applicable regulatory guidelines and standards. These measures would also reduce potential air quality impacts and sedimentation.</p> <p>Once the project is completed, no additional loss of topsoil or erosion would occur as there would be no exposed soils on the project Site and project impact would be less than significant.</p>	<p><b>GEO-2:</b> An erosion plan shall be developed for project construction activities that includes measures such as the use of hay bales and other erosion control devices as determined by Site-specific conditions, limiting construction to the dry season, and soil wetting, applied as required under applicable regulatory guidelines and standards.</p>	Less than Significant Impact
<i>Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i>	<p><b>Potentially Significant Impact during Construction.</b> In Ventura County, paleontological remains, typically identified in Pleistocene-age or older deposits, include examples from throughout most of the related geological history, including the Paleozoic (600-225 million years ago), Mesozoic (225-70 million years ago) and Cenozoic (70 million years ago-present) eras. Based on the geological map of Ventura County, Oxnard quadrangle, the project Site is underlain by Holocene age (10,000 years before present [BP] to recent) alluvial fan</p>	<p><b>GEO-3: Paleontological Resource Impact Mitigation Program.</b> Prior to any ground-disturbing activities, a Paleontological Resource Impact Mitigation Program (PRIMP) shall be prepared by a qualified paleontologist if project construction will exceed Holocene soils (estimated depth of Holocene soils is at least to 70 feet bgs). A qualified paleontologist shall also attend the</p>	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>deposits composed of soils that are deltaic alluvium and wash fan deposits to approximately 70 feet below ground surface (bgs). These are conformably underlain by upper Pleistocene alluvial sand and gravel deposits to approximately 400 feet bgs, and the marine – non-marine clays and gravels of the Lower Pleistocene San Pedro formation to approximately 2,000 feet bgs (ESP 2018a and 2018b; Gutierrez, et al. 2008; Turner and Mukae 1975). Holocene age deposits are considered to have a low sensitivity for yielding paleontological resources. In 2010, a paleontological record search of the museum collection records maintained by the Natural History Museum (NHM) of Los Angeles County was conducted for the Oxnard Airport Land Easement Acquisition Project, approximately 2.1 miles west of the project Site (SWCA Environmental Consultants 2009). The record search included a one-mile radius around the airport and indicated that no previously identified paleontological localities occurred within the search area, nor had any resources been reported within the same Holocene age geological unit as the current project APE (SWCA Environmental Consultants 2009). Based on the estimated depth of Holocene-age deposits (to at least 70 feet bgs), surficial ground disturbance is unlikely to encounter or cause a substantial adverse change in significance to a paleontological resource (Turner and Mukae 1975). Assuming that Holocene age deposits extend to approximately 70 feet bgs at the project site, it is highly unlikely that Pleistocene deposits will be encountered during construction. However, if project ground disturbing construction depths exceed the Holocene age deposits or encounters shallow Pleistocene deposits, paleontological resources may be exposed. Paleontological</p>	<p>worker environmental awareness program training and provide information on paleontological resources and a brochure/handout outlining procedures in the event of a paleontological find during construction. The District Project Manager will require the construction contractor to initiate implementation of the PRIMP at the beginning of ground disturbing activities. The PRIMP will address and define the following specific activities and responsibilities:</p> <ul style="list-style-type: none"> <li>• Full-time monitoring by a qualified paleontologist during all grading and excavation extending more than 10 feet (ft) bgs or beyond Holocene deposits.</li> <li>• Spot-check monitoring by a qualified paleontologist for all grading and excavation between 5 and 10 ft bgs to determine whether older sediments with a potential to contain paleontological resources are present.</li> <li>• Procedures for project personnel and/or paleontological monitor to halt work and temporarily redirect construction away from an area if paleontological resources are encountered during</li> </ul>	



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	resources in Ventura County include many widely dispersed outcrops of fossil bearing formations (Ventura 2011). With the implementation of Mitigation Measure GEO-3 (Paleontological Resource Impact Mitigation Program), the project would have a less than significant impact.	<p>grading or excavation in order to assess the significance of the find.</p> <ul style="list-style-type: none"> <li>• Procedures for recommendations regarding level of monitoring effort (e.g., spot check, full-time) depending upon sensitivity of soil depth, identification of finds, etc.</li> <li>• Procedures for handling collected material and curation.</li> <li>• Procedures for reporting and documenting the results of the monitoring program.</li> <li>• Provide brochure of environmental awareness training.</li> </ul>	
<i>Cumulative Geology and Soils Impacts</i>	<b>Less than Significant Impact.</b> The proposed project would result in a less than significant contribution to cumulative impacts on soils and geology. The proposed project and all new building projects within the surrounding study area (City and the County) would be required to comply with the applicable State and local requirements, including, but not limited to, the CBC, and would be required to implement recommendations of a Site-specific geotechnical report. Therefore, the project specific impacts, as well as the impacts associated with other projects, would be reduced to a less than significant level. Seismic impacts are a regional issue and are also addressed through compliance with applicable codes and design standards. For these reasons, the project's contribution to	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	cumulative geotechnical and soil impacts is less than significant.		
<b>3.8 Greenhouse Gas Emissions</b>			
<i>Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i>	<b>Less than Significant Impact.</b> The proposed project would generate GHGs during construction and operation activities. GHG emissions generated by the proposed project would not exceed the identified threshold and therefore project impacts are considered less than significant.	No mitigation is required.	Less than Significant Impact
<i>Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</i>	<b>Less than Significant Impact.</b> GHG emissions generated by the proposed project would not exceed the South Coast Air Quality Management District (SCAQMD) threshold of 10,000 metric tons of CO <sub>2</sub> -equivalents (MTCO <sub>2</sub> e). Neither construction nor operation of the proposed project is expected to conflict with any applicable plan, policy or regulation of any agency adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, project impacts are considered less than significant.	No mitigation is required.	Less than Significant Impact
<i>Cumulative Greenhouse Gas Emissions Impacts</i>	<b>Less than Significant Impact.</b> The proposed project would contribute GHGs which would add to GHG emitted locally and globally. However, the GHG emissions from the proposed project would not exceed the SCAQMD interim threshold of 10,000 metric tons (MT) per year of carbon dioxide equivalent (CO <sub>2</sub> e) and therefore cumulative project impacts are considered less than significant.	No mitigation is required.	Less than Significant Impact
<b>3.9 Hazards and Hazardous Materials</b>			
<i>Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to</i>	<b>No Impact.</b> Based on the results of the SSI risk characterization, the SSI Report recommended a No Further Action (NFA) determination by Department of Toxic Substances Control (DTSC) for the High School No. 8 Site. In a letter dated April	No mitigation is required.	No Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</i>	26, 2019, DTSC approved the SSI Report and concurred with the recommendation for an NFA determination for the project Site. Therefore, the project Site is not located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and no project impact would result.		
<i>Cumulative Hazards and Hazardous Materials Impacts</i>	<b>Less than Significant Impact.</b> The proposed project would result in a less than significant contribution to cumulative impacts on hazardous materials. The proposed project and all new building projects within the surrounding study area (City and the County) would be required to comply with the applicable State and local requirements, including, but not limited to, the DTSC, CDE, FAR, Caltrans DOA, Ventura County, and the City of Oxnard, and would be required to implement recommendations of the Site-specific PEA Report, SSI Report, and associated DTSC approval letters.	No mitigation is required.	Less than Significant Impact

### 3.10 Hydrology and Water Quality

<i>Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?</i>	<p><b>Potentially Significant Impact during Construction.</b></p> <p><b>Construction Storm Water</b></p> <p>Construction of the proposed project would disturb approximately 49.75 acres. During construction, pollutants of concern include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Additionally, excavated soil would be exposed, so there would be an increased potential for soil erosion compared to existing conditions. Lastly, chemicals, petroleum products (such as paints, solvents, and fuels), and concrete-related waste could spill or leak and have the potential to be transported via storm runoff into</p>	<b>HYDRO-1:</b> If perched groundwater is encountered during construction, the OUHSD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>downstream receiving waters (ultimately the Pacific Ocean). Since the project will disturb greater than one acre of land, the project must comply with the Construction General Permit (CGP). Pursuant to the CGP, the project a Site-specific Stormwater Pollution Prevention Plan (SWPPP) must be prepared that details construction best management practices (BMPs) for use during construction activities. Construction BMPs, as detailed in the project-specific SWPPP would include, but not be limited to, run-on and runoff controls, erosion and sediment controls designed to minimize erosion and retain sediment on-Site, and good housekeeping BMPs intended to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. The CGP requires weekly inspections, storm water monitoring, and reporting to ensure the BMPs are installed or implemented and effective. The proposed project includes a mix of landscaping and hardscape, which will prevent any increase risk of sediment discharge during the operation of the proposed project.</p> <p>Due to the depth to groundwater (20 to 25 feet bgs) on-Site, it is not anticipated that the groundwater table would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Groundwater may contain high levels of total dissolved solids and other constituents that could be introduced to surface waters. Any groundwater dewatering performed during excavation would be completed in accordance with the Los Angeles Regional Water Quality Control Board (RWQCB)'s Groundwater Discharge Permit. This permit requires testing and treatment (as necessary) of groundwater prior to its discharge off-Site. If perched groundwater is</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>encountered during construction, then under Mitigation Measure HYDRO-1, the OUSHD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein to ensure that the project would not violate any water quality standards or waste discharge requirements.</p> <p><b>Post-Construction Storm Water</b></p> <p>In order to terminate CGP coverage by filing a NOT with the State Water Board, the project must demonstrate that final stabilization has been reached (i.e., area disturbed by construction activities must be re-established to a uniform vegetative [or alternative permanent] cover equivalent to 70 percent coverage of the preconstruction vegetative conditions); all elements of the SWPPP must be complete; no greater potential for construction related pollutants to be discharged into the Site runoff than pre-construction; all construction materials, equipment, wastes, and temporary and plastic-containing BMPs must be removed from the Site; compliance with the Municipal Separate Storm Sewer System (MS4) Permit's post-construction standards (pursuant to the Technical Guidance Manual [TGM], County of Ventura 2015) must be demonstrated; and a post-construction control measure long-term maintenance plan must be established.</p> <p>At the time of developing this Draft EIR, the design of the proposed project's post-construction control measures consisted of:</p> <ul style="list-style-type: none"> <li>• Pre-treating runoff from the North and South Campus areas with a Downstream Defender (a circular manhole that is modified to separate sediment and heavy</li> </ul>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>debris to the bottom of tank, keeping floatable pollutants like trash or grease on the top of the surface within the chamber, and releasing treated stormwater);</p> <ul style="list-style-type: none"> <li>• Routing treated water from the Downstream Defender into an ADS Stormtech plastic chamber that will be installed under the basketball court area and into an infiltration system that will be installed under the varsity softball field;</li> <li>• Bypassing allowable discharges past the ADS Stormtech system, although larger flows will be diverted into the infiltration system to meet City of Oxnard detention requirements; and</li> <li>• Infiltrating and detaining runoff from the South Campus ADS Stormtech chamber under the parking lot.</li> </ul> <p>Around the perimeter of the Site, the streets installed will be dedicated to the City and, in some areas, runoff from the streets will be directed to the high school storm drain (SD) system. A few areas cannot connect to the underground infiltration/detention systems due to the grade and layout of the Site. At the time of developing this Draft EIR, the street runoff volume that needed to be accounted for into the Site's total retention/infiltration volume had not been determined. Jensen Design &amp; Survey, Inc. has proposed the incorporation of a treatment BMP, such as a grass swale or similar, but this had not been approved by the City of Oxnard at the time of developing this Draft EIR. However, at this time, it appears acceptable to mitigate the runoff volume from the areas that cannot be routed to the retention</p>		



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>features by upsizing the North and South detention systems to retain this additional volume of runoff. A Post-Construction Storm Water Management Plan (PCSMP), Design Criteria Checklist from Appendix G of the TGM, and Covenant for Maintenance of PCSMP that describes the post-construction features and calculations must be submitted to the City of Oxnard for review for all applicable new development projects. Additionally, the RWQCB will require verification of installation of the City-approved post-construction control measures and development of the long-term maintenance agreement as part of the NOT approval process. The post-construction features constructed and maintained in accordance with the TGM would comply with water quality standards and mitigate hydrologic impacts incurred by the new impervious surfaces.</p> <p><b>Wastewater</b></p> <p>The high school campus would generate domestic wastewater. The project would connect to the existing sanitary sewer main which conveys domestic wastewater to the Oxnard Wastewater Treatment Plant (OWTP). The OWTP, owned and operated by the City of Oxnard's Wastewater Division, is a secondary treatment facility located at 6001 South Perkins Road, Oxnard, California (City of Oxnard 2018b). The OWTP treats and discharges wastewater pursuant to <i>National Pollutant Discharge Elimination System Order No. R4-2013-0094</i>, adopted by the Los Angeles RWQCB on June 6, 2013. The proposed project would generate domestic wastewater from various sources, such as restrooms and food service facilities, and it would be treated by the OWTP.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	With compliance with existing regulations including implementation of stormwater BMPs that target pollutants of concern in runoff from the project Site, implementation of Mitigation Measure HYDRO-1, and connection to the OWTP, the potential for violation of water quality standards or waste discharge requirements and degradation of water quality would be less than significant.		
<i>Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</i>	<b>Potentially Significant Impact.</b> During construction, it is not anticipated that the groundwater table, which is 20 to 25 feet bgs, would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Any groundwater dewatering performed during excavation would be temporary, not result in a substantial volume removed, and completed in accordance with the Los Angeles RWQCB's Groundwater Discharge Permit. Grading and construction activities would compact soil, and construction of structures would increase impervious area, which can decrease infiltration during construction. However, construction activities would be temporary, and the reduction in infiltration would not be substantial relative to Semi-Perched Zone or the Upper Aquifer System (UAS) and Lower Aquifer System (LAS) that are the principal groundwater sources for the Oxnard Plain Groundwater Basin. The UAS and LAS are recharged through infiltration in the Oxnard Forebay area. Therefore, construction of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Construction impacts related to groundwater	<p><b>HYDRO-2:</b> The project shall meet its City of Oxnard Water Neutrality Policy requirements by completing at least one of the following:</p> <ul style="list-style-type: none"> <li>• Transfer of existing Fox Canyon Groundwater Management Agency (FCGMA) groundwater allocations to the City;</li> <li>• Contributing to increased efficiency by funding City water conservation programs;</li> <li>• Funding recycled water retrofit projects; or</li> <li>• Providing additional water supplies.</li> </ul>	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>supplies would be less than significant, and no mitigation is required.</p> <p>During the Maulhardt property's 2014 annexation by the City of Oxnard, 161 acre-feet per year (AFY) of groundwater were allocated to the City. The project's water will be supplied by the City of Oxnard and it will not pump groundwater directly from the underlying aquifer. The project Site's current agricultural uses are irrigated solely with well water (City of Oxnard 2012). The total annual water use for farming 100 acres of strawberries and other row crops is estimated at 250 AFY (City of Oxnard 2012); therefore, this volume of water that is currently drafted from the aquifer will not be drafted in the future and thus, would not impede groundwater management of the underlying aquifer. It is not known to what extent the agricultural crop irrigation contributed to groundwater recharge. However, a portion of the proposed project's wastewater will be treated at the publicly owned treatment works (POTW), treated at the Advanced Water Purification Facility (AWPF), and injected into the groundwater basin. Irrigation of landscaping and athletic fields will be supplied by the public water lines, with a separate connection to the main line, and will likely contribute to groundwater recharge. Therefore, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operation impacts related to groundwater supplies would be less than significant, and no mitigation is required.</p> <p><b>Potable Water Sources</b></p> <p>Water for proposed project will be supplied by the City of Oxnard on a looped system. There will be</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>four connections to the existing water mains. The approximate projected use for the high school is 67 AFY. On average, the daily flow rate is projected to be approximately 56,500 gallons per day.</p> <p>In addition to local groundwater, the City of Oxnard obtains groundwater from the United Water Conservation District (UWCD) and imported water from Calleguas Municipal Water District (CMWD), which are treated, blended, and supplied to consumers. The City also plans to expansively use recycled water for municipal uses, which will allow for additional supply for other uses. The City of Oxnard produces recycled water at the AWPf and delivers it via the Recycled Water Backbone System (MNS Engineers Inc. 2018). The City of Oxnard requires selected new development projects to design and construct dual piping systems within their project areas to facilitate the delivery of recycled water for non-potable uses, such as irrigation of landscaping and athletic fields.</p> <p><b>Neutrality</b></p> <p>The 100-acre Maulhardt Property was annexed into the City of Oxnard and the MWD in 2014. Per Jensen's <i>Projected Water Demands Letter</i> to Tetra Tech (2019), although the City of Oxnard's <i>Urban Water Master Plan</i> includes the Maulhardt Property and the Site was allocated 161 acre-feet (AF) of groundwater within the annexation, it does not specify specific projected water usage for the Site and therefore, Jensen Design &amp; Survey, Inc. cannot determine at this time whether the supply is sufficient to meet the estimated demand of 67 AFY (2019). However, if it is assumed that the calculation for water demand for the high school is correct (2.3 AFY/acre [estimated from the <i>Teal Club Specific Plan EIR</i>, City of Oxnard 2015, per the</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Jensen Survey &amp; Design, Inc. memorandum]), which would result in 114.43 AFY as the total demand for the high school, and 161 AFY is the allotted supply, the proposed project's water demand will not exceed the estimated supply.</p> <p>The East Village Draft EIR states that the East Village community could demand up to 324 AFY and when the current estimated agricultural extraction is subtracted, it would be an additional 163 AFY of demand from the exiting use to the future use (City of Oxnard 2012). This additional volume has been accounted for in the overall planned water demand increase for Oxnard and water supplies identified in the <i>East Village Draft Environmental Impact Report</i> (Eco Tierra Consulting 2012). The City of Oxnard developed a credit bank for use during extended drought or water supply restricted conditions and will gradually restore its groundwater credit bank as a buffer against future supply constraints with the GREAT Program (City of Oxnard 2012). It is anticipated that reasonably-projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection are sufficient to meet the water demand associated with the project, in addition to the City's existing and planned future uses (City of Oxnard 2012). Furthermore, the City of Oxnard imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City of Oxnard Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The requirements of</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	the City of Oxnard Water Neutrality Policy are included in the proposed project's water allocation analysis (Jensen Design and Survey, Inc. 2019b). The City is requiring the project to present a plan for water neutrality. Thus, with the implementation of Mitigation Measure HYDRO-2, the proposed project's impacts on groundwater supply would be less than significant.		
<p><i>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 or through the addition of impervious surfaces, in a manner which would:</i></p> <p><i>i.) result in substantial erosion or siltation on- or off-Site;</i></p>	<p><b>Less than Significant Impact.</b> During construction activities, the project Site would be graded and excavated, exposing soil and increasing the potential for soil erosion compared to existing conditions. During a storm event, soil erosion and sedimentation could occur at an accelerated rate. For example, excavation activities result in soil stockpiles, which has the potential to be washed into storm drains, blown off-Site by wind, or tracked off-Site by heavy equipment. In addition, construction activities would compact soil, and construction of structures would increase the impervious area, which can increase runoff during construction. Since the project will disturb greater than one acre of land, the project must comply with the CGP. Pursuant to the CGP, a Site-specific SWPPP must be prepared that details construction BMPs for use during construction activities. Construction BMPs would include, but would not be limited to, erosion and sediment controls designed to minimize substantial erosion or siltation. Prior to terminating coverage under the CGP, the project Site must be stabilized and not pose any additional sediment discharge risk than it did prior to the commencement of construction activity. The proposed project includes a mix of landscaping and hardscape that will minimize erosion. Implementation of the Site-specific SWPPP during construction activities would reduce the potential for</p>	No mitigation is required.	Less than Significant Impact



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	altering drainage patterns or causing flooding to less than significant levels during construction. Additionally, much of the runoff from the Site will be retained and/or treated within post-construction control measures. Therefore, the proposed project will not result in substantial erosion or siltation on- or off-Site.		
<i>ii.) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</i>	<b>Less than Significant Impact.</b> There are no on-Site streams or rivers; therefore, the project would not alter the course of a stream or river. Although the existing drainage pattern of the Site would be substantially altered, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion, sedimentation, or flooding on- or off-Site with compliance with existing regulations and the MS4 Permit's post-construction standards. Operational impacts related to on- or off-Site erosion, siltation, and flooding would be less than significant and no mitigation is required.	No mitigation is required.	Less than Significant Impact
<i>iii.) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</i>	<b>Less than Significant Impact.</b> Currently, storm water discharges through agricultural ditches and ultimately flows to Rice Road Drain. The proposed project will route storm water from pervious and impervious surfaces via storm drain inlets, curbing, and piping and will continue to discharge to the Rice Road Drain construction. The City of Oxnard will hold the Maulhardt Property (and therefore, the proposed project) to the 1 cfs/ac runoff discharge rate, consistent with the 1987 Rice Road Watershed Agreement referenced in Jensen Design & Survey, Inc.'s <i>Hydrology Letter</i> (Jensen Design and Survey, Inc. 2019a). The remaining runoff is designed to be retained on-Site. The 1 cfs/ac flow rate was deemed and acceptable flow rate to prevent downstream flooding of the receiving water (Rice	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Road Drain) and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems.</p> <p>The proposed project would change on-Site drainage patterns by adding impervious surface areas, including buildings and parking lots, and constructing drainage structures. The proposed project would result in at least 32 acres of increased, permanent impervious surface area. An increase in impervious area would increase the volume of runoff during a storm, which would more effectively transport pollutants to receiving waters. The proposed features include pre-treatment of runoff from the North and South Campuses with <i>Downstream Defender</i> hydrodynamic separators. The treated water would then flow into ADS Stormtech plastic chambers that will be installed under the basketball court area (North Campus) and the parking lot (South Campus). The North Campus will also have an infiltration system under the varsity softball field. Allowable discharges will bypass the ADS Stormtech system, but larger flows will be diverted into the infiltration system to meet City of Oxnard detention requirements. A portion of the runoff from the streets that will be constructed and dedicated to the City of Oxnard and surrounding the Site will be mitigated by upsizing the North and South Campus detention systems to retain this additional volume of runoff. Through a combination of these stormwater control measures, both on-Site and off-Site flooding will be controlled. Operational impacts related to capacity of stormwater drainage systems would be less than significant and no mitigation is required.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>iv.) impede or redirect flood flows?</i>	<p><b>Less than Significant Impact.</b> Although the project's new impervious surfaces would change the hydrology of the Site and off-Site runoff, post-construction features are specifically designed to prevent alteration of downstream watercourses and restrict flood potential. Additionally, the Site's stormwater conveyance features will be sized to the allowable flow rate for the Rice Road Drain (i.e., one cfs/ac), which is designed to prevent downstream flooding. Therefore, both on-Site and off-Site flooding will be controlled.</p> <p>Because the project area is outside the 100-year flood zone, it is not within a flood hazard area. Additionally, the project would not involve placing structures that would impede or redirect flood flows within a 100-year flood hazard area. Therefore, the proposed project would not place within a 100-year flood hazard area structures that would impede or redirect flow and project impact would be less than significant.</p>	No mitigation is required.	Less than Significant Impact
<i>In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?</i>	<p><b>Potentially Significant Impact.</b></p> <p><b>Flood Hazard</b></p> <p>According to <i>Ventura County General Plan Hazards Appendix</i>, Figure 2.10, <i>1% Annual Chance Floodplain</i>, the project is located outside of the 1% annual change floodplain (also referred to as the 100-year floodplain), which are established by the FEMA (County of Ventura 2013).</p> <p>As shown in the FEMA FIRM for Ventura County Incorporated Areas, the west half of the project Site is located within a Zone X, <i>Area of Minimal Flood Hazard</i> and the east half of the project Site is</p>	<b>HYDRO-3:</b> The OUHSD shall develop and implement a Site evacuation plan to be implemented in conjunction with the County of Ventura OES Dam Failure Response Plan.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>located in Zone X, <i>0.2 Percent Annual Chance of Flood Hazard</i><sup>1</sup> (FEMA 2010).</p> <p>However, recommendations by the Grand Jury investigation that was initiated after the 2017 failure of the spillway at Oroville Dam consisted of directing the Office of Emergency Services (OES) to provide dam safety public education; assist residents in planning for dam failures; work more closely with DSOD to monitor and evaluate safety for dams in or affecting Ventura County; track the progress of remedial action taken at Matilija Dam, Santa Felicia Dam, Castaic Dam, and Bouquet Canyon Dam; and reporting progress annually (Ventura County Grand Jury 2018). Local inspections are now conducted at all dams owned by the Ventura County Watershed Protection District before winter and during and after each storm. As of March 2017, the Santa Clara River Levee in Oxnard was in the process of rehabilitation construction and undergoing design/engineering/CEQA work (City of Oxnard 2017b).</p> <p>With continued inspections of the dams, rehabilitation of the dams as needed, and the implementation of the Grand Jury recommendations, risk of an incident similar to the Oroville Dam spillway failure would be mitigated. Additionally, compliance with Mitigation Measure HYDRO-3, which requires OUHSD to develop and implement a Site-specific flooding evacuation plan to be implemented in conjunction with the OES <i>Dam</i></p>		

<sup>1</sup> Defined as, "Areas of 0.2% annual chance flood, areas of 1% annual chance flood with average depths of less than one foot or with drainage areas less than one square mile."

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p><i>Failure Response Plan</i>, project impacts would be less than significant.</p> <p><b><i>Tsunami and Seiche Hazard</i></b></p> <p>According to the <i>Tsunami Inundation Map for Emergency Planning Oxnard Quadrangle</i> prepared by the California Emergency Management Agency, California Geological Society, and the University of Southern California (CalEMA et al. 2009), the project location is well outside of any tsunami inundation areas.</p> <p>No lakes, rivers, or other inland waters that could cause a seiche are located near the project. The County of Ventura has not identified “seiche zones” and the <i>Ventura County General Plan, Hazards Appendix</i> states that there is no historic record of a seiche occurring in Ventura County, although County residents experienced small seiches caused by swimming pools during the 1994 Northridge earthquake (County of Ventura 2013).</p> <p>Therefore, tsunamis and seiches are not considered to be potential hazards to the Site and there is no impact.</p>		
<p><i>Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</i></p>	<p><b>Less than Significant Impact.</b> The Oxnard Plain Basin is the primary source of groundwater supplying Oxnard’s service area. The FCGMA allocates and limits groundwater extraction volumes to address overdraft and to bring the basins to “safe yield” (when groundwater extraction from a basin are approximately equal to annual replenishments of water into the groundwater basin; the safe yield estimate for the FCGMA area is approximately 120,000 AFY), mostly to halt groundwater intrusion (MNS Engineers, Inc. 2018).</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>The completion of the Sustainable Groundwater Management Plan (SGMP), currently being developed by the FCGMA, will address the long-term sustainability of the basin for municipal and agricultural pumpers. The SGMP will contain historical data, groundwater levels, groundwater quality, subsidence, groundwater-surface water interaction, historical and projected demands and supplies, recharge areas, measurable objectives, interim five-year milestones, a sustainability goal, and a plan to achieve the goal in 20 years, with a 50-year planning and implementation horizon. The draft plan was released in November of 2017 and additional modeling was conducted from 2017-2018. The FCGMA has not provided a date of completion for the SGMP. The Maulhardt Property's groundwater allocations were transferred to the City of Oxnard and the project area was incorporated into the SGMP. In addition, project impacts related to groundwater supplies would be less than significant. Therefore, the project is not expected to conflict with the SGMP and project impacts to the sustainable groundwater management plan will be less than significant.</p>		
<i>Cumulative Hydrology and Water Quality Impacts</i>	<p><b>Less than Significant Impact.</b> The project's contribution to cumulative impacts to hydrology and surface water quality would be less than significant. The cumulative impacts of the proposed project on hydrology and water quality are:</p> <p><b>Surface Water.</b> The project would create an alteration of the City's storm water drainage features associated with the project Site and increase in total impervious surface. This would increase total runoff volume and peak flow to Rice Road Drain. This will be mitigated by the project's proposed post-construction features, which are</p>	No mitigation is required.	Less than Significant Impact



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>required by the Construction General Permit and the City's MS4 Permit, will follow the Technical Guidance Manual (County of Ventura 2011, updated 2015 and 2018), will be defined in the PCSMP, and vetted by the City of Oxnard. At the time of developing this Draft EIR, the precise routing of the storm water drainage features and discharge location to Rice Road Drain had not been finalized. However, the design to the storm water drainage features will be required to comply with the 1 cfs/ac flow rate to prevent downstream flooding of the receiving water (Rice Road Drain) and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems. Therefore, the project's contribution to cumulative storm water drainage impacts would be less than significant.</p> <p><b>Groundwater.</b> The project is not anticipated to impact groundwater quality. Impacts to groundwater quantity may be lower upon completion of the project in comparison to the volumes pumped directly from the groundwater basin to irrigate the agricultural fields. The City and the UWCD pump groundwater from the basin, but supplied water is also sourced from the State Water Project and recycled water from the Backbone system. Additionally, the City received the 161 AFY groundwater allocation as part of the annexation. Given the project's plan for water neutrality, as required by the City, the increase of demand in City water supply will be mitigated. Therefore, the project's contribution to groundwater impacts would be less than significant.</p> <p><b>Flooding.</b> The project Site is located outside of the 100-year and 500-year floodplain, is not within a levee or flood risk area, and it not in a seiche,</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	tsunami, or mudflow risk area. The project will discharge no more than the City-required 1 cfs/ac to Rice Road Drain to avoid flooding impacts downstream (Jensen Survey & Design, Inc. 2019). Given the installation of post-construction features described above, the project would not impact increase overall flood potential in the City. Therefore, the projects contribution to cumulative flooding impacts would be less than significant.		

### 3.11 Land Use and Planning

<i>Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</i>	<p><b>Less than Significant Impact.</b> The project Site is zoned R1-PD, C2-PD, and C-R consistent with the NECSP land use designations. A school is not consistent with current NECSP land use designations for the project Site. Under the terms of the CCA with the District and associated Maulhardt Agreement, a higher amount of park acreage would be provided than the City would otherwise be able to require under the existing densities allowed by the Specific Plan (City of Oxnard 2019b). Approval of the subject agreement with the Owners did not pre-commit the City to approving a future development permit for the remaining land within the Maulhardt Property. Furthermore, it does not pre-commit the City to any higher residential densities or uses other than what are currently allowed under the Specific Plan. Any future development for the residential and commercial areas would require environmental review and an amendment to the Specific Plan, including subsequent City Council approval (City of Oxnard 2019b).</p> <p>Notwithstanding a General Plan or Zoning Amendment, School Districts are not required to comply with the local building ordinances, except for</p>	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>city and or county ordinances for (1) regulating drainage improvements and conditions; (2) regulating road improvements and conditions; and (3) requiring the review and approval of grading plans, to the extent such ordinance provisions relate to the design and construction of on-Site improvements that affect drainage, road conditions and traffic flow.</p> <p>The District is coordinating with the City relative to conformance of its Site use with the existing General Plan and zoning ordinances pursuant to Government Code Sections 65402 and Public Resources Code Section 21151.2. To the extent any such use is not in conformance, the District either will work with the City for any necessary General Plan and/or Zoning Amendments or consider State Law for overruling such requirements as to applicable school facilities construction per Government Code Section 53094. Therefore, with compliance with existing regulations, project land use impact would be less than significant.</p>		
<i>Cumulative Land Use and Planning Impacts</i>	<p><b>Less than Significant Impact.</b> Development of the project in conjunction with the related projects (including any potential future development of the remaining portions of the Maulhardt Property) would result in further “infilling” of various urban land uses in the City. Each related project would be subject to individual review for conformance to current land use regulations and compatibility with surrounding land uses. Additionally, each related project would be subject to independent environmental review. These procedures would provide assurances that potential cumulative impacts related to land use consistency and compatibility would generally be less than significant.</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>The City certified the 2030 General Plan Program EIR on October 11, 2011 that considered the possible environmental impacts of buildout to 2030: adding approximately 40,000 people to the City's population, development of all remaining vacant land within the Oxnard City Urban Growth Boundary (CURB) Line (including the project Site). The project Site was also identified as a potential school location on the City of Oxnard General Plan Figure 4-2. The 2030 General Plan Program EIR finds that Class I significant and unavoidable impacts are: 1) Air Quality (Basin Attainment); 2) Greenhouse Gases Emissions; 3) Agricultural Resources; 4) Circulation, Traffic and Transportation (five intersections operate below Level of Service 'C'); and 5) Noise and Ground Vibration. All other cumulative environmental impacts are found to be less than significant with implementation of mitigating policies and programs. The 2030 General Plan Program EIR is hereby incorporated for the cumulative analysis of land use impacts.</p>		
<b>3.12 Noise</b>			
<p><i>Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies?</i></p>	<p><b>Potentially Significant Impact during Construction.</b> The City of Oxnard General Plan Noise Element identifies land use compatibility standard for noise-sensitive land uses as a community noise equivalent level (CNEL) of 55 A-weighted decibels (dBA) to 70 dBA as conditionally acceptable. Ambient levels of 52 dBA to 61 dBA were observed at the project Site during field monitoring. The dominant noise sources in the vicinity of the proposed project Site is traffic noise associated with Camino Del Sol and Rose Ave. Based on existing traffic volumes, noise impacts to adjacent residences range from 54 dBA CNEL to 68 dBA CNEL. The project would result in an increase</p>	<p><b>N-1:</b> Construction noise levels fluctuate depending on the construction phase, equipment types and duration of use; distance between noise source and sensitive receptor; and the presence or absence of barriers between noise source and receptors. Therefore, the project proponent should require construction contractors to limit standard construction activities as follows:</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>in traffic along Camino Del Sol and Rose Ave during the arrival and departure of students. The project traffic analysis identifies an increase of 1,827 Average Daily Trips (ADT) at Rose Ave, and 3,016 ADT at Camino Del Sol. This increase in ADT represents an increase of less than 1 dBA at the residences adjacent to the proposed project. According to CEQA guidelines, an increase in the overall ambient community noise level of less than 1 dBA is considered to be a less than significant impact. The construction of the proposed school Site would have only a minimal impact on daily traffic volumes in the project vicinity, and thus would have minimal impact on traffic noise conditions.</p> <p>Construction of the proposed high school is planned to start in early 2020. All project construction activities are anticipated to be completed within 25 months. Typical construction equipment would not be expected to generate noise levels above 90 dBA at 50 feet, and most equipment types would typically generate noise levels of less than 85 dBA at 50 feet. The highest noise levels during construction are normally generated during Site grading and foundation work. Grading equipment would be the loudest equipment used at the Site. This equipment is expected to generate a maximum instantaneous noise level (<math>L_{max}</math>) of up to 75–80 dBA at the homes located at a distance of 100 feet to the south of the project. This would be loud enough to temporarily interfere with speech communication outdoors and indoors with the windows open.</p> <p>Worst-case construction levels would generate a maximum instantaneous noise level (<math>L_{max}</math>) of 65 dBA at the Rio Rosales Elementary School. This is not loud enough to interfere with speech communication outdoors or indoors. Project</p>	<ul style="list-style-type: none"> <li>Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible. In addition, the time allowed for equipment and trucks to idle will be limited to the extent practicable.</li> <li>Stationary noise sources shall be located as far from adjacent receptors as possible and shall be muffled and enclosed within temporary sheds, incorporate insulation barriers or other measures to the extent feasible.</li> <li>Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels</li> </ul>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>construction would occur between the hours of 7:00 a.m. and 3:30 p.m., Monday through Friday. Project construction will also implement standard noise reduction measures. Due to the infrequent nature of loud construction activities at the Site, the limited hours of construction, and the implementation mitigation measure N-1, the temporary increase in noise due to construction is considered to be a less than significant impact.</p> <p>The project Site is located within the Oxnard Airport sphere of influence (SOI). The airport runway midfield point is located approximately 2.7 miles west of the project Site. Oxnard Airport is an active general aviation/small scheduled service airport with approximately 169 based aircraft and approximately 74,157 operations for calendar year 2016 (VCTC 2017). The Oxnard Airport Noise Contour map within the City of Oxnard Noise Element to the General Plan shows that the project Site is located just outside of the 60 dBA CNEL contour. Therefore, the noise impact levels from the Oxnard Airport to the project Site will be below 60 dBA CNEL and with typical educational facility construction with windows closed, interior noise levels from aircraft operations are expected to achieve 45 dBA CNEL or less, which achieves both the State and City interior noise requirements. Therefore, noise impacts from the Oxnard Airport are considered to be less than significant.</p> <p>The City of Oxnard's Code of Ordinances Chapter 7 Section 7-185 limits noise propagation to residential land uses from stationary equipment during the daytime period (7:00 a.m. to 10:00 p.m.) to 55 dBA <math>L_{eq}</math> and during the nighttime period (10:00 p.m. to 7:00 a.m.) to 50 dBA <math>L_{eq}</math>. The proposed project will</p>	<p>from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible. This could achieve a reduction of 5 dBA. Quieter procedures shall be used such as drilling rather than impact equipment whenever feasible.</p> <ul style="list-style-type: none"> <li>• Heavy construction equipment operations should be limited during the school period when classrooms are being utilized in the adjacent building.</li> <li>• When heavy construction activities are located within 75 feet of a residential structure deploy a temporary portable sound barrier between the construction activities and nearest sensitive receptor.</li> </ul>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>include twenty-three new buildings, which include an approximate total of 155 rooftop HVAC units. The classrooms would be designed and constructed to have a Community Noise Equivalent Level of 45 dB or less. Given the elevated rooftop height for the mechanical equipment and assuming the rooftop mechanical equipment operates simultaneously, the noise levels from the operation of all the rooftop mechanical equipment would range from 45 dBA <math>L_{eq}</math> at the residential homes located to the south Camino Del Sol, 50 dBA <math>L_{eq}</math> at the residential homes located directly east of the project, 40 dBA <math>L_{eq}</math> at Rio Rosales Elementary School, 39 dBA <math>L_{eq}</math> at the residential homes across Rose Ave to the west, and 37 dBA <math>L_{eq}</math> at the residential homes across Cesar Chavez Dr to the North. The noise impacts from the rooftop mechanical equipment are less than the measured current ambient noise levels at the project Site and will result in a 2 dBA or less increase to the existing ambient noise levels. The noise levels generated by the proposed project will comply with the City of Oxnard's General Plan and Code of Ordinances. Therefore, project impact is less than significant.</p>		
<p><i>Would the project result in generation of excessive groundborne vibration or groundborne noise levels?</i></p>	<p><b>Less than Significant Impact.</b> Operation of the school would not generate vibration; however, construction of the classroom buildings and Site grading as well as infrastructure improvements and utility connections would require the use of equipment that could generate vibration. Possible sources of vibration may include bulldozers, dump trucks, backhoes, rollers, and other construction equipment that produces vibration. No blasting will be required at the project Site.</p> <p>Project construction activities would occur within approximately 50 feet from the nearest single-family</p>	No mitigation is required.	Less than Significant Impact



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	residence. According to the Federal Transit Administration (FTA) guidelines, a vibration level of 78 vibration velocity level (VdB) is the threshold of perceptibility for humans. For a significant impact to occur, vibration levels must exceed 80 VdB during infrequent events (Federal Transit Administration 2006). Based on the levels published by the FTA (Federal Transit Administration 2006) and the type of equipment proposed for use at the proposed project, coupled with the distance to the existing identified noise sensitive receptors, analysis shows that the vibration levels maybe perceptible at the nearest sensitive receptors, but will be below the maximum vibration level of 80 VdB. This vibration level is considered acceptable for impacts to sensitive receptors. Therefore, project impact is less than significant impact.		
<i>Cumulative Noise Impacts</i>	<b>Less than Significant Impact.</b> Cumulative projects include the effects of existing, current and reasonability foreseeable future projects. As noted above, the proposed project is shown to not significantly increase the overall ambient community noise level and would not expose persons to or generate excessive groundborne vibration or groundborne noise. Therefore, project cumulative impact would be less than significant.	No mitigation is required.	Less than Significant Impact
<b>3.13 Public Services</b>			
<i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or</i>	<b>Less than Significant Impact.</b> The project Site is located within the City of Oxnard and fire protection services would be provided by the Oxnard Fire Department. The proposed project would be designed and constructed to meet required fire standards that would include adequate emergency vehicle access. Construction would comply with the Occupational Safety and Health Administration	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<p><i>physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:</i></p> <p><i>i.) Fire Protection?</i></p>	<p>(OSHA) and Fire and Building Codes. The Oxnard Fire Department has been consulted regarding Site design, access, and fire hydrants.</p> <p>Operation of the school facility is anticipated to generate a typical range of service calls including fire suppression, emergency medical, and emergency rescue requests for service. Fire Station 5 located at 1450 Colonia Road is within 0.3 mile of the project Site. This station is close enough to provide fire protection services within a reasonable response time in accordance with local goals and policies. Chief Darwin Base of the Oxnard Fire Department has provided an estimate that the response time from Fire Station 5 to the corner of Camino Del Sol and North Rose Avenue would be less than 5 minutes (Oxnard Fire Department 2019). Therefore, with compliance with existing regulations, project impact on fire protection services would be less than significant.</p>		
<p><i>ii.) Police Protection?</i></p>	<p><b>Less than Significant Impact.</b> The District and its program manager shall direct the contractor to properly fence the Site during construction of the school facilities. The fence will help to reduce the potential for materials and equipment to be targets of theft that could result in a need for increased police services during construction.</p> <p>During operation, the school facilities would be within the service boundary of the Oxnard Police Department. The school facilities are proposed to accommodate both existing and anticipated future enrollment. Public funds, such as property taxes, would be used to cover the incremental costs associated with providing police services for future enrollment at the facilities. The project would not require the expansion of existing police facilities or the construction of new facilities. As a result, the</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	proposed project would result in a less than significant impact related to police protection during construction and long-term operation.		
iii.) Parks?	<p><b>Less than Significant Impact.</b> Demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. No housing is proposed as a part of the project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all of the additional staff could be hired from the existing qualified applicant pool already residing within or near the District. However, if teachers or other staff are hired outside the District area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the local population. The proposed project is needed to accommodate existing and anticipated future enrollment in OUHSD, and includes educational facilities designed to meet the educational and recreational needs of grades 9-12 students' onsite. Recreational facilities to be provided on campus include a stadium, a variety of play fields, hard courts, and a pool. In addition, the Civic Center Act would allow approximately 20.3 acres of school sports facilities, recreational areas, and parking for scheduled community use. The community facilities that will be available to the public through the Civic Center Act will likely lessen the physical impacts/demand on nearby park and recreational facilities as opposed to increase the demand. New park facilities will not be needed; therefore, project impact would be less than significant.</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>Cumulative Public Services Impacts</i>	<p><b>Less than Significant Impact.</b></p> <p><b>Fire and Police Protection</b></p> <p>The proposed project would cause an incremental increase in demand for fire and police protection services. Consistent with General Plan Policy ICS-1.3, as development in the City occurs, growth development fees would be required for allocation by the City of Oxnard to ensure adequate levels of service (City of Oxnard 2011a).</p> <p><b>Parks</b></p> <p>The proposed project is a comprehensive high school that would provide adequate recreational facilities on Site to meet students' educational needs. Increased demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. City of Oxnard Municipal Code Chapter 13 Article IV includes a park acquisition and development tax for each new dwelling unit. The revenue collected from this tax goes into the park acquisition and development fund. No housing is proposed as a part of the project, and a minimal increase in the local population is expected. Additionally, recreational facilities proposed for community use through the CCA would have a positive cumulative effect on park facilities. Therefore, project contribution to cumulative impacts would be less than significant.</p>	No mitigation is required.	Less than Significant Impact

### 3.14 Recreation

<i>Would the project include recreational facilities or require the construction or expansion of recreational</i>	<p><b>Less than Significant Impact.</b> Demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the</p>	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<p><i>facilities that might have an adverse physical effect on the environment?</i></p>	<p>generation of new jobs. No housing is proposed as a part of the project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all of the additional staff could be hired from the existing qualified applicant pool already residing within or near the District. However, if teachers or other staff are hired outside the District area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the local population.</p> <p>Every public school facility is considered a civic center where citizens, school-community councils, and clubs as well as senior, recreation, education, political, artistic, and other organizations may meet. The school district may grant the use of school facilities and grounds upon certain terms and conditions deemed proper by the governing board and subject to specified limitations, requirements, and restrictions set forth within the law (California Department of Education 2019). To meet this objective, a CCA is in place with the City to provide additional recreation opportunities to the community as well as civic center use of other school facilities on Site, outside of school hours. Facilities proposed for community use under the CCA include practice fields, JV baseball and softball fields, pool, outdoor basketball courts, tennis courts, performing arts center, and parking.</p> <p>The approximately 20.3 acres of community facilities that will be available to the public through the CCA will likely lessen the physical impacts/demand on nearby park and recreational facilities as opposed to increase the demand. This would help the City in meeting its standard for</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	acreage of parks per 1,000 residents. This would be a beneficial impact. New park facilities will not be needed; therefore, project impacts would be less than significant, and no mitigation would be required.		
<i>Cumulative Recreation Impacts</i>	<b>Less than Significant Impact.</b> The project Site is within the City of Oxnard; therefore, the City is the area of influence for cumulative analysis of park and recreational facilities. No housing is proposed as a part of the project, and a minimal increase in the local population is expected. As such, the proposed project would not conflict with General Plan Policy ICS-23.1. Additionally, the recreational facilities proposed for public use through the CCA would have a positive cumulative effect on park and recreational facilities in the City.	No mitigation is required.	Less than Significant Impact
<b>3.15 Transportation</b>			
<i>Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</i>	<p><b>Less than Significant Impact.</b></p> <p><b>Vehicle Miles Traveled (VMT)</b></p> <p>State Senate Bill 743 (2013), which was codified in Public Resources Code section 21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (<i>Id.</i>, subd. (b)(1); see generally, adopted CEQA Guidelines, §15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, Office of Planning and Research (OPR) has proposed, and</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>the California Natural Resources Agency (Agency) has certified and adopted, changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts.</p> <p>A project would have a significant effect on the environment if it would cause substantial additional VMT. The OPR <i>Technical Advisory on Evaluating Transportation Impacts in CEQA</i> (OPR 2018) recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets screening criteria, then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required.</p> <p>Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends quantified thresholds for these land uses for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In general, the recommended "Threshold of Significance" is if a proposed project exceeds a level of 15 percent below existing regional VMT for that type of project, a significant transportation impact may be generated. However, for other uses (i.e. retail projects), a net increase in total VMT may indicate a significant transportation impact.</p> <p><b>VMT Analysis</b></p> <p>The Ventura County Transportation Commission (VCTC) is in the process of updating the County-wide traffic model (VCTM) so regional household and non-household VMT levels can be determined. The City of Oxnard has not yet started this process.</p>		



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>At this time, no VMT data for residential, office, retail or other land uses is available, and no threshold of significance can be applied to school related VMT.</p> <p>While the proposed high school Site is expected to add traffic within the study-area, the new high school will also capture school related trips within the study-area (tour-based VMT), resulting in an overall reduction of school related trip lengths for parents and students. Therefore, potential impacts would be less than significant.</p> <p><b>Induced Automobile Travel Analysis</b></p> <p>A project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network. OPR's proposed transportation impact guidelines includes a list of transportation project types that would not likely lead to a substantial or measurable increase in VMT. If a project fits within the general types of projects (including combinations of types), then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required.</p> <p>The proposed project is not a transportation project. While the project would improve or reconstruct existing facilities, no new capacity or network changes are anticipated, and impacts would be less than significant.</p>		
<i>Would the project substantially increase hazards due to a geometric design feature</i>	<b>Less than Significant Impact.</b> The proposed project would be designed and constructed to meet required standards. Sight distance at the project accesses would comply with standard Caltrans and	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>(e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</i>	City of Oxnard sight distance standards. The final grading, landscaping, and street improvement plans would demonstrate that sight distance standards are met. Such plans would be reviewed by the City and approved as consistent with this measure prior to issuance of the grading permits. No slope or object over 30 inches would be in the line of sight area. Per the TCS (Appendix K), there would be no increase in hazards due to a design feature or incompatible uses. Therefore, with compliance with existing regulations, project impact would be less than significant, and no mitigation is required.		
<i>Would the project result in inadequate emergency access?</i>	<b>Less than Significant Impact.</b> The proposed project would not restrict or reduce emergency access to the project Site. The proposed project would be designed and constructed to meet required standards including adequate emergency access. All driveways would be designed according to City standards to facilitate emergency vehicle access. As part of standard development procedures, Site plans would be submitted for review and approval to ensure adequate emergency access prior to construction. Therefore, with compliance with existing requirements, project impact would be less than significant, and no mitigation is required.	No mitigation is required.	Less than Significant Impact
<i>Cumulative Transportation Impacts</i>	<b>Potentially Significant Impact.</b> Cumulative traffic volumes were developed using a list of approved and pending development projects in the City of Oxnard provided by City staff (City of Oxnard 2019g). In addition, traffic generated by the adjacent residential/commercial development (Urban Village) is included. Trip generation estimates were developed for the pending projects based on rates contained in the Institute of Transportation Engineers (ITE) <i>Trip Generation</i> for the respective	See Mitigation Measure TRAF-4 above.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>land uses. A trip generation worksheet is also included in the TCS (Technical Appendix). The cumulative projects traffic volumes were distributed onto the study-area street network based on each individual project's location, existing traffic patterns, and a general knowledge of the residential and commercial lay-out of the Oxnard area. The cumulative projects AM and PM peak turning volumes were assigned to the study area intersections and added to the existing peak hour volumes.</p> <p>Intersection LOS were recalculated assuming cumulative and cumulative plus project traffic conditions. the project would generate a cumulative impact based on City of Oxnard impact thresholds at the Camino Del Sol/Colonia Road intersection, which is forecast to operate in the LOS E range with cumulative plus project traffic. Mitigation Measure TRAF-4 has been added to reduce potentially significant cumulative traffic impacts to a less than significant level.</p> <p>The City of Oxnard Public Works Division collects traffic impact fees based on project generated traffic that would impact roadways within the City's jurisdiction. Standard conditions of permit issuance initiate collection of these fees for all projects within the City of Oxnard, regardless of whether the project is a private or a public project.</p>		

### 3.16 Utilities and Service Systems

<p><i>Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural</i></p>	<p><b>Potentially Significant Impact.</b> Jensen Design &amp; Survey, Inc. developed a <i>Preliminary Water Demand Memorandum</i> (2018) that calculated the water demand for the high school to be 2.3 AFY/acre (estimated from the <i>Teal Club Specific Plan EIR</i>, City of Oxnard 2015, per the Jensen Survey &amp; Design, Inc. memorandum), which would</p>	<p>See Mitigation Measure HYDRO-2 above.</p>	<p>Less than Significant Impact</p>
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<p>gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</p>	<p>result in 114.43 AFY. The memorandum states that demand estimated from the average water bills for Oxnard and Channel Island High Schools (including irrigation) was 67 AFY; the memorandum also states the rounded estimate from Hensley High School Architects, which was 56 AFY. The City of Oxnard 2030 Master Plan uses a demand of 1,500 gallons (0.0046 AF) per day per acre as the planning level consumption for school sites, based on the average water consumption of school sites located in the City of Oxnard and increased to account for future fluctuations, which extrapolates to 78 AFY.</p> <p>The proposed project's estimated water demand is approximately 67 AFY (Jensen Design and Survey, Inc. 2019b). The 100-acre Maulhardt Property was annexed into the City of Oxnard and the MWD in 2014. Per Jensen's <i>Projected Water Demands Letter</i> to Tetra Tech (2019), although the City of Oxnard's <i>Urban Water Master Plan</i> includes the Maulhardt Property and the Site was allocated 161 AFY of groundwater within the annexation, it does not specify specific projected water usage for the Site and therefore, Jensen Design &amp; Survey, Inc. cannot determine at this time whether the supply is sufficient to meet the estimated demand of 67.0 AFY (2019). However, if it is assumed that the calculation for water demand for the high school is correct (2.3 AFY/acre [estimated from the <i>Teal Club Specific Plan EIR</i>, City of Oxnard 2015, per the Jensen Survey &amp; Design, Inc. memorandum]), which would result in 114.43 AFY as the total demand for the high school, and 161 AFY is the allotted supply, the proposed project's water demand will not exceed the estimated supply. CMWD's 2015 Urban Water Management Plan (UWMP) states that the City of Oxnard accounted</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>for 12.8% of water deliveries; it is projected that sufficient water supplies will be available for the years 2020 through 2040 in normal years, single dry years, and multiple dry years to account for the proposed project, in addition to the City's existing planned future uses. These projections include the use of recycled water (Black and Veatch 2016). Furthermore, the City of Oxnard imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City of Oxnard Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The water fees associated with the proposed project would be paid upon issuance of a building permit (East Village EIR 2012). Thus, with the implementation of Mitigation Measure HYDRO-2, the proposed project's impacts on water supply and facilities would be less than significant.</p> <p>Allowable stormwater discharge rates for the Maulhardt Property stem from the 1987 Rice Road Watershed Agreement between the City of Oxnard and the VCWPD. At the time of developing this Draft EIR, the precise routing of the storm water drainage features, discharge location to Rice Road Drain, and size of on-Site detention basins had not been finalized; however, the proposed project will be held to the 1 cfs/ac discharge rate, consistent with the 1987 Rice Road Watershed Agreement (Jensen Design and Survey, Inc. 2019a). Proposed features include pre-treatment of runoff from the North and South Campuses with <i>Downstream Defender</i> hydrodynamic separators. The treated</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>water would then flow into ADS Stormtech plastic chambers that will be installed under the basketball court area (North Campus) and the parking lot (South Campus). The North Campus will also have an infiltration system under the varsity softball field. Allowable discharges will bypass the ADS Stormtech system, but larger flows will be diverted into the infiltration system to meet City of Oxnard detention requirements. A portion of the runoff from the streets that will be constructed and dedicated to the City of Oxnard and surrounding the Site will be mitigated by upsizing the North and South Campus detention systems to retain this additional volume of runoff. The proposed project area has been accounted for in the design and construction of the City RCB systems (Charles Hilsmann 1992; William J. Ghormley Consulting 1989; DH Civil Engineering, Inc. 1999). Through a combination of these stormwater control measures, project impacts on stormwater drainage facilities would be less than significant.</p> <p>The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient LED lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The Site parking lot and pathway pole-mounted lighting and sports field lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the project will be an energy-efficient type complying with the most recent energy</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	code. The high school will connect to an 8" Southern California Gas main line in Camino del Sol. The point of connection will be just west of the proposed driveway at Gibraltar Street. Natural gas uses will include water heaters, gas turrets in the Science building, kitchen equipment, pool boiler, and heating units. The project is planned to connect to existing utility lines and local telecommunication providers and is not anticipated to require the construction or relocation of electric power, natural gas, or telecommunication facilities. The proposed project area is an infill Site and will make any required upgrades to connect to existing utility lines and providers. The 2030 General Plan accounted for urban development of the Site, and utility providers within the City are included on the distribution list for the environmental documents pertaining to the proposed project (including the IS). Therefore, project impact would be less than significant.		
<i>Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</i>	<b>Potentially Significant Impact.</b> The proposed project's estimated water demand is approximately 67 AFY (Jensen Design and Survey, Inc. 2019b). The 100-acre Maulhardt Property was annexed into the City of Oxnard and the MWD in 2014. Per Jensen's <i>Projected Water Demands Letter</i> to Tetra Tech (2019), although the City of Oxnard's <i>Urban Water Master Plan</i> includes the Maulhardt Property and the Site was allocated 161 AFY of groundwater within the annexation, it does not specify specific projected water usage for the Site and therefore, Jensen Design & Survey, Inc. cannot determine at this time whether the supply is sufficient to meet the estimated demand of 67 AFY (2019). However, if it is assumed that the calculation for water demand for the high school is correct (2.3 AFY/acre [estimated from the <i>Teal Club Specific Plan EIR</i> , City of Oxnard 2015, per the Jensen Survey &	See Mitigation Measure HYDRO-2 above.	Less than Significant Impact



Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Design, Inc. memorandum]), which would result in 114.43 AFY as the total demand for the high school, and 161 AFY is the allotted supply, the proposed project's water demand will not exceed the estimated supply. CMWD's 2015 UWMP states that the City of Oxnard accounted for 12.8% of water deliveries; it is projected that sufficient water supplies will be available for the years 2020 through 2040 in normal years, single dry years, and multiple dry years to account for the proposed project, in addition to the City's existing planned future uses. These projections include the use of recycled water (Black and Veatch 2016). The MWD completed a reliability analysis for its 2015 UWMP. After projecting demands for single dry year, multiple dry years, and average years, the MWD's water reliability analysis indicates that the region can provide reliable water supplies under both the single driest year and the multiple dry-year hydrologies. From 2020 through 2040, demand can be met utilizing groundwater and SWP supplies. The key component of MWD's supply capability is the amount of water in its large regional storage portfolio that includes both dry-year and emergency storage capacity (MNS Engineers, Inc. 2018). Furthermore, the City of Oxnard imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City of Oxnard Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The water fees associated with the proposed project would be paid upon issuance of a building permit</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	(East Village EIR 2012). Thus, with the implementation of Mitigation Measure HYDRO-2, the proposed project's water demand will not exceed the estimated supply and impacts on water supply would be less than significant.		
<p><i>Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</i></p>	<p><b>Potentially Significant Impact.</b> The high school campus would generate domestic wastewater from various sources, such as restrooms and food service facilities, and it would be treated by the OWTP. It is anticipated the high school will produce an average sewage flow rate of 0.093 cubic feet per second (cfs), and a peak sewage flow rate of 0.2839 cfs (Jensen Design and Survey, Inc. 2019c). The OWTP has a current capacity of 31.7 million gallons per day (MGD) with average daily flows of approximately 24.0 MGD. The City anticipates expansion of the plant to 39.7 MGD by 2020.</p> <p>At the time of developing this Draft EIR, the precise downstream options for the high school sewer system had not been finalized, however, domestic wastewater generated at Oxnard High School No. 8 Site would discharge entirely to the Camino del Sol sewer. The anticipated sewer flow rates for the high school will be analyzed using the City's sewer model, which will determine the sewer design of the project and any necessary downstream upgrades (Jensen Design and Survey, Inc. 2019c) needed to provide adequate service to the project Site. Therefore, the potential project impacts on existing wastewater treatment facilities and sewer systems will be designed to meet City requirements. As part of standard development procedures, Site plans would be submitted for review and approval to ensure adequate wastewater capacity prior to construction. Therefore, with the implementation of</p>	<p><b>UTIL-1:</b> OUHSD shall submit the anticipated sewer flow rates for the high school to the City so that it can be analyzed using the City's sewer model. Based on the results, OUHSD shall coordinate with the City regarding the final sewer design including any required improvements needed to provide adequate sewer service to the project Site.</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	UTIL-1 and compliance with existing requirements, project impact would be less than significant.		
<i>Cumulative Utilities and Service Systems Impacts</i>	<p><b>Less than Significant Impact.</b> The General Plan and the NECSP consider probable future projects, each of which would have to undergo the CEQA process individually. The buildout of the remaining portions of the Maulhardt Property that do not encompass the proposed project area must consider the demand of the proposed project within the CEQA process. The City of Oxnard UWMP is based on 2030 General Plan buildout, and therefore addresses cumulative impacts in nature. Additionally, the proposed project and all future development projects in the City will be required to comply with standard water conservation requirements of the City, State, and California Building Code. These include the use of low-flush toilets and urinals, compliance with statewide efficiency standards for shower heads and faucets, and insulation of pipes to reduce water used before hot water reaches equipment or fixtures. Given the project's plan for water neutrality, as required by the City, the increase of demand in City water supply will be mitigated. Storm water drainage, electric power, natural gas, and telecommunications facilities are proposed to connect to already existing systems and service providers. The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient LED lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming,</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	daylight sensors and automatic occupancy sensing devices. The Site parking lot and pathway pole-mounted lighting and sports field lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the project will be an energy-efficient type complying with the most recent energy code. Cumulative impacts of the proposed project on Utilities and Service Systems will be less than significant.		

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## TABLE OF CONTENTS

<b>Executive Summary.....</b>	<b>1</b>
<b>1.0 Introduction.....</b>	<b>1-1</b>
1.1 EIR Type, Purpose, and Intended Use .....	1-1
1.2 Scope of EIR .....	1-1
1.3 EIR Organization.....	1-5
1.4 Public Review of Draft EIR.....	1-5
<b>2.0 Project Description and Environmental Setting.....</b>	<b>2-1</b>
2.1 Project Location .....	2-1
2.2 Project Objectives .....	2-1
2.3 Project Description .....	2-5
2.4 Required Permits and Approvals .....	2-17
2.5 Cumulative Project List .....	2-17
2.6 California Native American Tribe Consultation .....	2-19
<b>3.0 Environmental Analysis.....</b>	<b>3-1</b>
3.1 Aesthetics.....	3-2
3.1.1 Environmental Setting .....	3-2
3.1.2 Impact Analysis .....	3-7
3.2 Agriculture .....	3-16
3.2.1 Environmental Setting .....	3-16
3.2.2 Impact Analysis .....	3-17
3.3 Air Quality.....	3-20
3.3.1 Environmental Setting .....	3-20
3.3.2 Impact Analysis .....	3-26
3.4 Biological Resources.....	3-33
3.4.1 Environmental Setting .....	3-33
3.4.2 Impact Analysis .....	3-34
3.5 Cultural and Tribal Cultural Resources .....	3-39
3.5.1 Environmental Setting .....	3-39
3.5.2 Impact Analysis .....	3-49
3.6 Energy.....	3-54
3.6.1 Environmental Setting .....	3-54
3.6.2 Impact Analysis .....	3-56

3.7 Geology and Soils .....	3-59
3.7.1 Environmental Setting .....	3-59
3.7.2 Impact Analysis .....	3-64
3.8 Greenhouse Gas Emissions .....	3-68
3.8.1 Environmental Setting .....	3-68
3.8.2 Impact Analysis .....	3-71
3.9 Hazards and Hazardous Materials.....	3-73
3.9.1 Environmental Setting .....	3-73
3.9.2 Impact Analysis .....	3-81
3.10 Hydrology and Water Quality .....	3-83
3.10.1 Environmental Setting .....	3-83
3.10.2 Impact Analysis .....	3-97
3.11 Land Use Planning.....	3-106
3.11.1 Environmental Setting .....	3-106
3.11.2 Impact Analysis .....	3-108
3.12 Noise .....	3-114
3.12.1 Environmental Setting .....	3-114
3.12.2 Impact Analysis .....	3-116
3.13 Public Services.....	3-119
3.13.1 Environmental Setting .....	3-119
3.13.2 Impact Analysis .....	3-122
3.14 Recreation .....	3-125
3.14.1 Environmental Setting .....	3-125
3.14.2 Impact Analysis .....	3-126
3.15 Transportation .....	3-128
3.15.1 Environmental Setting .....	3-128
3.15.2 Impact Analysis .....	3-132
3.16 Utilities and Service Systems.....	3-146
3.16.1 Environmental Setting .....	3-146
3.16.2 Impact Analysis .....	3-154
<b>4.0 Other CEQA Considerations .....</b>	<b>4-1</b>
4.1 Significant Irreversible Environmental Change.....	4-1
4.2 Growth-Inducing Impacts .....	4-1
4.3 Environmental Effects Which Cannot be Avoided .....	4-2



<b>5.0 Alternatives .....</b>	<b>5-1</b>
5.1 California Environmental Quality Act Requirements For Alternative Analysis .....	5-1
5.2 Project Objectives .....	5-1
5.3 Summary of the Project and Significant Impacts .....	5-2
5.3.1 Summary of Project .....	5-2
5.3.2 Alternatives Considered and Rejected .....	5-2
5.3.3 Alternatives To The Proposed Project.....	5-2
5.3.4 Environmentally Superior Alternative .....	5-5
<b>6.0 References .....</b>	<b>5-9</b>
6.1 Organizations and Persons Consulted .....	6-1
6.2 Citations .....	6-1
<b>7.0 Report Preparers .....</b>	<b>7-1</b>

## LIST OF TABLES

<b>Table 1-1.</b> Comment Letters Received in Response to IS/NOP .....	1-2
<b>Table 1-2.</b> General Areas of Known Controversy .....	1-3
<b>Table 1-3.</b> CEQA Checklist Questions Found Not to be Significant in the IS .....	1-3
<b>Table 2-1.</b> Conceptual Site Plan Summary.....	2-11
<b>Table 2-2.</b> New High School No. 8 Construction Schedule .....	2-16
<b>Table 2-3.</b> Anticipated Permits and Approvals.....	2-17
<b>Table 2-4.</b> Cumulative Project List .....	2-18
<b>Table 3-1.</b> Obtrusive Light Limitations for Exterior Lighting Installations .....	3-13
<b>Table 3-2.</b> Attainment Status of Ventura County .....	3-20
<b>Table 3-3.</b> National and State Ambient Air Quality Standards .....	3-22
<b>Table 3-4.</b> Applicable VCAPCD Rules .....	3-24
<b>Table 3-5.</b> Applicable Goals and Policies for the City of Oxnard .....	3-25
<b>Table 3-6.</b> Project Construction Emissions of Criteria Pollutants (lb/day) .....	3-29
<b>Table 3-7.</b> Project Operation Emissions of Criteria Pollutants (lb/day) .....	3-29
<b>Table 3-8.</b> Carbon Monoxide Analysis .....	3-31
<b>Table 3-9.</b> Special-Status Wildlife Species with Potential to Occur .....	3-34
<b>Table 3-10.</b> City of Oxnard Goals and Policies Applicable to the Proposed Project .....	3-55
<b>Table 3-11.</b> City of Oxnard Goals and Policies Applicable to the Proposed Project .....	3-70
<b>Table 3-12.</b> Annual Greenhouse Gas Emissions.....	3-71
<b>Table 3-13.</b> City of Oxnard General Plan Consistency Analysis.....	3-109
<b>Table 3-14.</b> Fire Station Locations .....	3-119
<b>Table 3-15.</b> Oxnard Police Department Response Times for 2015-2018.....	3-120
<b>Table 3-16.</b> City Park and Recreation Standards .....	3-122
<b>Table 3-17.</b> City Park and Recreation Standards .....	3-125
<b>Table 3-18.</b> Existing Intersection Peak Hour Levels of Service .....	3-130
<b>Table 3-19.</b> 2016 RTP/SCS Consistency Analysis .....	3-134
<b>Table 3-20.</b> Project Trip Generation.....	3-135
<b>Table 3-21.</b> Existing plus Project Intersection Levels of Service .....	3-136

## LIST OF TABLES (Continued)

<b>Table 3-22.</b> Cumulative Plus Project Intersection Levels of Service .....	3-137
<b>Table 3-23.</b> Project Trip Generation – Buildout Conditions.....	3-139
<b>Table 3-24.</b> Buildout plus Project Intersection Levels of Service .....	3-139
<b>Table 3-25.</b> Summary of Existing and Projected Water Supplies (acre-feet) <sup>1</sup> .....	3-146
<b>Table 5-1.</b> Summary of Project Alternatives .....	5-9

## LIST OF FIGURES

<b>Figure 2-1.</b> Project Location and Vicinity Map .....	2-2
<b>Figure 2-2.</b> Project Site and Adjacent Area .....	2-3
<b>Figure 2-3.</b> Conceptual Site Map .....	2-7
<b>Figure 2-4.</b> Overall South Elevation of OUHSD High School No. 8 .....	2-9
<b>Figure 2-5.</b> Civic Center Act Areas .....	2-13
<b>Figure 3-1.</b> View of Rose Avenue Windrow Trees Looking Southwest from Site Northern Border.....	3-3
<b>Figure 3-2.</b> View of Rose Avenue Windrow Trees Looking South from Site Western Border.....	3-4
<b>Figure 3-3.</b> View of Rose Avenue Street Trees Looking North from Site Western Border.....	3-10
<b>Figure 3-4.</b> View of Camino Del Sol Street Trees Looking East from Site Southern Border.....	3-11
<b>Figure 3-5.</b> View of Wall on Site Eastern Border Looking North from Site Southern Border .....	3-12
<b>Figure 3-6.</b> Oxnard Plain Aquifer Profile .....	3-85
<b>Figure 3-7.</b> Major Reservoir Locations.....	3-90
<b>Figure 3-8.</b> Existing Street Network/Project Site Location .....	3-129

## APPENDICES

**Appendix A: NOP/IS, Scoping Meeting Materials, and Comment Letters Received**

**Appendix B: Lighting Plan**

**Appendix C: Air Quality Reports**

**Appendix D: Cultural Resources Reports**

**Appendix E: Geotechnical/Geohazard Reports**

**Appendix F: Phase I Environmental Site Assessment**

**Appendix G: Preliminary Environmental Assessment**

**Appendix H: Supplemental Site Investigation**

**Appendix I: Water Pipeline Safety Hazard Assessment**

**Appendix J: Water Resources System Reports**

**Appendix K: Traffic Impact Analysis**

## ACRONYMS/ABBREVIATIONS

Acronyms/Abbreviations	Definition
%	percent
AB	Assembly Bill
ADS	Advanced Drainage Systems, Inc.
ADT	Average Daily Trips
AF	acre-feet
AFY	acre-feet per year
amsl	Above Mean Sea Level
AP	Alquist-Priolo
APE	Area of Potential Effect
AWPF	Advanced Water Purification Facility
AQMP	Air Quality Management Plan
ASCE	American Society of Civil Engineers
AST	above ground storage tank
AWPF	Advanced Water Purification Facility
AWSC	all-way stop control
bgs	Below Ground Surface
BMP	Best Management Practice
BP	Before Present
°C	degrees Celsius
CAAA	Clean Air Act Amendments of 1990
CAAQS	California Ambient Air Quality Standards
CAD	Computer-aided Drafting
Cadna	Computer Aided Noise Abatement
CalARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
CalEMA	California Emergency Management Agency
CALGREEN	California Green Building Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CA MUTCD	<i>California Manual on Uniform Traffic Control Devices</i>
CARB	California Air Resources Board
CBC	California Building Code

Acronyms/Abbreviations	Definition
CCA	Civic Center Act
CCAA	California Clean Air Act
CCR	California Code of Regulations
cd	candela
CD	Community Development
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CDMG	California Department of Conservation, Division of Mines and Geology
CDWR	California Department of Water Resources
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
cfs/ac	cubic foot per second per acre
CG	Commercial General
CGP	Construction General Permit
CGS	California Geological Survey
CH <sub>4</sub>	Methane
CIE	International Commission on Illumination
CMA	Congestion Management Authority
CMP	Congestion Management Program
CMWD	Calleguas Municipal Water District
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2e</sub>	carbon dioxide equivalent
COPC	Chemical of Potential Concern
C-R	Community Reserve
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
CURB	City Urban Growth Boundary
CWA	Clean Water Act
DAR	Dial a Ride

Acronyms/Abbreviations	Definition
dB	decibels
dBA	A-weighted decibels
DDD	4,4'-DDD
DDE	4,4'-DDE
DDT	4,4'-DDT
DDW	Division of Drinking Water
DOGGR	Division of Oil, Gas, and Geothermal Resources
DOT	Department of Transportation
DSA	Division of the State Architect
DSL	digital subscriber line
DSOD	Division of Safety of Dams
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EI	Expansion Index
EIR	Environmental Impact Report
EPA	(United States) Environmental Protection Agency
EPRCRA	Emergency Planning and Community Right-to-Know Act
ESA	Endangered Species Act
ESP	Earth Systems Pacific
ET	evapotranspiration
FAR	Federal Aviation Regulations
fc	footcandle
FCGMA	Fox Canyon Groundwater Management Agency
FD	Federally Delisted
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FP	CDFW Fully Protected
ft	foot or feet
ft <sup>2</sup>	square foot
FTA	Federal Transit Administration
g	grams
GCT	Gold Coast Transit
GHG	greenhouse gas
GPCD	gallons per capita per day
gpm	gallons per minute

Acronyms/Abbreviations	Definition
GREAT	Groundwater Recovery Enhancement and Treatment
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWP	global warming potential
H <sub>2</sub> S	hydrogen sulfide
HAZWOPER	Hazardous Waste Operations Emergency Response
HCM	Highway Capacity Manual
HFC	hydrofluorocarbon
HI	Hazard Index
HSC	(California) Health and Safety Code
HSWA	Hazardous and Solid Waste Amendments Act
HU	Hydrologic Unit
HVAC	Heating, Ventilation, and Air Conditioning
ICC	International Code Council
ICS	Infrastructure and Community Services
ICU	Intersection Capacity Utilization
ILS	instrument landing system
IS	Initial Study
ITE	Institute of Transportation Engineers
km	kilometer
LADWP	Los Angeles Department of Water and Power
LAFCo	Local Agency Formation Commission
LAS	Lower Aquifer System
lb/day	pounds per day
LCC	Land Capability Classification
LED	light-emitting diode
LEL	Lower Explosive Limit
L <sub>eq</sub>	Equivalent Continuous Sound Level
LESA	Land Evaluation and Site Assessment
LID	low impact development
LIM	Land Inventory and Monitoring
L <sub>max</sub>	maximum instantaneous noise level
LOS	Level of Service
LSA	LSA Associates, Inc.
LTE	long term evolution

Acronyms/Abbreviations	Definition
LTS	less than significant impact
LTS/M	less than significant with mitigation
LUST	leaking underground storage tank
m <sup>3</sup>	cubic meter
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MCE <sub>R</sub>	Risk-Targeted Maximum Considered Earthquake
MDL	method detection limit
µg	microgram
mg	milligram
mg/L	milligrams per liter
µg/m <sup>3</sup>	micrograms per cubic meter
MGD	million gallons per day
mg/kg	milligrams per kilogram
MLD	Most Likely Descendant
MMTCO <sub>2</sub> e	million metric tons of CO <sub>2</sub> equivalent
MND	Mitigated Negative Declaration
MOE	Measure of Effectiveness
mph	miles per hour
MPO	Metropolitan Planning Organization
MRR	mandatory reporting regulation
MS4	Municipal Separate Storm Sewer System
MSL	mean sea level
MT	metric tons
MTCO <sub>2</sub> e	metric tons of CO <sub>2</sub> -equivalents
MWD	Metropolitan Water District
MWDSC	Metropolitan Water District of Southern California
N <sub>2</sub> O	Nitrous Oxide
NAAQS	National Ambient Air Quality standards
NAHC	Native American Heritage Commission
NAT	Native American Tribe
NBVC	Navy Base Ventura County
NPS	National Park Service
NE	northeast
NECSP	Northeast Community Specific Plan



Acronyms/Abbreviations	Definition
NFA	No Further Action
NF <sub>3</sub>	nitrogen trifluoride
NHM	Natural History Museum
NI	no impact
NO <sub>2</sub>	nitrogen dioxide
NOA	Notice of Availability
NOI	Notice of Intent
NOP	Notice of Preparation
NOT	Notice of Termination
NO <sub>x</sub>	nitrogen oxides (nitrogen oxide and nitrogen dioxide)
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NW	northwest
NWI	National Wetlands Inventory
O <sub>3</sub>	ozone
OCP	organochlorine pesticide
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
O-H	Oxnard-Hueneme
OHP	Office of Historic Preservation
OMC	Oxnard Municipal Code
OPD	Oxnard Police Department
OPR	Office of Planning and Research
OPSC	Office of Public School Construction
OS	Open Space
OSHA	Occupational Safety and Health Administration
OSHDPD	Office of Statewide Health Planning & Development
OTC	Oxnard Transit Center
OTM	Oxnard Traffic Model
OUHSD	Oxnard Union High School District
OWTP	Oxnard Wastewater Treatment Plant
PAH	polyaromatic hydrocarbon
Pb	lead
PCB	polychlorinated biphenyl

Acronyms/Abbreviations	Definition
PCSMP	Post-Construction Storm Water Management Plan
PEA	Preliminary Endangerment Assessment
PFC	perfluorocarbon
PGA	peak ground acceleration
PGI	Provenience Group, Inc.
PHT	peak hour trip
PM	particulate matter
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
POTW	publicly owned treatment works
ppb	parts per billion
ppm	parts per million
ppmv	parts per million by volume
PRC	Public Resources Code
PRIMP	Paleontological Resource Impact Mitigation Program
psig	per square inch gauge
R1PD	Single Family Residential Planned Development
RCRA	Resources Conservation and Recovery Act
REC	Recognized Environmental Concern
RLM	Residential Low Medium
RRD	Rice Road Drain
RSL	Regional Screening Level
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
S	BLM Sensitive Species
S	Significant and Unavoidable
S <sub>1</sub>	1-second period
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SB18	State Senate Bill 18
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCC	South Central Coast
SCCIC	South Central Coastal Information Center
SCS	Sustainable Community Strategy

Acronyms/Abbreviations	Definition
SD	State Delisted; Storm Drain
SDS	Safety Data Sheet
SDWA	Safe Drinking Water Act
SE	southeast
SF <sub>6</sub>	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SGMP	Sustainable Groundwater Management Plan
SHMA	Seismic Hazard Mapping Act
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>4</sub>	sulfates
SOAR	Save Open Space and Agricultural Resources
SOI	Sphere of Influence
SO <sub>x</sub>	oxides of sulfur
sq. ft.	square feet
SSC	CDFW Species of Special Concern
SSI	Supplemental Site Investigation
SVOC	semivolatile organic compound
SW	Southwest
SWP	State Water Project
SWPCP	Stormwater Pollution Control Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCS	Traffic and Circulation Study
TDS	total dissolved solids
TGM	Technical Guidance Manual
TMDL	Total Maximum Daily Load
TPHd	diesel range total petroleum hydrocarbons
TPHg	gasoline range total petroleum hydrocarbons
TPHmo	motor oil total petroleum hydrocarbons
tpy	tons per year
TWSC	two-way stop control
UAS	Upper Aquifer System
UBC	Uniform Building Code
URM	Unreinforced Masonry

Acronyms/Abbreviations	Definition
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWCD	United Water Conservation District
UWMP	Urban Water Management Plan
V/C	volume-to-capacity
VCA	Voluntary Cleanup Agreement
VCAPCD	Ventura County Air Pollution Control District
VCPWA	Ventura County Public Works Agency
VCREA	Ventura County Regional Energy Alliance
VCTC	Ventura County Transportation Commission
VCWPD	Ventura County Watershed Protection District
VdB	vibration velocity level
V/C	volume-to-capacity
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	waste discharge requirement
WL	CDFW Watch List
WMA	Watershed Management Area
WPHA	Water Pipeline Hazard Assessment
WSAP	<i>Water Supply Allocation Plan</i>
WSDM	<i>Water Surplus and Drought Management Plan</i>

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## 1.0 INTRODUCTION

### 1.1 EIR TYPE, PURPOSE, AND INTENDED USE

This Draft Project Environmental Impact Report (EIR) was prepared by Oxnard Union High School District (OUHSD or the District) to evaluate potential impacts and related mitigation from construction and operation for the proposed New High School No. 8 Project inclusive of curriculum programs (proposed project). The OUHSD proposes to construct and operate a new neighborhood high school with Civic Center Act (CCA) facilities to support up to 2,500 high school students in grades 9-12. As Lead Agency for the California Environmental Quality Act (CEQA), the District has prepared this Draft EIR in compliance with the State CEQA Guidelines.

