

**INITIAL STUDY/ MITIGATED NEGATIVE
DECLARATION FOR THE
CONDOR DRIVE WAREHOUSE PROJECT
MOORPARK, CALIFORNIA**

Prepared for:

CITY OF MOORPARK
799 Moorpark Avenue
Moorpark, California 93021

Prepared by:

CHAMBERS GROUP, INC.
600 West Broadway, Suite 250
Glendale, California 91204

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SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT PURPOSE AND BACKGROUND INFORMATION

HPA Architecture (Applicant) proposes to convert an existing 200,668-square-foot warehouse building with 176,044 square feet of warehouse space at 6000 Condor Drive as a future local distribution center as well as develop an adjacent, vacant parcel as a parking lot (Project, Proposed Project) in Moorpark (City), Ventura County (County), California.

The existing warehouse building is a one-story concrete tilt-up building with dock-high doors present along the central portion of the building's perimeter wall. Currently, 388 standard parking spaces and 8 loading docks are available. The entire perimeter of the developed site is landscaped with medium to large trees. A sewer/storm drain easement is located along the northern edge of the property line. A vacant, undeveloped parcel is located to the northwest of the existing warehouse building.

The Project entails a lot merger, construction of a new parking lot, and tenant improvements for the conversion of the existing warehouse building on site for use as a distribution center.

The General Plan designates the Project site as Light Industrial (I-1), and the Project site is zoned Industrial Park (M-1). In compliance with the City's zoning ordinance, the Applicant applied for a Conditional Use Permit (CUP) in January 2020 to allow the renovation of an existing warehouse, construction of the expanded parking lot, and establishment of the use of a distribution center and transportation facility.

1.2 PROJECT LOCATION AND SITE CHARACTERISTICS

1.2.1 Location

The Project site includes two properties, a 11.78-acre parcel at 6000 Condor Drive (APN 513-0-060-075) developed with the existing warehouse building and a vacant area at the easterly portion of the lot. The second property is located immediately to the north of the main site and is composed of a 2.55-acre undeveloped parcel (513-0-060-295) just south of State Route 118 (SR-118). The Project site is located in the northeastern portion of the city of Moorpark within an industrial park adjacent to a floodway and SR-118. The Project site is surrounded by SR-118 to the north, open land to the east and southeast, and industrial buildings to the west and southwest. The Arroyo Simi creek is located approximately 100 feet south of the Project site at its closest point.

1.1.2 Site Access and Circulation

Access to the site will be via one existing, full access driveway on Condor Drive. Van and truck traffic will enter the site and immediately turn right to access their designated areas toward the northeast of the Project site. Employee traffic will enter the Project site and drive to the outdoor parking areas at the front of the building and to the southeast or interior parking area on the south side of the building. Condor Drive connects to SR-118 within approximately one-half mile of the Project site.

1.1.3 General Plan Designation/Zoning

The City's General Plan designates the Project site for Light Industrial (I-1) land uses, which include light industrial service, technical research, and business office use in a business park context.

The Project site is zoned M-1, which is consistent with the General Plan designation of Light Industrial (I-1). The purpose of this zone is to provide suitable areas for the exclusive development of light industrial, service, technical research, and related business office uses in an industrial park context, in conjunction with stringent standards of building design, noise, landscaping, and performance. Under the City's zoning ordinance, distribution and transportation facilities are a conditionally permitted land use in the M-1 zone with an approved CUP.

1.2 PROJECT DESCRIPTION

The Project proposes excavation, grading, landscaping, and building improvements to allow the operation of a warehouse distribution center. At the north end of the property, where the vacant 2.55-acre lot is located (APN 513-0-060-295), a lot merger is proposed to combine the two parcels into one parcel. The Project will involve the renovation of the existing 200,668-square-foot building that currently consists of 176,044 square feet of warehouse space. The Project would include approximately 7,262 square feet of office tenant improvements, the removal of the existing 11,304-square-foot mezzanine, and renovation of approximately 182,102 square feet of the warehouse space. Overall tenant improvements would total 189,364 square feet. The improvements include 13 new openings in the building shell to be used as warehouse loading docks to be opened during deliveries. The renovated warehouse distribution center building will be one story with the parcel containing a total of 113 standard parking stalls (9 feet by 20 feet) and 262 delivery parking stalls (11 feet by 27 feet). The 2.55-acre vacant parcel will be the location of an expanded parking lot that will have 150 of the delivery parking stalls.

In total, the Project will construct 375 new vehicle and van parking spaces. The Project will include drive aisles, landscaping, and other associated improvements inside the existing warehouse. Multiple signs, which are not a part of the Conditional Use Permit, are proposed to be installed. Two building signs are proposed, one on the north elevation and one on the west elevation; and various directional and informational signs will be provided on the west elevation. These signs will be applied for through the Sign Permit Application with the Planning Department.

1.2.2 Construction

Construction activities occurring on site will include site grading and excavation (no more than 4 feet in depth) and recompaction of existing surficial soils to provide a uniform surface for the new parking lots. In addition to contractor vehicles, heavy equipment will be used on site during construction which includes excavators, backhoe, bulldozer, bobcat, graders, compactors, and dump trucks. All equipment will be staged within the existing parking lot. If the CUP is approved, the duration of construction is expected to be approximately five months in duration.

1.2.2 Operations and Maintenance

The Project would expect to become operational within one year from the approval of the CUP. If approved, the Project will begin accepting deliveries, and the warehouse distribution center will operate

24 hours per day, 7 days a week. At the facility, 28 line haul trucks deliver packages to the warehouse distribution center between 10:00 p.m. and 8:00 a.m. Packages are then sorted by routes and placed onto moveable racks. Approximately 130 to 200 employees are anticipated to be employed onsite for sorting of packages. Approximately 72 employees would enter and depart for the first shift from 2:00 a.m. to 12:30 p.m. Approximately 22 employees would enter and depart for the second shift from 6:00 a.m. to 2:30 p.m. The third shift, from 1:30 p.m. to 10:00 p.m., would have approximately 22 employees entering and departing. The Prime Free Same Day (PFSD) shift from 2:00 p.m. to 6:00 p.m. would employ approximately 17 employees, and the Return to Station (RTS) shift from 12:00 p.m. to 10:30 p.m. would employ approximately 4 employees.

Four types of vehicle trips include employee commute trips, delivery vans, personal delivery vehicles, and line-haul trucks. The Project is estimated to generate approximately 944 trips per day, further described in Section 4.17 Transportation. Most trips will occur outside typical AM and PM peak-hour periods.

1.2.3 Entitlements and Permits

As required by the California Environmental Quality Act (CEQA) Guidelines, this section provides, to the extent the information is known, a list of permits and other approvals required to implement the Project.

The following discretionary approvals are required for the Project:

- Conditional Use Permit (CUP)
- Lot Merger
- Sign Permits

The following permits would be needed prior to commencement of construction:

- Grading Permits
- Dirt Hauling Permit for dirt removal from site, if necessary
- Encroachment Permits for work within City right-of-way, if necessary
- Building Permits
- Stormwater Construction General Permit including development of a Storm Water Pollution Prevention Plan (SWPPP)

Figure 1: Project Vicinity Map

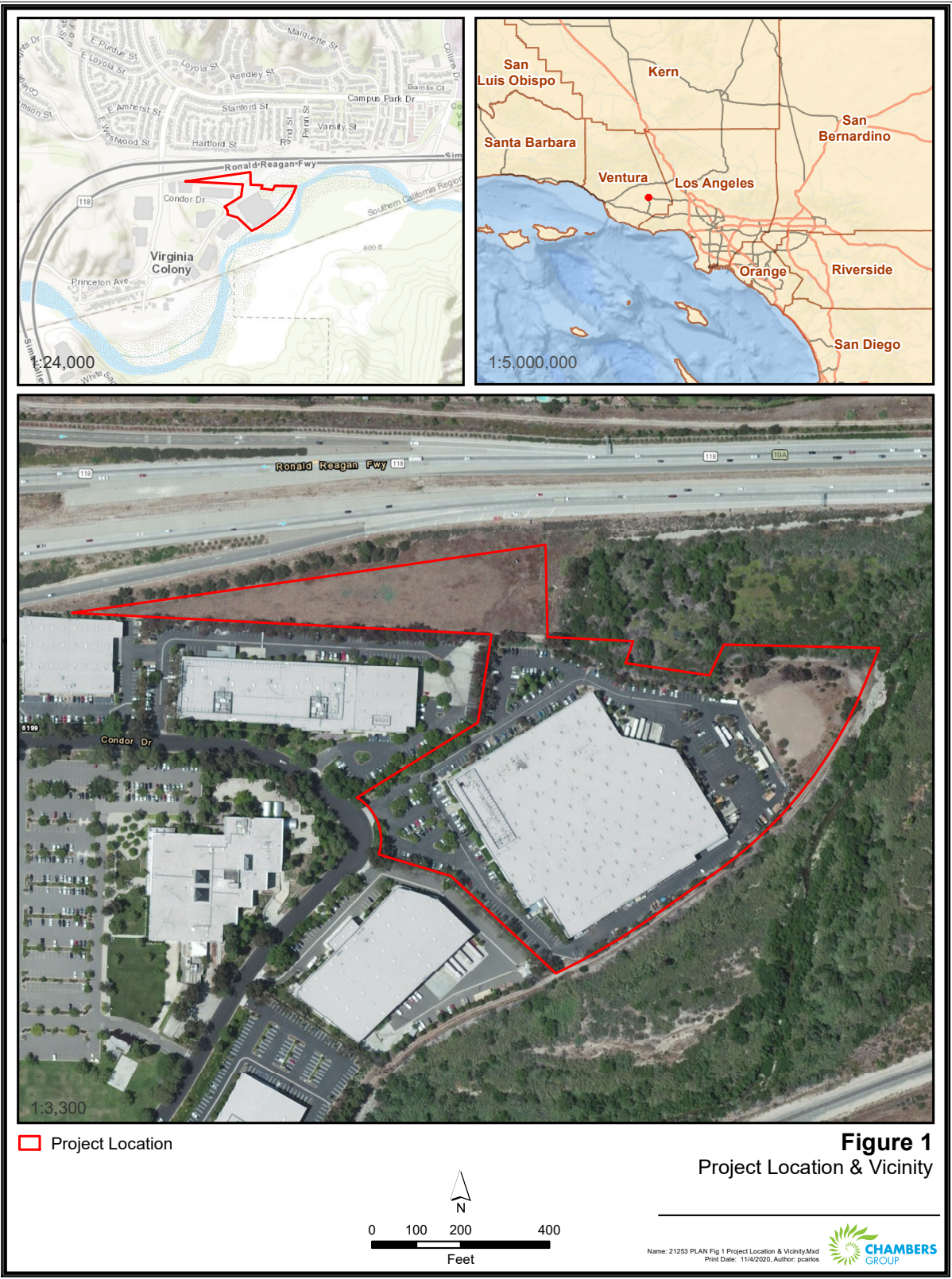
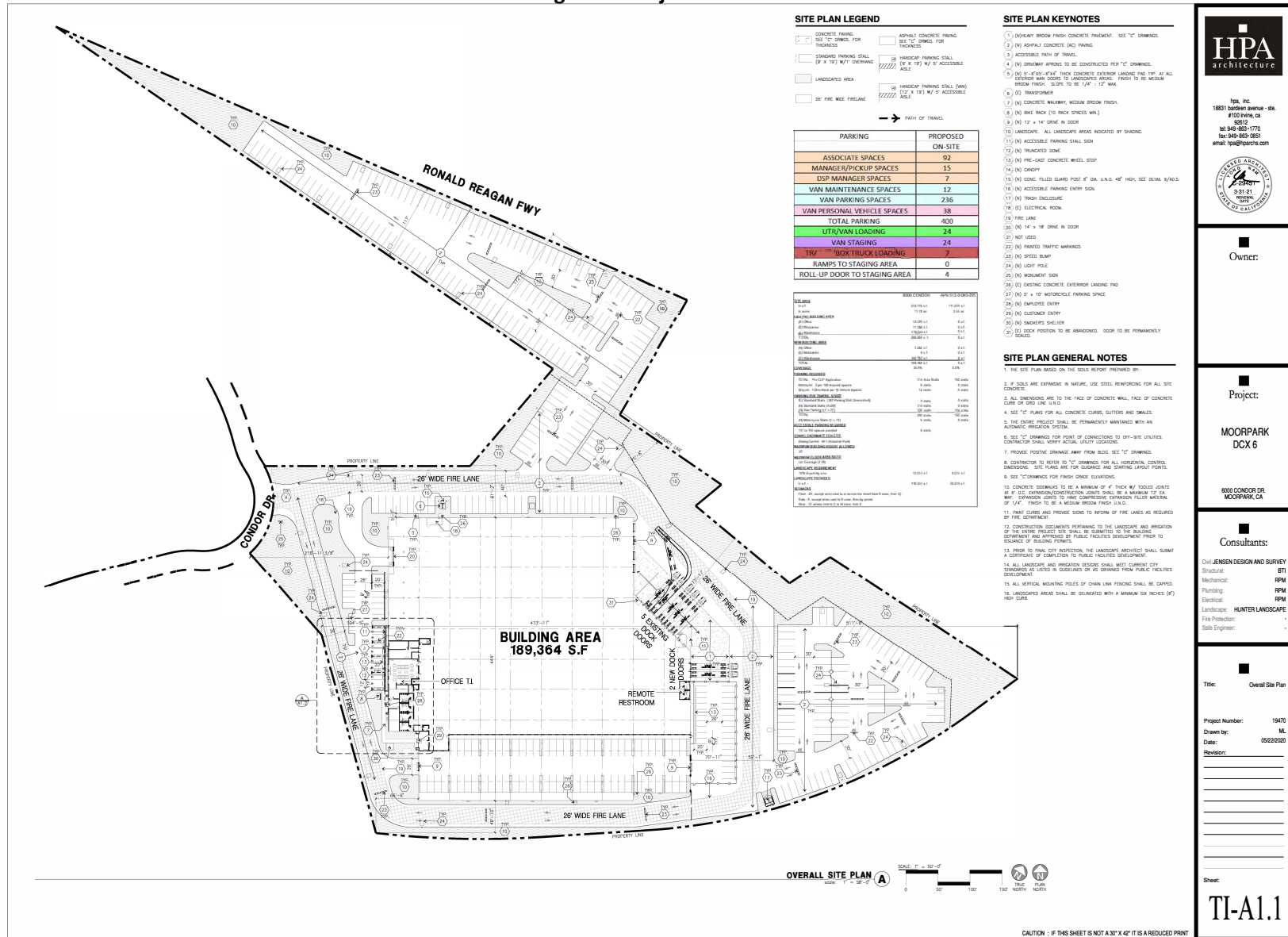


Figure 2: Project Site Plan



SECTION 2.0 – ENVIRONMENTAL DETERMINATION

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input type="checkbox"/> Geology /Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards & Hazardous Materials
<input type="checkbox"/> Hydrology /Water Quality	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population / Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities /Service Systems	<input type="checkbox"/> Wildfire	<input checked="" type="checkbox"/> Mandatory Findings of Significance

2.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☒
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐
4. I find that the proposed project **may have a "potentially significant impact" or "potentially significant unless mitigated impact"** on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐
5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature

Date

Name

Title

SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

*Note: Instructions may be omitted from final document.

