

Draft Environmental Impact Report Volume I

Rio del Valle Middle School Existing Campus Expansion Master Plan County of Ventura, California SCH# 2022060117

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EXECUTIVE SUMMARY

This Draft Project Environmental Impact Report (EIR) was prepared by Rio School District (RSD or the District) to evaluate potential impacts and related mitigation from construction and operation for the Rio del Valle Middle School (RDV) Campus Expansion Master Plan (proposed project) to meet the immediate educational, recreational, and support facilities needs of District students. The proposed project includes development within the expanded campus, which would include options for: new classrooms, library and media center, multi-purposed building, transportation and parking facilities, recreational facilities including a 320-meter track, flag football field, six basketball courts, baseball field, softball field, physical education (P.E.) and lunch play field, four sand volleyball courts, two soccer fields, jogging path, an athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts.

As Lead Agency for the California Environmental Quality Act (CEQA), the District has prepared this Draft EIR in compliance with State CEQA Guidelines.

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

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

Project Location

The proposed project includes the expansion of the RDV campus and related programs located at 3100 Rose Avenue in unincorporated County of Ventura. The primary access to the main campus is off Rose Avenue. The existing campus is approximately 30.2 acres, including the 20.2-acre main campus (APN 144-0-110-445) and 10 acres of active agricultural lands (a portion of APN 144-0-110-225) to the north of the main campus buildings. The proposed project would add approximately 11.1-acres to the south (a portion of APN 144-0-110-590) that the RSD proposes to develop with new educational and support facilities, resulting in an approximately enhanced 41.3-acre campus (project Site). The RSD is currently in escrow to acquire the southern campus expansion area. All three parcels (southern campus expansion area, northern campus expansion area and main campus) associated with the proposed project are proposed for annexation into the City of Oxnard. The geographic coordinates of the project Site are approximately Latitude 34° 14' 2.39" North, Longitude 119° 9' 10.61" West (Google Earth Pro 2021). Surface elevations at the project Site are approximately 92 feet above mean sea level (EDR 2021). The project Site is generally surrounded by agricultural lands and residential uses to the north, agricultural lands to the east, commercial uses (car dealerships) to the south, and residential uses to the west.

Project Description

RSD proposes to implement the RDV Campus Expansion Master Plan (proposed project) to meet the immediate educational, recreational, student safety, parking, interior traffic circulation, and support facilities needs of District students. Enrollment within the RSD has been increasing and additional facilities are needed now to accommodate the students.

The RSD is currently in escrow to acquire approximately 11.1 acres to the south of the existing campus that would extend the existing RDV campus boundary to Collins Street. This land acquisition would increase the RDV campus

area to approximately 41.3 acres. The proposed project includes development within the expanded campus which would occur in two phases, as detailed below, and would include options for: new classrooms, library and media center, multi-purposed building, transportation and parking facilities, recreational facilities including a 320-meter track, flag football field, six basketball courts, baseball field, softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, jogging path, an athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts.

The expanded campus shall provide significant health and safety improvements, additional on-Site parking, and a bus turnout lane. Six of the District's 17 buses are used for RDV student transportation during and after school programs; these buses would be housed on the southern 11.1-acre addition to the campus with the buildout of the proposed project.

On June 30, 2022, RSD buses were moved from the existing District Transportation and Parking Facility (DTPF) on Vineyard Avenue (former El Rio Elementary School) to a temporary parking facility located at Oxnard School District Transportation Center (near 516 W. Wooley Road). This temporary bus parking location will be utilized until bus parking facilities included as part of the proposed project at RDV become available. The temporary parking facility located at Oxnard School District Transportation Center is not considered part of the proposed project, and therefore is not analyzed for significant environmental impacts in this EIR. RSD would have lost access to the current DTPF on Vineyard Avenue in June 2022, regardless of the proposed project.

The existing RDV main campus includes the RDV Gymnasium (GYM) which is located adjacent to the proposed southern campus expansion area. It should be noted that the GYM is shared with the John F. Flynn Community Clinic and the Sheriff's Department as set forth and described in a Joint Use Agreement. However, the existing parking along with ingress and egress at the middle school has always been inadequate and therefore the RSD is proposing to assign overflow parking on the proposed new adjacent parking area (Parking Lot A) when school is not in session.

Existing Campus Recreational Renovations

The RSD, in order to accommodate the increasing student enrollment and associated demand on recreational fields, has processed field renovation plans and an associated parking facility replacement through the California Department of General Services, Division of the State Architect (DSA) on the existing main campus. These renovations are in progress and are slated for completion in fall 2022. As these renovations involve the repair, maintenance, and minor alteration of existing facilities; replacement or reconstruction of existing facilities; and the construction of small new and/or accessory structures, approved before this proposed project was under consideration, the RSD proceeded under a CEQA exemption for these renovations. Due to the scope of these renovations, the RSD has included these existing campus renovations with the proposed project to provide a full and complete review of cumulative impacts. These renovations are all on the existing main campus only.

The renovated facilities completed in fall 2022 will consist of a 320-meter track, flag football field, two soccer fields, and four interim basketball courts. After completion of these renovations, additional recreational renovations will be undertaken on the existing campus during Phase I, including a baseball field, softball field, an athletic restroom/storage building, and up to 10 new tennis and or pickleball courts. The RSD intends to make these renovated fields open to community use outside of school hours.

To facilitate these existing campus renovations, the existing parking lot located at the northeastern corner of the existing main campus parcel will be relocated to the northwestern corner of the existing campus, with direct access to Rose Avenue. This relocated parking facility (Parking Lot B) consists of 95 spaces (91 standard stalls and 4 accessible stalls). Parking Lot B has received necessary approvals from DSA and is currently under construction.

Phase I

The RSD proposes to annex all three parcels (southern campus expansion area, northern campus expansion area, and main campus) into the City of Oxnard during Phase I. Phase I activities for the proposed project will include improvements on the western portion of the southern campus expansion area. Per the City of Oxnard Municipal Code, Chapter 21, Article III, utility undergrounding associated with the proposed project will likely be necessary, and utility undergrounding along public rights-of-way (ROWs) will likely occur as part of Phase I. Construction will start for most of the following improvements after approval of the EIR, anticipated in December 2022. These construction activities are estimated to take 18 months. Phase I activities will also include replacement and relocation of some of the existing recreational facilities and parking within the existing main campus. To assist in alleviating parking and overcrowding issues, some of the playfields and Parking Lot B in the main campus were completed in June 2022.

The southern campus expansion area is approximately 11.1 acres in size and is located on a portion of current APN 144-0-110-590. RDV is currently in escrow to acquire the southern campus expansion area, which would extend the existing boundary of the RDV campus south to Collins Street. The current western and eastern property lines would continue southward on their current bearings, until terminating at Collins Street. Access to the project Site is proposed via driveway connections to Collins Street, from the campus Parking Lot A, and the proposed Parking Lot B off Rose Avenue. A 25-foot-wide access road will run from south to north providing a secondary point of access through the existing RDV parking area. The DTPF will consist of a 7,500 square foot (sq. ft.) maintenance building, two 1,080 sq. ft. portable buildings, 528 sq. ft. restroom, and conversion of the approximately 3,130 sq. ft. existing residential structure located on the project Site to office use by RSD Maintenance and Operations staff. The DTPF including buses, can be completely closed off from the general public or staff parking areas, allowing for enhanced security and operational options. Existing utility lines are present within the southern campus expansion area.

Upon completion of the permanent DTPF, bus and district vehicle parking will be relocated from the temporary parking facility located at Oxnard School District Transportation Center (near 516 W. Wooley Road) to this new permanent area. Parking Lot A will provide 214 standard and 10 accessible parking spaces for the RDV campus.

Utility Improvements – Electrical & Lighting

Utility undergrounding associated with the proposed project will likely be necessary, and utility undergrounding along public ROW will likely occur as part of Phase I; therefore, utility improvements associated with electrical and lighting are discussed in the Phase I text herein. Water and sewer related utility improvements associated with the proposed project is proposed for construction during Phase II and are discussed below.

Southern California Edison (SCE) currently provides electrical service to RDV. SCE will provide electrical service to the proposed southern campus expansion area via new electrical secondary connection(s) and meter(s). SCE has existing 17 kilovolt (KV) overhead primary power lines located in the Rose Avenue ROW, on the eastern side of Rose Avenue along the western Site boundary. Electrical power is supplied to the southern campus expansion area from the overhead primary power lines located in the Rose Avenue ROW by a run of overhead secondary power lines routed approximately 600 feet east from Rose Avenue and approximately 55 feet south of the north boundary of the southern campus expansion area. Electrical power is also routed from this run of overhead secondary power lines to a pole on the southern boundary of the existing main campus adjacent to the GYM building. There are two pole-mounted electrical transformers located along the run of overhead secondary power lines in the southern campus expansion area approximately 520 feet and 600 feet east of Rose Avenue. Another pole-mounted electrical transformer is located along the overhead primary power lines located in the Rose Avenue immediately adjacent to the western boundary of the southern campus expansion area approximately 280 feet south of the north boundary of the southern campus expansion area. While the southern campus expansion area is currently serviced by SCE with the existing secondary power lines, it is anticipated that service will be further extended from the existing SCE primary infrastructure, which is located on the same side of the street as RDV, to service the southern campus expansion area.

Additional Existing Campus Recreational Renovations

The RSD will undertake additional recreational renovations on the existing main campus during Phase I, including a baseball field, softball field, an athletic restroom/storage building, and up to 10 new tennis and/or pickleball courts. Opportunities for use of the recreational school facilities by the community outside of school hours is planned.

Phase II

Phase II activities for the proposed project will include improvements to the remaining eastern portion of the southern campus expansion area and the northern campus expansion area. Construction will start on the following Phase II improvements in two to five years (2024–2027). These construction activities are estimated to take 18 to 24 months.

Agricultural Learning Program (Northern Campus Expansion Area)

No land use changes to the northern campus expansion area are currently proposed as part of the proposed project. Approximately 10 acres on the northern portion of the project Site is currently utilized for agriculture and RSD plans to utilize the Site as an outdoor working farm “classroom.” This working farm “classroom” is intended to partner with other school districts, provide produce for school food services, and market the surplus produce. No utility expansion is proposed in this expansion area. An outdoor lecture area and a small, paved pathway are planned for this area. Possible fencing may be added for security. A Notice of Exemption (NOE) for the purchase and use of the northern campus expansion area for an agricultural learning program was filed and posted with the Ventura County Clerk on August 11, 2021; no challenges to the NOE were filed.

Classroom and Library/Media Center and Multi-Purpose Buildings

The proposed project includes the potential for construction of up to 12,000 sq. ft. for eight new classrooms and approximately 4,000 sq. ft. library/media center and 5,400 sq. ft. multi-purpose buildings. These improvements could accommodate a potential 250-student increase, expected to occur over a five-year period commencing at the earliest in the 2024/2025 school year.

Recreational Facilities

New school and community recreational facilities would be added including a P.E. and lunch play field, four sand volleyball courts, and a jogging path. The proposed project also includes two 1,080 sq. ft. portable classrooms for physical education. Opportunities for use of the recreational school facilities by the community outside of school hours is planned.

Utility Improvements – Water

RDV currently obtains water through three existing unique sources: The City of Oxnard, a RSD-owned and operated well, and the United Water Conservation District (UWCD). Based on future direction from prospective water purveyors, as well as RSD’s consultant’s professional judgement, the proposed project’s southern campus expansion area will obtain potable water from a new connection to the City of Oxnard water system. The anticipated point of connection would be from an existing City water line(s) located in the Rose Avenue or Collins Street ROW. An approximately 8-inch diameter water line would deliver water from the City line to the proposed southern campus expansion area. It is anticipated that the improvements proposed on the existing campus parcel will utilize connections from existing service lines. At this time, it is anticipated that the northern campus expansion area will continue to utilize agricultural water from current sources (well water).

Utility Improvements – Sewer

The City of Oxnard provides existing sewer service to RDV through an extension of the sewer main in Rose Avenue to the RDV Site. Sewer service is proposed to be provided to the southern campus expansion area via a new connection to the City of Oxnard sewer main, separate from the existing main campus sewer. The anticipated point

of connection would be on Rose Avenue or Collins Street ROW. Sewer service for new improvements on the existing main campus will be via connecting to the existing RDV sewer Point of Connection (assuming adequate capacity).

Anticipated Permits and Approvals

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

Anticipated Permits and Approvals

Agency	Permit/Approval
California Department of Education (CDE)	Approval of construction plans and Expanded Site Plan
California Department of General Services, Division of the State Architect (DSA)	Approval of construction plans and Expanded Site Plan
California Department of Toxic Substances Control (DTSC)	Approval of Preliminary Environmental Assessment (PEA) and Supplemental Site Investigation (SSI) for Southern Campus Expansion Area
Calleguas Municipal Water District (CMWD)	Annexation Request
City of Camarillo	Oxnard-Camarillo Greenbelt Modification
City of Oxnard	Annexation Request, General Plan Amendment/Pre-Zoning*, and Oxnard-Camarillo Greenbelt Modification
Los Angeles Regional Water Quality Control Board (RWQCB)	Storm Water Pollution Prevention Plan
Rio School District (RSD)	Approval of Project (Educational Specifications, Design/Construction Funding and Associated Contract Approvals), Adoption and Approval of EIR and MMRP
County of Ventura	Oxnard-Camarillo Greenbelt Modification
Ventura Local Agency Formation Commission (LAFCo)	City of Oxnard Annexation, CMWD Annexation, associated Sphere of Influence (SOI) and City Urban Growth Boundary (CURB) adjustments

*The RSD may, to the extent applicable, elect to exercise its authority pursuant to Government Code Section 53094 to overrule zoning.

Known Areas of Controversy

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

General Areas of Known Controversy

Area of Concern	EIR Section Where Topic is Addressed
Agriculture Mitigation	Section 3.2 Agriculture and Forestry Resources
Water Resources	Section 3.10 Hydrology and Water Quality Section 3.18 Utilities and Service Systems
Wastewater	Section 3.18 Utilities and Service Systems

Significant Unavoidable Impacts

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

Alternatives

Alternatives considered in this EIR include:

- No Project Alternative – This alternative assumes that improvements described for the proposed project would not be implemented. RSD would not implement any changes to the project Site that would result in changes to existing project Site or existing agricultural uses. Under the No Project Alternative, it is assumed that increases in enrollment would have to be accommodated by the two existing RSD middle schools. RSD buses would remain at a temporary parking facility located at the Oxnard School District Transportation Center (near 516 W. Wooley Road).
- Limited Expansion of Existing Middle Schools Alternative A -- This alternative assumes that improvements to existing RSD middle schools, beyond what is currently planned, would be required to address school capacity.

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

The following table provides a comparison of each alternative. The No Project Alternative would result in no or less than significant impacts to any of the issue areas except to public schools. The District would have to accommodate existing and anticipated future students at the two District middle schools in their current configurations, which could result in adverse impacts to public schools.

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

Summary of Project Alternatives

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

Notes: NI No Impact
LTS Less Than Significant
LTS/M Less Than Significant with Mitigation
S Significant and Unavoidable

Summary of Environmental Impacts

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

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Summary of Project Impacts, Mitigation Measures and Level of Impact After Mitigation
Proposed Rio del Valle Middle School Existing Campus Expansion, County of Ventura, CA
Rio School District

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.1 Aesthetics			
<i>Would the project have a substantial adverse effect on a scenic vista?</i>	<p>Less than Significant Impact. The scenic route portions of Rose Avenue are located approximately 0.5 miles south of the project Site. Due to intervening terrain and structures, including commercial and residential buildings and Highway 101, and the curvature of Rose Avenue, the project Site is not visible from the scenic route portions of Rose Avenue.</p> <p>Views of the Oxnard-Camarillo Greenbelt would primarily be from travelers on local roadways in the vicinity of the project Site including Rose Avenue and Collins Street. These are short duration viewers. Current views of the Oxnard-Camarillo Greenbelt, from Rose Avenue and Collins Street immediately adjacent to the project Site, are mostly limited to the immediate foreground due structures on the existing campus, fencing and raspberry production, including vegetation and shade structures, on the northern campus expansion area, and fencing, vehicle and farm equipment storage, residential use, and raspberry production, including vegetation and shade structures, on the southern campus expansion area. Views from Rose Avenue adjacent to the northern campus expansion area and the main campus would not change significantly: agricultural activities would continue at the northern campus expansion area as an outdoor working farm “classroom”; and the</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	improvements to the main campus would result in facilities and structures similar to existing conditions. Views from Rose Avenue adjacent to the southern campus expansion area would change from vehicle and farm equipment storage, residential use and agricultural uses to school buildings, recreational facilities, and parking. While the change would result in a small reduction of views of agricultural uses, the improvements would be harmonious with the existing middle school facilities. Therefore, the proposed project would not result in significant impacts to views of the Oxnard-Camarillo Greenbelt.		
<i>Would the project, in non-urbanized areas substantially degrade the existing visual character or quality of public views of the Site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</i>	<p>Less than Significant Impact. The existing main campus has a Ventura County General Plan land use and zoning designation of RE-20,000 SF; the northern campus and southern expansion areas have a Ventura County General Plan land use and zoning designations of AE-40 ac/MRP. Schools are prohibited within the County's AE-40 zone. However, the proposed project includes annexation into the City of Oxnard, thereby the County's land use and zoning designations would no longer be applicable to the project Site.</p> <p>The existing main campus is also within the City of Oxnard's SOI with a City of Oxnard General Plan land use designation of School. The northern campus and southern expansion areas are not within the City of Oxnard's SOI and have a City of Oxnard General Plan land use designation of Agriculture. The proposed project includes annexation into the City of Oxnard. The proposed project would require annexation into the City of Oxnard, with associated SOI and CURB growth</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>boundary amendments, all of which would require LAFCo approval. The District will process a General Plan Amendment (GPA), Pre-Zone (RZ) and an Annexation through the City of Oxnard. The proposed project will be required to be reviewed and recommended for approval to the City Council by the Planning Commission at a noticed public hearing prior to the City Council's public hearing process and final action. If the project is approved by the City Council, the City will file a Resolution of Annexation with LAFCo. Upon approval of the reorganization and sphere amendments by LAFCo and a 30-day reconsideration period, the reorganization will be recorded, and the project Site will be annexed into the City of Oxnard. The proposed General Plan land use designation is School, and the proposed zoning designation is C-R. Schools are an allowed use within the C-R zone with approval of the special use permit (Oxnard Municipal Code Section 16-257). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with zoning and conflicts with applicable zoning would be less than significant.</p> <p>Within the immediate project Site vicinity, the area can be characterized as urban with a mix of residential, school, commercial, and agricultural uses. Implementation for the proposed project would not change the character of the northern campus expansion area, which would remain agricultural, and main campus, which would remain a school use. The proposed project would change the character of the southern campus expansion area from vehicle and farm equipment</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>storage, residential use, and agricultural uses to school uses. Construction and occupation of the proposed project would change the visual character of the project Site.</p> <p>Visual impacts would result from temporary construction activities, including the presence of construction equipment, materials, and workers, at the project Site. Vehicles such as automobiles, pickup trucks, and dump trucks would be visible. Heavy equipment such as backhoes, graders, and excavators and workers would be visible during Site clearing, grading, construction, and Site cleanup. Construction equipment and activities would be seen by various viewers in proximity to the project Site, including travelers on Rose Avenue and Collins Street. Other viewers in the area include residents in the homes surrounding the project Site; however, these views are often obstructed by the existing walls and vegetation found on the west side of Rose Avenue. Construction activities would be temporary and short-term and thus would have minimal effect on aesthetics and visual quality, resulting in a less than significant impact.</p> <p>As previously stated, the northern campus expansion area will continue to be used for agriculture with a small outdoor lecture area added to the southeast corner of the northern campus expansion area parcel. Therefore, the visual character of the northern campus expansion area will remain consistent with existing conditions and no impact will occur.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>New school and community recreational facilities under Civic Center Act or by Joint Use Agreement, will be added to the main campus. While configuration of these facilities will change in comparison to existing conditions, they will be consistent with the existing school character (see Figure 2-3).</p> <p>Development of the southern campus expansion area would change the visual character of the southern campus expansion area by introducing newly designed school uses (recreational facilities, new buildings, and parking) to the area in comparison to existing conditions (a residence, vehicle and farm equipment, and agriculture) as shown in Figure 3-5 through Figure 3-8. The buildings would be one- to two-stories in height, in keeping with the characteristics of the existing school buildings. The project will be bordered by landscaping. The incorporation of landscaping would result in these features being the most visible elements along public street frontages. The visual characteristics of the southern campus expansion area would be consistent with the main campus and the developed areas surrounding the project Site. The eastern half of the southern campus expansion area will be composed of playfields as will the main campus. The playfields, in addition to the agricultural uses on the northern campus expansion area, will provide a visual segue way between the developed and agricultural environment located to the east and north of the project Site. The visual characteristics of the proposed project would be consistent with the developed areas immediately to the west and</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	south. Therefore, project impacts to visual character and quality would be less than significant.		
<i>Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</i>	<p>Less than Significant Impact. The surrounding area is an urbanized area that contains a variety of artificial lighting sources. The main campus contains lighting associated with the school and the southern campus expansion area contains lighting associated with the existing residential use.</p> <p>The proposed project would introduce new lighting to the project Site from exterior security and street lighting and from interior window spillage. Similar to existing conditions, it is anticipated that the middle school may be used in the evening for periodic school activities. This would result in some increased light and glare from vehicles entering or leaving the Site at night.</p> <p>The proposed project would include exterior lighting around the buildings, recreational uses, walkways, and parking areas as needed for adequate safety and security at night. During Phase 1, underground utilities will be added to facilitate sports lighting for the football field and one of the soccer fields. Sports lighting will be installed at these fields during Phase 2. Additional sports lighting may be added to the tennis/pickleball courts and other play fields. The exterior finish of the proposed buildings would not include any highly reflective surfaces aside from standard glass windows.</p> <p>According to the International Commission on Illumination (CIE 2003), light trespass varies</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>according to surrounding environmental characteristics. Areas that are more rural in character, and therefore have few existing artificial sources of light, are more susceptible to impacts resulting from the installation of new artificial lighting sources. In contrast, urbanized areas are characterized by a large number of existing artificial lighting sources and are thus less susceptible to adverse effects associated with new artificial lighting sources.</p> <p>In order to determine appropriate lighting standards that are reflective of the existing lighting conditions, land uses are typically categorized into one of four environmental zones. The project Site and surrounding area can be characterized as an area of medium ambient brightness (E3 environmental zone).</p> <p>Based on these environmental zones, CIE has established recommendations for limiting light trespass onto adjacent properties.</p> <p>In this setting, light trespass impacts would be considered potentially significant if illuminance¹ produced by the project would impact sensitive receptors with lighting levels that exceed 0.9 fc during pre-curfew hours (before 11:00 p.m.) and 0.2 fc during the post-curfew hours.</p> <p>The new sports lighting associated with the proposed project would be used to illuminate the activities of the football field and one of the soccer</p>		

¹ Measured in footcandles, illuminance is the intensity of light falling on a surface.