CEQA requires agencies to consider the environmental impacts of a proposed project for which they have discretionary authority before taking action on the project. An EIR is an informational document required to be prepared when a proposed project may have a significant impact on the environment. The information contained in an EIR includes summarized technical data, maps, plot plans, diagrams, and similar relevant information with sufficient detail to permit an assessment of significant environmental impacts by reviewing agencies and members of the public. Per State CEQA Guidelines Section 15002, the basic purposes of CEQA are to:

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify the ways in which environmental damage can be avoided or significantly reduced;
3. Prevent significant, avoidable impact to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

This EIR serves as a public disclosure document explaining the effects of the proposed project on the environment, alternatives to the project, and ways to minimize adverse effects and to increase beneficial effects. The EIR will be used by OUHSD and responsible and trustee agencies with jurisdiction over portions of the project prior to deciding whether to approve or permit project components. Findings shall also be presented as applicable.

### 1.2 SCOPE OF EIR

The content of this EIR was established based on the findings in the Initial Study (IS) and input received from agencies and individuals during the public scoping process. Topics discussed in detail in this EIR include: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Energy, Geology and Soils, Greenhouse Gas (GHG) Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services, Recreation, Transportation, and Utilities and Service Systems.

#### **Initial Study**

The District prepared an IS for the proposed project that is included in Appendix A of this EIR. The IS helped focus the EIR on the effects determined to be potentially significant, identified effects determined not to be significant, and provided an explanation for determination of impacts found not to be significant. Based on the environmental review contained in the IS, OUHSD determined that implementation of the proposed project may have a significant effect on the environment and that an EIR is required. Topics identified in the IS as potentially significant and requiring additional environmental review in the EIR include the following:

- Aesthetics
- Agriculture
- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Noise
- Energy
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems

### **Notice of Preparation and Public Scoping Meeting**

The District issued a Notice of Preparation (NOP) of an Environmental Impact Report and Notice of Public Scoping Meeting for the New High School No. 8 on February 19, 2019. The NOP was filed with the Office of Planning and Research (OPR) and the Ventura County Clerk. The NOP and IS were also posted on the District's website and available for public review during normal business hours at the District office. The NOP/IS 30-day public review period was from February 19 to March 20, 2019.

OUHSD conducted a public scoping meeting for the proposed project on March 6, 2019. The purpose of the scoping meeting was to receive public comment and input regarding the appropriate scope and content of the EIR. In attendance was Mr. Doug Spondello, Senior Planner for the City of Oxnard (City). No other individuals from other public agencies or the general public attended. After the formal presentation there was a general discussion of the proposed project. Mr. Doug Spondello indicated the City would be submitting written comments.

In response to the NOP, OUHSD received 5 comment letters during the public review period that are identified in Table 1-1.

Appendix A of this EIR includes the NOP, IS, Scoping Meeting Materials, and copies of the comment letters received.

**Table 1-1.** Comment Letters Received in Response to IS/NOP

<b>Name</b>	<b>Agency (if applicable)</b>
Miya Edmonson, IGR/CEQA Branch Chief	California Department of Transportation, District 7
Jeffrey Lambert, AICP, Community Development Director	City of Oxnard, Development Services, Planning Division
Monique Wilber, Conservation Program Support Supervisor	California Department of Conservation, Division of Land Resource Protection
Ping Chang, Manager, Compliance and Performance Monitoring	Southern California Association of Governments
Steve DeGeorge, Planning Director	Ventura County Transportation Commission

### **Known Areas of Controversy**

Areas of controversy include known issues or concerns raised by agencies and the public regarding the proposed project. Known issues of concern to OUHSD are based on preliminary agency consultation, public scoping meeting comments, and comment letters received in response to the NOP (Appendix A). The general key areas of known controversy and the location where the issue is addressed in the EIR are provided in Table 1-2.



**Table 1-2.** General Areas of Known Controversy

Area of Concern	EIR Section Where Topic is Addressed
Development of Remaining Portions of the Maulhardt Property	Section 2.5 Cumulative Project List Section 3.0 Environmental Analysis (cumulative evaluation for each resource topic)
Agriculture Mitigation	Section 3.2 Agriculture

**Issues Found Not To Be Significant**

Per *State CEQA Guidelines Section 15143*, the EIR shall focus on the significant effects on the environment. Effects dismissed in an IS as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless the Lead Agency subsequently receives information inconsistent with the finding in the IS.

Table 1-3 identifies the CEQA checklist questions found not to be significant in the IS and identifies checklist questions found not to be significant in the IS but included in the detailed EIR analysis based on new information, including public scoping comments received.

**Table 1-3.** CEQA Checklist Questions Found Not to be Significant in the IS

Resource Topic	IS Checklist Topic Found Not to be Significant in IS and Discussed Only in Appendix A of this EIR*	IS Checklist Topic Found Not to be Significant in IS but Included in Detailed EIR Discussion Based on New Information
Aesthetics	<ul style="list-style-type: none"> <li>State Scenic Highways</li> </ul>	
Agriculture & Forest Resources	<ul style="list-style-type: none"> <li>Conflict with a Williamson Act Contract or existing agricultural zoning.</li> <li>Conflict or cause rezoning of forest or timberland.</li> <li>Loss or conversion of forest land</li> <li>Other changes to the environment that could result in conversion of farmland or farmland</li> </ul>	
Biological Resources	<ul style="list-style-type: none"> <li>Riparian habitat or other sensitive natural community</li> <li>Effects on federally protected wetlands or protected waters of the state</li> <li>Provisions of an adopted habitat conservation plan or natural community conservation</li> </ul>	
Cultural and Tribal Cultural Resources	<ul style="list-style-type: none"> <li>Human Remains</li> </ul>	<ul style="list-style-type: none"> <li>Human Remains</li> </ul>
Geology and Soils	<ul style="list-style-type: none"> <li>Rupture of a known earthquake fault</li> <li>Liquefaction</li> <li>Landslides</li> <li>Geologic unit or soil that is unstable</li> <li>Expansive Soil</li> <li>Septic tanks</li> </ul>	

Resource Topic	IS Checklist Topic Found Not to be Significant in IS and Discussed Only in Appendix A of this EIR*	IS Checklist Topic Found Not to be Significant in IS but Included in Detailed EIR Discussion Based on New Information
Hazards and Hazardous Materials	<ul style="list-style-type: none"> <li>• Routine transport, use, or disposal of hazardous materials</li> <li>• Reasonably foreseeable upset and accident conditions</li> <li>• Emit or handle hazardous waste near a school</li> <li>• Safety hazard near airport</li> <li>• Implementation of emergency response plan or emergency evacuation plan</li> <li>• Wildland fire</li> </ul>	
Land Use Planning	<ul style="list-style-type: none"> <li>• Physically divide an established community</li> </ul>	
Mineral Resources	<ul style="list-style-type: none"> <li>• Loss of known mineral resource of value to region or state</li> <li>• Loss of locally important mineral resource recovery site</li> </ul>	
Noise	<ul style="list-style-type: none"> <li>• Excessive noise levels in the vicinity of a private airstrip or public airport</li> </ul>	
Population and Housing	<ul style="list-style-type: none"> <li>• Induce unplanned population growth into the area</li> <li>• Displace substantial number of people or housing units requiring replacement housing</li> </ul>	
Public Services	<ul style="list-style-type: none"> <li>• Adverse impacts on schools</li> <li>• Adverse impacts on other public facilities</li> </ul>	
Recreation	<ul style="list-style-type: none"> <li>• Increased use of existing parks</li> </ul>	
Utilities and Service Systems	<ul style="list-style-type: none"> <li>• Generation of solid waste in excess of State or local standards, local infrastructure capacity or in conflict with waste reduction goals.</li> <li>• Statutes and regulations related to solid waste</li> </ul>	
Wildfires	<ul style="list-style-type: none"> <li>• Impair an adopted emergency response plan or emergency evacuation plan</li> <li>• Exposure of project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire</li> <li>• Require infrastructure that could exacerbate fire risk or result in impacts on the environment</li> <li>• Expose people or structures to significant risks</li> </ul>	

\* Refer to the IS (Appendix A of this EIR) for discussion of impact determination.

## 1.3 EIR ORGANIZATION

This EIR has been prepared in accordance with *California State CEQA Guidelines* and includes the required content as discussed in Article 9, commencing with Section 15120 of these Guidelines. The format of the EIR is organized into sections so the reader can easily locate information about the project and its specific areas.

**Executive Summary.** This section contains a brief summary of the proposed actions and its consequence in clear and concise language. The summary identifies each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; areas of controversy known to the Lead Agency, including issues raised by agencies and the public; and issues to be resolved including the choice among alternatives and whether or how to mitigate significant effects.

**Section 1: Introduction.** Describes the EIR type, purpose, and intent. It includes a discussion of the scope of the EIR, organization, and draft EIR public review period.

**Section 2: Project Description and Environmental Setting.** Describes the project background and objectives; project location and Site characteristics; project description; and intended uses of the EIR including, a list of agencies that are expected to use the EIR in their decision making, list of required permits and approval, and list of related environmental review and consultation requirements.

**Section 3: Environmental Analysis.** Analysis in this Section is discussed by individual resource topics. This section includes a discussion of the physical environmental conditions (baseline conditions) and regulatory settings, methodology, significance thresholds, potential project direct, in-direct, and cumulative impacts, and any mitigation measures needed to reduce project impacts.

**Section 4: Other CEQA Considerations.** Describes issues required by CEQA that are not included in other sections. This section includes a discussion of significant irreversible environmental change, growth-inducing impacts, and environmental effects which cannot be avoided.

**Section 5: Alternatives Analysis.** Describes the alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects.

**Section 6: References.** Includes the sources used to prepare this EIR, including organizations and persons consulted.

**Section 7: Report Preparation.** Includes the individuals involved in preparing this EIR.

**Appendices.** Includes supporting data for contents of this EIR.

## 1.4 PUBLIC REVIEW OF DRAFT EIR

This Draft EIR is available for public review and comment during a 45-day public review period beginning on August 15, 2019 and ending on September 30, 2019 at 5:00 PM. The Draft EIR is available for public review at:

- OUHSD District Office at 309 South K Street Oxnard, California 93030 during normal business hours.
- OUHSD's website at: <https://www.oxnardunion.org/>
- City of Oxnard Downtown Main Library at 251 South A Street, Oxnard, California 93030

All interested parties are invited to submit written comments on the Draft EIR; please submit your comments to:

Mr. Jeffrey Weinstein, Assistant Superintendent, Business Services  
Oxnard Union High School District  
309 South K Street  
Oxnard, California 93030

### Public Meeting

OUHSD will conduct a public meeting for the proposed project. The purpose of the public meeting is to solicit and receive public comment regarding the Draft EIR. The public meeting for the Draft EIR is scheduled for August 29, 2019, at 6 p.m. at the District Office Board Room, 220 South K Street, Oxnard, CA 93030.

## 2.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

### 2.1 PROJECT LOCATION

The project Site includes approximately 49.75-acres of the Maulhardt Property, a 107.25-acre property (APN 214-002-059) located in the City of Oxnard, California. Access to the project Site is provided from Camino Del Sol and Rose Avenue. The geographic coordinates of the Site are approximately Latitude 34°12' 29.47" North, Longitude 119°09' 19.07" West. A Project Location, Vicinity Map, and surrounding land uses are shown in Figure 2-1 and Figure 2-2.

Surface elevations at the Site are approximately 54-60 feet above mean sea level (amsl) (Google Earth Pro 2018). The project Site is located in the southern area of the Santa Clara River flood plain. As of March 2017, the Santa Clara River Levee in Oxnard was in the process of rehabilitation construction and undergoing design/engineering/CEQA work (City of Oxnard 2017b). The Santa Clara River is located approximately 2.8 miles northwest of the project Site. The Site topography is relatively flat with surface elevations ranging from approximately 54 feet amsl in the south to 60 feet amsl in the north (Google Earth Pro 2018).

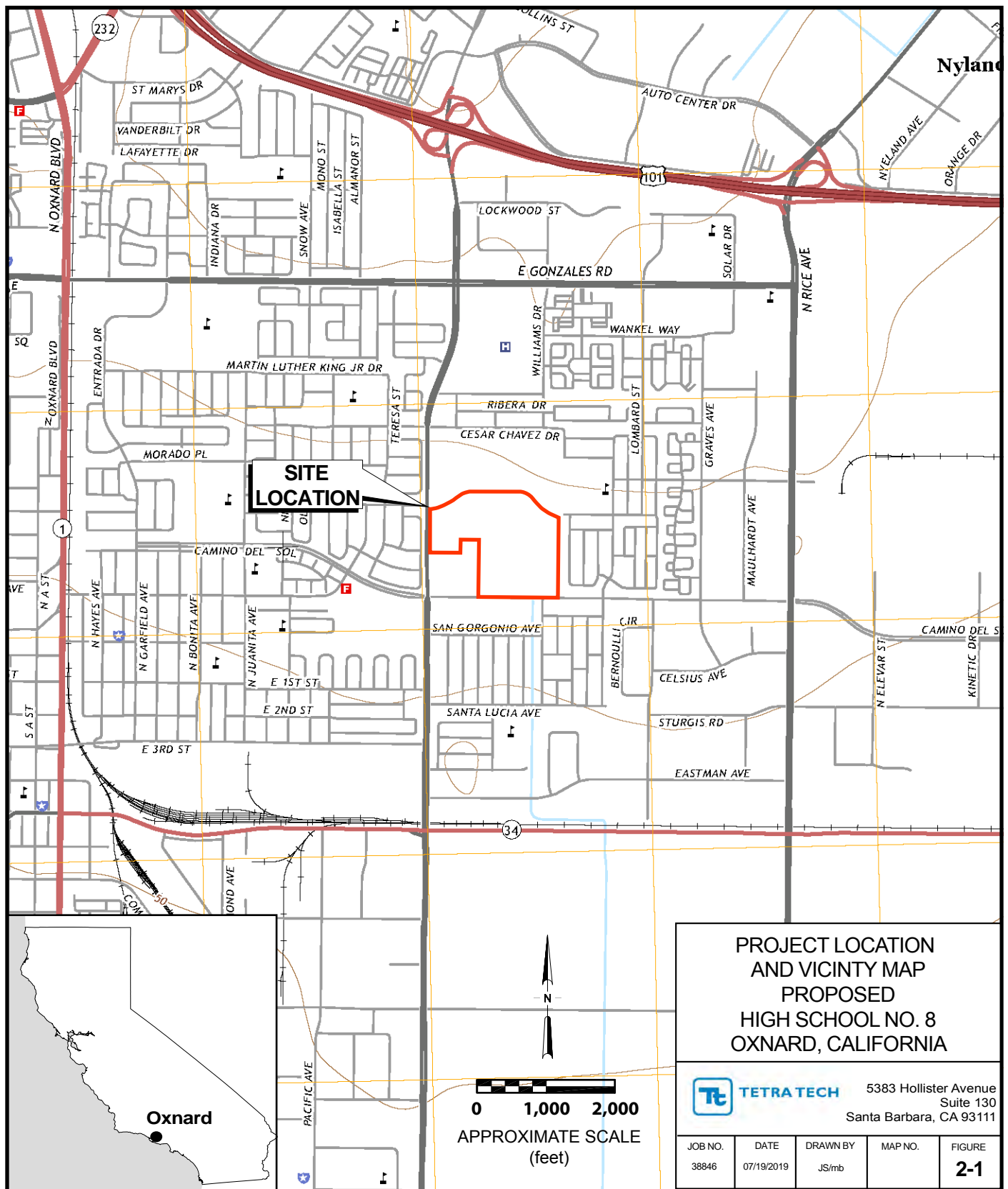
The project Site has a General Plan Land Use designation of RLM and OS, Urban Village. The project Site is located in the Northeast Community Specific Plan (NECSP) area of Oxnard, Ventura County, California. The zoning designations are Single Family Residential Planned Development (R1PD) and Community Reserve (C-R).

The project Site is currently used for agriculture and the cultivation of strawberries was observed during a January 29, 2019 field visit. Historical aerial photographs, Google Earth images, and information from the project Site owners indicate that the Site has been used for cultivation of row crops from as early as 1869 to the present. The Site is adjacent to agricultural land to the north; single family residential land and Rio Rosales Elementary School to the east; single and multi-family residential and commercial land to the south; and single-family residential land to the west. There are three public parks within 0.5-mile of the Site: Del Sol Park to the southwest, Thompson Park to the south, and West Village Park to the northwest.

### 2.2 PROJECT OBJECTIVES

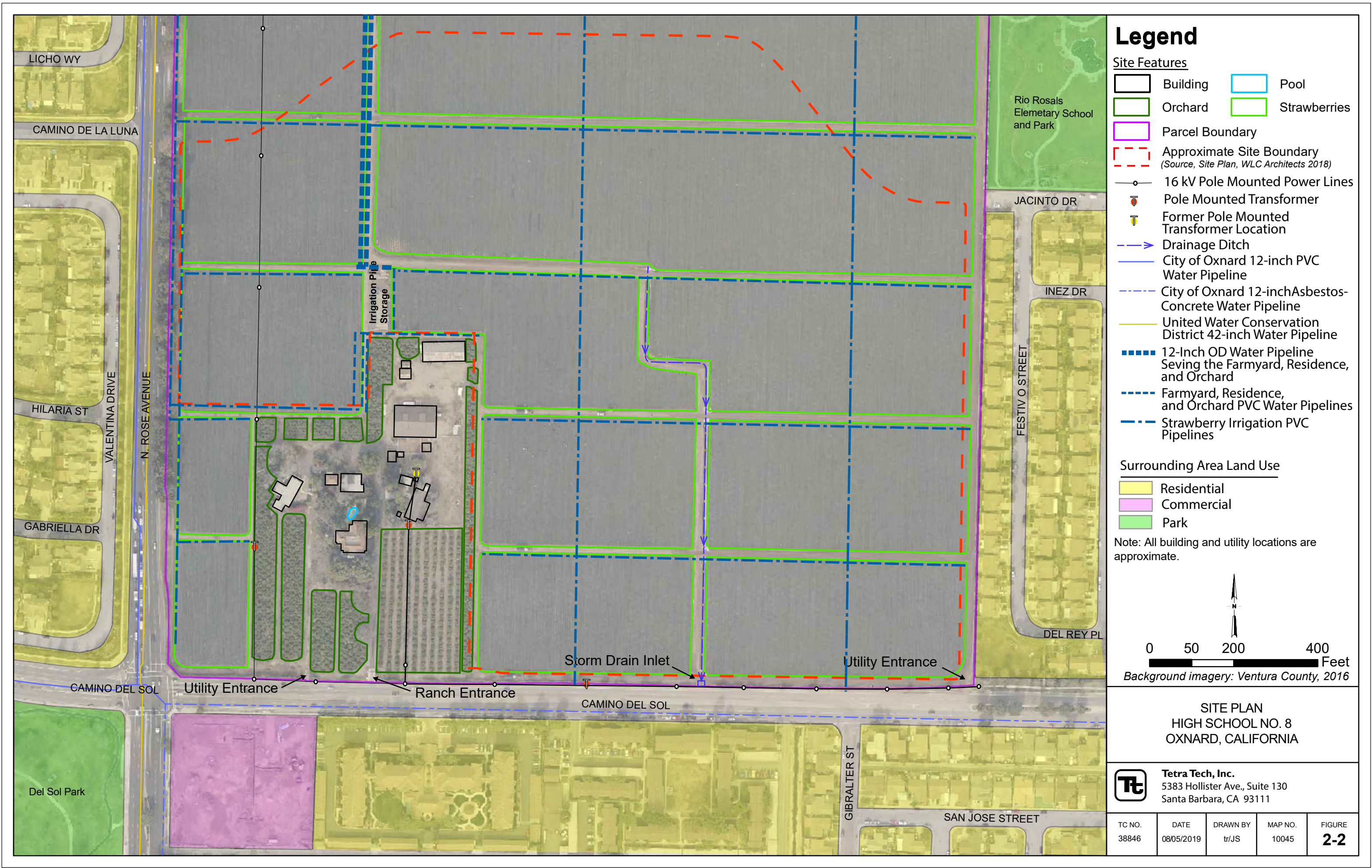
The objectives of the proposed project include the following:

- Accommodate existing and projected future student enrollment within the District;
- Provide new facilities that meet the District's educational specifications;
- Provide a new neighborhood high school to accommodate 2,500 students in permanent classroom facilities;
- Build and maintain school facilities that reflect the wise and efficient use of limited land resources; and
- Provide for new community appropriate recreational facilities.



- Notes: 1) Base Map Oxnard Quadrangle 7.5 Minutes Series, U. S. Geological Survey (2015).  
 2) Site Boundary Extropolated from *Site Plan* (WLC 5 fW jhWg 2018)







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## 2.3 PROJECT DESCRIPTION

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The OUHSD proposes to construct and operate a new state of the art neighborhood high school to accommodate existing and anticipated future enrollment in the District. The new school facilities are designed to meet the educational and recreational needs of up to 2,500 students in grades 9-12 onsite.

### Legal Lot

Per the current vesting deed (20171124-00152497 O.R.), the existing parcel at the northeast corner of Rose Avenue and Camino Del Sol (APN 214-0-020-595) is essentially one large rectangle with the exception of some road right-of-way dedications along the north side of Camino Del Sol and the east side of Rose Avenue (near Camino Del Sol).

The California statutes pertaining to Subdivision Map Act state that the transfer in ownership of a portion of existing parcel, to a public agency, may be accomplished by recordation of a proper grant deed without the necessity of a subdivision map. The OUHSD qualifies as 'a public agency', relative to these statutes. After the recordation of the grant deed transferring title of the school Site parcel to the OUHSD, the remaining portions of the original 'rectangle' will consist of two separate (non-adjointing) parcels – one northerly of the school Site parcel and one at the northeast corner of Rose Avenue and Camino Del Sol. If necessary, a Certificate of Compliance can be recorded covering both of these parcels.

### Land Use Planning

Notwithstanding a General Plan or Zoning Amendment, School Districts are not required to comply with the local building ordinances, except for City and/or county ordinances (1) regulating drainage improvements and conditions; (2) regulating road improvements and conditions; and (3) requiring the review and approval of grading plans, to the extent such ordinance provisions relate to the design and construction of on-Site improvements that affect drainage, road conditions and traffic flow.

However, The District shall give consideration to the specific requirements and conditions of City or county ordinances relating to the design and construction of off-Site improvements and related items.

The District is coordinating with the City relative to conformance of its Site use with the existing General Plan and zoning ordinances pursuant to Government Code Sections 65402 and Public Resources Code Section 21151.2.

To the extent any such use is not in conformance, the District either will work with the City for any necessary General Plan and/or Zoning Amendments or consider State Law for overruling such requirements as to applicable school facilities construction per Government Code Section 53094.

### School Facilities

The proposed project would comprise approximately 281,311 square feet (sq. ft.) of building and structures and provide approximately 722 parking spaces on the project Site. In addition, the proposed project includes a variety of recreational areas to accommodate the recreational needs of the student's onsite. These facilities include a variety of play fields, hard courts, and a pool. The proposed buildings would be of wood or metal frame construction or cast in place concrete tilt up construction with concrete slab-on-grade foundations. Access to the school would be provided from Camino Del Sol and half width of a proposed new "Central Road" to the north of the project Site that would connect to the existing Camino De La Luna and Jacinto Drive. The proposed circulation is being planned in cooperation with City Planning, Public Works, and Traffic staff. A conceptual Site map is included as Figure 2-3 and a summary of anticipated development is provided in Table 2-1. Figure 2-4 shows an overall south elevation of the new high school.

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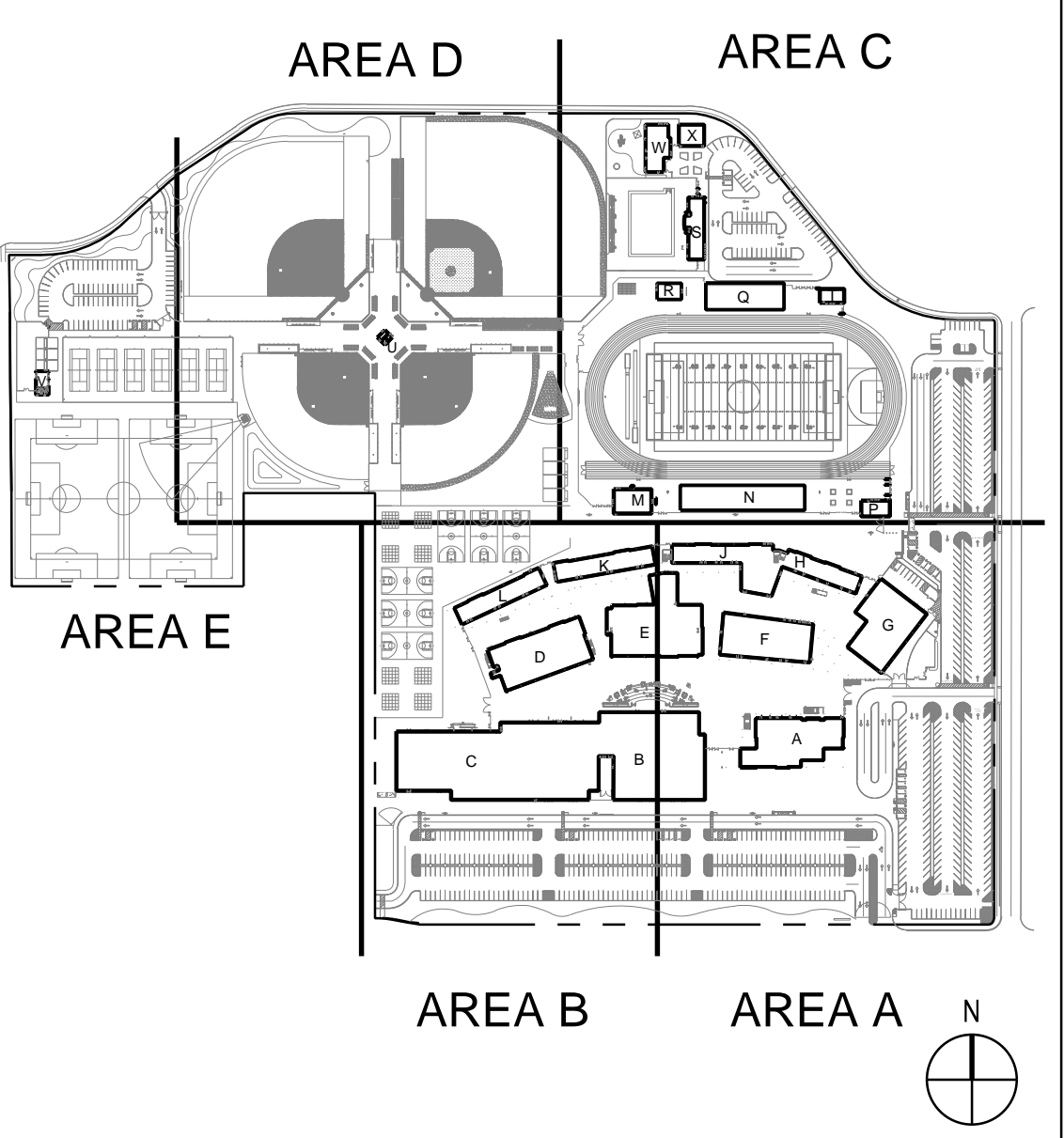
1. SEE ENLARGED SITE PLANS FOR ADDITIONAL INFORMATION.  
2. SAFE DISPERSAL AREA NOT INCLUDED. IN THE EVENT OF AN EMERGENCY, STUDENTS AND STAFF WILL LEAVE CAMPUS THROUGH ADA ACCESSIBLE GATES LOCATED AROUND ENTIRE SITE.

NOTES/REF NOTES

DESIGN PROFESSIONAL IN GENERAL RESPONSIBLE CHARGE STATEMENT: THE POT IDENTIFIED IN THESE CONSTRUCTION DOCUMENTS MEETS THE REQUIREMENTS OF THE CURRENT APPLICABLE CALIFORNIA BUILDING CODE (CBC) ACCESSIBILITY PROVISIONS FOR PATH OF TRAVEL, REQUIREMENTS FOR ALTERATIONS, ADDITIONS AND STRUCTURAL REPAIRS. AS PART OF THE DESIGN OF THIS PROJECT, THE POT WAS EXAMINED AND ANY ELEMENTS, COMPONENTS OR PORTIONS OF THE POT THAT WERE DETERMINED TO BE NONCOMPLIANT WITH THE CBC HAVE BEEN IDENTIFIED AND THE CORRECTIVE WORK NECESSARY TO BRING THEM INTO COMPLIANCE HAS BEEN INCLUDED WITHIN THE SCOPE OF THIS PROJECT'S WORK THROUGH DETAILS, DRAWINGS AND SPECIFICATIONS. INCORPORATED INTO THESE CONSTRUCTION DOCUMENTS, ANY NONCOMPLIANT ELEMENTS, COMPONENTS OR PORTIONS OF THE POT THAT WILL NOT BE CORRECTED BY THIS PROJECT BASED ON VALUATION THRESHOLD LIMITATIONS OR A FINDING OF UNREASONABLE HARDSHIP ARE INDICATED IN THESE CONSTRUCTION DOCUMENTS.

DURING CONSTRUCTION, IF POT ITEMS WITHIN THE SCOPE OF THE PROJECT REPRESENTED AS CBC COMPLIANT ARE FOUND TO BE NONCONFORMING BEYOND REASONABLE CONSTRUCTION TOLERANCES, THE ITEMS SHALL BE BROUGHT INTO COMPLIANCE WITH THE CBC AS A PART OF THIS PROJECT BY MEANS OF A CONSTRUCTION CHANGE DOCUMENT.

SITE LEGEND



SITE KEY PLAN

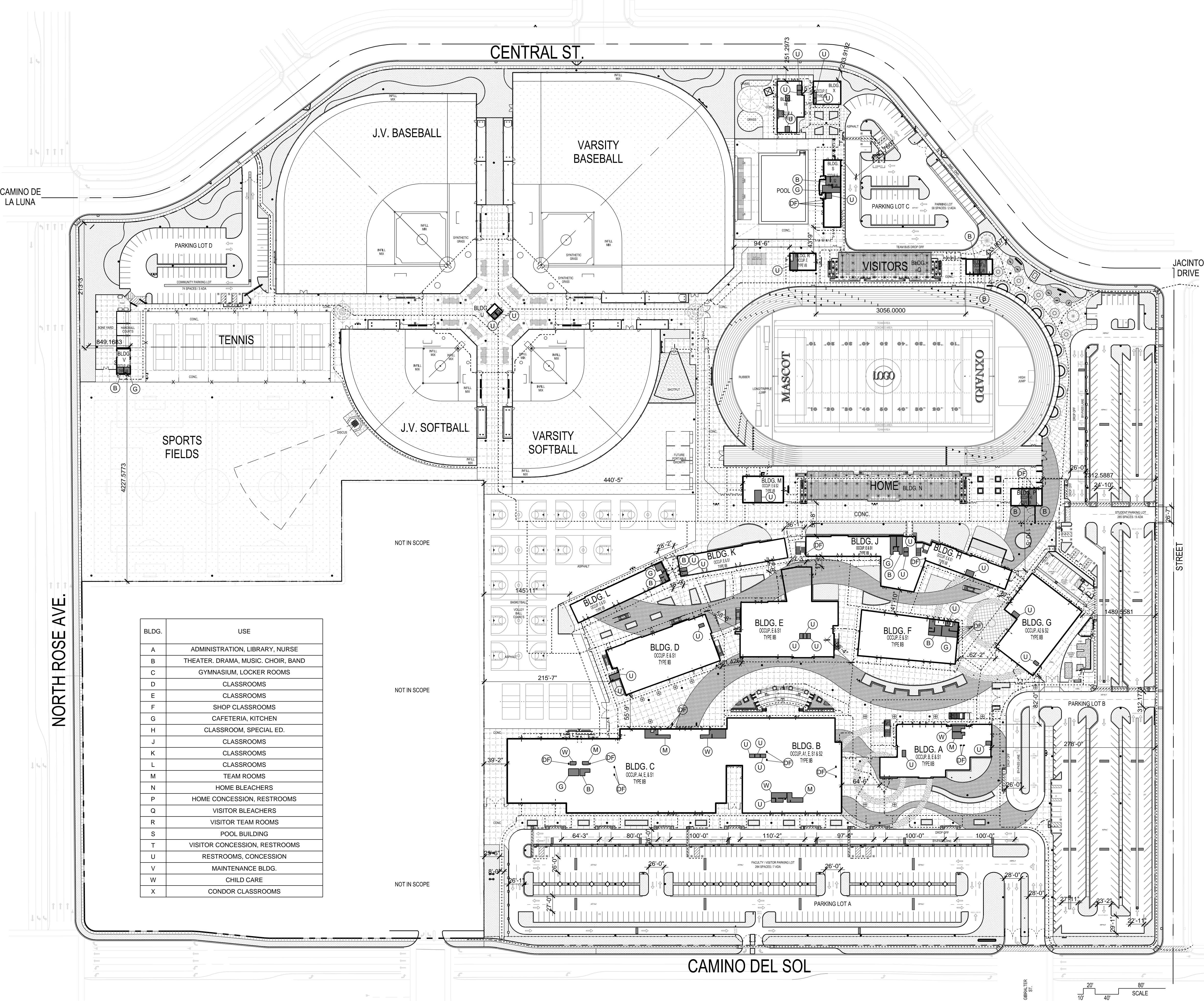
MAP SOURCE: WLC ARCHITECTS, JULY 8, 2019

CONCEPTUAL SITE MAP  
PROPOSED HIGH SCHOOL NO. 8  
OXNARD, CALIFORNIA



5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

JOB NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38846	07/23/2019	TR/js/mb		2-3



BLDG.	USE
A	ADMINISTRATION, LIBRARY, NURSE
B	THEATER, DRAMA, MUSIC, CHOIR, BAND
C	GYMNASIUM, LOCKER ROOMS
D	CLASSROOMS
E	CLASSROOMS
F	SHOP CLASSROOMS
G	CAFETERIA, KITCHEN
H	CLASSROOM, SPECIAL ED.
J	CLASSROOMS
K	CLASSROOMS
L	CLASSROOMS
M	TEAM ROOMS
N	HOME BLEACHERS
P	HOME CONCESSION, RESTROOMS
Q	VISITOR BLEACHERS
R	VISITOR TEAM ROOMS
S	POOL BUILDING
T	VISITOR CONCESSION, RESTROOMS
U	RESTROOMS, CONCESSION
V	MAINTENANCE BLDG.
W	CHILD CARE
X	CONDOR CLASSROOMS

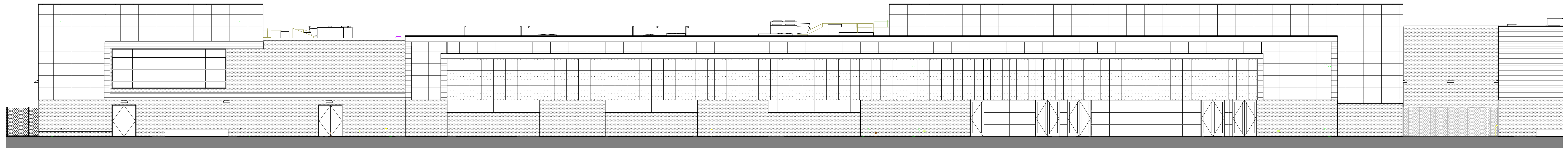
TABLE 11B-208.2 PARKING SPACES	
TOTAL NUMBER OF PARKING SPACES PROVIDED IN PARKING FACILITY	MINIMUM NUMBER OF REQUIRED ACCESSIBLE PARKING SPACES
1 TO 25	1
26 TO 50	2
51 TO 75	3
76 TO 100	4
101 TO 150	5
151 TO 200	6
201 TO 300	7
301 TO 400	8
401 TO 500	9
501 TO 1000	2 PERCENT OF TOTAL
1001 AND OVER	20, PLUS 1 FOR EACH 100, OR FRACTION THEREOF, OVER 1000

PARKING TABULATIONS:  
PARKING LOT A: 283 SPACES, 7 ADA SPACES (3 VAN ACCESSIBLE)  
PARKING LOT B: 285 SPACES, 9 ADA SPACES (3 VAN ACCESSIBLE)  
PARKING LOT C: 58 SPACES, 3 ADA SPACES (1 VAN ACCESSIBLE)  
PARKING LOT D: 74 SPACES, 3 ADA SPACES (1 VAN ACCESSIBLE)  
TOTALS: 730 SPACES, 22 ADA SPACES (8 VAN ACCESSIBLE)

RESTROOM DESIGNATION:  
B = BOY'S  
G = GIRL'S  
M = MEN'S  
W = WOMEN'S  
U = UNISEX  
DF = DRINKING FOUNTAIN

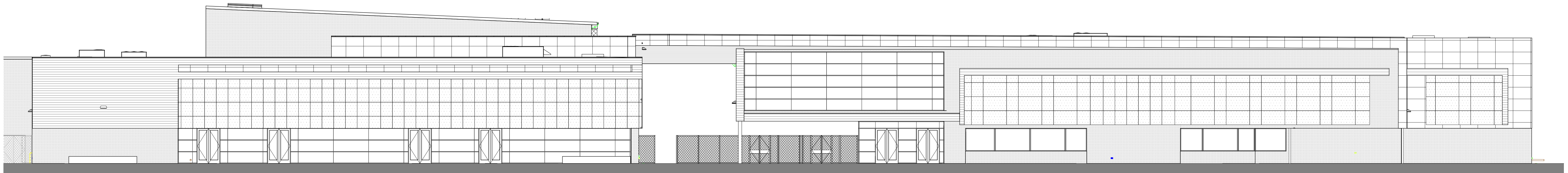


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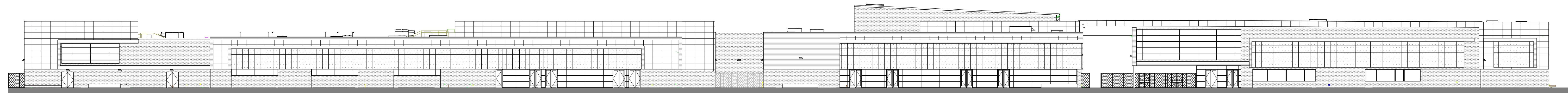
CIVIC BUILDINGS PARTIAL SOUTH ELEVATION 1:150

1



CIVIC BUILDINGS PARTIAL SOUTH ELEVATION 1:150

2



CIVIC BUILDINGS OVERALL SOUTH ELEVATION 1:300

3

SOUTH ELEVATION DRAWING  
PROPOSED HIGH SCHOOL NO. 8  
OXNARD, CALIFORNIA



5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

JOB NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38846	07/29/2019			2-4

MAP SOURCE: WLC ARCHITECTS, JULY 24, 2019

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**Table 2-1.** Conceptual Site Plan Summary

Building	Building Area ft <sup>2</sup>	Notes
A - Administration, Library, Nurse, 1st Floor	13,959	Two-Story
A - Administration, Library, Nurse, 2nd Floor	16,823	
B - Theater, Drama, Music, Choir, Band, 1st Floor	29,275	Two-Story
B - Theater, Drama, Music, Choir, Band, 2nd Floor	2,110	
C - Gymnasium, Locker Rooms	48,832	One-Story
D - Classrooms, 1st Floor	14,720	Two-Story
D - Classrooms, 2nd Floor	15,083	
E - Classrooms, 1st Floor	18,256	Two-Story
E - Classrooms, 2nd Floor	11,716	
F - Shop Classrooms	12,613	One-Story
G - Cafeteria, Kitchen	13,313	One-Story
H - Classrooms, Special Ed., 1st Floor	5,092	Two-Story
H - Classrooms, Special Ed., 2nd Floor	7,076	
J - Classrooms, 1st Floor	10,909	Two-Story
J - Classrooms, 2nd Floor	10,677	
K - Classrooms, 1st Floor	6,488	Two-Story
K - Classrooms, 1st Floor	10,924	
L - Classrooms, 1st Floor	6,060	Two-Story
L - Classrooms, 1st Floor	9,213	
M - Team Room	3,253	One-Story
N - Home Bleachers	-	-
P - Home Concession, Restrooms	1,654	One-Story
Q - Visitor Bleachers	-	-
R - Visitor Team Rooms	1,360	One-Story
S - Pool Building	3,620	One-Story
T - Visitor Concession, Restrooms	1,247	One-Story
U - Restrooms, Concession	400	One-Story
V - Maintenance & Ops.	1,056	One-Story
W - Child Care	3,657	One-Story
X - Condor Care	1,925	One-Story
<b>Total</b>	<b>281,311</b>	
Parking Lot	Parking Lot ft <sup>2</sup>	No. Parking Spaces
A	180,088	290
B	123,300	294
C	3,230	61
D	33,115	77
<b>Total</b>	<b>339,733</b>	<b>722</b>

Sport Facility	Facility ft <sup>2</sup>	Ground Surface
Track/Football Field	159,031	Turf
Varsity Baseball Field	135,347	Turf
JV Baseball Field	113,034	Turf
Varsity Softball Field	55,259	Turf
JV Softball Field	53,695	Turf
Soccer Field	182,831	Turf
Basketball Courts	52,960	Paved
Tennis Courts	43,590	Paved
Pool	7,240	Paved
<b>Total</b>	<b>802,987</b>	

Notes: ft<sup>2</sup> Square Foot. All square footage estimates are approximate.

#### Recreational Facilities and Civic Center Act

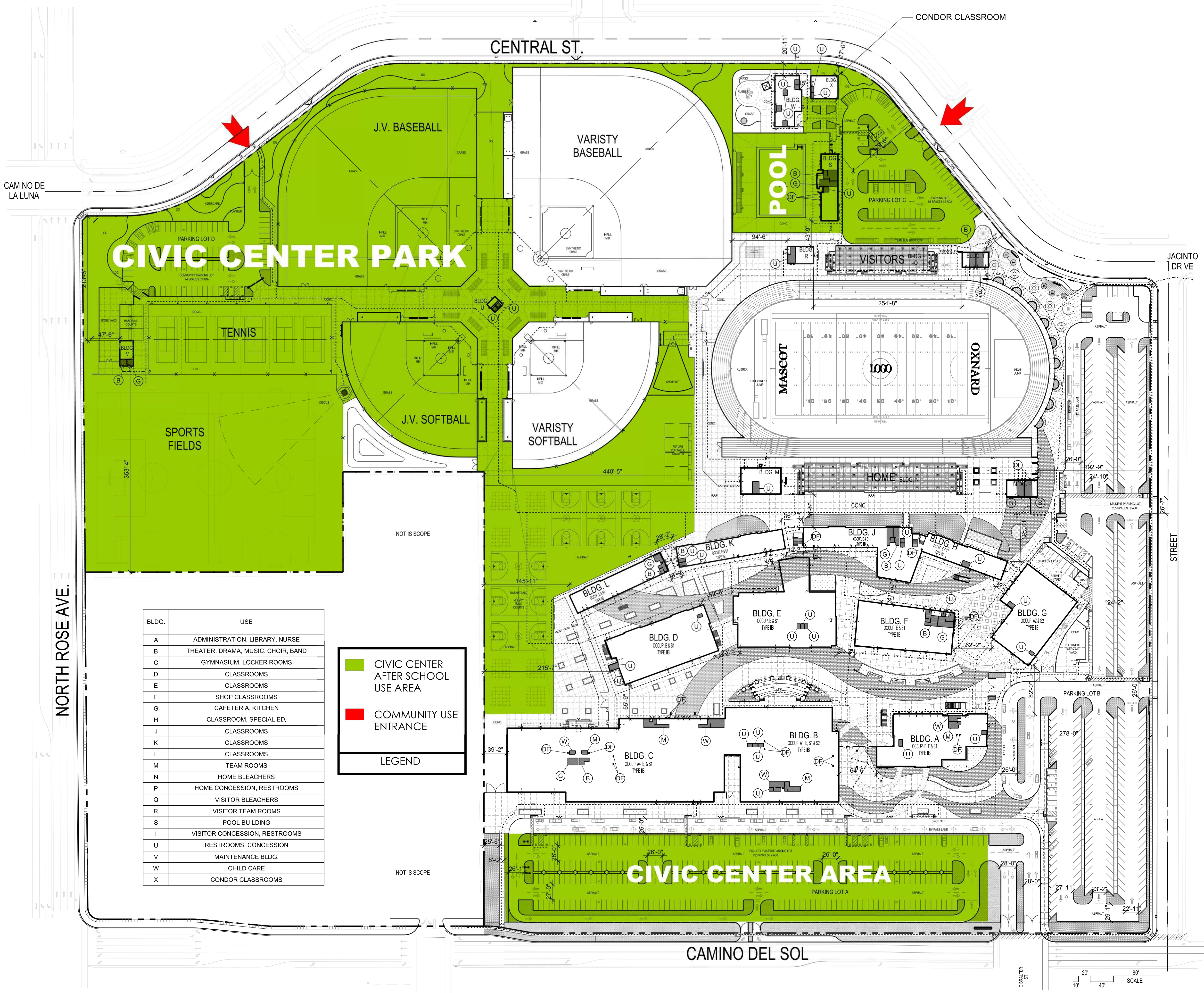
This proposed project includes a variety of recreational features including a pool, football/ track and field stadium, baseball/softball fields, soccer fields, tennis courts and basketball courts. A CCA is proposed for community use with the community to provide additional recreation opportunities to the community after school hours. Facilities proposed for community use under the CCA include practice fields, JV baseball and softball fields, pool, outdoor basketball courts, tennis courts, performing arts center and parking. Please refer to Figure 2-5, Civic Center Act Areas.

#### Project Design Features

##### *Landscaping*

The landscape concept for the proposed project includes the surfacing and planting of the soft-top sports facilities, Site irrigation, and ornamental plantings of trees, shrubs, and groundcover. The proposed irrigation system includes drip, smart clock, flow sensor, rotor, bubbler, and pop up spray components that would result in the system meeting California Assembly Bill (AB) 1881, Cal Green, and Title 23 (Chapter 2) requirements. Plant species selected would add to the aesthetic appeal of the campus.





BLDG.	USE
A	ADMINISTRATION, LIBRARY, NURSE
B	THEATER, DRAMA, MUSIC, CHOIR, BAND
C	GYMNASIUM, LOCKER ROOMS
D	CLASSROOMS
E	CLASSROOMS
F	SHOP CLASSROOMS
G	CAFETERIA, KITCHEN
H	CLASSROOM, SPECIAL ED.
J	CLASSROOMS
K	CLASSROOMS
L	CLASSROOMS
M	TEAM ROOMS
N	HOME BLEACHERS
P	HOME CONCESSION, RESTROOMS
Q	VISITOR BLEACHERS
R	VISITOR TEAM ROOMS
S	POOL BUILDING
T	VISITOR CONCESSION, RESTROOMS
U	RESTROOMS, CONCESSION
V	MAINTENANCE BLDG.
W	CHILD CARE
X	CONDOR CLASSROOMS

CIVIC CENTER AFTER SCHOOL USE AREA

COMMUNITY USE ENTRANCE

LEGEND

TABLE 11B-208.2 PARKING SPACES	
TOTAL NUMBER OF PARKING SPACES PROVIDED IN PARKING FACILITY	MINIMUM NUMBER OF REQUIRED ACCESSIBLE PARKING SPACES
1 TO 25	1
26 TO 50	2
51 TO 75	3
76 TO 100	4
101 TO 150	5
151 TO 200	6
201 TO 300	7
301 TO 400	8
401 TO 500	9
501 TO 1000	2 PERCENT OF TOTAL
1001 AND OVER	20, PLUS 1 FOR EACH 100, OR FRACTION THEREOF, OVER 1000

**PARKING TABULATIONS:**

**PARKING LOT A:** 283 SPACES, 7 ADA SPACES (3 VAN ACCESSIBLE)

**PARKING LOT B:** 285 SPACES, 9 ADA SPACES (3 VAN ACCESSIBLE)

**PARKING LOT C:** 58 SPACES, 3 ADA SPACES (1 VAN ACCESSIBLE)

**PARKING LOT D:** 74 SPACES, 3 ADA SPACES (1 VAN ACCESSIBLE)

**TOTALS:** 730 SPACES, 22 ADA SPACES (8 VAN ACCESSIBLE)

**RESTROOM DESIGNATION:**

(B) = BOY'S

(G) = GIRL'S

(M) = MEN'S

(W) = WOMEN'S

(U) = UNISEX

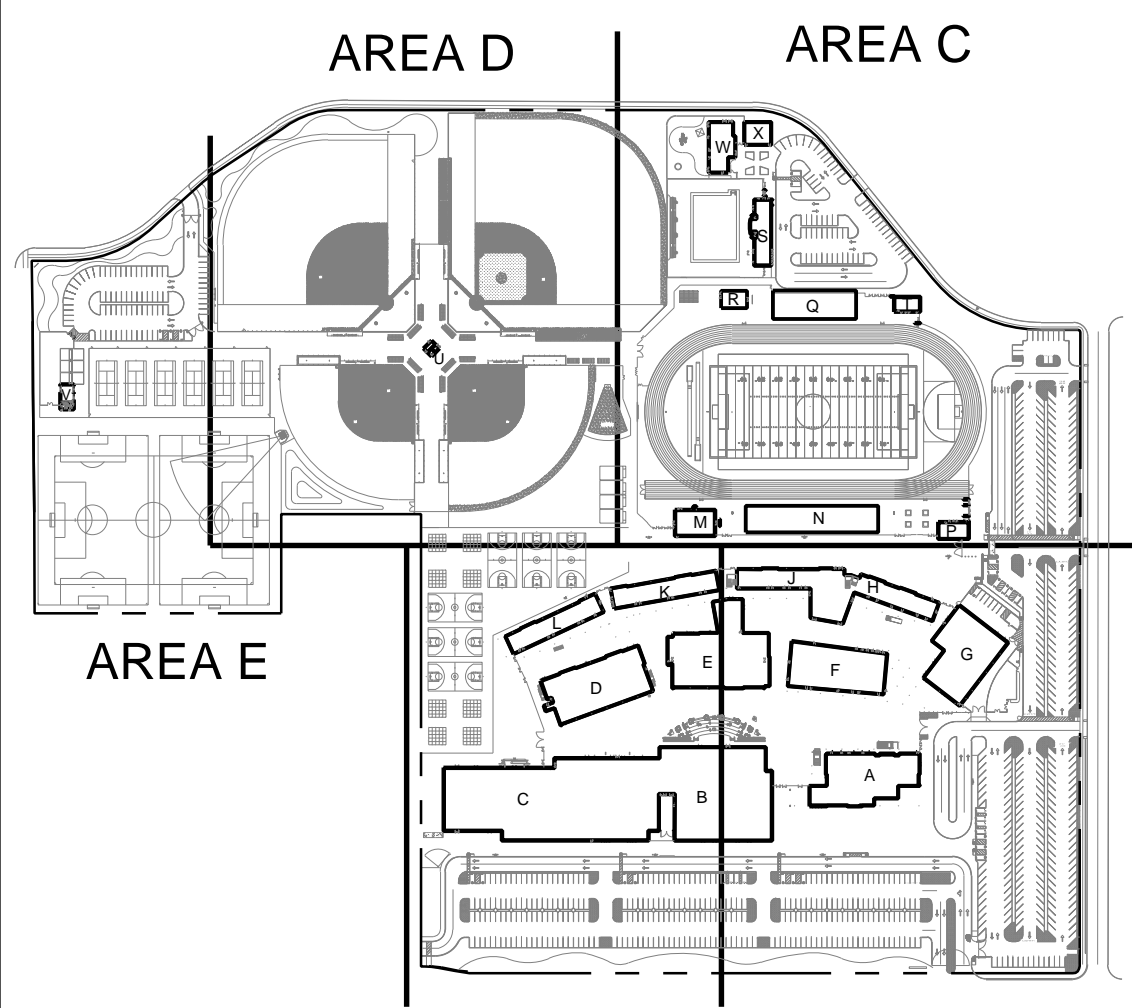
(DF) = DRINKING FOUNTAIN

NOTES/REF NOTES

DESIGN PROFESSIONAL IN GENERAL RESPONSIBLE CHARGE STATEMENT: THE POT IDENTIFIED IN THESE CONSTRUCTION DOCUMENTS MEETS THE REQUIREMENTS OF THE CURRENT APPLICABLE CALIFORNIA BUILDING CODE (CBC) ACCESSIBILITY PROVISIONS FOR PATH OF TRAVEL REQUIREMENTS FOR ALTERATIONS, ADDITIONS AND STRUCTURAL REPAIRS. AS PART OF THE DESIGN OF THIS PROJECT, THE POT WAS EXAMINED AND ANY ELEMENTS, COMPONENTS OR PORTIONS OF THE POT THAT WERE DETERMINED TO BE NONCOMPLIANT WITH THE CBC HAVE BEEN IDENTIFIED AND THE CORRECTIVE WORK NECESSARY TO BRING THEM INTO COMPLIANCE HAS BEEN INCLUDED WITHIN THE SCOPE OF THIS PROJECT'S WORK THROUGH DETAILS, DRAWINGS AND SPECIFICATIONS INCORPORATED INTO THESE CONSTRUCTION DOCUMENTS. ANY NONCOMPLIANT ELEMENTS, COMPONENTS OR PORTIONS OF THE POT THAT WILL NOT BE CORRECTED BY THIS PROJECT BASED ON VALUATION THRESHOLD LIMITATIONS OR A FINDING OF UNREASONABLE HARDSHIP ARE INDICATED IN THESE CONSTRUCTION DOCUMENTS.

DURING CONSTRUCTION, IF POT ITEMS WITHIN THE SCOPE OF THE PROJECT REPRESENTED AS CBC COMPLIANT ARE FOUND TO BE NONCONFORMING BEYOND REASONABLE CONSTRUCTION TOLERANCES, THE ITEMS SHALL BE BROUGHT INTO COMPLIANCE WITH THE CBC AS A PART OF THIS PROJECT BY MEANS OF A CONSTRUCTION CHANGE DOCUMENT.

SITE LEGEND



SITE KEY PLAN

MAP SOURCE: WLC ARCHITECTS, JULY 8, 2019

CIVIC CENTER ACT AREAS  
PROPOSED HIGH SCHOOL NO. 8  
OXNARD, CALIFORNIA



5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

JOB NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38846	07/23/2019	TR/js/mb		2-5



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### *Lighting*

The proposed project will include necessary lighting for adequate nighttime safety and security. Campus lights will be shielded and directed downward to the extent feasible. Lighted playfields are proposed for the stadium and varsity baseball and softball fields.

### *Energy*

The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient light-emitting diode (LED) lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The parking lots and pathway pole-mounted lighting and sports field lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the project will be an energy-efficient type complying with the most recent energy code.

### *Water Saving Features*

The proposed project will incorporate a state-of-the-art drip irrigation system and a smart clock which automatically adjusts daily based on evapotranspiration (ET). All trees will have a separate valve allowing for water to be provided only as needed. Large turf areas will be irrigated by rotors and small turf areas will be irrigated by spray heads. The irrigation system will incorporate a master valve and flow sensor to shut down the system in case of line breakage.

### Offsite Infrastructure Improvements and Connections

#### *Stormwater Drainage*

The proposed project will route storm water from pervious and impervious surfaces via storm drain inlets, curbing, and piping and will continue to discharge to the Rice Road Drain construction. The City of Oxnard will hold the Maulhardt Property (and therefore, the proposed project) to the 1 cfs/ac runoff discharge rate, consistent with the 1987 Rice Road Watershed Agreement referenced in Jensen Design & Survey, Inc.'s *Hydrology Letter* (Jensen Design and Survey, Inc. 2019a). The remaining runoff is designed to be retained on-Site. The 1 cfs/ac flow rate was deemed an acceptable flow rate to prevent downstream flooding of the receiving water (Rice Road Drain). At the time of developing this Draft EIR, the precise routing of the storm water drainage features, discharge location to Rice Road Drain, and size of on-Site detention basins had not been finalized; however, the proposed project will be held to the 1 cfs/ac discharge rate. Proposed features include pre-treatment of runoff from the North and South Campuses with *Downstream Defender* hydrodynamic separators. The treated water would then flow into ADS Stormtech plastic chambers that will be installed under the basketball court area (North Campus) and the parking lot (South Campus). The North Campus will also have an infiltration system under the varsity softball field. Allowable discharges will bypass the ADS Stormtech system, but larger flows will be diverted into the infiltration system to meet City of Oxnard detention requirements. A portion of the runoff from the streets that will be constructed and dedicated to the City of Oxnard and surrounding the Site will be mitigated by upsizing the North and South Campus detention systems to retain this additional volume of runoff. The current design concept requires review and approval by the City.

#### *Transportation/Circulation*

While the educational facilities would be contained within the project Site; the City may require additional street and sidewalk improvements required to service the proposed project. Anticipated roadway improvements include the widening of Rose Avenue that would require removal of the existing windrow trees. A new half width access road is proposed to the north of the project Site as shown on the conceptual Site map (Figure 2-3). The City will dictate the final route for the access road. Anticipated sidewalk improvements and other circulation improvements required to

adequately accommodate the project Site will be identified based on coordination with the City's Planning and Public Works Departments.

#### *Utility Connections*

The proposed project includes utility connections, including required improvements needed to provide adequate service to the Site for water, sewer, gas, electric, data/telecommunications, and storm water in compliance with existing regulations.

#### Project Construction

Phased construction is anticipated to begin in February 2020 and would take approximately 25 months to construct. The project construction activities are anticipated to occur in phases and include grading, building construction, paving, building interiors, and off-Site street work; some portions of construction phases will occur concurrently with other phases. Project construction shall be under the supervision of the OUHSD and state inspector as applicable.

Anticipated construction equipment includes graders/compactors, backhoes, bulldozers, excavators, pavers, and water trucks. During the building construction phases, material delivery trucks, including tractor trailers, would be bringing raw and finished materials and equipment. Paving for parking areas and hardcourts are expected to be asphalt. Concrete for foundations floor slabs and walkways and plazas shall be delivered via concrete mixing vehicles.

The number of construction workers at the proposed project Site would vary day by day. Typical days would have an average of 30 personnel on-Site, while peak levels may reach 150 personnel, depending on activities and the project schedule. Personnel working on the project Site will park on-Site. Contractor field personnel for each phase would typically include a project superintendent, assistant superintendent, and a clerk. A project manager may also be assigned to be on-Site for a portion of each work day. One project inspector is expected to be on-Site for each phase. Specialty inspectors would be on-Site for various activities such as welding or masonry. Periodically architects, engineers, public agency and District staff would be on-Site to review progress (typically weekly).

Table 2-2 identifies the anticipated phase, duration, labor/personnel, and equipment for the high school construction. Planned construction hours are Monday through Friday from 7:00 am to 6:00 pm.

**Table 2-2.** New High School No. 8 Construction Schedule

Phase	Duration <i>(assumes 8 hours per day)</i>	Equipment Type	Personnel
Grading	150 days	Water Truck, Bulldozer, Grader, Backhoe, Scraper	15
Building Construction	750 days	Earthmoving Scrapers, Haulers, Dump Trucks, Excavators	30-50 (first 6 months) 100-150 (remaining project duration)
Paving	Concrete Duration = 90 days Asphalt Duration = 60 days	Asphalt Paver, Vibratory Roller, Vibratory Base Compacter	15-25
Building Interiors	550 days	Hammers, Metal/Wood Saws, Welders, Air Ratchets, Screw Guns, Various Hand Tools	100-150
Off-Site Street Work	200-250 days	Asphalt Paver, Vibratory Roller, Vibratory Base Compacter, Water Truck, Grader, Backhoe	30-50

### Operation and Staffing

Operation of the new high school is anticipated for the 2022-2023 school year. The approximate number of employees for the high school opening was estimated to be 150 based on the educational specifications approved by the District Board. This includes administrative staff, teachers, coaching staff, aides, librarians, technology teachers, cafeteria workers, janitors and groundskeeping staff.

## 2.4 REQUIRED PERMITS AND APPROVALS

The EIR will be used by OUHSD and responsible and trustee agencies with jurisdiction over portions of the project prior to deciding whether to approve or permit project components. A public agency, other than the lead agency, that has discretionary approval power over a project is known as a “responsible agency” as defined by CEQA Guidelines Section 15381. Anticipated permits and approvals for the proposed project are identified in Table 2-3.

**Table 2-3.** Anticipated Permits and Approvals

Agency	Permit/Approval
Oxnard Union High School District	Approve Project (Educational Specifications, Design/Construction Funding and Associated Contract Approvals)/ EIR/ Parks Designation
City of Oxnard	Building Permits, Utilities, and Traffic/Adjacent Street Requirements
California Department of General Services, Division of State Architect	Approval of construction plans and CDE Site and Plan Approval
California Department of Toxic Substances Control	Approval of Preliminary Environmental Assessment (PEA) and Supplemental Site Investigation (SSI)
Los Angeles Regional Water Quality Control Board	Storm Water Pollution Prevention Plan
Office of Public School Construction (OPSC)	Approval of District/ Division of the State Architect (DSA)/ CDE State Matching Funds
California Department of Education (CDE)	Approval of construction plans and CDE Site and Plan Approval

## 2.5 CUMULATIVE PROJECT LIST

According to CEQA Guidelines Section 15130 (b) the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. Table 2-4 shows a list of past, present, and probable future projects used in the EIR cumulative analysis.

**Table 2-4.** Cumulative Project List

Project	Location	Description
Channel Islands Apartments	Statham Boulevard, Channel Islands Boulevard, Oxnard, CA	Two and three-story, 72-unit multi-family apartments and associated site improvements
Bank and Restaurant	2161 and 2181 N Rose Avenue, Oxnard, CA	Proposed bank building and restaurant with drive-thru on the former TGI Friday's restaurant location.
HQ- Mission Produce	1750 Solar Drive Oxnard, CA	Construct a 3-story office building over a single-story parking garage.
Clinicas	2001 Statham Boulevard Oxnard, CA	Proposed two-story medical clinic
Medical Office Building	1601 Raiders Way Oxnard, CA	One-story medical office building with related site improvements on approx. 0.66-acre vacant lot.
Cooper Road Mixed-Use	600 Cooper Road, Oxnard, CA	Mixed-use development for commercial/residential on a 7,640 sq. ft. lot.
Trinity Church at Trinity Plaza	1800 Camino Del Sol, Oxnard, CA	Request to permit a 7,400 sq. ft. church with seating for 250 persons on a 1.04-acre site.
New Distribution Warehouse	500 Elevar Street, Oxnard, CA	Construction of a new 67,000 sq. ft. tilt up single-story building
Distribution Warehouse	Sakioka Farms, Oxnard, CA	Construction of a four-story 2,629,000 sq. ft. warehouse distribution center; ancillary on and off-site improvements and a tentative map to subdivide the Specific Plan area to create 69 parcels for future development.
J&A Pre-Cooling Warehouse Addition	1720 Mountain View Avenue, Oxnard, CA	Proposed one-story 4,314 sq. ft. warehouse addition and 400 sq. ft. detached accessory storage building.
MWS Wire Industries Industrial/Warehouse Building	3000 Camino Del Sol, Oxnard, CA	Two-story industrial/warehouse tilt-up building
Cabot Industrial	2011, 2021, 2031 Cabot Place, Oxnard, CA	Single-Story 24,518 sq. ft. concrete tilt-up warehouse building with related interior improvements and exterior sitework.
Pacific Water Conditioning	2040 Eastman Avenue, Oxnard, CA	Single-story warehouse building

Source: Select residential, commercial and industrial projects identified by Mr. Bihis (4/23/19 email) to be included in the cumulative analysis from the City of Oxnard Planning Division Quarterly Project List, Updated April 2019.



In addition to the above projects, it is our understanding that a formal application has not been submitted to the City for the remaining portions of the Maulhardt Property. Should an application be submitted for the remaining land within Maulhardt Property, it would be processed through the City and require CEQA compliance with the City as Lead Agency. OUHSD has no jurisdiction over this remaining land.

The land owner has publicly identified in a pre-application and associated public City meetings potential changes to the remaining portions of the Maulhardt Property that are being considered for a potential residential project. As such, this can be considered a potentially reasonably foreseeable future project for the purpose of the OUHSD High School No. 8 EIR cumulative analysis. Therefore, this potential “project” is also being included in the EIR cumulative analysis since the proposed development intensity is greater than what is currently allowed under the previously approved specific plan for the property.

## 2.6 CALIFORNIA NATIVE AMERICAN TRIBE CONSULTATION

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**Have California Native American tribes (NAT) traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

OUHSD has not received written notification from California Native American tribes traditionally and culturally affiliated with the project area.

However, the OUHSD shall comply with local NAT during construction, including preconstruction notice.

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### 3.0 ENVIRONMENTAL ANALYSIS

For each impact identified, a statement of the level of significance of the impact is included. These levels of significance are defined as follows.

- No Impact: No adverse changes in the environment would result.
- Less Than Significant Impact: No substantial adverse change in the environment would result.
- Less Than Significant Impact with Mitigation Incorporated: A significant adverse impact or potentially substantial adverse change in the environment that can be reduced to a less than significant level with the incorporation of mitigation measures.
- Significant Impact: A substantial or potentially substantial adverse change in the environment that cannot be mitigated to a level of less than significant.

## 3.1 AESTHETICS

This section describes the proposed project's potential to affect visual resources (aesthetics) in the project area. As noted in the Initial Study (Appendix A), impacts associated with a designated scenic highway were found to have no significant impact and are not discussed in detail in the EIR. The visual resources to be analyzed include both natural and human-made features that make up the physical characteristics of the landscape. In general, natural resources include the landform, water, soil, and vegetation, while human-made features include physical structures, roads, etc. The analysis describes the potential aesthetic impacts of the proposed project on the existing landscape and discusses the compatibility of the proposed project with the existing aesthetic setting.

### 3.1.1 Environmental Setting

#### 3.1.1.1 Existing Conditions

##### Scenic Routes

The proposed project is not located adjacent to a designated State scenic highway or eligible State scenic highway, as identified on the California Scenic Highway Mapping System (Caltrans 2017) and as is discussed in the Initial Study (Appendix A). The City, in conjunction with Ventura County and the City of Port Hueneme has selected routes for the City's Scenic Highway System (City of Oxnard 2006). The nearest of these routes to the project Site is Rose Avenue, between U.S. Route 101 and State Route 1. The scenic route portion of Rose Avenue is located to the west of the project Site. This route has scenic values because of its views of the Oxnard-Camarillo Greenbelt and in the distance the Los Padres Mountains. Windrow trees, also considered scenic resources, are located on the east side of Rose Avenue between Camino del Sol and Cesar Chavez Drive as shown in Figures 3-1 and 3-2.