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

1.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.1.1 Impact Analysis

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

Less Than Significant Impact. The Project site is located in the vicinity of a number of City-designated scenic corridors, including the Arroyo Simi creek, Los Angeles Avenue, Tierra Rejada Road, and State Route 23 (SR-23, Moorpark Freeway) (City 1986). Tierra Rejada Road and Los Angeles Avenue are approximately 1.5 miles south and southwest respectively, SR-23 is approximately 0.75 mile southwest, and the Arroyo Simi creek is approximately 100 feet south of the Project site (Google Maps 2020). Due to thick vegetation along the northern side of Tierra Rejada Road, the Project site would not be visible from the Tierra Rejada scenic corridor. Dense development, including SR-118, also exists between Los Angeles Avenue and the Project site; thus, the Project site would also not be visible from this scenic corridor. The Project site is within the viewshed for Moorpark Freeway and the Arroyo Simi creek, though the Project site is surrounded by industrial development to the west and southwest. Thus, views of the Project would be consistent with existing industrial views in the area, as the Project consists of renovation of an existing warehouse. A majority of the Project site is a previously approved, developed building; and the only proposed impacts to the site are the landscaping changes and the addition of a parking lot. Additionally, none of the nearby parks or trail systems have designated scenic viewpoints overlooking the Project site; and the Project site is not located within any of the scenic viewsheds designated in the City's General Plan (City 1986). Therefore, the Project construction and operation would not have an adverse effect on a scenic vista and impacts would be less than significant.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact. The Project is not located within a state scenic highway. A total of 39 mature trees, 11 native oak trees, 126 prohibited species trees, and 68 other trees would be removed onsite as a result of the Project (Appendix B). No officially designated state scenic highways are in the vicinity of the Project site; thus, none of the trees that would be removed are located within or within view of a state scenic highway (Caltrans 2019). Further, construction of the Project would not damage rock outcroppings or historic buildings, as neither are present at the Project site. No impacts to scenic resources within a state scenic highway would occur.

- c) *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?*

Less Than Significant Impact. The Project site is located within an urbanized area of the City. Located within a fully developed industrial park, the site is visible from the City's Arroyo Simi creek and Moorpark Freeway scenic corridors. No scenic viewpoints are overlooking the Project site. The Project is located within an urbanized area and would be consistent with all development and design standards dictated by the City's zoning and land use regulations for industrial development, in addition to the City's Landscape Design Standards and Guidelines (City 2012). Impacts would be less than significant.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less Than Significant Impact. The Project would construct new parking lots to the north and northeast of the existing warehouse building which would include safety lighting. The Project would also include new lighting for the new openings in the building shell that will be loading docks used during deliveries. All lighting would be constructed in compliance with the lighting regulations set forth in the City's Zoning Code, including using shielded lamps directed away from adjacent properties and streets; not exceeding 7 foot-candles on 95 percent or more of the grid points within the parking area; light poles not exceeding 25 feet in height; and curbed planters around all light poles (City 2020b). Compliance with these regulations would ensure that impacts associated with the Project's new parking lot lighting would be less than significant.

4.2 AGRICULTURE & FORESTRY RESOURCES

	AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2.					
(a)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.2.1 Impact Analysis

- a) *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?*

No Impact. Currently the land is zoned M-1 and designated by the General Plan as I-1, and therefore has been designated for industrial uses by the City (City 2008, 2019). According to the California Department of Conservation's Important Farmland Finder, the Project site does not encompass Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2020c). No impact would occur.

b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. The Project site is zoned M-1 and designated I-1 in the City's General Plan (City 2008, 2019). No land within the Project site is designated for agricultural uses. Moreover, a map of agricultural preserves produced for the County of Ventura's (County) 2040 General Plan Update shows no lands under Williamson Act contracts are within the Project site (County 2020). No impact would occur.

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

No Impact. The Project site is zoned M-1 and designated I-1 in the City's General Plan, and no land is designated as forest land or timberland within the Project site (City 2008, 2019). No impact would occur.

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. The Project site is zoned M-1 and designated I-1 in the City's General Plan, and no land is designated as forest land or timberland within the Project site (City 2008, 2019). No impact would occur.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?*

No Impact. The Project site is currently zoned M-1 and designated by the General Plan as I-1, and therefore has been designated for industrial uses by the City (City 2008, 2019). The Project site does not encompass Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and does not contain land currently under a Williamson Act contract (DOC 2020c; County 2020). Further, no designated forest land is within the Project site. No impacts would occur.

4.3 AIR QUALITY

3.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An Air Quality and Greenhouse Gas (GHG) Emissions Impact Analysis was produced for the Project by Vista Environmental in November 2020 to determine the air quality and GHG emissions impacts associated with the Project (Appendix A). The criteria air pollution impacts created by the Project were analyzed through use of CalEEMod Version 2016.3.2, which is a computer model published for estimating air pollutant emissions. Results from this analysis have been summarized and incorporated below. For more details regarding methods and results, see Appendix A.

4.3.1 Impact Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project involves renovating an existing warehouse building into a distribution center and expanding parking on site. The Project site is located within the South Central Coast Air Basin (Basin) and the boundaries of the Ventura County Air Pollution Control District (VCAPCD). The Project would not conflict with or obstruct implementation of the Ventura County Air Quality Management Plans (AQMPs). According to the VCAPCD Guidelines, a project is consistent with the growth projections provided in the AQMPs if the proposed project conforms to the applicable General Plan land use designations and if the projected population growth created by the proposed project is within the population forecasts developed by the Ventura Council of Governments for the project area. For this Project, the City of Moorpark General Plan's Land Use Plan defines the long-range land use assumptions that are represented in the AQMPs.

The Project site is currently designated as Light Industrial (I-1) in the General Plan. The proposed warehouse and distribution facility is a conditionally allowed use in the Light Industrial land use designation. As such, the Project is consistent with the current land use designation and is not anticipated to exceed the AQMP assumptions for the Project site. Projects that would result in direct population growth are limited to residential projects. Since the Project consists of a warehouse and distribution facility, implementation of the Project would not result in any population growth in Ventura County. It should also be noted that the Project would provide employment opportunities in an area that has more housing than jobs, and the Project would consist of development of a last mile delivery facility in an area that is currently serviced by distribution facilities that are located farther away. As such, development of the Project would assist in implementation of the AQMP by potentially reducing vehicle miles traveled (VMT), which is the measurement of travel for vehicle travel within a geographic region over a period of time. Based on the above, the Project will not result in an inconsistency with the AQMP. Therefore, a less than significant impact will occur in relation to implementation of the AQMP.

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

Less Than Significant Impact. The Project involves renovating an existing warehouse building and expanding parking on site. The Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard. The following section summarizes the potential air emissions associated with the construction and operations of the Project and compares the emissions to the VCAPCD criteria pollutant emissions standards detailed above.

Construction Emissions

If approved, construction is expected to last approximately five months in duration and would include renovation of the existing 200,688-square-foot building with 176,044 square feet of warehouse building space. The Project would include approximately 7,262 square feet of office tenant improvements, the removal of the existing 11,304-square-foot mezzanine, and the renovation of approximately 182,102 square feet of building space. In addition, the Project would construct a total of 375 new vehicle and van parking spaces, landscaping, and associated site improvements.

The VCAPCD Guidelines details that construction-related Reactive Organic Gases (ROG), Nitrogen Oxides (NO_x), and fugitive dust (particulate matter, PM₁₀ and PM_{2.5}) emissions should be quantified. As such, the CalEEMod model has been utilized to calculate the construction-related emissions from the Project; and the input parameters utilized in this analysis have been detailed in Appendix A. The worst-case summer and winter daily construction-related criteria pollutant emissions from the Project's construction activities are shown in Table 1, and the CalEEMod model daily printouts are included in Appendix A.

Table 1: Construction-Related Maximum Daily Air Pollutant Emissions

Season	Pollutant Emissions (pounds/day)			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Summer	227.40	46.44	10.82	5.47
Winter	227.49	46.45	10.82	5.47

Source: CalEEMod Version 2016.3.2.

As detailed in the VCAPCD Guidelines, the VCAPCD has not established quantitative thresholds for particulate matter (PM₁₀ and PM_{2.5}); and the 25-pound-per-day threshold for ROG and NO_x do not apply to construction emissions, since the emissions are temporary. However, the VCAPCD indicates that a project that may generate fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons; or which may endanger the comfort, repose, health, or safety of any such person; or which may cause or have a natural tendency to cause injury or damage to business or property would have a significant air quality impact.

In order to reduce air quality impacts from construction activities, the VCAPCD requires that all projects minimize construction emissions through adherence to the VCAPCD Rule 55 fugitive dust control measures and minimize ROG through adherence to the VCAPCD Rule 74.2 architectural coating Volatile Organic Compounds (VOC) content limits. Compliance with VCAPCD Rules 55 and 74.2 would ensure that construction emission would not be generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or that may endanger the comfort, repose, health, or safety of any such person or the public. Therefore, the impacts to air quality associated with the construction of the Project are anticipated to be less than significant.

Operational Emissions

As noted in Section 1.2, above, the warehouse is an existing industrial building that has been occupied, and continued use of other M-1 uses is allowed by right. The Project involves renovating an existing warehouse building into a distribution center and expanding parking on site. The ongoing operation of the Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the Project-generated vehicle trips, emissions from energy usage, and onsite area source emissions created from the ongoing use of the Project. The operations-related criteria air quality impacts created by the Project have been analyzed through use of the CalEEMod model, and the input parameters utilized in this analysis have been detailed in Appendix A. The summer and winter VOC, NO_x, carbon monoxide (CO), sulfur oxide (SO₂), PM₁₀, and PM_{2.5} daily emissions created from the Project's long-term operations have been calculated and are summarized in Table 2; and the CalEEMod daily emissions printouts are provided in Appendix A.

Table 2: Operational Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Area Sources ¹	5.28	<0.00	0.06	<0.00	<0.00	<0.00
Energy Usage ²	0.05	0.43	0.36	<0.00	0.03	0.03
Mobile Sources ³	2.63	9.85	31.12	0.11	9.62	2.63
Total Summer Emissions	7.95	10.28	31.54	0.11	9.65	2.66
Winter						
Area Sources ¹	5.28	<0.00	0.06	<0.00	<0.00	<0.00
Energy Usage ²	0.05	0.43	0.36	<0.00	0.03	0.03
Mobile Sources ³	2.49	10.29	31.53	0.10	9.62	2.63
Total Winter Emissions	7.82	10.72	31.95	0.10	9.65	2.66
VCAPCD Thresholds	25	25	--⁴	--⁴	--⁴	--⁴
Exceeds Threshold?	No	No	--	--	--	--

Notes:

¹ Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

² Energy usage consist of emissions from natural gas usage.

³ Mobile sources consist of emissions from vehicles and road dust.

⁴ VCAPCD does not provide a quantitative threshold for these pollutants.

Source: Calculated from CalEEMod Version 2016.3.2.

Table 2 shows that operation of the Project would not exceed the VCAPCD threshold for ROG and NO_x. Therefore, a less than significant air quality impact would occur from operation of the Project.

In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (also referred to as “Friant Ranch”), the California Supreme Court held that when an Environmental Impact Report (EIR) concluded that when a project would have significant impacts to air quality impacts an EIR should “make a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.” As shown in Table 2, and unlike the project at issue in the Friant Ranch case, the Project’s emissions of criteria pollutants would not exceed the Ventura County AQMD’s thresholds and would not have a significant air quality impact. Therefore, it is not necessary to connect this small Project’s air quality impacts to likely health impacts. However, for informational purposes this analysis considers the Court’s direction as follows:

- 1) The air quality discussion shall describe the specific health risks created from each criteria pollutant, including diesel particulate matter.

Although it has been determined that the Project would not result in significant air quality impacts, this analysis details the specific health risks created from each criteria pollutant shown in Table 2. In addition, the specific health risks created from diesel particulate matter is detailed above in Appendix A. As such, this analysis meets the part 1 requirements of the Friant Ranch Case.

- 2) The analysis shall identify the magnitude of the health risks created from the Project. The Ruling details how to identify the magnitude of the health risks. Specifically, on page 24 of the ruling it states, “The Court of Appeals identified several ways in which the EIR could have framed the analysis so as to adequately inform the public and decision makers of possible adverse health effects. The County could have, for example, identified the Project’s impact on the days of nonattainment per year.”