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>fields and potentially the tennis/pickleball courts and other play fields that may occur during non-daylight hours. There is the potential for the fields/courts to host evening events on a regular basis, including routine practices, games, and/or community events. It is anticipated that field lighting would be completely extinguished by approximately 10:30 p.m. at the latest. In no case would the artificial lighting elements for the field be used between 11:00 p.m. and dawn.</p> <p>Light sensitive receptors that have the potential to be significantly impacted by project lighting elements include residences, including those closest to the project Site to the west. Lighting levels are affected by distance; specifically, as one approaches the nearby residences and the distance from the proposed lighting standards increases, lighting intensity would decrease at a rate of approximately 75% for each doubling of distance. Additionally, when two lighting sources are combined, the resulting illuminance only significantly increases if the individual lighting sources have similar lighting intensity at the point of observation when viewed individually.</p> <p>The lighting levels from the proposed project will be designed to not exceed the threshold of 0.9 fc at the property line and based on similar school lighting will likely be much less or have no light trespass. The operation of the proposed lighting system would not result in significant adverse impacts related to light trespass. In urbanized locations the most common adverse effect of light trespass is disruption of sleep. Although the proposed project would potentially create spill</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>light that would result in light trespass during pre-curfew hours, lighting would be extinguished by 10:30 p.m. at the latest. Furthermore, the nearby residential areas are located in an area of medium ambient brightness and the small increase in light trespass is considered a less than significant impact.</p> <p>The proposed project would be constructed with materials and lighting that will be consistent with the lighting principles contained in the Community Design Element of the City of Oxnard General Plan (Oxnard 2011) and the Oxnard Municipal Code (Oxnard 2017), that require that all outdoor lights be designed, located, and arranged so as to reflect the light away from adjoining properties or streets. Campus lights will be shielded and directed downward to the extent feasible to minimize glare for pedestrians and drivers and to minimize spillover light. The landscaping buffers surrounding all the parking lots will also minimize and/or block campus lighting and any headlights from vehicles traveling on the project Site. While the proposed project would introduce new sources of light and glare; this change would be similar to existing light associated with the main campus, the adjacent residential and commercial uses and roads. Therefore, the proposed project would not result in a substantial source of light or glare and project impact would be less than significant.</p>		
<i>Cumulative Aesthetic Impacts</i>	Less than Significant Impact. Generally, projects located 3 miles distant or more from the project Site would not be visible within the same viewshed as the proposed project. Cumulative	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	aesthetic impacts could occur as long as the proposed project contributes to visual changes to the landscape that are visible or perceived by the public, either within the same viewpoints, or as a noticeable element in a cumulative viewing experience (e.g., a driver on a local road). The only cumulative project within the same viewshed of the proposed project, is the Enterprise Auto Rental Office (Commercial 19-500-01) at the corner of Northwest Rose Avenue and Ventura Boulevard. It would involve development of a vacant lot with an auto rental office, auto car wash, and lot for 40 rental vehicles. The project would appear cohesive with the adjacent commercial uses and parking lot and would not impact any significant scenic resource. Both this cumulative project and the proposed project would have the appearance of cohesive infill projects and would not result in a significant cumulative impact.		

3.2 Agriculture and Forestry Resources

<i>Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</i>	Significant Unavoidable Impact. The CDC FMMP identifies the 9 acres (or 90%) of the approximately 10-acre northern campus expansion area as Prime Farmland and 0.9 acres (or 9%) as Farmland of Statewide Importance (CDC 2022b). As described in Section 2.4, Project Description, no land use changes to the northern campus expansion area are currently proposed as part of the proposed project. Approximately 10 acres on the northern campus expansion area of the project Site is currently utilized for agriculture and RSD plans to utilize the Site as an outdoor working farm “classroom.” No utility expansion is proposed in this area. An outdoor lecture area and	AG-1: The District shall offer at cost the top 12 inches of the Prime Farmland and Farmland of Statewide importance soils from the southern campus expansion area for relocation to a farm site or farm sites that have lower quality soils. The cost will include suitable replacement soil, if needed for Site improvements.	Significant Unavoidable Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>a small, paved pathway are planned for this area. Possible fencing may be added for security. A Notice of Exemption (NOE) for the purchase and use of the northern campus expansion area for an agricultural learning program was filed and posted with the Ventura County Clerk on August 11, 2021; no challenges to the NOE were filed. As the proposed project would not convert the northern campus expansion area to a non-agricultural use, no significant impacts would occur.</p> <p>The approximately 20.2-acre main campus is a developed middle school campus and is identified by the CDC FMMP as Urban and Built Up Land. As the improvements to the main school campus would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, no significant impacts would occur.</p> <p>The proposed project plans to develop the southern campus expansion area with school uses including classrooms, recreational facilities, and parking facilities. The CDC FMMP identifies the 8.2 acres (or 74%) of the approximately 11.1-acre southern campus expansion area as Prime Farmland and 2.9 acres (or 26%) as Farmland of Statewide Importance (CDC 2022b). As previously described, the approximately 11.1-acre southern campus expansion area currently contains approximately 0.3-acre of residential use, 0.25-acre tenant storage yard, 0.45-acre junk vehicle storage area, 1.1-acre farm equipment storage and parking area, and a 0.3-acre farmyard. The remaining 8.7 acres of the southern campus expansion area is used for cultivation</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>organic raspberry production. Approximately 0.3 acres of the southern campus expansion area has been developed with the residence for over 28 years (Tetra Tech 2021a). It is considered unlikely that this acreage would be redeveloped to active agricultural production and therefore, these 0.3 acres are not considered farmland. An additional 2.1 acres are either being used for non-agricultural production activities or agricultural support activities for over 3 years. While these acres are not under active agricultural production, these uses could more easily be removed, and the acres returned to active agricultural production. For a more conservative analysis, these additional 2.1 acres plus the 8.7 acres under active agricultural production are considered farmland for the LESA model and the impact analysis. Therefore, this analysis considers the impacts associated with the proposed project's conversion of approximately 7.9 acres of Prime Farmland and 2.9 acres Farmland of Statewide Importance.</p> <p>A LESA was prepared for the non-residential portion of the southern campus expansion area that considered the six factors of the LESA Model: two Land Evaluation factors comprised of LCC and Storied Index ratings; and four Site Assessment factors comprised of the area's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands.</p> <p>Soils within the non-residential portion of the southern campus expansion area were identified using a custom Soil Resource Report (USDA NRCS 2022). The LCC and Storie Index scores</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>generated using the LESA model are shown in Table 3-5.</p> <p>The Size score is based on the amount of acreage of each soil class type. For an area with approximately 9.8 acres of Class 2 soils and approximately 1 acre of Class 3 soils, the score is 0 points.</p> <p>The Water Resource Availability score is based on the type of irrigation present on the project site and upon the feasibility of irrigation in drought and non-drought years, and whether physical or economic restrictions are likely to exist. As irrigation has been historically conducted at the southern campus expansion area, the Water Resource Availability score is 80 and the weighted factor score is 12.</p> <p>The Surrounding Agricultural Land Use score is based on the percentage of land in agricultural use in the area's Zone of Influence (ZOI). The ZOI is the surrounding land within one quarter mile of the area. Approximately 21% of the land in the area's ZOI is in agricultural use. When the percentage within the ZOI is under 40%, the corresponding Surrounding Agricultural Land score is 0. No lands in the area's ZOI are under a Williamson Act contract; therefore, the Protected Resource Lands score is 0.</p> <p>As shown in Table 3-6, a final LESA score ranging from 40–59 points is considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. (CDC 1997). The final LESA score for the proposed project is 52 and the Site</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Assessment subscore is less than 20 points as shown in Table 3-6. Under the CDC LESA methodology, the proposed project will not have a significant impact on agricultural land use on the project Site or ZOI.</p> <p>While the proposed project was found to not have a significant impact on agricultural land use under the CDC LESA methodology, the proposed project would involve the conversion of greater than 5 acres of Prime/Statewide Important Farmland. Under the County of Ventura ISAG criteria, the proposed project would result in a significant impact due to the conversion of important farmland to non-farmland uses.</p> <p>The City has determined that conversion of agricultural land is a project-level impact and requires a mitigation measure to offer the topsoil for removal to another farm operation, if feasible, as a partial mitigation for the loss of prime farmland impact (City of Oxnard 2012). The City has policies that encourage establishment of a farmland protection program and use of conservation easements and land banking to protect continued agricultural uses throughout the City's SOI and policies and programs that support existing agricultural buffers (such as the SOAR Ordinance) in order to reduce or slow further loss of agricultural resources, however, these policies do not offset an actual loss of farmland acreage. No additional feasible mitigation measures are currently available to reduce this impact to a less than significant level, therefore this impact would</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>remain significant and unavoidable (City of Oxnard 2009).</p> <p>Mitigation Measure AG-1 is provided to mitigate for the loss of important farmland. Nonetheless, conversion of agricultural land would remain a significant and unavoidable impact.</p>		
<p><i>Would the project conflict with existing zoning for agricultural use?</i></p>	<p>Less than Significant Impact. The existing campus has a Ventura County General Plan land use and zoning designation of RE-20,000 SF; the northern campus and southern campus expansion areas have a Ventura County General Plan land use and zoning designations of AE-40 ac/MRP. Schools are prohibited within the County's AE-40 zone. However, because the proposed project includes annexation into the City of Oxnard, the County's land use and zoning designations would no longer be applicable to the project Site.</p> <p>The existing campus is also within the City of Oxnard's SOI with a City of Oxnard General Plan land use designation of School. The northern campus and southern campus expansion areas are not within the City of Oxnard's SOI and have a City of Oxnard General Plan land use designation of Agriculture. The proposed project includes annexation into the City of Oxnard. The proposed project would require annexation into the City of Oxnard, with associated SOI and CURB growth boundary amendments, all of which would require LAFCo approval. The District will process a GPA, RZ, and an Annexation through the City of Oxnard. The proposed project will be required to be reviewed and recommended for</p>	<p>No mitigation is required.</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>approval to the City Council by the Planning Commission at a noticed public hearing prior to the City Council's public hearing process and final action. If the project is approved by the City Council, the City will file a Resolution of Annexation with LAFCo. Upon approval of the reorganization and sphere amendments by LAFCo, and a 30-day reconsideration period, the reorganization will be recorded, and the project Site will be annexed into the City of Oxnard. The proposed General Plan land use designation is School, and the proposed zoning designation is C-R. Schools are an allowed use within the C-R zone with approval of the special use permit (Oxnard Municipal Code Section 16-257). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with zoning. Impacts would be less than significant.</p> <p>The northern and southern campus expansion areas are located within the greenbelt established by the 1984 "Joint Resolution of the City Councils of the City of Camarillo and the City of Oxnard and the County of Ventura Establishing a Greenbelt Between North and South of the Two Cities." As part of the proposed project, the District is requesting that this agreement be amended. Specifically, the map is to be amended to exclude the proposed northern and southern campus expansion areas. If the requested amendment is approved by all parties (City of Camarillo, City of Oxnard, County of Ventura), the proposed project would then be consistent with this policy and the impact would be less than significant.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>The northern campus and southern campus expansion areas are also within the Ventura County SOAR boundaries and outside of the City of Oxnard SOI and CURB. While the northern campus expansion area would continue to be used for agriculture and educational purposes, the southern campus expansion area would be converted to a non-agricultural use. Both conversions would be allowed if the requested CURB amendment is approved. If the required discretionary approvals are granted, the proposed project would be exempt from the SOAR ordinance and the impact would be less than significant.</p>		
<p><i>Would the project involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?</i></p>	<p>Less than Significant Impact. The project Site is surrounded by adjacent residential and agricultural uses to the north, agricultural land to the east, commercial (car dealerships) to the south, and residential uses to the west. The agricultural land to the east is also located within the Ventura-Oxnard Greenbelt.</p> <p>As discussed above, the proposed project would not convert the northern campus expansion area or the main campus to non-agricultural uses. Indirect impacts could occur with the conversion of the southern campus expansion area from agricultural uses to school uses. This type of impact is mainly due to compatibility issues with the adjacent agricultural land still in production (City of Oxnard 2009). Potential compatibility issues may include nuisance effects to a project site from noise, dust, odors, and drift of agricultural chemicals. The adjacent agriculture uses could experience restrictions on the use of</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>agricultural chemicals, complaints regarding noise and dust, and vandalism and pilfering of crops. These conflicts could potentially result in increased costs to the agricultural operation and encouraged conversion of additional agricultural lands (including Important Farmlands) to urban uses.</p> <p>The development of the southern campus expansion area would involve the conversion of a small amount of farmland to non-agricultural uses. This area is currently surrounded on three sides by commercial, residential, and school uses. In addition, the existing main campus of the project Site has been developed with a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. The development of the southern campus expansion area would be expected to result in similar compatibility.</p> <p>The City of Oxnard 2030 General Plan contains policies intended to reduce this type of land use incompatibility including policies CD-6.1 and ER-12.11 (providing adequate agricultural buffer areas) and policy ER-12.2 (supporting right-to-farm policies).</p> <p>The County of Ventura Agriculture/Urban Buffer Policy also provides guidelines to prevent and/or mitigate agricultural/urban interface compatibility issues. Per the County of Ventura Agriculture/Urban Buffer Policy, a 300-foot setback from adjacent agricultural uses to new structures and sensitive uses is required on the non-agricultural property unless a vegetative</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>screen is installed. With a vegetative screen, the buffer/setback is a minimum of 150-feet. These guidelines apply to projects requiring discretionary approval by the county or a city where the proposed non-farming activity is abutting or on land zoned AE, OS, or RA, and the farming activity is located outside a SOI, as adopted by LAFCo. However, the proposed project includes annexation into the City of Oxnard with a proposed C-R zone, thereby the County's land use designations would no longer be applicable to the project Site. As such, these guidelines would not apply to the proposed project.</p> <p>While the County of Ventura Agriculture/Urban Buffer Policy would not apply to proposed project, the District has designed the lay-out of the proposed project in order to minimize compatibility issues with adjacent agricultural uses. The proposed project has been designed with parking and recreational facilities along the northern and eastern sides of the main campus. The southern campus expansion area will be developed with parking and recreational facilities. This design will provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east.</p> <p>In addition, as appropriate and applicable, the District will follow recommendations in <i>Farming Near Schools, A Community Guide for Protecting Children</i> (Ag Futures Alliance 2002).</p> <p>With the implementation of these policies, as appropriate, to compatibility issues impacts associated with compatibility issues, conversion</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	of the southern campus expansion area from agricultural uses to non-agricultural uses would be less than significant.		
<i>Cumulative Agriculture and Forestry Resources Impacts</i>	<p>Significant Unavoidable Impact. Buildout of the City would result in the conversion of up to 2,000 acres of important farmland including 770 acres of Prime Farmland and 1,230 acres of Farmland of Statewide Importance (City of Oxnard 2009). In the County, almost all Important Farmland categories have been on the decline. Between 1984 and 2016, Prime Farmland decreased approximately 16,000 acres (County of Ventura 2020a). The proposed project would contribute to the cumulative loss of agricultural lands within the region, specifically acres of Prime Farmland and Farmland of Statewide Importance. As discussed above, City or County policies and programs to reduce or slow further loss of agricultural resources do not offset an actual loss of farmland acreage. No additional feasible mitigation measures are currently available to reduce the project's contribution to this significant cumulative impact to a less than significant level, therefore this cumulative impact would remain significant and unavoidable.</p>	See Mitigation Measure AG-1 above.	Significant Unavoidable Impact

3.3 Air Quality

<i>Would the project conflict with or obstruct implementation of the applicable air quality plan?</i>	<p>Less than Significant Impact. The project Site is located at 3100 Rose Avenue in unincorporated County of Ventura.</p> <p>To pursue SIP requirements and improvement of air quality in Ventura County, the VCAPCD has prepared the 2016 Air Quality Management Plan (AQMP). The AQMP presents a comprehensive</p>	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>list of pollution control strategies aimed at attaining Ventura County's federal 8-hour ozone standard (for which Ventura County is in nonattainment) as required by the CAAA and the VCAPCD's Triennial Assessment and Plan Update required by the California Clean Air Act of 1988. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG) and reflected in local general plans. Thus, a proposed project that is inconsistent with a local general plan is also inconsistent with the AQMP. A proposed project would be inconsistent with a general plan if it resulted in a land use re-designation, causing a general plan amendment and an increase in population beyond what is budgeted.</p> <p>The proposed project Site is located in an unincorporated area within the Ventura County and the existing main campus is within the Oxnard region of influence. The proposed project is adjacent to residential and agricultural land to the North and a fully developed residential development to the west, agricultural land to the east, and commercial developments (car dealerships) to the south. The Ventura County General Plan land use designations for the project Site are agricultural land for the northern and southern campus expansion areas, and very low residential for the main campus. The main campus is designated as school land use in the City of Oxnard's 2030 General Plan. The proposed project would not induce population</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>growth into the area either directly or indirectly. The student population would be part of the existing and projected growth for the City of Oxnard. In general, K-12 schools accommodate growth as a result of other land use decisions in the City such as the construction of new homes or the creation of a substantial number of new jobs that encourages new people to move into the area. No housing is proposed as a part of the proposed project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all the additional staff could be hired from the existing qualified applicant pool already residing within or near the District. However, if teachers or other staff are hired outside the District area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the existing local population. The proposed project includes educational facilities that would accommodate existing and projected student enrollment in the District and the requirement for local schools to service the City of Oxnard. The proposed project would not result in population growth above what is forecasted in the 2030 General Plan and the Ventura County General Plan and in turn the 2016 AQMP. However, the proposed project requires a general plan amendment to redesignate some of the property from agriculture to school land use. Therefore, once the proposed project's land use is redesignated from agricultural land to school land use, the proposed project would not be expected to conflict or obstruct implementation of the</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area under an applicable federal or state ambient air quality standard?</i>	<p>applicable 2016 AQMP and project impact would be less than significant.</p> <p>Potentially Significant Impact During Construction. Per CEQA, a project is cumulatively considerable if the incremental effects of the project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. CEQA also prescribes that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan (e.g., air quality attainment or maintenance plan) or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located (California Office of Administrative Law 2022). The applicable attainment plan in Ventura County is the 2016 AQMP. While the proposed project would not result in a population increase and its emissions would not be beyond what is projected in the AQMP, the proposed project requires a land use redesignation from agriculture to school land use. The redesignation would accommodate anticipated growth forecasted for the City of Oxnard.</p> <p>To determine the extent to which a project will impact air quality in Ventura County, the VCAPCD has established emission significance thresholds. Since these thresholds are linked to the AQMP, an exceedance could render a proposed project as noncompliant with the AQMP and therefore as</p>	<p>AQ-1: In accordance with standard practice pursuant to the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations during project construction the contractor shall ensure that:</p> <ul style="list-style-type: none"> • All soil excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed soil areas. Watering shall be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations. • All clearing, earth moving, and excavation activities shall cease during periods of winds greater than 20 miles per hour (mph) (averaged over one hour), if disturbed material is easily windblown, or when dust plumes of 20% or greater opacity impact public roads, occupied structures, or neighboring property. 	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>having a cumulatively considerable net increase. Since the proposed project would contribute emissions to the regional air during its construction and operation, the significance thresholds established by the VCAPCD were used to determine whether the proposed project would result in significant impacts.</p> <p>Short-term Emissions. Short-term or construction emissions are typically generated by on-road (e.g., employee vehicles and vendor/delivery and water trucks) and off-road vehicles or equipment (e.g., backhoes, dozers, portable generators, and graders). Short-term emissions end once the construction phase is complete. The proposed project's construction phase consists of site preparation; grading; construction (e.g., classrooms, administrative offices; and supporting structures, soccer, football, and softball fields, and tracks), paving; and application of architectural coatings to classrooms and offices. Emissions from the construction phase result primarily from mobile on-road (e.g., workers vehicles, material, and equipment delivery trucks) and off-road sources (i.e., construction equipment). The construction equipment used for the proposed project would include air compressors, scrapers, excavators, forklifts, generator sets, pavers, rollers, rubber-tired dozers, backhoes, graders, paving equipment and welders. CalEEMod was used to calculate emissions from construction and operation of the proposed project. Emissions, including detailed data entered into CalEEMod to calculate emissions are included as Appendix B.</p>	<ul style="list-style-type: none"> • All fine material transported off-Site shall be either sufficiently watered or securely covered to prevent excessive dust. • All haul trucks shall be required to exit the Site via an access point where a gravel pad or grizzly has been installed. • Stockpiles of soil or other fine loose material shall be stabilized by watering or other appropriate method to prevent wind-blown fugitive dust. • Once initial leveling has ceased, all inactive soil areas within the construction Site shall either be seeded and watered until plant growth is evident, treated with a dust palliative, or watered twice daily until soil has sufficiently crusted to prevent fugitive dust emission. • On-Site vehicle speed should be limited to 15 mph. • All areas with vehicle traffic should be paved, treated with dust palliatives or 	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>A summary of construction emissions is presented in Table 3-11.</p> <p>VCAPCD does not have significance thresholds for construction emissions due to the fact that construction emissions occur only on a temporary basis and do not contribute to long-term air quality impacts. Thus, emissions resulting from the proposed project would not be expected to have a significant impact on the environment and no mitigation measures would be required other than what is standard and recommended. To this effect, Mitigation Measure AQ-1 provided at the end of this Air Quality Section is provided to minimize fugitive dust emissions in compliance with the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations and to minimize VOCs and NO_x in accordance with VCAPCD recommendations for construction emissions exceeding 25 pounds per day for VOCs and NO_x.</p> <p>Long-term Emissions. Long-term or operational emissions are emissions that result from activities conducted during the operation of a project (e.g., comfort heating, employee commute, student drop-off and pickup, and facility upkeep). Long-term impacts to air quality would be associated with emissions from equipment used during operation of the proposed project (e.g., commercial water heaters, space heaters, and lawn mowers) and from motor vehicles associated with school employees, student drop-off and pick-up, and vendors. Other activities that would contribute emissions during the operation of the proposed project include upkeep of structures (e.g., reapplication of architectural coatings and</p>	<p>watered a minimum of twice daily.</p> <ul style="list-style-type: none"> • Properly maintain and tune all internal combustion engine powered equipment; • Require employees and subcontractors to comply with the CARB idling restrictions for compression ignition engines; and use California ultra-low sulfur diesel fuel; use construction equipment with Tier 2 engines; and use interior and exterior paint with a VOC content of 100 grams per liter. 	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>patching of paved surfaces). Detailed CalEEMod input parameters, used for calculating emissions, and emissions results are provided in Appendix B. Emissions resulting from operation of the proposed project are summarized in Table 3-12. Emissions resulting from the operation of the proposed project are below the thresholds of significance established by VCAPCD to support attainment of federal standards. Therefore, the proposed project would not be expected to violate any air quality standard or contribute substantially to an existing or projected air quality violation and would have less than significant impact on air quality.</p> <p>As identified in Table 3-12, the proposed project would not violate an air quality standard, nor would it contribute substantially to an existing or projected air quality violation. Therefore, project impact would be less than significant.</p> <p>Since the proposed project's long-term emissions are less than established thresholds of significance, and its land use is not anticipated to provide for increase population growth above what is forecasted in the Oxnard and Ventura County General Plans, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment. Therefore, the proposed project would have less than significant cumulative impacts.</p>		
<i>Would the project expose sensitive receptors to substantial pollutant concentrations?</i>	Less than Significant Impact. The project Site is adjacent to agricultural land and residential units to the north; agricultural land to the east;	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>commercial land (car dealerships) to the south; and residential units to the west. The proposed project is a public school that qualifies as a sensitive receptor (i.e., a facility serving populations likely to suffer adverse health effects from pollution, such as children and the elderly). The location of the project Site is not expected to expose students to sources of substantial pollutant concentrations (e.g., industrial facilities emitting odorous or hazardous substances). Adjacent agricultural land use is consistent with the City of Oxnard and Ventura County General Plan, and agricultural operations are not expected to expose receptors (e.g., school staff and students to substantial pollutant concentrations). In accordance with Goal CD-6 of the Oxnard General Plan, the proposed project includes a buffer between agricultural fields and classrooms in the form of soccer, baseball, softball, and football fields, as well as tennis courts and parking lots.</p> <p>During construction, construction activities would generate particulate matter emissions resulting from the combustion of diesel fuel by construction equipment. Construction emissions would be temporary and would cease once the proposed project is constructed and construction activities are completed. The VCAPCD has neither adopted nor recommended methodology for assessing health risk analysis associated with mobile sources at construction sites. The Office of Environmental Health Hazard Assessment (OEHHA), in its Guidance Manual for Preparation of Health Risk Assessments associated with</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	stationary sources, recommends that a 30-year exposure duration be used as the basis for estimating cancer risk at the maximum exposed individual resident in the Hot Spots Program and the 9- and 70-year cancer risk as supplemental information (OEHHA 2015). The Hot Spot Program is aimed at stationary (as opposed to temporary construction) sources and long-term exposure construction of the proposed project would not result in long term exposure to nearby residents. Therefore, construction activities associated with the proposed project are expected to have a less than significant impact on sensitive receptors or nearby residents.		
<i>Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</i>	Less than Significant Impact. While the proposed project would be adjacent to agricultural fields, the types of crops grown at these fields are not anticipated to create objectionable odors. Additionally, VCAPCD Rule 51 (Nuisance) exempts odors emanating from agricultural operations necessary for the growing of crops from being classified as nuisance. This exemption is consistent with the California Health and Safety Code (HSC) Section 41705. Emissions from construction equipment will be temporary and are not listed as odorous sources in the Guidelines. Thus, odor emissions from construction operations are not expected to have an adverse impact on receptors in nearby businesses and housing. Operation of the proposed project is not expected to create objectionable odors since its primary function is to provide educational services. Based on this analysis, the proposed project is not expected to result in objectionable	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	odors affecting a substantial number of people and project impact would be less than significant.		
<i>Cumulative Air Quality Impacts</i>	Less than Significant Impact. The proposed project would result in significant cumulative impacts if it exceeded daily thresholds of significance established by VCAPCD or if it incurred in an increase of emissions beyond what is planned in the City of Oxnard or Ventura County. As noted above, the proposed project would not result in significant cumulative impacts since it does not exceed daily thresholds of significance established by VCAPCD or result in an increase in emissions beyond what is planned in the City of Oxnard or Ventura County General Plans and thereby the applicable AQMP. Thus, proposed project contribution toward cumulative impacts would be less than significant.	No mitigation is required.	Less than Significant Impact