##### Visual Character

The visual characteristics of the City of Oxnard are made up of several natural and human-made aesthetic resources, including open spaces, beaches and coastline, agricultural areas, low rise commercial and residential development, as well as tall buildings associated with the City's skyline (City of Oxnard 2006). Visual characteristics in the project area include primarily residential development with agricultural uses, including the Oxnard-Camarillo Greenbelt. Agricultural greenbelt areas provide an important open space quality to the City of Oxnard's sphere of influence (SOI). The City's urban landscape is also considered an important aesthetic resource (City of Oxnard 2006).

The project Site is relatively flat and currently used for agriculture, as shown in Figure 2-2, Figure 3-1, and Figure 3-2. The Site is adjacent to agricultural land to the north; single family residential land and Rio Rosales Elementary School to the east; single and multi-family residential and commercial land to the south; and the existing Maulhardt Property and single-family residential land to the west.

##### Lighting

The project Site does not include any permanent sources of light. Light and glare sources in the vicinity of the project Site include the surrounding land uses described above, existing street lights located on the south side of Camillo del Sol and on the west side of Rose Avenue.





**View of Rose Avenue Windrow Trees  
Looking Southwest from Site Northern Border**



5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

TC NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38186	07/19/2019			<b>3-1</b>





**View of Rose Avenue Windrow Trees  
Looking South from Site Western Border**



5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

TC NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38186	07/19/2019			<b>3-2</b>



### 3.1.1.2 Regulatory Setting

#### Federal

No federal policies or regulations pertaining to aesthetics are applicable to the proposed project.

#### State

No federal policies or regulations pertaining to aesthetics are applicable to the proposed project.

#### Local

##### *City of Oxnard 2030 General Plan Goals and Policies*

Chapter 3, Community Development, establishes goals and policies for the distribution and intensity of land use types. The focus of this element is on revitalization of existing neighborhoods and new development within the community, and continued greenbelt and agriculture uses within the City's SOI. Applicable goals and policies specific to aesthetic resources include:

- Goal CD-1**      A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.
- CD-1.6**      **Public Facilities.** Enhance resident quality of life by providing adequate space for schools, libraries, parks and recreation areas, as well as space for the expansion of public facilities to support the community's vision.
- CD-1.8**      **Natural Resource Conservation.** Promote a high quality of life within the community, incorporating the retention of natural open space areas, greenbelts, and the provision of adequate recreational facilities.
- Goal CD-3**      A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.
- CD-3.4**      **Neighborhood Quality of Life Program.** Develop an ongoing program to assess parking, lighting, traffic safety, use and quality of alleys, public utilities, public and private lighting, housing quality, aesthetics, and related quality of life topics to identify and prioritize opportunities for neighborhood quality of life enhancement activities and sources of funding.
- Goal CD-7**      Development of vibrant mixed—use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.
- CD-7.12**      **Urban Village Collocation with Schools.** Promote the collocation of parks with school facilities for the purpose of enhancing available open space and recreation.
- Goal CD-9**      A high quality visual image and perception of the City.
- CD-9.1**      **Neighborhood Identity.** Recognize, preserve, and improve the visual identity and character of existing neighborhoods. Infill development shall respect historic structures and be of compatible scale and character with historic areas.
- CD-9.4**      **View Corridor Preservation.** Ensure all public and private investments positively contribute to the overall character of the City by minimizing impacts on important view corridors by creating edge treatments along greenbelt areas and a landscaped buffer corridor of at least 30 feet along designated scenic corridors and other major transportation corridors.
- CD-9.5**      **Unique Character Preservation.** Ensure that new public and private investment maintains the unique coastal and agricultural character of the City.
- Goal CD-14**      Expectations of higher quality design.

- CD-14.1**      **Design Review Process.** In the evaluation of development proposals, continue to ensure that public and private development projects comply with City design policies, plans, and guidelines.
- Chapter 4, Infrastructure and Community Services, sets goals and policies for traffic and circulation, long-term water supply, parks, public safety, schools, and other public and semi-public facilities and services. Applicable goals and policies specific to aesthetic resources include:
- Goal ICS-2**      A transportation system that supports existing, approved, and planned land uses throughout the City while maintaining a level of service “C” at designated intersections unless excepted.
- ICS-2.11**      **Scenic Highway Preservation.** Preserve and enhance the character of scenic highways, and publicly owned and utility rights-of-way.
- Chapter 5, Environmental Resources, addresses the conservation, development, and use of natural resources, and also explores the managed production of resources, significant buildings and historic sites, water resources, biological, and agricultural resources. Applicable goals and policies specific to aesthetic resources include:
- Goal ER-6**      Protected and enhanced natural setting and scenic resources.
- ER-6.1**      **Incorporate Views in New Development.** Preserve important public views and viewsheds by ensuring that the scale, bulk and setback of new development does not significantly impede or disrupt them and ensure that important vistas and view corridors are enhanced. Require development to provide physical breaks to allow views into these vistas and view corridors.
- ER-6.2**      **Protect and Enhance Major Scenic Resources.** Protect and enhance the scenic resources of the beaches, Channel Island Harbor, windrows, farmland, the Channel Islands, and surrounding mountains.
- ER-6.5**      **Control of Lighting and Glare.** Require that all outdoor light fixtures including street lighting, externally illuminated signs, advertising displays, and billboards use low-energy, shielded light fixtures which direct light downward and, where public safety would not be compromised, encourage the use of low-pressure sodium lighting for all outdoor light fixtures.
- Goal ER-9**      Enhanced perceived character and quality of the City of Oxnard.
- ER-9.3**      **Residential Street Lighting.** Provide residential street lighting that is appropriate in appearance, scale, and intensity for residential use.
- ER-9.4**      **Human Scale Development.** Ensure that all new development emphasizes a human, pedestrian scale and minimizes its effect on the area’s sensitive visual resources.
- Goal ER-10**      Enhanced landscape quality with an emphasis on landscape practices, management and plant species that are appropriate to Oxnard and its coastal climate.
- ER-10.1**      **Promote use of Native and Water Wise Plants.** Promote the development of a native, drought-tolerant landscape character throughout the City that re-enforces a unified and cohesive landscape character and discourage plants that are invasive or problematic in other ways as determined by the City’s landscape architect.

The Oxnard Municipal Code (OMC) contains regulations governing the physical appearance of development within the City.



### 3.1.2 Impact Analysis

#### 3.1.2.1 Methodology

The visual impact a project may have is qualified through the examinations of the following factors: (1) the type of visual change that will result from the project; (2) the degree to which a project's visual characteristics or elements differ from the same visual elements established in the existing landscape; 3) the project's apparent size relative to other visible landscape features; (4) the degree to which a project's features change or block views of scenic resources, and, (5) the degree to which a project adds new sources of light or glare. Landscapes with similar characteristics to a proposed project's features indicate a landscape more capable of accepting those project characteristics than a landscape where those elements are absent. This analysis examines the existing visual character of the project Site and surrounding area against the proposed project, analyzing the nature of the anticipated change.

#### 3.1.2.2 Significance Thresholds

The thresholds for aesthetic resource impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project have a substantial adverse effect on a scenic vista?*
- *Would the project, in non-urbanized areas substantially degrade the existing visual character or quality of public views of the Site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*
- *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

#### 3.1.2.3 Project Impacts

***Would the project have a substantial adverse effect on a scenic vista?***

The scenic route portions of Rose Avenue are located to the west of the project Site. The proposed project does not involve development on the Oxnard-Camarillo Greenbelt or to the Maulhardt Property adjacent to the project Site to the west, and therefore will not directly damage these scenic resources. Views of the Los Padres Mountains from the scenic route portion of Rose Avenue would remain unobstructed. Windrow trees are located on the east side of Rose Avenue between Camino del Sol and Cesar Chavez Drive.

Views of the existing agricultural uses on the project Site would primarily be from travelers adjacent to the project Site on Rose Avenue and Camino del Sol, residents in the homes surrounding the Site, and the adjacent Rio Rosales Elementary School. Travelers are short duration views which are currently partially obstructed by the existing windrow trees along Rose Avenue. The project would result in a reduction of the agricultural land which is currently part of the Maulhardt Property. The replacement of agricultural land with school uses may appear inharmonious with the ranch portions of the Maulhardt Property to remain. However, the entire area surrounding the Maulhardt Property is built up and modern. Furthermore, the proposed project would not block the view of the ranch portions of the Maulhardt Property to remain from travelers along the adjacent routes. The proposed project would block views of some ranch portions of the Maulhardt Property to remain from residents to the north and east and from the adjacent Rio Rosales Elementary School; however, existing views of the ranch buildings are currently obstructed by the existing mature trees and orchards surrounding the ranch buildings. Cumulative indirect visual impacts of the project, which have the potential to visually alter the characteristics of the historic ranch buildings and diminish their integrity, will require mitigation. Provenience Group, Inc. (PGI) recommends mitigation that will entail planting a thick row of tall trees and bushes along the east and north sides of the existing historic buildings present on the Maulhardt Property to visually obscure the school complex from the historic ranch buildings. The

mitigation associated with indirect impacts to historic resources is further discussed within Section 3.5, *Cultural and Tribal Cultural Resources*.

The project Site would be developed with school uses with implementation of the proposed project. While this would be a visual change, it would not be a significant impact since the proposed project is located in an area planned for future development in the City of Oxnard General Plan and travelers would be coming from similar developed areas. Other viewers in the area include residents in the homes surrounding the project Site, however, these views are often obstructed by the existing windrow trees, street trees, and other vegetation and/or walls. In addition, the proposed project will be designed to be consistent with the community character goals and policies of the City of Oxnard General Plan designed to minimize impacts to scenic resources adjacent to scenic routes. Specifically, the project will be designed to be in compliance with the 2030 General Plan Goal CD-9.4 View Corridor Preservation. This will include a 30-foot landscaped setback from the public right-of-way on Rose Avenue.

The proposed project includes roadway improvements to Rose Avenue that would require removing the mature existing windrow trees found on the east side of Rose Avenue as shown in Figures 3-1 and 3-2. City of Oxnard 2030 General Plan Goals and Policies include the protecting and enhancing scenic resources including windrows. Removal of these trees would result in the loss of a significant scenic resource, resulting in a significant impact. Implementation of Mitigation Measure AES-1 reflects the East Village Phase III Annexation EIR and the Northeast Community Specific Plan guidelines designed to minimize this impact. This would include use of mature existing trees where feasible and replacement criteria when existing mature tree removal is necessary. While this measure will reduce the impact, the loss of the windrow trees would remain a significant and unavoidable impact.

***Would the project, in non-urbanized areas substantially degrade the existing visual character or quality of public views of the Site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

Within the immediate project vicinity, the area can be characterized as urban with a mix of residential, school, park, commercial, and agricultural uses. Implementation for the proposed project would change the character of the project Site from agricultural to developed with school uses, resulting in a developed character and a higher intensity of activity at the project Site. Construction and occupation of the proposed project would change the visual character of the Site.

Visual impacts would result from temporary construction activities, including the presence of construction equipment, materials, and workers, at the project Site, and along Rose Avenue and Camino del Sol. Vehicles such as automobiles, pickup trucks, and dump trucks would be visible. Heavy equipment such as backhoes, graders, and excavators and workers would be visible during Site clearing, grading, construction, and Site cleanup. Construction equipment and activities would be seen by various viewers in proximity to the project Site, including travelers on Rose Avenue and Camino del Sol. Other viewers in the area include residents in the homes surrounding the project Site, however, these views are often obstructed by the existing windrow trees found on the east side of Rose Avenue, street trees on the west side of Rose Avenue and the south side of Camino del Sol, as shown in Figure 3-3 and Figure 3-4, and other vegetation and/or walls as shown in Figure 3-5. Construction activities would be temporary and short-term and thus would have minimal effect on aesthetics and visual quality, resulting in a less than significant impact, and no mitigation measures are required.

Development of the project Site would change the visual character of the project Site by introducing new buildings and structures to the Site in comparison to existing conditions. The buildings will be one- to two-stories in height, in keeping with the existing characteristics of the adjacent surrounding residential neighborhood. The project will be bordered by landscaping. The incorporation of landscaping would result in these features being the most visible elements along public street frontages. The visual characteristics of the proposed project would be consistent with the developed areas surrounding the project Site. The project would be consistent with the visual character of future development anticipated under the City of Oxnard General Plan for the project Site area. As

shown in Figure 4-2 of the City of Oxnard General Plan, *Potential Public School Locations*, the project Site was considered a possible location for a public school. The project would represent the continuation of existing City-wide land use patterns and proposed new development on land used for agricultural uses (City of Oxnard 2011a).

The ranch portions of the Maulhardt Property to remain, which include a residence and agricultural buildings, are not located on the project Site, and the visual character of the farmstead would not be changed as part of the proposed project. The project would change the existing agricultural character of the project Site, which would contrast with the density and style of the buildings found on the farmstead. This change to the project's visual characteristics, however, would represent a built character that has already been contemplated for this area and is found in the surrounding development. Therefore, these changes to the project Site's visual character and quality would be less than significant, and no mitigation measures would be required.

As discussed, the proposed project includes roadway improvements to Rose Avenue that would require removing the mature existing windrow trees. Removal of these trees would result in the loss of a significant scenic resource which contributes to the visual character of the project Site. Removal of the windrow trees would result in a significant impact. Implementation of Mitigation Measure AES-1 reflects the Northeast Community Specific Plan guidelines designed to minimize this impact. This would include use of mature existing trees where feasible and replacement criteria when existing mature tree removal is necessary. While this measure will reduce the impact, the loss of the windrow trees would remain a significant and unavoidable impact.





**View of Rose Avenue Street Trees  
Looking North from Site Western Border**



5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

JOB NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38846	7/31/2019	BURSON		<b>3-3</b>





**View of Camino Del Sol Street Trees  
Looking East from Site Southern Border**



**TETRA TECH**

5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

JOB NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38846	7/31/2019	BURSON		<b>3-4</b>





**View of Wall on Site Eastern Border  
Looking North from Site Southern Border**



5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

JOB NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38846	7/31/2019	BURSON		<b>3-5</b>

***Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?***

While the surrounding area is an urbanized area that contains a variety of artificial lighting sources, there is not permanent the lighting on the project Site. As such, the proposed project could represent a new source of light or glare which could potentially impact nighttime views in the area.

The proposed project would install street lighting on the proposed access road from Camillo del Sol. The proposed project will include exterior lighting around the buildings and for walkways and parking as needed for adequate safety and security at night. It is anticipated that the school would be used in the evening for periodic school activities. In addition, lighted playfields are proposed for the stadium and varsity baseball and softball fields. A photometric analysis was conducted on the proposed playfield lighting by the project lighting system designer, Musco Sports Lighting, LLC (Musco 2019). See Appendix B for a copy of the report.

According to the International Commission on Illumination (CIE), light trespass<sup>2</sup> varies according to surrounding environmental characteristics. Areas that are more rural in character, and therefore have few existing artificial sources of light, are more susceptible to impacts resulting from the installation of new artificial lighting sources. In contrast, urbanized areas are characterized by a large number of existing artificial lighting sources and are thus less susceptible to adverse effects associated with new artificial lighting sources.

In order to determine appropriate lighting standards that are reflective of the existing lighting conditions, land uses are typically categorized into one of four environmental zones. The project Site and surrounding area can be characterized as an area of medium ambient brightness (E3 environmental zone).

Based on these environmental zones, CIE has established recommendations for limiting light trespass onto adjacent properties. The recommendations established by CIE are summarized in Table 3-1.

**Table 3-1.** Obtrusive Light Limitations for Exterior Lighting Installations

Environmental Zone	Light Trespass Illuminance			
	Pre-Curfew (Dusk – 11:00 p.m.)		Post Curfew (11:00 p.m. – 6:00 a.m.)	
E1 – Natural	0.2 fc	2,500 cd	0.1 fc	500 cd
E2 – Rural	0.5 fc	7,500 cd	0.1 fc	500 cd
<b>E3 – Suburban</b>	<b>0.9 fc</b>	<b>10,000 cd</b>	<b>0.2 fc</b>	<b>1,000 cd</b>
E4 – Urban	2.3 fc	25,000 cd	0.5 fc	2,500 cd

Notes:

fc footcandles

cd candelas

Source: CIE (2003)

<sup>2</sup> Light trespass (also known as obtrusive light or spill light) is the condition where poorly shielded or poorly aimed light fixtures cast light onto areas where it is unwanted or not needed.



In this setting, light trespass impacts would be considered potentially significant if illuminance<sup>3</sup> produced by the project would impact sensitive receptors with lighting levels that exceed 0.9 fc during pre-curfew hours (before 11:00 p.m.) and 0.2 fc during the post-curfew hours.

The new sports lighting associated with the proposed project would be used to illuminate the activities of the stadium and varsity baseball and softball fields that may occur during non-daylight hours. There is the potential for the fields to host evening events on a regular basis, including routine practices, games, and/or community events. Based on typical operational characteristics at OUHSD high schools, it is anticipated that field lighting would be completely extinguished by approximately 10:30 p.m. at the latest. In no case would the artificial lighting elements for the field be used between 11:00 p.m. and dawn.

The photometric analysis (see Appendix B) includes photometric modeling showing projected levels of at the property line for the proposed lighting elements. Light sensitive receptors that have the potential to be significantly impacted by project lighting elements include residences, including those closest to the project Site to the east.

It is important to note that the modeled illumination levels do not account for reductions in lighting intensity caused by intervening structures, topography, and/or landscaping. However, the lighting levels do account for distance; specifically, as one approaches the nearby residences and the distance from the proposed lighting standards increases, lighting intensity would decrease at a rate of approximately 75% for each doubling of distance. Additionally, when two lighting sources are combined, the resulting illuminance only significantly increases if the individual lighting sources have similar lighting intensity at the point of observation when viewed individually.

The lighting levels from the proposed project at the property line range from 0.00 to 0.30 vertical footcandles and from 0.00 to 0.16 horizontal footcandles. The maximum values measured would occur on the west side of the project Site. As shown, these light levels do not exceed the threshold of 0.9 footcandle. The operation of the proposed lighting system would not result in significant adverse impacts related to light trespass. In urbanized locations the most common adverse effect of light trespass is disruption of sleep. Although the proposed project would create spill light that would result in light trespass during pre-curfew hours, lighting would be extinguished by 10:30 p.m. at the latest. Furthermore, the nearby residential areas are located in an area of medium ambient brightness and the small increase in light trespass is considered a less than significant impact.

In the event that the proposed lighting system were in operation during post-curfew hours (11:00 p.m.–7:00 a.m.), light trespass levels would be expected to exceed the threshold of significance; however, as described above, lighting elements would be extinguished by 10:30 p.m. at the latest. Because lighting elements would be extinguished by 10:30 p.m. at the latest, the potential for sleep disturbance would be avoided and impacts during post-curfew hours would be less than significant.

Discomfort glare is typically measured in terms of candelas, which is a unit of measurement based on luminous power per unit solid angle emitted by a point light source in a particular direction. The degree of discomfort glare decreases the further that a viewer is located from a light source, due to the dispersion of light across distance. The expected light intensity ranges from 4 at the northeast property edge to a maximum of 7,090 candelas at the western property edge. As shown, these levels do not exceed the threshold of 10,000 candelas. Therefore, glare from the project would be less than significant.

All lighting and materials used within the proposed project will be efficient and consistent with the lighting principles contained in the Community Design Element of the City of Oxnard General Plan (City of Oxnard 2011a) and the Oxnard Municipal Code (City of Oxnard 2017a), that require that all outdoor lights be designed, located, and arranged so as to reflect the light away from adjoining properties or streets. Campus lights will be shielded and directed downward to the extent feasible to minimize glare for pedestrians and drivers and to minimize spillover light.

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<sup>3</sup> Measured in footcandles, illuminance is the intensity of light falling on a surface.

The landscaping buffers surrounding all the parking lots will also minimize and/or block campus lighting and any headlights from vehicles traveling on the project Site. The exterior finish of the proposed buildings would not include any highly reflective surfaces aside from standard glass windows.

The proposed project would introduce new lighting to the Site. However, the lighting for the proposed project will be consistent with the City of Oxnard General Plan (City of Oxnard 2011) and the Oxnard Municipal Code requirements, and the additional light created by the project would not exceed obtrusive lighting thresholds; therefore, the project would not significantly alter the nighttime character of the area. Impacts resulting from light/glare would be less than significant, and no mitigation measures are required.

#### **3.1.2.4 Cumulative Impacts**

The development of the proposed project with non-agricultural uses was contemplated for this area in the City of Oxnard General Plan. The City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) evaluated the potential environmental impacts of buildout of the 2030 General Plan, including the project area. The 2030 General Plan Program EIR found that, while this development would have impacts related to scenic routes, visual character, and light and glare, these impacts would be less than significant and would not require mitigation. As the proposed project would be consistent with development contemplated for this area in the City of Oxnard General Plan, the proposed project's incremental contribution to impacts associated with visual quality and character would be would be less than significant with no additional mitigation.

#### **3.1.2.5 Mitigation Measures**

**AES-1:** Removal of windrow trees shall be subject to the following requirements:

- A certified arborist report shall be required, which contains a description of the health of each tree.
- A tree valuation report shall be provided for each tree (as prepared by a certified arborist) based upon, *Valuation of Landscape Trees, Shrubs, and Other Plants* (an official publication by the International Society of Arborists).
- Tree rows authorized for removal shall be replaced and/or additional landscape enhancement shall be provided to the same dollar value as the trees designated to be removed. This is in addition to the minimum landscaping required per the City's Landscape Standards. The species to be replanted shall be approved by the Oxnard Parks Division.

#### **3.1.2.6 Level of Impact After Mitigation**

Impacts related to the removal of windrow trees remain significant and unavoidable.

## 3.2 AGRICULTURE AND FORESTRY RESOURCES

This section describes the proposed project's potential to affect important agricultural resources in the local area. As noted in the Initial Study (Appendix A), potential project impacts associated with existing zoning for agricultural use or a Williamson Act contract, existing zoning for forest or timber land, loss or conversion of forest land, and other changes resulting in loss of farmland or forest land to other uses were found to be less than significant and are not discussed further in the EIR.

### 3.2.1 Environmental Setting

#### 3.2.1.1 Existing Conditions

Ventura County is recognized as one of the principal agricultural counties in the State of California. Agriculture generates a substantial number of jobs ranging from crop production to processing, shipping and other related industries. However, the 2030 General Plan EIR concluded that the ultimate development of land, consistent with the land use designations of the 2030 General Plan, would result in the conversion of 2,215 acres of Important Farmlands to other uses. This anticipated conversion of land was identified as a significant impact. Several aspects of the 2030 General Plan Goals and Policies were identified as contributing to the preservation of agricultural lands. Even with implementation of these goals and policies, however, the 2030 General Plan EIR concluded that the conversion of important farmland to non-agricultural uses would still be considered a significant and unmitigable impact (City of Oxnard 2017a).

The project Site is made up of Important Farmlands which were identified in the 2030 General Plan as lands to be converted to other uses. This impact was addressed in the 2030 General Plan EIR, as well as in EIRs for development of the project Site, including the NECSP EIR and East Village Phase III EIR (City of Oxnard 2011a, Takata Associates/Castañeda and Associates n.d., City of Oxnard 2012). The Site is currently used for the cultivation of strawberries. Historical aerial photographs, Google Earth images, and information from the land owners indicate that the project Site has been used for cultivation of row crops from as early as 1869 to the present. The Site was under a Williamson Act contract until February 29, 2012 (see Section 3.2.1.2 for an explanation of Important Farmlands, including lands subject to Williamson Act contracts).

The project Site is located within an urban environment surrounded by agricultural land to the north; single family residential land and Rio Rosales Elementary School to the east; single and multi-family residential and commercial land to the south; and single-family residential land to the west.

#### 3.2.1.2 Regulatory Setting

##### Federal

No federal policies or regulations pertaining to agriculture are applicable to the proposed project.

##### State

The California Department of Conservation prepares maps of important farmland throughout the state, based on categories of agricultural land defined by the U.S. Department of Agriculture land inventory and monitoring criteria, and regularly reports on the conversion of farmland to other uses (pursuant to Government Code Section 65570). The categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance designations are often referred to collectively as "Important Farmlands". The General Plan Background Report (City of Oxnard 2006, Table 5-7) indicates that there are approximately 23,000 acres of land meeting this definition within the Oxnard Planning Area (City of Oxnard 2017a). One category of Important Farmlands is those subject to Williamson Act contracts. The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use.



## Local

### ***Save Open Space and Agricultural Resources***

Beginning in 1995, residents within Ventura County began enacting initiatives that generally require voter approval for expansive outward growth with the goal of preserving agricultural and open space resources. Oxnard adopted the Save Open Space and Agricultural Resources (SOAR) Ordinance on November 3, 1998 that created a City Urban Restriction Boundary (CURB) around the City until December 31, 2020 (City of Oxnard 2011a). The project Site is within the CURB boundary, meaning that conversion of agricultural land is permitted.

### ***Agricultural Greenbelt Agreements***

The Oxnard-Camarillo Greenbelt and the Oxnard-Ventura Greenbelt largely define the City's north, east, and western boundaries. These areas are intended for long-term agricultural use and generally cannot convert to urban development without voter approval (City of Oxnard 2011a).

### ***City of Oxnard 2030 General Plan Goals and Policies***

The City of Oxnard 2030 General Plan Goals and Policies for agriculture most relevant to the proposed project are as follows:

- Goal CD-6**      **Compatible Agriculture.** Continued agriculture use within the Planning Area, compatible with the community's vision.
- CD-6.1**        **Agricultural Buffers.** Require that agricultural land uses designated for long-term protection and production be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, fencing, berming, and windrows.
- Goal ER-12**    **Agriculture and Soil Resources.** Viable agricultural industry, maintained and enhanced soil resources, reduced erosion, and improved agricultural productivity.
- ER-12.5**       **Soil Conservation and Transfer.** Encourage the conservation of agricultural soils by requiring, if feasible and warranted by expert opinion, the transfer of topsoil from agricultural land being developed for urban uses.
- ER-12.8**       **Greenbelt Policies.** Continue the commitment of maintaining the Oxnard-Camarillo and Oxnard-Ventura Greenbelts and their associated policies.
- ER-12.11**      **Urban/Agricultural Buffer Zones.** Ensure adequate buffers between residential and agricultural uses, such as open space, recreational facilities, utility easements, windrows, and parking areas. Adequate fencing should be provided around agricultural areas to prevent vandalism.

## 3.2.2 Impact Analysis

### 3.2.2.1 Methodology

The City of Oxnard CEQA Guidelines were used to determine potential impacts to agricultural resources. A project may have direct and/or indirect effects related to the conversion of agricultural land to other uses. Direct effects would occur if the project would occur on existing farmland and would result in the development of a different use such as a residential neighborhood or shopping center. The identification of important farmland should be based on City mapping or on mapping available from the California Department of Conservation.

The determination of whether a specific project would have a significant and unavoidable impact relative to the direct conversion of important farmland requires the consideration of factors unique to the specific project. For most projects (those consistent with the General Plan land use designations) no new analysis or discussion will be necessary.

Indirect effects that may lead to conversion of nearby farmlands to developed uses are usually caused by land use compatibility issues. Policies from the 2030 General Plan intended to reduce such incompatibility include CD-6.1 and ER-12.11, related to providing adequate agricultural buffer areas.

### 3.2.2.2 Significance Thresholds

The thresholds for agricultural resources impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

### 3.2.2.3 Project Impacts

***Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

The City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) accounted for the conversion of up to 2,215 acres of important farmland (defined as Prime Farmland and Farmland of Statewide Importance) including the project Site to non-agricultural use and determined the impact to be significant and unavoidable. The entire Maulhardt Property was identified as either Prime Farmland or Farmland of Statewide Importance in PEIR Figure 5-1, Important farmland Impacts. No feasible mitigation measures were available to reduce the impact to a less than significant level (City of Oxnard 2009).

The City certified the 2030 General Plan Program EIR on October 11, 2011 that considered the possible environmental impacts of buildout to 2030: adding approximately 40,000 people to the City's population, development of all remaining vacant land within the Oxnard CURB Line including the project Site. The conversion of the project Site to a developed use was addressed by the 2030 General Plan Final EIR and found to be a significant City-wide adverse impact for which an overriding consideration was made (City of Oxnard 2012). According to the East Village Phase III Annexation EIR, the City has also determined that conversion of agricultural land is a project-level impact and required a mitigation measure (AG1) to offer the topsoil for removal to another farm operation, if feasible, as a partial mitigation for the loss of prime farmland impact (City of Oxnard 2012).

OUHSD proposes to change the NECSP designations for the project Site to School use. The District is coordinating with the City relative to conformance of its Site use with the existing General Plan and zoning ordinances. Even though the land use is proposed for a change to accommodate the school, the buildout of the Site with a non-agricultural use was previously accounted for in the 2030 General Plan and identified in the East Village Phase III Annexation EIR. While the proposed project would be a different development scenario than previously evaluated, it would nonetheless also convert the Site to non-agricultural use. No new or increased impact related to conversion of important farmland would result given the location of the project Site within a developed urban environment. Mitigation Measure AG-1 is provided as partial mitigation measure for the loss of important farmland. Nonetheless, conversion of agricultural land at the project level would remain a significant and unavoidable impact.

Because the School would likely be built before the rest of the Maulhardt Property, it may be necessary to ensure that continuing agricultural uses on the remainder of the property be buffered from the school to ensure that no indirect impacts to students and staff at the school occur.

### 3.2.2.4 Cumulative Impacts

Through the development of the proposed project and other development contemplated for this area in the City of Oxnard General Plan, the character of the project area would increasingly change from agricultural to urban. The City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) evaluated the potential environmental

impacts of buildout of the 2030 General Plan, including the project area. The 2030 General Plan Program EIR found that the conversion of agricultural land to urban uses is a significant and unavoidable impact. This was analyzed again in the NECSP EIR and East Village Phase III Annexation EIR with the same conclusion. However, as the proposed project would be consistent with the residential and other development in this area in the City of Oxnard General Plan, the proposed project's contribution to impacts associated with agricultural resources would not be any greater than already analyzed.

### **3.2.2.5 Mitigation Measures**

**AG-1:** In accordance with the mitigation described in the 2030 General Plan EIR and East Village Phase III EIR for the loss of prime agricultural soils, the OUHSD shall:

- Offer at cost the top 12 inches of the Prime Farmland soils for relocation to a farm site or farm sites that have lower quality soils. The cost will include suitable replacement soil, if needed for Site improvements.

### **3.2.2.6 Level of Impact After Mitigation**

Conversion of agricultural land at the project level would remain a significant and unavoidable impact.

### 3.3 AIR QUALITY

Air quality in a given location is defined by the concentration of various pollutants in the atmosphere. By comparing a pollutant concentration in the atmosphere to federal and/or state ambient air quality standards, the impact of its presence can be determined. This section evaluates the potential air quality impacts from construction and operation of the proposed project.

#### 3.3.1 Environmental Setting

All of California is divided into air basins, which are served by either county air pollution control districts or multi-county air quality management districts. Air basins are delineated based on their potential for trapping air pollutants due to natural barriers such as mountains. Pollutants tend to stagnate unless dispersed into other areas by strong enough prevailing winds.

The proposed project is located within the City of Oxnard in the South-Central Coast Air Basin (SCC), which consists of Ventura County, Santa Barbara County, and San Luis Obispo County. The Ventura County Air Pollution Control District (VCAPCD) is the agency responsible for attaining federal and state clean air standards within Ventura County. The proposed project is, therefore, within the jurisdiction of the VCAPCD, which oversees the welfare of air quality of Ventura County and promotes its improvement through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and support and implementation of measures to reduce emissions from motor vehicles.

Pollutant concentrations within Ventura County are assessed relative to both National Ambient Air Quality standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

To determine attainment of the NAAQS and CAAQS, VCAPCD monitors air quality through a network of air monitoring stations within its boundaries. Data collected at the monitoring stations is compiled and assessed in an effort to track air quality conditions and support attainment efforts.

##### 3.3.1.1 Existing Conditions

As of June 30, 2019, the United States Environmental Protection Agency (U.S. EPA) listed the Ventura County as attainment for all standards except the federal 8-Hour O<sub>3</sub> (U.S. EPA 2019). Similarly, as of June 2017, CARB lists the Ventura County as attainment for all pollutants except the 8-Hour O<sub>3</sub> and PM<sub>10</sub> standards (CARB 2017). A summary of attainment for Ventura County is outlined in Table 3-2.

**Table 3-2.** Attainment Status of Ventura County

Pollutant	<sup>1</sup> National Attainment Status	<sup>2</sup> State Attainment Status
1-Hour Ozone	Not applicable	Nonattainment
8-Hour Ozone	Nonattainment – Serious	Nonattainment
PM <sub>2.5</sub>	Unclassified/Attainment	Attainment
PM <sub>10</sub>	Unclassified	Nonattainment
Carbon Monoxide	Unclassified/Attainment	Attainment
Nitrogen Dioxide	Unclassified/Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Unclassified/Attainment	Attainment

Pollutant	<sup>1</sup> National Attainment Status	<sup>2</sup> State Attainment Status
Sulfates	No standard	Attainment
Hydrogen Sulfide	No standard	Unclassified
Visibility Reducing Particles	No standard	Unclassified

Source: 1 U.S. Environmental Protection Agency 2019.

2 California Air Resources Board 2017.

### 3.3.1.2 Regulatory Setting

#### Federal

The U.S. EPA classifies the air quality within an area with regard to its attainment of federal primary and secondary NAAQS. Primary standards prescribe the maximum permissible concentration in the ambient air and are required to protect public health. Secondary standards specify levels of air quality required to protect public welfare, including materials, soils, vegetation, and wildlife, from any known or anticipated adverse effects (U.S. EPA 2017a). NAAQS are established for six pollutants (known as criteria pollutants): ozone (O<sub>3</sub>), particle pollution (i.e., respirable particulate matter equal to and less than 10 microns in diameter [PM<sub>10</sub>] and respirable particulate matter equal to and less than 2.5 microns in diameter [PM<sub>2.5</sub>]), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and lead (Pb). A summary of NAAQS is provided in Table 3-3. Under the Clean Air Act Amendments of 1990 (CAAA) directive, attainment and maintenance of NAAQS is required.

The following narratives provide a brief description of effects of criteria air pollutants.

Ozone at the ground level is not emitted directly into the air. Instead, it is formed from a reaction between oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds in the presence of sunlight. NO<sub>x</sub> is produced from the combustion of fossil fuels (e.g., diesel, gasoline, and natural gas) through various processes including vehicles, furnaces, and boilers. VOCs are emitted from solvent and/or solvent based products such as architectural coatings and degreasers. Ozone is harmful to health particularly in young children, the elderly and populations with respiratory conditions such as asthma.

Particulate matter are a mixture of solid particles and liquid droplets found in the air. Depending on their size, particulate matter (PM) are classified as PM<sub>2.5</sub> and PM<sub>10</sub>. Sources of PM include construction sites, combustion gases, smoke, and soot. PM<sub>2.5</sub> is primarily responsible for visibility reduction in the air. PM<sub>2.5</sub> relevant health effects include exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease, decline in pulmonary function or growth in children, and increased risk of premature death. PM<sub>10</sub> can enter the lungs and blood stream causing also adverse health effects.

Carbon monoxide is a colorless odorless gas that results from combustion sources. If inhaled in large amounts, it can cause serious health problems, including dizziness, confusion, unconsciousness, and death.

Nitrogen dioxide is the primary member and used as the indicator for of the family of NO<sub>x</sub>. NO<sub>2</sub> results from the burning of fuel in a variety of sources including cars, trucks and buses, power plants, and off-road equipment. NO<sub>2</sub> can react with other pollutants to form O<sub>3</sub> and PM. NO<sub>2</sub> can primarily affect the respiratory system in humans. Short-term exposure to high concentrations of NO<sub>2</sub> can aggravate existing respiratory conditions such as asthma. Long-term exposure to NO<sub>2</sub> can result in the development of respiratory diseases such as asthma.

Sulfur dioxide is the primary member of and used as the indicator for the family oxides of sulfur (SO<sub>x</sub>). SO<sub>2</sub> results from combustion of fuels primary at power plants and other industrial facilities. SO<sub>2</sub> reacts with other pollutants to form fine PM. SO<sub>2</sub> affects the respiratory system in humans, and at high concentrations, it can damage trees and crops.



Major sources of lead in the air include ore and metals processing and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. Areas near lead smelters have the highest air concentrations of lead. Lead health effects include learning disabilities, impairment of blood formation, and nerve conduction.

Pursuant to U.S. EPA guidelines, an area with air quality better than the NAAQS for a specific pollutant is designated as being in attainment for that pollutant. Any area not meeting the NAAQS for a specific pollutant is classified as nonattainment for that particular pollutant. Where there is a lack of data for the U.S. EPA to make a determination regarding attainment or nonattainment, the area is designated as unclassified and is treated as an attainment area until proven otherwise. Areas that were once designated as nonattainment but are currently meeting and maintaining the NAAQS are designated as maintenance areas. States with nonattainment or maintenance areas are required to prepare plans, known as State Implementation Plans (SIPs), stating how they will attain or maintain NAAQS. SIPs are a compilation of new and previously approved plans, programs, district rules, state regulations and federal controls. States and local air quality management agencies prepare SIPs for approval by the U.S. EPA.

### State

At the state level, the California Air Resource Board (CARB) has also adopted air quality standards for California, known as the CAAQS pursuant to the California Clean Air Act (CCAA). The CAAQS are generally more stringent than the NAAQS and include air quality standards for all criteria pollutants listed under NAAQS, plus sulfates ( $\text{SO}_4$ ), hydrogen sulfide ( $\text{H}_2\text{S}$ ), vinyl chloride, and visibility-reducing particulate matter. The CCAA established California's air quality goals, planning mechanisms, regulatory strategies, and standards of progress aimed at meeting and/or exceeding CCAA requirements for air quality. The CCAA requires attainment of CAAQS for criteria pollutants by the earliest practicable date. A summary of CAAQS is presented in Table 3-3.

**Table 3-3.** National and State Ambient Air Quality Standards

Pollutant	Averaging Time	California	National Standards <sup>2</sup>	
		Concentration <sup>3</sup>	Primary <sup>3,4</sup>	Secondary <sup>3,5</sup>
Ozone ( $\text{O}_3$ ) <sup>6</sup>	1 Hour	0.09 ppm (180 $\mu\text{g}/\text{m}^3$ )	—	Same as Primary Standard
	8 Hour	0.070 ppm (137 $\mu\text{g}/\text{m}^3$ )	0.070 ppm (137 $\mu\text{g}/\text{m}^3$ )	
Particulate Matter ( $\text{PM}_{10}$ ) <sup>7</sup>	24 Hour	50 $\mu\text{g}/\text{m}^3$	150 $\mu\text{g}/\text{m}^3$	Same as Primary Standard
	Annual Arithmetic Mean	20 $\mu\text{g}/\text{m}^3$	—	
Fine Particulate Matter ( $\text{PM}_{2.5}$ ) <sup>7</sup>	24 Hour	—	35 $\mu\text{g}/\text{m}^3$	Same as Primary Standard
	Annual Arithmetic Mean	12 $\mu\text{g}/\text{m}^3$	12.0 $\mu\text{g}/\text{m}^3$	15 $\mu\text{g}/\text{m}^3$
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/ $\text{m}^3$ )	35 ppm (40 mg/ $\text{m}^3$ )	—
	8 Hour	9.0 ppm (10 mg/ $\text{m}^3$ )	9 ppm (10 mg/ $\text{m}^3$ )	—
Nitrogen Dioxide ( $\text{NO}_2$ ) <sup>8</sup>	1 Hour	0.18 ppm (339 $\mu\text{g}/\text{m}^3$ )	100 ppb (188	—
	Annual Arithmetic Mean	0.030 ppm (57 $\mu\text{g}/\text{m}^3$ )	0.053 ppm (100 $\mu\text{g}/\text{m}^3$ )	Same as Primary Standard

Pollutant	Averaging Time	California	National Standards <sup>2</sup>	
		Concentration <sup>3</sup>	Primary <sup>3,4</sup>	Secondary <sup>3,5</sup>
Sulfur Dioxide (SO <sub>2</sub> ) <sup>9</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	75 ppb (196	—
	3 Hour	—	—	0.5 ppm (1300 µg/m <sup>3</sup> )
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )	0.14 ppm (for certain areas) <sup>8</sup>	—
	Annual Arithmetic Mean	—	0.030 ppm (for certain areas) <sup>8</sup>	—
Lead <sup>10,11</sup>	30-Day Average	1.5 µg/m <sup>3</sup>	—	—
	Calendar Quarter	—	1.5 µg/m <sup>3</sup> (for certain areas) <sup>10</sup>	Same as Primary Standard
	Rolling 3-Month Average	—	0.15 µg/m <sup>3</sup>	
Visibility Reducing Particles <sup>12</sup>	8 Hour	See footnote 11	No National Standards	
Sulfates	24 Hour	25 µg/m <sup>3</sup>	No National Standards	
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	No National Standards	
Vinyl Chloride <sup>10</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	No National Standards	

**Sources:**

- Table extracted from <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf> on February 2017 with information dated 4 May 2016 (California Air Resource Board 2016).

**Notes:**

- California standards for ozone, carbon monoxide, sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded.
- National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms per cubic meter (µg/m<sup>3</sup>) is equal to or less than one. For PM<sub>2.5</sub>, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
- Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 Torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 Torr; ppm in this table refers to parts per million (ppm) by volume, or micromoles of pollutant per mole of gas.
- National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

7. On 14 December 2012, the national annual PM<sub>2.5</sub> primary standard was lowered from 15 µg /m<sup>3</sup> to 12.0 µg/m<sup>3</sup>. The existing national 24-hour PM<sub>2.5</sub> standards (primary and secondary) were retained at 35 µg /m<sup>3</sup>, as was the annual secondary standard of 15 µg /m<sup>3</sup>. The existing 24-hour PM<sub>10</sub> standards (primary and secondary) of 150 µg /m<sup>3</sup> also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
  8. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
  9. On 2 June 2010, a new 1-hour SO<sub>2</sub> standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO<sub>2</sub> national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
  10. The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
  11. The national standard for lead was revised on 15 October 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg /m<sup>3</sup> as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
  12. In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.
- m<sup>3</sup>      cubic meter  
 µg      microgram  
 µg/ m<sup>3</sup>   micrograms per cubic meter  
 mg      milligrams  
 ppb      parts per billion  
 ppm      parts per million

## Local

Operations within the City of Oxnard are subject to various rules and regulations of the VCAPCD. Table 3-4 lists some of the Rules that are applicable to the proposed project.

**Table 3-4.** Applicable VCAPCD Rules

Rule	Title
50	Opacity
51	Nuisance
55	Fugitive Dust
74.2	Architectural Coatings

Rule 50 regulates visible emissions from each single source using the Ringelmann Chart as a point of reference and in accordance with EPA Method 9.

Rule 51 prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Rule 55 requires control measures for fugitive dust from active operations, open storage piles, or disturbed surface areas and prohibits activities that would cause visible dust emissions of 20 percent. The rule also includes provision for mitigating fugitive dust emissions (e.g., watering the Site during grading, properly covering truck beds when hauling soil or other material, installing dust control measures at each vehicle egress from the Site to public paved roads).

Rule 74.2 regulates the VOC content in architectural coating manufactured, distributed and used within the County of Ventura.

Additionally, City of Oxnard General Plan air quality goals and policies relevant to the proposed project are provided in Table 3-5.

**Table 3-5.** Applicable Goals and Policies for the City of Oxnard

SC-3.9	Promote Voluntary Incentive Programs	Promote voluntary participation in incentive programs to increase the use of solar photovoltaic systems in new and existing residential, commercial, institutional and public buildings, including continued participation in the Ventura County Regional Energy Alliance (VCREA).
SC-3.12	Encourage Natural Ventilation	Review and revise applicable planning and building policies and regulations to promote use of natural ventilation in new construction and major additions or remodeling consistent with Oxnard's temperate climate.
SC-4.1	Green Building Code Implementation	Implement the 2010 California Green Building Code as may be amended (CALGREEN) and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.
CD-8.5	Impact Mitigation	Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.
ER-14.4	Emission Control Devices	Require all construction equipment to be maintained and tuned to meet appropriate EPA, CARB, and VCAPCD emissions requirements and when new emission control devices or operational modifications are found to be effective, such devices or operational modifications are required on construction equipment.
ER-14.5	Reducing Construction Impacts During Smog Season	Require that the construction period be lengthened to minimize the number of vehicles and equipment operating at the same time during smog season (May through October).

ER-14.6	Minimizing Dust and Air Emissions through Permitting Requirements	Continue to require mitigation measures as a condition of obtaining building or use permits to minimize dust and air emissions impacts from construction.
ER-14.7	Mitigation Monitoring	Ensure that projects with identified air quality impacts in their respective EIRs are subject to effective mitigation monitoring as required by AB 3180.
ER-14.10	Consultation with Ventura County Air Pollution Control District	Consult with VCAPCD during CEQA review for projects that require air quality impact analysis and ensure that the VCAPCD is on the distribution list for all CEQA documents.
ER-14.12	Use VCAPCD Air Quality Assessment Guidelines	Use the VCAPCD Air Quality Assessment Guidelines and recommended analytical tools for determining and mitigating project air quality impacts and related thresholds of significance for use in environmental documents. The City shall continue to cooperate with the VCAPCD in the review of development proposals.
CD-7.12	Urban Village Collocation with Schools	Promote the collocation of parks with school facilities for the purpose of enhancing available open space and recreation.
CD-7.13	Urban Village Trail and Open Connections	Include trails (pedestrian and bicycle) and open space areas, where feasible within urban village areas. These facilities shall create a network that links urban villages and other neighborhoods to each other.
CD-6.1	Agricultural Buffers	Require that agricultural land uses designated for long-term protection and production be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, fencing, berming, and windrows.

### 3.3.2 Impact Analysis

#### 3.3.2.1 Methodology

Guidance found within the Ventura County Air Quality Assessment Guidelines (Guidelines), the City of Oxnard CEQA Guidelines and various sources referenced throughout this air quality analysis were used in the preparation of this document. A summary of the methodology used for emissions calculations is provided below.

#### Construction and Operational Emissions

Emissions from construction and operation activities were calculated using California Emissions Estimator Model (CalEEMod). CalEEMod is widely accepted to provide a uniform platform to estimate potential emissions resulting from construction and operation activities of land use projects. The model takes user entered data to calculate emissions using preprogramed algorithms. The algorithms are designed to take information such as project size and length; vehicle types, operating hours, and trip lengths; and emissions mitigation criteria to calculate emissions of criteria pollutants and greenhouse gases. Detailed CalEEMod input values and calculated air emission results for the proposed project are included as Appendix C. A summary of the activities from which the CalEEMod report was generated is also provided in Appendix C. Air emissions were compared to significance thresholds established by the VCAPCD to determine project impacts on air quality.



## CO Analysis

The Ventura County Air Quality Assessment Guidelines prescribe a carbon monoxide screening analysis for intersections that are expected to operate at level of service (LOS) E or F. These guidelines recommend use of CALINE4, a line source dispersion model developed by the California Department of Transportation (Caltrans) and designed to predict pollutant concentrations for receptors (e.g., residents, business workers, etc.) within 500 meters. To determine LOS predictions a review of the traffic study prepared for this project (Stantec 2019) was conducted. Per the traffic study, six intersections (intersections 4, 13, 15, 16, 20, and 21) were predicted to operate at either E or F conditions. One of the six intersections (intersection 15) was predicted to operate at LOS E under the cumulative plus project operation. The other five intersections were predicted to operate at LOS E or F conditions under buildout plus project operation. Since buildout plus project operation predicts the most intersections with LOS E or F, and intersection 15 is not predicted to result in LOS E or F at buildout plus project operation, the CO analysis was performed only on the five intersections with LOS E or F at buildout plus project operation.

CALINE4 requires inputs that include magnitude of CO sources (e.g., traffic volumes, CO emission factors from vehicles, and background CO concentrations), site geometry (e.g., roadway and receptor location), and local meteorology (e.g., temperature and wind direction). Traffic volumes were determined from the traffic study. PM Peak Hour traffic volumes represent the worst-case hourly congestion scenario at each of the five intersections and were, therefore, used within CALINE4 to assess CO dispersion. CO emission factors from on-road vehicles were calculated using ENFAC, a CARB computer program used to calculate emission factors for motor vehicles. Ventura County background concentrations of CO, which is required to run CALINE4 have not been measured for some time. Therefore, a background concentration of 2.3 parts per million as documented in the Guidelines were added to CO concentrations calculated using CALINE4.

CALINE4 inputs and results, including emission factors for on-road vehicles determined using EMFACT are included in Appendix C (CO Analysis). CO concentrations were compared against the 1-hour California Standard for CO to determine impacts.

### 3.3.2.2 Significance Thresholds

The following criteria for air quality are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project conflict with or obstruct implementation of the applicable air quality plan?*
- *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area under an applicable federal or state ambient air quality standard?*
- *Would the project expose sensitive receptors to substantial pollutant concentrations?*
- *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

### 3.3.2.3 Project Impacts

#### ***Would the project conflict with or obstruct implementation of the applicable air quality plan?***

The project Site is located in the City of Oxnard.

To pursue SIP requirements and improvement of air quality in Ventura County, the VCAPCD has prepared the 2016 Air Quality Management Plan (AQMP). The AQMP presents a comprehensive list of pollution control strategies aimed at attaining Ventura County's federal 8-hour ozone standard (for which Ventura County is in nonattainment) as required by the CAAA and the VCAPCD's Triennial Assessment and Plan Update required by the California Clean Air Act of 1988. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG) and reflected in

local general plans. Thus, a proposed project that is inconsistent with a local general plan is also inconsistent with the AQMP. A proposed project would be inconsistent with a general plan if it resulted in a land use re-designation, causing a general plan amendment and an increase in population beyond what is budgeted.

The project Site is located within the City of Oxnard and within the Northeast Community Specific Plan. The proposed project Site is adjacent to agricultural land to the North and a fully developed residential development to the west, housing development and an elementary school to the east, and housing and commercial developments to the south. The General Plan land use designations for the project Site include RLM and OS, Urban Village. Buildout of project Site was accounted for in the City's 2030 General Plan which also identified the project Site as a potential school location (Figure 4-2 of the General Plan).

The project Site is designated as a potential public school location in the General Plan. The proposed project would not induce substantial population growth into the area either directly or indirectly. The student population would be part of the existing and projected growth for the City as accounted for in the General Plan. In general, K-12 schools accommodate growth as a result of other land use decisions in the City such as the construction of new homes or the creation of a substantial number of new jobs that encourages new people to move into the area. No housing is proposed as a part of the project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all the additional staff could be hired from the existing qualified applicant pool already residing within or near the District. However, if teachers or other staff are hired outside the District area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the existing local population. The proposed project includes educational facilities that would accommodate existing and projected student enrollment in the District and the requirement for local schools to service the City of Oxnard. The proposed project would not result in population growth above what is forecasted in the 2030 General Plan and in turn the 2016 AQMP. Therefore, the proposed project would not conflict or obstruct implementation of the applicable 2016 AQMP and project impact would be less than significant.

***Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area under an applicable federal or state ambient air quality standard?***

The proposed project would result in significant cumulative impacts if it exceeds daily thresholds of significance established by VCAPCD or if it incurred in an increase of emissions beyond what is planned in the City of Oxnard General Plan.

The proposed project is located within the City of Oxnard, in Ventura County, which is subject to the VCAPCD regulations. Pollutant concentrations within the Ventura County are assessed relative to both the federal and state ambient air quality standards. Ventura County is in attainment for all federal standards except the 8-hour O<sub>3</sub> standard (U.S. EPA 2019) and all state standards except O<sub>3</sub> and PM<sub>10</sub> standards (CARB 2017). The release of various criteria pollutants from both short-term construction and long-term operation related activities for the proposed project are expected. The following sections provide a summary of the emissions analysis conducted for the proposed project.

**Short-term Emissions.** Short-term or construction emissions are typically generated by on-road (e.g., employee vehicles and vendor/delivery and water trucks) and off-road vehicles or equipment (e.g., backhoes, dozers, portable generators, and cranes). Short-term emissions end once the construction phase is complete. The proposed project's construction phase consists of Site preparation; grading; construction of classrooms, physical activities structures (e.g., soccer and baseball fields), and administrative offices; paving; and application of architectural coatings to classrooms and offices. Emissions from the construction phase result primarily from mobile on-road (e.g., workers vehicles, material and equipment delivery trucks, soil haul trucks) and off-road sources (i.e. construction equipment). The construction equipment used for the proposed project would include air compressors, scrapers, cranes, forklift, excavators, pavers, rollers, rubber-tired dozers, generator sets, backhoes, graders, paving equipment and welders. A summary of construction emissions is presented in Table 3-6.

**Table 3-6.** Project Construction Emissions of Criteria Pollutants (lb/day)

Project Phase	CO	VOCs	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions 2020	74.74	4.52	65.90	0.73	10.39	5.48
Construction Emissions 2021	53.96	283.18	45.40	0.13	6.36	2.91
Construction Emissions 2022	31.3	2.45	29.90	0.10	5.37	2.10
Threshold Significance	None	None	None	None	None	None
Significant?	No	No	No	No	No	No

Notes:

- CO carbon monoxide
- NO<sub>x</sub> nitrogen oxides (nitrogen oxide and nitrogen dioxide)
- PM<sub>2.5</sub> particulate matter less than 2.5 microns in diameter
- PM<sub>10</sub> particulate matter less than 10 microns in diameter
- SO<sub>x</sub> sulfur dioxide
- tpy tons per year
- VOC volatile organic compound

VCAPCD does not have significance thresholds for construction emissions due to the fact that construction emissions occur only on a temporary basis and do not contribute to long-term air quality impacts. Thus, emissions resulting from the proposed project would not be expected to have a significant impact on the environment and no mitigation measures would be required. However, the following Mitigation Measure AQ-1 is provided to minimize fugitive dust emissions in compliance with the Oxnard General Plan and VCAPCD and to ensure compliance with VCAPCD Rules and CARB off-road regulations in accordance with VCAPCD recommendations for construction emissions exceeding the county's thresholds of significance of 25 pounds per day for NO<sub>x</sub> and SO<sub>x</sub>. With compliance with Mitigation Measure AQ-1, project impact would be less than significant.

**Long-term Emissions.** Long-term or operational emissions are emissions that result from activities conducted during the operation of a project (e.g., heating, employee commute, student drop-off and pickup, and facility upkeep). Long-term impacts to air quality would be associated with emissions from equipment used during operation of the proposed project (e.g., commercial water heaters, space heaters, and lawn mowers) and from motor vehicles associated with school employees, student drop-off and pick-up, and vendors. Other activities that would contribute emissions during the operation of the proposed project include upkeep of structures (e.g., reapplication of architectural coatings and patching of paved surfaces). Detail input parameters and emissions results are provided in Appendix C. Emissions resulting from operation of the proposed project are summarized in Table 3-7. Emissions resulting from the operation of the proposed project are below the thresholds of significance established by VCAPCD to support attainment of federal standards. Therefore, the proposed project would not be expected to violate any air quality standard or contribute substantially to an existing or projected air quality violation and would have less than significant impact on air quality.

**Table 3-7.** Project Operation Emissions of Criteria Pollutants (lb/day)

Project Phase	CO	VOCs	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Operation Emissions	68.14	13.77	22.77	0.24	22.15	6.09
Threshold of Significance	None	25	25	None	None	None
Significant?	No	No	No	No	No	No

Notes:

- CO carbon monoxide
- lb/day pounds per day
- NO<sub>x</sub> oxides of nitrogen (nitric oxide and nitrogen dioxide)
- PM<sub>10</sub> respirable particulate matter less than 10 microns in diameter
- PM<sub>2.5</sub> respirable particulate matter less than 2.5 microns in diameter
- SO<sub>x</sub> oxides of sulfur (sulfur dioxide and sulfur trioxide)
- VOC volatile organic compounds

As identified in Table 3-7, the proposed project would not violate an air quality standard, nor would it contribute substantially to an existing or projected air quality violation. Therefore, project impact would be less than significant.

Since the proposed project's long-term emissions are less than established thresholds of significance, and its land use is not anticipated to provide for increase population growth above what is forecasted in the General Plan, the proposed project would not result in a cumulative considerable net increase of any criteria pollutant for which the region is non-attainment. Therefore, the proposed project would have less than significant cumulative impacts.

***Would the project expose sensitive receptors to substantial pollutant concentrations?***

The Site is adjacent to agricultural land to the north; single family residential land and Rio Rosales Elementary School to the east; single and multi-family residential and commercial land to the south; and single-family residential land to the west. The proposed project is a public school that qualifies as a sensitive receptor (i.e., a facility serving populations likely to suffer adverse health effects from pollution, such as children and the elderly). The location of the project Site is not expected to expose students to sources of substantial pollutant concentrations (e.g., industrial facilities emitting odorous or hazardous substances). Adjacent agricultural land use is consistent with the Oxnard General Plan and agricultural operations are not expected to expose receptors (e.g., school staff and students to substantial pollutant concentrations). In accordance with Goal CD-6 of the Oxnard General Plan, the proposed project includes buffer between agricultural fields and classrooms in the form of soccer, baseball, softball and football fields as well as tennis courts and parking lots.

During construction, construction activities would generate particulate matter emissions resulting from the combustion of diesel fuel by construction equipment. Construction emissions would be temporary and would cease once the project is constructed and construction activities are completed. The VCAPCD has neither adopted nor recommended methodology for assessing health risk analysis associated with mobile sources at construction sites. The Office of Environmental Health Hazard Assessment (OEHHA), in its Guidance Manual for Preparation of Health Risk Assessments associated with stationary sources, recommends that a 30-year exposure duration be used as the basis for estimating cancer risk at the maximum exposed individual resident in the Hot Spots Program and the 9- and 70- year cancer risk as supplemental information (OEHHA 2015). The Hot Spot Program is aimed at stationary (as opposed to temporary construction) sources and long-term exposure construction of the proposed project would not result in long term exposure to nearby residents. Thus, construction activities associated with the proposed project are expected to have a less than significant impact on sensitive receptors or nearby residents.

Operation of the proposed project has the potential to contribute to traffic volumes in the nearby roadway system. Congested intersections have the potential to result in localized high levels of CO, which results from incomplete combustion of carbon containing fuels (e.g., gasoline and diesel). CO exposure can have a significant impact on sensitive receptors. To this end, A CO analysis was conducted for intersections expected to be impacted by the implementation of the proposed project.

**Carbon Monoxide Analysis.** To determine impacts associated with CO emissions, a CO analysis was conducted for operation of the five intersections listed below.

Rose Avenue and Gonzales Road – #4

Rose Avenue and Fifth Street – #13

Camino Del Sol and Gibraltar Street – #16

Rice Avenue and Gonzales Road – #20

Rice Avenue and Camino Del Sol – #21

A summary of calculated CO concentrations at receptor locations, their comparison with the NAAQS for CO, and impact determination are provided in Table 3-8.

**Table 3-8.** Carbon Monoxide Analysis

Receptor Description	Carbon Monoxide Concentration (ppm)	Threshold (ppm)	Significant Impact?
Business on NE quadrant of Rose Avenue and Gonzales Road	8.8	20	No
Business on NW quadrant of Rose Avenue and Gonzales Road	8.9	20	No
Business on SE quadrant of Rose Avenue and Gonzales Road	9.5	20	No
Residence on SW quadrant of Rose Avenue and Gonzales Road	5.8	20	No
Business on SW quadrant of Rose Avenue and Fifth Street	6.8	20	No
Residence on SW quadrant of Camino Del Sol and Gibraltar Street	6.8	20	No
Residence on SE quadrant of Camino Del Sol and Gibraltar Street	6.6	20	No
High School No. 8	4.6	20	No
Business on NW quadrant of Rise Avenue and Gonzales Road	7.8	20	No
Business on SW quadrant of Rise Avenue and Camino Del Sol	6.9	20	No
Business on NE quadrant of Rise Avenue and Camino Del Sol	6.3	20	No

Notes: NE northeast  
NW northwest  
ppm parts per million  
SE southeast  
SW southwest

Based on the CO analysis presented above, project impact would be less than significant.

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

While the project would be adjacent to agricultural fields, the types of crops grown at these fields are not anticipated to create objectionable odors. Additionally, VCAPCD Rule 51 (Nuisance) exempts odors emanating from agricultural operations necessary for the growing of crops from being classified as nuisance. This exemption is consistent with the California Health and Safety Code Section 41705. Emissions from construction equipment will be temporary and are not listed as odorous sources in the Guidelines. Thus, odor emissions from construction operations are not expected to have an adverse impact on receptors in nearby businesses and housing. Operation of the proposed project is not expected to create objectionable odors since its primary function is to provide educational services. Based on this analysis, the proposed project is not expected to result in objectionable odors affecting a substantial number of people and project impact would be less than significant.

### **3.3.2.4 Cumulative Impacts**

The proposed project would result in significant cumulative impacts if it exceeds daily thresholds of significance established by VCAPCD or if it incurred in an increase of emissions beyond what is planned in the City of Oxnard General Plan. As noted above, the proposed project would not result in significant cumulative impacts since it does not exceed daily thresholds of significance established by VCAPCD or result in an increase in emissions beyond what is planned in the City of Oxnard General Plan and thereby the applicable AQMP. Project contribution toward cumulative impacts would be less than significant.



### 3.3.2.5 Mitigation Measures

**AQ-1:** In accordance with standard practice pursuant to the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations during project construction the contractor shall ensure that:

- All soil excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed soil areas. Watering shall be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations.
- All clearing, earth moving, and excavation activities shall cease during periods of winds greater than 20 miles per hour (mph) (averaged over one hour), if disturbed material is easily windblown, or when dust plumes of 20% or greater opacity impact public roads, occupied structures, or neighboring property.
- All fine material transported off-Site shall be either sufficiently watered or securely covered to prevent excessive dust.
- All haul trucks shall be required to exit the Site via an access point where a gravel pad or grizzly has been installed.
- Stockpiles of soil or other fine loose material shall be stabilized by watering or other appropriate method to prevent wind-blown fugitive dust.
- Once initial leveling has ceased, all inactive soil areas within the construction Site shall either be seeded and watered until plant growth is evident, treated with a dust palliative, or watered twice daily until soil has sufficiently crusted to prevent fugitive dust emission.
- On-Site vehicle speed should be limited to 15 mph.
- All areas with vehicle traffic should be paved, treated with dust palliatives or watered a minimum of twice daily.
- Properly maintain and tune all internal combustion engine powered equipment;
- Require employees and subcontractors to comply with the CARB idling restrictions for compression ignition engines; and use California ultra-low sulfur diesel fuel; use construction equipment with Tier 2 engines; and use interior and exterior paint with a VOC content of 100 grams per liter.

### 3.3.2.6 Level of Impact After Mitigation

Mitigation Measure AQ-1 is provided to meet VCAPCD and CARB compliance requirements. With implementation of AQ-1, project impact would be less than significant.

## 3.4 BIOLOGICAL RESOURCES

This section describes existing biological resources within the proposed project Site and provides an assessment of potential impacts to biological resources from implementation of the proposed project. As noted in the Initial Study (Appendix A), impacts associated with riparian habitat or other sensitive natural communities, protected wetlands, and an adopted Habitat Conservation Plan/Natural Community Conservation Plan were found to have a less than significant impact and are not discussed in detail in the EIR. For identified potential impacts discussed below, mitigation measures pursuant to the Federal Endangered Species Act (ESA), California ESA, and CEQA have been prescribed as applicable.

### 3.4.1 Environmental Setting

#### 3.4.1.1 Existing Conditions

The project Site is currently used for the cultivation of strawberries. Historical aerial photographs, Google Earth images, and information from the land owners indicate that the project Site has been used for cultivation of row crops from as early as 1869 to the present.

The project Site is located within an urban environment surrounded by agricultural land (that currently has an application with the City for proposed residential development) to the north; single family residential land and Rio Rosales Elementary School to the east; single and multi-family residential and commercial land to the south; and single-family residential land to the west.

A general biological survey conducted on January 29, 2019 verified that the project Site is located within a developed urban environment and no native vegetation communities occur within the Site boundary. The entire Site is used for agriculture. During the biological survey a total of 21 plant species (2 native and 19 non-native) and 8 wildlife species (7 native and 1 non-native) were observed on Site. Non-native cultivated strawberries (*Fragaria* sp.) are the dominant plant on the project Site, and other non-native species including common sow thistle (*Sonchus oleraceus*), lemon (*Citrus limon*), cheeseweed (*Malva parviflora*), bougainvillea (*Bougainvillea* sp.), annual beard grass (*Polypogon monspeliensis*), and eucalyptus (*Eucalyptus* sp.) occurred mostly on the fringe/edges of the cultivated rows. The two native plant species observed were horseweed (*Erigeron canadensis*), which occurred on the fringe/edges of the cultivated rows primarily near to Camino Del Sol, and coast live oak (*Quercus agrifolia*), of which approximately three seedlings were observed along the southwestern Site boundary. A windrow of eucalyptus trees is located at the western project Site border, adjacent to Rose Avenue. This eucalyptus windrow consists of a dense linear stand of mature eucalyptus trees in the area between the paved portion of Rose Avenue and the start of cultivated strawberry rows. The proposed project includes roadway improvements that would require removal of the existing eucalyptus windrow trees along Rose Avenue. Wildlife observed included species tolerant of urban environments such as: non-native European starling (*Sturnus vulgaris*), native Anna's hummingbird (*Calypte anna*), native house finch (*Haemorhous mexicanus*), native red-tailed hawk (*Buteo jamaicensis*), native mourning dove (*Zenaidura macroura*), native song sparrow (*Melospiza melodia*), native white-crowned sparrow (*Zonotrichia leucophrys*), and native gull (*Larus* sp.). No potential waters of the U.S. and/or wetlands were observed on the project Site.

#### 3.4.1.2 Regulatory Setting

##### Federal

##### **Federal Endangered Species Act (ESA)**

Title 16, United States Code, §1531 et seq., and Title 50, Code of Federal Regulations, part 17.1 et seq., designate and provide for the protection of threatened or endangered plant and animal species and their critical habitat. The ESA applies to federally-listed threatened or endangered species and their habitat, as well as designated critical habitat. The administering agency is the United States Fish and Wildlife Service (USFWS). Federal agencies that

permit, license, fund, or other authorize a project activity with potential impacts to these resources must consult with the USFWS to ensure that actions would not jeopardize any listed species or adversely affect critical habitat.

### **Federal Migratory Bird Treaty Act (MBTA)**

Title 16, United States Code, §703 et seq., protects native bird species and their nests. All migratory birds and their parts (i.e., eggs, nests, and feathers) are fully protected under the MBTA. The MBTA prohibits the take, possession, import, export, transport, selling, purchase, barter, or offering for sale of any migratory bird or its parts, unless authorized under a valid permit. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (Title 50, Code of Federal Regulations, §10.13).

### **State**

#### **California ESA**

The California ESA is administered by the CDFW and prohibits take of plant and animal species identified as threatened or endangered in the State of California by the Fish and Wildlife Commission. "Take" of a species means to hunt, pursue, catch, capture, or kill or attempt to hunt, pursue, catch, capture or kill that species. The CDFW is a trustee agency under CEQA for biological resources throughout the state. Similar to the USFWS under the Federal ESA, the CDFW requires formal consultation under the California ESA for projects that may jeopardize or result in potential impacts to the continued existence of any state-listed species or adversely modify critical habitat.

### **Local**

Local agencies, such as the City of Oxnard Planning Department, aid in the protection and preservation of special-status species and other sensitive natural resources in exercising land use controls. The Background Report of the City of Oxnard's 2030 General Plan Program EIR (City of Oxnard 2009) combined with other General Plan Elements and the Oxnard CEQA Guidelines, strive to achieve this control in defining certain goals and policies for the conservation of sensitive natural resources.

## **3.4.2 Impact Analysis**

### **3.4.2.1 Methodology**

The analysis contained within this EIR is based on a review of pertinent background information for the project Site, including the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) data, U.S. Geological Survey (USGS) topographic maps, a project-specific biological Site visit conducted on January 29, 2019, and the associated Initial Study that was completed prior to initiation of this EIR. Special-status species are defined herein as plant and wildlife holding a status of sensitive, threatened, endangered, rare, or candidate status as defined by CDFW, USFWS, or the Bureau of Land Management. The special-status species presented in Table 3-9 are those with any chance of potentially occurring within or adjacent to the project Site based on regional occurrence and habitat present on the project Site (CDFW 2019). The biological Site visit focused on assessing the project Site for potential occurrence of special-status species identified during the CNDDDB database query and habitats that could support those species.

**Table 3-9.** Special-Status Wildlife Species with Potential to Occur

Common Name	Scientific Name	Federal Status / State Status	Other Status	Potential to Occur
<b>Birds</b>				
burrowing owl	<i>Athene cunicularia</i>	- / -	S, SSC	<b>Low</b> - no suitable burrow habitat observed on-Site.

Common Name	Scientific Name	Federal Status / State Status	Other Status	Potential to Occur
ferruginous hawk	<i>Buteo regalis</i>	- / -	WL	<b>Low</b> - lack of suitable habitat and prey species on Site.
white-tailed kite	<i>Elanus leucurus</i>	- / -	S, FP	<b>Low</b> - lack of suitable habitat and prey species on Site.
California horned lark	<i>Eremophila alpestris actia</i>	- / -	WL	<b>Low</b> - lack of suitable habitat on Site.
American peregrine falcon	<i>Falco peregrinus anatum</i>	FD / SD	FP	<b>Low</b> - lack of suitable habitat and prey species on Site.
<b>Mammals</b>				
pallid bat	<i>Antrozous pallidus</i>	- / -	S, SSC	<b>Low</b> - lack of suitable roosting habitat on Site; not highly tolerant of urban areas.
western mastiff bat	<i>Eumops perotis californicus</i>	- / -	S, SSC	<b>Low</b> - lack of suitable habitat on Site; not highly tolerant of urban areas.

Notes: Results based on CNDDDB query for six regional quadrangles (Oxnard, Ventura, Saticoy, Santa Paula, Camarillo, Point Mugu).

FD	Federally Delisted
FP	CDFW Fully Protected
S	BLM Sensitive Species
SD	State Delisted
SSC	CDFW Species of Special Concern
WL	CDFW Watch List

During preparation of the Initial Study, it was determined that the proposed project could potentially result in significant but mitigatable impacts associated with three of the criteria used in determining impact significance consistent with Appendix G of the CEQA Guidelines. These identified impacts relate to special-status species, nesting bird species, and a local policy protecting biological resources.

### 3.4.2.2 Significance Thresholds

The thresholds for biological resource impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *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 CDFW or USFWS?*
- *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?*

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

### 3.4.2.3 Project Impacts

**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 CDFW or USFWS?**

The project Site is located within an urban area of the City of Oxnard and is not located within or directly adjacent to any known or mapped wildlife corridors or nursery sites. Accordingly, the potential for candidate, sensitive, or special-status species or habitats is low within City limits. The project Site is currently used for the cultivation of strawberries. A query of the CDFW CNDDDB was conducted to determine the known locations of any special-status species or habitats (sensitive, threatened, endangered, rare, or candidate species) within and surrounding the project Site (CDFW 2019). This included Oxnard, located within the Oxnard quadrangle, and the six adjacent quadrangles (Table 3-9). The wildlife species presented in Table 3-9 are those with any chance of potentially occurring within or adjacent to the project Site based on regional occurrence and habitat present on Site. Due to the active agricultural use of the Site and plant list established during the general biological survey, there is no potential for special-status plants to occur on the project Site.

Due to the active agricultural use of the project Site, it is unlikely that any special-status species would occur. No small mammals, reptiles, or associated burrows/evidence of frequent small mammal or reptile activity was observed on Site; therefore, there is a lack of suitable prey for ferruginous hawk (*Buteo regalis*), white-tailed kite (*Elanus leucurus*), and American peregrine falcon (*Falco peregrinus anatum*), and the potential for these species to occur on Site is low. Due to the probable use of pest and weed control methods associated with active agricultural, seeds, insects, and desirable habitat for California horned lark (*Elanus leucurus*) is minimal, therefore the potential for horned lark to occur on Site is low. The western mastiff bat (*Eumops perotis californicus*) and pallid bat (*Antrozous pallidus*) could potentially roost in adjacent farm buildings, or in eucalyptus windrow trees; however, the potential for roosting to occur on Site is low, as this is not the preferred roosting habitat of these species, and these bat species are not highly tolerant of urban areas.

Agricultural land can be considered suitable habitat for burrowing owl (*Athene cunicularia*), dependent upon the presence of burrowing mammals or suitable surrogate burrows. The nearest CNDDDB burrowing owl occurrence is approximately 3 miles from the project Site. No burrows, sedentary above ground pipes, or sedentary rip rap that could serve as suitable burrow habitat for burrowing owl were observed on Site; therefore, the potential for burrowing owl to occur on the project Site is low. While the potential for burrowing owl to occur on Site is low, burrowing owl may attempt to colonize an area that would be impacted by the proposed project if suitable burrow habitat becomes available prior to commencement of construction activities. Therefore, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb burrowing owl, if present.