Table 2 shows that the primary source of operational air emissions would be created from mobile source emissions that would be generated throughout the Basin and would result in a less than significant impact to air quality. If a significant impact were to occur, any adverse health impacts created from the Project should be assessed on a basin-wide level. The Basin has been designated by the Environmental Protection Agency (EPA) for the national standards as a nonattainment area for ozone and PM_{2.5} and as partial nonattainment for lead. In addition, PM₁₀ has been designated by the State as nonattainment. It should be noted that VOC and NO_x are ozone precursors; as such, they have been considered as nonattainment pollutants.

According to The California Almanac of Emissions and Air Quality 2013 Edition prepared by the California Air Resources Board (CARB), the total ROG emissions for the County of Ventura in the year 2020 will be 11 tons per day, NO_x emissions will be 19 tons per day, SO_x emissions will be 1 ton per day, PM₁₀ emissions will be 18 tons per day, and PM_{2.5} emissions will be 6 tons per day. The Almanac does not provide any data for CO emissions. The Project contribution to each criteria pollutant in the Basin is shown in Table 3.

Table 3: Project's Contribution to Criteria Pollutants in the Air Basin

Emissions Source	Pollutant Emissions (pounds/day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Project Emissions ¹	7.96	10.72	31.95	0.11	9.65	2.66
Total Emissions in Air Basin ²	22,000	38,000	--	2,000	36,000	12,000
Project's Percent of Air Emissions	0.035%	0.028%	--	0.005%	0.027%	0.0022%

Notes:

¹ From the Project's total operational emissions shown above in Table 2.

² California Almanac of Emissions and Air Quality 2013 Edition.

As shown in Table 3, the Project would increase criteria pollutant emissions by as much as 0.035 percent for ROG in the County. Due to these nominal increases in the Basin-wide criteria pollutant emissions, no increases in days of non-attainment are anticipated to occur from operation of the Project. Accordingly, because the Project results in a less than significant impact to air quality, operation of the Project is not anticipated to result in a quantitative increase in premature deaths, asthma in children, days children will miss school, asthma-related emergency room visits, or an increase in acute bronchitis among children due to the criteria pollutants created by the Project. Impacts would be less than significant.

Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant.

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

Less Than Significant Impact. The Project would not expose sensitive receptors to substantial pollutant concentrations. The Project involves renovating an existing warehouse building and expanding parking on site. The VCAPCD Guidelines detail that carbon monoxide hotspots, fugitive dust, toxic air contaminant impacts, and San Joaquin Valley Fever Project-related impacts to nearby sensitive receptors should be analyzed. The nearest sensitive receptors to the Project site are single-family homes located on the north side of SR-118 that are as near as 300 feet north of the Project site.

Carbon Monoxide Hotspot Analysis

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential impacts to sensitive receptors. According to the VCAPCD Guidelines, a CO screening analysis should be conducted for intersections that would be significantly affected by a project and that experience, or are anticipated to experience, level of service (LOS) E or F. "Hot spots" are defined as locations where local ambient CO concentrations exceed the State or federal ambient air quality standards.

According to the Traffic Impact Study for 6000 Condor Drive Warehousing/Distribution Facility (NV5 2020; Appendix E), three intersections will operate at LOS E or F for the “with project” condition and include:

- Princeton Avenue and Condor Drive North – LOS E
- Princeton Avenue and SR-118 Eastbound Ramps – LOS F
- Princeton Avenue and Condor Drive South – LOS F

It should be noted that since the warehouse building on the Project site currently exists, the Traffic Impact Study found that the LOS would actually improve for the first two listed intersections; and, although the delay at the intersection at Princeton Avenue and Condor Drive South would increase by as much as 10.4 seconds for the PM peak hour, it is created by an additional 21 PM peak hour trips at this unsignalized intersection. As such, due to the nominal Project trips at this intersection, the Project would create a less than significant impact to CO hotspots.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust (PM₁₀ and PM_{2.5}) emissions that may have a substantial, although temporary, impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the immediate vicinity of the proposed construction activities. Fugitive dust emissions from the Project would be created during onsite earth-moving activities. The anticipated onsite worst-case PM₁₀ emissions for each phase of construction have been provided above in Table 3. However, it should be noted that fugitive dust emissions vary substantially from day to day, depending on the level and type of activity and weather conditions. Additionally, most of the PM₁₀ emissions from onsite construction activities are from inert silicates, rather than the complex organic particles released from combustion sources, which are more harmful to health.

Construction activities associated with the Project would be required to implement emissions control measures detailed in VCAPCD Rule 55 fugitive dust control measures. With implementation of VCAPCD’s Rule 55, the Project would not exceed the VCAPCD standards for fugitive dust. Fugitive dust emissions would be less than significant for construction activities, and no fugitive dust emissions are anticipated to occur from operational activities.

Toxic Air Contaminants (TAC) Impacts

The greatest potential for toxic air contaminant emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the Project. According to the VCAPCD and California Air Pollution Control Officers Association (CAPCOA) methodology, health effects from carcinogenic air toxins are usually described in terms of “individual cancer risk.” “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of toxic air contaminants (TACs) over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment and the short-term construction schedule, the Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment

in California. This regulation limits idling of equipment to no more than five minutes and requires equipment operators to label each piece of equipment and provide annual reports to the California Air Resources Board (CARB) of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet. Currently, no commercial operator is allowed to purchase Tier 0 or Tier 1 equipment; and, by January 2023, no commercial operator is allowed to purchase Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the Project. As such, construction of the Project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

Particulate matter (PM) from diesel exhaust is the predominant TAC in most areas. According to The California Almanac of Emissions and Air Quality 2013 Edition, prepared by CARB, about 80 percent of the outdoor TAC cancer risk is from diesel exhaust. Some chemicals in diesel exhaust, such as benzene and formaldehyde, have been listed as carcinogens by State Proposition 65 and the federal Hazardous Air Pollutants program.

According to the VMT Study for DCX6 Delivery Station 6000 Condor Drive (NV5 2021; Appendix F), the Project would generate 28 line-haul truck deliveries per day during operations. According to the Health Risk Assessments for Proposed Land Use Projects, prepared by CAPCOA, July 2009, a truck distribution facility that accommodates 100 or more truck deliveries per day has the potential to create significant health risks from TAC emissions. Since the Project would generate a quarter of the truck trips that CAPCOA found would have the potential to create significant health risks, a less than significant TAC impact would occur during the ongoing operations of the Project; and no mitigation would be required.

San Joaquin Valley Fever

San Joaquin Valley Fever, or coccidioidomycosis, is an infection caused by inhalation of the spores of the fungus *Coccidioides immitis*. The spores live in soil and can live for an extended time in harsh environmental conditions. Activities or conditions that increase the amount of fugitive dust contribute to greater exposure and include dust storms, grading, and recreational off-road activities.

The Project would have the potential to disturb the soil during construction activities. However, most of the Project site is currently developed. As such, the Project site does not meet any of the potential conditions detailed in the VCAPCD Guidelines of sites that are likely to contain San Joaquin Valley Fever. In addition, construction activities will be required to adhere to the VCAPCD Rule 55 fugitive dust control measures that will minimize the generation of fugitive dust that contributes to the exposure of persons to San Joaquin Valley Fever. Therefore, impacts to San Joaquin Valley Fever would be less than significant.

Overall, impacts regarding the Project's potential to expose sensitive receptors to substantial pollutant concentrations would be less than significant.

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

Less Than Significant Impact. The Project would not create objectionable odors affecting a substantial number of people. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents, and emissions from diesel equipment. The objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the Project site's boundaries. Due to the transitory nature of construction odors, a less than significant odor impact would occur; and no mitigation would be required.

Operations-Related Odor Impacts

The Project would consist of the development of a warehouse distribution facility. Potential sources that may emit odors during the ongoing operations of the Project would primarily occur from odor emissions from the trash storage areas. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Due to the distance of the nearest receptors from the Project site and through compliance with City regulations, no significant impact related to odors would occur during the ongoing operations of the Project. Therefore, a less than significant odor impact would occur; and no mitigation would be required.

4.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.4.1 Environmental Setting

Chambers Group, Inc.'s (Chambers Group's) Biologist Heather Clayton performed a site visit to the Project site on August 26, 2020. The Project site is in a developed industrial park. The Project site is bounded by SR-118 to the north, open land to the east and southeast, and industrial buildings to the west and southwest. The open land area to the east is part of the Arroyo floodway and the SR-118 right-of-way. Trees observed within and around the Project boundary included 385 large to medium-sized trees, 15 of which are native, including coast live oak (*Quercus agrifolia*) and a single white alder (*Alnus rhombifolia*). The site was surveyed for potential habitat for special status wildlife species such as least Bell's vireo with the greatest focus on the vacant and open spaces within the site. The findings of this investigation are outlined below. The vacant and open spaces on site were characterized as sparsely vegetated and highly disturbed.

4.4.2 Impact Analysis

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

Less Than Significant Impact With Mitigation. A search of the California Natural Diversity Database (CNDDB) identified four special status species with potential to occur within the Project site and seven with potential to occur within 1 mile of the Project site (Figure 3). The special status species with potential to occur are listed below:

Potential to Occur within the Project Site:

- California legless lizard
- Southern Willow Scrub
- arroyo chub
- least Bell's vireo

Potential to Occur within 1 Mile of the Project Site:

- Lyon's pentachaeta

- San Diego desert woodrat
- Southern Riparian Scrub
- coastal California gnatcatcher
- mesa horkelia
- southern California rufous-crowned sparrow
- white-tailed kite

The Project site consists of an existing warehouse, existing parking lots, and vacant land to the north and northeast. The vacant land on site would be graded and paved for parking stalls as a result of the Project. The portion of the Project site that is currently vacant land is characterized as sparsely vegetated and highly disturbed, as it is located directly south of a SR-118 on-ramp and north of a parking lot. The northeastern portion of the Project site is also characterized as sparsely vegetated and disturbed, as it was previously used as a recreation area for employees working at the existing warehouse and contains a volleyball net, three portable benches, and two polyvinyl chloride (PVC) soccer goals. Further, the U.S. Fish and Wildlife Service's (USFWS's) Critical Habitat for Threatened and Endangered Species identifies no critical habitat within the Project site (USFWS 2020). Habitat needed for the least Bell's vireo consists of native mule fat (*Baccharis salicifolia* subsp. *salicifolia*) and willow (*Salix* spp.), which were not present on the Project site. Therefore, the Project site does not provide habitat suitable to support least Bell's vireo. Nonetheless, the least Bell's vireo is a state and federally listed endangered species with the potential to occur within the Project site; thus, mitigation measures MM-BIO-1 and MM-BIO-2 below will be implemented:

MM-BIO-1: A nesting bird pre-construction survey will be conducted by a Qualified Biologist and submitted to the City three days prior to demolition and/or vegetation removal activities during nesting bird season (February 15 through August 31). Should nesting birds be found, an exclusionary buffer will be established by a Qualified Biologist. The buffer may be up to 500 feet in diameter depending on the species of nesting bird found. This buffer will be clearly marked in the field by construction personnel under guidance of the Qualified Biologist, and construction or clearing will not be conducted within this zone until the Qualified Biologist determines that the young have fledged or the nest is no longer active. Nesting bird habitat within the Project site will be resurveyed during bird breeding season if a lapse in construction activities lasts longer than seven days.

MM-BIO-2: Project-related activities likely to have the potential to disturb suitable bird nesting habitat shall be prohibited from February 15 through August 31, unless a Project Biologist acceptable to the City surveys the Project area prior to disturbance to confirm the absence of active nests. Disturbance shall be defined as any activity that physically removes and/or damages vegetation or habitat or any action that may cause disruption of nesting behavior such as loud noise from equipment and/or artificial night lighting.

Implementation of MM-BIO-1 and MM-BIO-2 would reduce Project-related impacts to nesting birds to less than significant. Therefore, impacts to special status species would be less than significant with mitigation.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