3.4 Biological Resources

<i>Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?</i>	Potentially Significant Impact During Construction. The project Site is located within an urban area in unincorporated County of Ventura and is not located within or directly adjacent to any known or mapped wildlife corridors or nursery sites. Accordingly, the potential for candidate, sensitive, or special-status species or habitats is low within City limits. The project Site is currently used as an existing middle school campus and for cultivation of row crops (red raspberry). A query of the CDFW CNDDDB was conducted to determine the known locations of any special-status species or habitats (sensitive, threatened, endangered, rare, or candidate species) within and surrounding the	BIO-1: Construction activities involving vegetation removal or ground disturbance shall be conducted between September 16 and January 31, outside the typical nesting season for birds in the region. If vegetation removal or ground disturbance must occur during the typical nesting season (February 1 – September 15), a qualified biologist shall conduct a preconstruction nesting bird survey for active nests for areas that will be subject to ground	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>project Site (CDFW 2022). This included Oxnard, located within the Oxnard quadrangle, and the six adjacent quadrangles (Table 3-13). The wildlife species presented in Table 3-13 are those with any chance of potentially occurring within or adjacent to the project Site based on regional occurrence and habitat present on Site.</p> <p>Due to the active use of the project Site as a middle school campus and agricultural land, there is no potential for special-status plants to occur on Site and it is unlikely that any special-status wildlife species would occur. The agricultural land in the northern campus and southern campus expansion areas is often covered with shade covers, which reduces the potential for ferruginous hawk (<i>Buteo regalis</i>), white-tailed kite (<i>Elanus leucurus</i>), and American peregrine falcon (<i>Falco peregrinus anatum</i>) to find prey on Site. Therefore, the potential for these species to occur on Site is low. Due to the probable use of pest and weed control methods associated with active agricultural land and the presence of shade covers, seeds, insects, and desirable habitat for California horned lark (<i>Elanus leucurus</i>) is minimal, therefore the potential for horned lark to occur on Site is low. The western mastiff bat (<i>Eumops perotis californicus</i>) and pallid bat (<i>Antrozous pallidus</i>) could potentially roost in school buildings or adjacent farm buildings, or in the mature trees on Site; however, the potential for roosting to occur on Site is low, as this is not the preferred roosting habitat of these species, and these bat species are not highly tolerant of urban areas. Crotch bumble bee (<i>Bombus</i></p>	<p>disturbance, vegetation removal, and/or construction noise. The survey shall be required within 7 days of commencement of construction activities if they occur in the bird nesting season. The survey shall occur within the Site and a 250-foot buffer area around the Site, access permitting, which will include any adjacent trees. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. If birds are found to be actively nesting within the project Site or within 250 feet of the work area, an appropriate exclusionary buffer around the active nest shall be established by the qualified biologist. The buffer distance will be determined based on the nesting species. No construction activities would be allowed within the buffer until the birds have fledged from the nest or until the qualified biologist determines that the nest is inactive. At a minimum, a qualified biologist would visit an active nest weekly to determine</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p><i>crotchii</i>) could potentially nest underground in abandoned small mammal burrows, which were observed at the project Site. However, the project Site and adjacent areas lack potential nectar sources, such as plants in the <i>Medicago</i>, <i>Phacelia</i>, <i>Clarkia</i>, and <i>Eriogonum</i> genera. Therefore, potential for crotch bumble bee to occur on Site is low.</p> <p>Agricultural land can be considered suitable habitat for burrowing owl (<i>Athene cunicularia</i>), dependent upon the presence of burrowing mammals or suitable surrogate burrows. The nearest CNDDDB burrowing owl occurrence is approximately 3 miles from the project Site at the Camarillo Airport from 2009 and 2010. These observations were likely wintering owls since burrowing owls rarely breed in coastal areas, including Ventura County. California ground squirrels, burrows, and potential burrow surrogates (e.g., pipes) were observed at the project Site during the general biological survey, including burrows observed along the fenceline between the school recreational areas and the agricultural lands. Burrowing owls are generally not tolerant of recreational areas and urban sites subject to human disturbance (Moroni et al. 2017); therefore, the potential for burrowing owl to occur on the project Site is low. While the potential for burrowing owl to occur on-Site is low, burrowing owl may attempt to colonize an area that would be impacted by the proposed project if suitable burrow habitat becomes available prior to commencement of construction activities. Therefore, use of heavy machinery, and/or</p>	<p>the status of the nest. Only when the nest becomes inactive (nestlings have fledged) will the buffer and biological monitoring no longer be needed. The results of the preconstruction nesting bird survey and any required monitoring shall be submitted in a letter report to the City of Oxnard.</p> <p>BIO-2: A preconstruction survey for burrows and burrowing owl shall be conducted by a qualified biologist prior to the use of heavy machinery and/or ground disturbance or removal of vegetation associated with construction activities. The survey shall be required within 5 days prior to the commencement of construction activities and shall occur within the Site and a 150-foot buffer area around the Site, access permitting. The burrowing owl preconstruction survey shall be performed in the early morning or late afternoon in accordance with the guidelines described in the <i>CDFW Staff Report on Burrowing Owl Mitigation</i> (CDFW 2012). If construction activity as defined above halts for a period of 7 days or more,</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>significant ground disturbance during construction activities has the potential to disturb burrowing owl, if present.</p> <p>Aside from the species presented in Table 3-13, while unlikely, special-status bird species that do not necessarily have documented regional occurrences near to the project Site could occur. These species would be considered transients and would not be expected to have long term use of the project Site.</p> <p>The stand of mature oak trees in the eastern portion of the existing main campus and other vegetation and structures within and adjacent to the project Site have the potential to serve as habitat for nesting birds. One large inactive stick nest was observed in a eucalyptus tree at the southern boundary of the existing main campus during the general biological survey. The general biological survey was conducted outside the nesting season, which is why this nest was observed to be inactive. The proposed project would avoid impacts to the stand of mature oak trees in the eastern portion of the existing main campus; however, the proposed project may require the removal of other trees on Site as part of the facility updates and campus expansion. Therefore, direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds, including special-status bird species, if present. With implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3, proposed project impacts to special-status species would be reduced to less than significant.</p>	<p>the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. Should an occupied burrow and/or occupied burrow surrogate (identified by the presence of sign [e.g., whitewash, pellets, feathers, etc.] or actual observation of a burrowing owl individual) be identified on Site or within the 150-foot project Site buffer, no construction work can occur, and the CDFW shall be contacted immediately to develop and implement a mitigation plan to protect burrowing owls. The burrowing owl survey can be conducted in conjunction with the nesting bird survey, if timing is appropriate.</p> <p>BIO-3: Any construction materials stored on-Site that could serve as a burrow surrogate for burrowing owl, such as sedentary above ground pipes or sedentary rip rap, shall be covered when not in use as to not attract burrowing owls to the project Site.</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 1 to September 15.		
<i>Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</i>	Potentially Significant Impact During Construction. The project Site is located within a developed urban environment. The project Site is not located within, or directly adjacent to, any known or mapped wildlife corridors or nursery sites; the Santa Clara River is the nearest established Habitat Connectivity and Wildlife Corridor and is approximately 1.5 miles northwest of the project Site (Ventura County 2019). Developed land separates the Santa Clara River from the project Site so wildlife using the river for migration would not have a direct connection to the Site. The stand of mature oak trees in the eastern portion of the existing main campus, and other vegetation and structures within and adjacent to the Site have the potential to serve as habitat for nesting birds. During the general biological survey, one large inactive stick nest was observed in a eucalyptus tree at the southern boundary of the existing main campus. The proposed project would avoid impacts to the stand of mature oak trees in the eastern portion of the existing main campus; however, the proposed project may require the removal of other trees on Site as part of the facility updates and campus expansion. Therefore, direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds if present. With implementation of Mitigation Measure BIO-1,	See Mitigation Measure BIO-1 above.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	proposed project impacts to the movement of any native resident or migratory wildlife species, established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 1 to September 15.		
<i>Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</i>	No Impact. The proposed project includes facility updates and expansion that may require the removal of trees on the Site. However, the proposed project would avoid impacts to the mature oak trees present in the eastern portion of the existing main campus. The City of Oxnard does not have a tree preservation policy or ordinance; however, the City's urban landscape is considered an important aesthetic resource (City of Oxnard 2006). Additionally, local agencies, such as the City of Oxnard Planning Department, aid in the protection and preservation of sensitive natural resources by exercising land use controls. The Background Report of the City of Oxnard's 2030 General Plan Program EIR (City of Oxnard 2009) combined with other General Plan Elements and the 2017 City of Oxnard CEQA Guidelines, strive to achieve this control in defining certain goals and policies for the conservation of sensitive natural resources. Any tree removal activities performed as part of the proposed project will be performed in compliance with City requirements, including the City's Landscape Standards (City of Oxnard 1988). Therefore, the removal of trees would not conflict	No mitigation is required.	No Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	with any local policies or ordinances protecting biological resources, and no impact would result.		
<i>Cumulative Biological Resources Impacts</i>	Less than Significant Impact. Cumulative impacts are incremental effects of an individual project when combined with effects of past, current, and potential future projects. Because the project Site is an active middle school campus and agricultural land with very little natural habitat within or surrounding the project Site and would be infill of development within an urban area, cumulative impacts to biological resources would be less than significant.	No mitigation is required.	Less than Significant Impact
3.5 Cultural Resources			
<i>Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?</i>	Potentially Significant Impact during Construction. The records search and NAHC sacred lands search did not identify any known historical resources within or adjacent to the project Site. The historic map and aerial review and Phase I archaeological survey did identify two historic era-built environment resources: the RVD buildings and infrastructure and a residential building constructed between 1947 and 1967. These resources are unrecorded and have not been evaluated for significance eligibility as historical resources under CEQA. Project design indicates a modification to the existing RVD and residential building at 2600 N Rose Avenue, Oxnard, California. It is recommended that a qualified architectural historian assess whether the project will have a potential significant impact to these historic era resources. Incorporation of Mitigation Measure CUL-1 would reduce the	CUL-1: Built Environment. Prior to construction of the proposed project, the project owner shall retain a Secretary of Interior qualified architectural historian to assess whether the proposed project will have a potential significant impact to the historic era RDV buildings and infrastructure, and the existing residential building at 2600 Rose Avenue, Oxnard, California.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	potential impact on historical resources to less than significant.		
<i>Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5</i>	Potentially Significant Impact during Construction. The records search, NAHC sacred land search and Phase I archaeological survey did not identify any archaeological sites within or adjacent to the project Site. As discussed above, there is a low to low-moderate potential for the proposed project to impact previously unknown, buried archaeological deposits. The proposed project includes some level of ground disturbance (approximately 1 to 5 feet in depth) and there is a potential that archaeological resources could be unearthed. In the event that unknown archaeological resources are discovered during project construction, significant impacts could occur. Incorporation of Mitigation Measure CUL-2 (Worker Environmental Awareness Training) and CUL-3 (Inadvertent Discovery Plan) would reduce the potential impact on archaeological resources to less than significant.	CUL-2: Cultural Resource Worker Environmental Awareness Training. Prior to any proposed construction ground disturbing activities within the project Site, the RSD Project Manager shall require the construction contractor to provide for all non-cultural resources personnel to be briefed, by a Secretary of Interior qualified project archaeologist (retained on-call by construction contractor) about the potential and procedures for an inadvertent discovery of precontact, tribal, and historic era cultural resources. In addition, the training will include established procedures for temporarily halting or redirecting work in the event of a discovery, identification, and evaluation procedures for finds, and a discussion on the importance of, and the legal basis for, the protection of archaeological resources. Personnel will be given a training brochure/handout regarding identification of cultural resources, protocols for	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
		<p>inadvertent discoveries, and contact procedures in the event of a discovery. If requested, a local tribal representative(s) shall be invited to participate in the environmental training to discuss or provide text from a tribal cultural perspective regarding the tribal cultural resources within the region.</p> <p>CUL-3: Inadvertent Discovery Plan. Prior to any proposed construction ground disturbing activities within the project Site, the District Project Manager shall require the construction contractor to retain a Secretary of Interior qualified archaeologist to prepare an Inadvertent Discovery Plan for the proposed project. The Inadvertent Discovery Plan will provide protocols and notification procedures in the event of an inadvertent discovery. During Project construction (e.g., ground disturbing activities such as vegetation removal, excavation, trenching, grading), should subsurface archaeological precontact, tribal, or historic-era cultural resources be discovered, all ground disturbing</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
		<p>activities within 50 feet of the find shall cease and the qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the implementing agencies and any local consulting Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Under CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, Project reroute or redesign, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
		consultation with the implementing agency and any local consulting Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as a historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2. Existing regulations require that if human remains and/or cultural items defined by HSC, Section 7050.5, are inadvertently discovered, all work in the vicinity of the find would cease and the Ventura County Medical Examiner (805-641-4400) would be contacted immediately. If the remains are found to be Native American as defined by HSC, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours.	
<i>Would the project disturb any human remains, including those interred outside of dedicated cemeteries?</i>	Potentially Significant Impact during Construction. There is no indication, either from the SCCIC record search and literature review results, or the NAHC SLF results, or the Phase I archaeological survey, that any particular location within the project Site has been used for human	See Mitigation Measures CUL-2 and CUL-3 above.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>burial purposes in the recent or distant past. In the event that human remains are inadvertently discovered during project construction activities, existing state laws will be implemented as discussed below.</p> <p>California state law requires all project excavation activities to halt if human remains are encountered and the County Coroner must be notified. Any discovery of human remains on the project Site would be treated in accordance with PRC Section 5097.98 and Section 7050.5 of the State HSC. Pursuant to State HSC §7050.5, if human remains and/or cultural items defined by the HSC, Section §7050.5, are inadvertently discovered during construction activities, all work within a 100-foot radius of the find or an area reasonably suspected to overlie adjacent remains (whichever is larger) will cease, the find will be flagged and protected for avoidance, and the Ventura County Medical Examiner (805-641-4400) will be contacted immediately. The remains must be securely protected, and project personnel must ensure confidentiality of the find on a need-to-know basis and ensure that the remains are treated with dignity, not touched, moved, photographed, discussed on social media sources (e.g., Facebook, Twitter, etc.), or further disturbed. If the remains are found to be Native American as defined by HSC, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours. The NAHC shall designate the Most Likely Descendent (MLD) for the remains as stipulated by California PRC Section 5097.98. The MLD(s), with the permission of the landowner and/or</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>authorized representative, shall inspect the site of the discovered remains and recommend treatment regarding the remains and any associated grave goods. The MLD shall complete their inspection and make their recommendations within 48 hours of notification by the NAHC. Construction will not proceed within the 100-foot area (or protected area) around the discovery until the appropriate approvals are obtained. Work may be delayed in the vicinity of the human remains up to 30 days.</p> <p>The specific State law/regulations regarding proper handling of previously unknown human remains encountered during construction are specified above and the project will comply with the state law/regulations to avoid significant impacts on human remains. In conjunction with the training and inadvertent protocols identified in Mitigation Measures CUL-2 and CUL-3, potential impact to unknown human remains is less than significant.</p>		
<i>Cumulative Cultural and Tribal Cultural Resources Impacts</i>	<p>Potentially Significant Impact during Construction. Based on the cultural resource study (Tetra Tech 2022a), the project Site is within the coastal and Oxnard Plain region that has been inhabited from precontact through the historic era resulting in various types of human land use. For the analysis, the geographic scope for cumulative cultural resources impacts is considered the City of Oxnard within the Oxnard Plain. This geographic scope for the analysis is appropriate because the cultural resources within this area are expected to be similar to those that might occur on the project Site due to the regional proximity and</p>	Refer to Mitigation Measures CUL-1, CUL-2, and CUL-3 above.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>similar environments, landforms, and hydrology that would result in similar land-use and thus, resource types. Hence, this area is suitable to encompass any effects of the proposed project on cultural resources that may combine with similar effects caused by other past, current, and reasonably foreseeable future projects, and provides a reasonable context wherein cumulative actions could affect cultural resources.</p> <p>Development of the proposed project, in combination with other cumulative projects in the area, has the potential to contribute to a cumulatively significant cultural resources impact due to the potential loss of historical resources, archaeological resources, and human remains unique to the region. However, mitigation measures are included in this EIR to reduce potentially significant impacts to unknown historical/archaeological resources and human remains that could be encountered during construction of the proposed project. Implementation of Mitigation Measures CUL-1 through CUL-3 and existing state laws regarding human remains would reduce the proposed project's incremental potential impacts to historical resources, archaeological resources, and human remains to a less-than-significant level and ensure that proposed project impacts to cultural resources are not cumulatively considerable.</p> <p>With implementation of the three mitigation measures and existing state laws, as described above, the proposed project would not result in significant impacts to cultural resources. Given</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	this minimal impact, as well as similar mitigation requirements for other projects in the City of Oxnard, the proposed project's incremental effect is not cumulatively considerable when viewed in connection with the effects of other closely related past projects, the effects of other current projects and the effects of probable future projects and thus cumulative impacts to cultural resources would be less than significant.		

3.6 Energy

<i>Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</i>	<p>Less than Significant Impact. The proposed project is intended to provide educational services needed for existing and future students in the neighboring area. The proposed project is adjacent to agricultural land to the north and a fully developed residential development to the west, housing development and an elementary school to the east, and housing and commercial developments to the south. The proposed project is designed to comply with California requirements for energy conservation standards codified in CCR Title 24, Part 6. This means the following steps will be taken:</p> <ul style="list-style-type: none"> • Buildings will comply with energy efficiency standards; • All new appliances will adhere to energy and water efficiency standards; and • Photovoltaic energy generation panels will be incorporated into the project design. <p>In addition, the City of Oxnard's General Plan and EAP requirements will be followed, as described in Table 3-14.</p>	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>The middle school expansion will continue to serve a stable student population, and the expanded middle school is designed to accommodate up to an additional 250 students, a potential increase of approximately 30% over the current population.</p> <p>Short-Term Energy Use</p> <p>The construction phase is temporary, and it ends once the proposed project is built and construction activities are completed. During the construction phase energy consumption will result primarily from fuel used to power off-road construction equipment, trucks delivering and removing various materials, and vehicles used by employees to travel to the job Site. In addition, fuel use by the bus fleet serving the District's student transportation needs will continue while operating out of the temporary facility at 516 W. Wooley Road.</p> <p>Construction equipment and trucks would be subject to applicable regulations which include anti-idling measures and use of efficient engines. These measures would prevent the unnecessary use of energy by inefficient equipment. Buses are already in use by the RSD under current conditions. A slight increase in fuel use may result from the use of the temporary facility to park and maintain buses. However, this will be a small amount compared to that needed to continue the bus routes, and since this service is necessary, the temporary increase is not considered wasteful or inefficient.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Therefore, no aspects during construction of the proposed project have been identified to result in any unnecessary use of energy. Thus, the construction of the proposed project is not anticipated to result in wasteful, inefficient, or unnecessary use of energy.</p> <p>Long-Term Energy Use</p> <p>The proposed project will require energy to conduct daily operations. Energy consumption at the project Site will result from the use of electricity and natural gas to power various assets including appliances, equipment, light fixtures, landscape controls and equipment. Energy consumption will also result from vehicles such as delivery trucks, school buses, and personal vehicles used by school staff or by parents to drop off and pick up students.</p> <p>The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient light-emitting diode (LED) lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The proposed Site parking lot and pathway pole-mounted lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>proposed project will be an energy-efficient type complying with the most recent energy code.</p> <p>Energy use by the proposed project was calculated using CalEEMod and would occur at a rate of 3.33 giga British Thermal Units per year for natural gas use and 1.45 gigawatt-hours per year for electricity use. By implementing CEC-compliant design features into the expanded middle school facilities and following City of Oxnard goals and objectives in executing the proposed project, energy use per student is expected to decrease.</p> <p>Actual vehicle fuel use comparisons for the current facilities, including the RDV Middle School and the District Transportation and Parking Facility, are not possible, as data for such calculations are not available. Instead, this evaluation considers current and projected transportation modes to infer potential energy use changes. Under current conditions the RDV student population arrives at school on a bus or via a self-transport mode (as a pedestrian, on a bicycle, or dropped off from a vehicle). The same will be true after the proposed project is completed and the expanded middle school facilities commence operations. There is no reason to project that the percentage of each mode will change after the proposed project is completed, so this evaluation of potential impacts to energy (fuel) use considers the likely change in efficiency of each mode. Furthermore, walking or riding a bike to school does not use fuel, so neither is a concern of this evaluation. Therefore, only vehicle transport (self-transport mode) and District-</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>provided transport (bus mode) of students are considered.</p> <p>The new DTPF that will be co-located with the expanded middle school facility, will create a separate entrance for bus traffic, both to access the parking/maintenance area and to drop off or pick up students (Stantec 2022b). This will improve the efficiency of the drop-off and pick-up processes for both bus traffic and vehicle traffic. Improved efficiency in these processes translates directly into a smaller amount of fuel used per student per day under proposed conditions. In addition, because the new bus facility will be co-located with RDV Middle School, an efficiency in the total length of bus trips should be realized for the six daily bus trips for the students of RDV Middle School. The remaining 24 bus trips serving the rest of the RSD should at least not increase due to the new facility location and may in fact decrease because the new facility is more centrally located within the RSD. Therefore, the expected energy use per student, is expected to decrease with the expanded middle school facility.</p> <p>No aspects of the proposed facility operations of the completed project have been identified to result in unnecessary use of energy. Therefore, none of the projected facility operations are expected to cause wasteful, inefficient, or unnecessary consumption of energy resources and project impacts would be less than significant.</p>		
<i>Would the project conflict with or obstruct a state or local plan for</i>	Less than Significant Impact. The proposed project design is consistent with California energy conservation standards codified in CCR Title 24,	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>renewable energy or energy efficiency?</i>	Part 6 and also with the City of Oxnard EAP (which implements 2030 General Plan goals and strategies, see Table 3-13). Thus, the proposed project is not anticipated to obstruct a state or local plan for renewable energy or energy efficiency, either in the short term or in the long term and project impacts would be less than significant.		
<i>Cumulative Energy Impacts</i>	Less than Significant Impact. Energy use by the proposed project will contribute to energy use by existing and future users (e.g., housing and businesses). Significant cumulative impacts on energy use would result if operation of the proposed project and existing and future projects incur inefficient and wasteful uses of energy. As mentioned above, the efficient use and reduction of energy use is closely related to air and greenhouse gas reductions. Thus, efforts to curtail air emissions and GHG in many ways contribute to the efficient use and reduction of energy consumption. The proposed project is designed to comply with California requirements for energy conservation standards codified in CCR Title 24, Part 6 and is not expected to have significant cumulative impacts resulting in wasteful and inefficient use of energy.	No mitigation is required.	Less than Significant Impact