Aside from the species presented in Table 3-9, while unlikely, special status bird species that do not necessarily have documented regional occurrences near to the project Site could occur. These species would be considered transients and would not be expected to have long term use of the Site.

The eucalyptus windrow trees located at the western project Site border, adjacent to Rose Avenue, are the only natural resource on or adjacent to the project Site. The eucalyptus trees do not provide a native vegetation community that could support special-status species long term, however these trees could support nesting activity. The general biological survey was conducted outside of the bird nesting season; however, one inactive nest was observed within the eucalyptus windrow trees at the western project Site border. Additionally, other vegetation and structures within and adjacent to the Site have the potential to serve as habitat for nesting birds. Therefore, direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds, including special status bird species, if present. The proposed project includes



roadway improvements that would require removal of the existing eucalyptus windrow trees along Rose Avenue. With implementation of mitigation measures BIO-1, BIO-2, and BIO-3, project impacts to special status species would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 15 to September 15.

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

The project Site is located within a developed urban environment. The project Site is not located within, or directly adjacent to, any known or mapped wildlife corridors or nursery sites. The eucalyptus windrow trees located at the western project Site border, and other vegetation and structures within and adjacent to the Site have the potential to serve as habitat for nesting birds. The general biological survey was conducted outside of the bird nesting season. However, one inactive nest was observed within the eucalyptus windrow trees at the western project Site border. These eucalyptus trees have the highest potential to support nesting activity; additionally, other vegetation and structures within and adjacent to the Site have the potential to serve as habitat for nesting birds. Therefore, direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds if present. The proposed project includes roadway improvements that would require removal of the existing eucalyptus windrow trees along Rose Avenue. With implementation of mitigation measure BIO-1, project impacts to the movement of any native resident or migratory wildlife species, established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 15 to September 15.

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

There are eucalyptus windrow trees located at the western project Site border, adjacent to Rose Avenue. The infrastructure improvements proposed for Rose Avenue would require the removal of these eucalyptus windrow trees. The City of Oxnard does not have a tree preservation policy or ordinance, and the removal of windrow trees has been identified as a visual impact (discussed in Section 3.1, *Aesthetics*) and not a biological impact. Therefore, the removal of the eucalyptus windrow trees would not conflict with any local policies or ordinances protecting biological resources, and no impact would result.

### **3.4.2.4 Cumulative Impacts**

Cumulative impacts are incremental effects of an individual project when combined with effects of past, current, and potential future projects. Because the project Site is active agricultural land with very little natural habitat surrounding the Site, and would be infill of development within an urban area, cumulative impacts to biological resources would be less than significant.

### **3.4.2.5 Mitigation Measures**

**BIO-1:** A preconstruction nesting bird survey shall be conducted by a qualified biologist prior to tree removal, the use of heavy machinery, or significant ground disturbance if activities are to be conducted within the bird nesting season (February 15 – September 15). The survey shall be required within 72 hours prior to the commencement of construction activities if they occur in the bird nesting season. The survey shall occur within the Site and a 250-foot buffer area around the Site, access permitting, which will include any adjacent trees. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. If birds are found to be actively nesting within the project Site or within 250 feet of the work area, an appropriate exclusionary buffer around the active nest shall be established by the qualified biologist. The buffer distance will be determined based on the nesting species. No

construction activities would be allowed within the buffer until the birds have fledged from the nest. Active nests and buffers would be monitored as needed by a qualified biologist to determine if active nests are being adversely affected by project activities. At a minimum, a qualified biologist would visit an active nest weekly to determine the status of the nest. Only when the nest becomes inactive (nestlings have fledged) will the buffer and biological monitoring no longer be needed.

**BIO-2:** A preconstruction survey for burrows and burrowing owl shall be conducted by a qualified biologist prior to the use of heavy machinery and/or significant ground disturbance associated with construction activities. The survey shall be required within 5 days prior to the commencement of construction activities and shall occur within the Site and a 150-foot buffer area around the Site, access permitting. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. Should a suitable burrow and/or burrow surrogate (>11 cm in diameter (height and width) and >150 cm in depth) (Johnson et al. 2010) be identified on Site or within the 150-foot project Site buffer, wintering and nesting season surveys shall be conducted in accordance with the guidelines described in the *CDFW Staff Report on Burrowing Owl Mitigation, 2012* (CDFW 2012). If burrowing owls are detected within the project Site or within the 150-foot project Site buffer, no construction work can occur, and the CDFW shall be contacted immediately to develop and implement a mitigation plan to protect burrowing owls and their nest sites. The burrowing owl survey can be conducted in conjunction with the nesting bird survey, if timing is appropriate.

**BIO-3:** Any construction materials stored on-Site that could serve as a burrow surrogate for burrowing owl, such as sedentary above ground pipes or sedentary rip rap, shall be covered when not in use as to not attract burrowing owls to the project Site.

#### **3.4.2.6 Level of Impact After Mitigation**

With the implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3, potential project impacts would be reduced to less than significant.

## 3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

This section describes existing cultural and tribal resources within the proposed project Site and provides an assessment of potential impacts to cultural and tribal resources from implementation of the proposed project. As noted in the Initial Study (Appendix A), impacts associated with human remains were found to have a less than significant impact, however based on new information, this issue is discussed in detail within the EIR. This section identifies cultural and tribal resources within the project and surrounding area, evaluates potential project-related impacts on those resources, and provides mitigation measures, as applicable. Cultural resources are defined as buildings, sites, structures, districts, and or objects that have historical, architectural, archaeological, cultural, or scientific significance. Tribal cultural resources are defined as a Site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe.

This analysis was prepared based on the Phase I Archaeological Study (Provenience Group, Inc. 2019a) and Extended Phase 1 Archaeological Subsurface Testing (Provenience Group, Inc. 2019b) studies prepared and conducted for the project (Appendix D). As part of these studies, a record search, a phase I archaeological survey, and extended phase I limited testing program, and tribal coordination was conducted for the project.

### 3.5.1 Environmental Setting

#### 3.5.1.1 Existing Conditions

The proposed project includes a portion of Maulhardt Property, a 107-acre parcel in the City of Oxnard, California. The Maulhardt Property has been owned and operated by the Maulhardt family since 1869 and is still being used as a residence by the Maulhardts (the existing residential area is not included in the proposed project) and for agricultural. The proposed 48.6-acre project Site is currently used for strawberry cultivation and is located within the southern expanse of the Santa Clara River flood plain. The rows of strawberries consist of raised beds that are about 8 to 12 inches high, 32 inches at the base, 30 inches at the top, and with a slightly crowned top to allow for water runoff. The raised beds are covered in plastic and consist of four offset rows of strawberries and three drip lines per bed. Narrow passageways, about 6 inches wide, are located between each bed. The tops of the beds are level with the roads and surrounding ground surface. The entire project Site has been previously disturbed due to agricultural practices and surficial soils have been disced and plowed and are considered disturbed within the plow zone (approximately 0-12 inches below ground surface). The parcel is surrounded by residential properties on each side, and the Rio Rosales Elementary School and Park are located to the east-northeast and Del Sol Park is present to the southwest. The topography of the agricultural field is mostly flat. The elevation at the project Site ranges between approximately 54 and 60 feet above mean average sea level (amsl). The project area is in the western portion of the Transverse Ranges Geomorphic Province. It is within the Oxnard Plain, a large alluvial basin bounded on the north by the Santa Clara River and on the south by Calleguas Creek and the Santa Monica Mountains. Alluvial sediments, including poorly consolidated silt, sand, and gravel deposits along modern drainages and alluvial fans and floodplains appear in lower elevations. Elevations in the project's surrounding area range from 60 to 65 feet amsl, and soils consist of Holocene wash deposits composed of unconsolidated sand, silt, and gravel.

#### Prehistory

The history of human habitation in Ventura County extends back at least 12,000 years on the Channel Islands, and 6,900 years in the mountainous interior. Permanent villages or base camps would have been at lower elevations, along creeks and river drainages. Prehistoric archaeological sites within Ventura County range from chipped stone debitage and fire-affected rock at higher elevations, which indicates specialized activities and short-term occupation akin to camping, to multi-component sites representing base or seasonal settlements along the coast and closer to creeks and drainage bottoms.

### Paleo-Indian Period (12,000 to 8,000 cal B.C.)

The Paleo-Indian Period is the earliest known human occupation of the Ventura County area, with evidence of a developing maritime culture found mostly on the Channel Islands. Recent work by scholars has pressed these earliest dates back further. People used relatively simple technology to procure plant foods, shellfish, and a limited variety of vertebrate species. Mainland coastal sites occupied during this time would later become submerged by rising sea levels. Presently, there is a lack of archaeological evidence that demonstrates Paleo-Indian occupation in Ventura County.

### Early Period (7,000 to 2,000 cal B.C.)

The Early Period reveals the earliest evidence of established occupation, with the Millingstone Horizon ending around 5,000 B.C. Most of the archaeological sites from this period are recorded at or near the coast, or on the Channel Islands. This period is characterized by a subsistence shift to small seeds found in the chaparral plant community, as demonstrated by the abundance of multi-facial manos. Other common artifacts include metates, and a variety of flaked stone; plano-convex cores and core tools of quartzite, basalt and other volcanic stones. Larger populations were supported by a more diversified subsistence base that included not only seeds and other plant resources, but terrestrial and marine mammals, fish, and shellfish. Although deer are represented in the archaeological record, hunting and fishing contributed little to the diet, with the faunal diet relying heavily on mussels and Pismo clams. Residential bases are presumed to have been comprised of extended families during this period. Although quantities of animal bones do not appear to increase much in the archaeological record, hunting gained more prominence, as indicated by the variety of flaked stone artifacts and tools. A semi-sedentary lifestyle seems to have evolved. Occurrences of digging stick weights suggest harvest of tuberous plants.

### Middle Period (1,400 B.C. to A.D. 1,150)

The Middle Period is marked by continued subsistence intensification and increased technological and economic complexity. Several technological developments include the inception of the mortar and pestle for processing acorns and other foods, use of the bow and arrow to replace the atlatl for hunting, and the introduction of the plank canoe (tomol), to more effectively exploit marine resources. Coastal settlement increases significantly between 2,000 and 1,000 B.C. During this period, sedentism is apparent, along with formal architecture, ceremonial structures and traditional cemeteries.

### Middle to Late Transition Period (A.D. 1,150 - 1,300)

The Middle to Late Transition Period is characterized by the beginnings of political and social complexity and development of social hierarchy. Inland settlement became more pronounced as a result of climatic shifts and elevated sea temperatures. Population densities expanded, along with more sophisticated technology and craft specialization. By the end of this period, Olivella callus beads were used as currency throughout the region, and trade networks intensified between villages. There was an increase in the manufacture of elaborate shell ornaments and beads for trade between the Santa Barbara Channel groups, their neighbors, and the interior. By the Late Transition Period, climatic fluctuations that increased ocean temperatures prompted a decrease in maritime activities and augmented a shift in settlement away from the coast as populations moved inland.

### Late Period (1,000 cal A.D. to Missionization)

Around 1,000 A.D., the Medieval Climatic Anomaly, a 300-year period of warmer temperatures and drier climate, caused consequential, adverse environmental conditions, particularly intermittent droughts. During the Late Period, terrestrial resource production is thought to have decreased significantly, while socioeconomic complexity evolved. A conversion to concave based projectile points led to the abandonment of asphaltum, which had been used for hafting. Shellfish remained the principal protein food. During this period, a ranked society with hereditary elite was established and population growth and socioeconomic complexity transpired. Several new artifact styles became popular after A.D. 1300, including leaf-shaped and triangular concave-based arrow points, “flowerpot” mortars, and

circular shell fishhooks. It is likely that the aboriginal society was akin to the Chumash culture first encountered by Europeans.

### **Ethnographic Context**

The project is within the ethnographic territory traditionally inhabited by the Chumash people. The Chumash territory is divided by seven linguistic subgroups. Their territory extended from San Luis Obispo to Malibu, and inland as far as the San Joaquin Valley. Specifically, the project is within the ethnographic and historic territory inhabited by the Ventureño Chumash dialect group. The Chumash were a non-agrarian culture known for having one of the most populous thriving, advanced societies of hunting-gathering California Native American groups. They practiced a regular seasonal round of population dispersal and aggregation in response to the location and seasonal availability of different food resources. In this way, large coastal villages would have been fully populated only in the late summer when pelagic fishing was at its peak. Shellfish were also exploited, including mussel and abalone from rocky shores and cockle and clams from sandy beaches. Acorns were a food staple; they were ground into flour using stone mortars and pestles and then leached to remove tannic acid. In addition, a wide variety of seeds, including chia from various species of sage, were utilized. Through the winter months, the Chumash depended largely on stored food resources.

In this area, as elsewhere in California, basketry served many of the functions that pottery did in other places. Baskets were used for cooking, serving, storage, and transporting burdens. Some basket makers wove baskets so tightly that they could hold water, while others waterproofed their baskets by lining them with pitch or asphaltum.

The Chumash lived in large, hemispherical houses constructed by planting willows or other poles in a circle and bending and tying them together at the top. These structures were then covered with tule mats or thatch. Structures such as this housed 40 to 50 individuals, or three-to-four-member family groups. Dance houses and sweathouses are also reported for the Chumash.

Political organization was typified by small-scale chiefdoms. Chiefs were associated with villages or segments of larger villages. Higher status chiefs controlled entire regions containing several villages. The chiefly offices were normally inherited through the male line with a primogeniture rule in effect. Chiefs had several bureaucratic assistants to help in political affairs and serve as messengers, orators, and ceremonial assistants. Several status positions were associated with specialized knowledge and rituals, such as a weather prophet, ritual poisoner, or herbalist.

The protohistoric culture of the Chumash, defined as the time when intermittent trade and contact was experienced between Native Americans and Spanish trading vessels in route to the Orient, was disrupted by the arrival of the Spanish expedition led by Gaspar de Portolá in 1769. The establishment of the San Buenaventura Mission in 1782 further disrupted Chumash culture in Ventura County. Archaeological evidence verifies not only that the native population was rapidly decimated by missionization, but also that the culture itself disintegrated rapidly. Disease and forced relocation to Mission San Buenaventura disrupted traditional subsistence systems and, by 1810, most of the Chumash villages had been abandoned.

### **Historic Period**

#### **Mission Period (1760-1821)**

In 1542, Juan Sebastián Cabrillo was the first of the exploring Europeans to sail along the California coast. The aftermath of Spanish exploration in Alta California led to immigrations and settlement. In 1769, Gaspar de Portolá led the first land expeditions from Baja California to the San Francisco Bay. Coined the Sacred Expedition, Fray Junípero Serra joined the journey with the intent to establish California missions and colonize the region. During the expedition, the Site was selected for the future San Buenaventura Mission that was eventually established in 1782 as the ninth of 21 missions established in Alta California. Newly baptized Chumash provided nearly all the labor to construct and maintain the missions, which soon produced surplus amounts of wheat, beans, corn, cattle, and sheep for trade. By 1804, five missions had been established in Chumash territory. During this period, many



Native American tribes and mission neophytes were decimated due to exposure to European diseases, slavery, and forced lifestyle and cultural changes that resulted in low fertility rates and high infant mortality.

To some extent, the San Buenaventura Mission and other missions along the central coast were somewhat geographically disconnected from the Alta California headquarters in Monterey and Los Angeles, largely due to a lack of accessible seaports and the shortcomings of travel along El Camino Real. The geographic divide continued during Mexican revolution from 1810 to 1821.

#### Rancho Period (1821-1845)

California officially became a Mexican Territory after the Treaty of Cordoba was signed in 1821. The transfer of sovereignty from Spain to Mexico altered Mission San Buenaventura irrevocably. After secularization of the missions in 1834, approximately ten million acres were gradually transferred to private ownership via a system of land grants. Mexican officials dispersed large land grants to former Mexican military soldiers and their descendants as compensation for their service. In 1837, Governor Juan B. Alvarado ceded Rancho El Rio de Santa Clara o La Colonia, consisting of 44,883-acres of fertile soil in the plain south of the Santa Clara River, to a group of former soldiers who had served at the Santa Barbara Presidio. The soldiers included Valentine Cota, Salvador Valenzuela, Vicente Pico, Rafael Valdez, Vincent Feliz, Leandro Gonzalez, Rafael Gonzalez, and Jose Maria Valenzuela. Native people who suffered from the mission's reduced economic circumstances were hired as vaqueros at the ranches.

#### Anglo-Mexican Period (1845-1880)

The Mexican-American War in 1846 weakened Mexico's hold on Alta California, and American influence steadily increased. In 1848, hostilities between the Mexican Californios and the Americans ceased and the two-year war ended with the Treaty of Guadalupe Hidalgo. Thus, California was declared a United States territory, and in 1850 it became the nation's thirty-first state. Following statehood, passage of the Land Act of 1851 created the California State Lands Commission to adjudicate disputes regarding Mexican citizens' land claims, to determine their validity, and redistribute land where ownership was in question. Often land grants were denied to the original grantee when formal legal documents were lacking, and the property fell into the hands of new owners, generally the recent American arrivals. This process also allowed settlers to homestead on unclaimed government lands. Proper documentation was filed for Rancho El Rio de Santa Clara o La Colonia in 1852, and 20 years later, it was legally patented.

During the Gold Rush, a rapid population increase caused the demand (and price) for California livestock to soar. However, a long drought from 1860 to 1864, which coincided with the Civil War, was devastating for the cattle industry throughout California. It decimated large numbers of cattle within Ventura County. As a result, most of the ranchos were divided up and sold, with large acreages purchased by investors from the east, some who hoped to profit amid reports of oil discoveries in the area. Over the next twenty years, American settlers continued their influx into the state of California, with many marrying into the families of wealthy Californios and gradually outnumbering the Mexican citizens.

In 1865, Rafael Gonzalez sold 4,000 acres of La Colonia to Juan Camarillo. By 1866, German immigrant Johannes Christian Borchard arrived in the area and sought arable land for crop production and sheep grazing, and in 1866, he purchased the Gonzalez home and 1,000 acres of Rancho El Rio de Santa Clara o La Colonia, which had belonged to Leandro and Rafael Gonzalez. In the following year, German settlers Gottfried and Sophie Maulhardt and brothers Jacob and Anton Maulhardt arrived. In 1871, other portions of the land grant were bought by Thomas Bard who subdivided much of the rancho into farm plots and sought to establish a wharf so that crops could be loaded on ships locally for transport to market.

In 1872, after Christian Borchard found that barley crops thrived in alkali soils, brothers Jacob Maulhardt, Gottfried Maulhardt, and Johannes Borchard purchased 1,230 acres of prime farm land from Juan Camarillo. This property was later divided in three equal shares of 410 acres each. In 1878, Jacob Maulhardt built his home on the property and raised a family with wife Dorethea Kohler.

Along with agriculture, homes and businesses sprang up and towns emerged in the area that would later become Ventura County. In 1866, the community of San Buenaventura was incorporated and consisted of a wharf, courthouse, bank, and library. Ventura County then seceded from Santa Barbara County in 1873.

#### Americanization Period (1880-1915)

During the early American Period, the ranchos continued to raise cattle and sheep, but the industry shifted from hides and tallow to dairy, meat, and agricultural products such as lima beans and sugar beets. In 1887, the Southern Pacific Railroad constructed a spur from the Newhall Pass to San Buenaventura. The Oxnard Depot was constructed in 1897 in an effort to expedite shipments of agricultural products produced in the Santa Clara River Valley and Oxnard Plain. The American Beet Sugar Factory was opened for business in 1898 by entrepreneur Henry T. Oxnard. The successful factory offered prosperity for the farming community that would later be named Oxnard. Mr. Oxnard was a well-known 'sugar baron' who had established the American Crystal Sugar Company. He was persuaded to invest in the superior quality sugar beets grown by farmers Albert Maulhardt, John Borchard, and others. The profitable \$2 million sugar facility had the capacity to process 2,000 tons of sugar beets daily, which eliminated the need for shipping the product elsewhere. The factory also provided plenty of jobs for the community. For a time, it was considered the world's largest sugar beet factory.

In 1898, the townsite of Oxnard was platted by James A. Driffill of the Colonia Improvement Company, who also managed construction of the sugar mill. The sugar beet industry created a population surge that brought many foreign workers, especially Japanese immigrants. In 1903, Oxnard became incorporated. Louis G. Maulhardt inherited 100 acres of the Maulhardt Property after his father's death in 1899. He later accumulated additional acreage, where he and his wife Theresa Borchard raised a family and successfully expanded the farming operation.

#### Twentieth Century Development (1915-Present)

Around 1915, the original Maulhardt Property farm house was demolished and replaced with a new residence. The Great Depression of the 1930s were a difficult time in Oxnard, as it was throughout the United States. However, Oxnard felt an economic upswing during the 1940s, as it experienced significant growth due to increased populations and business interests subsequent to World War II. People were attracted to Oxnard and the overall Ventura County area by jobs in the petroleum industry at the Oxnard Oil Fields, the aerospace and technology, and other industry and retail business opportunities. In 1947, the Wagon Wheel Junction, conceived by developer Martin V. Smith, was a central automobile stop on the 101 Freeway between Los Angeles and Santa Barbara County, offering shopping, dining, and lodging accommodations for travelers. Between 1940 and 1950, the population more than doubled, from approximately 8,500 to over 21,500 residents. By 1960, there were more than 40,000 people living in Oxnard. Agriculture remained strong in Oxnard with sugar beet industry leading, with an estimate of 40 million bags of 100-pound sugar produced from local sugar beets for a duration of 60 years. Oxnard's sugar beet factory closed in 1958, due to the increased cost for crop production in California, as well as competition abroad and in the Southern states. Oxnard continues to be a producer of agricultural crops, such as celery, strawberries, beans, chili peppers, onions, and bell peppers, but much of the former farm land has been replaced by commercial and retail development, as well as recreation and tourist attractions at the Channel Islands Harbor, Fisherman's Wharf, and the Maritime Museum.

#### **Record Search**

Identification efforts for this inventory included review of existing Site records, previously conducted surveys in the area, historic maps, and homestead land patents. The record search study area includes the project Area of Potential Affect (APE) and a 0.5-mile radius around the project area (See Appendix D).

On March 12, 2019, a literature and records search was conducted of the cultural resource site and project file collection at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System, at the California State University, Fullerton, California. As part of this record search, the SCCIC database of survey reports and overviews as well as documented cultural resources, cultural landscapes, and ethnic resources was consulted. Additionally, the search included a review of the following publications and lists: California

Office of Historic Preservation (OHP) Historic Properties Directory/National Register of Historic Properties, OHP Archaeological Determinations of Eligibility, California Inventory of Historical Resources/California Register of Historic Resources, California Historical Landmarks, ethnographic information, historical literature, and historical maps.

The records search revealed a total of 14 previous cultural resources investigations have been conducted within 0.50-mile of the project area. The records search did not identify any previously recorded prehistoric or historic cultural resources within 0.5-mile of the project area, which suggests the area has a low archaeological sensitivity.

#### **Native American Heritage Commission Sacred Lands File Search and Tribal Outreach**

An important part of CEQA is consultation with the Native American Heritage Commission (NAHC) and the local Native American community. The NAHC was contacted to request a Sacred Lands file search. The NAHC responded on March 15, 2019 that results of the sacred land file search was negative and no tribal cultural resources were identified by their search as within the proposed project area (see Appendix D). A list of 10 Native American contacts was also provided. A project outreach letter was sent to each of the individuals listed by the NAHC on March 18, 2019. The letter provided information regarding the project and a request regarding any known cultural resources in the project study area. The outreach letters are for informational purposes only and do not take the place of formal consultation under AB 52 between the lead agency and tribes. Outreach to these contacts and meaningful discussions may reveal tribal cultural resources that could be impacted by the proposed project or provide community concerns regarding the project's treatment of cultural resources. No responses were received.

No responses were received in reply to the letter. Follow-up phone calls were made on March 22, 28, and 29, 2019. The following responses were received:

- March 22, 2019: Patrick Tumamait, Barbareño/Ventureño Band of Mission Indians, inquired if a record search had been completed.
- March 18, 2019: Julie Tumamait-Stennslie, Barbareño/Ventureño Band of Mission Indians, commented that the area is sensitive and that there are tribal resources near the area. She recommended conducting shovel test pits or trench testing due to the lack of archaeological surveys. She stated the area is in a flood plain and based on her experience, subsurface deposits can be deeply buried. She provided an example of a burial site identified 6 feet below the surface near the Cuyama river. She also commented that cultural material within the blade line (plow zone) would all be disturbed. Ms. Tumamait-Stennslie requested a Site visit.
- March 28, 2019: Gino Altamirano and Fred Collins of the Northern Chumash Tribal Council, both support the local tribes' recommendations.
- March 28, 2019: Freddie Romero, Santa Ynez Band of Chumash Indians, recommended contacting Julie Tumamait-Stennslie.
- March 28, 2019: Mona Tucker, Yak tityu yak tihini-Northern Chumash Tribe, stated that the area is not within the tribe's territory and recommended consulting with tribes indigenous to Ventura County.

On June 17 and 18, 2019, Ms. Julie Tumamait-Stennslie, Barbareño/Ventureño Band of Mission Indians, was contacted to give her the opportunity to conduct a Site visit. No response was received.

#### **Tribal Cultural Resources and AB 52 Consultation**

Under the California Environmental Quality Act, AB 52 requires a lead agency to evaluate a project's potential to impact "tribal cultural resources." In addition, AB 52 requires the lead agency to consult with any California Native American tribe that has previously requested that the lead agency provide the tribe with notice of such projects and consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. Consultations must include discussing the type of environmental review necessary, the significance of tribal cultural resources, and the significance of the project's impacts on the tribal cultural resources (as applicable), and alternatives and

mitigation measures recommended by the tribe. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. Pursuant to State requirements, Native American consultations should be initiated early in the planning process and should be conducted by the lead State/public agency, if agency consultation has been requested by a California Native American tribe (per Assembly Bill 52, PRC 210803., Section 1.2).

At this time, no tribes have requested formal consultation under AB52 with the District.

### **Phase I Archaeological Survey and Extended Phase I**

On March 21, 2019, Provenience Group, Inc., staff archaeologist surveyed the approximately 49.75-acre project area to identify cultural resources (Appendix D). Most of the project area, with the exception of unimproved access roads, is within an active strawberry field. The area was surveyed using transect intervals that varied between three and ten meters. All transects were surveyed within the pathways between strawberry rows, which were oriented in a north-south direction. The focus of the survey was the level strawberry fields, unimproved access roads, and slopes between the roads and strawberry rows in the central and southern parts of the property. Ground visibility ranged from zero to 20 percent at best throughout the strawberry fields and 90 to 100 percent on the maintained unimproved access roads throughout the property. As a result of the field survey, one isolated piece of marine shell, two sparse historic artifact concentrations, and one sparse marine shell concentration were observed. The two historic concentrations were within a disturbed context (plow zone) and do not possess much research value, and no further work was recommended. The scatter of marine shell, identified as *Chione undatella*, *Protothaca staminea*, and *Argopecten* spp., represent species consumed by aboriginal people living in Ventura County during prehistoric times. Given the presence of these ecofacts, coupled with the poor visibility in the project area due to the active strawberry cultivation throughout the project Site, PGI archaeologists recommended an extended Phase 1 limited archaeological testing of the shell concentration and isolate for the presence or absence of archaeological deposits. On June 19 and 20, 2019, eight shovel test pits were excavated within areas of surface artifact concentrations (Appendix D). The results of the extended Phase I resulted in the recordation of one multicomponent archaeological Site (temporary number OUHS-1). The Site consists of prehistoric ecofacts and historic trash debris. The archaeological testing revealed a disturbed midden marked by shell fragments and a mix of historic and modern debris to a depth of 60 cm. All recovered material was within a disturbed matrix (the plow zone soils). No intact midden or artifacts were recovered from any of the excavated shovel test pits. The historic component of the Site does not appear to be significant because it has been heavily altered or deposited out of context with modern debris. The marine shell distribution demonstrates that intact midden soils were once present but disturbed throughout the more than 100 years of agricultural activity and cultivation. Although no intact midden or artifacts were recovered from any of the shovel test pits during the extended phase I archaeological testing, it is plausible that pockets of intact midden or prehistoric features could still be present in the cultivated field, especially since the current limited excavation was designed to avoid planted areas.

### **3.5.1.2 Regulatory Setting**

There are numerous state regulations and policies that direct management of cultural resources by state and local agencies. The following is a discussion of applicable state and local regulations.

#### **State**

##### **California Environmental Quality Act**

CEQA, California Public Resource Code (PRC) Sections 21083.2 and 21084.1 applies to discretionary projects causing a significant effect on the environment and a substantial adverse change in the significance of a historical or archaeological resource. CEQA requires that historical resources and unique archaeological resources be taken into consideration during the CEQA review process (PRC Section 21083.2). If feasible, adverse effects to the significance of historical resources must be avoided, or significant effects mitigated (State CEQA Guidelines Section 15064.5[b][4]).

CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (PRC Section 21084.1). Section 15064.5(a) (3) of the CEQA Guidelines defines a “historical resource” as a resource that meets one or more of the following:

- Resources listed on or determined to be eligible for listing on the California Register of Historical Resources [CRHR; PRC §5024.1; Title 14, §4852 et seq., California Code of Regulations (CCR)] are those that must be given consideration in the CEQA process.
- A resource listed in a local register of historical resources, as defined in Section § 5020.1(k) of the Public Resources Code (PRC); or
- Identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC; or
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California that may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

In addition, under the CCR, Title 14, Chapter 11.5 and PRC 5024.1 (1), properties listed on or formally determined to be eligible for listing in the National Register of Historic Places (NRHP), and under PRC § 5024.1(2) California Registered Landmarks from No. 770 onward, and under PRC § 5024.1(3) California Points of Interest that have been evaluated by the Office of Historic Preservation and have been recommended to the State of Historical Commission for inclusion on the California Register are automatically eligible for listing in the CRHR. A resource is generally considered to be historically significant under CEQA if it meets the criteria for listing in the CRHR.

#### **California Register of Historical Resources**

Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource is at least 45 years old and meets the criteria for listing on the CRHR (PRC, § 5024.1, and Title 14 CCR, Section 4852) including the following:

1. An association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. An association with the lives of persons important to local, California, or national history.
3. An embodiment of the distinctive characteristics of a type, period, region, or method of construction, or a representation of the work of a master, or possesses high artistic values.
4. A resource that has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

If an archaeological resource does not fall within the definition of a historical resource, it may meet the definition of a “unique archaeological resource” (PRC 21083.2(g)). Unique archaeological resources include archaeological artifacts, objects, or sites that:

- a) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- b) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- c) Is directly associated with a scientifically recognized important prehistoric or historic event or person.



### **Assembly Bill 52**

Assembly Bill (AB) 52 provides for the consideration of tribal cultural resources during the CEQA process by adding or amending the PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 5097.94. This bill specifies that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. The bill requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project prior to determining whether a negative declaration, mitigated negative declaration (MND), or environmental impact report is required for a project. This requirement is applicable if the tribe has requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. The bill also specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. Tribal cultural resources are either of the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
- Included or determined to be eligible for inclusion in the CRHR.
- Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of CRHR, is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

### **California Public Resource Code**

In addition to the PRC sections affected by AB 52, several other sections regulate cultural resources. California PRC Section 5020-5029.5 establishes the criteria for the CRHR, creates the California Historic Landmarks Committee, and authorizes the Department of Parks and Recreation to designate Registered Historical Landmarks and Registered Points of Historical Interest. It also establishes criteria for the protection and preservation of historic resources. Several other sections of the California Public Resource Code also provide protection of cultural resources. Section 5097-5097.6 provides guidance for state agencies in the management of archaeological, paleontological, and historical sites affected by major public works project on state land.

Subsections 5097.9-5097.991 establish regulations for the protection of Native American religious places and establishes the NAHC. They also require that California Native American remains and associated grave artifacts be repatriated and that notification of discovery of Native American human remains be made by the NAHC to a MLD. Subsection 5097.993-.994 establishes fines or both fine and imprisonment for the unlawful excavation, removal, or destruction of Native American archaeological or historic sites on public or private lands.

### **Senate Bill 922**

Senate Bill 922 exempts from California Public Records Act information pertaining to Native American graves, cemeteries, archaeological sites, and sacred places in the possession of the California NAHC and other state or local agencies.

### **Senate Bill 18**

California State Senate Bill 18 (SB18), signed into law in September 2004 and implemented March 1, 2005, requires cities and counties to notify and consult with California-recognized Native American Tribes about proposed local land use planning decisions for the purpose of protecting Traditional Tribal Cultural Places. The Governor's Office

of Planning and Research was mandated to amend its General Plan Guidelines to include the stipulations of SB18 and to add advice for consulting with California Native American Tribes.

***Administrative Code, Title 14, Section 4307***

Administrative Code, Title 14, Section 4307 prohibits individuals from removing, injuring, defacing, or destroying any object of paleontological, archaeological, or historical interest or value.

***Government Code, Sections 6253, 6254, and 6254.10***

Government Code, Sections 6253, 6254, and 6254.10 states that disclosure of archaeological site information is not required for records that relate to archaeological site information maintained by the Department of Parks and Recreation, the State Historical Resources Commission, or the State Lands Commission.

***Penal Code, Title 14, Section 622.5***

Penal Code, Title 14, Section 622.5 establishes as a misdemeanor offense for any person, other than the owner, who willfully damages or destroys archaeological or historic features on public or privately-owned land.

***California Health and Safety Code, Section 7050.5-7052 and 8010-8011***

Several sections of the California Health and Safety Code provide protection of human remains. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC within 24 hours. Section 7052 of the Health and Safety Code states that it is a felony to disturb Native American burials. Section 8010-8011 establishes a state repatriation policy to ensure that all California Indian human remains and cultural items are treated with dignity and respect and encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California.

***California Code of Regulations, Section 1427***

California Code of Regulations, Section 1427 recognizes that California's archaeological resources are endangered by urban development and that these resources need preserving. This section establishes as a misdemeanor the willful injury, disfigurement, defacement, or destruction of any object or thing of archaeological or historical interest or value by someone who is not the owner, whether situated on private lands or within any public park or place. It also states that it is a misdemeanor to alter any archaeological evidence found in any cave, or to remove any materials from a cave.

***Senate Concurrent Resolution Number 43***

Senate Concurrent Resolution Number 43 requires all state agencies to cooperate with programs of archaeological survey and excavation, and to preserve known archaeological resources whenever reasonable.

**Local**

***City of Oxnard Regulations***

The following goals and policies in the City of Oxnard California General Plan, Goals & Policies (City of Oxnard 2011a) identifies goals and policies pertaining to cultural resources within the City. The following summarizes the requirements for compliance with the City policies that may be applicable to the proposed project.

**Goal ER 11** Protect the City's cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible. The following policies apply to Goal ER 11:

**ER-11.1 Archaeological Resource Surveys.** Requires a qualified archaeologist to perform a cultural resources study prior to project approval. Inspection for surface evidence of archaeological

deposits, and archaeological monitoring during grading should be required in areas where significant cultural resources have been identified or are expected to occur.

- ER-11.2 Requires Mitigating the Impact of New Development on Cultural Resources.** Ensures that alternatives are considered, including planning construction to avoid archeological sites, deeding archaeological sites into permanent conservation easements, and planning parks, greenspace, or other open space to incorporate archaeological sites in the event that development threatens significant archaeological resources.
- ER-11.3 Development Applicants to Conduct Research.** Requires project applicants to have a qualified archaeologist conduct a record search at the South Central Coast Information Center located at California State University Fullerton and other appropriate historical repositories, conduct field surveys where appropriate, and prepare technical reports, where appropriate, meeting California Office of Historic Preservation Standards (Archaeological Resource Management Reports) prior to project approval.
- ER-11.4 Historic Preservation.** Support public and private efforts to preserve, rehabilitate, and continue the use of historic structures, sites, and districts. Where applicable, preservation efforts shall confer with the Ventura County Cultural Heritage Board and conform to the current Secretary of the Interior's Standards for Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building and the California Office of Historic Preservation.
- ER-11.5 State Historic Building Code for Adaptive Reuse.** Utilize, when possible, the State Historic Building Code for historic properties to encourage adaptive reuse.
- ER-11.6 Identification of Archaeological Resources.** In the event that archaeological/ paleontological resources are discovered during site excavation, continue to require that grading and construction work on the project site is suspended until the significance of the features can be determined by a qualified archaeologist/paleontologist.
- ER-11.7 Native American Remains.** Requires compliance with State laws relating to the disposition of Native American burials consistent with the CEQA Guidelines (Section 15064.5) if human remains of possible Native American origin are discovered during project construction.
- ER-11.8 Historical Resource Inventory.** Maintain a historical resource inventory, discourage demolition or alteration of historical buildings unless they are declared unsafe, and strongly encourage rehabilitation and/or adaptive reuse.

## 3.5.2 Impact Analysis

### 3.5.2.1 Methodology

The methodology for identifying historic resources within the project Site include a record search, NAHC sacred lands search and tribal outreach, and a Phase I archaeological survey and Extended Phase I archaeological testing (Appendix D).

### 3.5.2.2 Significance Thresholds

The thresholds for cultural and tribal cultural resources impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

- *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*
- *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*
- *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or 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:*
  - i) *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*
  - ii) *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 the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

### 3.5.2.3 Project Impacts

#### ***Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?***

The proposed project Site lacks any buildings or structures and is currently used for agriculture row crops. The records search and NAHC sacred lands search did not identify any known historical resources within or adjacent to the project APE. The Phase I archaeological survey and Extended Phase I limited archaeological testing did not identify any historic resources pursuant to Section 15064.5, therefore the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

#### ***Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?***

The records search, NAHC sacred land search, and tribal outreach did not identify any archaeological sites within or adjacent to the project APE. The Phase I archaeological survey and Extended Phase I limited archaeological testing identified a multicomponent archaeological site (OUHS-1). Based on the archaeological testing, all recovered artifacts were recovered from disturbed soils (plow zone: 0-60 centimeters). Although no intact midden or artifacts were recovered from any of the shovel test pits during the extended phase I archaeological testing, it is plausible that pockets of intact midden or prehistoric features could still be present below the subsurface disturbance zone. The project Site is located in an active alluvial depositional setting, and buried, intact, archaeological (prehistoric or historic) materials may be present in previously undisturbed native soils beneath the disturbance. Disturbance of these intact buried resources would be a significant impact. Incorporation of Mitigation Measures CUL-1 (Worker Environmental Awareness Training) and CUL-2 (Archaeological Monitoring), below, would reduce the potential impact on archaeological resources to less than significant.

#### ***Would the project disturb any human remains, including those interred outside of dedicated cemeteries?***

There are no known human remains or burials within the project APE. The record search nor the NAHC sacred land file search identified any known burials or recorded human remains. Tribal outreach indicated the area is sensitive for tribal cultural resources, including burials. As with archaeological resources, it is possible that previously unknown human burials or remains could be disturbed on site during project construction. As discussed above, human occupation within the Oxnard Plain has been documented to at least 5000 years ago and likely include the project APE.

California state law requires all project excavation activities to halt if human remains are encountered and the County Coroner must be notified. Any discovery of human remains on the project Site would be treated in accordance with PRC Section 5097.98 and Section 7050.5 of the State Health and Safety Code. Pursuant to State HSC § 7050.5, if human remains and/or cultural items defined by the Health and Safety Code, Section §7050.5, are inadvertently discovered during construction activities, all work within a 100-foot radius of the find or an area reasonably suspected to overlie adjacent remains (whichever is larger) will cease, the find will be flagged and protected for avoidance, and the Ventura County Coroner will be contacted immediately. The remains must be securely protected, and project personnel must ensure confidentiality of the find on a need-to-know basis and ensure that the remains are treated with dignity, not touched, moved, photographed, discussed on social media sources (e.g., Facebook, Twitter), or further disturbed. If the remains are found to be Native American as defined by Health and Safety Code, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours. The NAHC shall immediately notify the person it believes to be the MLD as stipulated by California PRC Section 5097.98. The MLD(s), with the permission of the landowner and/or authorized representative, shall inspect the Site of the discovered remains and recommend treatment regarding the remains and any associated grave goods. The MLD shall complete their inspection and make their recommendations within 48 hours of notification by the NAHC. Construction will not proceed within the 100-foot area (or protected area) around the discovery until the appropriate approvals are obtained. Work may be delayed in the vicinity of the human remains up to 30 days.

The specific State law/regulations regarding proper handling of previously unknown human remains encountered during construction are specified above and the project will comply with the state law/regulations to avoid significant impacts on human remains. In conjunction with the training and monitoring protocols identified in Mitigation Measure CUL-1 and CUL-2, potential impacts to unknown human remains is less than significant.

***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or 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:***

***i) 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***

The records search, NAHC sacred lands search, and tribal outreach did not identify any historical resources within the project area. As a result, it is believed the proposed project would not cause a substantial adverse change in the significance of a known historic resource as defined in PRC 5020.1 (k) and no mitigation is required.

***ii.) 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 the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

The records search, NAHC sacred lands search, and tribal outreach did not identify any significant tribal cultural resources within the project area. Tribal outreach conducted by PGI indicates that the project region is sensitive for tribal cultural resources. As noted above, the project Site is located in an active depositional setting, and buried, intact, tribal cultural resources may be present in previously undisturbed soils beneath the disturbance zone. Disturbance of these intact buried resources would be a significant impact. Incorporation of Mitigation Measures CUL-1 (Worker Environmental Awareness Training) and CUL-2 (Archaeological Monitoring), below, would reduce the potential impact on tribal cultural resources to less than significant.

### 3.5.2.4 Cumulative Impacts

Based on the literature and records review (as described above), the project Site is in a part of coastal California with documented prehistoric and historic occupation. The cumulative impact study area for cultural resources is



coastal Ventura County and the Channel Islands (specifically, the Oxnard Plain), covering areas occupied by Native Americans through historic contact and immigrant populations (e.g., Europeans, Mexicans). Although no significant historic or archeological resources are documented in the project area, unidentified buried resources may exist. Varied cultural resources are documented throughout this part of coastal California suggesting it is a highly sensitive region for archaeological resources.

The proposed project is located on the east and north sides of the historic Maulhardt Property, which was previously recommended eligible for the National Register of Historic Places, California Register of Historical Resources (California Register) and as a Ventura County Landmark by San Buenaventura Research Associates in 2014. Cumulative indirect visual impacts of the project, which have the potential to visually alter the characteristics of the historic ranch buildings and diminish their integrity, will require mitigation. PGI recommends mitigation that will entail planting a thick row of tall trees and bushes along the east and north sides of the existing historic buildings present on the Maulhardt Property to visually obscure the school complex from the historic ranch buildings.

The proposed project could result in cumulative indirect visual impacts to ranch buildings present on the Maulhardt Property that have been previously documented as a historic resource. Impacts to archaeological resources, historic resources other than the identified ranch buildings present on the Maulhardt Property, and human burials are not anticipated, however impacts could occur to undocumented resources as a result of disturbance of native soils during project construction. With the implementation of Mitigation Measures CUL-1 through CUL-3, project impacts on cultural and tribal cultural resources would be reduced to less than significant.

### 3.5.2.5 Mitigation Measures

The following Mitigation Measures will be implemented for the proposed project.

**CUL-1 Worker Environmental Awareness Training:** Prior to any proposed construction ground disturbing activities within the project APE, the District Project Manager shall require the construction contractor to provide for all non-cultural resources personnel to be briefed, by a qualified project archaeologist (retained on-call by construction contractor) about the potential and procedures for an inadvertent discovery of prehistoric and historic archaeological resources. In addition, the training will include established procedures for temporarily halting or redirecting work in the event of a discovery, identification and evaluation procedures for finds, and a discussion on the importance of, and the legal basis for, the protection of archaeological resources. Personnel will be given a training brochure/handout regarding identification of cultural resources, protocols for inadvertent discoveries, and contact procedures in the event of a discovery.

**CUL-2 Archaeological Monitoring Plan and Monitoring:** Should project construction ground disturbing activities reach depths containing undisturbed native soils (below 60 inches), then an archaeological monitoring plan and monitoring will be required. A qualified project archaeologist shall prepare an archaeological monitoring plan and a qualified archaeological monitor and Native American monitor (if requested) will be present on-Site during ground disturbing activities that occur within native soils. If any cultural resources are identified by the monitor(s) during ground disturbing activities, the resource will be treated as an inadvertent discovery and the protocols outlined in the monitoring plan will be adhered to. In general, if cultural resources are encountered during ground disturbing activities in native soils, the archaeological monitor will stop work within 100-feet of the find in order to assess its significance. Construction activities can continue outside the established 100-foot radius exclusion zone. Work may not resume within the 100 feet exclusion zone until the project archaeologist can evaluate the significance of the find and complete any necessary recordation and evaluation of the find (may include recording, testing and/or data recovery efforts) in consultation with the District. Construction will not proceed within the 100-foot area around the discovery until the appropriate approvals are obtained. If requested by interested Tribes, a Native American Monitor will also be present during construction ground disturbing activities. A final report documenting the results of the monitoring program will be prepared by the qualified project archaeologist.

**CUL-3 Maulhardt Property Landscaping Treatment Plan:** To shield the view of the existing historic buildings present on the Maulhardt Property that will remain in place from the proposed development, a landscaping treatment plan (design) will be required. The landscape design will be implemented to the north and east of the existing historic buildings present on the Maulhardt Property that will remain in place, and include planting of vegetation such as a row of tall trees and bushes to visually obscure the school complex from the historic ranch buildings. The design will follow the guidelines set forth in the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (NPS 2017). Before final approval, the proposed landscape design will be reviewed by a qualified architectural historian professional(s) to ensure the design meets the Secretary of the Interior's Standards and Guidelines.

### **3.5.2.6 Level of Impact After Mitigation**

Based on implementation of, and compliance with, Mitigation Measures CUL-1, CUL-2, and CUL-3, the potential impacts of the proposed project on cultural resources, tribal cultural resources, and human remains (protocols per PRC Section 5097.98 and Section 7050.5 of the State Health and Safety Code) would be reduced to less than significant.

## 3.6 ENERGY

This section describes the proposed project's potential to affect energy resources. Sustainment of day to day operations within communities relies significantly in the availability and use of energy which comes in many renewable and nonrenewable forms including electricity, natural gas, gasoline, diesel, jet fuel, solar, and wind. The efficient use and reduction of energy is closely related to air and greenhouse gas reductions. Thus, efforts to curtail emissions of air emissions and GHG in many ways contribute to the efficient use and reduction of energy consumption.

### 3.6.1 Environmental Setting

#### 3.6.1.1 Existing Conditions

The City of Oxnard has a moderate climate that reduces the need for energy use for space cooling and heating needs for human comfort. This moderate weather is also conducive to the use of alternative modes of transportation such as walking and biking, which lead to reduced consumption of fuel and electricity that would otherwise be used by vehicles (e.g., cars and motorcycles) that would be used to transport people between destination points. California is among the states with the lowest energy consumption per capita, ranking at 48 with 199 million British Thermal Units per capita (U.S. Energy Information Administration 2017).

#### 3.6.1.2 Regulatory Setting

##### Federal

Energy used in the United States comes primarily from fossil fuels (i.e., petroleum, coal, and natural gas) and is primarily consumed in five sectors: electric power, transportation, Industrial, residential, and commercial (U.S. Energy Information Administration 2017).

The U.S. EPA plays a key role in the conservation and efficient use of energy in the United States. In this regards the U.S. EPA has established renewable energy and energy efficiency programs aimed at reducing energy use in all sectors and providing technical information for state policy makers and energy providers. U.S. EPA renewable energy programs include AgStar (promotes the use of biogas recovery systems to reduce methane emissions from livestock waste), Combined Heat and Power Partnership (a voluntary program aimed at reducing environmental impact of power generation), and Green Power Partnership (a voluntary program that encourages organizations to use green power). Energy efficiency programs include ENERGY STAR, a joint program of the U.S. EPA and the Department of Energy. ENERGY STAR certifies energy efficient products (e.g., detergents and appliances), techniques for energy savings at home, certifies energy efficient new homes, and provides energy strategies for buildings and plants.

##### State

The California Energy Commission (CEC) is the State's regulatory agency responsible for creating energy policy and planning for the State's Energy System as a whole. Core responsibilities of the CEC consists of achieving energy efficiency, advancing state energy policy, developing renewable energy, investing in energy innovation, overseeing energy infrastructure, preparing for energy emergencies and transforming transportation.

The CEC is also working with other agencies to implement the Clean Energy and Pollution Reduction Act, Senate Bill 350, which establishes clean energy, clean air, and GHG reduction goals. SB 350 establishes a goal to increase California's renewable energy procurement from 33 percent by 2020 to 50 percent by 2030. To this end, the CEC has deployed its Renewable Portfolio Standard (RPS) for the advancement of renewable energy. The RPS requires all load-servicing entities in California to produce a portion of their electricity sales from eligible renewable resources certified by the CEC. SB 350 also requires the state to double energy statewide energy savings in electricity and

natural gas by 2030. SB 350 also requires state agencies to conduct studies to identify and assess barrier to, and opportunities for, sola photovoltaic energy generation (California Energy Commission 2019).

The state of California's energy efficiency efforts associated with construction of buildings are codified in Title 24 of the CCR. The CEC provides guidance for the implementation of the building energy efficiency standards through the 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings.

Appliance efficiency regulations are codified in Title 20 of the CCR. California's Appliance efficiency regulations set minimum efficiency levels for consumer electronics, household appliances and plumbing equipment. Manufacturers of regulated appliances are required to energy and water efficiency state or federal standards and certify appliance performance. This information is available to the public through the Modernized Appliance Efficiency Database.

### Local

The City of Oxnard has developed the Energy Action Plan (EAP) pursuant to the reduction of energy consumption and increase of renewable energy production. The EAP establishes an overall realistic net energy consumption reduction target and scope intended to gradually reach this target. The EAP establishes energy conservation and production programs consistent with 2030 General Plan Goals and policies.

The City of Oxnard General Plan provides various goals and policies related to energy generation and increased efficiency. Some of the policies prescribed in the General Plan that are applicable directly and indirectly to the proposed project are listed in Table 3-10.

**Table 3-10.** City of Oxnard Goals and Policies Applicable to the Proposed Project

Goals/ Policies No.	Title	Description
SC-3.8	Require Use of Passive Energy Conservation Design	As part of the City and Community EAP's, require the use of passive energy conservation by building material massing, orientation, landscape shading, materials, and other techniques as part of the design of local buildings, where feasible.
SC-3.9	Promote Voluntary Incentive Programs	Promote voluntary participation in incentive programs to increase the use of solar photovoltaic systems in new and existing residential, commercial, institutional and public buildings, including continued participation in the Ventura County Regional Energy Alliance (VCREA).
SC-3.12	Encourage Natural Ventilation	Review and revise applicable planning and building policies and regulations to promote use of natural ventilation in new construction and major additions or remodeling consistent with Oxnard's temperate climate.
SC-4.1	Green Building Code Implementation	Implement the 2010 California Green Building Code as may be amended (CALGREEN) and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.

Goals/ Policies No.	Title	Description
SC-5.4	Coordinate with Local Utility Providers and VCREA	Coordinate with local utility providers and the Ventura County Regional Energy Alliance (VCREA) to promote public education and energy conservation programs to increase the use of solar photovoltaic systems and other technology in new and existing residential, commercial, institutional and public buildings.
ICS-8.8	Educational Facilities	Coordinate with public school districts and other educational facilities to design pedestrian and bicycle access as the preferred access to schools rather than vehicular, and improve drop off and pick up circulation, especially during the morning and afternoon peak periods.
ICS-11.7	Water Wise Landscapes	Promote water conservation in landscaping for public facilities and streetscapes, residential, commercial and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new and replacement landscaping.
ICS 11.12	Water for Irrigation	Require the use of non-potable water supplies for irrigation of landscape whenever available.
CD-7.12	Urban Village Collocation with Schools	Promote the collocation of parks with school facilities for the purpose of enhancing available open space and recreation.
CD-7.13	Urban Village Trail and Open Connections	Include trails (pedestrian and bicycle) and open space areas, where feasible within urban village areas. These facilities shall create a network that links urban villages and other neighborhoods to each other.

Source: City of Oxnard 2011a

## 3.6.2 Impact Analysis

### 3.6.2.1 Methodology

Methodology employed in this energy analysis is based on review of Federal, State and local regulations pursuant to energy use assessment criteria prescribed by the CEQA Guidelines. The following sections provide a description of the methodology employed for the impact analysis associated with energy use in the construction and operation of the proposed project.

### 3.6.2.2 Significance Thresholds

The thresholds for energy impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*



### 3.6.2.3 Project Impacts

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

The proposed project is intended to provide educational services needed for existing and future students in the neighboring area. The proposed project is adjacent to agricultural land to the north and a fully developed residential development to the west, housing development and an elementary school to the east, and housing and commercial developments to the south. The proposed project is designed to comply with California requirements for energy conservation standards codified in CCR Title 24, Part 6.

#### **Short-Term Energy Use**

The construction phase is temporary, and it ends once the proposed project is built and construction activities are completed. During the construction phase energy consumption will result primarily from fuel used to power off-road construction equipment, material delivery and removal trucks, and vehicles used by employees to travel to the job Site. Construction equipment and trucks would be subject to applicable regulations which include anti-idling measures and use of efficient engines. These measures would prevent the unnecessary use of energy and inefficient equipment. There are no identified aspects of the proposed project that would incur in unnecessary or inefficient use of energy. Thus, the construction of the proposed project is not anticipated to result in wasteful, inefficient or unnecessary use of energy.

#### **Long-Term Energy Use**

The proposed project will require energy to conduct day to day operations. Energy consumption at the project Site will result from the use of electricity and natural gas use to power various assets including appliances, equipment, light fixtures, landscape controls and equipment. Energy consumption will also result from vehicles such as delivery trucks, school buses, and personal owned vehicles used by school staff and to drop off and pick up students.

The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient light-emitting diode (LED) lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The Site parking lot and pathway pole-mounted lighting and sports field lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the project will be an energy-efficient type complying with the most recent energy code.

Energy use by the proposed project was calculated using CalEEMod and would occur at a rate of 3.33 Giga British Thermal Units per year for natural gas use and 1.45 Giga Watt-hour per year for electricity use.

Given the proximity of the proposed project to the surrounding housing developments, vehicle trips associated with drop off and pick up of students would likely be minimized as students walk to school. Thus, energy minimization associated with minimized and/or shorter vehicle trips is likely to result.

No unnecessary consumption of energy resources is anticipated during operation of the proposed project.

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

The proposed project design is consistent with the City of Oxnard Energy Action Plan which implements 2030 General Plan goals and strategies. Thus, the proposed project is not anticipated to obstruct a state or local plan for renewable energy or energy efficiency.

#### **3.6.2.4 Cumulative Impacts**

Energy use by the proposed project will contribute to energy use by existing and future users (e.g., housing and businesses). Significant cumulative impacts on energy use would result if operation of the proposed project and existing and future projects incur inefficient and wasteful uses of energy. As mentioned above, the efficient use and reduction of energy use is closely related to air and greenhouse gas reductions. Thus, efforts to curtail air emissions and GHG in many ways contribute to the efficient use and reduction of energy consumption. The proposed project is designed to comply with California requirements for energy conservation standards codified in CCR Title 24, Part 6 and is not expected to have significant cumulative impacts resulting in wasteful and inefficient use of energy.

#### **3.6.2.5 Mitigation Measures**

No Mitigation Measures are provided for the reduction of energy usage associated with the proposed project.

#### **3.6.2.6 Level of Impact After Mitigation**

No Mitigation Measures are required; project impact would be less than significant.

### 3.7 GEOLOGY AND SOILS

This section provides a discussion of existing geologic and soils conditions and an analysis of potential impacts from implementation of the proposed project. Section 3.7 also addresses the potential for structural damage due to the underlying local geology, potential ground settlement, expansive soils, and regional seismic hazards. This section summarizes information provided in the following:

- *Preliminary Foundation Design Parameters and Infiltration Testing Report* (Earth Systems Pacific [ESP] 2018a);
- *Geohazard Assessment/Geotechnical Investigation, High School No. 8. APN 214-002-059 on North Rose Avenue, Oxnard, California* (Tetra Tech 2018a) (Geohazard Assessment/Geotechnical Investigation);
- *Second Addendum, Geohazard Assessment/Geotechnical Investigation, High School No. 8. APN 214-002-059 on North Rose Avenue, Oxnard, California* (Tetra Tech 2019a) (Second Addendum, Geohazard Assessment/Geotechnical Investigation); and
- *Geotechnical Engineering Report, Oxnard High School No. 8, Northeast of Camino Del Sol and North Rose Avenue, Oxnard, California* (ESP 2018a) (Geotechnical Engineering Report).

The Geohazard Assessment/Geotechnical Investigation (Tetra Tech 2018a), Second Addendum, Geohazard Assessment/Geotechnical Investigation (Tetra Tech 2018a), and Geotechnical Engineering Report (ESP 2018a) were performed in accordance with Sections 17212 and 17212.5 of the California Education Code (CEC), the 2016 California Building Code (CBC) (International Code Council 2016 [ICC] 2017) as described in the CCR Title 24, and California Department of Conservation, California Geological Survey (CGS) Note 48 (Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings (CGS 2013). The CGS concluded that the information presented in the Geohazard Assessment/Geotechnical Investigation (Tetra Tech 2018a), Second Addendum, Geohazard Assessment/Geotechnical Investigation (Tetra Tech 2018a), and Geotechnical Engineering Report (ESP 2018a), had adequately addressed the engineering geology and seismology issues at the Site and no further information was requested (CGS 2019). The Geohazard Assessment/Geotechnical Investigation (Tetra Tech 2018a), Second Addendum, Geohazard Assessment/Geotechnical Investigation (Tetra Tech 2018a), and Geotechnical Engineering Report (ESP 2018a) are included in Appendix E of the EIR.

As noted in the Initial Study (Appendix A), impacts associated with the Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist, Seismic-related ground failure, including liquefaction, Landslides, lateral spreading, subsidence, liquefaction, or collapse, and expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) were found to have a less than significant impact and are not discussed in detail in the EIR. Impacts associated with soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of waste water were found to have no impacts and are not discussed in detail in the EIR.

#### 3.7.1 Environmental Setting

The project Site is relatively flat, and slopes gently to the south and southwest, with surface elevations ranging from approximately 60 to 65 feet amsl. The project Site is currently being used for agricultural production of strawberries and contains sparse non-native vegetation at the margins (weeds and grasses). A row of eucalyptus trees is located along the western boundary of the project Site along North Rose Avenue.

The proposed project is located on the Oxnard Plain area of Ventura County. The Oxnard Plain is part of the Ventura Basin which is bounded on the north by the Santa Ynez-Topatopa Mountains and on the south by the Channel Islands, the western Santa Monica Mountains, and the Simi Hills. To the east, the basin is bounded by the San Gabriel fault zone. To the west, the Santa Barbara Channel separates the offshore islands from the mainland. Near

the Santa Barbara Channel, the Ventura Basin is a transitional zone consisting of a coastal plain and shoreline. The coastal plain is composed of a broad alluvial plain, some of which forms estuaries and lagoons.

Based on the Ventura County Geologic Map for the Oxnard Quadrangle, the Site is underlain by Holocene alluvial fan deposit composed predominantly of alluvial clay, sand, and gravel deposits (Gutierrez et al. 2008).

### 3.7.1.1 Existing Conditions

The Site is located in the Oxnard Plain of the Ventura Basin. The Ventura Basin, including its offshore continuation into the Santa Barbara Channel, is filled with a thick sequence of Cenozoic sedimentary rocks estimated to be more than 20,000 feet in total thickness. Major east trending folds and reverse faults reflect regional north-south compression and are characteristic of the basin (Norris and Webb 1990). The Oxnard Plain is underlain by several thousand feet of Pleistocene-age sediments of the San Pedro Formation. The San Pedro Formation consists of marine and continental deposits of clay, silt, and gravel (Turner and Mukae 1975). The predominant surface materials in this region include Pleistocene to Recent age alluvial, floodplain, and near-shore deposits, some of which have been uplifted, folded, and faulted.

The geology of the Site subsurface was determined from the geotechnical soil boring logs in ESP's 2018 Geotechnical Engineering Report (ESP 2018a). Based on the geologic map by Gutierrez, et al. 2008 and information in *Ventura County Water Resources Management Study, Geologic Formations, Structure and History in the Santa Clara-Calleguas Area* (Turner and Mukae 1975), the Site is underlain at the ground surface by Holocene deltaic alluvium and wash fan deposits composed of alluvial clay, sand, and gravel deposits to approximately 70 feet below ground surface (bgs). These are conformably underlain by upper Pleistocene alluvial sand, gravel deposits to approximately 400 feet bgs, and the marine–non-marine clays and gravels of the Lower Pleistocene San Pedro formation to approximately 2,000 feet bgs.

ESP completed 53 geotechnical soil borings to depths ranging from 10 feet bgs to 51.5 feet bgs during April and July 2018 (ESP 2018a; 2018b) for the OUHSD to collect soil samples and soil blow-count density data for use in development of the High School No. 8. The general subsurface profile observed in the borings consisted of silty sand at the ground surface extending to approximately 3 to 8 feet bgs, underlain by interbedded poorly to well graded sand and occasional gravel with clay and silt layers that are exposed in the borings completed for this project to 51.5 feet bgs. These alluvium and wash deposits were deposited by the Santa Clara River. Groundwater was encountered at depths ranging from approximately 20 to 25 feet bgs in the deeper borings completed for this project. The soils were in a slightly moist to moist condition above the water table and wet below the water table. The sandy soils have a loose to very dense consistency while the silt and clay soils were medium stiff to stiff. Several of these soil layers also had varying amounts of fine to coarse gravel and cobbles. Based on the subsurface profile described above, the Site Class per Chapter 20 Table 20.3-1 (American Society of Civil Engineers [ASCE] 2013) is “D”, a “Stiff Soil Profile” (ESP 2018a). Please refer to the boring logs and CPT data included in Appendix A of ESP's Geotechnical Engineering Report (ESP 2018a) (Appendix E).

The Site is located in the northern portion of the Oxnard Plain Pressure Basin within the Santa Clara River Hydrologic Unit (Turner and Mukae 1975; Ventura County Public Works Agency [VCPWA] 1975). The Oxnard Plain Basin is a relatively flat alluviated area, which ranges in elevation from sea level to approximately 100 feet. The water bearing zones of the Oxnard Plain Basin are grouped into three major units; 1) the semi-perched aquifer and clay cap, 2) the Upper Aquifer System (UAS), and 3) the Lower Aquifer System (LAS).

The semi-perched aquifer and clay cap consists of all of the alluvial materials above the Oxnard aquifer. In the Site area, the semi-perched aquifer extends to depths of approximately 75 feet bgs and the clay cap from approximately 75 feet bgs to 150 feet bgs (Turner and Mukae 1975). The semi-perched aquifer consists primarily of geologically Recent-aged stream deposited sands and gravels with minor silt and clay interbeds. Sand and gravel deposits are generally parallel to the deltaic channel complex of the ancestral Santa Clara River and form lenses perpendicular to the channels of the ancestral Santa Clara River. The depth to the historically highest groundwater elevation for the Site area shown on Plate 1.2 of the *Seismic Hazard Zone Report for the Oxnard 7.5-Minute Quadrangle, Ventura*

*County, California* (CGS 2002a) is approximately 8 feet bgs. The “clay cap” underlies the semi-perched groundwater zone separating it from the underlying Oxnard aquifer of the UAS. This clay cap acts as an aquitard. Based on topographic controls, groundwater in the Site vicinity is expected to flow toward the south to south-southwest.

The UAS system consists of the Oxnard and underlying Mugu aquifer zones. These two water-bearing units were combined due to their similar, planar structure. Both the Oxnard and Mugu aquifers are composed of sediments deposited largely by the ancestral Santa Clara River during the Upper Pleistocene. The Oxnard aquifer zone extends from approximately 150 to 200 feet bgs in the Site area and is a laterally continuous layer gravel and cobbles and coarse to fine sand, with local fine-grained lenses deposited in non-marine environment. The underlying Mugu aquifer zone extends from approximately 200 to 400 feet bgs in the Site area and consists of laterally continuous sand and gravel deposited in a shallow marine embayment on an erosional unconformity on top of the San Pedro formation that forms the top of the LAS.

The LAS system in the Site area, in descending order, consists of the Hueneme and Fox Canyon aquifer zones. The sediments in the LAS are more structurally complex than the UAS resulting from folding and faulting. Both the Hueneme and Fox Canyon aquifer zones are composed of lower Pleistocene age San Pedro Formation.

No surface water was observed at the Site during the reconnaissance performed on July 2, 2018. It is likely that during periods of moderate rainfall, free surface water that accumulates on the Site may flow south and southwest and possibly into gutters along Camino Del Sol and North Rose Avenue (Figure 2-2). However, the U.S. Department of Agriculture, Soil Conservation Service report indicates that soil permeability at the Site is moderate to rapidly moderate and surface runoff is very slow, such that there is a low hazard of erosion by water (USDA Soil Conservation Service 1970).

The high rate of seismic activity in California and the Site area is the result of large-scale earth processes in which the Pacific plate slides northwestward relative to the North American plate at about 2 inches/year. This plate motion results in horizontal slip (primarily on the San Andreas “strike-slip” fault) and crustal block rotation and compression within a restraining bend of the San Andreas Fault, that has created the series of the prominent mountain ranges and intervening valleys situated between Santa Monica and Santa Barbara and associated thrust and reverse faults (CGS 2002). Although slower moving than the strike-slip faults of the San Andreas system, these numerous thrust and reverse faults account for over half of the significant earthquakes that have occurred in southern California during the past century, including the damaging 1971 M 6.6 San Fernando, 1994 M 6.7 Northridge, and 2003 M 6.5 San Simeon earthquakes (Ross et al. 2004).

Active and potentially active faults in the Site area were evaluated by reviewing the Fault Activity Map of California and Adjacent Areas (Jennings 1994), Map No. 0-6 California Geological Survey 150th Anniversary Fault Activity Map of California (Jennings et al. 2010), Draft Background Report, City of Oxnard General Plan (City of Oxnard 2006), Figures 2.2.1b, 2.2.2 and 2.2.3b of the Ventura County General Plan, Hazards Appendix (County of Ventura 2013), and Earthquake Zones of Required Investigation Maps for the Saticoy Quadrangle (CDMG 1978), Camarillo Quadrangle (CGS 2002), and Santa Paula Quadrangle (CDMG 1998; CGS 2002). Active faults are defined as those faults with evidence of displacement within the last 11,000 years and potentially active faults are defined as those with evidence of displacement within the last 1.6 million years (CGS 2007). The terms active and inactive faults have been interpreted differently by geologists, seismologists, and agencies. For this report, active faults are defined as having evidence of surface displacement within the last 11,000 years and potentially active faults are defined as having evidence of surface displacement in the last 1.6 million years (CGS 2007).

The earthquake faults located nearest to the Site are the Springville Fault, located approximately 5.4 kilometers (km; 3.3 miles) east of the Site, the Wright Road Fault, located approximately 6.1 km (3.7 miles) north of the Site, the Oak Ridge Fault, located approximately 7.3 km (4.5 miles) north of the Site, the Camarillo Fault located approximately 8.3 km (5.1 miles) east of the Site, and the Ventura-Pitas Point Fault, located approximately 8.9 km (5.5 miles) north of the Site (Jennings et al. 2010).



The rate of seismic activity for the Site areas was estimated from the USGS Earthquake Hazards Program Search Earthquake Catalogue website for the Site area from 1900 through 2018 (USGS 2018a). According to the USGS database, 119 earthquakes with magnitudes exceeding 4.5 have occurred within 63 miles (100 kilometers) of the Site since 1900. Significant historical earthquakes of the Oxnard region include the 1812 earthquake that effected most of southern California (Richter Magnitude [ML] 7.0), the 1827 Ventura Earthquake (ML 7.0), the 1857 Fort Tejon Earthquake (ML 7.1), the 1952 Tehachapi Earthquake (ML 7.7), and the 2004 Northridge Earthquake (ML 6.7). While all of these earthquakes were felt in the Site area, no historical earthquakes have caused a great amount of property damage or loss of human life in the Site area. However, the historical earthquake record of California spans a little over 200 years and provides only a partial indication of seismic hazards. The absence of earthquakes on many recognized active faults and fault-related folds in California probably reflects recurrence intervals greater than the historical record.

### 3.7.1.2 Regulatory Setting

#### Federal

No federal regulations or policies relating to geology and soils are applicable to the proposed project.

#### State

##### ***Alquist-Priolo Earthquake Fault Zoning Act (1972)***

The Alquist-Priolo Earthquake Fault Zoning (AP) Act (AP, Public Resources Code, Section 2621, et seq.) was passed into law following the destructive February 9, 1971 Mw 6.6 San Fernando earthquake. The AP Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the AP Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. There are no Earthquake Fault Zones established at or in the near vicinity of the Site, and procedures and regulations as recommended by the CGS for investigations conducted in such zones do not specifically apply.

##### ***Seismic Hazard Mapping Act (SHMA) (1990)***

Adopted by the state for the purpose of protecting public safety from the effects of earthquake hazards from non-surface fault rupture. The CGS prepares and provides local governments with seismic hazard zones maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazards zones are referred to as “zones of required investigation” because Site-specific geological investigations are required for construction projects located within these areas. Before a project can be permitted, a geologic investigation, evaluation, and written report must be prepared by a licensed geologist to demonstrate that proposed buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy must be set back from the fault (generally 50 feet [ft]). In addition, sellers (and their agents) of real property within a mapped Seismic Hazard Zone must disclose that the property lies within such a zone at the time of sale.

##### ***California Building Code (2016)***

CCR Title 24, Part 2, the CBC (ICC 2017), provides minimum standards for building design in the State. Local codes are permitted to be more restrictive than Title 24, but not less restrictive. The procedures and limitations for the design of structures are based on-Site characteristics, occupancy type, configuration, structural system height, and seismic zoning. Seismic ratings from the CBC divide the United States into four geographical zones. Most of central and coastal California, including the project Site, is located in Seismic Zone 4. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in California Occupational Safety

and Health Administration (Cal/OSHA) regulations in California Code of Regulations, Title 8, Chapter 4, Subchapter 4, Article 6 (State of California Department of Industrial Relations 2019).

***California Education Code Sections 17251 and 17212.5, and the California Code of Regulations (CCR), Title 5, sections 14001 through 14012***

These statutes outline the powers and duties of the CDE regarding school sites and the construction of school buildings. Districts seeking state funding must comply with the California Education Code and Title 5 sections cited above. Site approval from the CDE must be granted before the State Allocation Board will apportion funds. Districts using local funds are encouraged to seek the CDE's approval for the benefits that such outside, objective reviews provide to the school district and the community.

***California Geological Survey Note 48 (2013)***

Note 48 is used by the CGS to review the geology, seismology, and geologic hazards evaluated in reports that are prepared under CCR, Title 24, CBC. CCR Title 24 applies to California Public Schools, Hospitals, Skilled Nursing Facilities, and Essential Services Buildings. The building official for public schools is the DSA. Hospitals and Skilled Nursing Facilities in California are under the jurisdiction of the Office of Statewide Health Planning & Development (OSHPD). The CGS serves under contract with these two state agencies.

***California Health and Safety Code. Sections 17922 and 17951–17958.7 of the California Health and Safety Code***

These rules require cities and counties to adopt and enforce the current edition of the CBC (ICC 2017), including a grading section. The City and County have adopted and enforce these provisions. Sections of Volume 2 of the CBC specifically apply to select geologic hazards. Chapter 16 of the 2167 CBC addresses requirements for seismic safety. Chapter 18 regulates excavation, foundations, and retaining walls. Chapter 33 contains specific requirements pertaining to Site demolition, excavation, and construction.

***Unreinforced Masonry Law (1986)***

In California, unreinforced masonry (URM) buildings are generally brick buildings constructed prior to 1933 and predating modern earthquake-resistant design. In earthquakes, the brick walls (especially parapets) tend to disconnect from the building and fall outward, creating a hazard for people below and sometimes causing the building to collapse. The URM Law requires cities and counties within Seismic Zone 4 to identify hazardous URM buildings and to consider local regulations to abate potentially dangerous buildings through retrofitting or demolition, as outlined in the State Office of Planning and Research Guidelines. No URM buildings are located on the project Site.

***Division of the State Architect***

Prior to plan approval, the DSA ensures that structural design of schools complies with the current edition of the Uniform Building Code (UBC) applicable to structure design and construction in order to minimize the potentially damaging effect of severe ground shaking originating from earthquakes in the region.

The DSA also ensures that rough and final grading plans and over-excavation plans incorporate the recommendations of required final geotechnical investigation reports. Recommendations in the final geotechnical report are reflected in the notes on the grading plan and are implemented as conditions of building plan approval.

When a geologic hazard report is required for a project, the report must be submitted to the CGS before the project is submitted to the DSA. Final DSA approval will not occur until the DSA receives the final acceptance letter from CGS. It is the responsibility of the applicant to provide the CGS acceptance letter to the DSA and reference the DSA Application Number for the project.