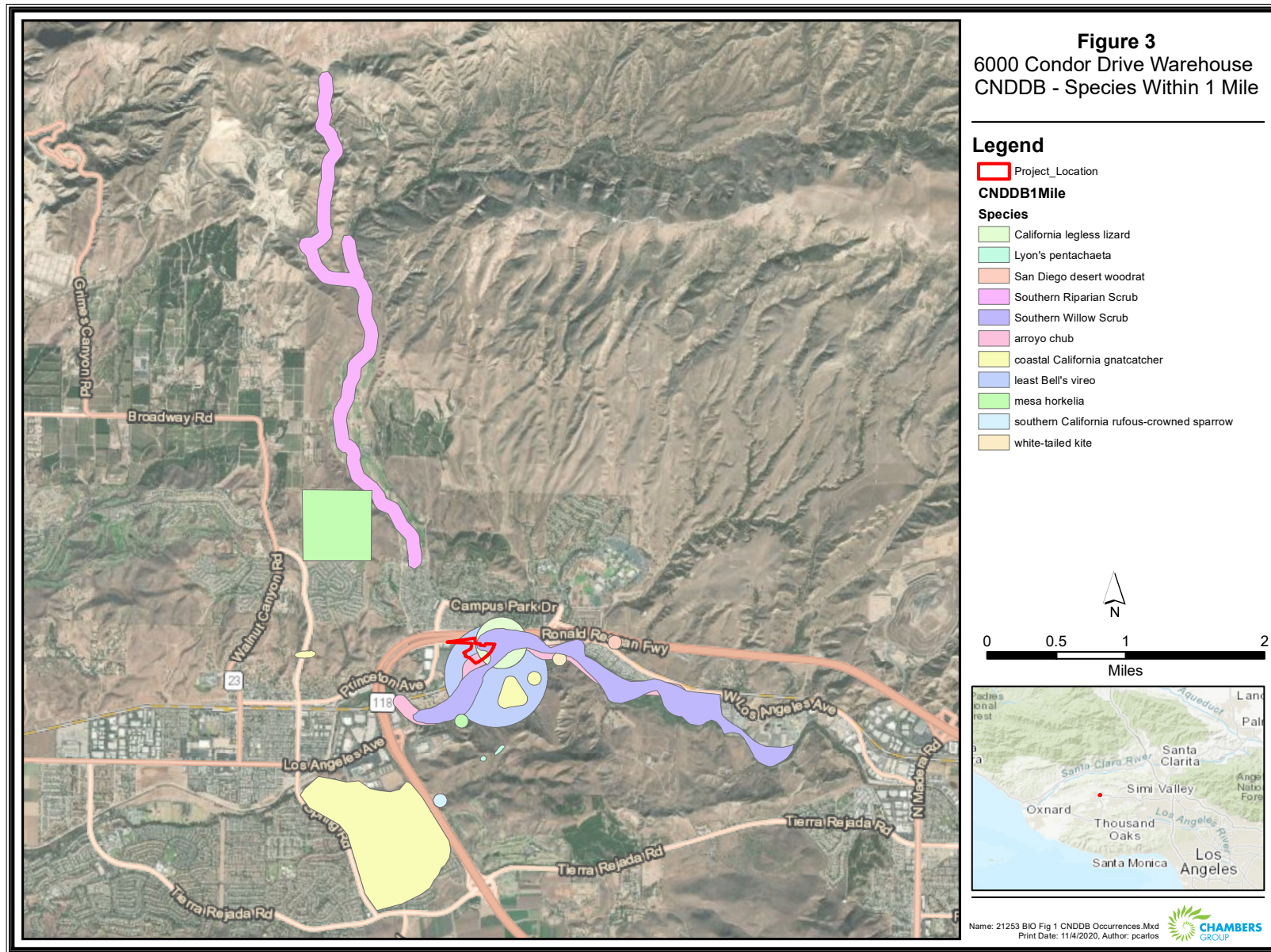
Less Than Significant Impact. According to the USFWS's National Wetlands Inventory, no riparian habitat occurs within the Project site boundary (USFWS 2020). Land bordering the Project site to the south and east is classified as Freshwater Forested/Shrub Wetland, but all ground disturbance would remain entirely within the Project site. To prevent offsite impacts to nearby wetlands resulting from stormwater runoff, the Project would be required to obtain coverage under a Construction General Permit to comply with National Pollutant Discharge Elimination System (NPDES) requirements. Compliance with the Construction General Permit would require the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs). The BMPs would include measures that would be implemented to prevent discharges into adjacent wetland from the Project site during construction activities.

To prevent significant impacts to the bordering wetland due to increased runoff at the Project site during operations, catch basins will be installed throughout the site; and an onsite storm drain system will convey runoff to one of four proposed underground infiltration/detention systems. Outlets from these retention/detention areas will follow existing drainage patterns and outlet to the Arroyo Simi creek approximately 100 feet to the southeast, although the infiltration systems would be constructed so as to facilitate removal of silt and clay or other deleterious materials from any water that may enter the system (Appendix C). With implementation of these design features, Project construction and operations would not substantially degrade the adjacent wetland. Impacts would be less than significant.

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

Less Than Significant Impact. The Project is located approximately 100 feet north of the Arroyo Simi creek, which may provide a means of movement and migration, as well as a nursery, for fish species in the area. However, all construction and operational activities associated with the Project would remain entirely within the Project site boundary. Additionally, outlets from the Project's retention/detention areas will follow existing drainage patterns and outlet to the Arroyo Simi creek, but the Project would not impede flow of the Arroyo Simi creek. No other potential wildlife corridors have been identified in the Project vicinity. Impacts would be less than significant.

Figure 3: California Diversity Database Map



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

Less Than Significant Impact with Mitigation. According to the City's Municipal Code Chapter 12.12 Historic Trees, Native Oak Trees, and Mature Trees, tree removal permits are required to remove, cut down, or destroy a native oak tree, historic tree, or other mature tree. Prior to issuance of a tree removal permit, a site inspection and tree appraisal must be performed (City 2020b). In August 2020, an Arborist Report (Appendix B) was produced by a Registered Consulting Arborist at Class One Arboriculture, which details the trees on and around the Project site, appraises the value of trees on site, and offers recommendations to limit Project-related impacts.

A total of 39 mature trees, 11 native oak trees, 126 prohibited species trees, and 68 other trees will be removed for a total of 244 trees. One protected mature tree proposed for removal is growing on a neighboring property at 6100 Condor Drive. It will be removed because too many of its roots would be severed by proposed grading along the property line. No other protected or significant trees will be removed. No other protected or significant trees on neighboring properties will be removed. Trees on neighboring properties that will be removed include one mature tree and six prohibited tree species on an adjacent property, and the applicant will obtain authorization from the neighboring property owners affected by the tree loss prior to Project approval. The total appraised value of all trees recorded in the Arborist Report is \$805,065.22, and the total appraised value of all trees proposed to be removed during construction of the Project is \$437,243.41 (Appendix B). The Applicant will obtain the necessary tree removal permits prior to Project construction. As part of the City's condition of approval, the City will require that the value of the trees to be removed will be used to upsize and increase the proposed landscaping at the Project site.

Additionally, in order to protect mature and native oak trees remaining on site during Project construction and operations, the following mitigation measure, MM-BIO-3, will be implemented.

MM-BIO-3: In order to protect mature and native oaks trees on site, the following measures will be implemented for pre-construction, during construction, and post-construction, as follows:

Pre-Construction

- Tree protection zone fencing will be erected as shown in the Arborist Report (Appendix B). No construction activity, heavy equipment access, or materials storage will take place within the tree protection zones during construction without the direct supervision and approval of a Certified Arborist. Fencing will be sturdy, in ground, at least 4 feet in height, and brightly colored.
- Supplemental irrigation will be applied to specific trees listed in the Arborist Report (Appendix B). Irrigation will moisten the soil to a depth of 6 to 12 inches, which may take several hours at a slow application rate. This supplemental irrigation will be applied twice per month from May through September.
- When pruning becomes necessary, a crew directly supervised by a Certified Arborist will be hired on site to ensure the pruning cuts are made to branch unions and do not remove an excessive amount of foliage. Pruning will occur

only when deemed necessary by the Project Arborist. As much live foliage as possible will be preserved through the construction process to give the trees the best opportunity to thrive after construction is complete.

- Permission will be obtained from the respective neighboring property owners to impact trees growing on adjacent properties.
- After obtaining City permits, the trees approved for removal will be removed and will be supervised by the Certified Arborist.

During Construction

- All construction personnel will be informed of the intention to preserve the trees.
- If any changes are made to the plans resulting in any excavation or equipment access within the dripline of any protected tree, the Project Arborist will be informed. Additional protection measures will be discussed, if required.
- Throughout the construction period, a Certified Arborist will make periodic site visits to ensure the tree protection plan is being followed.
- No construction activity will take place within the tree protection fencing. This includes construction worker access, materials storage, and equipment access.
- If any tree is injured during construction, the Project Arborist will be informed within 24 hours so it may be evaluated and treated as soon as possible.
- The tree protection zone fencing will be retained until construction activity has been completed or until the landscape installation phase begins. Even when landscapers are permitted near the trees, they will be made aware of the intention to preserve the tree and the roots if any digging is performed for irrigation lines or plant installation.
- Excavation and Root Management:
 - Excavation within the upper 36 inches of soil within a protected tree's drip line will be performed with hand tools or pneumatic excavation tools only.
 - Excavation within a protected tree's drip line will be directly supervised by a Certified Arborist.
 - If roots larger than 2 inches in diameter are uncovered, the Project Arborist will determine if they may be severed or if they should be retained.
 - If roots must be severed, they will be cut cleanly with a sharp cutting tool to minimize the exposed cross-sectional root area.

Post-Construction

- The leaf drop around the root zone of the subject trees will be retained where practical. If leaf drop is not practical for use, a layer of coarse mulch 2 to 4 inches thick will be applied around the base of the trees intended for preservation.
- The subject trees will be monitored by a Certified Arborist for development of disease, decay, or other symptoms of stress due to construction activity. Deadwood may be removed as it appears; and as much live wood as possible will be retained on the trees, provided that it does not come into conflict with the infrastructure.
- Supplemental irrigation will continue to be supplied to trees specified in the Arborist Report (Appendix B), as described above.

Through obtaining tree removal permits required from the City and implementation of the Best Management Practices outlined in the Project's Arborist Report (MM-BIO-3), the Project would be in compliance with Chapter 12.12 of the City's Municipal Code and impacts to Historic Trees, Native Oak Trees, and Mature Trees. The City has no other local policies or ordinances protecting biological resources; therefore, impacts would be less than significant with mitigation incorporated.

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

No Impact. The Project site is not located in an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plans. Therefore, no impact would occur.

4.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.5.1 Impact Analysis

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

Less Than Significant Impact. The Project involves renovation of an existing warehouse building built in 1988 (LoopNet 2020). According to CEQA, all buildings constructed over 50 years ago and possessing architectural or historical significance may be considered potential historic resources; proposed changes to these buildings may require some level of environmental review. Since the existing warehouse on the Project site is approximately 32 years old, it is not considered a historic resource. In addition, the Ventura County Historical Landmarks and Points of Interest document does not identify the Project site or nearby properties as historical landmarks or points of interest (County 2016). The remaining area of the Project site is currently paved or otherwise heavily disturbed from the construction of the existing warehouse building or nearby SR-118. Moreover, grading and excavation associated with the Project would not extend beyond 4 feet in depth. No historic resources are expected to be encountered due to previous ground disturbance on site; therefore, impacts would be less than significant.

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

Less Than Significant Impact with Mitigation. A records search was requested from the South Central Coast Information Center (SCCIC), and a records search summary was provided on November 10, 2020. The records search found no archaeological or built-environment resources within the Project area, with two archaeological resources and nine built-environment resources within 0.25 mile of the Project site. The Project involves a renovation of an existing warehouse building and expansion of parking. The Project site is currently developed, paved, or otherwise heavily disturbed from the construction of the existing warehouse building or the nearby SR-118. Grading and ground disturbance associated with the Project would be limited, required only for leveling of the vacant lots in preparation for paving. The reported records search result does not preclude the possibility that surface or buried artifacts might be found during a survey of the property or ground-disturbing activities. While currently no recorded archaeological sites are within the Project area, buried resources could potentially be unearthed during Project activities. Therefore, mitigation measure MM-CUL-1 is provided to reduce impacts to less than significant:

MM-CUL-1: If any archeological or historical finds are uncovered during grading or excavation operations, all grading or excavation shall immediately cease in the immediate area and the find must be left untouched. The Applicant, in consultation with the Project Paleontologist or Archaeologist, shall assure the preservation of the site and immediately contact the Community Development Director by phone, in writing by email, or hand delivered correspondence informing the Director of the find. In the absence of the Director, the Applicant shall so inform the City Manager. The Applicant shall be required to obtain the services of a Qualified Paleontologist or Archaeologist, whichever is appropriate, to recommend disposition of the site. The Paleontologist or Archaeologist selected must be approved in writing by the Community Development Director. The Applicant shall pay for all costs associated with the investigation and disposition of the find.

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

Less Than Significant Impact. The Project involves renovation of an existing warehouse building and expansion of parking on site. The Project site is currently developed, paved, or otherwise heavily

disturbed from the construction of the existing warehouse building or SR-118. Due to previous disturbances, and because any ground-disturbing activities are not expected to disturb native soils, no human remains are expected to be encountered during ground-disturbing activities. Should human remains be uncovered during construction, as specified by State Health and Safety Code Section 7050.5, no further disturbance would occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to Public Resources Code (PRC) 5097.98. If such a discovery occurs, excavation or construction would halt in the area of the discovery, the area would be protected, and consultation and treatment would occur as prescribed by law. If the County Coroner recognizes the remains to be Native American, he or she would contact the Native American Heritage Commission, who would appoint the Most Likely Descendant. Additionally, if the bones are determined to be Native American, a plan would be developed regarding the treatment of human remains and associated burial objects, and the plan would be implemented in coordination with the Most Likely Descendant.

4.6 ENERGY

6.	ENERGY Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.6.1 Impact Analysis

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

Less Than Significant Impact. The Project involves renovating an existing warehouse building and expanding parking on site. The shell of the existing warehouse will include new openings but will not extend beyond its current footprint. Existing gas, water, sewer, electrical, and telecommunications infrastructure will remain as is during construction. Project construction activities would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Power may also be required for electric construction equipment. Construction is anticipated to be temporary, lasting only approximately five months. Additionally, Project construction would comply with all applicable State and local regulations related to renewable energy and energy efficiency, including the 2019 California Building Energy Efficiency Standards and the 2019 California Green Building Standards Code.

Considering land use at the Project site would remain similar to previous uses on site, as a distribution center with associated parking, energy demand from Project site operations would be substantially similar to previous energy use on site. This includes fuel consumed by passenger vehicles; natural gas consumed for heating the warehouse distribution center building; and

electricity consumed by the warehouse distribution center building including, but not limited to, lighting, water conveyance, and air conditioning.

Offsite Project energy consumption may change from previous offsite energy consumption, as the Project would operate as an Amazon delivery station supporting the delivery of packages from the Project site to customer locations in the area. The Project may also employ more people on site, resulting in more commuter trips off site. As detailed in the VMT Memo (NV5 2021; Appendix F), the Project is forecast to generate 994 daily trips; and 8,743 VMT would be generated by employee commutes, delivery van trips, and private courier trips. As explained in the VMT Memo, Amazon's delivery stations are located within the company's larger delivery area to consolidate deliveries in smaller geographic areas; and Amazon will implement VMT reduction strategies to reduce commuter trips (Appendix F). The incorporation of travel demand management strategies, as listed in MM TRA-1 in Section 4.17, would reduce the current VMT per employee.

Overall, energy usage during construction and operation of the Project would not be wasteful, inefficient, or unnecessary; and impacts would be less than significant.

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

Less Than Significant Impact. The Project would comply with all applicable State and local regulations related to renewable energy and energy efficiency, including the 2019 California Building Energy Efficiency Standards and the 2019 California Green Building Standards Code. The Project would also align with any application energy efficiency requirements detailed in the City's sustainability report and General Plan. Therefore, the Project will have a less than significant impact on the State or local plan for renewable energy or energy efficiency.