3.7 Geology and Soils

<i>Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:</i>	Potentially Significant Impact. The <i>City of Oxnard General Plan Draft Background Report</i> (City of Oxnard 2006) indicates that even though the historic record indicates that no strong earthquakes or surface displacement have occurred along the faults in southern Ventura	GEO-1: The building design for structures at the proposed project shall use geotechnical building design recommendations that are in conformance with the 2019 CBC	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
i) Strong seismic ground shaking?	<p>County in the Site area, the likelihood of the occurrence of one or more of such events within the next 50 to 100 years is not remote.</p> <p>The Site is in a region of generally high seismicity and has the potential to experience strong ground shaking from earthquakes on regional or local causative faults. In addition, the Site is located in an area that is subject to the hazard of liquefaction. Therefore, per ASCE 7-16 Section 20.3.1, the Site needs to be defaulted as Site Class F and seismic design parameters need to be obtained by a site response analysis performed in conformance with ASCE 7-16 Section 21.1 (American Society for Civil Engineers [ASCE] 2017). However, ACSE 7-16, Section 20.3.1 provides an exception for structures having fundamental periods of vibration equal to or less than 0.5s, where site response analysis is not required for liquefiable soils and the site class may be determined in accordance with Section 20.3, in which case this Site may be classified as a Site Class D. Although it is expected that this exception is applicable to the proposed construction, the structural engineer needs to verify that the natural period of the structures meets this condition (Tetra Tech 2022b).</p> <p>According to ASCE 7-16 Section 11.4.8, a site-specific ground motion hazard analysis shall be performed if structures on Site Class D have a 1-second period (S_1) greater than or equal to 0.2 unless the seismic coefficient C_s determined by Equation (12.8-2) is used for values of $T \leq 1.5 T_s$ and taken as equal to 1.5 times the value computed in accordance with either Equation</p>	<p>and ASCE 7-16 (ASCE 2017). A site-specific ground motion hazard analysis shall be performed if structures on Site Class D have an S_1 greater than or equal to 0.2 unless the seismic coefficient C_s determined by Equation (12.8-2) is used for values of $T \leq 1.5 T_s$ and taken as equal to 1.5 times the value computed in accordance with either Equation (12.8-3) for $T_L \geq T > 1.5 T_s$ or Equation (12.8-4) for $T > T_L$. The Site-specific ground motion hazard analysis and geotechnical building design recommendations shall be approved by the CGS and the DSA.</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>(12.8-3) for $TL \geq T > 1.5 T_s$ or Equation (12.8-4) for $T > TL$ (ASCE 2017; Tetra Tech 2022b).</p> <p>Therefore, the findings of Tetra Tech's 2022 Preliminary Geotechnical Investigation Report (Tetra Tech 2022b) show that there is the potential for adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.</p> <p>The potential risks posed by the proposed project from strong seismic ground shaking would be less than significant impacts with mitigation incorporated. Mitigation Measure GEO-1 requires that the building design for structures at the project use geotechnical building design recommendations in accordance with ASCE 7-16 (ASCE 2017) as required by the 2019 CBC (California Building Standards Commission 2019). The geotechnical building design recommendations shall be approved by the CGS and the DSA. With the implementation of Mitigation Measure GEO-1, the project would have a less than significant impact.</p>		
<p><i>Would the project result in substantial soil erosion or the loss of topsoil?</i></p>	<p>Potentially Significant Impact during Construction. Soil erosion would potentially occur during project construction activities, including Site grading, structure assembly, and utility extension. With the implementation of Mitigation Measure GEO-2, this impact would be reduced to a less than significant level with standard erosion mitigation measures, including the use of hay bales and other erosion control devices as determined by Site-specific conditions, limiting construction to the dry season, soil</p>	<p>GEO-2: An erosion plan shall be developed for proposed project construction activities that includes measures such as the use of hay bales and other erosion control devices as determined by Site-specific conditions, limiting construction to the dry season, and soil wetting, applied as required</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>wetting, and adherence to applicable regulatory guidelines and standards. These measures would also reduce potential air quality impacts and sedimentation.</p> <p>Once the proposed project is completed, no additional loss of topsoil or erosion would occur as there would be no exposed soils on the project Site and project impact would be less than significant.</p>	under applicable regulatory guidelines and standards.	
<i>Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i>	<p>Potentially Significant Impact during Construction. In Ventura County, paleontological remains, typically identified in Pleistocene-age or older deposits, include examples from throughout most of the related geological history, including the Paleozoic (600–225 million years ago), Mesozoic (225–70 million years ago) and Cenozoic (70 million years ago–present) eras. Based on the geological map of Ventura County, Oxnard quadrangle, the project Site is underlain by Holocene age (10,000 years BP to recent) alluvial fan deposits that comprise the Oxnard Aquifer that are composed of soils that are deltaic alluvium and wash fan deposits to approximately 200 feet bgs in the Site area. These are conformably underlain by upper Pleistocene alluvial sand and gravel deposits that comprise the Mugu Aquifer to approximately 400 feet bgs, and the marine–non-marine clays and gravels of the Lower Pleistocene San Pedro formation that comprise the Hueneme and Fox Canyon Aquifers to approximately 2,000 feet bgs (Gutierrez et al. 2008; Turner and Mukae 1975). Holocene age deposits are considered to have a low sensitivity for yielding paleontological resources. In 2010, a</p>	<p>GEO-3: Paleontological Resource Impact Mitigation Program. Prior to any ground-disturbing activities, a Paleontological Resource Impact Mitigation Program (PRIMP) shall be prepared by a qualified paleontologist if project construction will exceed Holocene soils (estimated depth of Holocene soils is at least to 70 feet bgs). A qualified paleontologist shall also attend the worker environmental awareness program training and provide information on paleontological resources and a brochure/handout outlining procedures in the event of a paleontological find during construction. The District Project Manager will require the construction contractor to initiate implementation of the PRIMP at the beginning of ground</p>	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>paleontological record search of the museum collection records maintained by the Natural History Museum (NHM) of Los Angeles County was conducted for the Oxnard Airport Land Easement Acquisition Project, approximately 5.3 miles southwest of the project Site (SWCA Environmental Consultants 2009). The record search included a one-mile radius around the airport and indicated that no previously identified paleontological localities occurred within the search area, nor had any resources been reported within the same Holocene age geological unit as the current project area of potential effect (APE) (SWCA Environmental Consultants 2009). Based on the estimated depth of Holocene-age deposits (to at least 200 feet bgs), surficial ground disturbance is unlikely to encounter or cause a substantial adverse change in significance to a paleontological resource (Turner and Mukae 1975). Assuming that Holocene age deposits extend to approximately 200 feet bgs at the project Site, it is highly unlikely that Pleistocene deposits will be encountered during construction. However, if project ground disturbing construction depths exceed the Holocene age deposits or encounters shallow Pleistocene deposits, paleontological resources may be exposed. Certain fossil remains are only found in isolated outcrops in Ventura County and are therefore of unique scientific interest (County of Ventura 2020a). With the implementation of Mitigation Measure GEO-3 (Paleontological Resource Impact Mitigation Program), the proposed project would have a less than significant impact.</p>	<p>disturbing activities. The PRIMP will address and define the following specific activities and responsibilities:</p> <ul style="list-style-type: none"> • Full-time monitoring by a qualified paleontologist during all grading and excavation extending more than 10 ft bgs or beyond Holocene deposits. • Spot-check monitoring by a qualified paleontologist for all grading and excavation between 5 and 10 feet bgs to determine whether older sediments with a potential to contain paleontological resources are present. • Procedures for project personnel and/or paleontological monitor to halt work and temporarily redirect construction away from an area if paleontological resources are encountered during grading or excavation in order to assess the significance of the find. • Procedures for recommendations regarding level of monitoring effort (e.g., spot check, full-time) 	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
		<p>depending upon sensitivity of soil depth, identification of finds, etc.</p> <ul style="list-style-type: none"> • Procedures for handling collected material and curation. • Procedures for reporting and documenting the results of the monitoring program. • Provide brochure of environmental awareness training. 	
<i>Cumulative Geology and Soils Impacts</i>	<p>Less than Significant Impact. The proposed project would result in a less than significant contribution to cumulative impacts on soils and geology. The proposed project and all new building projects within the surrounding study area (City of Oxnard and Ventura County) would be required to comply with the applicable State and local requirements, including, but not limited to, the CBC, and would be required to implement recommendations of a Site-specific geotechnical report. Therefore, the project specific impacts, as well as the impacts associated with other projects, would be reduced to a less than significant level. Seismic impacts are a regional issue and are also addressed through compliance with applicable codes and design standards. For these reasons, the proposed project's contribution to cumulative geotechnical and soil impacts is less than significant.</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.8 Greenhouse Gas Emissions			
<i>Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i>	Less than Significant Impact. The proposed project would generate GHGs during construction and operation activities. Detailed GHG calculation input data and results are presented in Appendix C. A summary of GHG emissions from construction and operation activities of the proposed project including, significance with respect to the SCAQMD threshold of 10,000 MT per year of CO ₂ e is presented in Table 3-16. As identified in Table 3-16, GHG emissions generated by the proposed project would not exceed the identified threshold and therefore project impacts are considered less than significant.	No mitigation is required.	Less than Significant Impact
<i>Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</i>	Less than Significant Impact. As noted above, GHG emissions generated by the proposed project would not exceed the SCAQMD threshold of 10,000 MT per year of CO ₂ e. Neither construction nor operation of the proposed project is expected to conflict with any applicable plan, policy or regulation of any agency adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, project impacts are considered less than significant.	No mitigation is required.	Less than Significant Impact
<i>Cumulative Greenhouse Gas Emissions Impacts</i>	Less than Significant Impact. The proposed project would contribute GHGs which would add to GHG emitted locally and globally. However, the GHG emissions from the proposed project would not exceed the SCAQMD interim threshold of 10,000 MT per year of CO ₂ e and therefore, cumulative project impacts are considered less than significant.	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.9 Hazards and Hazardous Materials			
<i>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?</i>	Potentially Significant Impact. Potential hazardous materials use and storage at the proposed Site in the past from agriculture practices is discussed in Section 3.9.1.1, is evaluated further below, and is mitigated with the implementation of Mitigation Measure HAZ-1. The new DTPF proposed as part of the project would include the handling of potentially hazardous materials and substances and generate hazardous waste. The handling of potentially hazardous materials and substances and generation of hazardous waste would be performed under State and local laws and regulations with regulatory oversight, including but not limited to the DTSC, the City of Oxnard, and County of Ventura. With the implementation of Mitigation Measure HAZ-1, the proposed project would have a less than significant impact.	HAZ-1: The handling of potentially hazardous materials and substances, and generation of hazardous waste at the new DTPF would be performed under federal, state, and local laws and regulations with regulatory oversight, including but not limited to the DTSC, the City of Oxnard, and County of Ventura.	Less than Significant Impact
<i>Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</i>	Potentially Significant Impact. As stated in Section 3.9.1.1, additional step out sampling should be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should also be performed at sample location SS-35. Once the extent of OCPs at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should	HAZ-2: Additional step out sampling should be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should be performed at sample location SS-35. Once the extent of OCPs	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of the RDV Expansion Project. The OCP and TPH housekeeping soil removal action will be considered complete following DTSC granting a No Further Action status to the project Site. With the implementation of Mitigation Measure HAZ-2, the proposed project would have a less than significant impact.	at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of the RDV Expansion Project. The OCP and TPH housekeeping soil removal action will be considered complete following DTSC granting a No Further Action status to the project Site.	
<i>Cumulative Hazards and Hazardous Materials Impacts</i>	Less than Significant Impact. The proposed project and all new building projects within the surrounding study area (City and the County) would be required to comply with the applicable State and local requirements, including, but not limited to, the DTSC, CDE, FAR, Caltrans, County of Ventura Department of Airports (DOA), Ventura County, and the City of Oxnard, and would be required to implement recommendations of the Site-specific PEA Equivalent Report, SSI Report, and associated DTSC approval letters. For these reasons, the proposed project's contribution to cumulative hazards and hazardous materials is less than significant.	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.10 Hydrology and Water Quality			
<i>Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?</i>	<p>Potentially Significant Impact during Construction.</p> <p>Construction Storm Water</p> <p>Construction of the proposed project would disturb approximately 11 acres (only southern campus expansion area included, as agricultural operations in the northern campus expansion area are exempt from the Construction General Permit). During construction, pollutants of concern include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Additionally, excavated soil would be exposed, so there would be an increased potential for soil erosion compared to existing conditions. Lastly, chemicals, petroleum products (such as paints, solvents, and fuels), and concrete-related waste could spill or leak and have the potential to be transported via storm runoff into downstream receiving waters (ultimately the Pacific Ocean). Since the proposed project will disturb greater than one acre of land, the proposed project must comply with the CGP. Pursuant to the CGP, a Site-specific SWPPP must be prepared that details construction BMPs for use during construction activities. Construction BMPs, as detailed in the project-specific SWPPP would include, but not be limited to, run-on and runoff controls, erosion and sediment controls designed to minimize erosion and retain sediment on-Site, and good housekeeping BMPs intended to prevent spills, leaks, and discharge of construction debris and waste into receiving</p>	<p>HYDRO-1: If perched groundwater is encountered during construction, the RSD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein.</p>	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>waters. The CGP requires weekly inspections, storm water monitoring, and reporting to ensure the BMPs are installed or implemented and effective. The proposed project includes a mix of landscaping and hardscape, which will prevent any increased risk of sediment discharge during the operation of the proposed project.</p> <p>It is not anticipated that the groundwater table would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Groundwater may contain high levels of TDS and other constituents that could be introduced to surface waters. Any groundwater dewatering performed during excavation would be completed in accordance with the Los Angeles RWQCB's Groundwater Discharge Permit. This permit requires testing and treatment (as necessary) of groundwater prior to its discharge off-Site. If perched groundwater is encountered during construction, then under Mitigation Measure HYDRO-1, the RSD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein to ensure that the proposed project would not violate any water quality standards or waste discharge requirements.</p> <p><i>Post-Construction Storm Water</i></p> <p>In order to terminate CGP coverage by filing a NOT with the State Water Board, the proposed project must demonstrate that final stabilization has been reached (i.e., area disturbed by</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>construction activities must be re-established to a uniform vegetative [or alternative permanent] cover equivalent to 70% coverage of the preconstruction vegetative conditions); all elements of the SWPPP must be complete; no greater potential for construction related pollutants to be discharged into the Site runoff than pre-construction; all construction materials, equipment, wastes, and temporary and plastic-containing BMPs must be removed from the Site; compliance with the MS4 Permit's post-construction standards (pursuant to the TGM, County of Ventura 2015) must be demonstrated; and a post-construction control measure long-term maintenance plan must be established.</p> <p>At the time of developing this EIR, Jensen's <i>Rio de Valle Middle School Expansion Preliminary Drainage/Hydrology Report</i> (Jensen 2022a) proposes the southern campus expansion area's post-construction control measures consist of capturing runoff from the project Site, other than that from the 98% pervious sport fields at the southeast corner of the project Site, in storm drains that will route runoff to a hydrodynamic separator for pretreatment, then into an infiltration/detention basin during low- and high-level rain events. Mid-level rain events will bypass the system with a diversion structure. Discharges from the basin will flow south to Collins Street, which borders the project Site to the south, and flow east to the existing City stormwater conveyance system on Auto Center Drive. The report states that the modeled infiltration volume and basin freeboard storage exceeds the 2021</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Ventura County MS4 Permit (Order R4-2021-0105) and <i>Ventura County Technical Guidance Manual</i> (County of Ventura 2011, updated 2015 and 2018) requirements.</p> <p>A PCSMP, Design Criteria Checklist from Appendix G of the TGM, and Covenant for Maintenance of PCSMP that describes the post-construction features and calculations must be submitted to the City of Oxnard for review for all applicable new development projects. Additionally, the RWQCB will require verification of installation of the City-approved post-construction control measures and development of the long-term maintenance agreement as part of the NOT approval process. The post-construction features constructed and maintained in accordance with the TGM would comply with water quality standards and mitigate hydrologic impacts incurred by the new impervious surfaces.</p> <p>Wastewater</p> <p>The City of Oxnard provides existing wastewater service to RDV through an extension of the sewer main in Rose Avenue to the existing project Site. The 11.1-acre southern campus expansion area is currently served by a residential septic system and does not contribute to the wastewater system. Sewer service is proposed to be provided to the southern campus expansion area via a new connection to the City of Oxnard sewer main, separate from the existing main campus sewer. The nearest City line is an 8-inch line in Collins Street, adjacent to the southerly boundary of the site. The line runs east in Collins Street and south</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>in Via Estrada before discharging to a 15-inch trunk line in Auto Center Drive at a manhole in the intersection (Jensen 2022c).</p> <p>Sewer service for new improvements on the existing main campus will be via connecting to the existing RDV sewer Point of Connection (assuming adequate capacity). Jensen analyzed the proposed increase in sewer flow due to the proposed campus expansion to show its impact on existing infrastructure. It was determined that the existing 8-inch sewer line that the project Site will connect to and the downstream 15-inch trunk line will meet the City of Oxnard's standards and capacity criteria and are sufficiently sized to accommodate the needs of the proposed project (Jensen 2022c).</p> <p>With compliance with existing regulations including implementation of stormwater BMPs that target pollutants of concern in runoff from the project Site, implementation of Mitigation Measure HYDRO-1 and connection to the Oxnard Wastewater Treatment Plant (OWTP), the potential for violation of water quality standards or waste discharge requirements and degradation of water quality would be less than significant.</p>		
<p><i>Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</i></p>	<p>Potentially Significant Impact. During construction, it is not anticipated that the groundwater table would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Any groundwater dewatering performed during excavation would be temporary, not result in a</p>	<p>HYDRO-2: The project shall meet its City of Oxnard Water Neutrality Policy requirements by completing at least one of the following:</p> <ul style="list-style-type: none"> Transfer of existing Fox Canyon Groundwater Management Agency 	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>substantial volume removed, and completed in accordance with the Los Angeles RWQCB's Groundwater Discharge Permit. Grading and construction activities would compact soil, and construction of structures would increase impervious area, which can decrease infiltration during construction. However, construction activities would be temporary, and the reduction in infiltration would not be substantial relative to the Oxnard Forebay Groundwater Basin. Conversely, the proposed post-construction infiltration/detention basin may contribute to groundwater recharge in the Oxnard Forebay, which is highly desirable. Therefore, construction of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Construction impacts related to groundwater supplies would be less than significant and no mitigation is required.</p> <p>Potable Water Sources</p> <p>The proposed project will increase the school's water demands. The new 10-acre northern campus expansion area will require irrigation water for crops. Using the FCGMA Crop Year Irrigation Allowance Table, and assuming the crops are avocados with 20-70% ground shading, typical precipitation, the farm will require 2.0 acre-feet/acre. Given the farm is 10 acres, this results in 20 acre-feet per year (AFY) demand for the northern campus expansion area. The southern campus expansion area will increase the number of classrooms and add a bus wash. Additionally,</p>	<p>(FCGMA) groundwater allocations to the City;</p> <ul style="list-style-type: none"> • Contributing to increased efficiency by funding City water conservation programs; • Funding recycled water retrofit projects; or • Providing additional water supplies. 	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>the proposed project plans to replace all existing and new sports fields with “xeriscape” (i.e., landscape requiring very little to no irrigation), resulting in a net decrease in landscaping water demand. Jensen calculated the ratio between the existing and proposed areas to determine the projected water demand. They found RSD will have a net surplus of 17.701 AFY of water allocations with the proposed project (Jensen 2022b). Additionally, the City requires selected new development projects to design and construct dual piping systems within their project areas to facilitate the delivery of recycled water for non-potable uses, such as irrigation of landscaping and athletic fields. Infiltration of water used for irrigation or other outdoor uses and stored in the infiltration basin would contribute to recharge of the underlying basin. A portion of the proposed project’s wastewater will be treated at the publicly owned treatment works (POTW), treated at the Advanced Water Purification Facility (AWPF), and injected into the groundwater basin. Therefore, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operational impacts related to groundwater supplies would be less than significant and no mitigation is required.</p> <p>Neutrality</p> <p>The City developed a credit bank for use during extended drought or water supply restricted conditions and will gradually restore its groundwater credit bank as a buffer against future</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>supply constraints with the GREAT Program (City of Oxnard 2012). It is anticipated that reasonably-projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection are sufficient to meet the water demand associated with the proposed project, in addition to the City's existing and planned future uses (City of Oxnard 2012). Furthermore, the City imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The requirements of the City Water Neutrality Policy are included in the proposed project's water allocation analysis (Jensen 2022b). The City is requiring the proposed project to present a plan for water neutrality. Therefore, with the implementation of Mitigation Measure HYDRO-2, the proposed project's impacts on groundwater supply would be less than significant.</p>		
<p><i>Would the project substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:</i></p>	<p>Less than Significant Impact. During construction activities, the project Site would be graded and excavated, exposing soil and increasing the potential for soil erosion compared to existing conditions. During a storm event, soil erosion and sedimentation could occur at an accelerated rate. For example, excavation activities result in soil stockpiles, which has the</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>i.) Result in substantial erosion or siltation on- or off-Site;</i>	potential to be washed into storm drains, blown off-Site by wind, or tracked off-Site by heavy equipment. In addition, construction activities would compact soil, and construction of structures would increase the impervious area, which can increase runoff during construction. Since the proposed project will disturb greater than one acre of land, the proposed project must comply with the CGP. Pursuant to the CGP, a Site-specific SWPPP must be prepared that details construction BMPs for use during construction activities. Construction BMPs would include, but would not be limited to, erosion and sediment controls designed to minimize substantial erosion or siltation. Prior to terminating coverage under the CGP, the project Site must be stabilized and not pose any additional sediment discharge risk than it did prior to the commencement of construction activity. The proposed project includes a mix of landscaping and hardscape that will minimize erosion. Implementation of the Site-specific SWPPP during construction activities would reduce the potential for altering drainage patterns or causing flooding to less than significant levels during construction. Additionally, much of the runoff from the Site will be retained and/or treated within post-construction control measures. Therefore, the proposed project will not result in substantial erosion or siltation on- or off-Site.		
<i>ii.) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</i>	Less than Significant Impact. There are no on-Site streams or rivers; therefore, the proposed project would not alter the course of a stream or river. Although the existing drainage pattern of the	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	project Site would be substantially altered, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion, sedimentation, or flooding on- or off-Site with compliance with existing regulations and the MS4 Permit's post-construction standards. Operational impacts related to on- or off-Site erosion, siltation, and flooding would be less than significant, and no mitigation is required.		
iii.) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<p>Less than Significant Impact. Currently, storm water discharges from the existing middle school and project Site discharge via sheet flow southeast to storm drains on Auto Center Drive, approximately 0.25 mile from the project Site. The proposed project will route storm water from pervious and impervious surfaces via storm drain inlets, curbing, and piping and will continue to discharge to Auto Center Drive after construction of the southern campus expansion area is complete. The City requires that new development not exceed 1 cubic foot per second per acre (cfs/ac) runoff discharge rate and Jensen has designed the proposed infiltration/detention basin with this standard incorporated. The 1 cfs/ac flow rate was deemed an acceptable flow rate to prevent downstream flooding of the receiving waters and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems.</p> <p>The proposed project would change on-Site drainage patterns by adding impervious surface areas, including buildings and parking lots, and</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	constructing drainage structures. An increase in impervious area would increase the volume of runoff during a storm, which would more effectively transport pollutants to receiving waters. As stated above, the proposed features include pre-treatment of runoff from the southern campus expansion area with hydrodynamic separators (Downstream Defender or similar) (Jensen 2022a). The treated water would then flow into the infiltration/detention basin, except mid-level flows that will bypass the system. Through these stormwater control measures, both on-Site and off-Site flooding will be controlled. Operational impacts related to capacity of stormwater drainage systems would be less than significant and no mitigation is required.		
<i>iv.) Impede or redirect flood flows?</i>	<p>Less than Significant Impact. Although the project's new impervious surfaces would change the hydrology on Site, the proposed post-construction features (pre-treatment system and infiltration/detention basin) are specifically designed to prevent alteration of downstream watercourses and restrict flood potential. Additionally, the Site's stormwater conveyance features will be sized to the City's allowable flow rate (i.e., less than 1 cfs/ac), which is designed to prevent downstream flooding. Therefore, both on-Site and off-Site flooding will be controlled.</p> <p>Because the project Site is outside the 100-year flood zone, it is not within a flood hazard area. Additionally, the proposed project would not involve placing structures that would impede or redirect flood flows within a 100-year flood hazard area. Therefore, the proposed project would not</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	place within a 100-year flood hazard area structures that would impede or redirect flow and project impact would be less than significant.		
<i>In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?</i>	<p>Potentially Significant Impact.</p> <p>Flood Hazard</p> <p>As shown in the FEMA FIRM for Ventura County Incorporated Areas, the project Site is not within a flood hazard zone (FEMA 2020). According to the City Integrated Master Plan (Carollo 2017) the project Site is located in an “Area of Minimal Flooding”.</p> <p>The proposed project is located in the Santa Clara River Levee (SCR-1) (FEMA ID No. 18) Improvements Upstream of Highway 101 Project area, which consists of structural improvements intended to provide flood protection for residential, public, commercial, industrial, and agricultural areas along the river within the floodplain of the Santa Clara River, risk of levee failure would be mitigated. Additionally, compliance with Mitigation Measure HYDRO-3, which requires RSD to develop and implement a Site-specific flooding evacuation plan to be implemented in conjunction with the OES <i>Dam Failure Response Plan</i>, project impacts would be less than significant.</p> <p>Tsunami and Seiche Hazard</p> <p>According to the Tsunami Inundation Map for Emergency Planning Oxnard Quadrangle prepared by the California Emergency Management Agency, CGS, and the University of Southern California (2009), the project Site is well outside of any tsunami inundation areas. No</p>	<p>HYDRO-3: The RSD shall develop and implement a Site evacuation plan to be implemented in conjunction with the County of Ventura OES Dam Failure Response Plan.</p>	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	lakes, rivers, or other inland waters that could cause a seiche are located near the project Site. The County of Ventura has not identified “seiche zones” and the Ventura County General Plan, Hazards Appendix states that there is no historic record of a seiche occurring in Ventura County, although County residents experienced small seiches caused by swimming pools during the 1994 Northridge earthquake (County of Ventura 2013). Therefore, tsunamis and seiches are not considered to be potential hazards to the project Site and there is no impact.		
<i>Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</i>	Less than Significant Impact. The Oxnard Plain Basin is the primary source of groundwater supplying Oxnard’s service area. The FCGMA allocates and limits groundwater extraction volumes to address overdraft and to bring the basins to “safe yield” (when groundwater extraction from a basin are approximately equal to annual replenishments of water into the groundwater basin; the safe yield estimate for the FCGMA area is approximately 120,000 AFY), mostly to halt groundwater intrusion (WSC 2021). The FCGMA SGMP addresses the long-term sustainability of the basin for municipal and agricultural pumpers. The SGMP contains historical data, groundwater levels, groundwater quality, subsidence, groundwater-surface water interaction, historical and projected demands and supplies, recharge areas, measurable objectives, interim five-year milestones, a sustainability goal, and a plan to achieve the goal in 20 years, with a 50-year planning and implementation horizon. Although the proposed project will increase water	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	demand, the FCGMA water allocations are sufficient to provide this supply and will have a net surplus of 17.701 AFY (Jensen 2022b). Therefore, the proposed project is not expected to conflict with the SGMP and project impacts to the SGMP will be less than significant.		
<i>Cumulative Hydrology and Water Quality Impacts</i>	<p>Less than Significant Impact. The proposed project's contribution to cumulative impacts to hydrology and surface water quality would be less than significant. The cumulative impacts of the proposed project on hydrology and water quality are:</p> <p>Surface Water. The proposed project would not alter the City's storm water drainage features associated with the project Site. The increase in runoff volume and rate caused by the proposed project's new impervious surfaces would be mitigated by the project's proposed post-construction features, which are required by the Construction General Permit and the City's MS4 Permit, will follow the TGM (County of Ventura 2011, updated 2015 and 2018), will be defined in the PCSMP, and vetted by the City. The design to the storm water drainage features will be required to comply with the City's 1 cfs/ac flow rate to prevent downstream flooding of the receiving waters and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems. Therefore, the proposed project's contribution to cumulative storm water drainage impacts would be less than significant.</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Groundwater. The proposed project is not anticipated to impact groundwater quality. The underlying Oxnard Forebay may receive some recharge from runoff infiltration in the proposed retention basin and irrigation infiltration from the educational agricultural fields, landscaping, and sports fields, which would be beneficial to the groundwater basin. Although irrigation and agricultural runoff can contain nitrogen-based products and cause leaching of nitrate into the basin and the Oxnard Forebay has been prone to nitrate MCL exceedances, the net contribution would be lower post-construction due to the transition of the southern campus expansion area from agriculture to educational land use. Therefore, the proposed project's contribution to groundwater impacts would be less than significant.</p> <p>Flooding. The project Site is located outside of the 100-year and 500-year floodplain, is not within a levee or flood risk area, and it not in a seiche, tsunami, or mudflow risk area. The proposed project will discharge no more than the City-required 1 cfs/ac off-Site (Jensen 2022a) to avoid flooding impacts downstream. Given the installation of post-construction features described above, the proposed project would not impact increase overall flood potential in the City. Therefore, the proposed project's contribution to cumulative flooding impacts would be less than significant.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.11 Land Use and Planning			
<p><i>Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</i></p>	<p>Less than Significant Impact.</p> <p>LAFCo Actions</p> <p>The proposed project would require annexation into the City of Oxnard, with associated SOI and CURB growth boundary amendments, all of which would require LAFCo approval. The proposed changes of organization are collectively called “reorganization.” The following LAFCo actions would be necessary components of the reorganization.</p> <ul style="list-style-type: none"> • Annexation of all three proposed project parcels to the City of Oxnard. • Annexation of all three proposed project parcels to CMWD. • Amendment of the City of Oxnard’s SOI to include the northern and southern campus expansion areas. • Amendment of the City of Oxnard CURB to include the northern and southern campus expansion areas. <p>The District will process a GPA, RZ, and a Reorganization and SOI amendments through the City of Oxnard. The proposed project will be required to be reviewed and recommended for approval to the City Council by the Planning Commission at a noticed public hearing prior to the City Council’s public hearing process and final action. If the project is approved by the City Council, the City will file a Resolution of Annexation with LAFCo. Upon approval of the</p>	<p>No mitigation is required.</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>reorganization and SOI amendments by LAFCo, and a 30-day reconsideration period, the reorganization will be recorded, and the project Site will be annexed into the City of Oxnard and the CMWD and eligible for all public services. Discussion of project consistency with relevant LAFCo Policies is provided in Tables 3-18 through 3-20.</p> <p>As identified in Tables 3-18, 3-19, and 3-20, the proposed project is generally consistent with LAFCo policies and project land use impact would be considered less than significant.</p> <p>Discussion of project consistency with relevant City of Oxnard 2030 General Plan and El Rio/Del Norte Area Plan policies is provided in Table 3-21. Consistent with Ventura LAFCo Commissioner's Handbook Section 3.2.4.1 (as provided in Table 3-18), this discussion is limited to the northern and southern campus expansion areas and does not include the existing main campus.</p> <p>The existing main campus of the project Site has been developed with a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety.</p> <p>One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost-effective option.</p> <p>As discussed in Section 3.2 of this EIR, implementation of the proposed project would result in the conversion of agricultural land into educational uses, resulting in a significant, unavoidable, and permanent loss of 8.2 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. No feasible mitigation measures were available to reduce the impact to a less than significant level. However, Mitigation Measure AG-1 is proposed to reduce the potential impact, and the proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east. Through Policy AG-1.3, the County expresses its commitment to restrict development to uses consistent with existing agricultural or open space zoning (County of Ventura 2020a). As discussed in Section 3.2 of this EIR, the project will not have a significant adverse effect on the physical and economic integrity of other prime agricultural or existing open space lands outside of the project area. The northern and southern campus expansion areas are located within the greenbelt established by the 1984 "Joint Resolution of the City Councils of the City of Camarillo and the City of Oxnard and the County of Ventura Establishing a Greenbelt Between North and South of the Two Cities." As part of the proposed project, the RSD is requesting that this agreement be amended. Specifically, the map is to be amended to exclude the proposed northern and southern campus expansion areas. If the requested amendment is approved by all parties (City of Camarillo, City of Oxnard, County of Ventura), then the proposed project would be consistent with this policy. As shown in Table 3-16, the County's approval of the proposed project is limited to amending the existing Camarillo-Oxnard Greenbelt Agreement. Any conditions imposed on the proposed project will be from other agencies with discretionary approval (e.g., City of Oxnard).</p> <p>Additionally, Table ED-3 of the El Rio/Del Norte Plan limits the maximum building lot coverage to 60% of total lot area within the Institutional zone</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>(which the northern and southern campus expansion areas will effectively become, if the proposed project is approved); the proposed building coverage on the northern campus expansion area and southern campus expansion area would be approximately 0% and 25%, respectively. Although a copy of the NOP was not provided directly to the El Rio/Del Norte Municipal Advisory Council, they will be included in the distribution list for this EIR. As described in more detail in Section 3.18, <i>Utilities and Service Systems</i>, the RSD in general, and the RDV school in particular, are currently in compliance with all federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed project expansion would require continued conformance with these statutes and regulations, including continued participation of the RDV school in existing City recycling programs. Modification of the existing Waste Management Plan will also be required to include the proposed facilities. All new construction will also be required to achieve the 65% diversion requirement per CALGreen standards. The revised plan must be prepared and submitted to the City of Oxnard Environmental Resources Division prior to the issuance of a building permit. Additionally, AB 939 mandates a minimum 67% diversion rate during operations. As such, the proposed project will employ measures to reduce solid wastes generated and will have a recycling program. The proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours and will likely lessen the physical impacts/demand on nearby park and recreational facilities. The increase in runoff volume and rate caused by the proposed project's new impervious surfaces would be mitigated by the project's proposed post-construction features, which are required by the Construction General Permit and the City's MS4 Permit, will follow the TGM (County of Ventura 2011, updated 2015 and 2018), will be defined in the PCSMP, and vetted by the City of Oxnard. The design to the storm water drainage features will be required to comply with the City's 1 cfs/ac flow rate to prevent downstream flooding of the receiving waters and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems. Therefore, the project's storm water drainage impacts would be less than significant. As discussed in Section 3.10.2, Hydrology and Water Quality Impact Analysis, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operation impacts related to groundwater supplies would be less than significant, and no mitigation is required. The proposed project is generally consistent with relevant Ventura County General Plan polices and</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>project land use impact would be considered less than significant.</p> <p>City of Oxnard 2030 General Plan and Zoning</p> <p>The project Site is currently located within unincorporated Ventura County and the zoning designation is RE-20,000 S.F. (Existing Campus) and AE-40 ac/MRP (Northern and Southern Campus Expansion Areas). Schools are prohibited within the County's AE-40 zone. However, the proposed project includes annexation into the City of Oxnard thereby the County's land use designations would no longer be applicable to the project Site.</p> <p>The RSD would process a GPA, RZ, and a Reorganization and SOI amendments through the City of Oxnard. The proposed General Plan land use designation is School, and the proposed zoning designation is Community Reserve (C-R). Schools are an allowed use within the C-R zone with approval of the special use permit (Oxnard Municipal Code Section 16-257). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with the General Plan and zoning land use designations.</p> <p>The existing main campus is located within an area that is planned for continued use as a middle school, and the northern and southern campus expansion areas are within the Oxnard-Camarillo Greenbelt.</p> <p>Notwithstanding a General Plan or Zoning Amendment, School Districts are not required to comply with the local building ordinances, except</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>for city and or county ordinances for (1) regulating drainage improvements and conditions; (2) regulating road improvements and conditions; and (3) requiring the review and approval of grading plans, to the extent such ordinance provisions relate to the design and construction of on-Site improvements that affect drainage, road conditions and traffic flow.</p> <p>A General Plan Consistency analysis for relevant key land use policies is provided in Table 3-21.</p> <p>As identified in Table 3-21, the proposed project would be generally consistent with the General Plan policies and the project's land use impact is considered less than significant.</p> <p>Oxnard-Camarillo Greenbelt Agreement Map Amendment</p> <p>Annexation of the northern or southern campus expansion areas to the City of Oxnard would trigger an amendment to the Oxnard-Camarillo Greenbelt Agreement, as approved by City of Oxnard Resolution No. 8616, Board of Supervisors Resolution No. 222, and City of Camarillo Resolution No. 84-9 in February 1984. Specifically, the resolution reads as follows:</p> <p>“Now, Therefore, Be It Resolved, that the Camarillo City Council, the Oxnard City Council, and the Ventura County Board of Supervisors hereby establish this greenbelt for and agree to a policy of non-annexation, non-development, and retention of open space uses...”</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>As such, the proposed project includes a request to the City of Oxnard, City of Camarillo, and County of Ventura to amend Exhibit 2 of the agreement (i.e., the map) to remove the southern campus expansion area (as a non-agricultural campus expansion) and the northern campus expansion area (for consistency) from the Greenbelt. Approval of this request would not otherwise require a material change to the text within the agreement, and the agreement would remain in place. Therefore, if the request is approved by all parties, there would be no significant impact to the Oxnard-Camarillo Greenbelt Agreement.</p> <p>County of Ventura and City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinances</p> <p>Currently, the northern and southern campus expansion areas are located within the County of Ventura's SOAR Ordinance. Generally, removing parcels from the County's SOAR ordinance requires a vote of the people. In this case, however, if the requested annexations are approved, these two parcels would fall under the City of Oxnard's SOAR ordinance which exempts school facilities from a vote of the people. Specifically, Section 3, Subsection 6 (Exemptions) states:</p> <p>“The provisions of this ordinance otherwise requiring a vote of the people do not apply to nor affect the authority and discretion of the City Council with respect to any roadways designated in Chapter 4,</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Infrastructure and Services of the 2030 Oxnard General Plan as of adoption and subsequent amendments, construction of public potable water facilities, public schools, public parks or other government facilities, or any development project that has obtained as of the effective date of this initiative a vested right pursuant to state or local law."</p> <p>Therefore, if the proposed annexations are approved, the proposed project would be consistent with the City of Oxnard's SOAR ordinance.</p>		
<i>Cumulative Land Use and Planning Impacts</i>	<p>Less than Significant Impact. As described in Sections 2.2 and 2.6, as of January 2022, over 290 planned and pending projects are located within the City of Oxnard. Projects in the Site vicinity include Rio Urbana, the Maulhardt/Stiles Northeast Community Specific Plan (NECSP) Sub-Neighborhood Plan, various projects falling under the greater Riverpark development, and multiple commercial and industrial projects. The Riverpark development, Rio Urbana, and the Maulhardt/Stiles NECSP Sub-Neighborhood Plan are the three pending projects that could directly affect the proposed project herein, and have the potential to bring in additional student population to the City through new residential units. While the commercial and industrial projects in the Site vicinity may add available jobs and consumer appeal to the area, these projects will not directly add permanent population and housing that would affect RSD and its student body (City of Oxnard 2022a; RSD 2021). District-wide individual school</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>boundary adjustments will be made as needed in the future, and the proposed project will improve the RSD's ability to accommodate an increased student body.</p> <p>The proposed project includes the expansion of the RDV campus and related programs and would be required to comply with applicable land use regulations in order to be granted the discretionary land use approvals needed for expansion. As shown in Table 3-16, and as discussed above, the various discretionary approvals that are required include annexation into the City of Oxnard, annexation into the CMWD, General Plan and Zoning (map) Amendments, amending the Oxnard-Camarillo Greenbelt Agreement, and Amending the City of Oxnard's SOI and CURB. If these requests are granted, the proposed project would comply with all applicable policies and ordinances. Aside from the impacts associated with agricultural conversion addressed in Section 3.2 of this EIR, project contribution to a cumulative land use impact would thereby be considered less than significant.</p>		