School districts are responsible for the submittal of the geologic hazard report to the CGS and for the cost of review. Reports should be submitted to the CGS approximately two months prior to submittal of the project to the DSA.

## Local

### **City of Oxnard Regulations**

The OMC adopts the 2016 CBC (ICC 2017) and has additional construction requirements in OMC Chapter 14, Building Regulations that has procedures and limitations for structural design based on seismic risk:

The following policies in the City of Oxnard 2030 General Plan are intended to reduce the potential for geological hazards to adversely affect people and property.

- SH-1.3      Building Code Standards.** Require that all new buildings and alterations to existing buildings be built according to the seismic requirements adopted within the most current City of Oxnard Building Code, or its adopted equivalent.
- SH-1.4      Soil, Geologic, and Structural Evaluation Reports.** Require that adequate soils, and geologic and structural evaluation reports be prepared by registered soils engineers, engineering geologists, and/or structural engineers, as appropriate, for applicable development.
- SH-1.5      Required Geologic Reports.** Continue to require the submission of a geological report for proposed development located in a potential liquefaction area.
- SH-1.7      Soil Investigations.** Continue to require a complete site-specific soils investigation that addresses liquefaction and compressible soil characteristics and identifies construction techniques or other mitigation measures to prevent significant impacts on the proposed development.
- SH-1.8      Mitigating Seismic Hazards.** Where necessary, utilize the expert mitigation measures such as those identified in Special Publication 117: Guidelines for Analyzing and Mitigating Seismic hazards in California (prepared by the Southern California Earthquake Center) to minimize risk associated with seismic activity.

## 3.7.2 Impact Analysis

### 3.7.2.1 Methodology

Tetra Tech and ESP performed a comprehensive assessment of the impacts of the proposed project with respect to geologic and soil conditions (Tetra Tech 2018a; ESP 2018a and 2018b). Their assessment included: a Site reconnaissance, background literature review, site geologic mapping, drilling soil borings to sample soil and log conditions, laboratory tests on-site materials, an engineering analysis, and report preparation.

Soils and geologic and seismic hazards were then assessed based on the significance thresholds identified below.

### 3.7.2.2 Significance Thresholds

The thresholds for geology and soils impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
  - i) *Strong seismic ground shaking?*
- *Would the project result in substantial soil erosion or the loss of topsoil?*
- *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

### 3.7.2.3 Project Impacts

***Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

***i) Strong seismic ground shaking?***

The *City of Oxnard General Plan Draft Background Report* (City of Oxnard 2006) indicates that even though the historic record indicates that no strong earthquakes or surface displacement have occurred along the faults in southern Ventura County in the Site area, the likelihood of the occurrence of one or more of such events within the next 50 to 100 years is not remote.

The Site is in a region of generally high seismicity and has the potential to experience strong ground shaking from earthquakes on regional or local causative faults. According to the 2016 CBC Section 1616A.1.3 (ICC 2017), the Site should be assigned to Seismic Design Category E or F, as the Site's mapped spectral response acceleration parameter at a 1-second period ( $S_1$ ) is 0.938 grams (g), which is greater than 0.75 g. Based on this  $S_1$  parameter, a Site-specific response analysis was performed for the project Site to analyze the ground motion hazard (Tetra Tech 2019a). The Site-specific response analysis is intended to be in general conformance with ASCE Standard 7-10, Chapter 21, Site Specific Ground Motion Procedures for Seismic Design, Sections 21.1.1 through 21.5.3 (ASCE 2013). Per ASCE 7-10 (ASCE 2013) requirements, the following Site-specific seismic information was developed:

1. A Risk-Targeted Maximum Considered Earthquake ( $MCE_R$ ) Probabilistic spectrum peak ground acceleration (PGA) ( $MCE_G$ ) was determined to be 0.943g (includes risk factor), which is the PGA with a 2 percent probability of exceedance within a 50-year period;
2. The Deterministic MRC ( $MCE_R$ ) PGA is 1.03g, which was calculated from the largest source earthquake from the Oak Ridge-Connected-Fault; and
3. Site-Specific  $MCE_R$  is defined by ASCE 7-10, Section 21.2.3 (ASCE 2013) as the lesser of the Probabilistic ( $MCE_R$ ) and the Deterministic ( $MCE_R$ ). In this case, the Probabilistic ( $MCE_R$ ) geometric mean PGA of 0.943g is the Site-Specific  $MCE_R$ .

Therefore, the findings of the Geotechnical Report show that there is the potential for adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

The potential risks posed by the project from strong seismic ground shaking would be less than significant impacts with mitigation incorporated. Mitigation Measure GEO-1 requires that the building design for structures at the project use geotechnical building design recommendations that are based on a Site-specific ground motion hazard analysis for the project Site in accordance with ASCE 7-10 (ASCE 2013) Chapter 21 as modified by Section 1803A.6 of the 2016 CBC (ICC 2017). The Site-specific ground motion hazard analysis and geotechnical building design recommendations shall be approved by the CGS and the DSA. With the implementation of Mitigation Measure GEO-1, the project would have a less than significant impact.

***Would the project result in substantial soil erosion or the loss of topsoil?***

Soil erosion would potentially occur during project construction activities, including Site grading, structure assembly, and utility extension. With the implementation of Mitigation Measure GEO-2, this impact would be reduced to a less than significant level with standard erosion mitigation measures, including the use of hay bales and other erosion control devices as determined by Site-specific conditions, limiting construction to the dry season, soil wetting, and adherence to applicable regulatory guidelines and standards. These measures would also reduce potential air quality impacts and sedimentation.

Once the project is completed, no additional loss of topsoil or erosion would occur as there would be no exposed soils on the project Site and project impact would be less than significant.

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

In Ventura County, paleontological remains, typically identified in Pleistocene-age or older deposits, include examples from throughout most of the related geological history, including the Paleozoic (600-225 million years ago), Mesozoic (225-70 million years ago) and Cenozoic (70 million years ago-present) eras. Based on the geological map of Ventura County, Oxnard quadrangle, the project Site is underlain by Holocene age (10,000 years BP to recent) alluvial fan deposits composed of soils that are deltaic alluvium and wash fan deposits to approximately 70 feet bgs. These are conformably underlain by upper Pleistocene alluvial sand and gravel deposits to approximately 400 feet bgs, and the marine–non-marine clays and gravels of the Lower Pleistocene San Pedro formation to approximately 2,000 feet bgs (ESP 2018a and 2018b; Gutierrez et al. 2008; Turner and Mukae 1975). Holocene age deposits are considered to have a low sensitivity for yielding paleontological resources. In 2010, a paleontological record search of the museum collection records maintained by the Natural History Museum (NHM) of Los Angeles County was conducted for the Oxnard Airport Land Easement Acquisition Project, approximately 2.1 miles west of the project Site (SWCA Environmental Consultants 2009). The record search included a one-mile radius around the airport and indicated that no previously identified paleontological localities occurred within the search area, nor had any resources been reported within the same Holocene age geological unit as the current project APE (SWCA Environmental Consultants 2009). Based on the estimated depth of Holocene-age deposits (to at least 70 feet bgs), surficial ground disturbance is unlikely to encounter or cause a substantial adverse change in significance to a paleontological resource (Turner and Mukae 1975). Assuming that Holocene age deposits extend to approximately 70 feet bgs at the project site, it is highly unlikely that Pleistocene deposits will be encountered during construction. However, if project ground disturbing construction depths exceed the Holocene age deposits or encounters shallow Pleistocene deposits, paleontological resources may be exposed. Paleontological resources in Ventura County include many widely dispersed outcrops of fossil bearing formations (Ventura 2011). With the implementation of Mitigation Measure GEO-3 (Paleontological Resource Impact Mitigation Program), the project would have a less than significant impact.

### **3.7.2.4 Cumulative Impacts**

The proposed project would result in a less than significant contribution to cumulative impacts on soils and geology. The proposed project and all new building projects within the surrounding study area (City and the County) would be required to comply with the applicable State and local requirements, including, but not limited to, the CBC, and would be required to implement recommendations of a Site-specific geotechnical report. Therefore, the project specific impacts, as well as the impacts associated with other projects, would be reduced to a less than significant level. Seismic impacts are a regional issue and are also addressed through compliance with applicable codes and design standards. For these reasons, the project's contribution to cumulative geotechnical and soil impacts is less than significant.

### **3.7.2.5 Mitigation Measures**

**GEO-1:** The building design for structures at the project shall use geotechnical building design recommendations that are based on a Site-specific ground motion hazard analysis for the project Site performed in accordance with ASCE 7-10 (ASCE 2013) Chapter 21 as modified by Section 1803A.6 of the 2016 CBC (ICC 2017). The Site-specific ground motion hazard analysis and geotechnical building design recommendations shall be approved by the CGS and the DSA.

**GEO-2:** An erosion plan shall be developed for project construction activities that includes measures such as the use of hay bales and other erosion control devices as determined by Site-specific conditions, limiting construction to the dry season, and soil wetting, applied as required under applicable regulatory guidelines and standards.



**GEO-3: Paleontological Resource Impact Mitigation Program.** Prior to any ground-disturbing activities, a Paleontological Resource Impact Mitigation Program (PRIMP) shall be prepared by a qualified paleontologist if project construction will exceed Holocene soils (estimated depth of Holocene soils is at least to 70 feet bgs). A qualified paleontologist shall also attend the worker environmental awareness program training and provide information on paleontological resources and a brochure/handout outlining procedures in the event of a paleontological find during construction. The District Project Manager will require the construction contractor to initiate implementation of the PRIMP at the beginning of ground disturbing activities. The PRIMP will address and define the following specific activities and responsibilities:

- Full-time monitoring by a qualified paleontologist during all grading and excavation extending more than 10 ft bgs or beyond Holocene deposits.
- Spot-check monitoring by a qualified paleontologist for all grading and excavation between 5 and 10 ft bgs to determine whether older sediments with a potential to contain paleontological resources are present.
- Procedures for project personnel and/or paleontological monitor to halt work and temporarily redirect construction away from an area if paleontological resources are encountered during grading or excavation in order to assess the significance of the find.
- Procedures for recommendations regarding level of monitoring effort (e.g., spot check, full-time) depending upon sensitivity of soil depth, identification of finds, etc.
- Procedures for handling collected material and curation.
- Procedures for reporting and documenting the results of the monitoring program.
- Provide brochure of environmental awareness training.

### 3.7.2.6 Level of Impact After Mitigation

Implementation of, and compliance with, Mitigation Measures GEO-1, GEO-2, and GEO-3 would reduce all potentially significant impacts related to soils and geology to a less than significant level.

## 3.8 GREENHOUSE GAS EMISSIONS

This section describes the proposed project's potential to affect greenhouse gas emissions. Climate change refers to any significant change in measures of climate, such as average temperature, precipitation, or wind patterns over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Global climate patterns have recently been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, attributed to accumulation of GHG emissions in the atmosphere. GHGs trap heat in the atmosphere, which, in turn, heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities.

### 3.8.1 Environmental Setting

#### 3.8.1.1 Existing Conditions

Based on the 2018 Edition of the GHG Emission Inventory for 2000 to 2016 prepared by the CARB, California emitted 429.4 million metric tons of CO<sub>2</sub> equivalent (MMTCO<sub>2</sub>e) in 2015 (CARB 2018a). According to CARB, the potential impacts in California due to global climate change may include loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines; sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation. As previously mentioned, various measures at the federal and state levels are currently in effect to reduce GHG emissions in an effort to mitigate climate change effects resulting from anthropogenic activity.

#### 3.8.1.2 Regulatory Setting

##### Federal

The U.S. EPA is the agency responsible for writing and implementing federal regulation for the protection of the environment, including regulation for GHG emissions. To this end, the U.S. EPA pursues a number of efforts including collection of data, pursuing emissions reductions by promoting clean energy economy and partnering with states, localities, and tribes. The U.S. EPA delegates its authority to ten executive offices in the United States each of which is responsible for the execution the U.S. EPA programs within several states and territories. California is within the jurisdiction of Region 9.

The U.S. EPA has instituted various regulation measures to reduce GHGs. One of these efforts is codified under 40 CFR, Part 98, which require mandatory reporting of GHG emissions (i.e., CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, sulfur hexafluoride, hydrofluorocarbons, and other fluorinated gases) for certain industrial operations. Most of these industrial operations include electricity generation facilities, oil refineries, and manufacturing operations. Mandatory reporting is also required for combustion sources, such as boilers and stationary engines, which emit more than 25,000 metric tons of CO<sub>2</sub>-equivalents (MTCO<sub>2</sub>e) per year.

##### State

California pursuit of GHG emission reductions has been addressed through Senate Bill (SB) 32, AB 197, AB 32, Executive Order B-16-2012, AB 32, Executive Order S-3-05, and CCR sections 95100-95157.

On September 8, 2016, Governor Edmund G. Brown signed SB 32 and AB 197, which require the state of California to cut emissions by 30 percent below 1990 levels by 2030.

In March 2012 Executive Order B-16-2012 was issued to support the reduction of GHGs through zero-emission vehicles as a measure to pursue achievement of California's target for 2050 to reduce GHG emissions from the transportation sector equaling 80 percent less than 1990 levels.

On September 27, 2006, Governor Arnold Schwarzenegger signed into law AB 32, California Global Warming Solutions Act of 2006, which requires the CARB to develop and implement regulations and initiatives to reduce GHG emissions to 1990 levels, or lower, by 2020. The CARB established the 1990 target at 427 MMT CO<sub>2</sub>e. Pursuant to AB 32, the CARB has also adopted a number of regulations, which are outlined in the initial Scoping Plan, which the CARB adopted in 2008 to prescribe actions aimed at reducing California's GHG emissions. Under AB 32, the CARB has primary responsibility for promulgating regulations, programs, and enforcement mechanisms to achieve the GHG reduction target.

The law requires the CARB to establish a program geared toward tracking and reporting GHG emissions; approve a scoping plan for achieving the maximum technologically feasible and cost effective reductions from sources of GHG emissions; adopt early reduction measures to begin moving forward; and adopt, implement, and enforce regulations—including market mechanisms such as “cap-and-trade” programs—to ensure the required reductions occur. The CARB recently adopted a statewide GHG emissions limit and an emissions inventory, along with requirements to measure, track, and report GHG emissions by the industries it determined to be significant sources of GHG emissions.

AB 32 requires the CARB to update the Scoping Plan every five years. The most recent Scoping Plan update is reflected by the 2017 Scoping Plan Update. The 2017 Scoping Plan Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The 2017 Scoping Plan is guided by the 2030 target of 40 percent emissions reduction below 1990 levels established through Executive Order B-30-15.

On December 2007, California adopted regulation for the mandatory reporting of GHG emissions (mandatory reporting regulation [MRR]) under CCR sections 95100-95157 to comply with requirements promulgated by the U.S. EPA in 40 CFR, Part 98. The MRR sets emissions reporting thresholds of 10,000 MTCO<sub>2</sub>e. Thus, any project or facility with the potential to emit equal to or greater than 10,000 MTCO<sub>2</sub>e from combustion and process emissions would be subject to the MRR reporting requirements.

Regulated GHGs under California Health and Safety Code 38505 include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>). GHGs are commonly quantified in the equivalent mass of CO<sub>2</sub>, denoted CO<sub>2</sub>e, which takes into account the global warming potential (GWP) of each individual GHG compound. The most common GHG that results from human activity is CO<sub>2</sub>, followed by CH<sub>4</sub> and N<sub>2</sub>O.

### Summary of GHGs

The following narratives provide a brief summary of GHGs.

Carbon dioxide enters the atmosphere through burning fossil fuels (coal, natural gas, and oil), solid waste, trees and wood products, and also as a result of certain chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (or “sequestered”) when it is absorbed by plants as part of the biological carbon cycle.

Methane is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and by the decay of organic waste in municipal solid waste landfills.

Nitrous oxide is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

Hydrofluorocarbons, PFCs, SF<sub>6</sub> and NF<sub>3</sub> are synthetic, powerful GHGs that are emitted from a variety of industrial processes. HFCs and PFCs are sometimes used as substitutes for stratospheric ozone-depleting substances (e.g., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). These gases are typically emitted in smaller quantities, but because they are potent GHGs, they are sometimes referred to as High Global Warming Potential gases. SF<sub>6</sub> is employed in electricity transmission and distribution and semiconductor manufacturing. NF<sub>3</sub> results from semiconductor manufacturing processes (CARB 2018b).

## Local

The City of Oxnard General Plan provides various goals and policies related to GHG and global warming. Some of the polities applicable directly and indirectly to the proposed project are listed in Table 3-11.

**Table 3-11.** City of Oxnard Goals and Policies Applicable to the Proposed Project

Goals/ Policies No.	Title	Description
SC-3.9	Promote Voluntary Incentive Programs	Promote voluntary participation in incentive programs to increase the use of solar photovoltaic systems in new and existing residential, commercial, institutional and public buildings, including continued participation in the Ventura County Regional Energy Alliance (VCREA).
SC-3.12	Encourage Natural Ventilation	Review and revise applicable planning and building policies and regulations to promote use of natural ventilation in new construction and major additions or remodeling consistent with Oxnard's temperate climate.
SC-4.1	Green Building Code Implementation	Implement the 2010 California Green Building Code as may be amended (CALGREEN) and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.
ICS-2.6	Reduction of Construction Impacts	Minimize and monitor traffic and parking issues associated with construction activities, require additional traffic lanes and/or other traffic improvements for ingress and egress for new developments for traffic and safety reason, where appropriate.
ICS-3.3	New Development Level of Service C	Determine as part of the development review and approval process that intersections associated with new development operate at a level of service of "C" or better.
ICS-8.8	Educational Facilities	Coordinate with public school districts and other educational facilities to design pedestrian and bicycle access as the preferred access to schools rather than vehicular, and improve drop off and pick up circulation, especially during the morning and afternoon peak periods.
ICS-11.7	Water Wise Landscapes	Promote water conservation in landscaping for public facilities and streetscapes, residential, commercial and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new and replacement landscaping.
ICS 11.12	Water for Irrigation	Require the use of non-potable water supplies for irrigation of landscape whenever available.

Source: City of Oxnard 2011a

## 3.8.2 Impact Analysis

### 3.8.2.1 Methodology

Pursuant to state law (CEQA Guidelines 15064.7), VCAPCD is authorized to adopt thresholds of significance for GHG emissions. To date, VCAPCD has evaluated multiple options, but has not made a decision to adopt any of these options. VCAPCD is leaning toward the adoption of thresholds of significance for land use development consistent with those adopted by the South Coast Air Quality Management District (SCAQMD). On December 5, 2008, SCAQMD Governing Board adopted a proposal for an interim GHG threshold of significance for projects where the SCAQMD is the lead agency. The threshold of significance is applicable for stationary sources and can be used for determining significant impacts for proposed projects (SCAQMD 2008). Under the interim thresholds of significance, projects can emit up to 10,000 metric tons (MT) per year of CO<sub>2</sub>e before being deemed as having significant impacts. GHGs resulting from the proposed project were calculated using CalEEMod and compared to the SCAQMD threshold of 10,000 MT per year of CO<sub>2</sub>e.

### 3.8.2.2 Significance Thresholds

The thresholds for hazards and hazardous materials impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

### 3.8.2.3 Project Impacts

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

The proposed project would generate GHGs during construction and operation activities. Detailed GHG calculation input data and results are presented in Appendix C. A summary of GHG emissions from construction and operation activities of the proposed project including, significance with respect to the SCAQMD threshold of 10,000 MT of CO<sub>2</sub>e is presented in Table 3-12.

**Table 3-12.** Annual Greenhouse Gas Emissions

Phase	CO <sub>2</sub> e (MT)
Construction 2020	1,129
Construction 2021	1,360
Construction 2022	458
Operation	4,379
Threshold	10,000
Significant?	No

As identified in Table 3-12, GHG emissions generated by the proposed project would not exceed the identified threshold and therefore project impacts are considered less than significant.



***Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

As noted above, GHG emissions generated by the proposed project would not exceed the SCAQMD threshold of 10,000 MT of CO<sub>2</sub>e. Neither construction nor operation of the proposed project is expected to conflict with any applicable plan, policy or regulation of any agency adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, project impacts are considered less than significant.

**3.8.2.4 Cumulative Impacts**

The proposed project would contribute GHGs which would add to GHG emitted locally and globally. However, the GHG emissions from the proposed project would not exceed the SCAQMD interim threshold of 10,000 MT per year of CO<sub>2</sub>e and therefore cumulative project impacts are considered less than significant.

**3.8.2.5 Mitigation Measures**

No Mitigation Measures are required.

**3.8.2.6 Level of Impact After Mitigation**

No Mitigation Measures are required, project impact would be less than significant.

## 3.9 HAZARDS AND HAZARDOUS MATERIALS

This section discloses potential hazards and hazardous material impacts that may result from implementation of the proposed project. Technical studies that were reviewed and utilized in the analysis are identified below and included in Appendices F-I to this document.

- *Final Phase I Environmental Site Assessment, Proposed Oxnard High School No. 8, APN 214-002-059 on North Rose Avenue, Oxnard, California* (Tetra Tech 2018b).
- *Draft Preliminary Environmental Assessment High School No. 8. APN 214-002-059 on North Rose Avenue, Oxnard, California 93030* (Tetra Tech 2018c).
- *Technical Memorandum. Supplemental Site Investigation, Proposed High School No. 8. APN 214-002-059 on North Rose Avenue, Oxnard, California* (Tetra Tech 2019b).
- *Supplemental Site Investigation, Proposed High School No. 8. APN 214-002-059 on North Rose Avenue, Oxnard, California* (Tetra Tech 2019c).
- *Technical Memorandum, Maulhardt Ranch High School No. 8 Water Pipeline Safety Hazard Assessment TETR-02.0* (Placeworks 2019)

As noted in the Initial Study (Appendix A), the proposed project would not: create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; by emitting hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of the proposed school Site; be located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. These listed topics were found to have a less than significant impact and are not discussed in detail in the EIR.

### 3.9.1 Environmental Setting

#### 3.9.1.1 Existing Conditions

##### History and Setting

The project Site is currently used for crop cultivation and has been owned and farmed by the Maulhardt family since at least 1869. The Site and adjacent areas of the Maulhardt Property have been used for agricultural production (row crops) since at least 1869. The Site is currently being used for strawberry cultivation. Tetra Tech reviewed California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) Map 214 (DOGGR 2001), the online DOGGR Well Finder (DOGGR 2017), and associated well history documents to evaluate potential presence of oil fields or wells within the Site vicinity. Records indicate that the Site is located within the Oxnard Oil Field; however, no known active or abandoned oil wells are present on the Site or adjacent areas of the 107.25-acre Maulhardt Property. The oil well located nearest to the Site is the Maulhardt Community No. 11A, located approximately 850 feet south of the Site. The Maulhardt Property farm yard and residential area are located adjacent to the south and west of the Site. Formerly, above ground and underground storage tanks were located in the Maulhardt Property farm yard and residential area. A more complete description of the historical land use of the Site and surrounding area is provided in the High School No. 8 Phase I Environmental Assessment (Phase I ESA) (Tetra Tech 2018b).

### Phase I Environmental Site Assessment

The Phase I ESA (Tetra Tech 2018b) was performed under regulatory oversight from the California Department of Toxic Substances Control (DTSC) during 2017 and 2018. The Phase I ESA identified six Recognized Environmental Concerns (RECs) that required additional assessment:

1. Potential toxic soil gas from potential formation leakage from the Oxnard Oil Field;
2. Potential residual organochlorine pesticides (OCPs) and arsenic in soil from former pesticide use, and semivolatile organic compounds (SVOCs), polyaromatic hydrocarbons (PAHs), diesel range total petroleum hydrocarbons (TPHd) and motor oil range total petroleum hydrocarbons (TPHmo) in soil from fuel oil in smudge pots that were formerly used for frost abatement as part of the agricultural production activities at the Site;
3. Potential impacts to shallow soil, soil gas, and groundwater from VOCs, gasoline range total petroleum hydrocarbons (TPHg), and TPHd in fuels formerly stored in above ground storage tanks (ASTs) and underground storage tanks (USTs), and from equipment maintenance activities in the area of the Site adjacent to the Maulhardt Property farm yard and residential areas;
4. Potentially hazardous substances and petroleum products that contained VOCs, TPHg, TPHd, and TPHmo that may have been used and stored in the Tin Shed, Horse Barn, Garage, and Storage Shed on the Maulhardt Property that may have impacted shallow soil, soil gas, and groundwater in the areas of the Site adjacent to the Maulhardt Property farmyard area;
5. PCB soil contamination from a pole-mounted electrical transformer located onsite along the southern Site boundary along Camino Del Sol; and
6. Potentially hazardous water transmission pipelines identified within 1,500 feet of the Site.

The Phase I ESA recommended that a PEA be performed under DTSC oversight to evaluate the six RECs described above, and that a hazardous pipeline assessment be conducted in accordance with the *Guidance Protocol for School Site Pipeline Risk Analysis* (CDE 2007). DTSC approved the Phase I ESA in a letter dated April 24, 2018 (DTSC 2018a) concurring with the recommendation to perform a PEA for the project Site.

### Preliminary Environmental Assessment

The PEA was performed during July through November 2018 under DTSC oversight and is documented in the PEA report (Tetra Tech 2018c). The PEA field sampling program included:

- Construction of temporary soil gas probes using direct push drilling at 25 locations laid out in a uniform grid pattern to collect soil gas samples from 5 and 15 feet bgs to assess potential leakage of hydrogen sulfide and methane gas to soil from the underlying oil-bearing zones of the Oxnard Oil Field using an onsite mobile laboratory;
- Construction of temporary soil gas probes using direct push drilling at five locations to collect soil gas samples from 5 and 15 feet bgs to assess potential VOCs gas in soil from motor fuel formerly stored in ASTs and USTs in the adjacent Maulhardt Property farm yard and residence area using an onsite mobile laboratory;
- The collection of 60 surface soil samples from 60 locations laid out in a uniform grid pattern. The surface samples collected from all 60 locations were analyzed for OCPs and 15 of the 60 surface soil samples were analyzed in a laboratory for SVOCs, PAHs, TPHd, and TPHmo;
- The collection of 1 surface soil sample from beneath the pole-mounted electrical transformer located on-site adjacent to Camino Del Sol for PCB laboratory analysis;

- The collection of soil samples at 5 and 20 feet bgs from the five direct push borings located adjacent Maulhardt Property farm yard and residence area and laboratory analysis for VOCs TPHg, TPHd, and TPHmo; and
- The collection of groundwater samples at 21 feet bgs from the five direct push borings located adjacent Maulhardt Property farm yard and residence area and laboratory analysis for VOCs TPHg, TPHd, and TPHmo.

The Draft PEA Report was completed on November 9, 2018 and submitted to DTSC for review (Tetra Tech 2018c) and contained the following conclusions on the field sampling results:

- The soil gas beneath the Site has not been impacted by emissions from the Oxnard Oil Field, and fuel or petroleum products that may have been released from ASTs and USTs formerly located in the adjacent Maulhardt Property farm maintenance activities performed in farmyard and residential areas. No methane, carbon monoxide, carbon dioxide, hydrogen sulfide, or TPHg were detected in any of the soil gas samples (Tables 9 and 10). Naphthalene and toluene were detected at concentrations well below Screening Levels.
- The Site appears to have been impacted by agricultural production activities. OCPs were detected in all 60 of the discrete surface oil samples and the nine duplicate samples collected for OCP analysis. The OCPs 4,4'-DDD (DDD), 4,4'-DDT (DDT), 4,4'-DDE (DDE), Chlordane (total), Chlordane (alpha), and Chlordane (gamma) were detected at concentrations below their respective Screening Levels. Dieldrin was detected in three samples at concentrations of 34.70 µg/kg, 37.20 µg/kg, and 40.40 µg/kg, slightly above its Screening Level of 34 µg/kg. Toxaphene was detected in 33 samples at concentrations above its Screening Level (490 µg/kg) at concentrations ranging from 510 µg/kg to 2,600 µg/kg over an area of approximately 28 acres (Figure 5 of Draft PEA Report). No other significant impacts were identified at the Site.
- Arsenic was detected in one sample with J-Flagged results at a concentration 2.65 milligrams per kilogram (mg/kg). Arsenic was not detected at concentrations above its laboratory method detection limit (MDL) (2.5 mg/kg) or the DTSC-ASL of 12 mg/kg (Cal/EPA DTSC 2008) in any of the other samples. No significant impacts to the Site from arsenic in surface soil were identified.
- The Site surface soils do not appear to have been significantly impacted by smudge pot fuel. SVOCs, PAHs, TPHde, and TPHg were not detected at concentrations above their respective Screening Levels.
- The Site subsurface soil in areas of the Site adjacent to the Maulhardt Property farmyard and residential areas do not appear to have been significantly impacted by releases of VOCs, TPHg, and TPHde from petroleum products that may have been released from ASTs and USTs and farm maintenance activities. VOCs, TPHg, and TPHde were not detected at concentrations above their respective Screening Levels.
- The groundwater in areas of the Site adjacent to the Maulhardt Property farmyard and residential areas does not appear to have been significantly impacted by releases of VOCs, SVOCs, and TPHde from petroleum products that may have been released from ASTs and USTs and farm maintenance activities.

A screening level human health risk evaluation was performed for the PEA using the VOCs detected in soil gas (naphthalene and toluene), and the following constituents detected in soil (chlordane [total], 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, dieldrin, toxaphene, PAHs, fluoranthene and phenanthrene, TPHg, TPHd, and TPHmo) as chemicals of potential concern (COPCs). The screening level human health risk evaluation concluded that OCPs detected at the Site (primarily toxaphene) appear to be present at significant concentrations that pose a threat to likely human receptors, including residential/unrestricted land use. Assumed exposures at the Site result in a maximum cumulative carcinogenic risk estimate ( $8 \times 10^{-6}$ ) that exceeds the DTSC point of departure of  $1 \times 10^{-6}$  for potential residential receptors. The estimated cumulative cancer risk associated with potential exposures to soil based on the 95% UCLs for pesticides maximum detected concentrations for other chemicals is  $4 \times 10^{-6}$ , which is within the low end of the USEPA target risk range of  $10^{-4}$  to  $10^{-6}$  and exceeds the point of departure of  $1 \times 10^{-6}$  for potential

residential receptors. Noncarcinogenic hazard from assumed exposures to the COPCs in soil and soil gas at the Site (Hazard Index [HI] = 0.2) is well below the threshold level of 1.

The Draft PEA report concluded that the surface soil sampling performed for PEA has adequately defined the lateral extent of OCP-impacted soil at the Site at concentrations exceeding Screening Levels. The Draft PEA report recommended that a SSI workplan be developed and implemented at the Site under DTSC oversight to assess the depth of OCP-impacted soil at the Site at concentrations exceeding Screening Levels (specifically toxaphene and dieldrin). A remedy for the OCP-impacted soil at the Site will be developed following completion of the SSI. In a letter dated December 27, 2018, the DTSC concurred with the adequacy of the Draft PEA pending review of public comment (DTSC 2018b).

The Public Review Period for the Draft PEA Report was held from February 1 through March 4, 2019. No public comments were received by the OUHSD at the Public Hearing and during the Public Review Period on the subject Draft PEA Report. In the letter dated March 12, 2019, the DTSC approved the Draft PEA Report and concurred with the recommendation in the Draft PEA Report to perform a SSI to determine the nature and extent of OCP-impacted soil at the Site (DTSC 2019a).

#### Supplemental Site Investigation

The SSI was performed during January through April 2019 under DTSC oversight and is documented in the SSI report (Tetra Tech 2019c). The SSI field sampling program included the collection of subsurface soil samples at 1.0 ft bgs, 1.5 ft bgs, and 2.0 ft bgs at 10 locations (30 samples total) to assess the vertical extent of OCPs at concentrations exceeding screening levels). Based on the results of the SSI sampling program, the maximum depth of OCP-impacted soil at the Site at concentrations exceeding screening levels has been defined and is between approximately 1.5 and 2.0 feet bgs.

A Human Health Risk Evaluation was performed for the SSI using the COPCs developed for the PEA and the SSI OCP sample results. As agreed to by DTSC at the January 4, 2019 SSI scoping telephone conference, the SSI Human Health Risk Evaluation included the following four scenarios:

- Maximum cumulative carcinogenic risk estimate;
- 95% upper confidence limit (95% UCL) of the arithmetic mean;
- Unrestricted Land Use; and
- School-Based (Students and Teachers).

The results of the risk characterization for the residential scenario based on the maximum detected concentrations indicate that toxaphene levels detected in soil result in an estimated risk that exceed the residential target risk level ( $1 \times 10^{-6}$ ). However, the estimated cumulative risks for the school-based student scenario (range from  $2 \times 10^{-7}$  to  $4 \times 10^{-7}$ ) were well below the student target risk level ( $1 \times 10^{-6}$ ). For the school-based teacher scenario, the estimated cumulative risks ranged from  $7 \times 10^{-7}$  to  $2 \times 10^{-6}$ , which are well below the target risk level for teachers ( $1 \times 10^{-5}$ ). It is noteworthy, that for the teacher scenario, only the estimated risk based on the maximum detected concentrations ( $2 \times 10^{-6}$ ) exceeded the low end of the U.S. EPA target risk range of  $10^{-6}$  to  $10^{-4}$ . The estimated risks based on the 95% UCL concentrations and modified soil screening level for toxaphene were equal to, or lower than the low end of the USPEA target risk range of  $10^{-6}$  to  $10^{-4}$ . The school-based scenarios best represent the conditions that will be encountered by students and teachers at the high school Site. Therefore, the results of this human health risk evaluation indicate that it is unlikely that the COPCs detected in soil gas and soil are present at levels that would be expected to result in adverse health effects under the school-based scenarios evaluated in this SSI report.

Based on the results of the SSI risk characterization, The SSI Report recommended a No Further Action (NFA) determination by DTSC for the High School No. 8 Site. In a letter dated April 26, 2019, DTSC approved the SSI Report and concurred with the recommendation for an NFA determination for the project Site (DTSC 2019b).



### Water Pipeline Hazard Assessment

A Water Pipeline Hazard Assessment (WPHA; Placeworks 2019) was performed to fulfil CDE school Site selection criteria requirements under CCR Title 5 Section 14010 et seq. and Education Code Section 17213 et seq. The WPHA concluded that a potential break in any of the water pipelines located within 1,500 feet of the Site would not result in significant flooding at the project Site.

### **3.9.1.2 Regulatory Setting**

The EPA defines a hazardous waste as a substance that (1) may cause or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating reversible illness; and (2) poses a substantial present or potential future hazard to human health or the environment when it is improperly treated, stored, transported, disposed of, or otherwise managed. Hazardous waste is also defined as ignitable, corrosive, explosive, or reactive (Code of Federal Regulations [CFR] Title 40: Protection of the Environment, Part 261).

A material may also be classified as a hazardous material if it contains defined amounts of toxic chemicals. The EPA has developed a list of specific hazardous wastes that are in the forms of solids, semisolids, liquids, and gases. Producers of such wastes include private businesses and federal, State, and local government agencies. The EPA regulates the production and distribution of commercial and industrial chemicals to protect human health and the environment. The EPA also prepares and distributes information to further the public's knowledge about these chemicals and their effects and provides guidance to manufacturers in pollution prevention measures, such as more efficient manufacturing processes and recycling used materials.

### **Federal**

#### ***Hazardous Materials Regulations (CFR Titles 10, 29, 40, and 49)***

The EPA, the Occupational Safety and Health Administration (OSHA), and the United States Department of Transportation (DOT) regulate hazardous materials. Federal regulations for hazardous materials are primarily found in CFR Titles 10, 29, 40, and 49. In particular, CFR Title 40 Part 261 governs the identification and listing of hazardous wastes, their storage, and disposal.

Federal laws include the following major statutes (and regulations issuing from them):

- **Resources Conservation and Recovery Act (RCRA)**, Hazardous waste management;
- **Hazardous and Solid Waste Amendments Act (HSWA)**, Hazardous waste management;
- **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**, Cleanup of contamination and funding for responses;
- **Superfund Amendments and Reauthorization Act (SARA)**, Cleanup of contamination; and
- **Emergency Planning and Community Right-to-Know (SARA Title III / EPCRA)**, Business inventories, emergency response planning, and notification.

The EPA is the primary federal agency responsible for the implementation and enforcement of hazardous materials regulations. In most cases, enforcement of environmental laws and regulations established at the federal level is delegated to State and local environmental regulatory agencies (LSA 2013).

#### ***Federal OSHA (29 USC 651 et seq.)***

OSHA established requirements for workers involved in the handling, use, and disposal of hazardous materials, including emergency response, hazard communication, and personal protective equipment. The law also requires manufacturers to prepare safety data sheets (SDSs) which describe the proper use of hazardous materials) and provide SDSs to shippers, product end users, and workers (LSA 2013).

### ***Hazardous Waste Operations Emergency Response (HAZWOPER)***

OSHA requires special training under 29 CFR 1910.120 for workers who handle hazardous materials, and requires notification to employees who work in the vicinity of hazardous materials. HAZWOPER also requires employers to train personnel to respond to accidental releases of hazardous materials.

OSHA also regulates lead and asbestos exposure as it relates to worker safety (LSA 2013).

### ***Federal Aviation Regulations (FAR) Title 14 Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace***

The FAA uses these standards for determining whether objects may obstruct safe air navigation. Part 77 defines a number of “imaginary surfaces” extending from the runway that are utilized by the FAA to gauge potential flight hazards prior to construction of project near airfields. The “horizontal surface” is established at 150 feet above the elevation level of the airport (for Oxnard Airport this elevation is 45 feet amsl, while “transitional surfaces” extend up and away from the primary approach surface edges and rise at a 7:1 slope until reaching the horizontal surface at 195 MSL. Any proposed structures that breach these surfaces are subject to review by the FAA. The FAA would issue a determination of a hazard to air navigation if they find a safety problem (LSA 2013).

### **State**

State agencies have been delegated by federal law to implement federal hazardous materials and hazardous waste regulations under RCRA. Where state regulations are more restrictive, hazardous wastes are regulated under the California HSC (LSA 2013).

The DTSC and the Regional Water Quality Control Boards (RWQCBs) have been assigned jurisdiction over hazardous chemical materials management by the State Legislature. DTSC administers the State’s hazardous waste program and implements the federal (RCRA) program in California. The nine RWQCBs in the State issue and enforce National Pollutant Discharge Elimination System (NPDES) permits and regulate leaking underground storage tanks (LUSTs) and other sources of groundwater contamination. Other State agencies involved in hazardous materials management are the Department of Industrial Relations (State OSHA implementation), Office of Emergency Services (OES; California Accidental Release Prevention implementation), CDFW, CARB, Caltrans, State OEHHA (Proposition 65 implementation), the Department of Resources Recycling and Recovery (CalRecycle) (operation of landfills and waste handling/disposal facilities), and the State of California Division of Oil, Gas, and Geothermal Resources (DOGGR). The enforcement agencies for hazardous materials transportation regulations are the California Highway Patrol (CHP) and Caltrans (LSA 2013).

### ***Government Code Section 65962.5***

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites (LSA 2013).

### ***California Code of Regulations and California Health and Safety Code (HSC)***

The CCR and the California HSC incorporate the requirements of the federal RCRA Subtitle I and set registration and permitting requirements, construction/operational standards, closure requirements, licensing of UST contractors, financial responsibility requirements, release reporting/corrective action requirements, and enforcement. Additionally, these provisions regulate the abatement process in the event of contamination of hazardous wastes. Specifically, the California HSC establishes standards, regulations, and requirements for the installation, inspection, registration, maintenance, and abandonment of USTs (LSA 2013).

### ***Emergency Planning and Community Right-to-Know (Proposition 65)***

These regulations require worker notification of hazardous substances in the workplace. Parts of Title 8 of CCR Sections 1532.1 and 1529 provide for exposure limits, exposure monitoring, respiratory protection, and good

working practices by workers exposed to lead and asbestos as well as regulate abatement and disposal of these materials.

***Oil and Gas Resources Regulations (Title 14, Chapter 4)***

This chapter of the CCR establishes requirements for the development, regulation, and conservation of oil and gas resources. Specifically, Section 1723 et seq. establishes well abandonment rules for oil and gas wells and Section 1981 lays out standards for modifying existing wells and expands standards for plugging abandoned wells. The California DOGGR supervises the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells to ensure compliance with Title 14 and other regulatory requirements for oil and gas development (LSA 2013).

***Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (27 CCR Division 1, Subdivision 4, Chapter 1, Sections 15100–15620)***

Created by State legislation in 1993 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities, the Unified Program legislation empowered Cal-EPA to grant qualifying local agencies oversight and permitting responsibility for the following emergency and management programs:

- Hazardous materials release response plans and inventories (business plans);
- California Accidental Release Prevention Program (CalARP);
- UST Program;
- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control and Countermeasure Plans;
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (tiered permitting) Programs; and California Uniform Fire Code: hazardous material management plans and hazardous material inventory statements.

The Ventura County Certified Unified Program Agency (CUPA) provides oversight for these programs in Ventura County and the Oxnard Fire Department administers these programs in the City (LSA 2013).

***CEQA PRC Section 21151.8 (School Sites and Hazardous Materials); CEQA Guidelines, Section 15186 (School Facilities)***

Prohibits lead agencies from approving environmental documents for any project involving the purchase of a school site or the construction of a new school where public funds are used. Purchase or development with public funds is specifically prohibited the following school development sites:

- Current or former hazardous wastes sites;
- Sites that contain hazardous materials pipelines (above or below ground); or
- Or have facilities located within 0.25-mile of the proposed school Site that may reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste.

For proposed school sites within 0.25-mile of potential emitters or handlers of hazardous or acutely hazardous material/substance/wastes the lead agency must find that there is not an actual risk, or that the risks have been mitigated to a level that there is not actual or potential endangerment of public health. The DTSC, as the assigned lead agency for California school development projects using public funds, uses a well-defined process to evaluate risks and approve school sites for purchase or development that includes preparation of Phase I ESAs and PEAs to identify and evaluate actual risk.

### ***Education Code, Sections 17213.1, 17213.2, and 17268***

These statutes require extensive DTSC involvement in the environmental review process for projects that will receive State funding. Prior to acquiring a school site or approving a school construction project, school districts must complete a number of environmental review steps that may include the following documents:

- **Phase I ESA:** The Phase I ESA must contain sufficient information to determine whether there is a potential for exposure to hazardous materials and must conclude that either (1) a further investigation of the Site is not required, or (2) further investigation is necessary.
- **PEA:** If a school district chooses to proceed with a PEA, it must enter into an Environmental Oversight Agreement with DTSC to oversee preparation of the PEA. DTSC must then assist the district with scoping the work plan for the PEA investigation. Sampling could include soil gas, soil matrix, groundwater, and other sampling and calculation of cancer risks and non-cancer risks. Based on information developed during the PEA and a conservative human and ecological risk evaluation, the DTSC would then make a decision regarding potential risks posed by the Site. Possible outcomes of the DTSC's decision include the following:
  - The process continues through a **SSI** process if the site is found to be significantly impacted by hazardous materials, and the school district elects to continue to pursue site development;
  - **Removal Action:** If localized hazardous impacts are found that can eliminate or mitigate conditions through excavation; and
  - Issuance of a "No Further Action" finding if the site is found not to be significantly impacted and risks to human health and the environment are found to be within acceptable levels based on the conservative screening level human health risk assessment. Any human health risk assessment must be quantitative for both residential and school-based receptors. The effort entails data aggregation, selection of chemicals of potential concern, exposure assessment, toxicity assessment, and risk characterization.
- **Removal Action:** A school district can choose to enter into a Voluntary Cleanup Agreement (VCA) with DTSC if the district elects to perform a removal action to prepare the site for use as a school site where the presence of contaminants have been confirmed through a PEA or SSI that exceed human health risk assessment guidelines for protectiveness for school-based receptors.

Before a site's school buildings can be occupied, DTSC must certify that all response actions that are necessary to ensure that hazardous materials at the school site no longer pose a significant risk to children and adults, except for operation and maintenance activities, have been completed (LSA 2013).

### ***Education Code, Section 17215***

Before acquiring title to property for a new school site, the school district governing board is required to notify the CDE of the proposed acquisition, if the proposed site is within 2 miles of an airport runway or a potential runway is included in an airport master plan that is nearest to the site. CDE must then notify the DOT, which in turn would investigate the proposed site and submit a written report of its findings, including recommendations concerning acquisition of the site. As part of the investigation, the owner and operator of the airport would be granted the opportunity to comment upon the proposed school site. If the written report does not favor the acquisition of the property for a school site, State funds or local funds cannot be used for acquisition of, or school construction at, the subject site (LSA 2013).

### ***Education Code, Section 17251; CDE Regulations, 5 CCR Section 14010 (Standards for School Site Selection)***

Section 17251 requires CDE to establish standards for use by school districts in assessing school sites. The CDE regulations adopted pursuant to Section 17251 contain the following standards for school sites, among others:

- The site shall not be adjacent to a road or freeway that any site-related traffic studies have determined will have safety problems (5 CCR Section 14010[e]).
- The site shall not be located near an above ground water or fuel storage tank or within 1,500 feet of the easement of an above ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study, conducted by a competent professional, which may include certification from a local public utility commission (5 CCR Section 14010[h]).
- If the proposed site is on or within 2,000 feet of a significant disposal of hazardous waste, the school district shall contact the DTSC for a determination of whether the property should be considered a Hazardous Waste Property or Border Zone Property (5 CCR Section 14010[t]).

There are several additional elements listed under these sections of the Education Code, CDE Regulations, and CCR that were evaluated in the IS and were not carried forward to the EIR (LSA 2013).

#### ***CDE School Facilities Planning Division, School Site Selection, and Approval Guide (CDE 2001)***

The site selection guide outlines the requirements of the CDE regulations for site selection that are described above and includes recommendations that are designed to ensure a safe school environment and facilitate State approval of sites. The guide helps school districts determine compliance with the requirements of CDE Regulations Section 14010 et seq. and Education Code Section 17213 et seq. (LSA 2013).

#### **Local**

Within the City of Oxnard, Oxnard Fire Department has jurisdictional responsibility as the CUPA.

### **3.9.2 Impact Analysis**

#### **3.9.2.1 Methodology**

The CDE has several requirements for analyzing new school sites related to hazards and hazardous materials (Section 3.9.1.2). The hazards and hazardous materials issues associated with the project Site were analyzed in the reports cited in the introduction to Section 3.9. The reports included Site reconnaissance, soil gas, soil, and groundwater sampling, historical research, risk assessment, and findings and recommendations. The information in these reports has been used to assess hazards and hazardous materials impacts as they pertain to CEQA compliance.

#### **3.9.2.2 Significance Thresholds**

The thresholds for hazards and hazardous materials impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *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 significant hazard to the public or the environment?*

#### **3.9.2.3 Project Impacts**

***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 significant hazard to the public or the environment?***

As stated in Section 3.9.1.1 above, based on the results of the SSI risk characterization, the SSI Report recommended a NFA determination by DTSC for the High School No. 8 Site. In a letter dated April 26, 2019, DTSC approved the SSI Report and concurred with the recommendation for an NFA determination for the project Site.



Therefore, the project Site is not located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and no project impact would result.

#### **3.9.2.4 Cumulative Impacts**

The proposed project would result in a less than significant contribution to cumulative impacts on hazardous materials. The proposed project and all new building projects within the surrounding study area (City and the County) would be required to comply with the applicable State and local requirements, including, but not limited to, the DTSC, CDE, FAR, Caltrans DOA, Ventura County, and the City of Oxnard, and would be required to implement recommendations of the Site-specific PEA Report, SSI Report, and associated DTSC approval letters.

#### **3.9.2.5 Mitigation Measures**

No Mitigation Measures are required.

#### **3.9.2.6 Level of Impact After Mitigation**

No Mitigation Measures are required; project impact would be less than significant.

## 3.10 HYDROLOGY AND WATER QUALITY

This section describes the proposed project's potential to affect hydrology and water quality.

### 3.10.1 Environmental Setting

#### 3.10.1.1 Existing Conditions

##### Surface Water

The project Site is located within the Santa Clara River floodplain and according to the Ventura County Watershed Protection District's (VCWPD's) *Rice Road Drain Design Hydrology Update Draft Report* (2016), the project lies within the Rice Road Drain (RRD) watershed. The RRD watershed is approximately 3,250 acres and is located primarily within the Oxnard City limits, although a portion is also within unincorporated Ventura County agricultural areas. The RRD watershed drains most of the west side of Oxnard. According to the *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, the RRD watershed is located within the larger *Miscellaneous Ventura Coastal Watershed Management Area* (WMA) that is composed of four separate coastal watersheds located between the western Los Angeles Region (Region 4) boundary, Ventura River, Santa Clara River, and Calleguas Creek Watersheds, as well as the Santa Monica Bay WMA (Los Angeles RWQCB 2014) (Basin Plan). The Basin Plan also states that the drainage areas within the WMA are typified by either small coastal streams, wetlands, or marinas/urban centers in areas that historically consisted of extensive wetlands.

The project area does not contain any streams, wetlands, or other waters under jurisdiction of the U.S. Army Corps of Engineers (USACE), RWQCB, or CDFW. According to the *Preliminary Drainage Report Northeast Community* (Jensen Design & Survey, Inc. 2018a), storm water runoff from the Site currently flows to a series of agricultural drainage ditches and eventually to Camino del Sol, which borders the project to the south. From Camino del Sol, runoff discharges to Rice Road Drain, which begins on the south side Camino del Sol and flows south. The *Rice Road Drain Design Hydrology Update Draft Report* states that flow rates into the Rice Road Drain can be no greater than one cubic foot per second per acre (cfs/ac) due to a 1987 agreement between the VCWPD and the City of Oxnard limiting the 100-year outflow from subareas located north of Fifth Street (VCWPD 2016). The report also states that numerous detention basins have been installed within the drainage area to Rice Road Drain in compliance with the agreement.

The VCWPD's public GIS maps show that Rice Road Drain continues to run south to Pleasant Valley Road, then turns southwest paralleling Pleasant Valley Road until terminating at (and discharging into) Oxnard Industrial Drain, which discharges to an open channel that flows to a slough adjacent to Ormond Beach at the Pacific Ocean (County of Ventura 2019). The City of Oxnard's storm water drainage features are maintained by the City of Oxnard Public Works Department Operations Division and VCWPD.

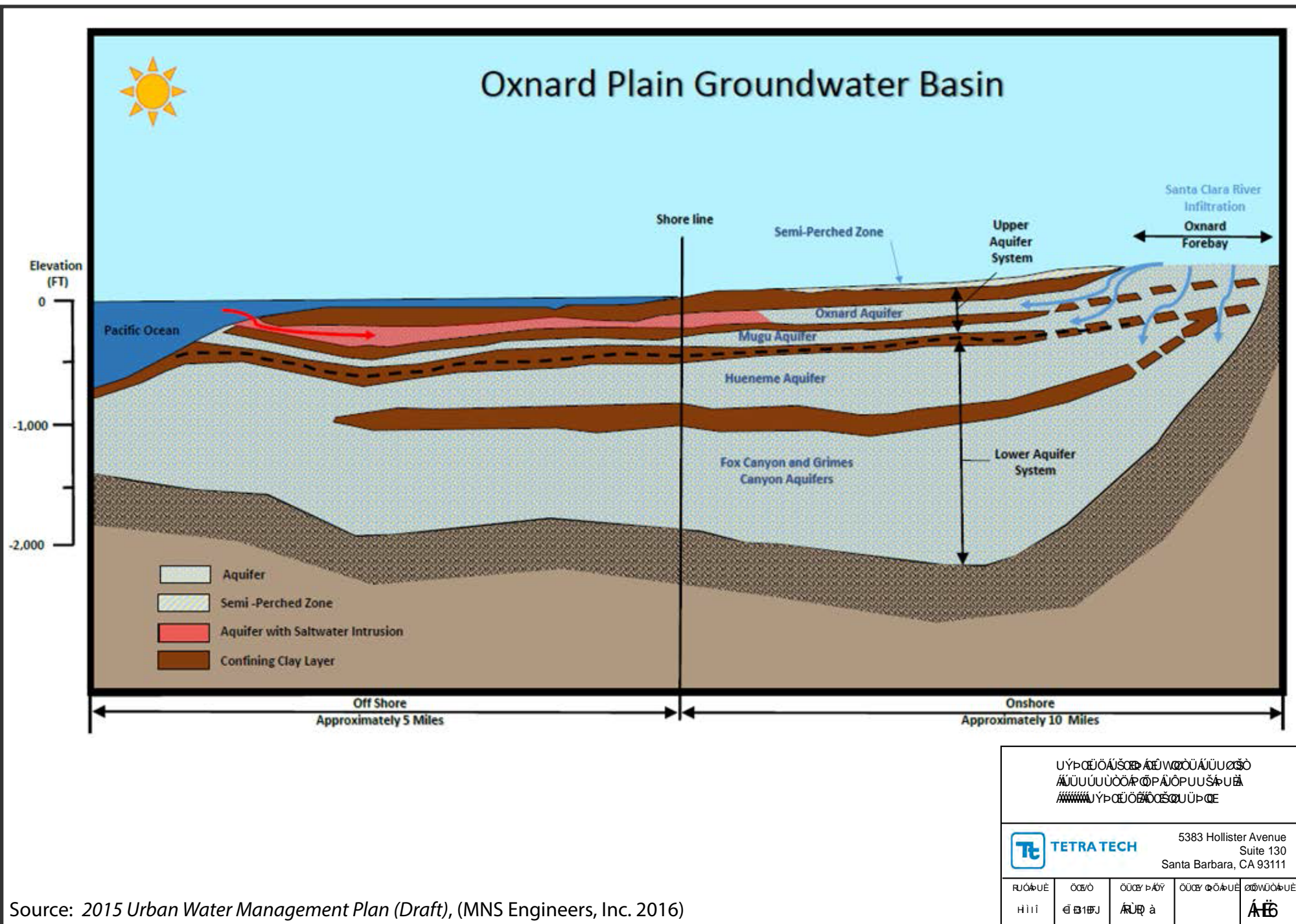
##### Groundwater

The Oxnard Plain Groundwater Basin that underlies the project area is an alluvial basin containing a collection of interconnected aquifers separated by layers of clay strata. At the ground surface, the Oxnard Plain Groundwater Basin consists of the Oxnard Plain Forebay and Oxnard Plain Pressure Basin or Semi Perched Zone. Figure 3-6 provides a schematic profile view of the Oxnard Plain Groundwater Basin. The Oxnard Plain Forebay is located along the Santa Clara River approximately 2 miles north of the Site northeast of where the Pacific Coast Highway joins U.S. Highway 101 in the City of Oxnard. It encompasses an area of approximately 9.5 square miles and constitutes the principal area of groundwater recharge within the Oxnard Plain. The Oxnard Forebay Basin is recharged by infiltration from the riverbed of the Santa Clara River and spreading basins constructed for that purpose. The Oxnard Plain Forebay on the northwest by the McGrath Fault which is approximately contiguous with the northwest bank of the Santa Clara River, and on the south by the thickening clay sediments of the Oxnard Plain

Pressure Basin. The Oxnard Plain Pressure Basin is exposed at the ground surface throughout the remainder of the Oxnard Plain Groundwater Basin area and encompasses approximately 75.2 square miles. Within the Oxnard Plain Pressure Basin barrier, groundwater recharge to the Oxnard Plain Groundwater Basin limited by a thick sequence of fine grain clay sediments, referred to as the “clay cap” that act as an aquiclude to groundwater movement. The Site is located within the Oxnard Plain Pressure Basin area (Turner and Mukae 1975; County of Ventura 1975).

The water bearing zones of the Oxnard Plain Groundwater Basin are grouped into three major units; 1) the semi-perched aquifer and clay cap, 2) the UAS, and 3) the LAS.

From the Oxnard Forebay, located in the upper most portion of the Oxnard Plain Basin, groundwater seeps into the UAS and LAS because the clay layers which separate the aquifers are not continuous at this location (Figure 3-6).



The semi-perched aquifer and clay cap consists of all the alluvial materials extending from the ground surface to the top of the Oxnard aquifer. In the Site area, the semi-perched aquifer extends to depths of approximately 75 feet bgs and the clay cap from approximately 75 feet bgs to 150 feet bgs (Turner and Mukae 1975). The semi-perched aquifer consists primarily of geologically Recent-aged stream deposited sands and gravels with minor silt and clay interbeds. Sand and gravel deposits are generally parallel to the deltaic channel complex of the ancestral Santa Clara River and form lenses perpendicular to the channels of the ancestral Santa Clara River. The depth to the historically highest groundwater elevation for the Site area shown on Plate 1.2 of the *Seismic Hazard Zone Report for the Oxnard 7.5-Minute Quadrangle, Ventura County, California* (CGS 2002a) is approximately 8 feet bgs. The “clay cap” underlies the semi-perched groundwater zone separating it from the underlying Oxnard aquifer of the UAS. This clay cap acts as an aquitard. Based on topographic controls, groundwater in the Site vicinity is expected to flow toward the south to south-southwest.

The UAS system consists of the Oxnard and underlying Mugu aquifer zones. These two water-bearing units were combined due to their similar, planar structure. Both the Oxnard and Mugu aquifers are composed of sediments deposited largely by the ancestral Santa Clara River during the Upper Pleistocene. The Oxnard aquifer zone extends from approximately 150 to 200 feet bgs in the Site area and is a laterally continuous layer gravel and cobbles and coarse to fine sand, with local fine-grained lenses deposited in non-marine environment. The underlying Mugu aquifer zone extends from approximately 200 to 400 feet bgs in the Site area and consists of laterally continuous sand and gravel deposited in a shallow marine embayment on an erosional unconformity on top of the San Pedro formation that forms the top of the LAS. The UAS is hydraulically connected to the Pacific Ocean through the Oxnard and Mugu aquifers and is the means by which seawater intrusion enters the Oxnard Plain Basin (Figure 3-6).

The LAS system in the Site area, in descending order, consists of the Hueneme and Fox Canyon aquifer zones. The sediments in the LAS are more structurally complex than the UAS resulting from folding and faulting. Both the Hueneme and Fox Canyon aquifer zones are composed of lower Pleistocene age San Pedro Formation.

During drought cycles, the Fox Canyon Groundwater Management Agency (FCGMA) manages groundwater extractions in the Oxnard Plain. It has restricted groundwater pumping from the Oxnard Plain aquifers to manage “safe yield”. The City’s groundwater supply source, by the City and UWCD, is capped at approximately 14,686 AFY (City of Oxnard 2018a). Extractions over this volume are monetarily penalized. The City projects that this allocation will be further reduced in the future (City of Oxnard 2018a).

The 2015 Sustainable Groundwater Management Act (SGMA) required the establishment of a Groundwater Sustainability Agency (GSA) for each California groundwater basin, which is required to develop a Groundwater Sustainability Plan (GSP) that is submitted to the California Department of Water Resources by 2020. The GSPs are to describe the basin’s sustainability goal, actions needed to achieve the goal in 20 years, a 50-year planning and implementation plan, and a monitoring program. The FCGMA is the local GSA and is currently developing GSPs for the Oxnard basins (MNS Engineers, Inc. 2018).

### Potable Water Sources

The City of Oxnard obtains water from three sources, which is blended to balance water quality and cost (MNS Engineers, Inc. 2018). The sources are:

- Groundwater pumped directly from the underlying aquifer, which is regulated by the FCGMA;
- Groundwater purchased from United Water Conservation District (UWCD), which is also under the FCGMA jurisdiction; and
- State Water Project water purchased from Metropolitan Water District of Southern California (MWDSC) as part of the local Calleguas Municipal Water District (CMWD).



Groundwater supplied to the City of Oxnard is drawn from the Oxnard Plain Groundwater Basin, a subbasin of the Santa Clara River Valley Groundwater Basin (Groundwater Basin Number 4-4.02 [California Department of Water Resources, Groundwater Bulletin 118, Santa Clara River Valley Groundwater Basin, Oxnard Subbasin]). The City of Oxnard's active groundwater wells are located at the City Water Division Yard. Well numbers 22 and 23 are within the UAS and well numbers 20 and 21 are within the LAS, per the *East Village Phase III Annexation Draft Environmental Impact Report* (City of Oxnard 2012). Each system has a pumping rate of approximately 6,000 gallons per minute (gpm). The wells pump groundwater from the aquifer into a 220,000-gallon clear well reservoir (City of Oxnard 2012). Pumped groundwater is treated with a "desalter" to remove salt and improve the quality. Groundwater from three of the wells is treated using reverse osmosis (MNS Engineers, Inc. 2018).

The UWCD diverts water from the Santa Clara River at the Vern Freeman Diversion Dam southeast of Saticoy during high flows and delivers a portion of the water to the Saticoy and El Rio Spreading Grounds and agricultural users on the Oxnard Plain (MNS Engineers, Inc. 2018). Water that percolates in these spreading basins recharges the Forebay to the Oxnard Plain. The UWCD's eleven wells extract the water and deliver it to the Oxnard-Hueneme (O-H) users (MNS Engineers, Inc. 2018). The El Rio Pumping Station provides pressurized chlorinated groundwater directly through O-H Pipeline along Rose Avenue to Oxnard's five blending stations (MNS Engineers, Inc. 2018).

The water source from the State Water Project originates in Northern California and is conveyed over 500 miles to Southern California through the State Water Project's system of reservoirs, aqueducts and pump stations. Water is filtered and disinfected at MWDSC's Joseph Jensen Filtration Facility in Granada Hills. CMWD receives the treated water from MWDSC via the MWDSC's West Valley Feeder and either stores the treated water in Lake Bard to be treated later or feeds the water directly to the Springville Reservoir near Camarillo. The City receives water from Springville Reservoir through the City of Oxnard's Del Norte and Oxnard Conduits that feed the City's blending stations (MNS Engineers, Inc. 2018). The MWDSC's water conservation programs, such as bewaterwise.com, apply to City of Oxnard water customers.

The City of Oxnard mixes the water sources at its blending stations located throughout the service area. Although the ratio of blending operations varies, the City of Oxnard indicates that future blending will use a 1:1 (surface water to groundwater) ratio (MNS Engineers, Inc. 2018). This ratio produces water that has a total dissolved solids (TDS) level between 600 and 700 milligrams per liter (mg/L), which meets the upper limit of the secondary drinking water standards (1,000 mg/L), at a fairly cost-effective unit rate (MNS Engineers, Inc. 2018).

The MWD completed a reliability analysis for its 2015 UWMP. After projecting demands for single dry year, multiple dry years, and average years, the MWD's water reliability analysis indicates that the region can provide reliable water supplies under both the single driest year and the multiple dry-year hydrologies. From 2020 through 2040, demand can be met utilizing groundwater and State Water Project supplies. The key component of MWD's supply capability is the amount of water in its large regional storage portfolio that includes both dry-year and emergency storage capacity (MNS Engineers, Inc. 2018).

Three plans are implemented to ensure reliable regional imported water supply: *Water Surplus and Drought Management Plan* (WSDM), *Water Supply Allocation Plan* (WSAP), and the *Emergency Storage Requirements Analysis*. The WSDM identifies the sequence of resource management actions that the MWD executes during surpluses and shortages. The WSAP provides a formula for allocating available water supplies to the member agencies in case of extreme water shortages. The *Emergency Storage Requirements Analysis* defines the actions necessary for a catastrophic interruption in water supplies (MNS Engineers, Inc. 2018).

The MWD responds to water quality concerns by protecting the quality of the source water and developing water management programs that maintain and enhance water quality. Contaminants that cannot be sufficiently controlled through protection of source waters must be handled through changed water treatment protocols or by blending. Each source has specific quality issues. High salinity levels remain a significant issue associated with State Water Project supply with emerging threats of uranium, perchlorate, and chromium-6. State Water Project supply key issues are disinfection byproduct precursors of total organic carbon and bromide. The MWD effectively mitigates

salinity by blending and has needed to upgrade its water treatment plants to deal adequately with disinfection byproducts (MNS Engineers, Inc. 2018).

The major regional water quality concerns include: salinity, perchlorate, total organic carbon and bromide (disinfection byproduct precursors), nutrients (as they relate to algal productivity), arsenic, uranium, chromium-6, and constituents of emerging concern (e.g., NDMA and PPCPs). The MWD has taken several actions and adopted programs to address these contaminants and to ensure a safe and reliable water supply, as referenced (MNS Engineers, Inc. 2018).

The City of Oxnard implements the Groundwater Recovery Enhancement and Treatment (GREAT) Program as a planning measure to meet the water demand of the rapidly growing city via water resources from groundwater injection, storage, recovery, and desalination and wastewater recycling and reuse, which includes the use of an Advanced Water Purification Facility (AWPF). The AWPF currently treats 6.25 million gallons per day (MGD) of wastewater from the Oxnard Wastewater Treatment Plant (OWTP) for non-potable (irrigation and industrial) uses and groundwater injection. Under this program, additional treatment facilities will be constructed to treat 12.5 MGD in the near term and 25 MGD in the longer term (City of Oxnard 2017). This water is supplied via the Recycled Water Backbone System, consisting of pipelines along Ventura Road (running north-south) and Hueneme Road (running east-west). The City sells this recycled water to agricultural users in exchange for groundwater allocations and injects it into the groundwater basin to create a barrier to seawater intrusion (City of Oxnard 2018a). The City is currently seeking approval of a demonstration indirect potable reuse project that will increase recycled water production to 7,000 AFY (City of Oxnard 2018a). These programs make more potable water available for other uses (drinking water, etc.) and will help the City meet its water supply demand (City of Oxnard 2018a).

### Potable Water Use

The Maulhardt Property currently has one water well that has been used to provide irrigation for existing row crops that is not treated to potable water standards (City of Oxnard 2012). When the City of Oxnard and the CMWD annexed the Maulhardt property in 2014, 161 acre-feet (AF) of groundwater was allocated to the City (Jensen Design and Survey, Inc. 2019b); however, it is not known what the actual current potable water usage is.

### Flood Hazard Zones

The Federal Emergency Management Agency (FEMA) is responsible for mapping areas subject to flooding during a 100-year flood event (i.e., one percent chance of occurring in a given year). Per the East Village Draft Environmental Impact Report (City of Oxnard 2012), the project Site is located outside of the 110- and 500-year floodplain and is not located in a seiche, tsunami, or mudflow risk area. As shown in the FEMA Flood Insurance Rate Map (FIRM) for Ventura County Incorporated Areas, the west half of the project Site is located within a Zone X, *Area of Minimal Flood Hazard* and the east half of the project Site is located in Zone X, *0.2 Percent Annual Chance of Flood Hazard*<sup>4</sup> (FEMA 2010). According to the Tsunami Inundation Map for Emergency Planning Oxnard Quadrangle prepared by the California Emergency Management Agency, California Geological Society, and the University of Southern California (2009), the project location is well outside of any tsunami inundation areas. No lakes, rivers, or other inland waters that could cause a seiche are located near the project. The County of Ventura has not identified “seiche zones” and the Ventura County General Plan, Hazards Appendix states that there is no historic record of a seiche occurring in Ventura County, although County residents experienced small seiches caused by swimming pools during the 1994 Northridge earthquake (County of Ventura 2013).

In response to the 2017 failure of the spillway at Oroville Dam, the 2017-2018 Ventura County Grand Jury (Grand Jury) investigated the condition of more than 20 dams in or adjoining Ventura County and found that 14 dams could cause significant loss of life and property if they failed. Four dams under California Division of Safety of Dams

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<sup>4</sup> Defined as, “Areas of 0.2% annual chance flood, areas of 1% annual chance flood with average depths of less than one foot or with drainage areas less than one square mile.”

(DSOD) jurisdiction were identified as having existing or potential deficiencies. The Grand Jury investigated the reasons for the deficiencies and what efforts are being made to correct them (Ventura County Grand Jury 2018).

The Grand Jury also reviewed how a dam failure would be handled by the County of Ventura. The Grand Jury concluded that although dam disaster response plans follow State guidance, they provide little or no guidance beyond the process of notifying dam management and the Ventura County OES. The Grand Jury concluded the dam owners and the OES were not offering public education regarding potential inundation areas, evacuation routes, or what to do in the event of a dam failure. The Grand Jury recommended educating the public and assisting residents in planning for dam failures (Ventura County Grand Jury 2018).

The Grand Jury also recommended that the OES work more closely with DSOD to monitor and evaluate safety for dams in or affecting Ventura County; track the progress of remedial action taken at Matilija Dam, Santa Felicia Dam, Castaic Dam, and Bouquet Canyon Dam; and report progress annually (Ventura County Grand Jury 2018). In response, the County stated that local inspections are conducted for all dams owned by the Ventura County Watershed Protection District before winter and during and after each storm. Additionally, as of March 2017, the Santa Clara River Levee in Oxnard was in the process of rehabilitation construction and undergoing design/engineering/CEQA work (City of Oxnard 2017b).

A dam that stores more than 1,000 AF of water, is higher than 150 feet, and has the potential to cause downstream property damage is classified as a *high hazard dam* by FEMA. A review of *Ventura County General Plan, Hazards Appendix* (County of Ventura 2013) and the *Multi-Jurisdictional Hazard Mitigation Plan for Ventura County, California* (County of Ventura 2015) indicates that there are four major reservoirs in the Santa Clara River watershed upstream (northeast) of the project Site that FEMA designated as “high hazard dams” that would inundate the project area in the event of a reservoir failure. The location of these reservoirs is identified in Figure 3-7 and information for each of these dams is summarized below.

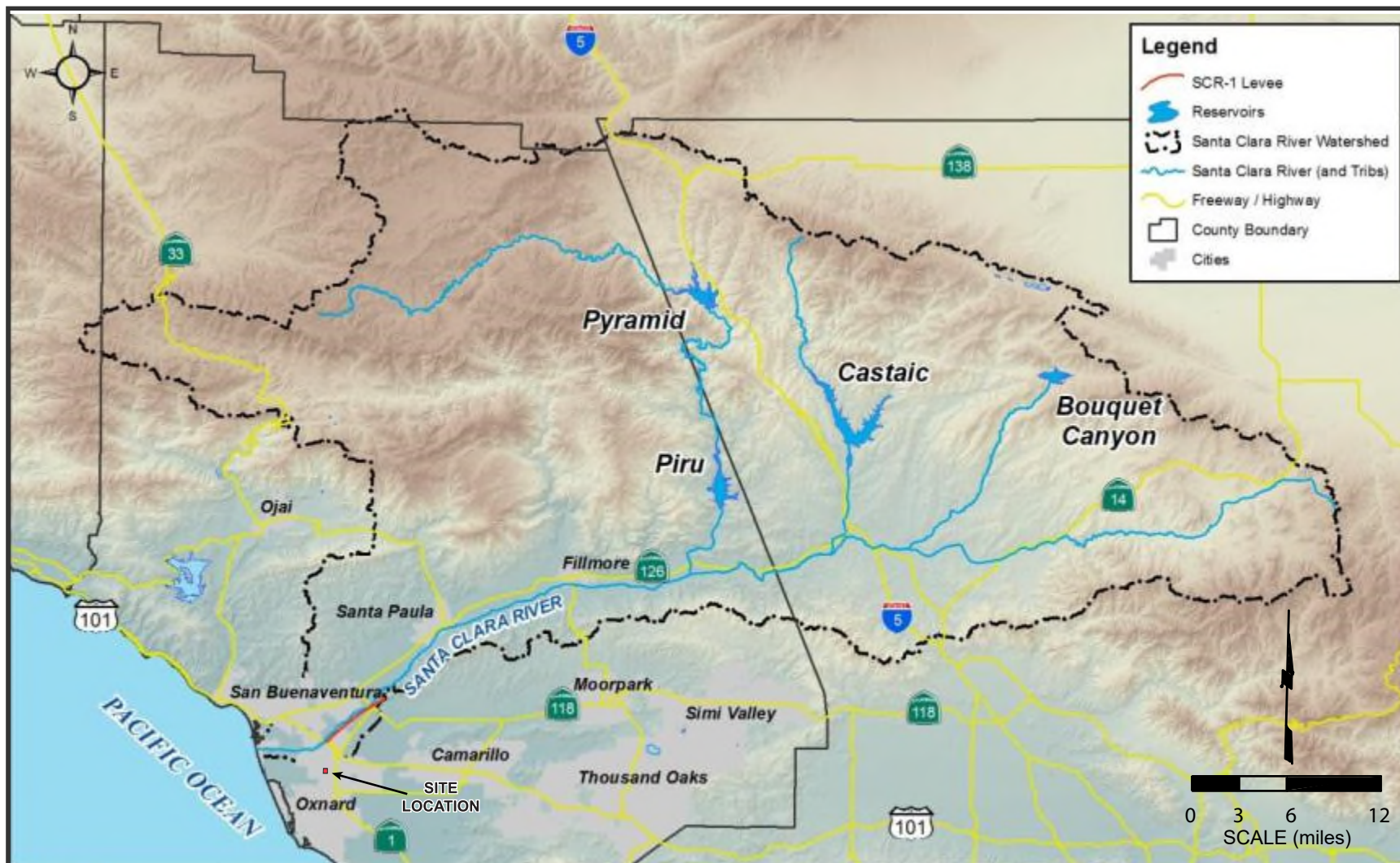
**Santa Felicia Dam.** The Santa Felicia Dam (Lake Piru), operated by the UWCD, can hold up to 100,000 AF of water, and is located on Piru Creek approximately 35 miles upstream of the Site. Data provided by the UWCD indicates that the Site would be inundated by flood waters between four and four and a half hours after the dam failure (UWCD 1974).