4.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.7.1 Impact Analysis

- a) i) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. The City is located in a region with several active faults and therefore is subject to the risk and hazards associated with earthquakes. The Project site is not located within an Alquist-Priolo Fault Zone but is approximately 1.4 miles north of the Simi-Santa Rosa fault zone (DOC 2020a). The California Division of Mines and Geology has designated an Alquist-Priolo Fault Zone for many of the traces of the Simi-Santa Rosa fault zone. The Project consists of renovating an existing warehouse, which would remain within the existing footprint of the current building and would require ground disturbance only to construct additional parking lots. Use of the Project site would therefore remain the same as anticipated during construction of the original warehouse. Moreover, grading required for the Project is anticipated to be minimal and would not exacerbate the risk of rupturing a known earthquake fault through extensive ground disturbance. Impacts would be less than significant.

- ii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

Less Than Significant Impact. As noted above in Impact 4.7.1 a) i), the Project site is subject to potential ground shaking due to nearby faults. Impacts associated with strong seismic ground shaking would be minimal due to ground disturbance (up to 4 feet of excavation and grading) associated with the Project for the construction of new parking lots. Minimal grading required for the proposed parking lots would not exacerbate the risk of ground shaking at the Project site. Additionally, renovations to the existing warehouse would occur entirely within the footprint of the current building; and use of the Project site would remain substantially similar to uses anticipated

during construction of the original warehouse. Therefore, implementation of the Project would result in a less than significant impact associated with strong seismic ground shaking.

iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The Project site is located within the Simi Valley West liquefaction zone (DOC 2020a). The Project involves renovation of an existing warehouse into a distribution center, which would remain within the existing footprint of the current building and require ground disturbance only to construct additional parking lots. Use of the Project site would remain the same as anticipated during construction of the original warehouse, and grading required for the proposed parking lots is anticipated to be minimal. Construction and operation of the Project would not exacerbate the risk of liquefaction; therefore, impacts would be less than significant.

iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Less Than Significant Impact. The Project site is flat and does not contain any slopes that pose a risk of landslide. The closest area prone to landslide is the Simi Valley West landslide zone approximately 0.28 mile south of the Project site (DOC 2020a). As previously mentioned, the Project involves renovation of an existing warehouse; and ground disturbance would be limited to grading required for new parking lots. Minimal grading for the proposed parking lots would not exacerbate the risk of landslide at the Project site. Additionally, use of the Project site would remain substantially similar to uses anticipated during the construction of the original warehouse. Impacts would be less than significant.

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

Less Than Significant Impact. Construction activities associated with the Project would require brush clearing, excavation, tree removal, and grading for the proposed parking lots. Because the Project would involve soil disturbance, and the proposed parking lot would introduce impervious surface to the Project site in excess of 1 acre; a SWPPP will be written and implemented. A SWPPP identifies BMPs to further reduce soil erosion during construction; these BMPs would be consistent with the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures (County 2011). The identification and implementation of construction BMPs would include but are not limited to watering soil, soil cover of inactive areas, gravel bags, and fiber rolls to minimize the potential impacts. Therefore, implementation of the Project would result in less than significant impacts associated with soil erosion or the loss of topsoil.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As discussed above, the Project site is not within an active fault zone but is in close proximity to earthquake faults and landslide zones in the area. The Project is also located within the Simi Valley West Liquefaction Zone (DOC 2020a). The City is underlain primarily by two types of geologic units: relatively weak semi-consolidated sedimentary bedrock in the hilly and mountainous areas and loose, unconsolidated, alluvial sediments in the valleys and canyon

bottoms (City 2001). Considering the Project involves renovation of an existing warehouse and ground disturbance would be limited to grading and excavation (up to 4 feet in depth) required for new parking lots, the risk of landslide, lateral spreading, subsidence, liquefaction, or collapse as a result of the Project is low. Impacts would be less than significant.

- d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

No Impact. Expansive soils are certain types of clay soils that expand when saturated and shrink when dried. According to the United States Department of Agriculture's (USDA) Web Soil Survey, the soils on the Project site are primarily sandy loam and riverwash, which have a high permeability (USDA 2020). The Project's Infiltration Report details that soils approximately 7 feet deep on the Project site were mainly silty fine to coarse sand with a mixture of gravel, cobbles, and little clay (SoCalGeo 2020; Appendix C). No soils were identified within the Project site that have a large clay component; thus, no impact would occur.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. The Project would involve the renovation of a warehouse facility, but the facility would be connected to the existing sewer infrastructure; therefore, the Project would not require the installation of new septic tanks or alternative wastewater disposal systems. No impact would occur.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

Less Than Significant Impact. The Department of Conservation's Geologic Map of California shows that the Proposed Project site is underlain by marine sedimentary rock from the Eocene epoch and nonmarine sedimentary rocks from the Oligocene epoch (DOC 2020b). In general, the potential for a given project to result in adverse impacts to paleontological resources is directly proportional to the amount of ground disturbance associated with the Project. The Project entails renovation of an existing warehouse, lot merger, construction of new parking lots, and landscaping improvements. Excavation and grading will be required for the proposed new parking lots associated with the Project, but this grading would only occur in highly disturbed deposits directly adjacent to SR-118 or the existing warehouse. In addition, excavation depths are not expected to encounter native soils; therefore, risk to unique paleontological resources or geological features is low. Impacts would be less than significant.

4.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As mentioned in Section 4.3, an Air Quality and Greenhouse Gas (GHG) Emissions Impact Analysis was produced for the Project by Vista Environmental in November 2020 to determine the air quality and GHG emissions impacts associated with the Project (Appendix A). The GHG emissions impacts created by the Project were analyzed through use of CalEEMod Version 2016.3.2. Results from this analysis have been summarized and incorporated below. For more details regarding methods and results, see Appendix A.

4.8.1 Impact Analysis

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

Less Than Significant Impact. The Project involves renovating an existing warehouse building into a distribution center and expanding parking on site. The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The Project would consist of development of a warehouse distribution facility. The Project is anticipated to generate GHG emissions from construction activities and from operational activities including energy usage, mobile sources, waste disposal, and water usage. The Project's GHG emissions have been calculated with the CalEEMod model based on the construction and operational parameters detailed in Appendix A. A summary of the results is shown in Table 4, and the CalEEMod model run is provided in Appendix A.

Table 4: Project Related Greenhouse Gas Annual Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Construction				
Total Construction Emissions	340.65	0.07	0.00	342.34
Amortized Construction Emissions¹ (30 Years)	11.35	0.00	0.00	11.41
Operations				
Area Sources ²	0.01	0.00	0.00	0.01
Energy Usage ³	833.25	0.03	0.01	836.43
Mobile Sources ⁴	1721.06	0.07	0.00	1,722.88
Solid Waste ⁵	23.53	1.39	0.00	58.31
Water and Wastewater ⁶	163.00	1.20	0.03	201.64
Total Operational Emissions	2,740.85	2.69	0.04	2,819.27
Total Annual Emission (Construction & Operations)	2,752.21	2.69	0.04	2,830.68
Threshold of Significance				3,000
Exceed Thresholds?				No

Notes:

¹ Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

² Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consists of GHG emissions from electricity and natural gas usage.

⁴ Mobile sources consist of GHG emissions from vehicles.

Table 4: Project Related Greenhouse Gas Annual Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e

⁵ Waste includes the CO₂ and CH₄ emissions created from the solid waste placed in landfills.

⁶ Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

Source: CalEEMod Version 2016.3.2.

The data provided in Table 4 shows that the construction activities would create 342.34 metric tons of carbon dioxide equivalent (MTCO₂e), which equates to 11.41 MTCO₂e per year when amortized over 30 years. Table 4 also shows that operational activities would create 2,819.27 MTCO₂e per year; and, when combined with the amortized construction emissions, the Project would create a total of 2,830.68 MTCO₂e per year, which is within the 3,000 MTCO₂e per year threshold that is described in Appendix A. Therefore, a less than significant generation of greenhouse gas emissions would occur from development of the Project.

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

Less Than Significant Impact. The Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. Neither the City nor the VCAPCD has adopted a Climate Action Plan or other qualified GHG reduction plan. The Southern California Association of Governments (SCAG) has incorporated a sustainable community strategy into its 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) plan, which is designed to help the region achieve its Senate Bill (SB) 375 GHG emissions reduction targets. The SCAG's 2016-2040 RTP/SCS demonstrates that the SCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. The Project would not alter the basic population projections used in the plan and would be consistent with the City's General Plan land use designation for the Project site.

The Project would be required to comply with existing State regulations for reducing GHG emissions that include Title 24 Part 6 and Part 11 energy efficiency requirements. As such, since there are no applicable local GHG reduction plans and the Project would comply with all regional (SCAG) and State regulations intended to reduce GHG emissions, the Project would be consistent with the applicable plans and programs designed to reduce GHG emissions. Impacts would be less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	and accident conditions involving the release of hazardous materials into the environment?				
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Be located on a site which 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	For a project located within an airport land use plan 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.9.1 Impact Analysis

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

Less than Significant Impact. The Proposed Project operation involves the use of the warehouse distribution center for delivery operations. The deliveries will be commercial in nature and will not involve the routine transport, use, or disposal of hazardous materials. The operation of the facility would necessitate the routine transport of potentially hazardous commercial materials, including but not limited to, gasoline, oil, solvents, cleaners, paint, pesticides, and fertilizer. Any potentially hazardous materials used or found on site would be handled in accordance with State and federal regulations regarding the transport, use, and storage of hazardous materials.

As a result, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, construction and operational impacts for these issues would be less than significant.

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

Less Than Significant Impact. Project elements would require excavation and grading operations, utility work, surface paving operations, and landscaping. Eurofins Calscience LLC conducted lab tests on samples retrieved from the Project site. The Analytical Report identified trace amounts of lead concentrations (Eurofins 2020). The Project would comply with the BMPs identified in the SWPPP to minimize potential impacts of contaminated soil. Additional BMPs that would be implemented will include but not be limited to prevention of leaks and spills, covering stockpiles with plastic sheeting or tarps, and ensuring that ground-disturbing activities do not result in visible dust during

construction. The Project shall also comply with the California Department of Public Health on identifying specific procedures pertaining to handling lead-containing materials. As the Project would involve earth-moving activities, the Applicant would sample and test soils for the presence of TACs to determine if the Project is subject to requirements of Ventura County AQMD. If TACs are found, the Applicant would comply with all relevant and appropriate requirements of Ventura County AQMD. Any potentially hazardous materials used or found on site would be handled in accordance with State and federal regulations regarding the transport, use, and storage of hazardous materials.

Use of hazardous materials during operations would be limited to the use of commercially available gasoline, oil, solvents, cleaners, paint, pesticides, fertilizer, and various other commercially available substances.

All construction and operational activities would be required to adhere to local standards set forth by the City, as well as State and federal health and safety requirements that are intended to minimize risk to the public from hazardous materials, such as California Division of Occupational Safety and Health (Cal/OSHA) requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code.

As a result, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Therefore, construction and operational impacts for these issues would be less than significant.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Less Than Significant Impact. The Project would involve the use of heavy equipment and other gas- or diesel-powered equipment that would generate emissions associated with internal combustion engines (i.e., diesel and gasoline). As described in impacts 4.9.1 a) and b) above, construction would also require the routine transport of potentially hazardous commercial materials, including but not limited to, gasoline, oil, solvents, cleaners, paint, pesticides, and fertilizer. Considering the Project is a warehouse renovation, operations at the Project site would be substantially similar to intended uses of the original warehouse building. The Project would not require an expanded use of potentially hazardous commercial materials typically used for warehouse distribution centers. While the Project does have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, the Project site is not within 0.25 mile of an existing or proposed school. In addition, the Project would be consistent with previous uses of the existing warehouse and in compliance with local regulations and standards set forth by the City, State, and federal governments. Therefore, construction and operational impacts for these issues would be less than significant.

- d) *Would the project be located on a site which 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?*

Less Than Significant Impact. A review of federal and State standard and supplemental databases indicated that the Project site is not located within an identified hazardous material site pursuant to

Government Code Section 65962.5. A hazardous material clean-up site was previously located approximately 0.25 mile away from the Project site, but the site was closed in August 1996 (SWRCB 2020; DTSC 2020). Considering the hazard case is now closed, impacts would be less than significant.

- e) *For a project located within an airport land use plan 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?*

No Impact. The Project site is located approximately 12 miles southeast of Santa Paula Airport and 14 miles northeast of Camarillo Airport (Google Maps 2020). The Project site is not within the Airport Influence Area for either of these airports (ALUC 2000). No impact would occur.

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

Less Than Significant Impact. According to the Safety Element of the City's General Plan, the City has developed an Emergency Services Program to maintain a responsible level of emergency preparedness. This program includes City staff receiving training in emergency preparedness, management, and mitigation; the City maintaining the Emergency Operations Center (EOC); the City organizing and training a Disaster Assistant Response Team composed of volunteers; and the City promoting emergency planning, training, public awareness, and education (City 2001). The EOC is the focal point for coordination of the City's emergency planning, training, response, and recovery efforts for emergencies and major disasters (City 2020a). Additionally, the County's Multi-Hazard Mitigation Plan (MHMP) includes an overview of the risk assessment process and identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County, including participating cities (such as Moorpark) and the County unincorporated areas (County 2015). The Project would not interfere with the City's Emergency Services Program or the MHMP because it would not prohibit subsequent programs or plans from being established or prevent the goals and objectives of existing plans from being carried out. The Project site is located in the vicinity of a Critical Facility for emergency response, the Career Education Center Moorpark, approximately 500 feet southwest, although the Project would not prevent access to this Critical Facility during an emergency (City 2001). Thus, impacts would be less than significant.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Less Than Significant Impact. The Project is located within the Very High Fire Severity Zone of the Local Responsibility Area (LRA). Additionally, the Project borders vegetated open space on the south and east sides. The warehouse distribution center building associated with the Project is set back from the parcel boundary and will be separated from the vegetation by parking lots, loading areas, and a 26-foot-wide asphalt fire lane. These areas provide a minimum 100-foot buffer around the warehouse distribution center structure in compliance with the Ventura County Fire Department's Fire Hazard Reduction Program. Additionally, all construction would comply with the City's Building Code Section 15.08.060 Fire Hazard Zone Requirements and the County's Fire Protection Ordinance (City 2020a; County 2013). Moreover, use of the Project site would be substantially similar to previous uses of the existing warehouse; therefore, Project operations would not exacerbate the risk of fire. Impacts would be less than significant.