3.12 Mineral Resources

<i>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?</i>	<p>Less than Significant Impact. The project Site is located in in an area of Ventura County where the SMGB has designated MRZ-2 based on the <i>Mineral Land Classification of Ventura County, Special Report 145 Parts I, II, and III</i>. (CDMG 1981). While the areas designated MRZ-2 represent the State's best guess as to where aggregate resources are located, these conclusions were based upon proprietary industry</p>	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>data, historic well logs and borings, and general knowledge about aggregate bearing formations. No original field research was conducted to specifically assess the quantity or quality of the resource. (Ventura County 2019). Therefore, the project Site is in an area or where the presence of aggregate mineral resources is inferred, or MRZ-2b. There is an absence of historical surface mining in the immediate area. In addition, surface mining at the Site would have to be consistent with the area land use designations and found to be consistent with the neighboring land uses. It is unlikely that mining activities would be found compatible with the adjacent land uses including the residential areas immediately across North Rose Avenue from the Site, the adjacent RDV Middle School, or Oxnard Auto Park across Collins Street to the south of the Site. Also, the two separate areas of the Site that could be available for mineral resource extraction, 10.0 acres (northern campus expansion area) and 11.1 acres (southern campus expansion area) are too small to support mineral extraction surface mining operations. Based on the above factors, the potential for surface mining at the project Site is considered extremely low. While proposed project improvements will require the use of sand, gravel, and aggregate during construction, due to the limited size of the proposed campus in comparison to the level of development being experienced in the City of Oxnard and the region, the proposed project would not require such a substantial portion of the existing mineral resources in the area to create a shortage of supplies for other projects and consumers.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	Therefore, there would be no project impact. Therefore, the proposed project would not be expected to 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 and the potential impact to future mineral resources is less than significant.		
<i>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?</i>	Less than Significant Impact. As stated in the previous section, the project Site is in an area or where the presence of aggregate mineral resources is inferred, or MRZ-2b. There is an absence of historical surface mining in the immediate area. In addition, surface mining at the Site would have to be consistent with the area land use designations and found to be consistent with the neighboring land uses. It is unlikely that mining activities would be found compatible with the adjacent land uses including the residential areas the immediately across North Rose Avenue from the Site, the adjacent RDV Middle School, or Oxnard Auto Park across Collins Street to the south of the Site. Also, the two separate areas of the project Site that could be available for mineral resource extraction, 10.0 acres (northern campus expansion area) and 11.1 acres (southern campus expansion area) are too small to support mineral extraction surface mining operations. Based on the above factors, the potential for surface mining at the project Site is considered extremely low. Therefore, the proposed project would not be expected to 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 and the	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	potential impact to future mineral resources is less than significant.		
<i>Cumulative Mineral Resources Impacts</i>	Less than Significant Impact. As noted above, the proposed project would not be expected to 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 and the potential impact to future mineral resources is less than significant. The proposed project would not be expected to 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 and the potential impact to future mineral resources is less than significant. Therefore, cumulative project impacts are considered less than significant.	No mitigation is required.	Less than Significant Impact

3.13 Noise

<i>Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies?</i>	Potentially Significant Impact during Construction. The City of Oxnard General Plan Noise Element identifies land use compatibility standard for noise-sensitive land uses as a CNEL of 55 dBA to 70 dBA as conditionally acceptable. The dominant noise source in the vicinity of the proposed project Site is traffic noise associated with Rose Avenue and Collins Street. Based on existing traffic volumes, noise impacts to adjacent residences along Rose Avenue range from 68 to 70 dBA CNEL. The proposed project would result in an increase in traffic along Rose Avenue and Collins Street during the arrival and departure of students. The proposed project traffic analysis identifies an increase of 792 Average Daily Trips (ADT) to Rose Avenue and Collins Street. This	N-1: Construction noise levels fluctuate depending on the construction phase, equipment types and duration of use; distance between noise source and sensitive receptor; and the presence or absence of barriers between noise source and receptors. Therefore, the project proponent should require construction contractors to limit standard construction activities as follows: <ul style="list-style-type: none"> Equipment and trucks used for project construction shall utilize the best available 	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>increase in ADT represents an increase of less than 1 dBA at the residences adjacent to the proposed project. According to the CEQA guidelines, an increase in the overall ambient community noise level of less than 1 dBA is considered to be a less than significant impact. The construction of the proposed Site would have only a minimal impact on daily traffic volumes in the proposed project vicinity, and thus would have minimal impact on traffic noise conditions.</p> <p>Construction of the proposed project is planned to start in the first quarter 2023. All project construction activities are anticipated to be completed within 18 months. The project construction activities are anticipated to occur in phases and include site preparation, grading, building construction, paving, and architectural coating. These construction activities would require a variety of equipment. Typical construction equipment would not be expected to generate noise levels above 90 dBA at 50 feet, and most equipment types would typically generate noise levels of less than 85 dBA at 50 feet.</p> <p>The highest noise levels during construction are normally generated during Site grading and paving work. Grading equipment would be the loudest equipment used at the project Site. This equipment is expected to generate a L_{max} of up to 71–80 dBA at the homes located at a distance of 100 feet to the west of the proposed project. This would be loud enough to temporarily interfere with</p>	<p>noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible. In addition, the time allowed for equipment and trucks to idle will be limited to the extent practicable.</p> <ul style="list-style-type: none"> • Stationary noise sources shall be located as far from adjacent receptors as possible and shall be muffled and enclosed within temporary sheds, incorporate insulation barriers or other measures to the extent feasible. • Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatically powered tools is unavoidable, an 	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>speech communication outdoors and indoors with the windows open.</p> <p>Worst-case construction levels would generate an L_{max} of 90 dBA at the RDV Middle School. This is loud enough to interfere with speech communication outdoors or indoors. Project construction would occur between the hours of 7:00 a.m. and 5:00 p.m., Monday through Friday. Project construction will also implement standard noise reduction measures. Due to the infrequent nature of loud construction activities at the project Site, the limited hours of construction, and the implementation mitigation measure N-1, the temporary increase in noise due to construction is considered to be a less than significant impact with mitigation.</p> <p>The project Site is located within the Oxnard Airport SOI. The airport runway midfield point is located approximately 4 miles southwest of the project Site. Oxnard Airport is an active general aviation/small scheduled service airport with approximately 169 based aircraft and approximately 74,157 operations for calendar year 2016 (VCTC 2017). The Oxnard Airport Noise Contour map within the City of Oxnard Noise Element to the General Plan shows that the project Site is located outside of the 60 dBA CNEL contour. Therefore, the noise impact levels from the Oxnard Airport to the project Site will be below 60 dBA CNEL and with typical educational facility construction with windows closed, interior noise levels from aircraft operations are expected to achieve 45 dBA CNEL or less, which achieves both the State and City interior noise</p>	<p>exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible. This could achieve a reduction of 5 dBA. Quieter procedures shall be used such as drilling rather than impact equipment whenever feasible.</p> <ul style="list-style-type: none"> Heavy construction equipment operations should be limited during the school period when classrooms are being utilized in the adjacent building. When heavy construction activities are located within 75 feet of a residential structure deploy a temporary portable sound barrier between the construction activities and nearest sensitive receptor. 	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>requirements. Therefore, noise impacts from the Oxnard Airport are considered to be less than significant.</p> <p>The City of Oxnard's Code of Ordinances Chapter 7 Section 7-185 limits noise propagation to residential land uses from stationary equipment during the daytime period (7:00 a.m. to 10:00 p.m.) to 55 dBA L_{eq} and during the nighttime period (10:00 p.m. to 7:00 a.m.) to 50 dBA L_{eq}. The proposed project consists of the construction and operation of an expansion to the RDV Middle School comprising approximately of an additional 11.1 acres (southern campus expansion area) incorporating new parking lots and six new buildings. These six new buildings were assumed to include an approximate total of 25 rooftop HVAC units and 25 rooftop exhaust fans. The classrooms would be designed and constructed to have a Community Noise Equivalent Level of 45 dB or less.</p> <p>This proposed project will include six new buildings, which include an approximate total of 25 rooftop HVAC units and 25 rooftop exhaust fans. Given the elevated rooftop height for the mechanical equipment and assuming the rooftop mechanical equipment operates simultaneously, the noise levels from the operation of all the rooftop mechanical equipment would range from 21 dBA L_{eq} at the residential homes located directly northwest of the project to 29 dBA L_{eq} at the residential homes located directly west of the proposed project. The noise impacts from the rooftop mechanical equipment will result in a less than 1 dBA increase to the existing ambient noise</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	levels. The noise levels generated by the proposed project will comply with the City of Oxnard's General Plan and Code of Ordinances. Therefore, impact due to ambient noise levels in the vicinity of the proposed project is less than significant.		
<i>Would the project result in generation of excessive groundborne vibration or groundborne noise levels?</i>	<p>Less than Significant Impact. Operation of the middle school would not generate vibration; however, construction of the classroom buildings and Site grading as well as infrastructure improvements and utility connections would require the use of equipment that could generate vibration. Possible sources of vibration may include bulldozers, dump trucks, backhoes, rollers, and other construction equipment that produces vibration. No blasting will be required at the project Site.</p> <p>Project construction activities would occur within approximately 100 feet from the nearest single-family residence. According to FTA guidelines, a vibration level of 78 VdB is the threshold of perceptibility for humans. For a significant impact to occur, vibration levels must exceed 80 VdB during infrequent events (Federal Transit Administration 2006). Based on the levels published by the FTA (Federal Transit Administration 2006) and the type of equipment proposed for use at the proposed project, coupled with the distance to the existing identified noise sensitive receptors, analysis shows that the vibration levels maybe perceptible at the nearest sensitive receptors, but will be below the maximum vibration level of 80 VdB. This vibration</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>level is considered acceptable for impacts to sensitive receptors.</p> <p>Project construction will also occur directly adjacent to the middle school buildings and will result in vibration levels up to 94 VdB, which will exceed the 80 VdB level at the middle school. This would be a significant impact to students and personnel on the existing RDV campus based on their proximity to the construction activities. However, with the implementation of mitigation measure N-1, the temporary increase in noise due to construction is considered to be a less than significant impact with mitigation.</p>		
<i>Cumulative Noise Impacts</i>	<p>Less than Significant Impact. Cumulative projects include the effects of existing, current and reasonability foreseeable future projects. As noted above, the proposed project is shown to not significantly increase the overall ambient community noise level and would not expose persons to or generate excessive groundborne vibration or groundborne noise. Therefore, project cumulative impact would be less than significant.</p>	No mitigation is required.	Less than Significant Impact