**Castaic Dam.** The Castaic Dam is operated by the California Department of Water Resources (CDWR), can hold up to 325,000 AF of water, and is located on Castaic Creek approximately 45 miles upstream of the Site (Figure 3-7). Data provided by the CDWR indicates that the Site would be inundated by flood waters between four and five hours after a failure of the Castaic Dam (CDWR 1975).

**Pyramid Dam.** The Pyramid Dam is operated by the CDWR, can hold up to 179,000 AF of water, and is located on Piru Creek approximately 20 miles upstream of the Santa Felicia Dam and 55 miles upstream of the Site (Figure 3-7). Data provided by the CDWR indicates that the Site would be inundated by flood waters between four and five hours after a failure of the Pyramid Dam (CDWR 1998).

**Bouquet Canyon Dam.** The Bouquet Canyon Dam is operated by the Los Angeles Department of Water and Power (LADWP), can hold up to 36,500 AF of water, and is located approximately 60 miles upstream of the Site (Figure 3-7). Data provided by LADWP indicates that the Site would be inundated by flood waters between five and five and a half hours after a failure of the Bouquet Canyon Dam (LADWP 2015).





MAJOR RESEVOIR LOCATIONS  
PROPOSED HIGH SCHOOL NO. 8  
OXNARD, CALIFORNIA



**TETRA TECH**

5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

JOB NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38846	07/31/19	JS/mb		3-7

MAP SOURCE: VENTURA COUNTY WATERSHED PROTECTION DISTRICT, FEBRUARY 2015

### 3.10.1.2 Regulatory Setting

#### Federal

In 1972, the Federal Water Pollution Control Act (commonly referred to as the Clean Water Act [CWA]) was amended to prohibit the discharge of pollutants into waters of the United States from any point source unless the discharge was compliant with a NPDES permit. The CWA was amended again in 1987 to require that U.S. EPA establish regulations for the permitting of storm water discharges (as a point source) by municipal and industrial facilities under the NPDES permit program. In 1990, the regulations were expanded to include construction projects that encompass five or more acres of soil disturbance and again in 1999 to lower the permitting threshold from five acres to one acre.

The CWA requires states to adopt water quality standards for water bodies, which consist of designated beneficial uses for a water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. If designated beneficial uses of a water body are being compromised by water quality, Section 303(d) of the CWA requires states to identify and list that water body as impaired. Once a water body is deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards. The terminating receiving water for the project Site (i.e., Ormond Beach) has one constituent (indicator bacteria) on the 303(d) list and is considered impaired; however, the January 2019 LARWQCB *Staff Report on Ventura Beaches Bacteria Modifications to the 2014-2016 Clean Water Act 303(d) List of Impaired Waters* states:

*Based on the analysis of the available data over a 19-year period, including the data used for the original listings of these beaches, Ormond Beach, ... should be removed from the section 303(d) list for indicator bacteria because the number of measured exceedances of enterococci and fecal coliform WQOs meets the conditions for delisting in the Listing Policy ...*

*Staff recommend removing Ormond Beach, ... from the 303(d) list of impaired waters for indicator bacteria. Because none of these beaches are included on the 303(d) list for other types of impairments, the Integrated Report Category will be Category 1, 'All assessed beneficial uses supported and no beneficial uses known to be impaired.'*

#### State

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and the nine RWQCB broad powers to protect water quality. The Porter-Cologne Water Quality Control Act authorizes the SWRCB and the nine RWQCBs to protect State surface water and groundwater quality through the NPDES programs and issue permits. California NPDES permits are also referred to as waste discharge requirements (WDRs), which regulate discharges to waters of the United States. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require clean-up of discharges of hazardous materials and other pollutants.

Each RWQCB must develop and adopt a water quality control plan for its region. The Los Angeles RWQCB adopted the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) (Los Angeles RWQCB 2014) for its region of responsibility, which includes the project Site. The Los Angeles RWQCB has delineated water resource area boundaries based on hydrological features and identified existing and potential beneficial uses for each of the water bodies described in the Basin Plan. The Basin Plan also establishes narrative and numeric water quality objectives and contains the State's anti-degradation policy for inland surface waters and groundwater. If these objectives are exceeded, the Los Angeles RWQCB can use its regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters. The



Los Angeles RWQCB implements the Basin Plan by issuing orders for investigation and cleanup or abatement at sites containing discharges of waste and by prohibiting certain discharges of waste in some areas. The Basin Plan is also implemented by encouraging water users to improve the quality of their water supplies, particularly where the wastewater they discharge is likely to be reused. The Rice Road Drain, Oxnard Industrial Drain, and downstream channel and slough do not have beneficial uses listed in the Basin Plan (Los Angeles RWQCB 2014).

All construction sites one acre or greater in size or are less than an acre, but part of a larger common plan of development, are subject to the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 20090009-DWQ, NPDES No. CAS000002*, known as the Construction General Permit (CGP) (SWRCB 2009), which regulates stormwater discharge from construction activities. The CGP requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that contains specific actions, known as best management practices (BMPs), to control the discharge of pollutants, including sediment, into Waters of the U.S. A Notice of Intent (NOI) to perform work under the CGP must be filed with the State, which certifies that the CGP requirements, such as pollution control, BMP inspections, water quality monitoring, and reporting, will be performed. The CGP also has a requirement to control post-construction runoff from new impervious surfaces created as part of the project to match pre-project hydrology in order to reduce impacts to receiving conveyances and water bodies. The CGP states, “This ‘runoff reduction’ approach is analogous in principle to Low Impact Development (LID) and will serve to protect-related watersheds and water bodies from both hydrologic-based and pollution impacts associated with the post-construction landscape.” The CGP contains Post-Construction Standards; however, it defaults to the post-construction standards of the overlying municipality if the municipality has its own standards (see discussion below regarding the City of Oxnard’s post-construction standards).

In order to terminate CGP coverage and file a Notice of Termination (NOT) with the State Water Board, the project must demonstrate that final stabilization has been reached (i.e., area disturbed by construction activities must be re-established to a uniform vegetative [or alternative permanent] cover equivalent to 70 percent coverage of the preconstruction vegetative conditions); all elements of the SWPPP must be complete; no greater potential for construction related pollutants to be discharged into the site runoff than pre-construction; all construction materials, equipment, wastes, and temporary and plastic-containing BMPs must be removed from the Site; compliance with Post Construction Standards must be demonstrated; and a post-construction control measure long-term maintenance plan must be established. The RWQCBs review the photographs provided with the NOT to confirm post-construction site conditions and may perform a site visit and/or inquire with the regulating municipality that post-construction standards and long-term maintenance requirements (discussed in Local subsection below) have been met in order to approve the NOT.

On April 7, 2015, the State Water Board adopted an *Amendment to the Water Quality Control Plan for Ocean Waters of California (Ocean Plan) to Control Trash* and *Part 1 Trash Provision of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries Plan*. Together, they are collectively referred to as the “Trash Amendments”. The purpose of the Trash Amendments is to provide Statewide consistency for the SWRCB’s regulatory approach to protect aquatic life and public health beneficial uses by focusing limited resources on high trash-generating areas. The Trash Amendments apply to all Municipal Separate Storm Sewer System (MS4) Phase I (and Phase II) permittees, such as the City of Oxnard. Upon reissuance or amendment, MS4 permits will contain trash control implementation requirements and compliance milestones to demonstrate progress toward 100 percent compliance with the Trash Amendments. The CGP will contain the prohibition of trash in storm water and non-storm water discharges when the permit is reissued.

Section 401 of the CWA requires that an applicant for any federal permit (e.g., a United States Army Corps of Engineers [USACE] §404 permit) obtain certification from the state that the discharge would comply with other provisions of the CWA and with state water quality standards. For example, an applicant for a permit under Section 404 of the CWA must also obtain water quality certification per Section 401 of the CWA. Section 404 of the CWA requires a permit from the USACE prior to discharging dredged or fill material into waters of the United States, unless such a discharge is exempt from CWA Section 404.1 For the proposed project area, the Los Angeles RWQCB must provide the water quality certification required under Section 401 of the CWA. Water quality

certification under Section 401 of the CWA, and the associated requirements and terms, is required in order to minimize or eliminate the potential water quality impacts associated with the action(s) requiring a federal permit. No wetlands have been identified in the proposed project area and, therefore, it is unlikely that the project would need a federal permit related to jurisdictional channels or wetlands (see Section 3.4, *Biological Resources*).

On June 6, 2013, the Los Angeles RWQCB adopted *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, Order No. R4-2013-0095, NPDES General Permit No. CAG994004* (Groundwater Discharge Permit). This permit regulates discharges of treated and untreated groundwater from construction to surface waters. This permit specifies the discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater dewatering during construction activities and drilling, construction, and purging of wells. Dischargers are required to collect and analyze representative groundwater samples and, based on the results, dischargers would be required to provide treatment for any toxic compounds detected above the applicable screening levels. To obtain coverage under the Groundwater Discharge Permit, each proposed discharger must submit an NOI.

The DSOD regulates state-size dams and inspects them annually to verify that they are in good operating condition and establishes the flood inundation limits resulting from a dam breach during the design storm. From this, Cal OES develops maps that contain flood-wave arrival time estimates and flood inundation areas and submits them to DSOD and local communities (County of Ventura 2015).

State of California SB 610 and 221 require municipalities to consider the availability of adequate water supplies for certain types of new develop projects. The SBs require the development of a Water Supply Assessment by either the water supplier or the lead agency for the project for the following:

- Proposed residential development of more than 500 dwelling units;
- Proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- Proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- Proposed hotel or motel of more than 500 rooms;
- Proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- Mixed-use project that falls in one or more of the above-identified categories; or
- Project not falling into one of the above-identified categories but would demand water equal to or greater than a 500-dwelling unit project.

The *East Village Phase III Annexation Draft Environmental Impact Report* (City of Oxnard 2012) states that the East Village project does not exceed the thresholds and, thus, a Water Supply Assessment is not required.

## Local

Since July 8, 2010, the County of Ventura has been subject to the *Waste Discharge Requirements for Storm Water (Wet Weather) and Non-Storm Water (Dry Weather) Discharges from the Municipal Separate Storm Sewer Systems (MS4s) with the Ventura County Watershed Protection District, County of Ventura, and the Incorporated Cities Within, Order No. R4-2010-0108, NPDES Permit No. CAS004002* (MS4 Permit) (Los Angeles RWQCB 2010). The VCWPD is the principal permittee and the City of Oxnard is a co-permittee, along with the County and all the other cities within the County. Part 4, Section E of the MS4 Permit includes Planning and Land Development requirements. The goal of the Planning and Land Development Program is to minimize runoff pollution typically caused by land development and protect the beneficial uses of receiving waters. To achieve this goal, the MS4

Permit requires new development and redevelopment to control pollutants, pollutant loads, and runoff volume emanating from impervious surfaces by limiting the effective impervious area (EIA) to five percent or less of the project area. New development and redevelopment must also be able to accommodate water from a 0.75-inch storm event with no water leaving the Site. These requirements must be achieved through implementing post-construction control measures.

The County developed the *Ventura County Technical Guidance Manual for Stormwater Control Measures (TGM)* (County of Ventura 2011, updated in 2015 and 2018). The TGM prescribes the use of stormwater management control measures for new development and redevelopment projects in the County of Ventura and the incorporated cities therein. The TGM includes guidance for mitigating potential water quality impacts from new development and redevelopment projects. Design criteria are further detailed in the *Ventura County Hydrology Manual* and the design calculator (VCWPD 2017).

OMC Chapter 22, Article XII relates to stormwater quality management. The article prohibits non-stormwater discharges into the City's MS4. OMC Section 22-219 requires a Stormwater Pollution Control Plan (SWPCP) for new development over four lots. The SWPCP requires implementation of BMPs to effectively prohibit the entry of pollutants from the construction-site into the storm drain system during construction. However, City of Oxnard Ordinance 2876 amends OMC Chapter 22, Article XII and it requires new and redevelopment projects to develop Post-Construction Storm Water Management Plans (PCSMPs) (Carollo Engineers 2015). The ordinance describes the required features of the PCSMP and requires the plan to follow the TGM and include engineering calculations.

The City of Oxnard reviews proposed project PCSMPs to confirm that they follow the TGM guidance. The City of Oxnard also requires a notarized *Declaration of Restrictive Covenant for Storm Water Quality Control Measures Maintenance and Access* to hold the property owner accountable for maintaining post-construction control measures and to authorize City access to the features for inspections, emergency issues, etc. (NPDES 2016).

The Ventura County Sheriff's Department OES is responsible for disaster coordination and planning including implementation of the County's Dam Failure Response Plan (County of Ventura 2013).

Per the City of Oxnard's CEQA Guidelines (2017), "Discussions and background information related to Hydrology and Water Quality are found in two chapters of the 2030 General Plan EIR (Infrastructure and Community Services and Safety and Hazards). The first chapter addresses water quality issues that may be associated with wastewater treatment discharges or other discharges that may involve water pollution, including the management of stormwater discharges. The Safety and Hazards chapter addresses hydrology issues associated with flooding, affecting the 100-year flood plain, and potential development in these areas. For all the issues within this topic, it was determined that the application of existing statutory and regulatory requirements and compliance with existing City and agency programs would address potential significant impacts."

### **City of Oxnard Water Neutrality Policy**

On January 15, 2008, the City of Oxnard adopted a policy that ensures mitigation measures are imposed as part of approval of new development, so that the associated demand remains consistent with available supplies (the Water Neutrality Policy). The net result of this policy is that project approvals include conditions that: a) control the pace of construction of any given project (and thus the pace at which water demand increases); b) allow participation in the contribution toward the development of additional water supplies that offsets the demand associated with the project; or c) suspend project approval until sufficient supplies are available to support the anticipated project demand. The Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. New development includes all planned (anticipated in the 2030 General Plan) and any unplanned future development. Under the policy, a development can be water neutral by meeting its projected demand through one or more of the following:

- Transfer of existing FCGMA groundwater allocations to the City;
- Contributing to increased efficiency by funding City water conservation programs;

- Funding recycled water retrofit projects; or
- Providing additional water supplies.

### ***City of Oxnard 2030 General Plan***

Chapters 4, 5, and 6 of the City of Oxnard 2030 General Plan (City of Oxnard 2011a) describes relevant goals and policies applicable to water supply and quality, stormwater drainage, water resources, and flood control. The relevant goals and policies applicable to new schools within the City, as applied to Hydrology and Water Quality as described in Chapters 3, 4, 5 and 6 of the City of Oxnard 2030 General Plan (2011) are described as follows.

### **General Plan Chapter 3 Community Development**

- Goal CD 8** Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.
- CD 8-10** **Timing of Large-Scale Development.** Consider at an early stage the infrastructure investment needs of large-scale developments to evaluate these needs as part of long-range water supply, conveyance, wastewater, and other relevant planning.
- Goal CD 16** Coordinated land use and infrastructure decisions with economic development.
- CD 16.4** **Evaluate Fiscal Impacts.** Evaluate the fiscal impacts of new development and encourage a pattern of development that allows the City to provide and maintain a high level of urban services (fire and police services, water, sewer, solid waste, transportation, parks, etc.) and community facilities as well as attract targeted businesses and a stable labor force.

### **General Plan Chapter 4 Infrastructure and Community Services**

- Goal ICS-1** Provision of adequate facilities and services that maintain service levels, with adequate funding.
- ICS-1.1** **Maintain Existing Service Levels.** Maintain the high priority of providing services to residents and visitors, and prevent deterioration of existing service levels.
- ICS-1.2** **Development Impacts to Existing Infrastructure.** Review development proposals for their impacts on infrastructure (e.g., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.
- ICS-1.4** **Infrastructure Conditions of Approval.** New development should not be approved unless:
- The applicant demonstrates adequate public services and facilities are available;
  - Infrastructure improvements incorporate a range of feasible measures that can be implemented to reduce all public safety and/or environmental impacts associated with the construction, operation, or maintenance of any required improvement;
  - Infrastructure improvements are consistent with City infrastructure master plans; and
  - Required infrastructure needed for future new development is self-funded.
- Goal ICS-11** Water supply, quality, distribution, and storage adequate for existing and future development.
- Goal ICS-11.5** **Sustainability of Groundwater Supply.** Support the policies of the Fox Canyon Groundwater Management Agency to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.
- Goal ICS-11.9** **Groundwater Extractions.** Continue to adhere to the recommendations of the Ventura County Regional Water Quality Planning Program regarding groundwater quality and extractions.

**Goal ICS-11.11 Water Quality.** Monitor water quality regularly to ensure that safe drinking water standards are met and maintained in accordance with State agencies with jurisdiction and EPA regulations and take necessary measures to prevent contamination.

**Goal ICS-11.13 Water Neutral Policy and Urban Water Management Plans.** Incorporate the City's Water Neutral Policy regarding new development into the 2010 Urban Water Management Plan and develop appropriate ordinances, policies, and/or programs to fully implement the policy.

**Goal ICS-12** Adequate capacity at the City Waste Water Treatment Plant to accommodate existing and future development.

**ICS-12.3 Wastewater Discharge Monitoring.** Monitor and ensure that discharges comply with approved permits.

**ICS-12.4** Wastewater Discharge. Treat all wastewater in compliance with approved discharge permits.

**ICS-12.5 Sedimentation Control.** Require by conditions of approval that silt and sediment from construction be either minimized or prohibited.

**Goal ICS-13** Adequately sized storm drain systems and discharge treatment, certified levees, and implementation of appropriate NPDES permits and regulations.

**ICS-13.1 100-year Floodplain.** Discourage development, major infill, and structural improvements (except for flood control purposes) within the 100-year floodplain as regulated by FEMA. Recreational activities that do not conflict with habitat uses may be permitted within the floodplain.

**ICS-13.2 Adequate Storm Drains and NPDES Discharge Treatment.** Provide storm drainage facilities with sufficient capacity to protect the public and property from the appropriate storm event and strive to meet stormwater quality discharge targets set by NPDES and related regulations.

**ICS-13.3 Stormwater Detention Basins.** Design stormwater detention basins to ensure public safety, to be either visually attractive or unobtrusive, provide temporary or permanent wildlife habitats, and recreational uses where feasible considering safety concerns.

**ICS-13.4 Low Impact Development.** Incorporate low impact development (LID) alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education.

### ***General Plan Chapter 5 Environmental Resources***

**Goal ER-5** Well managed water supply and wastewater treatment programs that together meet expected demand, prevent groundwater overdraft, and ensure water quality.

**ER-5.1 Wastewater Treatment.** Treat all wastewater in compliance with approved discharge permits.

**ER-5.2 208 Wastewater Control Plan.** Support updating the "208" Wastewater Control Plan to control urban and nonurban runoff.

**ER-5.3 Reducing Dependence on Groundwater.** The City shall maintain a minimal dependence on Basin 4A groundwater consistent with the GREAT Program and support the policies of the FCGMA to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.

**ER-5.4 Wastewater Monitoring.** Monitor all wastewater discharges on a periodic basis to ensure that discharges comply with approved permits.

**ER-5.6 208 Groundwater Plan.** Adhere to the recommendations of the 208 Plan regarding groundwater extractions.



- ER-5.7 Minimizing Paved Surfaces.** Require minimization and/or permeability of paved surfaces in new developments and replacement paving, where feasible.

#### **General Plan Chapter 6 Safety and Hazards**

- Goal SH-1** Minimal damage to structures, property, and infrastructure as a result of liquefaction and subsidence.
- SH-1.2 Minimize Subsidence Trends:** Avoid increases in the level of groundwater extraction as a method for meeting new water demands if the extraction leads to subsidence, or unless a comprehensive reinjection program is approved and implemented to offset extractions.
- Goal SH-3** New development required to take necessary precautions prior to any construction to mitigate hazards and protect the health and safety of the inhabitants.
- SH-3.1 Location of New Development:** Encourage new development to avoid areas with high geologic, tsunami, flood, beach erosion, and fire or airport hazard potential.
- SH-3.2 New Development Flood Mitigation:** As a condition of approval, continue to require new development to mitigate flooding problems identified by the National Flood Insurance Program and/or other expert information.
- SH-3.3 Updating Flood Insurance Rate Maps:** Continue to provide information to FEMA to ensure that FIRM are updated periodically.
- SH-3.4 Avoiding Blockage of Natural Drainage:** Continue to review development proposals to ensure that the capacity or ability of natural drainage is not impacted.

## **3.10.2 Impact Analysis**

### **3.10.2.1 Methodology**

Project impacts to hydrology and water quality were evaluated based on the proposed project's adherence to local, State, and federal standards; proposed land use; design; and proposed BMPs for control of surface runoff and reduction of pollutants in runoff. A desktop review was conducted of relevant documents, including:

- *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Los Angeles RWQCB 2014);
- *Technical Guidance Manual for Stormwater Quality Measures - New Development and Redevelopment Projects* (County of Ventura 2011, updated 2015 and 2018);
- *Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for Ventura County and Incorporated Areas* (FEMA 2010);
- *Ventura County General Plan, Hazards Appendix* (County of Ventura 2013);
- *2015 Urban Water Management Plan* (MNS Engineers, Inc. 2018);
- *Multi-Jurisdictional Hazard Mitigation Plan for Ventura County, California* (County of Ventura 2015);
- *City of Oxnard California 2030 General Plan, Goals and Policies* (City of Oxnard 2011a);
- *East Village Phase III Annexation Draft Environmental Impact Report* (City of Oxnard 2012);
- Inundation maps for the Santa Felicia Dam (UCWD 1974), Castaic Dam (CDWR 1975), Pyramid Dam (DCDWR 1998), and Bouquet Dam (LADWP 2015); and

- Various documents developed by Jensen Survey & Design, Inc., including: *Preliminary Water Demand Memorandum* dated July 2018; *Preliminary Drainage Report Northeast Community* dated July 9, 2018; *Water Demand Projections Maulhardt Property – Northeast Corner of Rose Avenue and Camino del Sol Oxnard, CA* (Projected Water Demand Letter) dated May 23, 2019; and *Maulhardt Property & Oxnard High School #8 Overall Hydrology Concept* (Hydrology Letter) dated April 29, 2019. The 2019 Jensen Design and Survey, Inc. letter reports are provided in Appendix J. Additional information based on direct statements and clarifications provided by Jensen Design and Survey, Inc. in August 2019, have also been incorporated.

### 3.10.2.2 Significance Thresholds

The thresholds for hydrology and water quality impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- *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 or through the addition of impervious surfaces, in a manner which would:*
  - i.) result in substantial erosion or siltation on- or off-Site;*
  - ii.) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*
  - iii.) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
  - iv.) impede or redirect flood flows?*
- *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*
- *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

### 3.10.2.3 Project Impacts

***Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

#### ***Construction Storm Water***

Construction of the proposed project would disturb approximately 49.75 acres. During construction, pollutants of concern include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Additionally, excavated soil would be exposed, so there would be an increased potential for soil erosion compared to existing conditions. Lastly, chemicals, petroleum products (such as paints, solvents, and fuels), and concrete-related waste could spill or leak and have the potential to be transported via storm runoff into downstream receiving waters (ultimately the Pacific Ocean). Since the project will disturb greater than one acre of land, the project must comply with the CGP. Pursuant to the CGP, the project a Site-specific SWPPP must be prepared that details construction BMPs for use during construction activities. Construction BMPs, as detailed in the project-specific SWPPP would include, but not be limited to, run-on and runoff controls, erosion and sediment controls designed to minimize erosion and retain sediment on-Site, and good housekeeping BMPs intended to prevent spills, leaks, and

discharge of construction debris and waste into receiving waters. The CGP requires weekly inspections, storm water monitoring, and reporting to ensure the BMPs are installed or implemented and effective. The proposed project includes a mix of landscaping and hardscape, which will prevent any increase risk of sediment discharge during the operation of the proposed project.

Due to the depth to groundwater (20 to 25 feet bgs) on-Site, it is not anticipated that the groundwater table would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Groundwater may contain high levels of total dissolved solids and other constituents that could be introduced to surface waters. Any groundwater dewatering performed during excavation would be completed in accordance with the Los Angeles RWQCB's Groundwater Discharge Permit. This permit requires testing and treatment (as necessary) of groundwater prior to its discharge off-Site. If perched groundwater is encountered during construction, then under Mitigation Measure HYDRO-1, the OUSHD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein to ensure that the project would not violate any water quality standards or waste discharge requirements.

### ***Post-Construction Storm Water***

In order to terminate CGP coverage by filing a NOT with the State Water Board, the project must demonstrate that final stabilization has been reached (i.e., area disturbed by construction activities must be re-established to a uniform vegetative [or alternative permanent] cover equivalent to 70 percent coverage of the preconstruction vegetative conditions); all elements of the SWPPP must be complete; no greater potential for construction related pollutants to be discharged into the Site runoff than pre-construction; all construction materials, equipment, wastes, and temporary and plastic-containing BMPs must be removed from the Site; compliance with the MS4 Permit's post-construction standards (pursuant to the TGM, County of Ventura 2015) must be demonstrated; and a post-construction control measure long-term maintenance plan must be established.

At the time of developing this Draft EIR, the design of the proposed project's post-construction control measures consisted of:

- Pre-treating runoff from the North and South Campus areas with a Downstream Defender (a circular manhole that is modified to separate sediment and heavy debris to the bottom of tank, keeping floatable pollutants like trash or grease on the top of the surface within the chamber, and releasing treated stormwater);
- Routing treated water from the Downstream Defender into an ADS Stormtech plastic chamber that will be installed under the basketball court area and into an infiltration system that will be installed under the varsity softball field;
- Bypassing allowable discharges past the ADS Stormtech system, although larger flows will be diverted into the infiltration system to meet City of Oxnard detention requirements; and
- Infiltrating and detaining runoff from the South Campus ADS Stormtech chamber under the parking lot.

Around the perimeter of the Site, the streets installed will be dedicated to the City and, in some areas, runoff from the streets will be directed to the high school SD system. A few areas cannot connect to the underground infiltration/detention systems due to the grade and layout of the Site. At the time of developing this Draft EIR, the street runoff volume that needed to be accounted for into the Site's total retention/infiltration volume had not been determined. Jensen Design & Survey, Inc. has proposed the incorporation of a treatment BMP, such as a grass swale or similar, but this had not been approved by the City of Oxnard at the time of developing this Draft EIR. However, at this time, it appears acceptable to mitigate the runoff volume from the areas that cannot be routed to the retention features by upsizing the North and South detention systems to retain this additional volume of runoff. A PCSMP, Design Criteria Checklist from Appendix G of the TGM, and Covenant for Maintenance of PCSMP that describes the post-construction features and calculations must be submitted to the City of Oxnard for review for all applicable new development projects. Additionally, the RWQCB will require verification of installation of the City-

approved post-construction control measures and development of the long-term maintenance agreement as part of the NOT approval process. The post-construction features constructed and maintained in accordance with the TGM would comply with water quality standards and mitigate hydrologic impacts incurred by the new impervious surfaces.

### **Wastewater**

The high school campus would generate domestic wastewater. The project would connect to the existing sanitary sewer main which conveys domestic wastewater to the OWTP. The OWTP, owned and operated by the City of Oxnard's Wastewater Division, is a secondary treatment facility located at 6001 South Perkins Road, Oxnard, California (City of Oxnard 2018b). The OWTP treats and discharges wastewater pursuant to *National Pollutant Discharge Elimination System Order No. R4-2013-0094*, adopted by the Los Angeles RWQCB on June 6, 2013. The proposed project would generate domestic wastewater from various sources, such as restrooms and food service facilities, and it would be treated by the OWTP.

With compliance with existing regulations including implementation of stormwater BMPs that target pollutants of concern in runoff from the project Site, implementation of Mitigation Measure HYDRO-1, and connection to the OWTP, the potential for violation of water quality standards or waste discharge requirements and degradation of water quality would be less than significant.

### ***Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

During construction, it is not anticipated that the groundwater table, which is 20 to 25 feet bgs, would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Any groundwater dewatering performed during excavation would be temporary, not result in a substantial volume removed, and completed in accordance with the Los Angeles RWQCB's Groundwater Discharge Permit. Grading and construction activities would compact soil, and construction of structures would increase impervious area, which can decrease infiltration during construction. However, construction activities would be temporary, and the reduction in infiltration would not be substantial relative to Semi-Perched Zone or the UAS and LAS that are the principal groundwater sources for the Oxnard Plain Groundwater Basin. The UAS and LAS are recharged through infiltration in the Oxnard Forebay area (Figure 3-6). Therefore, construction of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Construction impacts related to groundwater supplies would be less than significant, and no mitigation is required.

During the Maulhardt property's 2014 annexation by the City of Oxnard, 161 AFY of groundwater were allocated to the City. The project's water will be supplied by the City of Oxnard and it will not pump groundwater directly from the underlying aquifer. The project Site's current agricultural uses are irrigated solely with well water (City of Oxnard 2012). The total annual water use for farming 100 acres of strawberries and other row crops is estimated at 250 AFY (City of Oxnard 2012); therefore, this volume of water that is currently drafted from the aquifer will not be drafted in the future and thus, would not impede groundwater management of the underlying aquifer. It is not known to what extent the agricultural crop irrigation contributed to groundwater recharge. However, a portion of the proposed project's wastewater will be treated at the POTW, treated at the AWPF, and injected into the groundwater basin. Irrigation of landscaping and athletic fields will be supplied by the public water lines, with a separate connection to the main line, and will likely contribute to groundwater recharge. Therefore, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operation impacts related to groundwater supplies would be less than significant, and no mitigation is required.

### **Potable Water Sources**

Water for proposed project will be supplied by the City of Oxnard on a looped system. There will be four connections to the existing water mains. Two connections will be in Camino del Sol on the existing 12-inch line, at each end of the high school Site. One connection will be at the northeast corner of the high school property to an existing 8-

inch line in Jacinto Drive. The final connection will be to the existing 12-inch line in Rose Avenue at Camino del La Luna. The looped system will be constructed with 8-inch main lines in Central Street and the Public Road on the east side of the high school. A public line will also loop through the Site to serve fire hydrants. The approximate projected use for the high school is 67 AFY. On average, the daily flow rate is projected to be approximately 56,500 gallons per day.

In addition to local groundwater, the City of Oxnard obtains groundwater from the UWCD and imported water from CMWD, which are treated, blended, and supplied to consumers. The City also plans to expansively use recycled water for municipal uses, which will allow for additional supply for other uses. The City of Oxnard produces recycled water at the AWPf and delivers it via the Recycled Water Backbone System (MNS Engineers Inc. 2018). The City of Oxnard requires selected new development projects to design and construct dual piping systems within their project areas to facilitate the delivery of recycled water for non-potable uses, such as irrigation of landscaping and athletic fields.

### **Neutrality**

The City of Oxnard's historical water supply has fluctuated between 26,919 and 28,826 AFY or an upper limit of 25 million gallons per day (MNS Engineers, Inc. 2018). The projected water supplies in the *Urban Water Management Plan* are 40,341-acre feet for 2020, 54,341-acre feet for 2025, 2030, 2035, and 2040 (MNS Engineers, Inc. 2018). The City's actual 2015 water usage was 119 (adjusted) gallons per capita per day (GPCD) which achieved the City's 2015 Interim Target GPCD (139 GPCD). Per the City of Oxnard's Public Works *Integrated Master Plan, Water Project Memorandum 2.2, Water Demand Projections, Revised Final Draft* (Carollo Engineers 2017), the projected water use through 2040 is 132 GPCD. The memorandum also states that the majority of the future demand is associated with existing customers and it assumed this demand remains constant, which is a conservative assumption since additional water conservation is likely to occur by year 2040. It allots approximately 11 MGD with new development, which equates to about 30 percent of the total 2040 demand.

Jensen Design & Survey, Inc. developed a *Preliminary Water Demand Memorandum* (2018) that calculated the water demand for the high school to be 2.3 AFY/acre (estimated from the *Teal Club Specific Plan EIR*, City of Oxnard 2015, per the Jensen Survey & Design, Inc. memorandum), which would result in 114.43 AFY. The memorandum states that demand estimated from the average water bills for Oxnard and Channel Island High Schools (including irrigation) was 67 AFY; the memorandum also states the rounded estimate from Hensley High School Architects, which was 56 AFY. The City of Oxnard *2030 Master Plan* uses a demand of 1,500 gallons (0.0046 AF) per day per acre as the planning level consumption for school sites, based on the average water consumption of school sites located in the City of Oxnard and increased to account for future fluctuations, which extrapolates to 78 AF.

The 100-acre Maulhardt Property was annexed into the City of Oxnard and the MWD in 2014. Per Jensen's *Projected Water Demands Letter* to Tetra Tech (2019), although the City of Oxnard's *Urban Water Master Plan* includes the Maulhardt Property and the Site was allocated 161 AF of groundwater within the annexation, it does not specify specific projected water usage for the Site and therefore, Jensen Design & Survey, Inc. cannot determine at this time whether the supply is sufficient to meet the estimated demand of 67 AFY (2019). However, if it is assumed that the calculation for water demand for the high school is correct (2.3 AFY/acre [estimated from the *Teal Club Specific Plan EIR*, City of Oxnard 2015, per the Jensen Survey & Design, Inc. memorandum]), which would result in 114.43 AFY as the total demand for the high school, and 161 AFY is the allotted supply, the proposed project's water demand will not exceed the estimated supply.

The East Village Draft EIR states that the East Village community could demand up to 324 AFY and when the current estimated agricultural extraction is subtracted, it would be an additional 163 AFY of demand from the exiting use to the future use (City of Oxnard 2012). This additional volume has been accounted for in the overall planned water demand increase for Oxnard and water supplies identified in the *East Village Draft Environmental Impact Report* (Eco Tierra Consulting 2012). The City of Oxnard developed a credit bank for use during extended drought or water supply restricted conditions and will gradually restore its groundwater credit bank as a buffer against future



supply constraints with the GREAT Program (City of Oxnard 2012). It is anticipated that reasonably-projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection are sufficient to meet the water demand associated with the project, in addition to the City's existing and planned future uses (City of Oxnard 2012). Furthermore, the City of Oxnard imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City of Oxnard Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The requirements of the City of Oxnard Water Neutrality Policy are included in the proposed project's water allocation analysis (Jensen Design and Survey, Inc. 2019b). The City is requiring the project to present a plan for water neutrality. Thus, with the implementation of Mitigation Measure HYDRO-2, the proposed project's impacts on groundwater supply would be less than significant.

***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 or through the addition of impervious surfaces, in a manner which would:***

***i.) result in substantial erosion or siltation on- or off-Site?***

During construction activities, the project Site would be graded and excavated, exposing soil and increasing the potential for soil erosion compared to existing conditions. During a storm event, soil erosion and sedimentation could occur at an accelerated rate. For example, excavation activities result in soil stockpiles, which has the potential to be washed into storm drains, blown off-Site by wind, or tracked off-Site by heavy equipment. In addition, construction activities would compact soil, and construction of structures would increase the impervious area, which can increase runoff during construction. Since the project will disturb greater than one acre of land, the project must comply with the CGP. Pursuant to the CGP, a Site-specific SWPPP must be prepared that details construction BMPs for use during construction activities. Construction BMPs would include, but would not be limited to, erosion and sediment controls designed to minimize substantial erosion or siltation. Prior to terminating coverage under the CGP, the project Site must be stabilized and not pose any additional sediment discharge risk than it did prior to the commencement of construction activity. The proposed project includes a mix of landscaping and hardscape that will minimize erosion. Implementation of the Site-specific SWPPP during construction activities would reduce the potential for altering drainage patterns or causing flooding to less than significant levels during construction. Additionally, much of the runoff from the Site will be retained and/or treated within post-construction control measures. Therefore, the proposed project will not result in substantial erosion or siltation on- or off-Site.

***ii.) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?***

There are no on-Site streams or rivers; therefore, the project would not alter the course of a stream or river. Although the existing drainage pattern of the Site would be substantially altered, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion, sedimentation, or flooding on- or off-Site with compliance with existing regulations and the MS4 Permit's post-construction standards. Operational impacts related to on- or off-Site erosion, siltation, and flooding would be less than significant and no mitigation is required.

***iii.) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

Currently, storm water discharges through agricultural ditches and ultimately flows to Rice Road Drain. The proposed project will route storm water from pervious and impervious surfaces via storm drain inlets, curbing, and piping and will continue to discharge to the Rice Road Drain construction. The City of Oxnard will hold the Maulhardt Property (and therefore, the proposed project) to the 1 cfs/ac runoff discharge rate,

consistent with the 1987 Rice Road Watershed Agreement referenced in Jensen Design & Survey, Inc.'s *Hydrology Letter* (Jensen Design and Survey, Inc. 2019a). The remaining runoff is designed to be retained on-Site. The 1 cfs/ac flow rate was deemed an acceptable flow rate to prevent downstream flooding of the receiving water (Rice Road Drain) and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems.

The proposed project would change on-Site drainage patterns by adding impervious surface areas, including buildings and parking lots, and constructing drainage structures. The proposed project would result in at least 32 acres of increased, permanent impervious surface area. An increase in impervious area would increase the volume of runoff during a storm, which would more effectively transport pollutants to receiving waters. As stated above, the proposed features include pre-treatment of runoff from the North and South Campuses with *Downstream Defender* hydrodynamic separators. The treated water would then flow into ADS Stormtech plastic chambers that will be installed under the basketball court area (North Campus) and the parking lot (South Campus). The North Campus will also have an infiltration system under the varsity softball field. Allowable discharges will bypass the ADS Stormtech system, but larger flows will be diverted into the infiltration system to meet City of Oxnard detention requirements. A portion of the runoff from the streets that will be constructed and dedicated to the City of Oxnard and surrounding the Site will be mitigated by upsizing the North and South Campus detention systems to retain this additional volume of runoff. Through a combination of these stormwater control measures, both on-Site and off-Site flooding will be controlled. Operational impacts related to capacity of stormwater drainage systems would be less than significant and no mitigation is required.

***iv.) impede or redirect flood flows?***

Although the project's new impervious surfaces would change the hydrology of the Site and off-Site runoff, post-construction features are specifically designed to prevent alteration of downstream watercourses and restrict flood potential. Additionally, the Site's stormwater conveyance features will be sized to the allowable flow rate for the Rice Road Drain (i.e., one cfs/ac), which is designed to prevent downstream flooding. Therefore, both on-Site and off-Site flooding will be controlled.

Because the project area is outside the 100-year flood zone, it is not within a flood hazard area. Additionally, the project would not involve placing structures that would impede or redirect flood flows within a 100-year flood hazard area. Therefore, the proposed project would not place within a 100-year flood hazard area structures that would impede or redirect flow and project impact would be less than significant.

***In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?***

***Flood Hazard***

According to *Ventura County General Plan Hazards Appendix*, Figure 2.10, *1% Annual Chance Floodplain*, the project is located outside of the 1% annual chance floodplain (also referred to as the 100-year floodplain), which are established by the FEMA (County of Ventura 2013).

As shown in the FEMA FIRM for Ventura County Incorporated Areas, the west half of the project Site is located within a Zone X, *Area of Minimal Flood Hazard* and the east half of the project Site is located in Zone X, *0.2 Percent Annual Chance of Flood Hazard*<sup>5</sup> (FEMA 2010).

However, as stated above, recommendations by the Grand Jury investigation that was initiated after the 2017 failure of the spillway at Oroville Dam consisted of directing the OES to provide dam safety public education; assist

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<sup>5</sup> Defined as, "Areas of 0.2% annual chance flood, areas of 1% annual chance flood with average depths of less than one foot or with drainage areas less than one square mile."

residents in planning for dam failures; work more closely with DSOD to monitor and evaluate safety for dams in or affecting Ventura County; track the progress of remedial action taken at Matilija Dam, Santa Felicia Dam, Castaic Dam, and Bouquet Canyon Dam; and reporting progress annually (Ventura County Grand Jury 2018). Local inspections are now conducted at all dams owned by the Ventura County Watershed Protection District before winter and during and after each storm. As of March 2017, the Santa Clara River Levee in Oxnard was in the process of rehabilitation construction and undergoing design/engineering/CEQA work (City of Oxnard 2017b).

With continued inspections of the dams, rehabilitation of the dams as needed, and the implementation of the Grand Jury recommendations, risk of an incident similar to the Oroville Dam spillway failure would be mitigated. Additionally, compliance with Mitigation Measure HYDRO-3, which requires OUHSD to develop and implement a Site-specific flooding evacuation plan to be implemented in conjunction with the OES *Dam Failure Response Plan*, project impacts would be less than significant.

### ***Tsunami and Seiche Hazard***

According to the *Tsunami Inundation Map for Emergency Planning Oxnard Quadrangle* prepared by the California Emergency Management Agency, California Geological Society, and the University of Southern California (CalEMA et al. 2009), the project location is well outside of any tsunami inundation areas.

No lakes, rivers, or other inland waters that could cause a seiche are located near the project. The County of Ventura has not identified “seiche zones” and the *Ventura County General Plan, Hazards Appendix* states that there is no historic record of a seiche occurring in Ventura County, although County residents experienced small seiches caused by swimming pools during the 1994 Northridge earthquake (County of Ventura 2013).

Therefore, tsunamis and seiches are not considered to be potential hazards to the Site and there is no impact.

### ***Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

The Oxnard Plain Basin is the primary source of groundwater supplying Oxnard’s service area. The FCGMA allocates and limits groundwater extraction volumes to address overdraft and to bring the basins to “safe yield” (when groundwater extraction from a basin are approximately equal to annual replenishments of water into the groundwater basin; the safe yield estimate for the FCGMA area is approximately 120,000 AFY), mostly to halt groundwater intrusion (MNS Engineers, Inc. 2018).

The completion of the Sustainable Groundwater Management Plan (SGMP), currently being developed by the FCGMA, will address the long-term sustainability of the basin for municipal and agricultural pumpers. The SGMP will contain historical data, groundwater levels, groundwater quality, subsidence, groundwater-surface water interaction, historical and projected demands and supplies, recharge areas, measurable objectives, interim five-year milestones, a sustainability goal, and a plan to achieve the goal in 20 years, with a 50-year planning and implementation horizon. The draft plan was released in November of 2017 and additional modeling was conducted from 2017-2018. The FCGMA has not provided a date of completion for the SGMP. As discussed previously, the Maulhardt Property’s groundwater allocations were transferred to the City of Oxnard and the project area was incorporated into the SGMP. In addition, project impacts related to groundwater supplies would be less than significant. Therefore, the project is not expected to conflict with the SGMP and project impacts to the sustainable groundwater management plan will be less than significant.

### **3.10.2.4 Cumulative Impacts**

The project’s contribution to cumulative impacts to hydrology and surface water quality would be less than significant. The cumulative impacts of the proposed project on hydrology and water quality are:

**Surface Water.** The project would create an alteration of the City’s storm water drainage features associated with the project Site and increase in total impervious surface. This would increase total runoff volume and peak flow to Rice Road Drain. This will be mitigated by the project’s proposed post-construction features, which are required by

the Construction General Permit and the City's MS4 Permit, will follow the Technical Guidance Manual (County of Ventura 2011, updated 2015 and 2018), will be defined in the PCSMP, and vetted by the City of Oxnard. At the time of developing this Draft EIR, the precise routing of the storm water drainage features and discharge location to Rice Road Drain had not been finalized. However, the design to the storm water drainage features will be required to comply with the 1 cfs/ac flow rate to prevent downstream flooding of the receiving water (Rice Road Drain) and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems. Therefore, the project's contribution to cumulative storm water drainage impacts would be less than significant.

**Groundwater.** The project is not anticipated to impact groundwater quality. Impacts to groundwater quantity may be lower upon completion of the project in comparison to the volumes pumped directly from the groundwater basin to irrigate the agricultural fields. The City and the UWCD pump groundwater from the basin, but supplied water is also sourced from the State Water Project and recycled water from the Backbone system. Additionally, the City received the 161 AFY groundwater allocation as part of the annexation. Given the project's plan for water neutrality, as required by the City, the increase of demand in City water supply will be mitigated. Therefore, the project's contribution to groundwater impacts would be less than significant.

**Flooding.** The project Site is located outside of the 100-year and 500-year floodplain, is not within a levee or flood risk area, and it not in a seiche, tsunami, or mudflow risk area. The project will discharge no more than the City-required 1 cfs/ac to Rice Road Drain to avoid flooding impacts downstream (Jensen Survey & Design, Inc. 2019). Given the installation of post-construction features described above, the project would not impact increase overall flood potential in the City. Therefore, the projects contribution to cumulative flooding impacts would be less than significant.

### 3.10.2.5 Mitigation Measures

**HYDRO-1:** If perched groundwater is encountered during construction, the OUHSD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein.

**HYDRO-2:** The project shall meet its City of Oxnard Water Neutrality Policy requirements by completing at least one of the following:

- Transfer of existing FCGMA groundwater allocations to the City;
- Contributing to increased efficiency by funding City water conservation programs;
- Funding recycled water retrofit projects; or
- Providing additional water supplies.

**HYDRO-3:** The OUHSD shall develop and implement a Site evacuation plan to be implemented in conjunction with the County of Ventura OES Dam Failure Response Plan.

### 3.10.2.6 Level of Impact After Mitigation

With implementation of Mitigation Measures HYDRO-1 through HYDRO-3, project impacts would be less than significant.

## 3.11 LAND USE AND PLANNING

This section describes the proposed project's potential land use impacts based on whether the project would conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As noted in the Initial Study (Appendix A), potential project impacts associated with physically dividing an established community were found to be less than significant and are not discussed further in the EIR.

### 3.11.1 Environmental Setting

#### 3.11.1.1 Existing Conditions

##### Property Land Use Background

The City of Oxnard is located in the western central section of Ventura County and is the County's largest city in terms of land area and population, consisting of 26.9 square miles in 2010 (17,230 acres). The City's Planning Area includes an additional 43.0 square miles (27,526 acres), which is largely for agricultural production (City of Oxnard 2012). The City has grown from a small town surrounded primarily by agriculture to a city supporting a variety of uses. Existing land uses within the City's Planning Area include residential, commercial, industrial/ business and research park, open space, parks/recreation, airport, school, and agricultural uses. Most of Oxnard's developed land consists of residential and industrial uses.

The 2030 General Plan designates the Maulhardt Property with an Urban Village overlay. Urban Villages are envisioned to be developed with moderate to high-density residential units, as well as land uses which are intended to be complementary and include a variety of uses. Urban Villages are also characterized by mixed-use development, promoting a unique sense-of-place as well as enhanced development features, integrated development, and pedestrian-oriented design (Oxnard 2019).

In addition to the Urban Village designation, the 2030 General Plan land use map of the Maulhardt Property anticipates a 30-acre park at the northerly portion of the lot, residential development between 7 to 12 units per acre (approximately 460 to 790 units), linear parks, and general commercial development. The 2030 General Plan also describes the East Village Urban Village as "primarily residential with neighborhood services, including public uses still needed for the NECSP, such as parks, schools, etc." The Maulhardt Property is the third phase and final buildout of the NECSP (Oxnard 2019).

The 107-acre Maulhardt Property was annexed into the City in 2013 via Planning & Zoning Permit No. 10-61001 (Annexation) and is located within the NECSP, adopted in 1993. Pre-zoning of the property was also approved in 2013 via PZ No. 10-560-01 to align the zoning with the underlying land use designations in the NECSP. An Environmental Impact Report (EIR No. 11-01) was certified for the 2013 Annexation project (City of Oxnard 2019a).

The 1993 NECSP anticipated development of 403 single-family units at a density of 4.5 units per acre, a six-acre neighborhood commercial shopping center and associated streets and linear parks on the subject property. Although not indicated in the NECSP, the City's General Plan indicated that 30 acres of the Maulhardt Property was to be set aside for park purposes. However, there was not a specific requirement that the land be dedicated to the City or developed by the eventual developer of the Maulhardt Property (City of Oxnard 2019b).

On April 18, 2018, the owners of the Maulhardt Property (Owners) entered into a Purchase and Sale Agreement with the OUHSD for the sale of 51.8 acres of the Maulhardt Property for a new high school. Per the current vesting deed (20171124-00152497 O.R.), the existing parcel at the northeast corner of Rose Avenue and Camino Del Sol (APN 214-0-020-595) is essentially one large rectangle with the exception of some road right-of-way dedications along the north side of Camino Del Sol and the east side of Rose Avenue (near Camino Del Sol).

The California statutes pertaining to Subdivision Map Act state that the transfer in ownership of a portion of existing parcel, to a public agency, may be accomplished by recordation of a proper grant deed without the necessity of a subdivision map. The OUHSD qualifies as 'a public agency', relative to these statutes. After the recordation of the



grant deed transferring title of the school Site parcel to the OUHSD, the remaining portions of the original 'rectangle' will consist of two separate (non-adjointing) parcels; one northerly of the school Site parcel and one at the northeast corner of Rose Avenue and Camino Del Sol. These remaining parcels are not part of the proposed project. If necessary, a Certificate of Compliance can be recorded covering both of these parcels.

A school on the project Site was not considered as part of the NECSP. The Owners' representative coordinated with the District regarding a revised conceptual development for the remaining land within the Maulhardt Property (City of Oxnard 2019b). As part of a pre-application review, the proposal was presented to the City Council on December 18, 2018. City staff subsequently provided the District and the Owners' representative with a detailed summary of City Council comments, including the comments provided by the public. Staff also entered into extended discussions with the District and Owners in an effort to reach an acceptable solution under which a minimum of 30-acres of park space and recreation facilities would be provided within the Maulhardt Property (City of Oxnard 2019b).

On March 19, 2019, the City Council considered the revised concept as part of a Pre-Application review.

The conceptual development for the remaining land within the Maulhardt Property would include:

- *Project Density and Land Use Design:* Residential density increased to a range of 900 to 1,100 units. The proposed densities range between 28 and 34.3 units per acre. Residential development would consist of a variety of multi-family housing types (townhomes, apartments, condominiums, etc.). No single-family development was proposed. The variety of housing types provided is consistent with the Urban Village design principles.
- *Parks and Open Space Concept:* The proposed 5.4-acre expansion to East Village Park would be dedicated to the City and would expand the park to 11.4 acres. A one-acre park would also be provided at the Maulhardt Farmhouse, plus 5.5 acres of expanded street frontage and interior paseos. Based upon proposed public use of OUHSD facilities, approximately 33 acres of parks, paseos, open space, sports fields, and associated facilities would be proposed within the Maulhardt Property.

The OUHSD Project would include:

- *Public Use of OUHSD Facilities Pursuant to a Civic Center Act Agreement (CCA):* The District proposed 20.3 acres of sports facilities, recreational areas, and parking for scheduled public use and use by organized groups as an amenity to the community.

Under the terms of the agreement with the District, the District would make approximately 20.3 acres within the project Site available for public use pursuant to the CCA (Education Code Section 38130 et seq.) until June 30, 2069, with additional extensions available thereafter. The District would have the right to charge for the use of its facilities consistent with the CCA, although in certain circumstances (as is the case at the District's other high schools) free public use would be allowed (City of Oxnard 2019b).

Under the terms of the proposed agreement with the Owners, the Owners would agree to improve and dedicate to the City or its designee the amount of park and open space outlined above (a 5.4-acre expansion to East Village Park; a one-acre park provided at the Maulhardt Farmhouse, plus 5.5 acres of expanded street frontage and interior paseos). This acreage of proposed parks, greenbelts and paseos is substantially higher than originally proposed by the Owners and represents a higher amount of park acreage than the City would otherwise be able to require under the existing densities allowed by the Specific Plan or the higher densities proposed by the Owners in their latest proposal. Approval of the subject agreement with the Owners, does not pre-commit the City approving a future development permit for the subject area. Furthermore, it does not pre-commit the City to any higher residential densities or uses other than what are currently allowed under the Specific Plan. Any future development for the residential and commercial areas would require environmental review and an amendment to the Specific Plan, including subsequent City Council approval (City of Oxnard 2019b).

At the City Council Meeting held on July 19, 2019, the City approved, and the mayor signed on the City's behalf two agreements relating to the 107-acre Maulhardt Property:

1. Agreement between Oxnard Union High School District and City of Oxnard for Community Use of Facilities; and
2. Agreement Affecting Real Property (Agreement for Mitigation of Park Requirements).

### **Land Use Designations**

The project Site has a General Plan Land Use designation of RLM, Commercial General (CG), and OS with an Urban Village overlay.

The project Site is zoned R1-PD (Single Family Planned Development), C2-PD (General Commercial Planned Development), and C-R (Community Reserve) consistent with the NECSP land use designations.

### **3.11.1.2 Regulatory Setting**

#### **Federal**

No federal policies or regulations pertaining to land use are applicable to the proposed project.

#### **State**

No state policies or regulations pertaining to land use are applicable to the proposed project.

#### **Local**

##### ***City of Oxnard 2030 General Plan***

The City of Oxnard 2030 General Plan contains the goals and policies that are intended to guide a wide range of public and private development decisions through 2030. A city's General Plan is a comprehensive and long-range plan for its physical development. The choice of the planning horizon is up to each city but is usually at least 20 years. The 2030 Oxnard General Plan sets out a vision to guide future development in the City to the year 2030. The 2030 General Plan includes the seven State-required elements (land use, circulation, housing, open space, conservation, safety, and noise) within five chapters, each divided into two parts: (1) Background and (2) Goals and Objectives. The City of Oxnard has produced a Background Report as well as a Goals and Objectives document. The Background Report was completed in 2006 and presented a detailed description of the City and the Planning Area in a wide range of topic areas. The Goals and Policies document contains the actions (i.e., policies) needed to achieve the vision expressed in terms of specific goals. The Goals and Policies document is divided into nine chapters. Each chapter contains an introduction, definitions, and goals and policies numbered according to the topic they address. The Goals and Policies document is intended to be used as a decision-making tool for City officials in day-to-day and long-term strategic planning and operations.

##### ***NECSP (and Plan)***

The NECSP established the general type, location, parameters and character of land uses and development within the specific plan boundaries, while allowing for flexible design of subsequent individual projects that are consistent with the NECP, as amended.

### **3.11.2 Impact Analysis**

#### **3.11.2.1 Methodology**

Review the proposed project for consistency with the 2030 General Plan and other adopted environmental goals and policies. Review the description of the proposed project, including the proposed land use or activity, and the size, density and intensity of the operation. Review specific plans for urban design compatibility programs or regulations and their relevance to project design.

The following factors were considered:

- Whether the proposed project is inconsistent with the adopted land use/density designation in the specific plan for the Site
- Whether the proposed project is inconsistent with the 2030 General Plan or adopted environmental goals or policies contained in other applicable plans

### 3.11.2.2 Significance Thresholds

The thresholds for land use impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

### 3.11.2.3 Project Impacts

***Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

The project Site is zoned R1-PD, C2-PD, and C-R consistent with the NECSP land use designations. A school is not consistent with current NECSP land use designations for the project Site. Under the terms of the CCA with the District and associated Maulhardt Agreement, a higher amount of park acreage would be provided than the City would otherwise be able to require under the existing densities allowed by the Specific Plan (City of Oxnard 2019b). Approval of the subject agreement with the Owners did not pre-commit the City to approving a future development permit for the remaining land within the Maulhardt Property. Furthermore, it does not pre-commit the City to any higher residential densities or uses other than what are currently allowed under the Specific Plan. Any future development for the residential and commercial areas would require environmental review and an amendment to the Specific Plan, including subsequent City Council approval (City of Oxnard 2019b).

Notwithstanding a General Plan or Zoning Amendment, School Districts are not required to comply with the local building ordinances, except for city and or county ordinances for (1) regulating drainage improvements and conditions; (2) regulating road improvements and conditions; and (3) requiring the review and approval of grading plans, to the extent such ordinance provisions relate to the design and construction of on-Site improvements that affect drainage, road conditions and traffic flow.

The District is coordinating with the City relative to conformance of its Site use with the existing General Plan and zoning ordinances pursuant to Government Code Sections 65402 and Public Resources Code Section 21151.2. A consistency analysis with relevant General Plan land uses policies is provided in Table 3-13.

**Table 3-13.** City of Oxnard General Plan Consistency Analysis

Applicable GP Land Use Goals and Policies	Consistency Analysis
<b>Goal CD-1: Balanced Community:</b> A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.	<b>Consistent.</b> The proposed project is a comprehensive neighborhood high school to meet the educational needs of OUHSD students. In addition, a CCA is in place with the City to provide additional recreation opportunities to the community as well as civic center use of other school facilities on Site, outside of school hours. Facilities proposed for community use under the CCA include practice fields, JV baseball and softball fields, pool, outdoor basketball courts, tennis courts, performing arts center, and parking. Refer to Figure 2-4 for CCA areas.

Applicable GP Land Use Goals and Policies	Consistency Analysis
<p><b>CD-1.2 Infill Development, Priority to Mixed Use:</b> Promote the efficient use of larger vacant parcels and vacant areas of the City by encouraging infill development, with a priority to mixed uses that reduce vehicle trips and GH emissions and promote sustainable development goals and objectives.</p>	<p><b>Consistent.</b> The project Site is an infill site surrounded by existing residential development and is identified in the City of Oxnard 2030 General Plan as a potential school site. It is anticipated that students attending the proposed school will come from the surrounding neighborhood and would be able to utilize a variety of transportation modes including walking, bicycling, bus and/or vehicles on the local roadway network. In addition, a CCA is in place with the City to provide additional recreation opportunities to the community as well as civic center use of other school facilities on Site, outside of school hours.</p>
<p><b>CD-1.4 Transportation Choices:</b> Promote the application of land use and community designs that provide residents with the opportunity for a variety of transportation choices (pedestrian, bicycle, transit, automobile).</p>	<p><b>Consistent.</b> The project Site is an infill site surrounded by existing residential development and is identified in the City of Oxnard 2030 General Plan as a potential school site. It is anticipated that students attending the proposed school will come from the surrounding neighborhood and would be able to utilize a variety of transportation modes including walking, bicycling, bus and/or vehicles on the local roadway network.</p>
<p><b>CD-1.6 Public Facilities:</b> Enhance resident quality of life by providing adequate space for schools, libraries, parks and recreation areas, as well as space for the expansion of public facilities to support the community's vision.</p>	<p><b>Consistent.</b> The OUHSD proposes to construct and operate a new neighborhood high school with CCA facilities to provide needed educational facilities for District students. Facilities proposed for community use under the CCA include practice fields, JV baseball and softball fields, pool, outdoor basketball courts, tennis courts, performing arts center, and parking. Refer to Figure 2-4 for CCA areas.</p>
<p><b>CD-1.7: Compact Development:</b> Promote the use of development patterns that are more compactly built and use space in an efficient manner as part of the community vision.</p>	<p><b>Consistent.</b> The OUHSD proposes to construct and operate a new neighborhood high school with CCA facilities to support up to 2,500 high school students in grades 9-12. The project Site is an infill site surrounded by existing residential development and is identified in the City of Oxnard 2030 General Plan as a potential school site.</p>
<p><b>CD-1.8 Natural Resource Conservation:</b> Promote a high quality of life within the community, incorporating the retention of natural open space areas, greenbelts, and the provision of adequate recreational facilities.</p>	<p><b>Consistent.</b> The OUHSD proposes to construct and operate a new neighborhood high school with CCA facilities to support up to 2,500 high school students in grades 9-12. Facilities proposed for community use under the CCA include practice fields, JV baseball and softball fields, pool, outdoor basketball courts, tennis courts, performing arts center, and parking. Refer to Figure 2-4 for areas. As discussed in EIR Section 3.14 (Recreation), the approximately 20.3 acres of community facilities that will be available to the public through the CCA will likely lessen the physical impacts/demand on nearby park and recreational facilities as opposed to increase the demand. This would help the City in meeting its standard for acreage of parks per 1,000 residents. This would be a beneficial impact.</p>

Applicable GP Land Use Goals and Policies	Consistency Analysis
<b>Goal CD-3:</b> A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.	<b>Consistent.</b> The OUHSD proposes to construct and operate a new neighborhood high school with CCA facilities to support up to 2,500 high school students in grades 9-12.
<b>CD-6.2: Agricultural Preservation:</b> Reserve agricultural land and uses within the Oxnard Planning Area unless other uses are allowed through future CURB amendment and/or applicable exemptions.	<b>Consistent.</b> While the project Site is currently used for agriculture, the 2030 General Plan accounted for urban development of the site. As discussed in EIR Section 3.2 (Agriculture and Forestry Resources), even though the land use is proposed for a change to accommodate the school, the buildout of the Site with a non-agricultural use was previously accounted for in the 2030 General Plan and identified in the East Village Phase III Annexation EIR. While the proposed project would be a different development scenario than previously evaluated it would nonetheless also convert the Site to non-agricultural use. No new or increased impact related to conversion of important farmland would result given the location of the project Site within a developed urban environment.
<b>Goal CD-7:</b> Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.	<b>Consistent.</b> The project Site is an infill site surrounded by existing residential development and is identified in the City of Oxnard 2030 General Plan as a potential school site.
<b>CD-7.12: Urban Village Collocation with Schools:</b> Promote the collocation of parks with school facilities for the purpose of enhancing available open space and recreation.	<b>Consistent.</b> The OUHSD proposes to construct and operate a new neighborhood high school with CCA facilities to support up to 2,500 high school students in grades 9-12.
<b>CD-8.5: Impact Mitigation:</b> Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.	<b>Consistent.</b> This EIR evaluates potential impacts related to construction and operation of the proposed project and includes mitigation measures when warranted and feasible to reduce project impact. Mitigation Measures have been identified for aesthetics, agriculture and forestry resources, air quality, biological resources, cultural and tribal cultural resources, geology and soils, hydrology and water quality, noise, transportation, and utilities and service systems in this EIR.
<b>CD-8.8 Public Facility Service Areas:</b> Provide appropriate service areas for existing and planned public facilities such as a museum, secondary and elementary schools, fire stations, branch libraries, community centers, parks, and infrastructure utility for support facilities.	<b>Consistent.</b> The project Site is identified in General Plan Figure 4-2 as a potential school location. The OUHSD proposes to construct and operate a new neighborhood high school with CCA facilities to support up to 2,500 high school students in grades 9–12.
<b>ICS-21.3 Siting of Schools:</b> Minimize the student crossing of major arterial or collector streets by encouraging school districts to site schools within residential neighborhoods, where appropriate.	<b>Consistent.</b> The project Site is an infill site surrounded by existing residential development and is identified in the City of Oxnard 2030 General Plan as a potential school site. It is anticipated that students attending the proposed school will come from the surrounding neighborhood and would be able to utilize a variety of transportation modes including walking, bicycling, bus and/or vehicles on the local roadway network.



Applicable GP Land Use Goals and Policies	Consistency Analysis
<p><b>ICS-21.8 Potential School Location Exhibit:</b> General Plan Figure 4-2 illustrates possible locations of public schools for the Rio, Oxnard, Ocean View, Hueneme, and Oxnard High School Districts. This exhibit shall be administratively updated annually by the Development Services Director with invited input from the districts. The locations do not commit the districts to developing schools at these sites nor limit their options at other sites not shown on the exhibit. The exhibit serves as a coordination tool between the five districts and the City.</p>	<p><b>Consistent.</b> The project Site is identified in General Plan Figure 4-2 as a potential school location.</p>
<p><b>MC-2.5 CEQA Notification:</b> Continue to provide CEQA notifications to Navy Base Ventura County (NBVC) for review and comment on City discretionary land use actions to include, but not limited to, General/Specific Plan/Coastal Plan amendments, zone changes, tract or parcel, maps, and special use or coastal development permits.</p>	<p><b>Consistent.</b> A copy of the Notice of Availability (NOA) of a Draft EIR will be sent to NBVC to provide notification that the EIR is available for review and comment during the 45-day public review period.</p>
<p><b>MC-3.2 Vertical Obstructions:</b> Ensure all new development within the City is developed in accordance with Federal Aviation Regulations (FAR) Part 77 that is generally concerned with any construction or alteration more than 200 feet above ground level.</p>	<p><b>Consistent.</b> The proposed project does not include buildings or structures more than 200 feet above ground level.</p>
<p><b>MC-3.4 Reference the Navy's Military Influence Area Map:</b> Refer to the Navy's Military Influence Map as it may be updated, to identify possible City actions in or near NBVC installations, operations areas, and/or on or along designated mobilization routes and consult with NBVC for their input.</p>	<p><b>Consistent.</b> The proposed project is not within a Military Influence Area as identified on the General Plan Military Influence Areas Map (City of Oxnard General Plan Figure 7-1). No further consultation required.</p>

As indicated in Section 2.4 of this EIR, to the extent any such use is not in conformance, the District either will work with the City for any necessary General Plan and/or Zoning Amendments or consider State Law for overruling such requirements as to applicable school facilities construction per Government Code Section 53094. Therefore, with compliance with existing regulations, project land use impact would be less than significant.

### 3.11.2.4 Cumulative Impacts

Development of the project in conjunction with the related projects (including any potential future development of the remaining portions of the Maulhardt Property) would result in further “infilling” of various urban land uses in the City. Each related project would be subject to individual review for conformance to current land use regulations and compatibility with surrounding land uses. Additionally, each related project would be subject to independent environmental review. These procedures would provide assurances that potential cumulative impacts related to land use consistency and compatibility would generally be less than significant.

The City certified the 2030 General Plan Program EIR on October 11, 2011 that considered the possible environmental impacts of buildout to 2030: adding approximately 40,000 people to the City's population, development of all remaining vacant land within the Oxnard CURB Line (including the project Site). The project Site was also identified as a potential school location on the City of Oxnard General Plan Figure 4-2. The 2030 General Plan Program EIR finds that Class I significant and unavoidable impacts are: 1) Air Quality (Basin Attainment); 2) Greenhouse Gases Emissions; 3) Agricultural Resources; 4) Circulation, Traffic and Transportation (five intersections operate below Level of Service 'C'); and 5) Noise and Ground Vibration. All other cumulative environmental impacts are found to be less than significant with implementation of mitigating policies and programs. The 2030 General Plan Program EIR is hereby incorporated for the cumulative analysis of land use impacts.

### **3.11.2.5 Mitigation Measures**

No Mitigation Measures are required.

### **3.11.2.6 Level of Impact After Mitigation**

The potential land use impacts associated with the proposed project would be less than significant and no Mitigation Measures would be required.

## 3.12 NOISE

This section provides an analysis of the potential noise impacts associated with the construction and operation of the proposed project. This analysis describes the existing and proposed conditions of noise in the study area, evaluates the relevant components and characteristics, and assesses the impacts that have the potential to occur as a result of the project. As noted in the IS (Appendix A), potential project impacts associated with noise levels within the vicinity of private airstrips or airport land use plans was found to be less than significant and are not discussed in detail in the EIR.

### 3.12.1 Environmental Setting

#### 3.12.1.1 Existing Conditions

The existing noise environment consists of vehicle noise from local street traffic on Camino Del Sol, Rose Ave., Cesar Chavez Dr., nature sounds, and community sounds. The Site is adjacent to agricultural land to the north; single family residential land and Rio Rosales Elementary School to the east; single and multi-family residential and commercial land to the south; and single-family residential land to the west. There are three public parks within 0.5-mile of the Site: Del Sol Park to the southwest, Thompson Park to the south, and West Village Park to the northwest.

The Oxnard Airport is located approximately 2.7 miles west of the project Site. In order to obtain typical ambient noise levels at the project Site, four short term ambient noise measurements of 30 minutes each were taken during the daytime period within the project boundary. The measurements were taken with a Larson Davis 831 sound level meter using a Type 1 microphone. The sound level meter was calibrated before and after each field measurement. The measured ambient noise levels ranged from 52 dBA  $L_{eq}$  to 61 dBA  $L_{eq}$ .

#### 3.12.1.2 Regulatory Setting

##### **Federal**

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

The U.S. EPA (U.S. EPA 1974) has developed and published criteria for environmental noise levels with a directive to protect public health and welfare with an adequate margin of safety. This U.S. EPA criterion (Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety) was developed to be used as an acceptable guideline when no other local, county, or State standard has been established. However, the USEPA criterion is not meant to substitute for agency regulations or standards in cases where States and localities have developed criteria according to their individual needs and situations.

##### ***Federal Transit Administration (FTA)***

The FTA has developed vibration impact thresholds for noise-sensitive buildings, residences, and institutional land uses. These thresholds are 80 vibration velocity level (VdB) at residences and buildings where people normally sleep (e.g., nearby residences and daycare facilities) and 83 VdB at institutional buildings (e.g., schools and churches). These thresholds apply to conditions where there are an infrequent number of events per day. Although established for transportation-related activities, these thresholds are widely used to evaluate the significance

##### **State**

##### ***The State of California***

Office of Noise Control Standards has also developed land use compatibility guidelines for community noise (California Department of Health 1976). Following these guidelines, establishing residences, churches, libraries, hospitals, and schools in areas exceeding 70 decibels (dB) community noise equivalent level (CNEL) is normally unacceptable. These facilities are conditionally acceptable in areas that measure between 60 and 70 dB CNEL.

Professional and commercial office buildings are normally unacceptable in areas exceeding 75 dB CNEL and are conditionally acceptable in areas that measure between 67 dB and 77 dB CNEL. These guidelines, however, can be modified to reflect sensitivities of individual communities to noise.

## Local

### *The City of Oxnard Noise Element*

The City of Oxnard Noise Element to the General Plan identifies the land use compatibility standard for noise-sensitive land uses as a CNEL of 55 dBA to 70 dBA as conditionally acceptable. The Noise Element has identified mutually compatible goals, objectives, and policies that provide a general framework for future efforts to achieve a quiet environment. These goals, objectives and policies listed in the Noise Element are provided below:

- Goals
  - A quiet environment for residents of Oxnard.
- Objectives
  - Provide acceptable noise levels for residential and other noise-sensitive land uses consistent with State guidelines.
  - Protect noise sensitive uses from areas with high ambient noise levels.
  - Integrate noise considerations into the community planning process to prevent noise/land use conflicts.
- Policies
  - The City should encourage land uses that are not noise sensitive in areas that are permanently committed to noise producing land uses, such as transportation corridors.
  - The City should promote maximum efficiency in noise abatement efforts through intergovernmental coordination and public information programs.
  - Educational institutions should be located in areas where students and teachers can perform without distraction from noise.
  - The City shall promote, where feasible, alternative sound attenuation measures other than the traditional wall barrier.
  - Municipal policies shall be consistent with the Ventura County Airport Land Use Commission's adopted land use plan.
  - Proposed development projects shall not generate more noise than that classified as "satisfactory," as determined by noise compatibility standards, on nearby property. Project applicants shall reduce or buffer the noise generated by their projects.
  - The City shall prohibit the development of noise-sensitive land uses within the Oxnard Airport 65 dB(A) CNEL contour.
  - The City shall continue to enforce State Noise Insulation Standards for proposed projects in suspected high noise environments. The Planning Division shall notify prospective developers that, as a condition of permit issuance, they must comply with noise mitigation measures, which designed by an acoustical engineer. No building permits will be issued without City staff approval of the acoustical report/design.
  - The City shall establish noise referral zones along existing or proposed major transportation routes. Proposed development within these zones should be evaluated for noise impacts.

- Preparation of the Ormond Beach Specific Plan shall include acoustical analysis to determine potential impacts from Point Mugu NAS and Air National Guard facility.
- Noise contour maps and tables shall be utilized as a guide to future land use decisions.

### **City of Oxnard Code of Ordinances**

The City of Oxnard's Code of Ordinances Chapter 7 Section 7-185 limits noise propagation to residential land uses from stationary equipment during the daytime period (7:00 a.m. to 10:00 p.m.) to 55 dBA  $L_{eq}$  and during the nighttime period (10:00 p.m. to 7:00 a.m.) to 50 dBA  $L_{eq}$ .

## **3.12.2 Impact Analysis**

### **3.12.2.1 Methodology**

To determine potential noise effects of the proposed project during the construction and daily operations of the facility, a noise model was constructed to evaluate the effects of the proposed project related noise sources on the environment. Modeling of the project Site and surrounding environment was accomplished using Cadna (Computer Aided Noise Abatement), which is a model-based computer program developed for predicting noise impacts in a wide variety of conditions. Cadna allows for the input of project information such as noise source data, barriers, structures, and topography to create a detailed computer-aided drafting (CAD) model, and uses the most up-to-date calculation standards to predict outdoor noise impacts to property lines and adjacent surrounding areas.