4.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Drainage Study was prepared for the Project by Jensen Design & Survey, Inc. on April 9, 2020, which identifies the existing and proposed hydrologic conditions and the proposed improvements. An Infiltration Report was produced for the Project by Southern California Geotechnical on September 25, 2020. Results from the Drainage Study and Infiltration Report have been incorporated below; for more details regarding methods refer to Appendix C and Appendix D, respectively.

4.10.1 Impact Analysis

a) *Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?*

Less Than Significant Impact. Project construction would require temporary disturbance of surface soils and removal of vegetative cover through grading and excavation for the proposed parking lot. Grading activities therefore could potentially result in erosion and sedimentation on site, which may alter the existing drainage pattern. The Project site is relatively flat, so the potential for soil erosion is low, but peak stormwater runoff could result in short-term sheet erosion in areas of exposed soils.

The Project would be required to obtain coverage under a Construction General Permit to comply with NPDES requirements. Compliance with the Construction General Permit would require the development and implementation of a SWPPP and associated BMPs. The BMPs would include measures that would be implemented to prevent discharge of eroded soils from the construction site and sedimentation of surface waters off-site. Given the relatively flat topography of the site and implementation of the required SWPPP, construction of the Project would not violate any water quality standards or waste discharge requirements.

Once developed, the Project will increase the imperviousness on the site from 75 percent to 78 percent with the addition of a new parking lot on the undeveloped land to the northwest and east (Appendix C). To prevent significant impacts due to increased runoff at the Project site, catch basins will be installed throughout the site and an onsite storm drain system will convey runoff to one of four proposed underground infiltration/detention systems located on site. Outlets from these retention/detention areas will follow existing drainage patterns and outlet to the Arroyo Simi creek approximately 100 feet to the southeast (Appendix C). With implementation of these design features, Project operations would not substantially degrade surface or groundwater quality. Impacts would be less than significant.

- b) *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?*

Less Than Significant Impact. The Project site is located within the boundaries of the Groundwater Sustainability Plan (GSP) for the Las Posas Valley Basin (FCGMA 2007). The GSP projects future water demands based on historic water availability and demand, as well as buildout of the General Plan. Once the applicant obtains the CUP from the City, the Project will be consistent with the zoning and land use of the Project site. Therefore, projected groundwater demands in the GSP generally take into account water demand from the Project. Impacts would be less than significant.

According to the Infiltration Report (SoCalGeo 2020; Appendix D), the static groundwater encountered at the Project site is considered to have been present at a depth in excess of 4 feet at the time of the subsurface exploration. As discussed in Section 4.7, Geology and Soils, although the Project proposes grading activities, grading would not require excavation of 4 feet of soil or more. Therefore, it is unlikely that groundwater would be encountered over the course of construction. In the event that groundwater is encountered, minor dewatering of groundwater seepage may be necessary; however, temporary dewatering activities would not be substantial enough to induce subsidence due to groundwater withdrawal. Therefore, the Project would have a less than significant impact related to the depletion of groundwater supplies and groundwater recharge.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river 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 off-site;*
 - iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or*

Less Than Significant Impact. Project construction would require temporary disturbance of surface soils and removal of vegetative cover through grading and excavation (up to 4 feet in depth) for the proposed parking lot. Grading activities therefore could potentially result in erosion and sedimentation. The Project site is relatively flat, so the potential for soil erosion is low, but peak stormwater runoff could result in short-term sheet erosion in areas of exposed soils. Compliance with the Construction General Permit would require the development and implementation of a SWPPP and associated BMPs. Implementation of the Project will increase the imperviousness on the site with the addition of a new parking lot on the undeveloped land to the northwest and east. To prevent significant impacts due to increased runoff at the Project site, catch basins will be installed throughout the site; and an onsite storm drain system will convey runoff to one of four proposed underground infiltration/detention systems located on site. Outlets from these retention/detention areas will follow existing drainage patterns and the outlet to the Arroyo Simi creek approximately 100 feet to the southeast (Appendix C). HEC-RAS 6.0 Update 1 was used to analyze the effect of the parking lot improvements to the floodway. Based on the results of the model, the water surface would not increase at any cross section within the model; and, therefore, the floodway would not be affected (Jensen Design & Survey 2021). With implementation of BMPs and design features, Project construction and operations would not result in substantial erosion siltation, flooding, runoff, or polluted runoff. Impacts would be less than significant.

iv) impede or redirect flood flows?

Less Than Significant Impact. The Project site overlaps with the Federal Emergency Management Agency's (FEMA) mapped 100-year floodplain and 500-year floodplain (FEMA 2020). The areas that overlap with the FEMA mapped floodplain include a small portion of the parking lot to the east of the existing warehouse building on the eastern, southeastern, and southern edges of the area that will be paved. No grading or changes to the existing elevation are proposed to occur within the floodplain. The Project consists of a warehouse renovation and expansion of parking on site. The existing warehouse will remain in-place, and no new structures would be constructed that could impede or redirect flood flows. HEC-RAS 6.0 Update 1 was used to analyze the effect of the parking lot improvements to the floodway. Based on the results of the model, the water surface would not increase at any cross section within the model; and, therefore, the floodway would not be affected (Jensen Design & Survey 2021). New parking lots on site have the potential to redirect flood flows by introducing new impervious surface. To prevent significant impacts associated with redirected flood flows, catch basins will be installed throughout the site and an onsite storm drain system will convey runoff to one of four proposed underground infiltration/detention systems located on site. Outlets from these retention/detention areas will follow existing drainage patterns and outlet to the Arroyo Simi creek approximately 100 feet to the southeast (Jensen Design & Survey 2020; Appendix C). In maintaining existing drainage patterns, flood flows would not be substantially redirected with implementation of the Project, and impacts would be less than significant.

d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. As previously mentioned, the Project is located within the FEMA 100-year floodplain and 500-year floodplain. However, operations at the Project site would remain substantially similar to existing operations on site. The Project would continue to necessitate the routine transport of potentially hazardous commercial materials, but any potentially hazardous materials used or found on site would be handled in accordance with State and federal regulations

regarding the transport, use, and storage of hazardous materials. Additionally, existing structures will remain in place; no new structures would be constructed, and drainage patterns would remain the same as existing drainage patterns; therefore, the risk of pollutant release would not increase. The Project is also over 20 miles east of the Pacific Ocean and is not in the vicinity of any waterbodies that have potential to produce a seiche (Google Maps 2020). Impacts would be less than significant.

- e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less Than Significant Impact. The Project is located within the Ventura County Waterworks District 1 service area (VCPW 2020). As a result of the Project, the existing warehouse structure on the Project site will remain in-place, no new structures would be constructed, and drainage patterns would remain the same as existing drainage patterns. The Project would utilize the existing water and sewer infrastructure on site, and Project operations would remain substantially similar to previous operations. A substantial increase in groundwater extraction is not expected to result from the Project. Moreover, the Project would apply for a NPDES permit and prepare a SWPPP to reduce polluted stormwater runoff. The Project would therefore not conflict with or obstruct the Ventura County Waterworks' Urban Water Management Plan (VCWWD 2016), and impacts would be less than significant.

4.11 NOISE

11.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.11.1 Impact Analysis

- a) *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 the local general plan or noise ordinance, or applicable standards of other agencies?*

Less Than Significant Impact. The Noise Element of the City's General Plan implements goals and policies to maintain acceptable environmental noise levels to protect City residents from excessive

noise. The Noise Element establishes noise standards for single-family and multiple-family residential land uses as 65 Community Noise Equivalent Level (CNEL) for the exterior environment, 55 CNEL for the interior environment with windows open, and 45 CNEL for the interior environment with windows closed (City 1998).

Background noise, or ambient noise, is the noise level of normal and existing noise levels of a given area. In the City, the four major sources of noise are traffic on SR-118 and SR-23; traffic on arterials and local collector roadways; rail traffic on the east/west rail line bisecting the City; and commercial, industrial, and recreational activities adjacent to residential locations (City 1998). The Project is located within a developed and full operational industrial park adjacent to SR-118 and an existing rail line. The existing immediate sources of ambient noise come from SR-118, the rail line, vehicles (personal, commercial trucks, and shipping trucks) accessing Condor Drive and Princeton Avenue, operational equipment from the nearby businesses, and other outdoor noises from customers and employees. The Project would not introduce a new noise source that would result in a permanent increase in ambient noise levels because the proposed operations would be similar to the site's previous operations.

Section 17.53.070.F of the City Municipal Code prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work so as to violate the noise standards between weekday (Saturdays and legal holidays observed by the City included) hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays. During operations, Section 17.53.070.E of the Municipal Code prohibits the loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans, or similar objects between the hours of 10:00 p.m. and 7:00 a.m. any day of the week in such a manner as to cause a noise disturbance across a residential property line or at any time to violate the provisions of Section 17.53.050.

Construction of the Project would result in a temporary increase of construction noises. Proposed construction activities would be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Saturday to avoid violation of noise standards set by the City Municipal Code. Following Project implementation, the Project site will be operating 24 hours a day, 7 days a week; therefore, there is potential that loading, unloading, opening, closing, or other handling of boxes, crates or containers could occur between the hours of 10:00 p.m. and 7:00 a.m. The Project site is approximately 300 feet south of residences on Hartford Street across SR-118.

- b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Less Than Significant Impact. The Noise Element of the City General Plan implements goals and policies to maintain acceptable environmental noise levels to protect City residents from excessive noise. The Noise Element establishes noise standards for single-family and multiple-family residential land uses as 65 CNEL for the exterior environment, 55 CNEL for the interior environment with windows open, and 45 CNEL for the interior environment with windows closed (City 1998).

Section 17.53.070.F of the City Municipal Code prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work that would violate the noise standards between weekday (Saturdays and legal holidays observed by the City included) hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays. During operations, Section 17.53.070.E of the Municipal Code prohibits the loading, unloading, opening, closing or other handling of boxes, crates,

containers, building materials, garbage cans, or similar objects between the hours of 10:00 p.m. and 7:00 a.m. any day of the week in such a manner as to cause a noise disturbance across a residential property line or at any time to violate the provisions of Section 17.53.050.

Since the four-lane highway separates the Project site from sensitive receptors noise, groundborne noise and groundborne vibration levels generated from the highway would have a greater effect on the Hartford Street residences than the Project. Additional residences are approximately 0.3 mile southwest of the Project site along Avenida Colonia, but these potential receptors again are separated from the Project site by four other industrial and commercial buildings. Noise, groundborne noise, and groundborne vibration generated by the four other industrial and commercial businesses would have a greater effect on noise levels at the Avenida Colonia residences than the Project. Moreover, these residences are 100 to 200 feet from the Amtrak railroad tracks, which would intermittently generate high noise and vibration levels in close proximity. Impacts related to noise, groundborne noise, and groundborne vibration resulting from the Project would be less than significant.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public us airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The Project site is located approximately 12 miles southeast of Santa Paula Airport and 14 miles northeast of Camarillo Airport (Google Maps 2020). The Project site is not within the Airport Influence Area for either of these airports (ALUC 2000). No impact would occur.

4.12 LAND USE AND PLANNING

12.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.12.1 Impact Analysis

- a) *Would the project physically divide an established community?*

No Impact. The Project would renovate the existing warehouse on site to be converted into a distribution center. The majority of construction activities would occur within the footprint of the current building. Minimal ground disturbance would be required for construction of the proposed new parking lots on vacant land adjacent to the existing building. Implementation of the Project would not result in a change in land use or zoning, and the Project does not include features that would preclude mobility across the Proposed Project site. Construction and operational Project activities would not physically divide an established community. No impact would occur.

- b) *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?*

No Impact. The Project would involve construction of an Amazon Delivery Station, which would be considered a distribution and transportation facility according to the City's zoning ordinance. This is a conditionally allowable use in the M-1 zone with obtainment of a CUP, which the Applicant applied for in January 2020.

A Traffic Impact Study (TIS) was prepared for the Project by NV5 on December 16, 2020 in order to assess conflicts with land use policies or regulations related to traffic and circulation. The report summarizes the data collected, background and projected traffic at the study locations, analysis of traffic impacts by assessing the vehicle miles traveled (VMT), assessment of the site entrance, discussion of the levels of service (LOS) for consistency with the General Plan, and conclusions/recommendations from the analysis (NV5 2020; Appendix E).

As new traffic data could not be collected due to the present abnormal traffic conditions caused by the COVID-19 pandemic, historical turning movement count data (pre-2020) was sought for the study area intersections. The data from these counts help to establish an overall picture of the existing traffic conditions within the study area. Figure 3 of Appendix E presents the Existing Condition peak-hour volumes for these locations. It should be noted that as traffic data was obtained for 2019, all traffic volumes were increased by a compounded background growth rate of 2.1 percent for one year to account for minor changes in the traffic network between 2019 and 2020.