3.14 Population and Housing

<p><i>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)?</i></p>	<p>Less than Significant Impact. Existing student capacity at RDV is approximately 1,116 students. With construction of the proposed 10 classrooms, student capacity would increase by 250, to approximately 1,366 students. This increase in capacity is needed to accommodate existing and anticipated future enrollment in RSD. Construction workers for the proposed project are expected to be drawn from the local labor pool.</p>	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>During operation, the proposed project would have approximately 95 employees.</p> <p>The proposed project would not directly induce growth as it does not involve residential development. The proposed project will involve utility undergrounding along public rights-of-way (ROWs) that will tie into existing City of Oxnard utilities along Collins Street, and will include a 25-foot wide access road running from south to north from Collins Street into the RDV campus. The construction of the proposed infrastructure will not extend into undeveloped areas and as such is not considered to be directly growth-inducing. Therefore, impacts are less than significant.</p> <p>In general, educational facilities are growth accommodating, not growth inducing. Increased demand for school services is generally linked to changes in local land use patterns such as the construction of new dwelling units and the generation of new jobs that encourages new people to move into the area. No housing is proposed as a part of the proposed project.</p> <p>The City of Oxnard's cumulative project list contains three new commercial/retail facilities, and projects for "Assembly Use, Oil and Gas Production, and Greenhouse Structures," as listed in Table 2-6, Cumulative Project List. None of the cumulative projects are anticipated to significantly affect the population and housing resources within the City. Since the proposed project will not generate a need for housing there would be no cumulative impact to housing resources.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	The proposed project may generate some new jobs associated with the school expansion. Additional staff may include teachers, administrative, and support staff. However, RDV is an existing active middle school, so new jobs associated with the proposed project would be minimal. Most or all the potential additional staff could be hired from the existing qualified applicant pool already residing within or within reasonable commuting distance of the RSD. However, if teachers or other staff are hired outside the RSD area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the local population. Given the location of the project Site within an existing developed urban environment, the proposed project is not anticipated to be growth inducing outside of what is anticipated in the City of Oxnard General Plan (City of Oxnard 2016) and Ventura County General Plan (County of Ventura 2020a). Therefore, project impacts would be less than significant.		
<i>Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</i>	Less than Significant Impact. The proposed project is a middle school expansion resulting in the addition of 250 students to an existing middle school and would therefore not result in the displacement of people or housing. Therefore, no construction or replacement housing would be necessary and project impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
<i>Cumulative Population and Housing Impacts</i>	Less than Significant Impact. The proposed project would not add a substantial number of new jobs. The students and staff located in the	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	expanded middle school facilities are included in existing and forecasted population growth for the City of Oxnard. The proposed project would support existing and future students and infrastructure improvements would not indirectly cause an increase in population growth. Therefore, proposed project contribution for a cumulative impact would be less than significant.		

3.15 Public Services

<p><i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:</i></p> <p><i>i.) Fire Protection?</i></p>	<p>Less than Significant Impact. The Site is located in unincorporated Ventura County. However, City of Oxnard Fire Station 7 is the initial responding station based on mutual aid agreements between the City of Oxnard and Ventura County. The proposed project would be designed and constructed to meet required fire standards that would include adequate emergency vehicle access. Construction would comply with OSHA and Fire and Building Codes. The Oxnard Fire Department has been consulted regarding project Site design, access, and fire hydrants.</p> <p>Operation of the middle school facility is anticipated to generate a typical range of service calls including fire suppression, emergency medical, and emergency rescue requests for service. Fire Station 7, located at 3300 Turnout Park Circle, which houses Engine 67, is 1.2 miles from the project Site. This station is close enough to provide fire protection and hazardous materials response services within a reasonable response, or “turnout” time in accordance with local goals and policies. The travel time goal for a first response is 4 minutes (240 seconds). For the</p>	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>period January 1, 2021 to September 1, 2022, turnout time for Engine 67 was 382 seconds (6 minutes and 36 seconds) and met the goal of 240 seconds approximately 15% of the time out of 312 service calls (City of Oxnard 2022c). Within that time period, no calls were documented from the project Site. While the response times for the initial responding fire station are slightly outside the goal time for first response, the incremental increase in fire response requirements associated with the proposed project is anticipated to be negligible and would not result in the need for new or altered facilities. Further, given the presence of County Fire Station 51, collocated with City Fire Station 7, service ratios would continue to be acceptable. Therefore, project impact on fire protection services would be less than significant.</p>		
ii.) Police Protection?	<p>Less than Significant Impact. The RSD and its construction manager shall direct the contractor to properly fence the project Site during construction of the middle school facilities. The fence will help to reduce the potential for materials and equipment to be targets of theft that could result in a need for increased police services during construction.</p> <p>The existing and expanded middle school facilities will continue to be within the service boundary of the Ventura County Sheriff's Department until annexation into the City of Oxnard, at which time service will be provided by the Oxnard Police Department. The middle school facilities are proposed to accommodate both existing and anticipated future enrollment. Public funds, such as property taxes, would be used to cover the</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	incremental costs associated with providing police services for future enrollment at the middle school facilities. The proposed project would not require the expansion of existing police facilities or the construction of new facilities. As a result, the proposed project would result in a less than significant impact related to police protection during construction and long-term operation.		
iii.) Parks?	<p>Less than Significant Impact. Demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. No housing is planned as a part of the proposed project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all of the additional staff could be hired from the existing qualified applicant pool already residing within or near the RSD. However, if teachers or other staff are hired outside the RSD area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the local population. The proposed project is needed to accommodate existing and anticipated future enrollment in RSD and includes recreational facilities designed to meet the recreational needs of students and faculty on-site. Recreational facilities to be provided on the expanded campus include a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	restroom/storage building, and up to 10 tennis courts and/or pickleball courts. The recreational facilities will be available to the public outside of school hours and will likely lessen the physical impacts/demand on nearby park and recreational facilities as opposed to increasing the demand. New park facilities will not be needed; therefore, project impact would be less than significant.		
Cumulative Impacts Public Services	<p>Less than Significant Impact.</p> <p>Fire and Police Protection</p> <p>The proposed project would cause an incremental increase in demand for fire and police protection services. Consistent with General Plan Policy ICS-1.3, the City will continue to utilize developer fees, public facilities fees, and other methods (e.g., grant funding or assessment districts) to finance public facility design, construction, operation, and maintenance to ensure adequate levels of service (City of Oxnard 2017). Therefore, proposed project contribution to cumulative impacts for fire and police protection services would be less than significant.</p> <p>Parks</p> <p>The proposed project is a middle school expansion that would provide adequate recreational facilities on Site to meet students' educational needs. Increased demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. City of Oxnard Municipal Code Chapter 13 Article IV includes a park</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	acquisition and development tax for each new dwelling unit. The revenue collected from this tax goes into the park acquisition and development fund. No housing is planned as a part of the proposed project, and a minimal increase in the local population is expected. Additionally, recreational facilities proposed for community use would have a positive cumulative effect on park facilities. Therefore, proposed project contribution to cumulative impacts for parks would be less than significant.		

3.16 Transportation

<i>Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?</i>	<p>Potentially Significant Impact. As noted above, the 2016–2040 RTP/SCS, addresses all modes of our transportation system, and reflects research and policy initiatives from each mode: active transportation, aviation and airport ground access, corridor planning, goods movement, high-speed rail, intelligent transportation systems, safety and security, transit, and transportation finance (SCAG 2017). The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. Table 3-28 provides a project consistency analysis with relevant 2016 RTP/SCS goals identified by SCAG.</p> <p>A TCS was prepared for the proposed project (see the TCS in Appendix I). As part of the TCS, traffic counts were collected at one roadway segment and nine intersections for a.m. and p.m. peak hours. Trip generation estimates were determined</p>	<p>TRAF-1: School Traffic Management Plan (TMP). RSD develop a school TMP to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps).</p> <p>TRAF-2: Rose Avenue/Walnut Drive Intersection. The County's Local Roadway Safety Plan provides several general countermeasures focused on making the path of travel clearer, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and</p>	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>for the project Site based on anticipated enrollment and standard trip generation rates. The trip generation was coordinated with City of Oxnard staff. Trips were distributed based on school routes and student information. The TCS calculated intersection LOS for existing conditions and cumulative conditions with and without the proposed project. Cumulative conditions were developed based on a list of related (approved and pending) projects provided by City of Oxnard staff and 2030 General Plan traffic data from the Oxnard Traffic Model (OTM).</p> <p>Project Trip Generation</p> <p>Middle School. The existing middle school has a student enrollment of 819 students. The project could potentially result in a 250-student increase. Trip generation estimates for the middle school were calculated based on rates contained in the Institute of Transportation Engineers (ITE) <i>Trip Generation Manual</i> (ITE 2017) for <i>Land Use #522 – Middle School/Junior High School</i>.</p> <p>District Transportation and Parking Facility. The project also includes the relocation of the DTPF from E. Vineyard Avenue to N. Rose Avenue. While the relocation would not add traffic to the regional roadway network, it would divert bus and employee trips to the immediate vicinity of the middle school site and its driveways. The DTPF operational statistics provided by RSD are as follows:</p> <ul style="list-style-type: none"> 17 school buses in service. All buses will be parked at the DTPF. 	<p>painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement, which will require a longer mast arm, and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times. This may require modifications to the northeast corner (ADA improvements, installation of pedestrian push button post).</p> <p>TRAF-3: Auto Center Drive/Collins Street Intersection (Project-Specific and Cumulative). The project-specific analysis found that the proposed project would contribute to the delays experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. The low side</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<ul style="list-style-type: none"> Bus traffic consists of 13 a.m. bus routes, four midday bus routes and 13 p.m. bus routes, for a total 30 buses per school day. Total of 10 office/maintenance employees, work times 6:30 a.m. to 3:30 p.m. <p>The existing middle school is served by six school buses which currently enter the Site and leave to the existing facility on E. Vineyard Avenue after dropping off students. In the future, these six buses will leave the Site to start student pick-up routes and remain on the Site after returning to drop off students.</p> <p>As shown in Table 3-29, the project is expected to generate 792 ADT, with 198 trips occurring in the a.m. peak hour and 48 trips occurring in the p.m. peak hour.</p> <p>Project Trip Distribution</p> <p>The project trip distribution for new students is based on the school's attendance boundary illustrated in the TCS (Exhibit 5), with a smaller percentage of trips generated from outside the attendance boundary by new school employees. There is no indication that existing bus routes are subject to change, thus the regional distribution of DTPF trips would not change except in the immediate vicinity of the Site. The distribution percentages are shown in the TCS (Exhibit 6). The site access changes (addition of full-access driveway on Collins Street) would result in changes to existing middle school traffic patterns, where traffic from and to the south now have the option to use the new driveway on Collins Street instead of the existing driveways on Rose Avenue.</p>	<p>street volumes (76 peak hour trips in the p.m. peak hour) and delays would not satisfy any traffic signal warrants. The southbound approach is controlled by a stop sign and contains a shared left-right turn lane. Prohibiting parking along the west curb extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole, however the southbound approach would continue to operate at LOS D. Similarly existing plus project conditions, the southbound approach would continue to operate at LOS D after the restripe to separate turning lanes. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. The intersection would not satisfy traffic signal warrants under cumulative plus project conditions.</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Exhibit 7 in the TCS shows the anticipated existing diverted traffic volumes and Exhibit 8 in the TCS shows the project-added traffic volumes. Exhibit A in Appendix 2 of the TCS shows the separate middle school trips and District maintenance/bus trips.</p> <p>Existing Plus Project Roadway and Intersection Operations</p> <p>Project generated traffic was added to the existing peak hour traffic volumes and levels of service were recalculated for existing plus project conditions. The existing plus project traffic volumes are illustrated in the TCS (Exhibit 9). Table 3-30 and Table 3-31 summarize the level of service calculations for existing plus project-specific conditions.</p> <p>Table 3-30 and Table 3-31 indicate that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range, and that the study-area intersections would continue to operate in the LOS A-C range except the Auto Center Drive/Collins Street intersection, which operates at LOS D. The proposed project would contribute to the delays experienced on the stopped approach (Collins Street). Mitigation Measures TRAF-1, TRAF-2, and TRAF-3 have been added to reduce potentially significant project-specific traffic impacts to a less than significant level.</p> <p>Cumulative Conditions</p> <p>The City of Oxnard requires that the study-area intersections are analyzed assuming cumulative</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>traffic conditions, which include traffic that could be generated by other developments in the study area that are expected to be constructed in the near future. The following section discusses the cumulative (existing conditions plus approved and pending projects) conditions.</p> <p>Cumulative Projects Trip Generation and Distribution</p> <p>The cumulative (existing plus approved and pending projects) conditions serves as a near future baseline to assess potential impacts generated by the proposed project. Cumulative traffic volumes were developed based on approved and pending projects information provided by City of Oxnard and County of Ventura staff.</p> <p>A list of approved and pending development projects in the City of Oxnard was provided by City staff (City of Oxnard 2022a). The location map and <i>Development Project List</i> information for the approved and pending projects is included in Appendix 4 of the TCS. The County's Resource Management Agency (RMA) staff provided a parcel map with approved and pending projects within a five-mile radius of the project site. The parcel map information was compared with the project information contained in the County's Approved Projects list and the Pending Project list (County of Ventura 2022b).</p> <p>Trip generation estimates for the approved and pending projects were developed based on rates contained in the ITE Trip Generation Manual and trips were distributed based on the location of</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>each project, project distribution data contained in traffic studies completed for several approved and pending projects, and existing traffic patterns in the study area. The cumulative-added volumes are illustrated in Exhibit B in Appendix 2 of the TCS and the cumulative (existing plus approved and pending) traffic volumes are illustrated in the TCS (Exhibit 10).</p> <p>Short-Term Future Improvement Projects</p> <p>The County's short-term improvements (2023–2027 Capital Improvement Program [CIP]) include the following projects:</p> <ul style="list-style-type: none"> • El Rio Sidewalk Improvements: Construction of sidewalks and intersection improvements on various roads within the El Rio area. This project is associated with the RDV Safe Routes to School (SRTS) program. • Rose Avenue Bike Lanes (Collins-Simon): Construction of Class II bike lanes on Rose Avenue from Collins Street to Simon Way. This will include pavement overlay and bike lane striping improvements on Rose Avenue from south of Collins Street to North of Simon Way, installation of speed feedback signs and other signing additions. <p>Cumulative Plus Project Roadway and Intersection Operations</p> <p>The cumulative plus project traffic volumes are illustrated in the TCS (Exhibit 11). Intersection levels of service were recalculated assuming cumulative and cumulative plus project conditions. Table 3-32 and Table 3-33 summarize</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>the cumulative plus project level of service calculations.</p> <p>Tables 3-32 and 3-33 indicate that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range under cumulative and cumulative plus project conditions. The intersections located in the County are forecast to operate in LOS A-B range, except the Rose Avenue/Orange Drive intersection, which would operate at LOS D in the a.m. peak hour. LOS D is acceptable along throughfares. The intersections located in the City of Oxnard are forecast to operate in the LOS A-C range, except the Auto Center Drive/Collins Street intersection, which would operate at LOS D.</p> <p>Project Site Access and Circulation</p> <p>As illustrated in Exhibit 2 of the Oxnard-Camarillo Greenbelt agreement, access to the school student drop-off/pick-up loop on Rose Avenue will be provided via the existing ingress only driveway on Rose Avenue opposite Orange Drive and the existing egress only driveway on Rose Avenue opposite Walnut Drive. A new right-turn only driveway located south of Orange Drive will provide access to Parking Lot A. Two driveways located on Rose Avenue north of Walnut Drive will provide access to Parking Lot B. Two new driveways are proposed on Collins Drive. The driveways provide access to Parking Lot A, the school bus drop-off/pick-up lane and the DTPF.</p> <p>Field review of school traffic during the morning commute period indicated that the existing drop-off loop system with ingress from the Rose</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Ave/Orange Dr intersection backs up during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area.</p> <p>The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Avenue/Collins Street intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF.</p> <p>It is recommended that RSD develop a school traffic management plan (TMP) to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps).</p> <p>A continuous sidewalk is provided along the east side of Rose Avenue from Auto Center Drive to the middle school that connects to the school's</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>internal pedestrian facilities. Crosswalks are provided at the signalized intersections at Collins Street and Walnut Drive. As discussed, the County's 2023–2027 CIP includes several projects in the El Rio neighborhood that will improve pedestrian and bicycle access to the middle school. The Rio Del Valle SRTS assessment identified locations for construction of (infill) sidewalks, intersection curb extensions and traffic calming measures along students walking corridors to promote walking to school. A new sidewalk will be constructed along the project frontage on Collins Street that connects to an ADA pedestrian sidewalk system on the project Site.</p> <p>The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. The project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. The SRTS improvement exhibit and Rose Avenue Bike Lanes project exhibits are included in Appendix 3 of the TCS.</p> <p>Bicycle Access. The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. This project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. Consideration should be given to install buffered bicycle lanes where feasible to provide increased separation between vehicle and bicycle lanes.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Traffic signal improvements at the Rose Avenue/Walnut Drive intersection should include timing verification to accommodate bicycle movements. Improvements on Collins Street may include provision of Class II bike lanes or installation of sharrows and shared road signage.</p> <p>The on-Site bicycle circulation system should connect to the bicycle lanes on Rose Avenue and Collins Street. The on-Site bicycle route should be clearly designated via striping and signage on the project driveways, and bicycle parking areas should be easily accessible and located in proximity of middle school buildings.</p> <p>Pedestrian Access. A continuous sidewalk is provided along the east side of Rose Avenue from Auto Center Drive to the middle school that connects to the school's internal pedestrian facilities. Crosswalks are provided at the signalized intersections of Rose Avenue at Collins Street and Walnut Drive. As discussed, the County's 2023-2027 CIP includes several projects in the El Rio neighborhood that will improve pedestrian and bicycle access to the middle school. The Rio Del Valle SRTS assessment identified locations for construction of (infill) sidewalks, intersection curb extensions and traffic calming measures along students walking corridors to promote walking to school. A new sidewalk will be constructed along the north side of Collins Street that connects to an ADA pedestrian sidewalk system on the Site.</p> <p>Pedestrian connections will be provided between the frontage sidewalks and the middle school's</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>internal sidewalk and walkway circulation system. Pedestrian connections should be provided at or nearby each middle school driveway on Rose Avenue and Collins Street to ensure a clear and direct pathway into the Site.</p> <p>School Bus Transportation</p> <p>The proposed project includes the relocation of the DTPF from E. Vineyard Avenue to N. Rose Avenue. While the relocation would not add traffic to the regional roadway network, it would divert bus and employee trips to the immediate vicinity of the Site and its driveways. The DTPF operational statistics provided by RSD are as follows:</p> <ul style="list-style-type: none"> • 17 school buses in service. All buses will be parked at the facility. • Bus traffic consists of 13 a.m. bus routes, four midday bus routes, and 13 p.m. bus routes, for a total 30 buses per school day. • Total of 10 office/maintenance employees, work times 6:30 a.m. to 3:30 p.m. <p>The existing middle school is served by six school buses which currently enter the Site and leave to the former facility on E. Vineyard Avenue after dropping off students. In the future, these six buses will leave the Site to start student pick-up routes and remain on the Site after returning to drop off students.</p> <p>Field review of school traffic during the morning commute period indicated that the existing drop-off loop system with ingress from the Rose Avenue/Orange Drive intersection backs up</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area.</p> <p>The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Avenue/Collins Street intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF.</p> <p>Buses will travel via designated routes with frequent stops within the school boundary area at the on-Site bus drop-off and pick-up area. Buses will arrive prior to start of bell schedule (i.e., 8:21 a.m.) and depart after end of regular bell schedule (i.e., 2:53 p.m.). The design of the school circulation system will incorporate school bus turning requirements (swept paths) along the on-Site bus route.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Parking</p> <p>Figure 2-3 indicates that the proposed parking supply consists of 339 standard spaces, 16 accessible spaces, and 24 bus spaces for a total of 379 spaces. Parking Lot A will contain 214 standard spaces and 10 accessible spaces for a total of 224 spaces. Parking Lot B contains 91 standard spaces and 4 accessible spaces for a total of 95 spaces. The DTPF contains 34 standard spaces, 2 accessible spaces, and 24 bus spaces for a total of 60 spaces. The County of Ventura parking requirement (Municipal Code Division 8, Article 6) for schools (Elementary, Junior High, Middle) is 1 space per 8 students of planned capacity. With a planned capacity of 1,069 students (819 current students plus 250 potential student increase), the parking requirements would be 134 parking spaces.</p> <p>Incorporation of Mitigation Measures TRAF-1, TRAF-2, and TRAF-3 would reduce all potentially significant impacts related to transportation to a less than significant level.</p> <p>Rose Avenue/Walnut Drive Intersection</p> <p>The intersection is controlled by a traffic signal with permissive phasing (green ball) on all approaches, and detection (loops) on the east and west approaches. The northbound approach on Rose Avenue contains a separate left-turn lane and two through lanes, the southbound approach contains a through lane and a shared through/right-turn lane, the eastbound approach (Walnut Drive) has one shared left/right-turn lane, and the westbound approach is the middle school</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>exit driveway with one shared left-turn/through/right-turn lane. School crosswalks are provided on the west and north side of the intersection (ladder crosswalks) and on the east side (basic stripe). Advanced school speed limit signage with speed feedback sign and overhead flashing beacons are provided on Rose Avenue in both directions.</p> <p>Review of the intersection recent five-year collision history (2017–2021) shows a total of nine collisions with several correctable accidents: three broadsides, three rear-ends, and an improper turn. One pedestrian ROW violation was reported in 2021 (eastbound right-turn vs. southbound pedestrian in crosswalk).</p> <p>The County's Local Roadway Safety Plan provides several general countermeasures focused on making the path of travel clearer, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). As discussed previously, the Rose Avenue Bike Lanes (Collins-Simon) project will install Class II bike lanes on Rose Avenue, which would improve bicycle traffic conditions.</p> <p>Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement, which will require a longer mast arm, and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times. This may require modifications to the northeast corner (ADA improvements, installation of pedestrian push button post).</p> <p>Improvement Measures</p> <p>The project-specific analysis found that the project may contribute to the delays experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. The low side street volumes (76 peak hour trips in the p.m. peak hour) delays would not satisfy any traffic signal warrants. The southbound approach is controlled by a stop sign and contains a shared left-right-turn lane. Prohibiting parking along the west curb extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole; however, the southbound approach would continue to operate at LOS D. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. Table 3-34 shows the mitigated intersection levels of service.</p> <p>It is recommended that RSD develop a school TMP to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents, and staff (education, traffic control, physical measures such as speed bumps).</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Several general countermeasures have been identified by the County for the Rose Avenue/Walnut Drive intersections, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times, including ADA improvements and installation of pedestrian push button post) on the northeast corner.</p> <p>The cumulative analysis indicated that the Rose Avenue/Orange Drive intersection would operate at LOS D in the a.m. peak hour, which is acceptable along throughfares. The Auto Center Drive/Collins Street intersection would operate at LOS D without and with project traffic. Similarly existing plus project conditions, the southbound approach would continue to operate at LOS D after the restripe to separate turning lanes. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. The intersection would not satisfy traffic signal warrants under cumulative plus project conditions. Table 3-34 shows the mitigated intersection levels of service.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<p><i>Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</i></p>	<p>Less than Significant Impact.</p> <p>Vehicle Miles Traveled (VMT)</p> <p>State SB 743 (2013), which was codified in Public Resources Code section 21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (<i>Id.</i>, subd. (b)(1); see generally, adopted CEQA Guidelines, §15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (Agency) has certified and adopted, changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project's transportation impacts.</p> <p>A project would have a significant effect on the environment if it would cause substantial additional VMT. The OPR <i>Technical Advisory on Evaluating Transportation Impacts in CEQA</i> (OPR 2018) recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets screening criteria, then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required.</p>	<p>No mitigation is required.</p>	<p>Less than Significant Impact</p>