### **3.12.2.2 Significance Thresholds**

The thresholds for noise resource impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies?*
- *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

### **3.12.2.3 Project Impacts**

***Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies?***

The City of Oxnard General Plan Noise Element identifies land use compatibility standard for noise-sensitive land uses as a CNEL of 55 dBA to 70 dBA as conditionally acceptable. Ambient levels of 52 dBA to 61 dBA were observed at the project Site during field monitoring. The dominant noise sources in the vicinity of the proposed project Site is traffic noise associated with Camino Del Sol and Rose Ave. Based on existing traffic volumes, noise impacts to adjacent residences range from 54 dBA CNEL to 68 dBA CNEL. The project would result in an increase in traffic along Camino Del Sol and Rose Ave during the arrival and departure of students. The project traffic analysis identifies an increase of 1,827 Average Daily Trips (ADT) at Rose Ave, and 3,016 ADT at Camino Del Sol. This increase in ADT represents an increase of less than 1 dBA at the residences adjacent to the proposed project. According to the CEQA guidelines, an increase in the overall ambient community noise level of less than 1 dBA is considered to be a less than significant impact. The construction of the proposed school Site would have only a minimal impact on daily traffic volumes in the project vicinity, and thus would have minimal impact on traffic noise conditions.

Construction of the proposed high school is planned to start in early 2020. All project construction activities are anticipated to be completed within 25 months. The project construction activities are anticipated to occur in phases



and include grading, building construction, paving, building interiors, and off-Site street work. These construction activities would require a variety of equipment. Typical construction equipment would not be expected to generate noise levels above 90 dBA at 50 feet, and most equipment types would typically generate noise levels of less than 85 dBA at 50 feet.

The highest noise levels during construction are normally generated during Site grading and foundation work. Grading equipment would be the loudest equipment used at the Site. This equipment is expected to generate a maximum instantaneous noise level ( $L_{max}$ ) of up to 75 - 80 dBA at the homes located at a distance of 100 feet to the south of the project. This would be loud enough to temporarily interfere with speech communication outdoors and indoors with the windows open.

Worst-case construction levels would generate a maximum instantaneous noise level ( $L_{max}$ ) of 65 dBA at the Rio Rosales Elementary School. This is not loud enough to interfere with speech communication outdoors or indoors. Project construction would occur between the hours of 7:00 a.m. and 3:30 p.m., Monday through Friday. Project construction will also implement standard noise reduction measures. Due to the infrequent nature of loud construction activities at the Site, the limited hours of construction, and the implementation mitigation measure N-1, the temporary increase in noise due to construction is considered to be a less than significant impact.

The project Site is located within the Oxnard Airport SOI. The airport runway midfield point is located approximately 2.7 miles west of the project Site. Oxnard Airport is an active general aviation/small scheduled service airport with approximately 169 based aircraft and approximately 74,157 operations for calendar year 2016 (VCTC 2017). The Oxnard Airport Noise Contour map within the City of Oxnard Noise Element to the General Plan shows that the project Site is located just outside of the 60 dBA CNEL contour. Therefore, the noise impact levels from the Oxnard Airport to the project Site will be below 60 dBA CNEL and with typical educational facility construction with windows closed, interior noise levels from aircraft operations are expected to achieve 45 dBA CNEL or less, which achieves both the State and City interior noise requirements. Therefore, noise impacts from the Oxnard Airport are considered to be less than significant.

The City of Oxnard's Code of Ordinances Chapter 7 Section 7-185 limits noise propagation to residential land uses from stationary equipment during the daytime period (7:00 a.m. to 10:00 p.m.) to 55 dBA  $L_{eq}$  and during the nighttime period (10:00 p.m. to 7:00 a.m.) to 50 dBA  $L_{eq}$ . The project consists of the construction and operation of a new high school comprising approximately 211,115 square feet of buildings and structures. This proposed facility will include twenty-three new buildings, which include an approximate total of 155 rooftop HVAC units. The classrooms would be designed and constructed to have a Community Noise Equivalent Level of 45 dB or less.

This proposed facility will include twenty-three new buildings, which include an approximate total of 155 rooftop HVAC units. Given the elevated rooftop height for the mechanical equipment and assuming the rooftop mechanical equipment operates simultaneously, the noise levels from the operation of all the rooftop mechanical equipment would range from 45 dBA  $L_{eq}$  at the residential homes located to the south Camino Del Sol, 50 dBA  $L_{eq}$  at the residential homes located directly east of the project, 40 dBA  $L_{eq}$  at Rio Rosales Elementary School, 39 dBA  $L_{eq}$  at the residential homes across Rose Ave to the west, and 37 dBA  $L_{eq}$  at the residential homes across Cesar Chavez Drive to the north. The noise impacts from the rooftop mechanical equipment are less than the measured current ambient noise levels at the project Site and will result in a 2 dBA or less increase to the existing ambient noise levels. The noise levels generated by the proposed project will comply with the City of Oxnard's General Plan and Code of Ordinances. Therefore, project impact is less than significant.

***Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

Operation of the school would not generate vibration; however, construction of the classroom buildings and Site grading as well as infrastructure improvements and utility connections would require the use of equipment that could generate vibration. Possible sources of vibration may include bulldozers, dump trucks, backhoes, rollers, and other construction equipment that produces vibration. No blasting will be required at the project Site.

Project construction activities would occur within approximately 50 feet from the nearest single-family residence. According to FTA guidelines, a vibration level of 78 VdB is the threshold of perceptibility for humans. For a significant impact to occur, vibration levels must exceed 80 VdB during infrequent events (Federal Transit Administration 2006). Based on the levels published by the FTA (Federal Transit Administration 2006) and the type of equipment proposed for use at the proposed project, coupled with the distance to the existing identified noise sensitive receptors, analysis shows that the vibration levels maybe perceptible at the nearest sensitive receptors, but will be below the maximum vibration level of 80 VdB. This vibration level is considered acceptable for impacts to sensitive receptors. Therefore, project impact is less than significant impact.

### 3.12.2.4 Cumulative Impacts

Cumulative projects include the effects of existing, current and reasonability foreseeable future projects. As noted above, the proposed project is shown to not significantly increase the overall ambient community noise level and would not expose persons to or generate excessive groundborne vibration or groundborne noise. Therefore, project cumulative impact would be less than significant.

### 3.12.2.5 Mitigation Measures

**N-1:** Construction noise levels fluctuate depending on the construction phase, equipment types and duration of use; distance between noise source and sensitive receptor; and the presence or absence of barriers between noise source and receptors. Therefore, the project proponent should require construction contractors to limit standard construction activities as follows:

- Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible. In addition, the time allowed for equipment and trucks to idle will be limited to the extent practicable.
- Stationary noise sources shall be located as far from adjacent receptors as possible and shall be muffled and enclosed within temporary sheds, incorporate insulation barriers or other measures to the extent feasible.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. However, where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible. This could achieve a reduction of 5 dBA. Quieter procedures shall be used such as drilling rather than impact equipment whenever feasible.
- Heavy construction equipment operations should be limited during the school period when classrooms are being utilized in the adjacent building.
- When heavy construction activities are located within 75 feet of a residential structure deploy a temporary portable sound barrier between the construction activities and nearest sensitive receptor.

### 3.12.2.6 Level of Impact After Mitigation

With the implementation of Mitigation Measure N-1, project impact would be less than significant.

### 3.13 PUBLIC SERVICES

This section describes the proposed project's potential to affect public services including fire protection, police protection, and parks. As noted in the Initial Study (Appendix A), impacts associated with schools and other public facilities were found to have a less than significant impact and are not discussed in detail in the EIR.

#### 3.13.1 Environmental Setting

##### 3.13.1.1 Existing Conditions

###### Fire Protection

The Oxnard Fire Department provides a full range of emergency and non-emergency services to the Oxnard community including fire suppression, emergency medical service, urban search and rescue, hazardous material response, vehicle and industrial accident response, ocean and surf rescue, fire investigation, public fire and life safety education, records management, regulation of hazardous material uses, community disaster response training, disaster preparedness, and review and inspection of new construction. The mission of the Oxnard Fire Department is to serve the public and safeguard the community by preventing or minimizing the impact of emergency situations to life, the environment, and property by responding to both emergency and non-emergency calls for service. There are eight Fire Stations in the City of Oxnard and the nearest Fire Station to the project Site is Station 5 (City of Oxnard 2019c). Based on an interview with Chief Darwin Base, Station 5 would provide emergency and non-emergency services to the project Site (Oxnard Fire Department 2019). The service area for Station 5 covers a population of 3153 residents; in 2018, Station 5 responded to 5,398 calls for service. The Oxnard Fire Department as a whole had 18,800 individual unit responses in the year 2018. The location of Fire Stations within the City and the approximate distance of the stations to the project Site are identified in Table 3-14.

**Table 3-14.** Fire Station Locations

Station Number	Address	Approximate Driving Distance to Project Site
1	491 South "K" Street Oxnard, CA 93030	2.4 miles
2	531 East Pleasant Valley Road Oxnard, CA 93030	4.2 miles
3	150 Hill Street Oxnard, CA 93030	2.4 miles
4	230 West Vineyard Avenue Oxnard, CA 93030	2.7 miles
5	1450 Colonia Road Oxnard, CA 93030	0.3 miles
6	2601 Peninsula Road Oxnard, CA 93030	5.9 miles
7	3300 Turnout Park Circle Oxnard, CA 93036	3.1 miles
8	3000 South Rose Avenue Oxnard, CA 93033	2.3 miles

Source: Distances estimated utilizing Google Earth Pro 2018 from the Station-site to the corner of Camino Del Sol and North Rose Avenue

## Police Protection

The Oxnard Police Department provides police protection services to the City of Oxnard. The Oxnard Police Department is located at 251 South “C” Street, Oxnard, CA 93030 and employs approximately 238 sworn officers and 151 civilian staff under the leadership of Chief of Police Scott Whitney (Oxnard Police Department 2019).

The Department promotes a community-based policing philosophy and has embraced prevention and intervention strategies in policing the City. There are five police officers that work hand-in-hand with the City’s schools offering assistance to teachers and students alike providing a positive police presence on campus. The Department has the county’s first Police Activities League program, a highly successful effort aimed at preteen youth in Oxnard who are in need of positive interaction with an adult role model. Other community programs started by the Department include two police storefronts and several drop-in centers. Department personnel and a host of volunteers staff these storefronts and drop-in centers. Police services are provided to residents in their own areas through the storefronts rather than requiring the residents coming to the police station (OPD 2019).

The Department takes pride in the methods used to communicate with its residents. A weekly crime prevention television program titled *StreetBeat* keeps residents informed about crime in the City and offers crime prevention measures that can be used by all Oxnard residents. This television program has been replicated by more than 50 other police departments across the nation in recent years. A telemarketing computer was utilized to notify residents about crime patterns in their respective neighborhoods and the Department has established its own home page on the World Wide Web (OPD 2019).

As the City’s population grows, police service calls would be expected to increase. However, as shown in Table 3-15, over the past four years, the total calls for service within the City of Oxnard have decreased. During 2018, police officers responded to 93,426 calls for service. Oxnard Police Department maintained a response time to priority services calls that averaged at 0:06:36 minutes. This call category includes those calls that pose the greatest threat to life and safety, such as injury, traffic collisions, aggravated assaults, and in-progress crimes. Recorded response times by the Oxnard Police Department by priority for 2015-2018 are provided in Table 3-15 (Garibay 2019).

**Table 3-15.** Oxnard Police Department Response Times for 2015-2018

	2015		2016		2017		2018	
Priority Number	Call Count	Response Time (Minutes)	Call Count	Response Time (Minutes)	Call Count	Response Time (Minutes)	Call Count	Response Time (Minutes)
P1+	368	0:06:37	251	0:06:25	265	0:05:34	218	0:06:36
P1	41,176	0:08:39	33,806	0:17:41	31,163	0:14:22	30,958	0:09:45
P2	34,798	0:35:33	34,414	0:44:39	32,730	0:32:13	33,203	0:28:50
P3	33,063	1:12:53	32,043	1:05:19	30,857	0:49:02	28,745	0:51:20
P4	752	N/A	7,797	N/A	382	N/A	302	N/A
<b>Total</b>	<b>110,154</b>		<b>108,311</b>		<b>95,397</b>		<b>93,426</b>	

## Parks

The City of Oxnard Parks Division maintains the City’s 53 parks that cover over 370 acres. The Parks Department focuses on park improvements, growth, and enrichment to foster the bonds of neighborhoods, create a destination for adult and youth recreation, and beautify the community environment (City of Oxnard 2019d). The City of Oxnard

is in the process of creating a Parks and Recreation Master Plan; this master plan is expected to be completed by June 2019 (City of Oxnard 2019e). There are three public parks within 0.5-mile of the project Site: Del Sol Park to the southwest, Thompson Park to the south, and West Village Park to the northwest (Google Maps 2019).

### 3.13.1.2 Regulatory Setting

#### Federal

There are no applicable federal regulations for public services.

#### State

There are no applicable state regulations for public services.

#### Local

The City of Oxnard 2030 General Plan Goals and Policies for infrastructure and community services (ICS) for fire protection, police protection, and park services most relevant to the proposed project are provided herein.

<b>Goal ICS-1</b>	Provision of adequate facilities and services that maintain service levels with adequate funding.
<b>ICS-1.1</b>	Maintain Existing Service Levels
<b>ICS-1.3</b>	Funding for Public Facilities
<b>ICS-1.4</b>	Infrastructure Conditions of Approval
<b>Goal ICS-19</b>	Adequate and effective law enforcement and the incorporation of crime prevention features in developments.
<b>ICS-19.2</b>	<b>Police Review of Development Projects:</b> Continue to require the Police Department to review proposed development projects and provide recommendations that enhance public safety.
<b>ICS-19.4</b>	<b>Crime Prevention Device Requirements:</b> Require crime prevention devices (e.g., deadbolt locks, peepholes, etc.) in all new development.
<b>ICS-19.5</b>	<b>Incorporating Security Design Principles:</b> Encourage crime prevention and defensible space through design principles such as those employed through the National Crime Prevention through Environmental Design program, Neighborhood Watch Program, and/or other appropriate methods to enhance public safety.
<b>ICS-19.7</b>	<b>New Development:</b> Require new development to fund a fair share extension of police services to maintain service standards, including personnel and capital improvement costs.
<b>ICS-19.8</b>	<b>Response Time:</b> Achieve and maintain an average response time of five (5) minutes or less for priority one calls.
<b>Goal ICS-20</b>	Protected public through effective fire prevention services and the incorporation of fire safety features in new development.
<b>ICS-20.1</b>	<b>Fire Response Time:</b> Achieve and maintain a response time of five minutes 90% of the time as a goal for service call response and siting of new fire stations.
<b>ICS-20.5</b>	<b>Fire Services to New Development:</b> require new development to fund a fair share extension of fire services to maintain service standards, including personnel and capital improvement costs.
<b>ICS-20.7</b>	<b>Adherence to City Standards:</b> Ensure that water main size, water flow, fire hydrant spacing, and other fire facilities meet City standards.



- ICS-20.8 Development Review:** review new development applications to assess potential impacts to existing fire protection services and the need for additional and expanded services.
- ICS-20.10 Adequate Emergency Access and Routes:** Require that new development provide adequate access for emergency vehicles, particularly firefighting equipment, and evacuation routes, as appropriate.
- Goal ICS-23** A full range of recreational facilities and services accessible to all Oxnard residents, workers, and visitors.
- ICS-23.1 City Park and Recreation Standards:** Provide park and recreation facilities at a level that meets the standards for neighborhood and community parks as shown in Table 3-16.

**Table 3-16.** City Park and Recreation Standards

Type of Park	Net Acres/1,000 Residents	Min. Net Acres/Park	Service Radius
Mini/Pocket	No standard	No standard	1/3 mile
Neighborhood	1.5	5	1/2-1 mile
Community	1.5	20	1-1/2 miles
Total	3.0	N/A	N/A

- ICS-23.4 Collocation of Parks and Schools:** Future neighborhood park sites shall be located next to school sites whenever feasible.

## 3.13.2 Impact Analysis

### 3.13.2.1 Methodology

The City of Oxnard CEQA guidelines for public services that include fire protection, law enforcement, and recreation/parks provides for the use appropriate service generation factors or input from service providers to determine the anticipated demand of the project for these public services. For an analysis of project impact, a determination must be made of whether the increase in demand is within the capabilities of existing facilities or whether new or expanded facilities would be needed. Any needed new personnel would constitute a potentially significant environmental impact only if the need for new personnel may necessitate the construction of new facilities or expansion of existing facilities, the construction of which may have significant environmental effects.

### 3.13.2.2 Significance Thresholds

The thresholds for public service impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:*
  - a. *Fire Protection?*
  - b. *Police Protection?*
  - c. *Parks?*

### 3.13.2.3 Project Impacts

***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:***

***i.) Fire Protection?***

The project Site is located within the City of Oxnard and fire protection services would be provided by the Oxnard Fire Department. The proposed project would be designed and constructed to meet required fire standards that would include adequate emergency vehicle access. Construction would comply with OSHA and Fire and Building Codes. The Oxnard Fire Department has been consulted regarding Site design, access, and fire hydrants.

Operation of the school facility is anticipated to generate a typical range of service calls including fire suppression, emergency medical, and emergency rescue requests for service. Fire Station 5 located at 1450 Colonia Road is within 0.3 mile of the project Site. This station is close enough to provide fire protection services within a reasonable response time in accordance with local goals and policies. Chief Darwin Base of the Oxnard Fire Department has provided an estimate that the response time from Fire Station 5 to the corner of Camino Del Sol and North Rose Avenue would be less than 5 minutes (Oxnard Fire Department 2019). Therefore, with compliance with existing regulations, project impact on fire protection services would be less than significant.

***ii.) Police Protection?***

The District and its program manager shall direct the contractor to properly fence the Site during construction of the school facilities. The fence will help to reduce the potential for materials and equipment to be targets of theft that could result in a need for increased police services during construction.

During operation, the school facilities would be within the service boundary of the Oxnard Police Department. The school facilities are proposed to accommodate both existing and anticipated future enrollment. Public funds, such as property taxes, would be used to cover the incremental costs associated with providing police services for future enrollment at the facilities. The project would not require the expansion of existing police facilities or the construction of new facilities. As a result, the proposed project would result in a less than significant impact related to police protection during construction and long-term operation.

***iii.) Parks?***

Demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. No housing is proposed as a part of the project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all of the additional staff could be hired from the existing qualified applicant pool already residing within or near the District. However, if teachers or other staff are hired outside the District area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the local population. The proposed project is needed to accommodate existing and anticipated future enrollment in OUHSD, and includes educational facilities designed to meet the educational and recreational needs of grades 9-12 students onsite. Recreational facilities to be provided on campus include a stadium, a variety of play fields, hard courts, and a pool. In addition, the Civic Center Act would allow approximately 20.3 acres of school sports facilities, recreational areas, and parking for scheduled community use; see Figure 2-4 for Civic Center Act Areas. The community facilities that will be available to the public through the Civic Center Act will likely lessen the physical impacts/demand on nearby park and recreational facilities as opposed to increase the demand. New park facilities will not be needed; therefore, project impact would be less than significant.

### **3.13.2.4 Cumulative Impacts**

#### **Fire and Police Protection**

The proposed project would cause an incremental increase in demand for fire and police protection services. Consistent with General Plan Policy ICS-1.3, as development in the City occurs, growth development fees would be required for allocation by the City of Oxnard ensure adequate levels of service (City of Oxnard 2011a).

#### **Parks**

The proposed project is a comprehensive high school that would provide adequate recreational facilities on Site to meet students' educational needs. Increased demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. City of Oxnard Municipal Code Chapter 13 Article IV includes a park acquisition and development tax for each new dwelling unit. The revenue collected from this tax goes into the park acquisition and development fund. No housing is proposed as a part of the project, and a minimal increase in the local population is expected. Additionally, recreational facilities proposed for community use through the CCA would have a positive cumulative effect on park facilities. Therefore, project contribution to cumulative impacts would be less than significant.

### **3.13.2.5 Mitigation Measures**

No Mitigation Measures are required.

### **3.13.2.6 Level of Impact After Mitigation**

No Mitigation Measures are required; project impact would be less than significant.

## 3.14 RECREATION

This section describes the proposed project's potential to affect the demand for park and recreational facilities in the local area. As noted in the Initial Study (Appendix A), potential project impacts associated with increasing the use of existing neighborhood and regional parks or other recreational facilities were found to be less than significant and are not discussed further in the EIR.

### 3.14.1 Environmental Setting

#### 3.14.1.1 Existing Conditions

The City of Oxnard Parks Division manages and maintains all municipally owned and operated recreation and park facilities within the City. The City's 53 parks cover over 370 acres. In addition, there are 129 acres of open space in the City (City of Oxnard 2019d). The Parks Department focuses on park improvements, growth, and enrichment to foster the bonds of neighborhoods, create a destination for adult and youth recreation, and beautify the community environment (City of Oxnard 2019d). The City of Oxnard is in the process of creating a Parks and Recreation Master Plan; this master plan is expected to be completed by June 2019 (City of Oxnard 2019e). There are three public parks within 0.5-mile of the project Site: Del Sol Park to the southwest, Thompson Park to the south, and West Village Park to the northwest (Google Maps 2019). Thompson Park and West Village Park are neighborhood parks and Del Sol Park is a community park.

With a 2018 population estimated at nearly 210,000, the City has a ratio of 1.76 acres of parks per 1,000 residents (excluding open space), which is short of the City standard of 3.0 acres of parks per 1,000 residents.

#### 3.14.1.2 Regulatory Setting

##### Federal

No federal policies or regulations pertaining to recreation are applicable to the proposed project.

##### State

No state policies or regulations pertaining to recreation are applicable to the proposed project.

##### Local

The City of Oxnard 2030 General Plan Goals and Policies for recreation services most relevant to the proposed project are as follows:

**Goal ICS-23** A full range of recreational facilities and services accessible to all Oxnard residents, workers, and visitors.

**ICS-23.1 City Park and Recreation Standards:** Provide park and recreation facilities at a level that meets the standards for neighborhood and community parks as shown in Table 3-17.

**Table 3-17.** City Park and Recreation Standards

Type of Park	Net Acres/1,000 Residents	Min. Net Acres/Park	Service Radius
Mini/Pocket	No standard	No standard	0.3 mile
Neighborhood	1.5	5	0.5-1.0 miles
Community	1.5	20	1.5 miles
Total	3.0	N/A	N/A

**ICS-23.4 Collocation of Parks and Schools:** Future neighborhood park sites shall be located next to school sites whenever feasible.

### 3.14.2 Impact Analysis

#### 3.14.2.1 Methodology

As discussed in the previous section, the 2030 Oxnard General Plan provides established service ratio goals for park and recreation facilities. For an analysis of project impact, a determination must be made of whether the increase in demand is within the capabilities of existing facilities or whether new or expanded facilities would be needed. Any needed new personnel would constitute a potentially significant environmental impact only if the need for new personnel may necessitate the construction of new facilities or expansion of existing facilities, the construction of which may have significant environmental effects.

#### 3.14.2.2 Significance Thresholds

The thresholds for recreation impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?*

#### 3.14.2.3 Project Impacts

***Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?***

Demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. No housing is proposed as a part of the project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all of the additional staff could be hired from the existing qualified applicant pool already residing within or near the District. However, if teachers or other staff are hired outside the District area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the local population.

The proposed project is needed to accommodate existing and anticipated future enrollment in OUHSD, and includes educational facilities designed to meet the educational and recreational needs of grades 9-12 students onsite. Recreational facilities to be provided on campus include a pool, football/track and field stadium, baseball/softball fields, soccer fields, tennis courts and basketball courts.

In addition, every public school facility is considered a civic center where citizens, school-community councils, and clubs as well as senior, recreation, education, political, artistic, and other organizations may meet. The school district may grant the use of school facilities and grounds upon certain terms and conditions deemed proper by the governing board and subject to specified limitations, requirements, and restrictions set forth within the law (California Department of Education 2019). To meet this objective, a CCA is in place with the City to provide additional recreation opportunities to the community as well as civic center use of other school facilities on Site, outside of school hours. Facilities proposed for community use under the CCA include practice fields, JV baseball and softball fields, pool, outdoor basketball courts, tennis courts, performing arts center, and parking. Please refer to Figure 2-4 for Civic Center Act areas.

The approximately 20.3 acres of community facilities that will be available to the public through the CCA will likely lessen the physical impacts/demand on nearby park and recreational facilities as opposed to increase the demand. This would help the City in meeting its standard for acreage of parks per 1,000 residents. This would be a beneficial



impact. New park facilities will not be needed; therefore, project impacts would be less than significant, and no mitigation would be required.

#### **3.14.2.4 Cumulative Impacts**

The project Site is within the City of Oxnard; therefore, the City is the area of influence for cumulative analysis of park and recreational facilities. No housing is proposed as a part of the project, and a minimal increase in the local population is expected. As such, the proposed project would not conflict with General Plan Policy ICS-23.1. Additionally, the recreational facilities proposed for public use through the CCA would have a positive cumulative effect on park and recreational facilities in the City.

#### **3.14.2.5 Mitigation Measures**

No Mitigation Measures are required.

#### **3.14.2.6 Level of Impact After Mitigation**

No Mitigation Measures are required as project impact would not be significant.

## 3.15 TRANSPORTATION

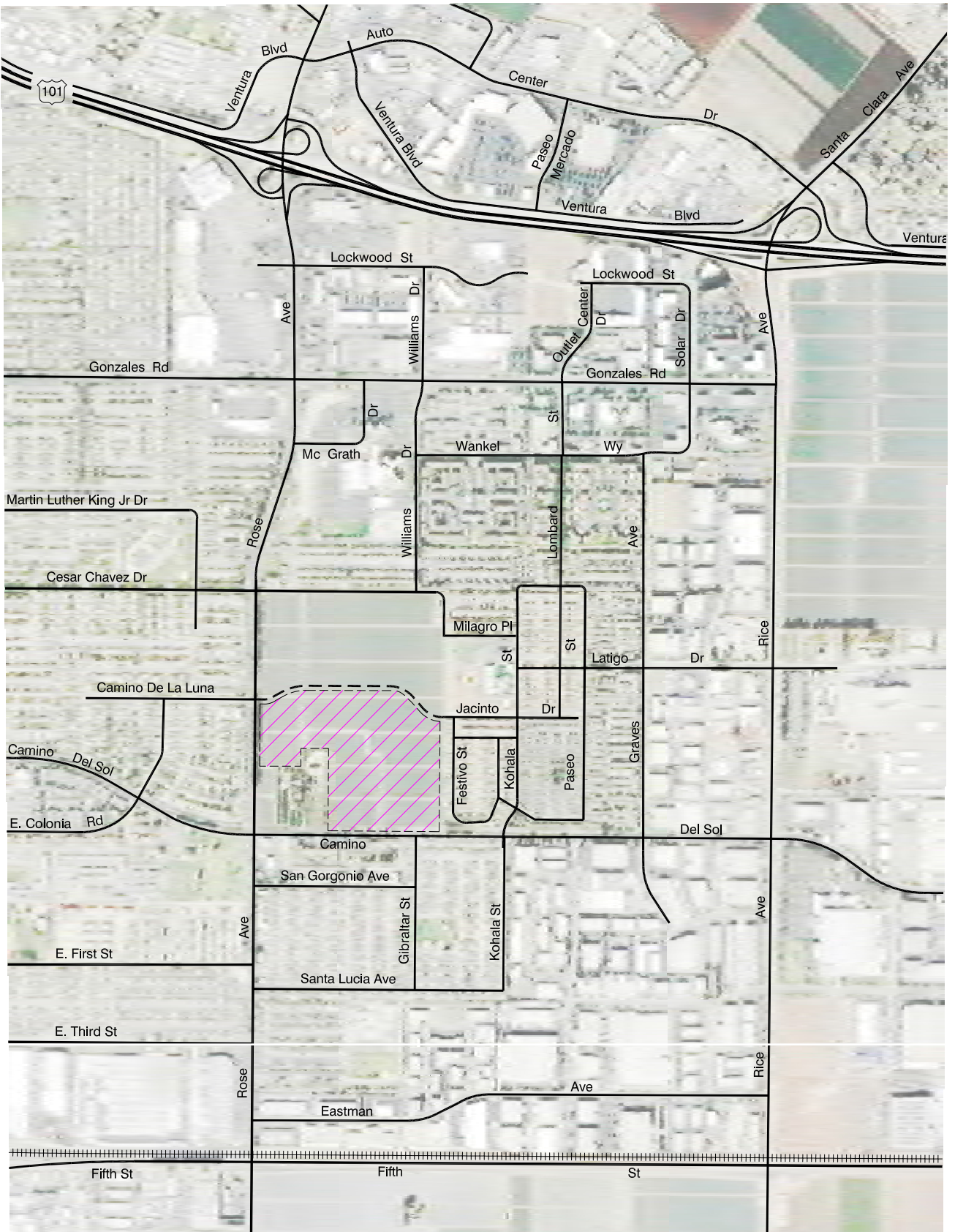
This section provides a discussion of existing transportation conditions and an analysis of potential impacts on traffic conditions from implementation of the proposed project. This section is based on information provided in the Traffic and Circulation Study (TCS) for the OUHSD High School No. 8 prepared by Stantec (Stantec 2019). The TCS is included in Appendix K of this EIR.

### 3.15.1 Environmental Setting

#### 3.15.1.1 Existing Conditions

The project Site includes approximately 49.75 acres of the Maulhardt Property, a 107.25-acre property (APN 214-002-059) located in the City of Oxnard, California. Access to the project Site is provided via three new driveways on the north side of Camino Del Sol and three driveways on the south side of the new segment of Jacinto Drive. The driveway connection to the Camino Del Sol/Gibraltar Street intersection will be full access. The remaining two driveways on Camino Del Sol, located west and east of Gibraltar Road, will be restricted to right-turns only. The three driveways on Jacinto Drive will be full access. Study area roadways that would be utilized by the proposed project include Rose Avenue, Rice Avenue, Camino Del Sol, Gonzales Road, and Fifth Street. The location of these roadways is identified on Figure 3-8 and a description of these roadways is provided below.

- **U.S. Highway 101 (U.S. 101)** extends along the Pacific Coast between Los Angeles and San Francisco. Within the City of Oxnard, the six to eight-lane freeway is the principal route between Oxnard and the cities of Ventura and Santa Barbara to the north, and the cities of Camarillo, Thousand Oaks and Los Angeles to the south. Regional access from U.S. 101 to the project Site is provided via the interchanges with Rose Avenue and Rice Avenue.
- **Rose Avenue** is a north-south primary arterial that extends from Pleasant Valley Road to Los Angeles Avenue located north of Oxnard. The roadway generally contains six travel lanes with a raised median and signals at all full access intersections. The segment between Camino Del Sol and Cesar Chavez Drive contains four travel lanes and a painted median and will be widened as part of redevelopment of the Maulhardt Property. It provides regional access to the project Site via its intersections with Camino De La Luna and Camino Del Sol.
- **Rice Avenue** is a north-south arterial that provides regional access to the project Site from the east. In addition, it serves the Nyeland Acres Community, the Northeast Industrial Area and the southeast residential areas. The segment between the U.S. 101 interchange and the Oxnard Boulevard interchange has been include in the Highway System (SR 1), however signals are operated by the City. South of Gonzales Road, the roadway contains three southbound, a raised median and two northbound lanes. The roadway will be widened as part of redevelopment of the Sakioka Farms Specific Plan. All major intersections are signalized.
- **Camino Del Sol** is an east-west secondary arterial that extends from Victoria Boulevard to Del Norte Boulevard. The posted speed limit on Camino Del Sol is 40 miles per hour through most of its stretch and on-street parking is permitted in certain areas. Camino Del Sol contains four lanes with a divided median from North Garfield Avenue to Rose Avenue, and from Gibraltar Street to Rice Avenue. The segment between Rose Avenue to Gibraltar Street contains four lanes and a painted median. This segment will be widened as part of project frontage improvements.
- **Gonzales Road** is a main east-west primary arterial that serves the central and north-central portions of the City of Oxnard. This roadway extends from Harbor Boulevard to Rice Avenue and contains six lanes and a raised median in the study area.



N.T.S.

LEGEND

 - Project Site

EXISTING STREET NETWORK  
PROPOSED HIGH SCHOOL NO. 8  
OXNARD, CALIFORNIA

 **TETRA TECH** 5383 Hollister Avenue  
Suite 130  
Santa Barbara, CA 93111

JOB NO.	DATE	DRAWN BY	MAP NO.	FIGURE
38846	7/31/2019	BURSON		<b>3-8</b>

MAP SOURCE: OUHSD HIGH SCHOOL NO. 8 TRAFFIC AND CIRCULATION STUDY, STANTEC, JULY 2019.

- **Fifth Street** is the principal east-west street serving the Central Business District of the City and the mid-city region on both the east and west sides of Oxnard. It is currently designated State Route 34 east of Oxnard Boulevard. Fifth Street functions as a secondary arterial except for the segments from Victoria Avenue to H Street and Oxnard Boulevard to Rose Avenue, which function as primary arterials.

### Alternative Transportation

**Public Transit.** The City of Oxnard is served by rail service and fixed route buses including Gold Coast Transit (GCT) and VISTA, or general public Dial a Ride (DAR) services. The major transit centers include the Oxnard Transit Center (OTC) that provides transfers between GCT, Metrolink, Amtrak, and VISTA along with the C Street Transfer Center at the CenterPoint Mall in Oxnard.

Metrolink Ventura County Line provides rail service to Camarillo and Simi Valley into the City of Los Angeles to the Los Angeles Union Station with approximately 45-minute headways during commute periods.

GCT Routes 4 and 17 provide service to the project area with stops along Rose Avenue. Route 2 provides local service from the OTC via Colonia Road to Gibraltar Street and return via First Street. Transfers to Routes 15, 19, 20 and 22 are provided at the St. John's Regional Medical Center located at Rose Avenue and Gonzales Road.

VISTA routes provide regional transit connection with service from Oxnard to Ventura, Santa Barbara and UCSB to the north, and service along SR 34, SR 126 and U.S. 101 to all cities in Ventura County, and the San Fernando Valley.

**Bicycle Network.** Class II bicycle lanes are provided on Rose Avenue north of Camino Del Sol and, Camino Del Sol from Garfield Avenue to Del Norte Boulevard, and on Gonzales Road from Victoria Avenue to Rice Avenue. The City's *Bicycle & Pedestrian Master Plan* (City of Oxnard 2011b) proposed bicycle facilities includes new Class II bicycle lanes on Rose Avenue south of Camino De Sol and a bicycle boulevard on Cesar Chavez Drive from Juanita Avenue to Rice Avenue.

A total of 21 intersections were selected for analysis in consultation with City of Oxnard Traffic Engineering and Planning staff. Existing intersection turning volumes for the AM and PM peak commute periods (7 a.m. to 9 a.m. and 4 p.m. to 6 p.m.) were derived from counts collected in November 2018 and January 2019. Intersection turning counts are included in the Technical Appendix for the TCS (Exhibit 3). The existing lane geometry and control for the intersections within the study area are shown in the TCS (Stantec 2019) and the AM and PM peak hour volumes are illustrated in the TCS (Exhibit 4).

Levels of service (LOS) were calculated for the study-area intersections based on the LOS methodology outlined in the TCS. The technical calculation worksheets are included in the Technical Appendix for the TCS (Stantec 2019) and the existing intersection levels of service are summarized in Table 3-18. As shown, most intersections currently operate at LOS C or better during both peak hours, which is considered acceptable based on City and Caltrans standards. The Rose Avenue/Camino De La Luna intersection, which is unsignalized, operates below the City's LOS C standard.

**Table 3-18.** Existing Intersection Peak Hour Levels of Service

Intersection	Control	AM Peak Hour		PM Peak Hour	
		ICU V/C Ratio	HCM Delay	ICU V/C Ratio	HCM Delay
1. Rose Ave/U.S. 101 NB Ramps (CT)	Signal	-	8.7/LOS A	-	9.6/LOS A
2. Rose Ave/U.S. 101 SB Ramps (CT)	Signal	-	12.1/LOS B	-	15.8/LOS B
3. Rose Ave/Lockwood St	Signal	0.68/LOS B	-	0.65/LOS B	-
4. Rose Ave/Gonzales Rd	Signal	0.65/LOS B	-	0.71/LOS C	-
5. Rose Ave/Cesar Chavez Drive	Signal	0.72/LOS C	-	0.72/LOS C	-

Intersection	Control	AM Peak Hour		PM Peak Hour	
		ICU V/C Ratio	HCM Delay	ICU V/C Ratio	HCM Delay
6. Rose Ave/Camino De La Luna	TWSC	-	<b>26.8/LOS D</b>	-	<b>25.3/LOS D</b>
7. Rose Ave/Camino Del Sol	Signal	0.69/LOS B	-	0.73/LOS C	-
8. Rose Ave/San Gorgonio Ave	Signal	0.56/LOS A	-	0.57/LOS A	-
9. Rose Ave/First St	Signal	0.49/LOS A	-	0.51/LOS A	-
10. Rose Ave/Santa Lucia Ave	Signal	0.54/LOS A	-	0.60/LOS A	-
11. Rose Ave/Third St	Signal	0.49/LOS A	-	0.57/LOS A	-
12. Rose Ave/Eastman Ave	Signal	0.44/LOS A	-	0.57/LOS A	-
13. Rose Ave/Fifth St	Signal	0.63/LOS B	-	0.71/LOS C	-
14. Camino Del Sol/Juanita Ave	AWSC	-	15.5/LOS C	-	9.9/LOS A
15. Camino Del Sol/Colonia Rd	AWSC	-	16.9/LOS C	-	11.4/LOS B
16. Camino Del Sol/Gibraltar St	TWSC	-	12.5/LOS B	-	17.2/LOS C
17. Camino Del Sol/Kohala St	Signal	0.47/LOS A	-	0.54/LOS A	-
18. Rice Ave/U.S. 101 NB Ramps (CT)	Signal	-	16.7/LOS B	-	20.9/LOS C
19. Rice Ave/U.S. 101 SB Ramps (CT)	Signal	-	7.6/LOS A	-	9.6/LOS A
20. Rice Ave/Gonzales Rd	Signal	0.72/LOS C	-	0.60/LOS A	-
21. Rice Ave/Camino Del Sol	Signal	0.49/LOS A	-	0.59/LOS A	-

TWSC: two-way stop control. AWSC: all-way stop control.

All intersections controlled by City of Oxnard except:

(CT): Caltrans controlled intersection.

Caltrans intersections and unsignalized intersections analyzed using the HCM methodology. LOS determined by vehicle delay in seconds.

### 3.15.1.2 Regulatory Setting

#### Federal

There are no relevant federal transportation and circulation regulations applicable to the proposed project.

#### State

#### **2016-2040 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS).**

SCAG is the designated Metropolitan Planning Organization (MPO) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties. SCAG is mandated by the federal government to develop a multimodal long-range transportation plan that provides a 20-year vision for investing in our transportation system and update it at least once every four years. The 2016-2040 RTP/SCS, addresses all modes of our transportation system, and reflects research and policy initiatives from each mode: active transportation, aviation and airport ground access, corridor planning, goods movement, high-speed rail, intelligent transportation systems, safety and security, transit, and transportation finance (SCAG 2017).

#### **Congestion Management Program**

Ventura County Transportation Commission (VCTC) is the designated Congestion Management Authority (CMA) for Ventura County and is responsible for coordinating land use, transportation planning, and air quality to mitigate traffic congestion (VCTC 2017). The Congestion Management Program (CMP) provides local agencies and private



developers the procedures and tools necessary to manage and decrease traffic congestion in the County (VCTC 2009).

### Local Regulations

The City of Oxnard Public Works Division collects traffic impact fees based on project generated traffic that would impact roadways within the City's jurisdiction. Standard conditions of permit issuance initiate collection of these fees for all projects within the City of Oxnard, regardless of whether the project is a private or a public project.

## 3.15.2 Impact Analysis

### 3.15.2.1 Methodology

#### Traffic Analysis Scenarios

Pursuant to CEQA and City traffic impact study requirements, the traffic analysis includes the following traffic scenarios:

- Existing Conditions;
- Existing plus Project Conditions;
- Cumulative (Existing plus approved and pending projects) Conditions;
- Cumulative plus Project Conditions;
- Buildout Conditions; and
- Buildout plus Project Conditions.

#### Level of Service Criteria

The traffic analysis focuses on key intersections within the study area during the AM and PM commute periods, when peak traffic volumes typically occur. A LOS ranking scale is used to identify the operating condition at intersections. This scale compares traffic volumes to intersection capacity and assigns a letter value to this relationship. The letter scale ranges from A to F with LOS A representing free flow conditions and LOS F representing congested conditions.

The City of Oxnard considers LOS C or better acceptable for intersection operations, with LOS D acceptable at the following intersections only:

- Oxnard Boulevard with Gonzales Road;
- Oxnard Boulevard with Vineyard Avenue;
- Rose Avenue with Gonzales Road;
- Wooley Road with Oxnard Boulevard/Saviers Road (Five Points); and
- Wooley Road with C Street.

Caltrans has established the cusp of the LOS C/D range as the target level of service standard for State Highway facilities.

#### Level of Service Calculation Methodology

**City of Oxnard.** Pursuant to Oxnard Traffic Study Guidelines, the Intersection Capacity Utilization Methodology (ICU) was used to determine levels of service for signalized intersections, and the results are shown as a volume-to-capacity (V/C) ratio. Level of service for the unsignalized intersections in the study area were calculated using the methodologies outlined in the Highway Capacity Manual (HCM) (TRB 2016).

**Caltrans.** Levels of service for State intersections were analyzed based on the HCM methodologies. Intersection levels of service were calculated using Synchro software (Trafficware Ltd. 2018), which implements the HCM methodology to determine intersection levels of service, control delays and queue lengths for each approach.

### 3.15.2.2 Significance Thresholds

**City of Oxnard.** The City has adopted LOS C as the threshold of significance for intersections during environmental review.

The City of Oxnard's criteria for evaluating project impacts at intersections is based upon the change in volume-to-capacity ratio attributable to the project. The City of Oxnard has adopted the following guidelines to prepare a traffic study and determine a project's effects on intersections (per City Resolution No. 10,453);

Traffic studies shall include a list of intersections where the project will worsen the ICU numeric value of LOS by V/C 0.02 or more. This ICU list shall include intersections projected to be at LOS C with background traffic (existing plus approved plus pending projects) and LOS D, E, or F with background traffic plus project generated traffic.

At intersections where the project increases the ICU by .02 to .039, a list shall be prepared that identifies the improvements necessary to mitigate the identified project impact. City staff will then determine the amount of participation from the project for the necessary improvements. The developer shall mitigate the project's impacts to the circulation system by:

- (A) Construction of all master-planned facilities within the project area, consisting of half the master planned roadways abutting the project area, plus one lane. "Roadways" include related improvements, such as sidewalks, curbs, gutters, and drainage facilities. "Project Area" means the area shown on the approved plans.
- (B) Construction of all improvements necessary to mitigate impacts to intersections that the ICU list shows will be worsened by .02 or more (subject to mitigation fee limit).

The City of Oxnard Public Works Division collects traffic impact fees based on project generated traffic that would impact roadways within the City's jurisdiction. Standard conditions of permit issuance initiate collection of these fees for all projects within the City of Oxnard, regardless of whether the project is a private or a public project.

**Caltrans.** Caltrans has established the cusp of the LOS C/D range as the target level of service standard for State Highway intersections. If an existing State Highway facility is operating at less than the target LOS, the existing Measure of Effectiveness (MOE) should be maintained.

The thresholds for transportation impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
- *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*
- *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- *Would the project result in inadequate emergency access?*

### 3.15.2.3 Project Impacts

***Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

As noted above, the 2016-2040 RTP/SCS, addresses all modes of our transportation system, and reflects research and policy initiatives from each mode: active transportation, aviation and airport ground access, corridor planning,

goods movement, high-speed rail, intelligent transportation systems, safety and security, transit, and transportation finance (SCAG 2017). The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. Table 3-19 provides a project consistency analysis with relevant 2016 RTP/SCS goals identified by SCAG in their response to the NOP for the project.

**Table 3-19.** 2016 RTP/SCS Consistency Analysis

Policy	Consistency Analysis
<p><b>RTP/SCS G1:</b> Align the plan investments and policies with improving regional economic development and competitiveness;</p> <p><b>RTP/SCS G7:</b> Actively encourage and create incentives for energy efficiency, where possible; and,</p> <p><b>RTP/SCS G9:</b> Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.</p>	<p><b>Not Applicable:</b> The proposed project would provide public educational services and would not be creating regional land use policies that could impact regional economic development, energy efficiency policies, or security improvements to the regional transportation system.</p>
<p><b>RTP/SCS G2:</b> Maximize mobility and accessibility for all people and goods in the region;</p> <p><b>RTP/SCS G3:</b> Ensure travel safety and reliability for all people and goods in the region;</p> <p><b>RTP/SCS G4:</b> Preserve and ensure a sustainable regional transportation system;</p> <p><b>RTP/SCS G5:</b> Maximize the productivity of our transportation system;</p> <p><b>RTP/SCS G6:</b> Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking); and,</p> <p><b>RTP/SCS G8:</b> Encourage land use and growth patterns that facilitates transit and active transportation.</p>	<p><b>Consistent:</b> The proposed project is a comprehensive neighborhood high school to meet the educational needs of District students. The project Site is an infill site surrounded by existing residential development and is identified in the City of Oxnard 2030 General Plan as a potential school site. The proposed project includes required roadway improvements needed to provide adequate service to the project Site as identified in Section 2.3 and evaluated herein in Section 3.15. It is anticipated that students attending the proposed school will come from the surrounding neighborhood and would be able to utilize a variety of transportation modes including walking, bicycling, bus and/or vehicles on the local roadway network.</p>

A TCS was prepared for the proposed project (see the TCS in Appendix K). As part of the TCS, traffic counts were collected at 21 intersections for AM and PM peak hours. Trip generation estimates were determined for the project Site based on anticipated enrollment and standard trip generation rates. The trip generation was coordinated with City of Oxnard staff. Trips were distributed based on school routes and student information. The TCS calculated intersection LOS for existing conditions, cumulative conditions, and buildout conditions with and without the proposed project. Cumulative conditions were developed based on a list of related (approved and pending) projects provided by City of Oxnard staff and 2030 General Plan traffic data from the Oxnard Traffic Model (OTM).

### Project Trip Generation

The OUHSD proposes a new senior high school with a maximum enrollment at buildout of 2,500 students. Trip generation estimates for the proposed high school were developed based on the rates presented in the Institute of

Transportation Engineers *Trip Generation Manual* (ITE 2017) for *Land Use #530 – High School*. Table 3-20 summarizes the trip generation estimates for the project.

Table 3-20 indicates that the project is expected to generate 5,075 average daily trips (ADT), with 1,300 trips occurring during the AM peak hour and 350 trips occurring during the PM peak hour. It should be noted that the trip generation estimate is considered conservative. A significant portion of students that will attend the new high school currently attend other schools, and trips generated by these existing students will not be new to the study area, but be trips diverted from its original route to the new high school.

**Table 3-20. Project Trip Generation**

Land Use	Size	ADT		A.M. PHT		P.M. PHT	
		Rate	Trips	Rate	Trips	Rate	Trips
High School	2,500 students	2.03	5,075	0.52	1,300 (871/429)	0.14	350 (168/182)

Notes:

ADT     average daily trips

PHT     peak hour trips

(X/X)   inbound trips/outbound trips

### Project Trip Distribution

Project trips were distributed and assigned to the local street network based on the preliminary high school attendance boundary limits provided by OUHSD and the distribution of residential areas within this boundary, and existing travel patterns in the study-area. The preliminary high school attendance boundary is shown in the TCS (Exhibit 5), and the distribution percentages and project-added traffic volumes are shown in the TCS (Exhibits 6 and 7, respectively). The TCS (Exhibit) 8 illustrates the school driveway volumes.

### Existing Plus Project Intersection Operations

Project generated traffic was added to the existing peak hour traffic volumes and levels of service were recalculated for existing plus project conditions assuming the proposed frontage improvements discussed in the TCS. The improvements would result in increased capacity at the intersections of Rose Avenue with Camino De La Luna and Camino Del Sol and at the Camino Del Sol/Gibraltar Street intersection, by adding turning lanes and through lanes at intersection approaches. The intersection geometries under project-specific conditions are shown in the TCS (Exhibit 9) and the existing plus project traffic volumes are illustrated in the TCS (Exhibit 10). Table 3-21 summarizes the LOS calculations for existing plus project-specific conditions.

As shown in Table 3-21, most intersections will continue to operate at LOS C or better during both peak hours. The Rose Avenue/Camino De La Luna intersection, which would be widened and signalized, would experience improved operations. Similarly, operations at the Rose Avenue/Camino Del Sol intersection would also improve because of additional capacity under project-specific conditions. The Camino Del Sol/Gibraltar Street intersection, which would provide main access to the high school is expected to operate acceptably based on the City's ICU calculation method. A Site access analysis that evaluates delays and queue lengths during the AM peak hour is provided in the Site Access and Circulation section of the TCS.

The project would degrade the level of service at the Rose Avenue/Cesar Chavez Drive intersection and the Camino Del Sol/Colonia Road intersection from LOS C to LOS D during the AM peak Hour, thereby generating a project-specific impact at these locations. Mitigation Measures TRAF-1, TRAF-2, and TRAF-3 have been added to reduce potentially significant project-specific traffic impacts to a less than significant level.

### Cumulative Conditions

The City of Oxnard requires that the study-area intersections are analyzed assuming cumulative traffic conditions, which include traffic that could be generated by other developments in the study area that are expected to be

constructed in the near future. The following section discusses the cumulative (existing conditions plus approved and pending projects) conditions.

**Table 3-21.** Existing plus Project Intersection Levels of Service

Intersection	AM Peak Hour		PM Peak Hour	
	Existing ICU - HCM/LOS	Existing + Project ICU – HCM/LOS	Existing ICU - HCM/LOS	Existing + Project ICU – HCM/LOS
1. Rose Ave/U.S. 101 NB Ramps (CT)	8.7/LOS A	8.8/LOS A	9.6/LOS A	9.6/LOS A
2. Rose Ave/U.S. 101 SB Ramps (CT)	12.1/LOS B	12.9/LOS B	15.8/LOS B	16.1/LOS B
3. Rose Ave/Lockwood St	0.68/LOS B	0.69/LOS B	0.65/LOS B	0.66/LOS B
4. Rose Ave/Gonzales Rd	0.65/LOS B	0.67/LOS B	0.71/LOS C	0.73/LOS C
5. Rose Ave/Cesar Chavez Drive	0.72/LOS C	<b>0.82/LOS D</b>	0.72/LOS C	0.75/LOS C
6. Rose Ave/Camino De La Luna <sup>1 2</sup>	<b>26.8/LOS D</b>	0.67/LOS B	<b>25.3/LOS D</b>	0.69/LOS B
7. Rose Ave/Camino Del Sol <sup>1</sup>	0.69/LOS B	0.68/LOS B	0.73/LOS C	0.61/LOS B
8. Rose Ave/San Gorgonio Ave	0.56/LOS A	0.63/LOS B	0.57/LOS A	0.58/LOS A
9. Rose Ave/First St	0.49/LOS A	0.58/LOS A	0.51/LOS A	0.52/LOS A
10. Rose Ave/Santa Lucia Ave	0.54/LOS A	0.60/LOS A	0.60/LOS A	0.61/LOS B
11. Rose Ave/Third St	0.49/LOS A	0.52/LOS A	0.57/LOS A	0.58/LOS A
12. Rose Ave/Eastman Ave	0.44/LOS A	0.47/LOS A	0.57/LOS A	0.58/LOS A
13. Rose Ave/Fifth St	0.63/LOS B	0.64/LOS B	0.71/LOS C	0.71/LOS C
14. Camino Del Sol/Juanita Ave	15.5/LOS C	17.5/LOS C	9.9/LOS A	10.1/LOS B
15. Camino Del Sol/Colonia Rd	16.9/LOS C	<b>25.3/LOS D</b>	11.4/LOS B	11.8/LOS B
16. Camino Del Sol/Gibraltar St <sup>1 2</sup>	12.5/LOS B	0.61/LOS B	17.2/LOS C	0.51/LOS A
17. Camino Del Sol/Kohala St	0.47/LOS A	0.49/LOS A	0.54/LOS A	0.55/LOS A
18. Rice Ave/U.S. 101 NB Ramps (CT)	16.7/LOS B	16.7/LOS B	20.9/LOS C	20.9/LOS C
19. Rice Ave/U.S. 101 SB Ramps (CT)	7.6/LOS A	7.6/LOS A	9.6/LOS A	9.6/LOS A
20. Rice Ave/Gonzales Rd	0.72/LOS C	0.72/LOS C	0.60/LOS A	0.60/LOS A
21. Rice Ave/Camino Del Sol	0.49/LOS A	0.51/LOS A	0.59/LOS A	0.60/LOS A

<sup>1</sup> Intersection widening and geometry improvements under project-specific conditions.

<sup>2</sup> Intersection signalized under project-specific conditions.

### Street Network Improvements

Review of roadway or intersection improvements associated with approved projects included in the cumulative analysis and the City's Five-Year Capital Improvement Plan (City of Oxnard 2019f) indicates that the following improvements are expected to be constructed under cumulative conditions (without the proposed high school):



**Rose Avenue from Cesar Chavez Drive to Camino Del Sol.** The residential/commercial development proposed on the northern and southwest portions of the Maulhardt Property (Urban Village) will widen Rose Avenue to Primary Arterial standards, resulting in three northbound and southbound travel lanes and a raised median, and add a sidewalk to the east side. Additional intersection capacity will be provided at Cesar Chavez Drive, Camino De La Luna and Camino Del Sol.

**Cesar Chavez Drive from Rose Avenue to Gibraltar Street.** The residential/commercial development proposed on the northern portion of the Maulhardt Property (Urban Village) will widen Cesar Chavez Drive along its frontage to residential street standards.

**San Geronio and First Street Realignment.** This CIP project will construct an extension of San Geronio Avenue and a new connection at Rose Avenue at a four-leg intersection. The signal at First Street will be removed and the intersection will be restricted to right-turn in-and-out only movements.

**Rice Avenue/Fifth Street Grade Separation.** This project will construct a six-lane overcrossing on Rice Avenue over Fifth Street/SR 34 and ramp connections to Fifth Street/SR 34.

The TCS (Exhibit 11) shows the intersection geometries under cumulative conditions. No changes were applied to San Geronio Avenue as realignment information was not available.

### Cumulative Traffic Volumes

Cumulative traffic volumes were developed using a list of approved and pending development projects in the City of Oxnard provided by City staff (City of Oxnard 2019g). In addition, traffic generated by the adjacent residential/commercial development (Urban Village) was included. A map showing the approved and pending projects within the study area is included in the TCS (Technical Appendix).

Trip generation estimates were developed for the pending projects based on rates contained in the Institute of Transportation Engineers (ITE) *Trip Generation* for the respective land uses. A trip generation worksheet is also included in the TCS (Technical Appendix). The cumulative projects traffic volumes were distributed onto the study-area street network based on each individual project's location, existing traffic patterns, and a general knowledge of the residential and commercial lay-out of the Oxnard area. The cumulative projects AM and PM peak turning volumes were assigned to the study area intersections and added to the existing peak hour volumes. The resulting cumulative peak hour volumes are shown in the TCS (Exhibit 12) and the cumulative plus project peak hour volumes are illustrated in the TCS (Exhibit 13).

### Cumulative Plus Project Intersection Operations

Intersection LOS were recalculated assuming cumulative and cumulative plus project traffic conditions. The LOS calculations are summarized in Table 3-22.

**Table 3-22.** Cumulative Plus Project Intersection Levels of Service

Intersection	AM Peak Hour		PM Peak Hour	
	Cumulative ICU - HCM/LOS	Cumulative + Project ICU - HCM/LOS	Cumulative ICU - HCM/LOS	Cumulative + Project ICU - HCM/LOS
1. Rose Ave/U.S. 101 NB Ramps (CT)	8.6/LOS A	8.7/LOS A	10.7/LOS B	10.7/LOS B
2. Rose Ave/U.S. 101 SB Ramps (CT)	13.6/LOS B	14.6/LOS B	20.1/LOS C	20.5/LOS C
3. Rose Ave/Lockwood St	0.73/LOS C	0.74/LOS C	0.71/LOS C	0.72/LOS C
4. Rose Ave/Gonzales Rd	0.73/LOS C	0.75/LOS C	0.78/LOS C	0.79/LOS C

Intersection	AM Peak Hour		PM Peak Hour	
	Cumulative ICU - HCM/LOS	Cumulative + Project ICU – HCM/LOS	Cumulative ICU - HCM/LOS	Cumulative + Project ICU – HCM/LOS
5. Rose Ave/Cesar Chavez Drive <sup>1</sup>	0.65/LOS B	0.71/LOS B	0.67/LOS B	0.68/LOS B
6. Rose Ave/Camino De La Luna <sup>1 2</sup>	0.53/LOS A	0.67/LOS B	0.71/LOS C	0.72/LOS C
7. Rose Ave/Camino Del Sol <sup>1</sup>	0.54/LOS A	0.70/LOS C	0.65/LOS B	0.66/LOS B
8. Rose Ave/San Gorgonio Ave	0.58/LOS A	0.66/LOS B	0.61/LOS B	0.62/LOS B
9. Rose Ave/First St	Intersection reconstructed to restrict movements to right-turns only			
10. Rose Ave/Santa Lucia Ave	0.56/LOS A	0.62/LOS B	0.64/LOS B	0.65/LOS B
11. Rose Ave/Third St	0.51/LOS A	0.55/LOS A	0.59/LOS A	0.61/LOS B
12. Rose Ave/Eastman Ave	0.47/LOS A	0.50/LOS A	0.58/LOS A	0.58/LOS A
13. Rose Ave/Fifth St	0.66/LOS B	0.67/LOS B	0.72/LOS C	0.73/LOS C
14. Camino Del Sol/Juanita Ave	15.8/LOS C	17.9/LOS C	10.1/LOS B	10.2/LOS B
15. Camino Del Sol/Colonia Rd	19.4/LOS C	<b>33.7/LOS E</b>	12.0/LOS B	12.5/LOS B
16. Camino Del Sol/Gibraltar St <sup>3</sup>	13.0/LOS B	0.61/LOS B	18.8/LOS C	0.53/LOS A
17. Camino Del Sol/Kohala St	0.48/LOS A	0.49/LOS A	0.55/LOS A	0.57/LOS A
18. Rice Ave/U.S. 101 NB Ramps (CT)	16.7/LOS B	17.2/LOS B	20.8/LOS C	20.8/LOS C
19. Rice Ave/U.S. 101 SB Ramps (CT)	7.5/LOS A	7.5/LOS A	9.7/LOS A	10.7/LOS A
20. Rice Ave/Gonzales Rd	0.75/LOS C	0.75/LOS C	0.60/LOS A	0.60/LOS A
21. Rice Ave/Camino Del Sol	0.53/LOS A	0.55/LOS A	0.64/LOS B	0.65/LOS B

<sup>1</sup> Intersection widening and geometry improvements under cumulative conditions.

<sup>2</sup> Intersection signalized under cumulative conditions.

<sup>3</sup> Intersection signalized under cumulative + project conditions.

Table 3-22 indicates that the project would generate a cumulative impact based on City of Oxnard impact thresholds at the Camino Del Sol/Colonia Road intersection, which is forecast to operate in the LOS E range with cumulative plus project traffic. Mitigation Measure TRAF-4 has been added to reduce potentially significant cumulative traffic impacts to a less than significant level.

## Buildout Conditions

### Buildout Traffic Volumes

Traffic volumes for City of Oxnard General Plan buildout conditions are derived from the OTM Year 2030 volumes, which were provided by City staff. The buildout plus project volumes generated by the Model include traffic generated by the proposed High School No. 8 and the adjacent residential/commercial development (Urban Village). Buildout without project volumes were developed by removing project traffic from the forecasts, and adding traffic generated by the Site's development as included in the *East Village Phase III Annexation* (City of Oxnard 2012). It is noted that the OTM generated volumes for 11 intersections. Stantec developed buildout volumes for the remaining 10 intersections by extrapolating buildout additions through the study area corridors. The school Site is included in the *East Village Phase III Annexation* as 36.5 acres with a density of 4.5 dwelling units per acre, resulting in a total of 164 single family dwellings. The project trip generation adjustments under buildout plus project conditions are shown in Table 3-23.

**Table 3-23.** Project Trip Generation – Buildout Conditions

Land Use	Size	ADT Trips	AM PHT Trips	PM PHT Trips
East Village Single Family Dwelling	164 DU	1,548	121 (30/91)	162 (102/60)
Proposed Project High School	2,500 students	5,075	1,300 (871/429)	350 (168/182)
<b>Net Difference</b>		<b>3,527</b>	<b>1,179 (841/338)</b>	<b>188 (66/122)</b>

ADT = average daily trips. PHT = peak hour trips. (X/X) = inbound trips/outbound trips.

The 2030 Oxnard Traffic Model peak hour traffic volumes without and with the OUHSD High School No. 8 are shown in the TCS (Exhibits 14 and 15, respectively).

### Street Network Improvements

The City's buildout network in the traffic model includes the extension of Camino Del Sol to Oxnard Boulevard, which will divert traffic from Colonia Road to Camino Del Sol. Further, the *City of Oxnard 2030 General Plan Circulation Diagram* indicates that Camino Del Sol between Rose Avenue and Del Norte Boulevard is programmed to become a Primary Arterial (six lanes). The Rose Avenue/Fifth Street intersection will be reconfigured to an Arterial Interchange and the Rice Avenue/Camino Del Sol intersection will be reconfigured to a Freeway Interchange. Given that the improvement plans, or construction timing information are not available, the buildout analysis does not assume these network changes.

### Buildout Plus Project Intersection Operations

Intersection LOS were recalculated assuming buildout and buildout plus project conditions. Table 3-24 summarizes the buildout and buildout plus project LOS calculations.

**Table 3-24.** Buildout plus Project Intersection Levels of Service

Intersection	AM Peak Hour		PM Peak Hour	
	Buildout ICU - HCM/LOS	Buildout + Project ICU – HCM/LOS	Buildout ICU - HCM/LOS	Buildout + Project ICU – HCM/LOS
1. Rose Ave/U.S. 101 NB Ramps (CT)	13.9/LOS B	14.1/LOS B	25.7/LOS C	25.7/LOS C
2. Rose Ave/U.S. 101 SB Ramps (CT)	13.4/LOS B	15.4/LOS B	21.3/LOS C	21.4/LOS C
3. Rose Ave/Lockwood St	<b>0.82/LOS D</b>	<b>0.82/LOS D</b>	0.75/LOS C	0.75/LOS C
4. Rose Ave/Gonzales Rd	<b>0.89/LOS D</b>	<b>0.89/LOS D</b>	<b>0.96/LOS E</b>	<b>0.97/LOS E</b>
5. Rose Ave/Cesar Chavez Drive <sup>1</sup>	0.68/LOS B	0.71/LOS B	0.73/LOS C	0.74/LOS C
6. Rose Ave/Camino De La Luna <sup>1 2</sup>	0.57/LOS A	0.72/LOS C	0.79/LOS C	0.79/LOS C
7. Rose Ave/Camino Del Sol <sup>1</sup>	0.63/LOS B	0.76/LOS C	<b>0.83/LOS D</b>	<b>0.83/LOS D</b>
8. Rose Ave/San Gorgonio Ave	0.67/LOS B	0.75/LOS C	0.67/LOS B	0.69/LOS B
9. Rose Ave/First St	Intersection reconstructed to restrict movements to right-turns only			

Intersection	AM Peak Hour		PM Peak Hour	
	Buildout ICU - HCM/LOS	Buildout + Project ICU – HCM/LOS	Buildout ICU - HCM/LOS	Buildout + Project ICU – HCM/LOS
10. Rose Ave/Santa Lucia Ave	0.64/LOS B	0.70/LOS B	0.64/LOS B	0.65/LOS B
11. Rose Ave/Third St	0.54/LOS A	0.57/LOS A	0.68/LOS B	0.68/LOS B
12. Rose Ave/Eastman Ave	0.49/LOS A	0.52/LOS A	0.65/LOS B	0.65/LOS B
13. Rose Ave/Fifth St	<b>1.00/LOS F</b>	<b>1.02/LOS F</b>	<b>1.17/LOS F</b>	<b>1.18/LOS F</b>
14. Camino Del Sol/Juanita Ave	<b>26.2/LOS D</b>	<b>31.9/LOS D</b>	19.5/LOS C	20.0/LOS C
15. Camino Del Sol/Colonia Rd	18.0/LOS C	24.6/LOS C	<b>25.7/LOS D</b>	<b>27.2/LOS D</b>
16. Camino Del Sol/Gibraltar St <sup>3</sup>	16.3/LOS C	0.62/LOS B	<b>42.8/LOS E</b>	0.59/LOS A
17. Camino Del Sol/Kohala St	0.56/LOS A	0.56/LOS A	0.62/LOS B	0.63/LOS B
18. Rice Ave/U.S. 101 NB Ramps (CT)	20.4/LOS C	20.4/LOS C	<b>38.4/LOS D</b>	<b>38.4/LOS D</b>
19. Rice Ave/U.S. 101 SB Ramps (CT)	13.4/LOS B	13.4/LOS B	16.2/LOS B	16.2/LOS B
20. Rice Ave/Gonzales Rd	<b>0.97/LOS E</b>	<b>0.97/LOS E</b>	<b>1.11/LOS F</b>	<b>1.11/LOS F</b>
21. Rice Ave/Camino Del Sol	<b>0.92/LOS E</b>	<b>0.93/LOS E</b>	<b>0.99/LOS E</b>	<b>0.99/LOS E</b>

<sup>1</sup> Intersection widening and geometry improvements under buildout conditions.

<sup>2</sup> Intersection signalized under buildout conditions.

<sup>3</sup> Intersection signalized under buildout + project conditions.

As shown, nine intersections are forecast to operate below the City's and Caltrans LOS C standard under buildout plus project conditions. The project would generate a buildout impact at the intersections of Camino Del Sol with Juanita Avenue and Colonia Road, which are assumed to be all-way stop controlled. The project would not exceed the City's impact threshold of V/C 0.02 at the remaining intersections that would operate below LOS C. Mitigation Measure TRAF-5 has been added to reduce potentially significant buildout traffic impacts to a less than significant level.

It is noted that the buildout analysis does not incorporate the 2030 General Plan Circulation Element improvements discussed previously. Camino Del Sol between Rose Avenue and Del Norte Boulevard is programmed to become a Primary Arterial (six lanes). The Rose Avenue/Fifth Street intersection will be reconfigured to an Arterial Interchange and the Rice Avenue/Camino Del Sol intersection will be reconfigured to a Freeway Interchange. Given that Rice Avenue will be configured to freeway standards between the U.S. 101 and Wooley Road, the Rice Avenue/Gonzales Road intersection would also need to be reconfigured to a Freeway Interchange.

### Project Site Access, Circulation and Parking

#### Site Access

**Vehicular Access.** Figure 2-3 shows that access is proposed via three new driveways on the north side of Camino Del Sol and three driveways on the south side of the extended segment of Jacinto Drive. The TCS (Exhibit 16) shows the buildout plus project access traffic volumes.

The driveway connection to the Camino Del Sol/Gibraltar Street intersection will be signalized and will provide full access to the high school main drop-off and pick-up loop and parking areas. An analysis was completed using Synchro software (Trafficware Ltd. 2018) for the AM commute period, during which the majority of school traffic will be generated during a peak 5-minute period. The analysis, which was completed using cumulative and buildout turning volumes, indicates that the eastbound left-turn lane should be extended to the maximum length available to accommodate the eastbound left-turn movement into the high school main driveway (461 AM PHT). The peak queue is shown as 880 feet during the 25-minute AM peak period. Given that the spacing between Gibraltar Street and the Camino Del Sol Senior Apartments driveway to the west is approximately 950 feet, back to back left-turn lanes could be provided to adequately accommodate left-turns into the senior center and the high school.

It is noted that the 2030 General Plan Circulation Element includes Camino Del Sol between Rose Avenue and Del Norte Boulevard as a Primary Arterial (six lanes), and capacity and intersection signal timing may therefore change under buildout conditions.

The driveway on Camino Del Sol located west of Gibraltar Street will be restricted to right-turns only. The driveway on Camino Del Sol proposed east of Gibraltar Road will be restricted to right-turns only. These driveways are expected to operate acceptably based on the turn restrictions.

Two driveways on Jacinto Drive will provide access to parking areas for the athletic facilities. The driveway proposed along the eastern boundary of the Site will provide access to a secondary drop-off/pick-up loop and school parking areas. Based on the forecast traffic volumes on Jacinto Drive and the turning volumes at the high school driveways, it is expected that these driveways will operate acceptably.

**Bicycle Access.** Class II bicycle lanes are provided on Rose Avenue north of Camino Del Sol and, Camino Del Sol from Garfield Avenue to Del Norte Boulevard, and on Gonzales Road from Victoria Avenue to Rice Avenue. Buildout of Rose Avenue and Camino Del Sol along the project's frontage will include provision of Class II bicycle lanes, and a bicycle path along the north side of the new segment of Jacinto Drive along the project's northern boundary. These new bicycle facilities should be designed to connect to the surrounding bicycle network. Consideration should be given to install buffered bicycle lanes where feasible to provide increased separation between vehicle and bicycle lanes.

As discussed previously, the City's *Bicycle & Pedestrian Master Plan* (City of Oxnard 2011b) proposed bicycle facilities includes new Class II bicycle lanes on Rose Avenue south of Camino De Sol and a bicycle boulevard on Cesar Chavez Drive from Juanita Avenue to Rice Avenue. These bicycle facility additions will further enhance the study area bicycle network.

**Pedestrian Access.** Pedestrian access to the high school is provided via existing and future sidewalks along Rose Avenue, Camino Del Sol and Jacinto Drive. Project improvements will include new sidewalks along its frontage and new crosswalks at the Rose Avenue/Camino De La Luna intersection and Camino Del Sol/Gibraltar Street intersection, which will be signalized. The existing crosswalks at the Rose Avenue/Camino Del Sol intersection will be modified to school crosswalk markings.

To provide a pedestrian connection between the high school and the Urban Village, crosswalks are proposed at the three Urban Village roadway intersections with Jacinto Drive. Because these intersections will be unsignalized, the appropriate school crosswalk markings and signage should be installed.

Pedestrian connections will be provided between the frontage sidewalks and the high school's internal sidewalk and walkway circulation system. Pedestrian connections should be provided at or nearby each high school driveway intersection with Camino Del Sol and Jacinto Drive, in order to ensure a clear and direct pathway into the Site.

Existing GCT bus stops are located on Rose Avenue at Socorro Way in both directions and south of Camino Del Sol in both directions (northbound bus stop is located in the right-turn lane). A new bus stop will be constructed on Rose Avenue north of Camino Del Sol in the northbound direction. This new bus stop would replace the existing bus stop



located south of Camino Del Sol. The OUHSD and developer of the Urban Village should coordinate construction of other locations, such as bus stops at Camino De La Luna, with GCT.

### **Circulation**

The on-Site circulation system is comprised of four driveways which provide access to three drop-off/pick-up loops and the parking areas. The driveway on Camino Del Sol proposed opposite Gibraltar Street provides access to the main drop-off and pick-up loop. The ingress driveway and loop contain two lanes with approximately 850 feet of curb length for student drop-off and pick-up. The inside lane will be used as curb drop-off/pick-up and the outside lane will be used to progress traffic. The length of the main loop, in combination with the secondary drop-off/pick-up loops along the high school's east side, are expected to provide sufficient vehicle queue storage to accommodate the expected peak traffic movements. Egress from the main loop is provided via the driveway on Camino Del Sol proposed opposite Gibraltar Street or the driveway proposed opposite the Camino Del Sol Senior Apartments driveway. This driveway will initially will be restricted to right-turn egress only.

Bicycle lanes should be provided along the main driveway and an on-Site bicycle circulation plan should be developed to indicate the travel paths to the bicycle parking areas. Bicycle racks should be provided at designated locations near the high school buildings.

### **School Bus Transportation**

The OUHSD will provide school bus transportation services to and from the proposed high school. Busses will travel via designated routes with frequent stops within the school boundary area at the on-site bus drop-off and pick-up area. Busses will arrive prior to start of bell schedule (i.e., 7:40 a.m.) and depart after end of regular bell schedule (i.e., 3:15 p.m.). The bus curb loading zone will be located along the school's eastern side between the buildings and the student parking lots, and would be accessed via the proposed driveway between Camino Del Sol and Jacinto Drive. The design of the school circulation system should incorporate school bus turning requirements (swept paths) along the on-site bus route.

### **Parking**

Figure 2-3 indicates that the proposed parking supply consists of 700 regular spaces and 22 accessible spaces, for a total of 722 spaces. The parking area between Camino Del Sol and the main drop-off/pick-up loop (Parking Lot A) contains 290 spaces and is designated for staff and visitors. The student parking area (Parking Lot B) is located along the Site's eastern boundary and contains 294 spaces. A separate parking lot (Parking Lot C) with 61 spaces is located between the stadium and Jacinto Drive, and a community parking lot (Parking Lot D), located east of Rose Avenue and south of Jacinto Drive provides 77 spaces. The City of Oxnard parking requirement for high schools is five spaces per classroom, plus one space for each five seats utilized for auditorium purposes. Based on this requirement, a total of 465 spaces are required for 93 teaching spaces, with 257 spaces remaining for the auditorium.