While VMT is the current method used to analyze a project's traffic impacts, analysis of the LOS can determine a project's consistency to the existing land uses and with the General Plan's Circulation Element (City 1992). Level of service (a rating ranging from excellent operating conditions at LOS A to failing operating conditions at LOS H) is a concept developed to quantify the degree of comfort experienced by drivers. Per City of Moorpark Guidelines for Preparing Traffic and Circulation Studies, the minimum acceptable operating standard LOS for intersections is LOS C. If the LOS for a traffic analysis location falls below LOS C attributable to traffic generated by a proposed project, additional mitigation measures must be considered to improve LOS with a proposed project. In addition, the City's Circulation Element states that "Level of service 'C' shall be the system performance objective for traffic volumes on the circulation system. For roadways and interchanges already operating at less than level of service 'C', the system performance objective shall be to maintain or improve the current level of service" (City 1992).

It should be noted that, per City of Moorpark Guidelines for Preparing Traffic and Circulation Studies, lane capacities of 1,500 vehicles per hour (vph) for left and right turn lanes and 1,600 vph for through lanes should be assumed throughout the Intersection Capacity Utilization (ICU) analysis.

A traffic analysis was conducted for future traffic conditions, including traffic anticipated to be generated by the Proposed Project, referred to as the "Build Condition" (Appendix E). Four signalized intersections are anticipated to operate with congested conditions in one or more peak hours. The intersection of Princeton Avenue/High Street and Spring Road is anticipated to continue to operate at LOS D in the weekday PM peak hour (volume/capacity ratio reduction of 0.001). Princeton Avenue and Condor Drive (North) is anticipated to continue operating at LOS E with a decrease in volume/capacity ratio of 0.026 in the weekday PM peak hour. The intersection of Princeton Avenue

and SR-118 Eastbound Ramps is anticipated to continue operating at LOS F with a reduction of volume to capacity (v/c) ratio of 0.006 in both the weekday AM and PM peak hours. The intersection of Princeton Avenue and SR-118 Westbound Ramps is anticipated to continue operating at LOS D in the weekday AM peak hour. The remaining signalized intersections operate at LOS C or better in the weekday AM and PM peak hours.

The westbound lane group at Princeton Avenue and Condor Drive (South) is anticipated to continue operating at LOS D and F with an increase of delays of 0 seconds per vehicle and 1.7 seconds per vehicle between the No Build and Build Conditions in the weekday AM and PM hours. The remaining lane groups at unsignalized intersections are anticipated to continue operating at LOS C or better in the remaining peak hours.

Per the City of Moorpark Guidelines for Preparing Traffic and Circulation Studies, an LOS degradation of one level or greater below LOS C attributable to the Project will be considered significant enough to require mitigation measures. In addition, depending on the circumstances, less than one level of LOS degradation may be considered significant as well. Based on these criteria, levels of service degradation were not identified at any study area intersections in the Existing with the Proposed Project Condition or Build condition. However, a new traffic signal at the unsignalized intersection of Princeton Avenue and Condor Drive (South) was considered, as the intersection would continue to experience failing LOS conditions in the Build Condition. As shown in Table 13 of Appendix E, the traffic volumes anticipated in the Build Condition would not warrant a traffic signal according to the Peak Hour Volume Warrant 3. Therefore, a traffic signal was not considered as appropriate mitigation at this intersection, and the intersection is anticipated to operate as described in the Build Condition section of Appendix E. The Project would not result in any changes to the existing land use at the Project site and, thus, would align with all policies in the Land Use Element of the City's General Plan and the City's zoning ordinance. No impact would occur.

4.13 MINERAL RESOURCES

13.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.13.1 Impact Analysis

- a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. According to the City's General Plan, no known mineral resources of statewide significance are within the City's limits. West and northwest of the City there are mineral resource

zones designated MRZ-2, which refers to areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists (City 1986), although these areas are outside the City limits and therefore do not encompass the Project site. Moreover, two active open-pit sand and gravel mines are approximately 1 mile north of the Project site, but no mines are reported within the Project site (DOC 2020d). No impact would occur.

- b) *Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

No Impact. The City's General Plan does not designate any locally important mineral resource recovery sites within the City boundaries (City 1986). Two active open-pit sand and gravel mines are approximately 1 mile north of the Project site, but no mines are reported within the Project site (DOC 2020d). No impact would occur.

4.14 POPULATION AND HOUSING

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.14.1 Impact Analysis

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

No Impact. The Project would occur mainly within the existing footprint of the warehouse building currently on site; and ground disturbance would result only from proposed new parking lots, installation of catch basins, and tree removal. Implementation of the Project would not result in the construction of new homes or businesses or result in the extension of roads or other infrastructure. Construction of the Project would result in the generation of temporary construction jobs; however, the additional jobs are expected to be filled by residents who currently live in the area. In addition, new jobs generated by the operation of the Amazon Distribution Facility are also expected to be filled by nearby residents; therefore, the jobs would not result in the relocation of any population. The Project would not directly or indirectly induce substantial population growth through the creation of new homes or businesses, and no impact would occur.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. As discussed above in 4.14.1 Impact a), the Project would occur mainly within the existing warehouse building with new ground disturbance associated only with the proposed new parking lots, installation of catch basins, and tree removal. The Project site does not contain any housing units; therefore, no existing housing units or people would be removed or displaced. The Project would not require the construction of replacement housing elsewhere. No impact would occur.

4.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:				
	i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.15.1 Impact Analysis

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 fire protection?*

No Impact. The Project consists of a warehouse renovation into a distribution center and construction of new parking lots. The Project would provide approximately 495 new job opportunities, but these positions are expected to be filled by the local community and would not induce permanent population growth. Additionally, Ventura County Fire Station 42 is approximately 1.5 miles southwest of the Project site or approximately a 4-minute drive (Google Maps 2020). Considering Project operations would be substantially similar to previous uses, the Project is not expected to increase the demand for fire protection or require new facilities. No impacts would occur.

b) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 police protection?*

No Impact. As previously mentioned, the Project consists of a warehouse renovation and construction of new parking lots and would provide approximately 495 new job opportunities. All new jobs are expected to be filled by the local community and would not induce permanent population growth. Further, the Ventura County Sheriff's Department is approximately 1.5 miles southwest of the Project site or approximately a 6-minute drive (Google Maps 2020). Considering Project operations would be substantially similar to previous uses, the Project is not expected to increase the demand for police protection or require new facilities. No impacts would occur.

- c) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 schools?*

No Impact. The Project consists of a warehouse renovation and construction of new parking lots and would provide job opportunities to be filled by the local community. The Project site is approximately 0.3 mile northeast of the Career Education Center Moorpark; 0.5 mile southwest of Ivy Tech Charter School; 1 mile southwest of the High School at Moorpark College; 1.75 miles northeast of the Flory Academy of Sciences and Technology and the ACCESS School; and 2 miles east of Walnut Canyon School, Union High School, and Chaparral Middle School (Google Maps 2020). The Project would not induce growth requiring the extension of existing educational services or creation of new services. The Project would not increase the demand for schools in the City. No impacts would occur.

- d) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 parks?*

No Impact. The Project consists of a warehouse renovation and construction of new parking lots and would provide job opportunities to be filled by the local community. The Project would not induce growth requiring the extension of existing or creation of new park services. The Project would not increase the demand for parks. No impacts would occur.

- e) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 other public facilities?*

No Impact. The Project consists of a warehouse renovation and construction of new parking lots and would provide job opportunities to be filled by the local community. The Project would not induce growth requiring the extension of existing or creation of other public facilities. The Project would not increase the demand for other public facilities. No impacts would occur.

4.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.16.1 Impact Analysis

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

No Impact. Four parks are within a 1-mile radius of the Project site: Mammoth Highlands Park is approximately 1 mile away; Happy Camp Canyon Park is approximately 0.75 mile away; Virginia Colony Park is approximately 0.3 mile away; and Campus Park is approximately 0.25 mile away (Google Maps 2020). The Project involves renovation of an existing warehouse and construction of new parking lots; and, therefore, use of the site would be substantially similar to previous uses of the current building. As previously mentioned, additional jobs generated by the Project are expected to be filled by residents who currently live in the area; and jobs would not result in the relocation of any population. Thus, the Project would not increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would be accelerated. No impact would occur.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The Project is a warehouse renovation project and does not involve construction or expansion of recreational facilities; no impact would occur.

4.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(c)	Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Traffic Impact Study (TIS) was prepared for the Project by NV5 on December 17, 2020. The report describes existing conditions, Project trip generation rates, and the impact of the Project on existing conditions. Due to the California Office of Planning and Research's mandate for CEQA lead agencies to implement California Senate Bill 743 by July 1, 2020, NV5 also produced a memo on January 15, 2021, analyzing VMT associated with the Project. The methodology and results from the TIS and VMT memo have been summarized and incorporated into the analysis below. For more details regarding the methods and results refer to Appendices E and F. In addition, since LOS is no longer considered a CEQA Transportation issue, the LOS analysis and results have been included in the Land Use section (Section 4.12) of this Initial Study/Mitigated Negative Declaration (IS/MND).

Delivery stations are the last mile connection between Amazon's fulfillment process and their customers. Packages are transported to delivery stations via line-haul trucks from neighboring Amazon fulfillment and sortation centers and are further sorted, picked, and loaded into delivery vehicles.

Delivery stations operate 24 hours a day, 7 days a week to support delivery of packages to customer locations between 10:30 a.m. and 9:00 p.m. At the proposed Moorpark facility, Amazon expects 14 line-haul trucks delivering packages to the delivery station each day, primarily between the hours of 10:00 p.m. to 8:00 a.m. There will be 137 onsite employees. For the purpose of this analysis, a conservative estimate that none will carpool or take transit resulted in 274 commuting vehicle trips per day.

The delivery operations primarily consist of 153 employees, resulting in 306 commuting vehicle trips per day; delivery drivers start to arrive around 9:20 a.m. Beginning at 9:50 a.m. and ending at 11:10 a.m., 153 delivery vans will load and depart from the delivery station at a rate of 50 vans every 20 minutes. The vans return to the delivery station between 7:10 p.m. and 9:00 p.m. The drivers park the delivery vans and leave using personal vehicles or public transport.

The delivery station will also use Amazon Flex to deliver packages from this location. Amazon anticipates 40 traditional passenger vehicles entering the facility staggered between 4:30 p.m. and 6:00 p.m. Flex vehicles will load and depart every 15 minutes. They will not return to the station that same day. Table 5 shows the anticipated traffic volume by vehicle type.

Table 5: Trip Generation

Traffic	Number of People	Daily Trips
Auto – Employees & Van Drivers	290	580
Delivery Vans	153	306
Autos – Flex	40	80
Line-Haul Trucks	14	28
Total:	497	994

Reference: NV5 2020 (Appendix F)

Employee Commuter Trips

The VMT memo analysis assumes that employees will live within a reasonable commuting distance of the site and likely follow the same trends as those now employed within the same area. The California Department of Transportation (Caltrans) reports a home-based-work VMT for their traffic analysis zone (3533) where this site is located of 13.96 per employee. With a total of 290 employees this would equate to a VMT of 4,048 for employee commuter trips.

Delivery Van Trips

The tenant delivers packages to zones much like the U.S. Postal Service except that the routes the vans take vary by day and are optimized for the most efficient movement. It is possible to estimate the VMT for delivery vehicles by finding the distance from the site to the furthest point within the delivery zone and multiplying by the number of vehicles bound for those zones. The furthest point within the zone is assumed to account for circuitous travel as packages are dropped off throughout a route. (As a note, not every van will travel to the furthest point within a zone). The total number of delivery vans is shown in Table 5.

Most delivery trips are within 10 to 15 miles of the site, but some are as far away as 34 miles. Since all vans leave the site and then return, the VMT is doubled to account for the returning trip. It is noteworthy that the delivery stations are located within the company's larger delivery area to consolidate deliveries in smaller geographic areas. Many customers for the new delivery station in Moorpark are already being served by another delivery station. Therefore, there is a net difference when comparing the current VMT travel to the future volume. The current VMT for delivery operations is 6,818 miles per day, while the future VMT is 7,274 miles per day. The difference is the total VMT for the delivery vans of 456 miles per day.

Flex Trips

Flex trips are made by private contractors who deliver packages. These individuals are connected via a phone application (App) and instructed when to arrive at the delivery station, and they are told how many packages they will be delivering. They are routed from the Project site to their delivery zones in the same manner as the delivery vans. The only difference is that the Flex vehicles do not return to the delivery station. It is important to note that it is not possible to account for the trips to the delivery station since, in all likelihood, the Flex drivers do not come from their homes but are most often already in the area conducting other business. Many Flex drivers work for ride sharing companies or are professional drivers.

The delivery zones are the same as the delivery vans, so the methodology for determining VMT is the same except that, because the Flex vehicles do not return to the delivery station, the VMT is not doubled. The current VMT for Flex delivery operations is 903 miles per day, while the future Flex VMT is 964 miles per day. The difference is the total Flex VMT for the delivery vans of 61 miles per day.

Line-haul Truck Trips

Line-haul truck trips are not considered in VMT calculations.

Table 6: Vehicle Miles Traveled for the Project vs. Existing VMT

Traffic	Daily Trips	Existing Delivery Station VMT	New Delivery Station VMT	Diff. between Existing and Future	VMT per Employee/day
Auto – Employees & Van Drivers	580	0	4,048	4,048	13.96 ²
Delivery Vans	306	3,892	4,152	260	
Autos – Private Carrier ¹	40	509	543	34	
Total:	926	4,401	8,743	4,342	13.16 ³

¹ Private carrier vehicle VMT is for the outbound delivery only

² Travel based on 290 commuting employees (on-site employees + drivers)

³ Travel based on 330 total personnel, including private carrier drivers

4.17.1 Impact Analysis

- a) *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?*

Less Than Significant Impact with Mitigation. Since the City does not yet have its own VMT threshold, the City is relying on the guidance provided in the Technical Advisory published by the Governor’s Office of Planning and Research (OPR) in December 2018 (the “OPR Guidance”) for purposes of evaluating the potential VMT impacts of development projects. As seen in Table 6 above, the total estimated VMT per employee per day associated with the Project is 13.16, while the existing VMT per employee per day is 13.96. In the OPR Guidance, the target for office develops is a 15-percent reduction of VMT from the existing. While this land use is not an office development (there is no OPR guidance on industrial land uses), it is generally assumed that the same reduction goal would apply to industrial land uses. If the current VMT/employee in the area is 13.96, the site would need to reduce to 11.87 miles per day. This would require the site to reduce its projected VMT of 13.16 miles per day by 9.8 percent to meet OPR guidance. Accordingly, travel demand measures will be implemented, as noted in mitigation measure MM TRA-1, below to achieve the target reduction and reduce impacts to less than significant levels.