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends quantified thresholds for these land uses for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In general, the recommended “Threshold of Significance” is if a proposed project exceeds a level of 15% below existing regional VMT for that type of project, a significant transportation impact may be generated. However, for other uses (i.e., retail projects), a net increase in total VMT may indicate a significant transportation impact.</p> <p>VMT Analysis</p> <p>A VMT analysis was prepared by Stantec for the proposed project (Stantec 2022a). The VMT analysis is included in Appendix I of this EIR. The school portion of the proposed project is the dominant use and meets the locally serving screening criteria; therefore, the proposed project is presumed to have a less than significant impact at the project level. Furthermore, the DTPF portion of the proposed project would also be less than significant on a stand-alone basis based on both the small project screening criteria and the locally serving screening criteria. Since the proposed project would have a less than significant impact at the project level, the proposed project would have a less than significant impact at the cumulative level per OPR’s Technical Advisory. The proposed project was also determined to be</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>consistent with regional plans and to not impact active transportation or transit use.</p> <p>Induced Automobile Travel Analysis</p> <p>A project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network. OPR's proposed transportation impact guidelines includes a list of transportation project types that would not likely lead to a substantial or measurable increase in VMT. If a project fits within the general types of projects (including combinations of types), then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required.</p> <p>The proposed project is not a transportation project. While the project would improve or reconstruct existing facilities, no new capacity or network changes are anticipated, and impacts would be less than significant.</p>		
<p><i>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)?</i></p>	<p>Less than Significant Impact. The proposed project would be designed and constructed to meet required standards. Sight distance at the project accesses would comply with standard Caltrans and City of Oxnard sight distance standards. The final grading, landscaping, and street improvement plans would demonstrate that sight distance standards are met. Such plans would be reviewed by the City and approved as consistent with this measure prior to issuance of the grading permits. No slope or object over 30</p>	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	inches would be in the line of sight area. Per the TCS (Appendix I), there would be no increase in hazards due to a design feature or incompatible uses. Therefore, with compliance with existing regulations, project impact would be less than significant, and no mitigation is required.		
<i>Would the project result in inadequate emergency access?</i>	Less than Significant Impact. The proposed project would not restrict or reduce emergency access to the project Site. The proposed project would be designed and constructed to meet required standards including adequate emergency access. All driveways would be designed according to City standards to facilitate emergency vehicle access. As part of standard development procedures, Site plans would be submitted to the City for review and approval to ensure adequate emergency access prior to construction. Therefore, with compliance with existing requirements, project impact would be less than significant, and no mitigation is required.	No mitigation is required.	Less than Significant Impact
<i>Cumulative Impacts</i> <i>Transportation</i>	<p>Potentially Significant Impact. The cumulative (existing plus approved and pending projects) conditions serves as a near future baseline to assess potential impacts generated by the proposed project. Cumulative traffic volumes were developed based on approved and pending projects information provided by City of Oxnard and County of Ventura staff.</p> <p>A list of approved and pending development projects in the City of Oxnard was provided by City staff (City of Oxnard 2022a). The location map and <i>Development Project List</i> information for the approved and pending projects is included in</p>	See Mitigation Measure TRAF-3 above.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>Appendix 4 of the TCS. The County's RMA staff provided a parcel map with approved and pending projects within a five-mile radius of the project Site. The parcel map information was compared with the project information contained in the County's Approved Projects list and the Pending Project list (County of Ventura 2022b).</p> <p>Trip generation estimates for the approved and pending projects were developed based on rates contained in the ITE Trip Generation Manual and trips were distributed based on the location of each project, project distribution data contained in traffic studies completed for several approved and pending projects, and existing traffic patterns in the study area. The cumulative-added volumes are illustrated in Exhibit B in Appendix 2 of the TCS and the cumulative (existing plus approved and pending) traffic volumes are illustrated in the TCS (Exhibit 10).</p> <p>Intersection LOS were recalculated assuming cumulative and cumulative plus project traffic conditions. The LOS calculations indicate that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range under cumulative and cumulative plus project conditions. The intersections located in the County are forecast to operate in LOS A-B range, except the Rose Avenue/Orange Drive intersection, which would operate at LOS D in the a.m. peak hour. LOS D is acceptable along throughfares. The intersections located in the City of Oxnard are forecast to operate in the LOS A-C range, except the Auto Center Drive/Collins Street intersection, which</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>would operate at LOS D. Mitigation Measure TRAF-3 has been added to reduce potentially significant cumulative traffic impacts to a less than significant level.</p> <p>The City of Oxnard Public Works Division collects traffic impact fees based on project generated traffic that would impact roadways within the City's jurisdiction. Standard conditions of permit issuance initiate collection of these fees for all projects within the City of Oxnard, regardless of whether the project is a private or a public project.</p>		
3.17 Tribal and Cultural Resources			
<p><i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i></p> <p>i.) <i>Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</i></p> <p>ii.) <i>A resource determined by the lead agency, in its discretion</i></p>	<p>Potentially Significant Impact during Construction. Based on the cultural resource study for the proposed project that included a SCCIC record search, NAHC SLF search, and Phase I archaeological survey (Tetra Tech 2022a, see Section 3.5), no CRHR historical resources or local historical resources listed or eligible for listing were identified within the project Site.</p> <p>As specified in AB 52/SB 18, notification letters were provided to the six tribes listed above in Section 3.17.2.1.</p> <p>RSD received a letter dated September 13, 2022 from the Santa Ynez Band of Chumash Indians requesting no further consultation on this proposed project. Consultation is still pending with the other five Chumash tribes.</p>	See Mitigation Measure CUL-2 and CUL-3 above.	Less than Significant Impact
	<p>Potentially Significant Impact during Construction. As discussed previously, the RSD</p>	See Mitigation Measure CUL-2 and CUL-3 above.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>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.</i>	submitted project notification letters to 11 Native American tribal individuals and representatives identified by AB 52 and SB 18 NAHC tribal contact list. RSD received a letter dated September 13, 2022 from the Santa Ynez Band of Chumash Indians requesting no further consultation on this proposed project. Consultation is still pending with the other five Chumash tribes.		
<i>Cumulative Tribal and Cultural Resources Impacts</i>	<p>Potentially Significant Impact during Construction. Based on the cultural resource study (Tetra Tech 2022a) and tribal consultation, no tribal cultural resources have been identified within the project Site or within the immediate vicinity. As referenced in Section 3.5.2, the project Site is within the coastal and Oxnard Plain region that has been inhabited by the Chumash who lived, traded, traveled, and exploited various coastal and inland resources for subsistence and utilitarian resources. For the analysis, the geographic scope for cumulative cultural resources impacts is considered the City of Oxnard within the Oxnard Plain.</p> <p>Development of the proposed project, in combination with other cumulative projects in the area, has the potential to contribute to a cumulatively significant tribal cultural resources impact due to the potential loss of such resources unique to the region. However, the CEQA review process and AB 52 and SB 18 consultation with Native American tribes to identify tribal cultural resources would be required for future projects</p>	See Mitigation Measure CUL-2 and CUL-3 above.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>that have the potential to cause significant impacts to tribal cultural resources. In addition, mitigation measures are included in this EIR to reduce potentially significant impacts to unknown tribal cultural resources that could be encountered during construction of the proposed project. Implementation of Mitigation Measures CUL-2 and-3 and existing state laws regarding human remains would reduce the proposed project's incremental potential impacts to tribal cultural resources to a less-than-significant level and ensure that proposed project impacts to tribal cultural resources are not cumulatively considerable.</p> <p>With implementation of the two mitigation measures and existing state laws, as described above, the proposed project would not result in significant impacts to tribal cultural resources. Given this minimal impact, as well as similar mitigation requirements for other projects in the City of Oxnard, the proposed project's incremental effect is not cumulatively considerable when viewed in connection with the effects of other closely related past projects, the effects of other current projects and the effects of probable future projects and thus cumulative impacts to tribal cultural resources would be less than significant.</p>		

3.18 Utilities and Service Systems

<i>Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power,</i>	Less than Significant Impact. The proposed project's southern campus expansion area will obtain potable water from a new connection to the City of Oxnard water system. The anticipated point of connection would be from an existing City	No mitigation is required.	Less than Significant Impact
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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<p><i>natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</i></p>	<p>water line located in the Rose Avenue or Collins Steet ROW. An approximately 8-inch diameter water line would deliver water from the City line to the proposed southern campus expansion area. At the time of this writing, it is anticipated that the improvements proposed on the existing campus parcel will utilize water supply from existing allocations and service lines. It is anticipated that the northern campus expansion area will continue to utilize agricultural water from current groundwater well sources.</p> <p>Jensen prepared a technical memorandum for water demand and allocations for the proposed project school expansion (Jensen 2022b) that calculated the water demand for the proposed expansion to be 48.574 AFY. As shown in Table 3-37, Final Build-Out water usage for buildings (classrooms, restrooms, library, etc.), would represent an increase of 1.846 AFY from the existing 3.027 AFY, to 4.873 AFY, a 61% increase over existing conditions. The RSD proposes to replace all existing and new sports fields with xeriscape and high efficiency landscaping, which will result in a decrease of 83% from an existing 27.33 AFY to 4.654 AFY, a reduction of 22.676 AFY.</p> <p>The northern campus expansion area includes a 10-acre farm which will require irrigation water for crops. Using the FCGMA Crop Year Irrigation Allowance Table, and assuming the crops are avocados with 20–70% ground shading and typical precipitation, the farm will require 2.0 acre-feet/acre. Given that the farm is 10 acres, this</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>results in 20 AFY demand for the new farm (Jensen 2022b).</p> <p>Table 3-39 provides full build-out water consumption projections of all proposed uses (Buildings, Landscaping, Agricultural Use, and Bus Wash). Total RSD water demand is estimated at 48.574 AFY. FCGMA water allocations, including existing allocations and water that will be transferred to RSD with the newly acquired land, would result in a total of 66.275 AFY. With the total water allocations associated with the proposed project campus expansion, RSD would have a net surplus of 17.701 AFY.</p> <p>Considering that the proposed project would result in a net decrease in water use from current levels and will consume over 17.70 AFY of water less than the total water supply allocated for the middle school property, the proposed project would not require or result in the relocation or construction of new or expanded water facilities. Therefore, impacts would be less than significant.</p> <p>At the time of developing this Draft EIR, the precise routing of the storm water drainage features and discharge location to Collins Street had not been finalized. Through a combination of stormwater control measures, proposed project impacts on stormwater drainage facilities would be less than significant.</p> <p>The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient LED lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The project Site parking lot and pathway pole-mounted lighting and sports field lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the proposed project will be an energy-efficient type complying with the most recent energy code.</p> <p>The proposed project will connect to the existing 8-inch Southern California Gas main line currently serving the existing middle school. Natural gas will be used to power various assets including appliances, such as stoves and ovens, and equipment, such as water heaters, boilers, and classroom heaters (furnaces). The proposed project is planned to connect to existing utility lines and local telecommunication providers and is not anticipated to require the construction or relocation of electric power, natural gas, or telecommunication facilities. The project Site area is adjacent to existing service infrastructure and will make any required upgrades to connect to existing utility lines and providers. Utility providers within the City are included on the distribution list for the environmental documents pertaining to the proposed project (including the IS). Therefore, project impact would be less than significant.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</i>	Less than Significant Impact. As discussed above and shown in Table 3-39, the combined water demand for the RSD, including the Rio Real School landscaping, full build-out of RDV, including landscaping and buildings, the proposed northern campus expansion area, and the southern campus expansion area bus wash, would be 48.754 AFY. With existing and acquired allocations from the northern and southern campus expansion areas, total water allocations are 66.275 AFY, representing a 17.701 AFY surplus. Even with scheduled cutbacks in supply and extractions by the City and the various water agencies, the proposed project is anticipated to have sufficient water supplies for the reasonably foreseeable future. Further, as described above, the City anticipates that the AWPf will provide up to 11,900 AFY of recycled water for IPR. The recently announced \$48 million WIFIA EPA loan will support the City's Aquifer Storage Recovery Project which will help to expand the City's recycled water supply. These programs will supplement the already substantial water supply allocation of the proposed project. Therefore, project impacts to water supply would be less than significant.	No mitigation is required.	Less than Significant Impact
<i>Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</i>	Potentially Significant Impact. Proposed average sewer generation is estimated as a factor of the site's water demand. Water demand was calculated in the Proposed Rio Del Valle School Expansion Domestic Water Demand and Allocations Technical Memorandum prepared by Jensen (Jensen 2022b). Table 3-40 shows the	UTIL-1: RSD shall submit the anticipated sewer flow rates for the proposed project to the City so that it can be analyzed using the City's sewer model. Based on the results, RSD shall coordinate with the City regarding the final sewer design	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>expected water demands for the Site's wastewater-producing sources.</p> <p>Per the City's Wastewater Rate Sheet effective September 1, 2021 (Appendix 5.3), schools are charged assuming an 85% rate of water return. Therefore, it is estimated that wastewater flows generated by domestic metered project Site areas will be 85% of their water demands.</p> <p>It is estimated that 25% of bus wash water demand will discharge to the City's sewer system. Although RSD will be required to recycle wash water, some wastewater is expected from maintenance activities such as back flushing filters. Based on these assumptions, project-generated wastewater production is estimated at 5.339 AFY, or 4,766 gpd (Jensen 2022c).</p> <p>According to the City of Oxnard Wastewater Master Plan Update, the 15-inch line in Auto Center Drive has sufficient capacity to meet hydraulic requirements for its projected ultimate demand. The 8-inch main upstream in Via Estrada and Collins Street was not evaluated as part of the Jensen study. Additionally, the project Site falls outside of the Master Plan Update Study Area and therefore was not considered a potential contributor to the City's wastewater system.</p> <p>The increase in sewer flow due to the proposed project was analyzed to show its impact on existing infrastructure. It was assumed that the sewer main is at the maximum acceptable depth/diameter ratio for peak flows in the existing condition. The increase in sewer flow created by the proposed project was compared to the</p>	<p>including any required improvements needed to provide adequate sewer service to the project Site.</p>	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>assumed existing condition flowrate. Pipe capacity analysis results are included in Appendix 5.4 of the Sewer Preliminary Investigation (Jensen 2022c). Table 3-41 summarizes these pipe capacity analysis results.</p> <p>The increased flows do not produce a measurable increase in maximum flow depth. Therefore, the d/D ratio will not increase during peak wet weather flows, even if the existing condition is already at the maximum d/D ratio.</p> <p>The existing 8-inch sewer line that the project Site will connect to, as well as the 15-inch trunk line immediately downstream, meet City of Oxnard standards and capacity criteria. They are sufficiently sized to accommodate the needs of the proposed project.</p> <p>Therefore, the proposed project impacts on existing wastewater treatment facilities and sewer systems will be designed to meet City requirements. As part of standard development procedures, Site plans would be submitted to the City of Oxnard for review and approval to ensure adequate wastewater capacity prior to construction. Therefore, with the implementation of UTIL-1 and compliance with existing City of Oxnard requirements, project impact to wastewater capacity would be less than significant.</p>		
<i>Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or</i>	Less than Significant Impact. It is anticipated that the City of Oxnard will provide solid waste service during operation of the proposed project through the annexation process planned as part of the proposed project. CalRecycle provides solid	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>otherwise impair the attainment of solid waste reduction goals?</i>	<p>waste generation rates for school use. As shown in Table 3-42, based on a rate of 0.6 lbs/person/day for school use (CalRecycle 2022c), the existing RDV campus generates approximately 0.27 tons per day (tpd) of solid waste, and, assuming a 180-day school year, 48.01 tons per year (tpy). The proposed project at full build-out is assumed to potentially generate approximately 0.35 tpd and 62.64 tpy, an increase of 0.08 tpd over existing generation.</p> <p>As discussed in the Environmental Setting, the Toland Landfill has a permitted capacity of 2,500 tpd, the SVLRC has a capacity of 3,000 tpd, and the Del Norte MRF facility has a permitted capacity of 2,779 tpd of recyclable waste. With the expected 67% diversion rate mandated by AB 939, the amount of solid waste from the proposed project sent to area landfills would be reduced to approximately 0.11 tpd, accounting for approximately .005% and .004% of the daily capacities of Toland Road Landfill and SVLRC, respectively. Both these landfills would have adequate capacity to accommodate the incremental increase in solid waste generated by the proposed project. The landfill-diverted recyclable component would comprise .008% of the Del Norte MRF facility permitted capacity. Based on these assumptions for generation rates and diversion percentages accomplished by the proposed project, impacts to solid waste capacity would be less than significant.</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
<i>Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</i>	Less than Significant Impact. The RSD in general, and the RDV school in particular are currently in compliance with all federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed project would require continued conformance with these statutes and regulations, including continued participation of the RDV school in existing City recycling programs. Modification of the existing Waste Management Plan will also be required to include the proposed expanded facilities. All new construction will also be required to achieve the 65% diversion requirement per CALGreen standards. The revised plan must be prepared and submitted to the City of Oxnard Environmental Resources Division prior to the issuance of a building permit. Assuming the RDV school remains in compliance with the specified regulations and statutes regarding local management and reduction of solid waste, impacts to solid waste regulations would be less than significant.	No mitigation is required.	Less than Significant Impact
<i>Cumulative Utilities and Service Systems Impacts</i>	Less than Significant Impact. The General Plan considers probable future projects, each of which would have to undergo the CEQA process individually. The buildout of the proposed project must consider the demand of the proposed project within the CEQA process. The City of Oxnard UWMP is based on 2030 General Plan buildout, and therefore addresses cumulative impacts in nature. Additionally, the proposed project and all future development projects in the City will be required to comply with standard water conservation requirements of the City, State, and	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	<p>California Building Code. These include the use of low-flush toilets and urinals, compliance with statewide efficiency standards for shower heads and faucets, and insulation of pipes to reduce water used before hot water reaches equipment or fixtures. Given the proposed project's excess water supply allocation of 17.701 AFY over estimated project demand and therefore compliance with water neutrality as required by the City, the increase of demand on the City water supply will be mitigated. Storm water drainage, electric power, natural gas, and telecommunications facilities are proposed to connect to already existing systems and service providers. Solid waste disposal will be provided by existing carriers. Solid waste generation represents a very small fraction of overall City permitted landfill and recycling facility capacity, and the proposed project would not result in a significant cumulative impact to waste disposal facilities. Per CALGreen requirements, a minimum of 65% of nonhazardous construction and demolition waste will be recycled and/or salvaged for reuse. The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when classrooms are unoccupied. The electrical systems will include energy-efficient LED lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The</p>		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	project Site parking lots and pathway pole-mounted lighting and sports field and court lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the proposed project will be an energy-efficient type complying with the most recent energy code. Therefore, cumulative impacts of the proposed project on utilities and service systems would be less than significant.		

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APPENDICES – VOLUME II

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

Appendix B: Air Quality Reports

Appendix C: Cultural Resources Report

Appendix D: Geotechnical Investigation Report

Appendix E: Phase I Environmental Site Assessments

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Appendix G: Supplemental Site Investigation

Appendix H: Water Resources System Reports

Appendix I: Traffic and Circulation Study and VMT Analysis

ACRONYMS/ABBREVIATIONS

Acronyms/Abbreviations	Definition
%	percent
AB	Assembly Bill
ADS	Advanced Drainage Systems, Inc.
ADT	Average Daily Trips or Average Daily Traffic
AG	Agriculture
AG/PR	Agricultural Planning Reserve
AFY	acre-feet per year
amsl	Above Mean Sea Level
AP	Alquist-Priolo
APAC	Agricultural Policy Advisory Committee
APE	Area of Potential Effect
AQMP	Air Quality Management Plan
ASCE	American Society of Civil Engineers
AST	above ground storage tank
AWPF	Advanced Water Purification Facility
BCC	(USFWS) Birds of Conservation Concern
bgs	Below Ground Surface
BMP	Best Management Practice
BP	Before Present
°C	degrees Celsius
CAAA	Clean Air Act Amendments of 1990
CAAQS	California Ambient Air Quality Standards
CAD	Computer-aided Drafting
Cadna	Computer Aided Noise Abatement
CalARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
CalEMA	California Emergency Management Agency
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board

Acronyms/Abbreviations	Definition
CBB	City Buffer Boundary
CBC	California Building Code
CCA	Civic Center Act
CCAA	California Clean Air Act
CCR	California Code of Regulations
cd	candela
C&D	construction and demolition
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CDMG	California Department of Conservation, Division of Mines and Geology
CE	Candidate Endangered
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
cfs/ac	cubic foot per second per acre
CGP	Construction General Permit
CGS	California Geological Survey
CH ₄	Methane
CHP	California Highway Patrol
CIE	International Commission on Illumination
CIP	Capital Improvement Program
CIWMP	County Integrated Waste Management Plan
City	City of Oxnard
CMA	Congestion Management Authority
CMP	Congestion Management Program
CMWD	Calleguas Municipal Water District
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
COPC	Chemical of Potential Concern
COS	Conservation and Open Space

Acronyms/Abbreviations	Definition
C-R	Community Reserve
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CURB	City Urban Growth Boundary
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
DDT	4,4'-DDT
DDW	Division of Drinking Water
DFIRM	Digital Flood Insurance Rate Map
DMG	Division of Mines and Geology
DOA	Department of Airports
DOGGR	Division of Oil, Gas, and Geothermal Resources
DOT	Department of Transportation
DSA	Division of the State Architect
DSL	digital subscriber line
DSOD	Division of Safety of Dams
DTPF	District Transportation and Parking Facility
DTSC	Department of Toxic Substances Control
DWR	(California) Department of Water Resources
EAP	Energy Action Plan
EIA	effective impervious area
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
EPRCRA	Emergency Planning and Community Right-to-Know Act
ESA	Endangered Species Act
ESP	Earth Systems Pacific
ET	evapotranspiration
FAR	Federal Aviation Regulations
fc	footcandle
FCGMA	Fox Canyon Groundwater Management Agency
FD	Federally Delisted
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map

Acronyms/Abbreviations	Definition
FMMP	Farmland Mapping and Monitoring Program
FP	CDFW Fully Protected
ft	foot or feet
ft ²	square foot
FTA	Federal Transit Administration
GDE	groundwater dependent ecosystem
GHG	greenhouse gas
GPA	General Plan Amendment
GPCD	gallons per capita per day
gpm	gallons per minute
GREAT	Groundwater Recovery Enhancement and Treatment
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWP	global warming potential
GYM	RDV Gymnasium
H ₂ S	hydrogen sulfide
HAZWOPER	Hazardous Waste Operations Emergency Response
HCM	Highway Capacity Manual
HFC	hydrofluorocarbon
HI	Hazard Index
HOA	homeowners' association
HSC	(California) Health and Safety Code
HSWA	Hazardous and Solid Waste Amendments Act
HVAC	Heating, Ventilation, and Air Conditioning
ICC	International Code Council
ICS	Infrastructure and Community Services
ICU	Intersection Capacity Utilization
IPR	indirect potable reuse
IS	Initial Study
ISAG	Initial Study Assessment Guidelines
ITE	Institute of Transportation Engineers
IWOP	Imported Water Outage Protocol
Jensen	Jensen Design & Survey
JP	Joint Partnerships
KMS	KMS Industries, Inc.