Incorporation of Mitigation Measures TRAF-1, TRAF-2, TRAF-3, TRAF-4, and TRAF-5 would reduce all potentially significant impacts related to transportation to a less than significant level.

### ***Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

#### **Vehicle Miles Traveled (VMT)**

State Senate Bill 743 (2013), which was codified in Public Resources Code section 21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (*Id.*, subd. (b)(1); see generally, adopted CEQA Guidelines, §15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, Office of Planning and Research (OPR) has proposed, and the California Natural Resources Agency

(Agency) has certified and adopted, changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts.

A project would have a significant effect on the environment if it would cause substantial additional VMT. The OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018) recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets screening criteria, then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required.

Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends quantified thresholds for these land uses for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In general, the recommended "Threshold of Significance" is if a proposed project exceeds a level of 15 percent below existing regional VMT for that type of project, a significant transportation impact may be generated. However, for other uses (i.e., retail projects), a net increase in total VMT may indicate a significant transportation impact.

### **VMT Analysis**

The VCTC is in the process of updating the County-wide traffic model (VCTM) so regional household and non-household VMT levels can be determined. The City of Oxnard has not yet started this process. At this time, no VMT data for residential, office, retail or other land uses is available, and no threshold of significance can be applied to school related VMT.

While the proposed high school Site is expected to add traffic within the study-area, the new high school will also capture school related trips within the study-area (tour-based VMT), resulting in an overall reduction of school related trip lengths for parents and students. Therefore, potential impacts would be less than significant.

### **Induced Automobile Travel Analysis**

A project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network. OPR's proposed transportation impact guidelines includes a list of transportation project types that would not likely lead to a substantial or measurable increase in VMT. If a project fits within the general types of projects (including combinations of types), then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required.

The proposed project is not a transportation project. While the project would improve or reconstruct existing facilities, no new capacity or network changes are anticipated, and impacts would be less than significant.

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

The proposed project would be designed and constructed to meet required standards. Sight distance at the project accesses would comply with standard Caltrans and City of Oxnard sight distance standards. The final grading, landscaping, and street improvement plans would demonstrate that sight distance standards are met. Such plans would be reviewed by the City and approved as consistent with this measure prior to issuance of the grading permits. No slope or object over 30 inches would be in the line of sight area. Per the TCS (Appendix K), there would be no increase in hazards due to a design feature or incompatible uses. Therefore, with compliance with existing regulations, project impact would be less than significant, and no mitigation is required.

### ***Would the project result in inadequate emergency access?***

The proposed project would not restrict or reduce emergency access to the project Site. The proposed project would be designed and constructed to meet required standards including adequate emergency access. All driveways would be designed according to City standards to facilitate emergency vehicle access. As part of

standard development procedures, Site plans would be submitted for review and approval to ensure adequate emergency access prior to construction. Therefore, with compliance with existing requirements, project impact would be less than significant, and no mitigation is required.

### 3.15.2.4 Cumulative Impacts

Cumulative traffic volumes were developed using a list of approved and pending development projects in the City of Oxnard provided by City staff (City of Oxnard 2019g). In addition, traffic generated by the adjacent residential/commercial development (Urban Village) is included. Trip generation estimates were developed for the pending projects based on rates contained in ITE *Trip Generation* for the respective land uses. A trip generation worksheet is also included in the TCS (Technical Appendix). The cumulative projects traffic volumes were distributed onto the study-area street network based on each individual project's location, existing traffic patterns, and a general knowledge of the residential and commercial lay-out of the Oxnard area. The cumulative projects AM and PM peak turning volumes were assigned to the study area intersections and added to the existing peak hour volumes.

Intersection LOS were recalculated assuming cumulative and cumulative plus project traffic conditions. The LOS calculations are summarized in Table 3-24. Table 3-24 indicates that the project would generate a cumulative impact based on City of Oxnard impact thresholds at the Camino Del Sol/Colonia Road intersection, which is forecast to operate in the LOS E range with cumulative plus project traffic. Mitigation Measure TRAF-4 has been added to reduce potentially significant cumulative traffic impacts to a less than significant level.

The City of Oxnard Public Works Division collects traffic impact fees based on project generated traffic that would impact roadways within the City's jurisdiction. Standard conditions of permit issuance initiate collection of these fees for all projects within the City of Oxnard, regardless of whether the project is a private or a public project.

### 3.15.2.5 Mitigation Measures

**TRAF-1: Rose Avenue/Cesar Chavez Drive Intersection (Project-Specific).** The project-specific analysis found that the project would generate a project-specific impact based on City of Oxnard impact thresholds at the Rose Avenue/Cesar Chavez Drive intersection. The project would degrade the level of service from LOS C to LOS D during the AM peak hour. The project-specific analysis includes the widening of Rose Avenue from Camino De La Luna to Camino Del Sol. Construction of the Urban Village development will widen Rose Avenue from Cesar Chavez Drive to Camino Del Luna, thereby adding a third NB and SB travel lane to the Rose Avenue/Cesar Chavez Drive intersection. As shown in Table 3-22, the intersection is forecast to operate in the LOS B range after widening is completed.

To mitigate the project-specific impact, the project would need to construct the intersection improvements at the Rose Avenue/Cesar Chavez Drive intersection. The addition of a third NB and SB travel lane would result in LOS B during the AM peak hour (V/C 0.68).

**TRAF-2: Camino Del Sol/Colonia Road Intersection (Project-Specific).** The intersection would operate at the cusp of LOS C/D under project-specific conditions. The intersection is controlled by an all-way stop. While existing plus project traffic volumes would satisfy *Warrant 3 – Peak Hour* contained in *Chapter 4C. Traffic Control Signal Needs Studies* of the CAMUTCD, the current CAMUTCD guidelines indicate that *Warrant 3 – Peak Hour* shall be applied “only in unusual cases, such as office complexes, manufacturing plants, industrial complexes, or high-occupancy vehicle facilities that attract or discharge large numbers of vehicles over a short time.”

It is recommended that the intersection be monitored through a yearly count program and signal warrant analysis as the high school attendance increases, to determine if a traffic signal is warranted under future conditions.

**TRAF-3: Camino Del Sol/Gibraltar Street Intersection (Project-Specific).** The Site analysis indicated that the eastbound left-turn lane should be extended to the maximum length available to accommodate the eastbound left-turn movement into the school main driveway (461 AM PHT). The peak queue was shown as 880 feet during the 25-minute AM peak period. Given that the spacing between Gibraltar Street and the Camino Del Sol Senior Apartments driveway to the west is approximately 950 feet, back to back left-turn lanes could be provided to adequately accommodate left-turns into the senior center and the high school.

**TRAF-4: Camino Del Sol/Colonia Road Intersection (Cumulative).** The intersection would operate at LOS E under cumulative conditions. As discussed in TRAF-2, the intersection is controlled by an all-way stop. While cumulative plus project traffic volumes would satisfy *Warrant 3 – Peak Hour* contained in *Chapter 4C. Traffic Control Signal Needs Studies* of the CAMUTCD, the current CAMUTCD guidelines indicate that *Warrant 3 – Peak Hour* shall be applied “only in unusual cases, such as office complexes, manufacturing plants, industrial complexes, or high-occupancy vehicle facilities that attract or discharge large numbers of vehicles over a short time.”

It is recommended that the intersection be monitored through a yearly count program and signal warrant analysis as the high school attendance increases, to determine if a traffic signal or is warranted under future conditions. The project's proportionate share to the cumulative traffic is 77 percent.

**TRAF-5: Camino Del Sol/Juanita Avenue and Camino Del Sol/Colonia Road Intersections (Buildout).** The cumulative analysis indicated that the project would generate a buildout impact based on City of Oxnard impact thresholds at the intersections of Camino Del Sol with Juanita Avenue and Colonia Road, which are all-way stop controlled. The project would not exceed the City's impact threshold of V/C 0.02 at the remaining intersections that would operate below LOS C.

Similarly, to TRAF-2 and TRAF-4, the currently stop controlled intersections could be signalized when conditions warrant. The programmed extension of Camino Del Sol to Oxnard Boulevard will result in traffic pattern changes, and intersection improvements as part of Camino Del Sol redesign should be evaluated through an ICE process to determine the appropriate improvements.

### 3.15.2.6 Level of Impact After Mitigation

Based on implementation of, and compliance with, Mitigation Measures TRAF-1, TRAF-2, TRAF-3, TRAF-4, and TRAF-5, the potentially significant impacts during the construction of the proposed project related to transportation would be reduced to less than significant.

## 3.16 UTILITIES AND SERVICE SYSTEMS

This section describes the proposed project's potential to affect the City of Oxnard utility and service systems, including water supply and associated conveyance infrastructure, wastewater conveyance and treatment infrastructure, storm drain infrastructure, electric power facilities, natural gas facilities, telecommunications facilities, and solid waste disposal systems. This section is partially based on the following Jensen Design and Survey, Inc. letter reports prepared in 2019: *Sewer Calculations*, *Water Demand Projections*, and *Maulhardt Property and Oxnard High School #8 Overall Hydrology Concept*; the Jensen Design and Survey, Inc. letter reports are provided in Appendix J.

As noted in the Initial Study (Appendix A), impacts associated with solid waste generation were found to have a less than significant impact and are not discussed in detail in the EIR.

### 3.16.1 Environmental Setting

#### 3.16.1.1 Existing Conditions

##### Water Supply

The summary of water supply provided in this subsection is based upon the *City of Oxnard 2015 Urban Water Management Plan* prepared by MNS Engineers, Inc. (2018), *Final State Water Project Delivery Capability Report* (2017), the Calleguas Municipal Water District *Urban Water Management Plan* (2016), and the *Water Demand Projections* prepared by Jensen Design and Survey, Inc.

**Supply Sources.** Three sources of water are used by the City: local groundwater supplied by City-owned groundwater wells (regulated by FCGMA), groundwater imported under contract with the UWCD, and surface water imported from CMWD. For the most part, City customers receive a blend of these supplies, of which the proportion changes based on the supplies available to the City. Although the ratio of blending operations varies, the City of Oxnard indicates that future blending will use a 1:1 (surface water to groundwater) ratio (MNS Engineers, Inc. 2018). The City of Oxnard produces recycled water at its AWPf, which is intended for use in the landscape irrigation of parks, schools, golf courses and common areas. Table 3-25 summarizes the projected sources of water for the City of Oxnard through 2040, based upon estimates included within the *City of Oxnard 2015 Urban Water Management Plan* (MNS Engineers, Inc. 2018).

**Table 3-25.** Summary of Existing and Projected Water Supplies (acre-feet)<sup>1</sup>

Water Supply	2015 <sup>2</sup>	2020	2025	2030	2035	2040
City Groundwater <sup>3</sup>	6,275	14,186	21,186	21,186	21,186	21,186
UWCD	7,344	7,329	7,329	7,329	7,329	7,329
CMWD	12,187	11,826	11,826	11,826	11,826	11,826
Recycled Water	605	7,000	14,000	14,000	14,000	14,000
<b>TOTAL</b>	<b>26,411</b>	<b>40,341</b>	<b>54,341</b>	<b>54,341</b>	<b>54,341</b>	<b>54,341</b>

Notes:

- 1 Source: *City of Oxnard 2015 Urban Water Management Plan*, MNS Engineers, Inc. 2018
- 2 2015 supplies represent actual consumption, not a limitation in water supply.
- 3 The Desalter treats groundwater, therefore is not included as a separate line item of Desalinated Water. Groundwater includes 7,186 AFY from well extraction plus recycled water supply from groundwater recharge, 7,000 AFY in 2020, 14,000 AFY effective 2025. Recycled Water includes the 8,525 AFY of ASR starting in 2025.



The following summarizes the City's various sources of supply and discusses associated environmental or reliability issues.

1. **Groundwater Supply.** The Oxnard Plain Pressure Groundwater Basin extends to approximately 2,000 feet bgs within the project Site. It is composed of a semi-perched aquifer and clay cap that is exposed at the ground surface, and that is underlain by an UAS and a LAS. Groundwater in the semi-perched aquifer is typically not used due to limited well yield and poor water quality. The UAS and LAS serve as the primary source of groundwater in the Oxnard region. Groundwater recharge of the Oxnard Plain Groundwater Basin primarily occurs through the Oxnard Forebay. The Oxnard Forebay is located in the upper most portion of the Oxnard Plain Groundwater Basin, where infiltration from the Santa Clarita River occurs (MNS Engineers, Inc. 2018). The City of Oxnard's active groundwater wells are located at the City Water Division Yard. Well numbers 22 and 23 are within the UAS and well numbers 20 and 21 are within the LAS, per the *East Village Phase III Annexation Draft Environmental Impact Report* (City of Oxnard 2012). Each system has a pumping rate of approximately 6,000gpm. The wells pump groundwater from the aquifer into a 220,000-gallon clear well reservoir (City of Oxnard 2012). Groundwater from three of the wells is treated using reverse osmosis (MNS Engineers, Inc. 2018).

In addition to the City's own groundwater allocation, it has a water supply contract with UWCD. UWCD diverts water from the Santa Clara River at the Vern Freeman Diversion Dam and delivers a portion of it to the Saticoy and El Rio Spreading Grounds as well as to agricultural users on the Oxnard Plain. Surface water percolated in these spreading basins recharges the Oxnard Forebay Basin and the Oxnard Plain Basin. The UWCD groundwater supplies which the City relies upon are regulated by the FCGMA. The FCGMA was created in 1982 to manage the main groundwater supply aquifers for the City, which are the Oxnard Plain and the Oxnard Forebay Basins, and to prevent seawater intrusion within these basins. The FCGMA promotes responsible groundwater management through the implementation of its Groundwater Management Plan, which was last updated in May 2007, and the SGMA, which requires each California groundwater basin to establish a GSA.

The FCGMA Groundwater Management Plan contains a variety of programs intended to further its goals of preserving the local groundwater basin resources, but two primary strategies are highlighted: a) aggressive development and use of recycled water, and b) reducing local groundwater pumping in areas that are difficult to recharge and are prone to localized over-pumping. The Groundwater Management Plan describes these stressed areas being supplied with alternative sources (e.g., recycled water, surface water, or groundwater obtained from areas easily recharged) and in turn, the conservation credits are transferred for use in and around the Oxnard Forebay Basin since it is easily recharged. The primary FCGMA regulatory tool is Ordinance 8.1, which (a) requires all groundwater wells to be registered with the agency, (b) requires all groundwater use to be reported to the agency, and (c) limits the amount of groundwater that may be pumped from within the agency's jurisdiction without the payment of a significant pumping surcharge (financial payment set at a rate roughly equivalent to the cost of purchasing a similar quantity of imported water) (City of Oxnard 2012).

Groundwater allocations are issued by the FCGMA to every municipal and industrial groundwater user within its jurisdiction, including the City of Oxnard. Allocations are monitored by the FCGMA. The recent drought has exacerbated the fragility of the Oxnard Plain Basin, and has resulted in reduced allocations to municipal pumpers, including the City of Oxnard. The completion of the Sustainable Groundwater Management Plan and Oxnard Basin Groundwater Sustainability Plan will address the long-term sustainability of the Oxnard Plain Basin for groundwater pumping.

Three plans are implemented to ensure reliable regional imported water supply: *Water Surplus and Drought Management Plan* (WSDM), *Water Supply Allocation Plan* (WSAP), and the *Emergency Storage Requirements Analysis*. The WSDM identifies the sequence of resource management actions that the MWD executes during surpluses and shortages. The WSAP provides a formula for allocating available water supplies to the member agencies in case of extreme water shortages. The *Emergency Storage*

*Requirements Analysis* defines the actions necessary for a catastrophic interruption in water supplies (MNS Engineers, Inc. 2018). The City's contract with the UWCD holds FCGMA allocations for the benefit of the City. Groundwater users may "bank" any unused groundwater allocation in the form of credits, which can subsequently be used to offset any pumping and surcharges in following years. During periods when imported supplies are restricted or when other operational considerations warrant it, the City relies more heavily on local groundwater, using a portion of its accumulated credits (City of Oxnard 2012). Similarly, if "foreign water" (including recycled water) is used in lieu of groundwater pumping and/or recharged into the local aquifers, additional credits (either conservation or storage) may be accrued. In April 2014, the FCGMA issued Emergency Ordinance E, which states that, "...conservation credits shall not be obtained and may not be used to avoid paying surcharges for extractions while this emergency ordinance is in effect." It also imposed additional pumping restrictions within the jurisdiction of the FCGMA, including an additional 10% on July 1, 2014, additional 5% on January 1, 2015, and additional 5% on July 1, 2015.

The FCGMA will grant the City additional groundwater allocations when it takes over water service responsibility for newly developed lands (e.g., conversion of agricultural lands to commercial, industrial, and/or residential uses). More specifically, Section 5.3.3 of the FCGMA Ordinance Code allows for the transfer of 2 AF per acre when agricultural lands are converted to municipal uses (2013). Pursuant to Section 5.4 of the FCGMA Ordinance Code, the conversion rate of 2 AFY is subject to a reduction of 25% in order to eliminate overdraft of the aquifer within the boundaries of the FCGMA.

The GREAT Program is the City of Oxnard's adopted and active long-range water supply strategy to combine wastewater recycling, groundwater injection, and groundwater desalination to make more efficient use of existing local water resources to meet projected water supply need of the City (City of Oxnard 2012). The GREAT Program includes the use of an AWP that currently treats 6.25 MGD of wastewater from the OWTP for non-potable (irrigation and industrial) uses and groundwater injection. Under this program, additional treatment facilities will be constructed to treat 12.5 MGD in the near term and 25 MGD in the longer term (City of Oxnard 2017). This water is supplied via the Recycled Water Backbone System, consisting of pipelines along Ventura Road (running north-south) and Hueneme Road (running east-west). The City sells this recycled water to agricultural users in exchange for groundwater allocations and injects it into the groundwater basin to create a barrier to seawater intrusion (City of Oxnard 2018a). The City is currently seeking approval of a demonstration indirect potable reuse project that will increase recycled water production to 7,000 AFY (City of Oxnard 2018a). These programs make more potable water available for other uses (drinking water, etc.) and will help the City meet its water supply demand (City of Oxnard 2018a).

2. **Imported Surface Water Supply.** The CMWD purchases water from the MWD of Southern California. The MWD imports water from two primary sources: the Colorado River and the State Water Project (SWP) operated by the California Department of Water Resources (DWR) (Black and Veatch 2016). The SWP is the largest state-built project in the country with the primary purpose of delivering water to 29 urban and agricultural water suppliers in Northern California, the San Francisco Bay Area, the San Joaquin Valley, the Central Coast, and Southern California, including 27 million urban users and 750,000 acres of farmland (CDWR 2019). MWD delivers water to CMWD via the West Valley Feeder, which is either stored in Lake Bard to be re-treated before distribution or is fed directly to the Springville Reservoir near Camarillo.

CMWD's 2015 UWMP states that the City of Oxnard accounted for 12.8% of water deliveries; it is projected that sufficient water supplies will be available for the years 2020 through 2040 in normal years, single dry years, and multiple dry years. These projections include the use of recycled water (Black and Veatch 2016).

The *Final State Water Project Delivery Capability Report 2017* (2018) states the key factors affecting the operation of the SWP, its long-term reliability as a source of water, and an estimate of its current delivery capability (CDWR 2018). MWD receives a maximum annual amount of 1,911,500 AF of "Table A" water from the SWP. Table A water is that basis for apportioning water supply and costs to the SWP contractors. Once the total amount of water to be delivered is determined for the year, all available water is allocated in proportion to each contractor's annual maximum SWP Table A amount. The SWP *Final State Water Project*

*Delivery Capability Report 2017* (2018) indicates that the SWP could deliver 62% of Table A allocations on a long-term average (1921-2003) basis; however, in a single dry-year (worst-case scenario) DWR estimated delivery of an average of only 11% of Table A allocations. In a four-year drought scenario, DWR estimated delivery of an average of 34% of Table A allocations (CDWR 2018). Due to the recent drought conditions in California, in 2015, MWDs annual SWP allocation was just 20 percent, following a 5 percent allocation in 2014. In addition, total system storage within MWD's other supply source, the Colorado River, has been reduced to about 50 percent capacity following 15 exceedingly dry years in the Southwest (Black and Veatch 2016).

## Wastewater Systems

The City of Oxnard provides wastewater collection and treatment services through the Public Works Wastewater Division. The OWTP, located in southwest Oxnard, serves the cities of Oxnard and Port Hueneme, Naval Base, Ventura County and Point Mugu, and some adjacent unincorporated areas. The City owns, operates, and maintains over 400 miles of sewer pipeline and 15 wastewater lift stations. Three additional pumping stations owned and operated by other entities also discharge to the City's system (City of Oxnard 2017a). Additionally, the City of Oxnard implements the GREAT Program, which includes the use of an AWP that currently treats 6.25 MGD of wastewater from the OWTP for non-potable (irrigation and industrial) uses and groundwater injection (City of Oxnard 2017).

## Stormwater Systems

The project Site is located within the Santa Clara River floodplain and according to the VCWPD's *Rice Road Drain Design Hydrology Update Draft Report* (2016), the project lies within the RRD watershed. The RRD watershed is approximately 3,250-acres and is located primarily within the Oxnard City limits, although a portion is also within unincorporated Ventura County agricultural areas. The RRD watershed drains most of the west side of Oxnard. According to the *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, the RRD watershed is located within the larger *Miscellaneous Ventura Coastal Watershed Management Area* (WMA) that is composed of four separate coastal watersheds located between the western Los Angeles Region (Region 4) boundary, Ventura River, Santa Clara River, and Calleguas Creek Watersheds, as well as the Santa Monica Bay WMA (Los Angeles RWQCB 2014) (Basin Plan). The Basin Plan also states that the drainage areas within the WMA are typified by either small coastal streams, wetlands, or marinas/urban centers in areas that historically consisted of extensive wetlands.

The project area does not contain any streams, wetlands, or other waters under jurisdiction of the USACE, RWQCB, or the CDFW. According to the *Preliminary Drainage Report Northeast Community* (Jensen Design & Survey, Inc. 2018a), storm water runoff from the Site currently flows to a series of agricultural drainage ditches and eventually to Camino del Sol, which borders the project to the south. From Camino del Sol, runoff discharges to Rice Road Drain, which begins on the south side Camino del Sol and flows south. The *Rice Road Drain Design Hydrology Update Draft Report* states that flow rates into the Rice Road Drain can be no greater than one cfs/ac due to a 1987 agreement between the VCWPD and the City of Oxnard limiting the 100-year outflow from subareas located north of Fifth Street (VCWPD 2016). The report also states that numerous detention basins have been installed within the drainage area to Rice Road Drain in compliance with the agreement.

The VCWPD's public GIS maps show that Rice Road Drain continues to run south to Pleasant Valley Road, then turns southwest paralleling Pleasant Valley Road until terminating at (and discharging into) Oxnard Industrial Drain, which discharges to an open channel that flows to a slough adjacent to Ormond Beach at the Pacific Ocean (County of Ventura 2019). The City of Oxnard's storm water drainage features are maintained by the City of Oxnard Public Works Department Operations Division and VCWPD, and consist of gutters, catch basins, manholes, underground pipes, roadside ditches, and channels, all of which drain directly to the Pacific Ocean. Major drainage channels within Oxnard include Doris Avenue Drain, Wooley Road Drain, Fifth Street Drain, Oxnard West Drain, Oxnard

Industrial Drain, “J” Street Drain, Rice Road Drain, El Rio Drain, Camarillo Drain, and Nyeland Drain (Carollo Engineers 2015).

### **Electric Power**

Southern California Edison is the electricity provider for the City of Oxnard (City of Oxnard 2019h).

### **Natural Gas**

The Southern California Gas Company (Sempra Energy) is the gas service provider for the City of Oxnard (City of Oxnard 2019h).

### **Telecommunications**

The City of Oxnard has 18 internet providers with six of those offering residential service. Charter Spectrum is the most widely available choice for Oxnard residents, and is accessible for 99 percent of Oxnard. Frontier Communications is also a common option in the area, serving 94 percent of Oxnard with digital subscriber lines (DSL) service. Satellite Internet can be serviced in nearly one hundred percent of Oxnard. Brands such as Metro® by T-Mobile and Sprint Mobile advertise long term evolution (LTE) plans in parts of Oxnard. Additionally, there are 10 providers in the area offering enterprise and small to medium size business subscriptions such as point-to-point connectivity or custom fiber loops (BroadBandNow 2019).

## **3.16.1.2 Regulatory Setting**

### **Federal**

#### ***Federal Clean Water Act***

The federal CWA establishes regulatory requirements for the raw and treated water quality used as potable water supplies. The City of Oxnard is required to monitor water quality and conform to the regulatory requirements of the CWA.

#### ***Federal Safe Drinking Water Act***

The federal Safe Drinking Water Act (SDWA) establishes standards for contaminants in drinking water supplies. Maximum contaminant levels and treatment techniques are established for each of the contaminants, which include metals, nitrates, asbestos, total dissolved solids, and microbes.

### **State**

#### ***California SDWA***

California’s SDWA was enacted in 1976. The SWRCB, Division of Drinking Water (DDW) has been granted primary enforcement responsibility for the SDWA. Title 22 of the California Administrative Code stipulates drinking water quality and monitoring standards; standards are equal to or more stringent than federal standards.

#### ***California Executive Orders and Resolutions***

In January 2014, Governor Brown issued Proclamation No. 1-17-2014 declaring a drought State of Emergency to exist in California due to severe drought conditions presenting urgent problems to drinking water supplies, cultivation of crops, and threatening the survival of animals and plants that rely on California’s water resources. In response to the January 2014 Proclamation, the SWRCB adopted in July 2014, Resolution 2014-0038, which defined water conservation regulations including prohibitions for all water users and required actions for all water agencies. On April 1, 2015, Governor Brown issued Executive Order B-29-15, which ordered the SWRCB to impose restrictions to achieve a statewide 25% reduction in potable urban water usage through February 28, 2016, relative to a baseline of 2013 water use (State of California, Executive Order B-29-15, April 2015). In response to Executive Order B-29-15, the SWRCB adopted Resolution No. 2015-0032 and a regulation pursuant to Water Code section 1058.5 that, among other things, required a mandatory 25% statewide reduction in potable urban water use between June 2015

and February 2016. Under the adopted regulation, the City of Oxnard was required to cut its water usage by 12%. Due to higher than average rainfall in California during the 2017 water year, Governor Brown issued Executive Order B-40-17 on April 7, 2017. Executive Order B-40-17 directed the SWRCB to rescind portions of its existing emergency regulations that require a water supply stress test or mandatory conservation standard for urban water agencies, to continue development of permanent prohibitions on wasteful water use, permanent requirements for reporting water use by urban water agencies, and to continue the portions of the emergency regulations that prohibit certain wasteful water practices and require water use reporting as a bridge until permanent requirements are in place.

#### ***California Water Code - Urban Water Management Planning Act***

Pursuant to the Urban Water Management Planning Act (California Water Code §§ 10610 - 10656) urban water suppliers having more than 3,000 service connections or water use of more than 3,000 AFY for retail or wholesale uses are required to submit an Urban Water Management Plan (UWMP) every five years to the CDWR. UWMPs are prepared to support long-term resource planning and to ensure that reliable and adequate water supplies are available to meet existing and future demands over a 20-year planning horizon during normal, single-dry and multiple-dry year periods.

#### ***California Water Conservation Act***

The Water Conservation Act of 2009 (often referred to as SBX7-7) requires increased emphasis on water demand management and requires the state to achieve a 20% reduction in urban per capita water use by December 31, 2020. Retail urban water suppliers are required to report baseline and compliance data in their UWMPs in accordance with the requirements of SBX7-7. The City of Oxnard adopted its current UWMP in 2015.

#### ***California Public Utilities Code***

Public utilities are under the jurisdiction of the California Public Utilities Commission. According to California Public Utilities Code, Section 451, public utilities have an obligation to serve the public and are required by law to “furnish and maintain...service as necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.” As a result, utility providers are required by law to provide service to any member of the public living within the utility’s service area who has applied for service, is willing to pay for the service, and will comply with the applicable rules and regulations.

### **Local**

#### ***City of Oxnard Water Neutrality Policy***

On January 15, 2008, the City of Oxnard adopted a policy that ensures mitigation measures are imposed as part of approval of new development, so that the associated demand remains consistent with available supplies (the Water Neutrality Policy). The net result of this policy is that project approvals include conditions that: a) control the pace of construction of any given project (and thus the pace at which water demand increases); b) allow participation in the contribution toward the development of additional water supplies that offsets the demand associated with the project; or c) suspend project approval until sufficient supplies are available to support the anticipated project demand. The Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. New development includes all planned (anticipated in the 2030 General Plan) and any unplanned future development. Under the policy, a development can be water neutral by meeting its projected demand through one or more of the following:

- Transfer of existing FCGMA groundwater allocations to the City;
- Contributing to increased efficiency by funding City water conservation programs;
- Funding recycled water retrofit projects; or
- Providing additional water supplies.



### ***City of Oxnard Municipal Code***

The City of Oxnard Municipal Code, Articles VIII, *Water Waste*, and IX, *Water Conservation and Water Shortage Response Procedures*, contains permanent water conservation standards to maximize water use efficiency for non-shortage conditions and provide response actions implemented during water shortage conditions. Pursuant to the Oxnard Municipal Code, during a declared water shortage condition the water sources available to the City will be put to the maximum beneficial use to the greatest extent possible. The primary purpose of Article IX of the Oxnard Municipal Code is to provide response actions for use during water shortages, including procedures that will significantly reduce the consumption of City water over an extended period of time. The aim is to extend the water available to City residents while reducing the hardship on the City and the general public to the greatest extent possible. Pursuant to Article IX of the Oxnard Municipal Code, upon determining the severity of the water shortage emergency, the City Council will establish, by resolution, water conservation goals by stages. Immediately after adoption of a City Council resolution declaring the water conservation goals, water allocations will be in effect and customers will be prohibited from using water in excess of their allocation. Each customer will be solely responsible for managing his/her water uses in such a manner as to not exceed the amount of water allocated. Percentage reduction stages and goals will be in effect with the first full billing period commencing on or after the effective date of the City Council resolution adopting a water shortage plan. During a water shortage emergency, the City Manager will take specific actions in response to the failure of any customer to comply with established water use restrictions.

### ***FCGMA Groundwater Management***

The FCGMA established a series of water management policies and programs that are intended to protect the long-term integrity and reliability of the local groundwater resources within its jurisdiction. Ordinance 8.1. is FCGMA's primary regulatory tool for achieving its goals but has also adopted several resolutions. The FCGMA's primary groundwater preservation program is embodied in its comprehensive ordinance code, requiring: a) all groundwater wells to be registered with the agency, b) all groundwater use to be reported to the agency, and c) limits on the amount of groundwater that may be pumped from within the agency's jurisdiction without the payment of a pumping surcharge. Emergency Ordinance E requires additional pumping restrictions within the FCGMA boundary and currently restricts the use of groundwater conservation credits.

### ***City of Oxnard 2030 General Plan***

The relevant goals and policies applicable to new schools within the City, water supply, stormwater drainage, gas and electric utilities, and water resources as described in Chapter 4 of the City of Oxnard 2030 General Plan (2011) are described as follows.

## **Chapter 4 Infrastructure and Community Services**

- ICS-1.2      Development Impacts to Existing Infrastructure:** Review development proposals for their impacts on infrastructure (e.g., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.
- Goal ICS-11**      Water supply, quality, distribution, and storage adequate for existing and future development.
- ICS-11.6      Water Conservation and/or Recycling Connection as Mitigation:** Require the use of water conservation offset measures (efficient low flow fixtures and irrigation systems, drought tolerant landscaping, leak detection programs, water audits, and public awareness and education programs) and/or proportional contributions to recycled water production and/or conveyance infrastructure related to the GREAT Program as mitigation for water supply shortage as determined by a Water Supply Assessment, CEQA documentation, or similar analysis as part of new or master plan development review.

- ICS-11.7 Water Wise Landscapes:** Promote water conservation in landscaping for public facilities and streetscapes, residential, commercial and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new and replacement landscaping.
- ICS-11.10 Water Supply Finding for Smaller Projects:** Prior to approval of a discretionary proposed project not subject to a Water Supply Assessment pursuant to Government Code Section 66473.7, a finding shall be made to ensure an adequate water supply for the proposed development.
- ICS-11.12 Water for Irrigation:** Require the use of non-potable water supplies for irrigation of landscape and agriculture, whenever available.
- ICS-11.13 Water Neutral Policy and Urban Water Management Plans:** Incorporate the City's Water Neutral Policy regarding new development into the 2010 Urban Water Management Plan and develop appropriate ordinances, policies, and/or programs to fully implement the policy.
- Goal ICS-12** Adequate capacity at the City Waste Water Treatment Plant to accommodate existing and future development.
- ICS-12.3 Wastewater Discharge Monitoring:** Monitor and ensure that discharges comply with approved permits.
- ICS-12.5 Sedimentation Control:** Require by conditions of approval that silt and sediment from construction be either minimized or prohibited.
- ICS-12.6 Timing of Future Development:** Impose conditions in order to ensure adequate wastewater capacity for proposed new development.
- Goal ICS-13** Adequately sized storm drain systems and discharge treatment, certified levees, and implementation of appropriate NPDES permits and regulations.
- ICS-13.2 Adequate Storm Drains and NPDES Discharge Treatment:** Provide storm drainage facilities with sufficient capacity to protect the public and property from the appropriate storm event and strive to meet storm water quality discharge targets set by NPDES and related regulations.
- ICS-13.3 Stormwater Detention Basins:** Design stormwater detention basins to ensure public safety, to be either visually attractive or unobtrusive, provide temporary or permanent wildlife habitats, and recreational uses where feasible in light of safety concerns.
- ICS-13.4 Low Impact Development:** Incorporate LID alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education.
- Goal ICS-17** Adequate and efficient public utilities that meet the needs of residents of the City.
- ICS-17.1 Electric Facilities:** Ensure that public and private, replacement and/or refurbished, electric generation and/or transmission facilities are built in accordance with the California Coastal Commission Sea Level Rise Policy Guidance, California Public Utilities Commission and/or California Energy Commission policies and regulations and incorporate feasible solar, wind, and other renewable sources of energy.
- ICS-17.3 Promoting Renewable Energy Production:** Encourage the use of renewable solar, wind, and other electric generation technologies instead of new or expansion of fossil fuel-based generation facilities.

- ICS-17.4 Service Extension:** Coordinate with gas and electricity providers for the extension of gas and electrical facilities.
- ICS-17.5 Undergrounding of Utility Lines:** Require undergrounding of utility lines in new development, except where it is not feasible due to electrical transmission load or other operational issues.

### 3.16.2 Impact Analysis

#### 3.16.2.1 Methodology

Project impacts to utilities and service systems were evaluated based on information about water supply and associated conveyance infrastructure; wastewater conveyance and treatment infrastructure; and storm drain infrastructure, described within the following Jensen Design and Survey, Inc. letter reports prepared in 2019: *Sewer Calculations*, *Water Demand Projections*, and *Maulhardt Property and Oxnard High School #8 Overall Hydrology Concept*. The Jensen Design and Survey, Inc. letter reports are provided in Appendix J. Additional information based on direct statements and clarifications provided by Jensen Design and Survey, Inc. in August 2019, have also been incorporated.

#### 3.16.2.2 Significance Thresholds

The thresholds for utility and service system impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*
- *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

#### 3.16.2.3 Project Impacts

***Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Jensen Design & Survey, Inc. developed a *Preliminary Water Demand Memorandum* (2018) that calculated the water demand for the high school to be 2.3 AFY/acre (estimated from the *Teal Club Specific Plan EIR*, City of Oxnard 2015, per the Jensen Survey & Design, Inc. memorandum), which would result in 114.43 AFY. The memorandum states that demand estimated from the average water bills for Oxnard and Channel Island High Schools (including irrigation) was 67 AFY; the memorandum also states the rounded estimate from Hensley High School Architects, which was 56 AFY. The City of Oxnard *2030 Master Plan* uses a demand of 1,500 gallons (0.0046 AF) per day per acre as the planning level consumption for school sites, based on the average water consumption of school sites located in the City of Oxnard and increased to account for future fluctuations, which extrapolates to 78 AFY.

The proposed project's estimated water demand is approximately 67 AFY (Jensen Design and Survey, Inc. 2019b). The 100-acre Maulhardt Property was annexed into the City of Oxnard and the MWD in 2014. Per Jensen's *Projected Water Demands Letter* to Tetra Tech (2019), although the City of Oxnard's *Urban Water Master Plan* includes the Maulhardt Property and the Site was allocated 161 AFY of groundwater within the annexation, it does

not specify specific projected water usage for the Site and therefore, Jensen Design & Survey, Inc. cannot determine at this time whether the supply is sufficient to meet the estimated demand of 67.0 AFY (2019). However, if it is assumed that the calculation for water demand for the high school is correct (2.3 AFY/acre [estimated from the *Teal Club Specific Plan EIR*, City of Oxnard 2015, per the Jensen Survey & Design, Inc. memorandum]), which would result in 114.43 AFY as the total demand for the high school, and 161 AFY is the allotted supply, the proposed project's water demand will not exceed the estimated supply. CMWD's 2015 UWMP states that the City of Oxnard accounted for 12.8% of water deliveries; it is projected that sufficient water supplies will be available for the years 2020 through 2040 in normal years, single dry years, and multiple dry years to account for the proposed project, in addition to the City's existing planned future uses. These projections include the use of recycled water (Black and Veatch 2016). Furthermore, the City of Oxnard imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City of Oxnard Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The water fees associated with the proposed project would be paid upon issuance of a building permit (East Village EIR 2012). Thus, with the implementation of Mitigation Measure HYDRO-2, the proposed project's impacts on water supply and facilities would be less than significant.

Allowable stormwater discharge rates for the Maulhardt Property stem from the 1987 Rice Road Watershed Agreement between the City of Oxnard and the VCWPD. At the time of developing this Draft EIR, the precise routing of the storm water drainage features, discharge location to Rice Road Drain, and size of on-Site detention basins had not been finalized; however, the proposed project will be held to the 1 cfs/ac discharge rate, consistent with the 1987 Rice Road Watershed Agreement (Jensen Design and Survey, Inc. 2019a). Proposed features include pre-treatment of runoff from the North and South Campuses with *Downstream Defender* hydrodynamic separators. The treated water would then flow into ADS Stormtech plastic chambers that will be installed under the basketball court area (North Campus) and the parking lot (South Campus). The North Campus will also have an infiltration system under the varsity softball field. Allowable discharges will bypass the ADS Stormtech system, but larger flows will be diverted into the infiltration system to meet City of Oxnard detention requirements. A portion of the runoff from the streets that will be constructed and dedicated to the City of Oxnard and surrounding the Site will be mitigated by upsizing the North and South Campus detention systems to retain this additional volume of runoff. The proposed project area has been accounted for in the design and construction of the City RCB systems (Charles Hilsmann 1992; William J. Ghormley Consulting 1989; DH Civil Engineering, Inc. 1999). Through a combination of these stormwater control measures, project impacts on stormwater drainage facilities would be less than significant.

The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient LED lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The Site parking lot and pathway pole-mounted lighting and sports field lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the project will be an energy-efficient type complying with the most recent energy code. The high school will connect to an 8" Southern California Gas main line in Camino del Sol. The point of connection will be just west of the proposed driveway at Gibraltar Street (Figure 2-3). Natural gas uses will include water heaters, gas turrets in the Science building, kitchen equipment, pool boiler, and heating units. The project is planned to connect to existing utility lines and local telecommunication providers and is not anticipated to require the construction or relocation of electric power, natural gas, or telecommunication facilities. The proposed project area is an infill Site and will make any required upgrades to connect to existing utility lines and providers. The 2030 General Plan accounted for urban development of the Site, and utility providers within the City are included on the distribution list for the environmental documents pertaining to the proposed project (including the IS). Therefore, project impact would be less than significant.

***Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

The proposed project's estimated water demand is approximately 67 AFY (Jensen Design and Survey, Inc. 2019b). The 100-acre Maulhardt Property was annexed into the City of Oxnard and the MWD in 2014. Per Jensen's *Projected Water Demands Letter* to Tetra Tech (2019), although the City of Oxnard's *Urban Water Master Plan* includes the Maulhardt Property and the Site was allocated 161 AFY of groundwater within the annexation, it does not specify specific projected water usage for the Site and therefore, Jensen Design & Survey, Inc. cannot determine at this time whether the supply is sufficient to meet the estimated demand of 67 AFY (2019). However, if it is assumed that the calculation for water demand for the high school is correct (2.3 AFY/acre [estimated from the *Teal Club Specific Plan EIR*, City of Oxnard 2015, per the Jensen Survey & Design, Inc. memorandum]), which would result in 114.43 AFY as the total demand for the high school, and 161 AFY is the allotted supply, the proposed project's water demand will not exceed the estimated supply. CMWD's 2015 UWMP states that the City of Oxnard accounted for 12.8% of water deliveries; it is projected that sufficient water supplies will be available for the years 2020 through 2040 in normal years, single dry years, and multiple dry years to account for the proposed project, in addition to the City's existing planned future uses. These projections include the use of recycled water (Black and Veatch 2016). The MWD completed a reliability analysis for its 2015 UWMP. After projecting demands for single dry year, multiple dry years, and average years, the MWD's water reliability analysis indicates that the region can provide reliable water supplies under both the single driest year and the multiple dry-year hydrologies. From 2020 through 2040, demand can be met utilizing groundwater and SWP supplies. The key component of MWD's supply capability is the amount of water in its large regional storage portfolio that includes both dry-year and emergency storage capacity (MNS Engineers, Inc. 2018). Furthermore, the City of Oxnard imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City of Oxnard Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The water fees associated with the proposed project would be paid upon issuance of a building permit (East Village EIR 2012). Thus, with the implementation of Mitigation Measure HYDRO-2, the proposed project's water demand will not exceed the estimated supply, and impacts on water supply would be less than significant.

***Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

The high school campus would generate domestic wastewater from various sources, such as restrooms and food service facilities, and it would be treated by the OWTP. It is anticipated the high school will produce an average sewage flow rate of 0.093 cfs, and a peak sewage flow rate of 0.2839 cfs (Jensen Design and Survey, Inc. 2019c). The OWTP has a current capacity of 31.7 MGD with average daily flows of approximately 24.0 MGD. The City anticipates expansion of the plant to 39.7 MGD by 2020.

At the time of developing this Draft EIR, the precise downstream options for the high school sewer system had not been finalized, however, domestic wastewater generated at Oxnard High School No. 8 Site would discharge entirely to the Camino del Sol sewer. The anticipated sewer flow rates for the high school will be analyzed using the City's sewer model, which will determine the sewer design of the project and any necessary downstream upgrades (Jensen Design and Survey, Inc. 2019c) needed to provide adequate service to the project Site. Therefore, the potential project impacts on existing wastewater treatment facilities and sewer systems will be designed to meet City requirements. As part of standard development procedures, Site plans would be submitted for review and approval to ensure adequate wastewater capacity prior to construction. Therefore, with the implementation of UTIL-1 and compliance with existing requirements, project impact would be less than significant.



### 3.16.2.4 Cumulative Impacts

The General Plan and the NECSP consider probable future projects, each of which would have to undergo the CEQA process individually. The buildout of the remaining portions of the Maulhardt Property that do not encompass the proposed project area must consider the demand of the proposed project within the CEQA process. The City of Oxnard UWMP is based on 2030 General Plan buildout, and therefore addresses cumulative impacts in nature. Additionally, the proposed project and all future development projects in the City will be required to comply with standard water conservation requirements of the City, State, and California Building Code. These include the use of low-flush toilets and urinals, compliance with statewide efficiency standards for shower heads and faucets, and insulation of pipes to reduce water used before hot water reaches equipment or fixtures. Given the project's plan for water neutrality, as required by the City, the increase of demand in City water supply will be mitigated. Storm water drainage, electric power, natural gas, and telecommunications facilities are proposed to connect to already existing systems and service providers. The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient LED lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The Site parking lot and pathway pole-mounted lighting and sports field lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the project will be an energy-efficient type complying with the most recent energy code. Cumulative impacts of the proposed project on Utilities and Service Systems will be less than significant.

### 3.16.2.5 Mitigation Measures

**UTIL-1:** OUHSD shall submit the anticipated sewer flow rates for the high school to the City so that it can be analyzed using the City's sewer model. Based on the results, OUHSD shall coordinate with the City regarding the final sewer design including any required improvements needed to provide adequate sewer service to the project Site.

### 3.16.2.6 Level of Impact After Mitigation

With the implementation of Mitigation Measures UTIL-1 and HYDRO-2, potential project impacts would be reduced to less than significant.

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## 4.0 OTHER CEQA CONSIDERATIONS

### 4.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGE

According to the CEQA Guidelines, “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.” Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that can’t be avoided.

Both construction and operation of the proposed project would lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The new high school would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project Site. Consumption of these resources would occur with any development in the region and is not unique to the proposed project. It is not anticipated that the development of the project would significantly affect local or regional resource supplies.

Implementation of the proposed project includes roadway improvements to Rose Avenue that would require removing the mature existing windrow trees found on the east side of Rose Avenue as shown in Figures 3-1 and 3-2. City of Oxnard 2030 General Plan Goals and Policies include the protecting and enhancing scenic resources including windrows. As identified in Section 3.1 of this EIR, removal of these trees would result in the loss of a significant scenic resource, resulting in a significant impact. No feasible mitigation measures are available to adequately offset the loss of the windrow trees and this would remain a significant and unavoidable impact.

Implementation of the proposed project would result in the conversion of agricultural land into educational uses, resulting in a permanent loss of 49.75 acres of Farmland of Statewide Importance. As identified in Section 3.2 of this EIR, the City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) accounted for the conversion of up to 2,215 acres of important farmland (defined as Prime Farmland and Farmland of Statewide Importance) including the project Site to non-agricultural use and determined the impact to be significant and unavoidable. The entire Maulhardt Property was identified as either Prime Farmland or Farmland of Statewide Importance in the City of Oxnard 2030 General Plan Program EIR (Figure 5-1, Important Farmland Impacts). No feasible mitigation measures were available to reduce the impact to a less than significant level (City of Oxnard 2009).

The additional vehicle trips associated with the proposed project would incrementally increase local traffic, noise levels and regional air pollutant emissions. With the implementation of mitigation measures, impacts associated with increase local traffic, noise levels and regional air pollutant emissions would be less than significant.

As discussed in Section 3.5, Cultural and Tribal Cultural Resources, the proposed project has the potential to impact unknown sensitive cultural and tribal cultural resources on the project Site. With the implementation of mitigation measures, impacts associated with cultural and tribal cultural resources would be less than significant.

Title 24 of the California Administrative Code regulates the amount of energy consumed by new development. Nevertheless, the consumption of such resources would represent a long-term commitment of those resources. The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth and planned changes on the project Site and within the general vicinity to accommodate existing and projected future student enrollment within the District.

## 4.2 GROWTH-INDUCING IMPACTS

Pursuant to the CEQA Guidelines (Section 15126.2(d)): an EIR must address whether a project will directly or indirectly foster growth as follows: “[An EIR shall] discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of wastewater treatment plant, might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also, discuss the characteristic of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

As discussed below, this analysis evaluates whether the proposed project would directly or indirectly induce economic, population, or housing growth in the surrounding environment.

### **Direct Growth-Inducing Impacts in the Surrounding Environment**

Direct growth-inducing impacts occur when the development of a project induces population growth or the construction of additional developments in the same area of a proposed project and produces related growth-associated impacts. Growth-inducing projects remove physical obstacles to population growth, such as the construction of a new road into an undeveloped area, a wastewater treatment plant expansion, and projects that allow new development in the service area. Construction of such infrastructure projects are considered in relation to the potential development and the potential environmental impacts.

The proposed project would not directly induce growth as it does not involve residential development. School uses are considered growth accommodating uses, instead of growth-inducing, as new schools are typically built in order to serve the educational needs of the existing and forecast populations. The proposed new neighborhood high school facilities are needed to accommodate existing and anticipated future enrollment in the District. The recreational facilities associated with the CCA will provide the community with additional recreation opportunities after school hours. In addition, the proposed project would not remove obstacles to regional growth and related development. Therefore, no significant impacts related to direct growth inducement would occur.

### **Indirect Growth-Inducing Impacts in the Surrounding Environment**

The proposed project would not indirectly induce growth through substantial increase in employment opportunities or an employment-related increase in population. Construction workers for the proposed project are expected to be drawn from the local labor pool. During operation, the proposed project would have approximately 150 employees. Although it is expected that most of these opportunities would be filled by residents of communities adjacent to the project Site, the proposed project could indirectly result in a minimal growth in population of the immediate area. This minimal growth would not represent unplanned population growth in the community or result in economic growth that exceeds levels anticipated in plans adopted by the City. Therefore, no significant impacts related to indirect growth inducement would occur.

## 4.3 SIGNIFICANT UNAVOIDABLE IMPACTS

This EIR evaluates the potential environmental impacts of the proposed project and identifies mitigation measures that would avoid, reduce or minimize impacts when feasible. For almost all of the significance criteria, potential impacts would be mitigated to less than significant. However, the proposed project would result in significant unavoidable impacts in the following two areas:

### **Windrow Trees**

The proposed project includes roadway improvements to Rose Avenue that would require removing the mature existing windrow trees found on the east side of Rose Avenue. City of Oxnard 2030 General Plan Goals and Policies

include the protecting and enhancing scenic resources including windrows. Removal of these trees would result in the loss of a significant scenic resource, resulting in a significant impact. Implementation of Mitigation Measure AES-1 proposed in Section 3.1 reflects the East Village Phase III Annexation EIR and the Northeast Community Specific Plan guidelines designed to minimize this impact. This would include use of mature existing trees where feasible and replacement criteria when existing mature tree removal is necessary. While this mitigation measure will reduce the impact, the loss of the windrow trees would remain a significant and unavoidable impact.

**Agriculture (Converting Farmland of Statewide Importance to Non-Agricultural Use)**

OUHSD proposes to change the NECSP designations for the project Site to School use. The District is coordinating with the City relative to conformance of its Site use with the existing General Plan and zoning ordinances. Even though the land use is proposed for a change to accommodate the high school, the buildout of the Site with non-agricultural uses was previously accounted for in the 2030 General Plan and identified in the East Village Phase III Annexation EIR. While the proposed project would be a different development scenario than previously evaluated, it would nonetheless also convert the Site to non-agricultural use. No new or increased impact related to conversion of important farmland would result given the location of the project Site within a developed urban environment. Mitigation Measure AG-1 is provided as a partial mitigation measure for the loss of important farmland. Nonetheless, conversion of agricultural land at the project level would remain a significant and unavoidable impact.



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## 5.0 ALTERNATIVES

### 5.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS FOR ALTERNATIVE ANALYSIS

This section discusses the alternatives to the proposed project that would potentially avoid or lessen the significant environmental impacts while obtaining most of the basic Project Objectives. Sufficient information about each alternative is included to allow meaningful evaluation, analysis, and comparison with the project. Per Section 15126.6(d) of the CEQA Guidelines, potential significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines (14 CCR) provide guidance on the alternatives to a project that must be evaluated in an EIR. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (*California Public Resources Code*, Section 21002.1), the discussion of alternatives must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

An EIR must describe a range of reasonable and of potentially feasible alternatives to the project, or to the location of the project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. The comparative merits of the alternatives must be evaluated.

An EIR need not consider every conceivable alternative, but it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a “rule of reason” that requires discussion of only those alternatives necessary for the OUHSD (Lead Agency) to make a reasoned choice.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR:

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (15126.6[b]).
- The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as (15126.6[d]).
- The specific alternative of “no project” shall also be evaluated along with its impact (15126.6[e][1]). The “no project” analysis shall discuss the existing conditions at the time the NOP is published, or if no NOP is published, at the time environmental analysis is commenced, as well as what would be reasonably expected

to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).

- The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making (15126.6[f]).
- For alternative locations, “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR (15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6 [f][3]).

Pursuant to the CEQA Guidelines previously summarized, a reasonable range of alternatives to the project was considered and evaluated in this Draft EIR.

## 5.2 PROJECT OBJECTIVES

The objectives of the proposed project include the following:

- Accommodate existing and projected future student enrollment within the District;
- Provide new facilities that meet the District’s educational specifications;
- Provide a new neighborhood high school to accommodate 2,500 students in permanent classroom facilities;
- Build and maintain school facilities that reflect the wise and efficient use of limited land resources; and
- Provide for new community appropriate recreational facilities.

## 5.3 SUMMARY OF THE PROJECT AND SIGNIFICANT IMPACTS

### 5.3.1 Summary of Project

The OUHSD proposes to construct and operate a new neighborhood high school to accommodate existing and anticipated future enrollment in the District. The new school facilities are designed to meet the educational and recreational needs of up 2,500 students in grades 9-12. In total, the proposed project would comprise approximately 281,311 square feet of building and structures and provide approximately 722 parking spaces on Site. The proposed project includes a variety of recreational features including a pool, stadium, and various fields and courts. A Civic Center Act (CCA) is proposed for community use to provide additional recreation opportunities after school hours. Facilities proposed for community use under the CCA include practice fields, JV baseball and softball fields, pool, basketball courts, tennis courts, performing arts center, and parking.

### 5.3.2 Alternatives Considered and Rejected

Section 15126.6(c) of the *CEQA Guidelines* suggests that an EIR identify alternatives that were considered for analysis but rejected as infeasible, then briefly explain the reasons for their rejection.

According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

OUHSD successfully passed the Measure A school facilities bond in June 2018, that will provide \$350 million of funding for district-wide facilities improvements and a new Oxnard-area high school to relieve overcrowding throughout the District. OUHSD studied several potential high school sites and other alternatives and determined that the proposed project Site to be the one that is best available. Other sites considered included the Teal Club Site, Cooluris Site, Rice-Wooley Site, Hueneme-Olds Site, Cooluris Site New, and Harbor Site. Factors that reduced the alternative sites feasibility or ability to avoid significant environmental impacts included: potential for tsunami inundation, roadway traffic, few students within walking distance, overhead electrical lines, high pressure gas lines, mainline railroad tracks, and proximity to an industrial area. These alternatives would not meet two of the project objectives of: providing new facilities that meet the District's educational specifications; and building school facilities that reflect the wise and efficient use of limited land resources. Therefore, alternative site locations were considered but rejected.

### 5.3.3 Alternatives to the Proposed Project

Alternatives considered in this EIR include:

- No Project Alternative – This alternative assumes that improvements described for the proposed project would not be implemented. OUHSD would not implement any changes to the project Site that would result in changes to existing project Site or existing agricultural uses. Under the No Project Alternative, it is assumed that increases in enrollment would have to be accommodated by existing OUHSD high schools.
- Limited Expansion of Existing High Schools Alternative A -- This alternative assumes that improvements to existing OUHSD high schools, beyond what is currently planned, would be required to address school capacity.

#### 5.3.3.1 No Project Alternative

According to the *CEQA Guidelines* (Section 15126.6(e)(3)(b)), the No Project Alternative is defined as the "circumstance under which the project does not proceed." Section 15126.6(e) of the CEQA Guidelines requires analysis of a no project alternative that (1) discusses existing site conditions at the time the NOP is prepared or the EIR is commenced, and (2) analyzes what is reasonably be expected to occur in the foreseeable future based on current plans if the proposed project were not approved. Under the No Project Alternative, the proposed project would not be implemented and the current General Plan Land Use and Specific Plan land use designations for the project Site would not be amended to allow for the proposed project. There would be a continuation of the existing agricultural land use. Potential impacts for the No Project Alternative are discussed as follows.

##### Aesthetics

Under this alternative, the project Site would remain under agricultural production and would not include any new type of development or uses on the project Site. There would be no change to the visual character of the Site and there would be no new sources of light or glare. There would be no impact to aesthetic resources. Impacts would be reduced in comparison to the proposed project.

##### Agriculture and Forestry Resources

Under this alternative, the project Site would remain under agricultural production and there would be no loss of Farmlands of Statewide Importance. There would be no impact to agriculture and forestry resources. Impacts would be reduced in comparison to the proposed project.

### Air Quality

Implementation of this alternative would not create new sources of regional air emissions. There would be no impact to air quality. Impacts would be reduced in comparison to the proposed project.

### Biological Resources

The project area has been disturbed by agricultural activities and little if any suitable habitat for sensitive wildlife exists on the project Site. Since no changes to land uses are proposed under this alternative, no impacts to existing biological resources on or surrounding the project Site would occur. Impacts would be reduced in comparison to the proposed project.

### Cultural and Tribal Cultural Resources

The project area has been disturbed by agricultural activities. This alternative would not include any new type of ground-disturbing activities or involve removal of any cultural resources. No impacts to cultural resources or tribal resources would occur. Impacts would be reduced in comparison to the proposed project.

### Energy

This alternative does not include uses that would create new sources of energy consumption. There would be no impact associated with wasteful, inefficient or unnecessary use of energy. Impacts would be reduced in comparison to the proposed project.

### Geology and Soils

Under this alternative, the project Site would remain under agricultural production and would not include any new type of development on the project Site. This alternative would not expose people or structures to any geological hazards or result in new activities resulting in soil erosion. There would be no impacts associated with geology and soils. Impacts would be reduced in comparison to the proposed project.

### Greenhouse Gas Emissions

This alternative does not include uses that would create new sources of regional air emissions and contribute to global climate change. There would be no impact associated with greenhouse gas emissions. Impacts would be reduced in comparison to the proposed project.

### Hazards and Hazardous Materials

Under this alternative, the project Site would remain under agricultural production and would not include any new type of development on the project Site. This alternative would not involve new activities that would expose people or structures to any hazards or hazardous materials. There would be no impacts associated with hazards or hazardous materials. Impacts would be reduced in comparison to the proposed project.

### Hydrology and Water Quality

Under this alternative, the project Site would remain under agricultural production and would not include any new type of development on the project Site. This alternative would not result in new activities resulting in impacts to water quality, depletion of groundwater supplies, changes in drainage or water runoff, or exposure of people or structures to any flooding hazards. There would be no impacts associated with hydrology and water quality. Impacts would be reduced in comparison to the proposed project.

### Land Use and Planning

This alternative would not involve any changes to the general plan or specific plan designations on the project Site. There would be no impacts associated with land use and planning. Impacts would be reduced in comparison to the proposed project.



### Noise

This alternative would not introduce new land uses that would generate construction or operational noise that would increase the ambient noise levels in the surrounding area. No impacts to existing noise levels would occur. Impacts would be reduced in comparison to the proposed project.

### Public Services

This alternative would not introduce new land uses that would create additional demands on public services at the project Site. However, without the construction of new educational facilities, the District would have to accommodate existing and anticipated future students at other District high schools that could result in adverse impacts to public schools. No impacts to public services would occur for police, fire, recreation or other public facilities. Impacts to public schools would be greater in comparison to the proposed project.

### Recreation

This alternative would not introduce new land uses that would create additional demands on requiring the construction or expansion of recreational facilities. However, without the construction of approximately 20.3 acres of new community facilities that will be available to the public through the CCA, there will not be the beneficial impact of lessening the physical impacts/demand on nearby park and recreational facilities. Impacts to recreation would be greater in comparison to the proposed project.

### Transportation

Under this alternative, development of the project Site would not occur. The project Site would remain predominately under agricultural production and traffic volumes in the surrounding area would not increase as a result of this alternative. This alternative would not have any impacts to the existing transportation system or traffic volumes and no roadway improvements would be provided. Impacts would be reduced in comparison to the proposed project.

### Utilities and Service Systems

This alternative would not introduce new land uses that would create additional demands on utilities and service systems. No impacts to utilities and service systems would occur. Impacts would be reduced in comparison to the proposed project.

### Conclusion and Relationship to Project Objectives

The No Project Alternative would result in the continuation of existing conditions on the project Site. The No Project Alternative would result in no significant impacts to any of the issue areas except to public schools. The District would have to accommodate existing and anticipated future students at other District high schools that could result in adverse impacts to public schools. This would be the environmentally superior alternative; however, the five Project Objectives would not be met.

## **5.3.3.2 Limited Expansion of Existing High Schools Alternative A**

OUHSD has a Measure A 2018 Facilities Master Plan that includes facilities improvements for all OUHSD's high schools. Two high schools in the area, Oxnard High School and Pacifica High School, are well beyond recommended capacity. This alternative assumes that improvements to these high schools and possibly other OUHSD high schools, beyond what is currently planned, would be required to address school capacity. OUHSD would not implement any changes to the project Site that would result in changes to the existing agricultural uses. Under the Limited Expansion of Existing High Schools Alternative A, it is assumed that increases in enrollment would have to be accommodated by existing OUHSD high schools and that expansion improvements would occur within the existing high school sites.

Potential impacts for the Limited Expansion of Existing High Schools Alternative A are discussed as follows.

### Aesthetics

Under this alternative, the project Site would remain under agricultural production and would not include any new type of development or uses on the project Site. There would be no change to the visual character of the Site and there would be no new sources of light or glare. There would be no impact to aesthetic resources on the project Site. Impacts would be reduced in comparison to the proposed project.

This alternative would require construction at existing high school sites, resulting in visual impacts from temporary construction activities. Construction activities would be temporary and short-term and thus would have minimal effect on aesthetics and visual quality, resulting in a less than significant impact. However, these impacts could be compounded by construction activities of improvements currently planned for OUHSD high schools. Expansion improvements would occur at existing high schools and would be expected to be of similar visual character, quality, and lighting, resulting in less than significant impacts. Impacts would be reduced in comparison to the proposed project.

### Agriculture and Forestry Resources

Under this alternative, the project Site would remain under agricultural production and expansion improvements would occur at existing high schools, so there would be no loss of Farmlands of Statewide Importance. There would be no impact to agriculture and forestry resources. Impacts would be reduced in comparison to the proposed project.

### Air Quality

Implementation of this alternative would involve construction at existing high school sites and increased enrollment at the high schools. This alternative would not result in population growth above what is forecasted in the 2030 General Plan and in turn the 2016 AQMP. Therefore, this alternative would not conflict or obstruct implementation of the applicable 2016 AQMP and the impact would be less than significant.

Construction emissions would occur at various sites but would occur only on a temporary basis and would not contribute to long-term air quality impacts. Thus, construction emissions resulting from this alternative would not be expected to have a significant impact on the environment.

Long-term or operational emissions are emissions that result from activities conducted during the operation of a project (e.g., heating, employee commute, student drop-off and pickup, and facility upkeep). Operational emissions from the existing high schools would be increased through any additional building square footage and increase in student enrollment. The combined increase from the expanded high schools is expected to be similar to the proposed project, as a similar number of additional students would be accommodated. However, this would depend on whether energy saving features, similar to the proposed project, could be implemented at existing high school sites. In addition, students that would be expected to walk to the proposed project, would likely require bus or personal owned vehicle transportation to the high schools, increasing emissions associated with these vehicles. Impacts would be less than significant but greater in comparison to the proposed project.

### Biological Resources

The project area has been disturbed by agricultural activities and little if any suitable habitat for sensitive wildlife exists on the project Site. Since no changes to land uses are proposed under this alternative, no impacts to existing biological resources on or surrounding the project Site would occur. Similarly, expansion improvements would occur at existing high schools and while expansion improvements may involve the removal of existing landscaped vegetation, little if any suitable habitat for sensitive wildlife is expected at these sites. Less than significant impacts would occur. Impacts would be reduced in comparison to the proposed project.

### Cultural and Tribal Cultural Resources

The project area has been disturbed by agricultural activities. Expansion improvements would occur at existing high schools where the sites have been disturbed by school construction. This alternative would not include any new

type of ground-disturbing activities or involve removal of any cultural resources. No impacts to cultural resources or tribal resources would occur. Impacts would be reduced in comparison to the proposed project.

#### Energy

As with the proposed project, expansion construction would be temporary and not anticipated to result in wasteful, inefficient or unnecessary use of energy. Energy use from the existing high schools would be increased through any additional building square footage and increase in student enrollment. The combined increase from the expanded high schools is expected to be similar to the proposed project, as a similar number of additional students would be accommodated. However, this would depend on whether energy saving features, similar to the proposed project, could be implemented at existing high school sites. In addition, students that would be expected to walk to the proposed project, would likely require bus or personal owned vehicle transportation to the high schools. The energy minimization associated with minimized and/or shorter vehicle trips is likely to result from the proposed project would not occur with this alternative. Impacts would be less than significant but greater in comparison to the proposed project.

#### Geology and Soils

Under this alternative, the project Site would remain under agricultural production and would not include any new type of development on the project Site. This alternative would not expose people or structures to any geological hazards or result in new activities resulting in soil erosion on the project Site.

Expansion improvements to existing high schools would require that the building design for any expansion structures use geotechnical building design recommendations that are based on a Site-specific ground motion hazard analysis for each expansion site in accordance with ASCE 7-10 (ASCE 2013) Chapter 21 as modified by Section 1803A.6 of the 2016 CBC (ICC 2017). Soil erosion could potentially occur during expansion construction activities would be reduced to a less than significant level with standard erosion mitigation measures, including the use of hay bales and other erosion control devices as determined by site-specific conditions. Less than significant impacts would occur. Impacts would be reduced in comparison to the proposed project.

#### Greenhouse Gas Emissions

This alternative would generate GHGs during construction and operation activities. GHG emissions from the existing high schools would be increased through any additional building square footage and increase in student enrollment. The combined increase from the expanded high schools is expected to be similar to the proposed project, as a similar number of additional students would be accommodated. However, this would depend on whether energy saving features, similar to the proposed project, could be implemented at existing high school sites. In addition, students that would be expected to walk to the proposed project, would likely require bus or personal owned vehicle transportation to the high schools. Impacts would be less than significant but greater in comparison to the proposed project.

#### Hazards and Hazardous Materials

Under this alternative, the project Site would remain under agricultural production and would not include any new type of development on the project Site. The expansion improvements would occur on existing high school sites, would therefore not be located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and no project impact would result. Impacts would be similar in comparison to the proposed project.

#### Hydrology and Water Quality

Under this alternative, the project Site would remain under agricultural production and would not include any new type of development on the project Site. This alternative would not result in new activities resulting in impacts to water quality, depletion of groundwater supplies, changes in drainage or water runoff, or exposure of people or structures to any flooding hazards on the project Site.

The expansion improvements would occur on existing high school sites and impacts associated with depletion of groundwater supplies or exposure of people or structures to any flooding hazards would not be expected. Water quality or changes in drainage or water runoff impacts associated with the expansion construction would require implementation of construction BMPs, reducing impacts to less than significant. Impacts would be reduced in comparison to the proposed project.

#### Land Use and Planning

This alternative would not involve any changes to the general plan or specific plan land use designations on the project Site. The expansion improvements would occur on existing high school sites and no changes to each site's General Plan land use or zoning designations would occur. There would be no impacts associated with land use and planning. Impacts would be reduced in comparison to the proposed project.

#### Noise

This alternative would not introduce new land uses to the project Site that would generate construction or operational noise that would increase the ambient noise levels in the surrounding area. No impacts to existing noise levels at the project Site would occur.

The expansion improvements would occur on existing high school sites and impacts associated with the Oxnard Airport could occur since at least one high school (Oxnard High School) is located within 2 miles of the Oxnard Airport. Noise and groundborne vibration generated by expansion construction would be similar to the proposed project but would occur at multiple locations. If construction takes place during the school year, noise levels could be disruptive to adjacent high school facilities. Mitigation similar to Mitigation Measure N-1 would be required to reduce these impacts to less than significant.

During operation, traffic levels would increase at OUHSD high schools in relation to increased enrollment. Similar to the proposed project, the associated increases in ADT would likely represent an increase of less than 1 dBA at the residences adjacent to the existing high schools and would have minimal impact on traffic noise conditions. As these are existing high schools, noise from rooftop mechanical equipment would not be expected to change significantly. Operational noise impacts would be less than significant. Impacts would be similar in comparison to the proposed project.

#### Public Services

This alternative would not introduce new land uses that would create additional demands on public services at the project Site. However, without the construction of new educational facilities, the District would have to accommodate existing and anticipated future students at other District high schools that could result in adverse impacts to public schools. Demands on other public services, police, fire, recreation or other public facilities, may increase incrementally with the increase in enrollment. Impacts to public schools would be greater in comparison to the proposed project.

#### Recreation

This alternative would not introduce new land uses that would create additional demands on requiring the construction or expansion of recreational facilities. However, without the construction of approximately 20.3 acres of new community facilities that will be available to the public through the CCA, there will not be the beneficial impact of lessening the physical impacts/demand on nearby park and recreational facilities. Impacts to recreation would be greater in comparison to the proposed project.

#### Transportation

Under this alternative, development of the project Site would not occur. The project Site would remain predominately under agricultural production and traffic volumes in the surrounding area would not increase as a result of this alternative.

While the proposed project is expected to add traffic within the study-area, the new high school would also capture school related trips within the study-area (tour-based VMT), resulting in an overall reduction of school related trip lengths for parents and students. Under this alternative, there would not be the overall reduction of school related trip lengths for parents and students. Traffic levels would increase at OUHSD high schools in relation to increased enrollment. Impacts would be greater in comparison to the proposed project.

#### Utilities and Service Systems

This alternative would not introduce new land uses that would create additional demands on utilities and service systems on the project Site. Demands on utilities and service systems at existing OUHSD high schools would increase incrementally with the increase in enrollment. Impacts would be similar in comparison to the proposed project.

#### Conclusion and Relationship to Project Objectives

The Limited Expansion of Existing High Schools Alternative A would result in the continuation of existing conditions on the project Site. The Limited Expansion of Existing High Schools Alternative A would have similar or greater impacts in some issue areas and reduce impacts in other issue areas. However, this alternative would not result in the significant and unavoidable impacts to agricultural land conversion (Agriculture and Forestry Resources) and windrow tree removal (Aesthetics). However, only some of the five Project Objectives would be met.

### 5.3.4 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. This would ideally be the alternative that results in fewer (or no) significant and unavoidable impacts. CEQA Guidelines Section 15126(d)(2) states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Table 5-1 provides a comparison of each alternative. The No Project Alternative would result in no impacts to any of the issue areas except to public schools. The District would have to accommodate existing and anticipated future students at other District high schools that could result in adverse impacts to public schools.

The Limited Expansion of Existing High Schools Alternative A would have similar or greater impacts in some issue areas and reduce impacts in other issue areas, however, this alternative would not result in the significant and unavoidable impacts to agricultural land conversion (Agriculture and Forestry Resources) and windrow tree removal (Aesthetics). The No Project Alternative would be the environmentally superior alternative but would not meet any of the five Project Objectives. The environmentally superior development alternative would likely be the Limited Expansion of Existing High Schools Alternative A since this alternative would not result in the significant and unavoidable impacts to agriculture and forestry resources and aesthetics and some of the five Project Objectives would be met.

**Table 5-1.** Summary of Project Alternatives

Issue Area	Proposed Project	No Project	Limited Expansion Alternative A
Aesthetics	S	NI	LTS
Agriculture	S	NI	NI
Air Quality	LTS/M	NI	LTS/M
Biological Resources	LTS/M	NI	LTS



Issue Area	Proposed Project	No Project	Limited Expansion Alternative A
Cultural and Tribal Cultural Resources	LTS/M	NI	LTS
Energy	LTS	NI	LTS
Geology and Soils	LTS/M	NI	LTS/M
Greenhouse Gas Emissions	LTS	NI	LTS
Hazards and Hazardous Materials	LTS	NI	LTS
Hydrology and Water Quality	LTS/M	NI	LTS
Land Use and Planning	LTS	NI	NI
Noise	LTS/M	NI	LTS/M
Public Services	LTS	S	LTS
Recreation	LTS	LTS	LTS
Transportation	LTS/M	NI	LTS
Utilities and Service Systems	LTS/M	NI	LTS

NI No Impact  
 LTS Less Than Significant  
 LTS/M Less Than Significant with Mitigation  
 S Significant and Unavoidable

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- Earnel Bihis
- Isidro Figueroa

#### California Department of Education

- Rob Corley

#### Division of the State Architect

- Ferris Karim
- David Brown
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## APPENDICES

APPENDIX A: NOP/IS, SCOPING MEETING MATERIALS, AND COMMENT LETTERS RECEIVED

APPENDIX B: LIGHTING PLAN

APPENDIX C: AIR QUALITY REPORTS

APPENDIX D: CULTURAL RESOURCES REPORTS

APPENDIX E: GEOTECHNICAL/GEOHAZARD REPORTS

APPENDIX F: PHASE I ENVIRONMENTAL SITE ASSESSMENT

APPENDIX G: PRELIMINARY ENVIRONMENTAL ASSESSMENT

APPENDIX H: SUPPLEMENTAL SITE INVESTIGATION

APPENDIX I: WATER PIPELINE SAFETY HAZARD ASSESSMENT

APPENDIX J: WATER RESOURCES SYSTEM REPORTS

APPENDIX K: TRAFFIC IMPACT ANALYSIS

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