MM TRA-1: The Applicant will implement travel demand management (TDM) strategies along with an annual reporting program for the first five years of operation to track trip reductions and employee usage of TDM workplace programs. These can help achieve a 15-percent reduction in VMT below existing levels to meet OPR’s thresholds including:

- Carpool parking
- Bike racks/employee lockers
- Informational Kiosks /web resources
- Employee Transportation Coordinators
- Carpool program promotions
- Guaranteed Ride Home programs

Based on CAPCOA documentation (CAPCOA 2010), suburban center locations can experience up to a maximum of 20 percent VMT reduction with multiple TDM measures. Even if the applicant achieves a much lower percentage of benefits due to TDM strategies, lower than CAPCOA suggested 20 percent, the Project impact can be mitigated. In other words, if the TDM strategies lead to a reduction in just 9.8 percent, then the Project impacts would be mitigated.

In addition, during construction of the Project, activities would be restricted to the Project site and would not interfere with roadway traffic. The Project would also be subject to standard conditions of approval, which require the use of flagmen, temporary signage, and traffic calming measures, if necessary, during temporary construction activities. All construction equipment would be stored on site and would also not block the roadway. Therefore, the Project would not conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities and would not otherwise substantially reduce the performance or safety features of such facilities.

With implementation of MM TRA-1, above, the Project would not conflict with any program, plan, ordinance, or policy addressing the circulation system; thus, impacts would be less than significant.

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

Less Than Significant Impact with Mitigation. Section 15064.3(b) of the CEQA Guidelines describes criteria for analyzing transportation impacts. Depending on the type of project, different thresholds of significance are applicable. Section 15064.3(b)(1) applies to land use projects, including the Project:

“Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.”

As previously mentioned above, the Project would generate a total of 8,743 VMT per day including 13.16 VMT per employee per day. However, with implementation of MM TRA-1, including various travel demand management strategies, impacts regarding VMT will be reduced to a less than significant level (Appendix F). The Project is also located approximately 0.2 mile from the Princeton Avenue and Condor Drive Moorpark City Transit bus stop on both Route 1 and 2 (City 2019). Further, the Project is approximately 0.3 mile from an on-ramp for SR-118. Due to the nature of Project operations and the Project’s proximity to a major transit stop and high quality transit corridor, as well as with implementation of MM TRA-1, impacts resulting from Project VMT would be less than significant.

- c) *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)?*

Less Than Significant Impact. The Project consists of an existing warehouse renovation and expansion of parking on site. The Project does not include any hazardous design features such as sharp curves or dangerous intersections and is compatible with surrounding uses, which are mainly industrial. Impacts would be less than significant

- d) *Would the project result in inadequate emergency access?*

Less Than Significant Impact. The Project consists of an existing warehouse renovation and expansion of parking on site. The Project's circulation system will be reviewed by the City's emergency response personnel and the City's Public Works Department to ensure that ingress and egress widths are sufficient and that the proposed circulation system would not interfere with an emergency response access route. Impacts would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

18.	TRIBAL CULTURAL RESOURCES. 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, 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:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources 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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.18.1 Impact Analysis

- a) *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, 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 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)?*

Less Than Significant Impact. The Project involves a renovation of an existing warehouse building and expansion of parking on site. The Project site is currently developed, paved, or otherwise heavily

disturbed from the construction of the existing warehouse building or the nearby SR-118. Grading associated with the Project would be limited, required only for leveling the vacant land on site in preparation for paving. No tribal cultural resources are expected to be encountered due to heavy ground disturbance previously occurring on site. Impacts would be less than significant.

- b) *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, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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?*

Less Than Significant Impact with Mitigation. As noted above, the Project site is currently developed, paved, or otherwise heavily disturbed from the construction of the existing warehouse building or the nearby SR-118. As part of Assembly Bill (AB) 52 consultation efforts, the City of Moorpark contacted tribes that had previously requested consultation and also requested a sacred lands file search from the Native American Heritage Commission (NAHC). The NAHC responded that no records of tribal cultural resources were within the Project site. In addition, the yak tityu tityu yak tihini – Northern Chumash Tribe San Luis Obispo County and Region responded that the Project is not in their homeland. The City did receive one request for consultation from the Fernandeño Tataviam Band of Mission Indians, who asked for the results of the Records Search performed for the Project site. Upon receiving the Records Search results, the Fernandeño Tataviam Band of Mission Indians provided input regarding tribal cultural resources (TCRs) at the Project site. Based on the AB 52 consultation efforts, and in order to reduce potential impacts to TCRs to less than significant, mitigation measure MM-TCR-1 below will be implemented for the Proposed Project:

MM-TCR-1: In the event that Tribal Cultural Resources are encountered, all ground-disturbing activities shall cease, the Applicant shall notify City, and the Applicant shall consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during the Project grading.

With implementation of mitigation measure MM TCR-1, impacts to Tribal Cultural Resources will be less than significant.

4.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.19.1 Impact Analysis

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or expansion of which could cause significant environmental effects?*

Less Than Significant Impact. The Project consists of a warehouse renovation and construction of new parking lots. Utilities required for the Project already exist and are operational in the current warehouse building on site. The shell of the existing warehouse is to remain during Project construction, along with the existing gas, water, sewer, electrical, and telecommunications infrastructure. A new stormwater drainage and infiltration system will be constructed on site, but this system would be installed within previously disturbed soils on the Project site. In addition, BMPs will be implemented during construction in accordance with the Project's SWPPP; and the design of the stormwater infiltration system would be in accordance with Ventura County Stormwater Quality Management Program guidelines. Impacts would be less than significant.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal dry and multiple dry years?*

Less Than Significant Impact. The Ventura County Water and Sanitation Department (VCWSD) operates and maintains water and wastewater infrastructure for the City, which is located in Ventura County Waterworks District (VCWWD) No. 1. VCWWD's water supply comes from both imported and local sources. In 2019, approximately 80 percent of VCWWD's total water supply came from the State Water Project. The State water originates in Northern California, where it is captured in reservoirs north of Sacramento and released into the Delta of the Sacramento and San Joaquin Rivers. It is transported via the 444-mile California Aqueduct to State Water Project contractors such as the Metropolitan Water District of Southern California (MWD). MWD then delivers the water to its 26-member public agencies, including Calleguas Municipal Water District (CMWD), Ventura

County's regional wholesale purveyor and the VCWWD's direct supplier. CMWD water is conveyed through the Perliter Tunnel into Simi Valley, where it is distributed through the CMWD transmission system, stored in Lake Bard, or injected into the Fox Canyon aquifer.

As discussed in Section 4.10, the Project site is located within the boundaries of the GSP for the Las Posas Valley Basin, which projects future water demands based on historic water availability and demand, as well as buildout of the General Plan (FCGMA 2007). The Project, once the CUP is approved, will be consistent with the zoning and land use of the Project site. Therefore, projected groundwater demands in the GSP generally take into account water demand from the Project. Additionally, Project operations on site would be substantially similar to previous operations, and water infrastructure on site would not change. Impacts would be less than significant.

- c) *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?*

Less Than Significant Impact. The Ventura County Water and Sanitation Department (VCWSD) operates and maintains water and wastewater infrastructure for the City, which is located in Ventura County Waterworks District (VCWWD) No. 1. The Moorpark Water Reclamation Facility (MWRF), located along California SR-118 just west of the city of Moorpark, serves the Project site. The MWRF currently receives an average of 2.0 million gallons per day and is designed to treat up to 5 million gallons per day (mgd) (VCWWD 2016). Therefore, the MWRF has an available surplus capacity of approximately 3 million gallons per day, which is sufficient to support the Project. Furthermore, Project operations on site would be substantially similar to previous operations, and wastewater infrastructure on site would not change. Impacts would be less than significant.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less Than Significant Impact. The Project consists of a warehouse renovation that would keep the existing warehouse structure and utilities; therefore, no major demolition is anticipated for the Project. Project operations would consist mainly of sorting previously packed packages for delivery, resulting in minimal waste. In accordance with Moorpark Municipal Code Section 8.36, the Project would prepare a construction and demolition materials management plan that details how the Project will divert or recycle at least 65 percent of construction and demolition material. Construction and demolition waste generated by the Project would be taken to a facility approved by the City for the diversion of construction and demolition materials within the County. Compliance with this Section of the Municipal Code would align the Project with goals set forth in AB 939 and AB 341, which state the City must divert at least 50 percent of its annual waste and set a 75-percent recycling goal for California by 2020. Solid waste resulting from the Project would be taken to the Simi Valley Landfill & Recycling Center (SVLRC). According to the County 2040 General Plan Environmental Impact Report, as of 2019 SVLRC has a permitted daily throughput of 9,250 tons per day and a remaining capacity of 88,300,000 cubic yards (County 2019). This is sufficient capacity for solid waste generated by the Project. Impacts would be less than significant.

4.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.20.1 Impact Analysis

a) *Would the project impair an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact. The Project is located within the LRA Very High Fire Severity Zone (VHFSZ) (CALFIRE 2020). As mentioned in Section 4.9 above, the City has developed an Emergency Services Program that includes City staff receiving training in emergency preparedness, management, and mitigation; the City maintaining the EOC; the City organizing and training a Disaster Assistant Response Team composed of volunteers; and the City promoting emergency planning, training, public awareness, and education (City 2001). Additionally, the County's MHMP includes an overview of the risk assessment process and identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County, including participating cities (such as Moorpark) and the County unincorporated areas (County 2015). The Project would not interfere with the City's Emergency Services Program or the MHMP because it would not prohibit subsequent programs or plans from being established or prevent the goals and objectives of existing plans from being carried out. Further, the Project site is located in the vicinity of a Critical Facility for emergency response, the Career Education Center Moorpark, approximately 500 feet southwest (City 2001). The Project operations would not prevent access to this Critical Facility during an emergency. Thus, impacts would be less than significant.

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

Less Than Significant Impact. Although the Project site is within the LRA VHFSZ, the Project is in an area with minimal elevation change and steep slopes. Santa Ana Wind Events tend to occur in the months of August, September, and October; but typically winds in the area are relatively low (NOAA 1998). The Project borders vegetated open space on the south and east sides, but the warehouse building is set back from the parcel boundary and will be separated from the vegetation by parking lots, loading areas, and a 26-foot-wide asphalt fire lane. These areas provide a minimum 100-foot buffer around the warehouse structure in compliance with the Ventura County Fire Department's Fire Hazard Reduction Program. Additionally, all construction would comply with the City's Building Code Section 15.08.060 Fire Hazard Zone Requirements and the County's Fire Protection Ordinance (City 2020a; County 2013). Moreover, use of the Project site would be substantially similar to previous uses of the existing warehouse; therefore, Project operations would not exacerbate the risk of fire. Impacts would be less than significant.

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

No Impact. The Project involves renovation of an existing warehouse building and construction of new parking lots. Although the Project is located within the LRA VHFSZ, use of the Project site would be substantially similar to previous uses on site; and current infrastructure provides sufficient access to roads and utilities to satisfy the requirements for implementation of the Project. No impact would occur.

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

Less Than Significant Impact. The Project is located within the LRA VHFSZ. The Project site is flat and does not contain any slopes that pose a risk of landslide or slope instability. The Project site is within an area of minimal elevation change; therefore, the risk of downslope or downstream flooding at the Project site is low. Impacts would be less than significant.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.21.1 Impact Analysis

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

Less Than Significant With Mitigation Incorporated. The Project site is located in an urbanized area of the City and has been previously disturbed in conjunction with on site development. The Project site currently contains a warehouse, associated paved parking lots, and vacant land. As described in Section 4.4, Biological Resources, implementation of mitigation measures MM-BIO-1 and MM-BIO-2 would address potential impacts to nesting birds. As noted under Section 4.5, Cultural Resources, and Section 4.18, Tribal Cultural Resources, no historical, archaeological, or tribal resources on site would be impacted due to the previous ground disturbance and minimal grading proposed. Nevertheless, implementation of mitigation measure MM-CUL-1 would reduce impacts to unanticipated human remains to a less than significant level by providing a process for evaluating and, as necessary, avoiding impacts to any identified resources during construction. In addition, mitigation measure MM-TCR-1 would ensure that impacts to tribal cultural resources encountered during construction are reduced to less than significant levels. Impacts would be less than significant with the mitigation incorporated for biological, cultural, and tribal resources.

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

Less Than Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impact of related projects in proximity to the Project such that impacts occur that are greater than the impacts of the Project alone. As discussed throughout Sections 4.1 through 4.20 above, it has been determined that the Project would have no impact, or impacts would be less than significant, with respect to the environmental issues. Where the Project would have no impact or a less than significant impact, it would not contribute to cumulative impacts. The Project consists of a warehouse renovation and parking expansion and is

not growth-inducing; thus, it would not contribute to the cumulative effects of population growth. Cumulative impacts associated with the Proposed Project and identified related projects would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. Effects to human beings are generally associated with air quality, noise, traffic safety, geology/soils, and hazards/hazardous materials. As discussed in the previous environmental topic areas, the Project would not result in significant impacts to human beings because the Proposed Project would not cause significant impacts to air quality, noise, geology, and hazards that would impact humans in the area. Implementation of mitigation measure TRA-1 would reduce impacts to transportation to less than significant. Adherence to regulatory codes, ordinances, regulations, BMPs, and standards listed in the document would ensure that construction and operation would not result in substantial adverse direct or indirect effects on humans. The impacts to human beings as a result of the Project would be less than significant with the mitigation incorporated for transportation impacts.

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