Acronyms/Abbreviations	Definition
LADWP	Los Angeles Department of Water and Power
LAFCo	Local Agency Formation Commission
LAS	Lower Aquifer System
lb/day	pounds per day
LCA	Land Conservation Act
LCC	Land Capability Classification
LED	light-emitting diode
L_{eq}	Equivalent Continuous Sound Level
LESA	Land Evaluation and Site Assessment
LID	low impact development
LIM	Land Inventory and Monitoring
L_{max}	maximum instantaneous noise level
LOS	Level of Service
LSA	LSA Associates, Inc.
LTS	Less Than Significant Impact
LTS/M	Less Than Significant with Mitigation
LUC	land use covenant
LUST	leaking underground storage tank
m^3	cubic meter
MBTA	Migratory Bird Treaty Act
μg	microgram
$\mu g/m^3$	micrograms per cubic meter
mg	milligram
MGD	million gallons per day
mg/kg	milligrams per kilogram
mg/m^3	milligrams per cubic meter
ML	Richter local magnitude
MLD	Most Likely Descendant
MMTCO _{2e}	million metric tons of CO ₂ equivalent
mph	miles per hour
MPO	Metropolitan Planning Organization
MPSP	Master Plans, Strategies, and Programs
MRF	material recovery facility
MRP	Mineral Resource Protection
MRR	mandatory reporting regulation

Acronyms/Abbreviations	Definition
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
msl	mean sea level
MT	metric tons
MTCO ₂ e	metric tons of CO ₂ -equivalent
MWD	Metropolitan Water District
N ₂ O	Nitrous Oxide
NAAQS	National Ambient Air Quality standards
NAHC	Native American Heritage Commission
NAS	Naval Air Station
NAT	Native American Tribe
NBVC	Navy Base Ventura County
NPS	National Park Service
NECSP	Northeast Community Specific Plan
NFA	No Further Action
NF ₃	nitrogen trifluoride
NFIP	National Flood Insurance Program
NHM	Natural History Museum
NI	No Impact
NO ₂	nitrogen dioxide
NOA	Notice of Availability
NOE	Notice of Exemption
NOI	Notice of Intent
NOP	Notice of Preparation
NOT	Notice of Termination
NO _x	nitrogen oxides (nitrogen oxide and nitrogen dioxide)
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
O ₃	ozone
OCP	organochlorine pesticide
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
O-H	Oxnard-Hueneme
OHP	Office of Historic Preservation
OMC	Oxnard Municipal Code

Acronyms/Abbreviations	Definition
OPR	Office of Planning and Research
OPSC	Office of Public School Construction
OS	Open Space
OSHA	Occupational Safety and Health Administration
OSHPD	Office of Statewide Health Planning & Development
OTM	Oxnard Traffic Model
OUHSD	Oxnard Union High School District
OWTP	Oxnard Wastewater Treatment Plant
P1+	Priority One plus
Pb	lead
PCB	polychlorinated biphenyl
PCSMP	Post-Construction Storm Water Management Plan
P.E.	physical education or Professional Engineer
PEA	Preliminary Environmental Assessment
PFC	perfluorocarbon
PGI	Provenience Group, Inc.
PHT	peak hour trip
PI	Public Information
PM	particulate matter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PM ₁₀	particulate matter less than 10 microns in diameter
POTW	publicly owned treatment works
ppb	parts per billion
ppm	parts per million
PRC	Public Resources Code
PRIMP	Paleontological Resource Impact Mitigation Program
R1PD	Single Family Residential Planned Development
RCRA	Resources Conservation and Recovery Act
RDR	Regulation and Development Review
RDV	Rio del Valle Middle School
REC	Recognized Environmental Concern
RHNA	Regional Housing Needs Assessment
RLM	Residential Low Medium
RMA	Resource Management Agency
ROW	Right-of-Way

Acronyms/Abbreviations	Definition
RPS	Renewable Portfolio Standard
RSD	Rio School District
RSL	Regional Screening Level
RSSIFSP	Revised Technical Memorandum Supplemental Site Investigation Field Sampling Plan
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
RZ	Pre-Zone
S	BLM Sensitive Species
S	Significant and Unavoidable
S ₁	1-second period
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SB18	State Senate Bill 18
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCC	South Central Coast
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCH	School
SCR-1	Santa Clara River Levee
SCS	Sustainable Community Strategy
SD	State Delisted; Storm Drain
SDS	Safety Data Sheet
SDWA	Safe Drinking Water Act
SF ₆	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SGMP	Sustainable Groundwater Management Plan
SHMA	Seismic Hazard Mapping Act
SIP	State Implementation Plan
SLF	sacred lands file
SMGB	State Mining and Geology Board
SO ₂	sulfur dioxide
SO ₄	sulfates
SOAR	Save Open Space and Agricultural Resources

Acronyms/Abbreviations	Definition
SOI	Sphere of Influence
SO _x	oxides of sulfur
sq. ft.	square feet
SRTS	Safe Routes to School
SSC	CDFW Species of Special Concern
SSI	Supplemental Site Investigation
SSIFSP	Supplemental Site Investigation Field Sampling Plan
SVLRC	Simi Valley Landfill & Recycling Center
SWP	State Water Project
SWPCP	Stormwater Pollution Control Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCS	Traffic and Circulation Study
TDS	total dissolved solids
TGM	Technical Guidance Manual
TMDL	Total Maximum Daily Load
TMP	traffic management plan
tpd	tons per day
TPH _c	crude oil range total petroleum hydrocarbons
TPH _d	diesel range total petroleum hydrocarbons
TPH _g	gasoline range total petroleum hydrocarbons
TPH _{h/m}	hydraulic oil/motor oil total petroleum hydrocarbons
TPPH	total purgeable petroleum hydrocarbons
tpy	tons per year
UAS	Upper Aquifer System
UBC	Uniform Building Code
URM	Unreinforced Masonry
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWCD	United Water Conservation District
UWMP	Urban Water Management Plan

Acronyms/Abbreviations	Definition
V/C	volume-to-capacity
VCA	Voluntary Cleanup Agreement
VCAPCD	Ventura County Air Pollution Control District
VCP	Voluntary Cleanup Program
VCPWA	Ventura County Public Works Agency
VCREA	Ventura County Regional Energy Alliance
VCTC	Ventura County Transportation Commission
VCWPD	Ventura County Watershed Protection District
VdB	vibration velocity level
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	waste discharge requirement
WIFIA	Water Infrastructure Finance and Innovation Act
WL	CDFW Watch List
WSCP	Water Shortage Contingency Plan
ZOI	Zone of Influence

1.0 INTRODUCTION

1.1 EIR TYPE, PURPOSE, AND INTENDED USE

This Draft Project Environmental Impact Report (EIR) was prepared by Rio School District (RSD or the District) to evaluate potential impacts and related mitigation from construction and operation for the RDV Campus Expansion Master Plan (proposed project) to meet the immediate educational, recreational, and support facilities needs of District students. The proposed project includes development within the expanded campus which would include options for: new classrooms, library and media center, multi-purposed building, transportation and parking facilities, recreational facilities including a 320-meter track, flag football field, six basketball courts, baseball field, softball field, physical education (P.E.) and lunch play field, four sand volleyball courts, two soccer fields, jogging path, an athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts. As Lead Agency for the California Environmental Quality Act (CEQA), the District has prepared this Draft EIR in compliance with the State CEQA Guidelines.

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

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

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

1.2 SCOPE OF EIR

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

Initial Study

The District prepared an IS for the proposed project that is included in Appendix A of this EIR. The IS helped focus the EIR on the effects determined to be potentially significant, identified effects determined not to be significant, and provided an explanation for determination of impacts found not to be significant. Based on the environmental

review contained in the IS, RSD determined that implementation of the proposed project may have a significant effect on the environment and that an EIR is required. Topics identified in the IS as potentially significant and requiring additional environmental review in the EIR include the following:

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

Notice of Preparation and Public Scoping Meeting

The District issued a Notice of Preparation (NOP) of an EIR and Notice of Public Scoping Meeting for the RDV Campus Expansion Master Plan on June 7, 2022. The NOP was filed with the Office of Planning and Research (OPR) and the Ventura County Clerk. The NOP and IS were also posted on the District's website and available for public review during normal business hours at the District office. The NOP/IS 30-day public review period was from June 7, 2022 to July 6, 2022.

RSD conducted a public scoping meeting for the proposed project on June 23, 2022. The purpose of the scoping meeting was to receive public comment and input regarding the appropriate scope and content of the EIR. In attendance was Mr. Michael Inda, Field Representative for the County of Ventura Board of Supervisors (Supervisor Kelly Long, Third District). No other individuals from other public agencies or the general public attended. After the formal presentation there was a general discussion of the proposed project.

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

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

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

Name	Agency (if applicable)
Miya Edmonson, LCD/CEQA Branch Chief	California Department of Transportation, District 7
Vyto Adomaitis, Community Development Director	City of Oxnard, Development Services, Planning Division
Alec Thille	County of Ventura Agriculture/Weights & Measures
Shahir Haddad, P.E., Supervising Engineer, Brownsfield Restoration and School Evaluation Branch	Department of Toxic Substances Control
Cody Campagne, Cultural Resources Analyst	Native American Heritage Commission
Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division	Ventura County Air Pollution Control District
James Maxwell, Groundwater Specialist	Ventura County Public Works Agency, Water Resources Division, Groundwater Resources Section
Kai Luoma, Executive Officer	Ventura Local Agency Formation Commission

Known Areas of Controversy

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

Table 1-2. General Areas of Known Controversy

Area of Concern	EIR Section Where Topic is Addressed
Agriculture Mitigation	Section 3.2 Agriculture and Forestry Resources
Water Resources	Section 3.10 Hydrology and Water Quality Section 3.18 Utilities and Service Systems
Wastewater	Section 3.18 Utilities and Service Systems

Issues Found Not To Be Significant

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

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

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

Resource Topic	IS Checklist Topic Found Not to be Significant in IS and Discussed Only in Appendix A of this EIR*	IS Checklist Topic Found Not to be Significant in IS but Included in Detailed EIR Discussion Based on New Information
Aesthetics	<ul style="list-style-type: none"> Adverse effect on a scenic vista Substantially damage scenic resources Conflict with applicable zoning and other regulations governing scenic quality Create a new source of substantial light or glare 	
Agriculture & Forestry Resources	<ul style="list-style-type: none"> Conflict with a Williamson Act Contract or existing agricultural zoning Conflict or cause rezoning of forest or timberland Loss or conversion of forest land Other changes to the environment that could result in conversion of farmland or farmland 	
Air Quality	<ul style="list-style-type: none"> Conflict with or obstruct implementation of applicable air quality plan Expose sensitive receptors to substantial pollutant concentrations 	

Resource Topic	IS Checklist Topic Found Not to be Significant in IS and Discussed Only in Appendix A of this EIR*	IS Checklist Topic Found Not to be Significant in IS but Included in Detailed EIR Discussion Based on New Information
	<ul style="list-style-type: none"> Result in other emissions adversely affecting a substantial number of people 	
Biological Resources	<ul style="list-style-type: none"> Riparian habitat or other sensitive natural community Effects on federally protected wetlands or protected waters of the state Provisions of an adopted habitat conservation plan or natural community conservation 	
Energy	<ul style="list-style-type: none"> Result in potentially significant environmental impact Conflict or obstruct a state or local plan for renewable energy or energy efficiency 	<ul style="list-style-type: none"> Result in potentially significant environmental impact
Geology and Soils	<ul style="list-style-type: none"> Rupture of a known earthquake fault Strong seismic ground shaking Liquefaction Landslides Geologic unit or soil that is unstable Septic tanks 	
Greenhouse Gas Emissions	<ul style="list-style-type: none"> Generate GHG emissions that may have a significant impact on environment Conflict with applicable plan, policy, or regulation adopted 	
Hazards and Hazardous Materials	<ul style="list-style-type: none"> Routine transport, use, or disposal of hazardous materials Reasonably foreseeable upset and accident conditions Safety hazard near airport Implementation of emergency response plan or emergency evacuation plan Wildland fire 	
Hydrology and Water Quality	<ul style="list-style-type: none"> Violate any water quality standards or waste discharge requirements Substantially decrease groundwater supplies or interfere with groundwater recharge Result in substantial erosion or siltation Substantially increase the rate or amount of surface runoff Create runoff which would exceed capacity of stormwater drainage systems 	

Resource Topic	IS Checklist Topic Found Not to be Significant in IS and Discussed Only in Appendix A of this EIR*	IS Checklist Topic Found Not to be Significant in IS but Included in Detailed EIR Discussion Based on New Information
	<ul style="list-style-type: none"> Conflict or obstruct implementation of a water quality control plan or groundwater management plan 	
Land Use Planning	<ul style="list-style-type: none"> Physically divide an established community Cause significant impact due to a conflict with any land use plan, policy, or regulation adopted 	
Mineral Resources	<ul style="list-style-type: none"> Loss of known mineral resource of value to region or state Loss of locally important mineral resource recovery site 	<ul style="list-style-type: none"> Loss of known mineral resource of value to region or state Loss of locally important mineral resource recovery site
Noise	<ul style="list-style-type: none"> Generation of substantial temporary or permanent increase in ambient noise levels Generation of excessive groundborne vibration or noise levels Excessive noise levels in the vicinity of a private airstrip or public airport 	
Population and Housing	<ul style="list-style-type: none"> Induce unplanned population growth into the area Displace substantial number of people or housing units requiring replacement housing 	<ul style="list-style-type: none"> Induce unplanned population growth into the area
Public Services	<ul style="list-style-type: none"> Adverse impacts on fire protection Adverse impacts on police protection Adverse impacts on schools Adverse impacts on parks Adverse impacts on other public facilities 	
Recreation	<ul style="list-style-type: none"> Increased use of existing parks Include recreational facilities that might have an adverse effect on environment 	
Transportation	<ul style="list-style-type: none"> Substantially increase hazards due to a geometric design feature Result in inadequate emergency access 	
Utilities and Service Systems	<ul style="list-style-type: none"> Require or result in relocation of new or expanded utility systems or facilities Have sufficient water supplies available Adequate wastewater treatment capacity Generation of solid waste in excess of state or local standards, local infrastructure capacity or in conflict with waste reduction goals 	

Resource Topic	IS Checklist Topic Found Not to be Significant in IS and Discussed Only in Appendix A of this EIR*	IS Checklist Topic Found Not to be Significant in IS but Included in Detailed EIR Discussion Based on New Information
	<ul style="list-style-type: none"> • Comply with statutes and regulations related to solid waste 	
Wildfires	<ul style="list-style-type: none"> • Impair an adopted emergency response plan or emergency evacuation plan • Exposure of project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire • Require infrastructure that could exacerbate fire risk or result in impacts on the environment • Expose people or structures to significant risks 	

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

1.3 EIR ORGANIZATION

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

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

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

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

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

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

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

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

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

Appendices. Includes supporting data for contents of this EIR.

1.4 PUBLIC REVIEW OF DRAFT EIR

This Draft EIR is available for public review and comment during a 45-day public review period beginning on October 7, 2022 and ending on November 21, 2022 at 5:00 p.m. The Draft EIR is available for public review at:

- RSD District Office at 1800 Solar Drive, Oxnard, California 93030 during normal business hours.
- RSD's website at: <https://www.rioschools.org/>.
- City of Oxnard Downtown Main Library at 251 South A Street, Oxnard, California 93030.

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

Mr. Wael Saleh, C.P.A., M.B.A., Assistant Superintendent of Business Services
Rio School District
1800 Solar Drive
Oxnard, California 93030

Public Meeting

RSD will conduct a public meeting for the proposed project. The purpose of the public meeting is to solicit and receive public comment regarding the Draft EIR. The public meeting for the Draft EIR is scheduled for November 3, 2022, at 6:30 p.m. at the District Office Board Room, 1800 Solar Drive, Oxnard, CA 93030.

2.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

Project Title:	Rio del Valle Middle School Existing Campus Expansion Master Plan
Lead Agency Name and Address:	Rio School District 1800 Solar Drive Oxnard, CA 93030
Contact Person and Phone Number:	Joel Kirschenstein, SRGI (805) 377-3999 Wael Saleh, C.P.A., M.B.A., Assistant Superintendent/Chief Business Official (805) 485-6302, Ext. 2130
Project Location:	Northeast of Rose Avenue and Collins Street
Assessor Parcel Number (APN):	APNs 144-0-110-445, 144-0-110-225, and 144-0-110-590
Project Sponsor's Name and Address:	Rio School District 1800 Solar Drive Oxnard, CA 93030
City of Oxnard General Plan Designation:	Agriculture and School
Ventura County General Plan Designation	Agriculture and Very Low Density Residential
El Rio / del Norte Area Plan Designation (embedded as part of General Plan)	Agriculture (40 AC Min.) and Institutional (10 AC Min.)
Ventura County Zoning Designation:	RE-20,000 S.F. AE-40 ac/MRP AE-40 ac/MRP
Surrounding Land Uses:	North: Residential and agricultural land East: Agricultural land South: Commercial (car dealerships) West: Residential
Planned and Pending Projects in the Site Vicinity (City of Oxnard 2022a):	Rio Urbana Maulhardt/Stiles NECSP Sub-Neighborhood Plan Riverpark

2.1 RIO SCHOOL DISTRICT

Rio School District (RSD or the District) serves the unincorporated community of El Rio, the Riverpark development, and portions of the City of Oxnard. The District strives to provide world-class education to its students through five elementary schools, two K-8 school academies, and two middle schools. Since its beginnings as a one-room schoolhouse in 1885, RSD has been the center of the community for all of the families it has served. Today, the

RSD continues its tradition of caring for each student. Through teaching excellence, close working relationships, and community business and government partnerships, RSD inspires students and employees to strive to be lifelong learners who are engaged in the community (RSD 2021). Table 2-1 shows a list of the nine RSD schools and their existing enrollment.

Table 2-1. Rio School District Schools

School	Existing Enrollment*
<i>Elementary</i>	
Rio del Mar	403
Rio del Norte	472
Rio Lindo	486
Rio Plaza	556
Rio Rosales	500
<i>K-8</i>	
Rio Real	682
Rio del Sol	703
<i>Middle Schools</i>	
Rio del Valle	819
Rio Vista	696
Total	5,317

*2019-20 Existing Enrollment Data from the California Department of Education (CDE 2021).

2.2 PROJECT LOCATION

The proposed project includes the expansion of the Rio del Valle Middle School (RDV) campus and related programs located at 3100 Rose Avenue in unincorporated County of Ventura (Figure 2-1). The primary access to the main campus is off Rose Avenue. The existing campus is approximately 30.2 acres, including the 20.2-acre main campus (APN 144-0-110-445) and 10 acres of active agricultural lands (a portion of APN 144-0-110-225) to the north of the main campus buildings. The proposed project would add approximately 11.1-acres to the south (a portion of APN 144-0-110-590) that the RSD proposes to develop with new educational and support facilities, resulting in an approximately enhanced 41.3-acre campus (project Site). The RSD is currently in escrow to acquire the southern campus expansion area. All three parcels (southern campus expansion area, northern campus expansion area and main campus) associated with the proposed project are proposed for annexation into the City of Oxnard. The geographic coordinates of the project Site are approximately Latitude 34° 14' 2.39" North, Longitude 119° 9' 10.61" West (Google Earth Pro 2021). Surface elevations at the project Site are approximately 92 feet above mean sea level (EDR 2021). The project Site is generally surrounded by agricultural lands and residential uses to the north, agricultural lands to the east, commercial uses (car dealerships) to the south, and residential uses to the west, as shown in Figure 2-2. The land use designations for the project Site are identified in Table 2-2.

Table 2-2. Project Site Land Use Designations

Parcel	Ventura County General Plan Land Use Designation	Ventura County Zoning Designation	County SOAR	Oxnard-Camarillo Greenbelt	City of Oxnard General Plan Land Use Designation
Agricultural Learning Program/Northern Campus Expansion Area 144-0-110-225 (Portion)	Agricultural	AE-40 ac/MRP	Yes	Yes	Agriculture
Main Campus 144-0-110-445	Very Low Density Residential	RE-20,000 S.F.	No	No	School
Southern Campus Expansion Area 144-0-110-590 (Portion)	Agricultural	AE-40 ac/MRP	Yes	Yes	Agriculture

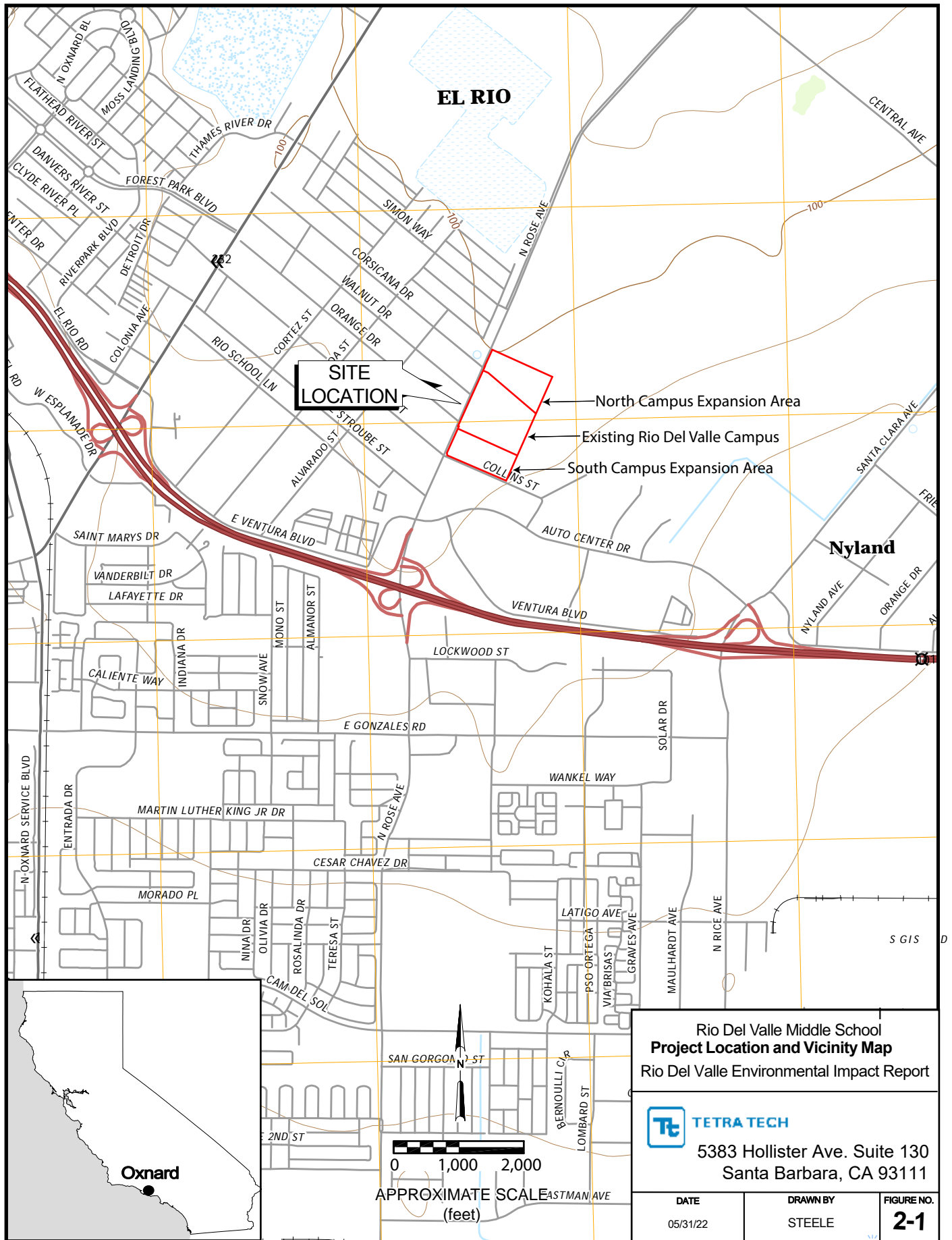
As of January 2022, planned and pending projects in the Site vicinity include Rio Urbana, the Maulhardt/Stiles Northeast Community Specific Plan (NECSP) Sub-Neighborhood Plan, various projects falling under the greater Riverpark development, and multiple commercial and industrial projects. The City of Oxnard currently states 290 planned and pending projects; a vast majority of these occur outside of the RDV attendance boundary. The Riverpark development, Rio Urbana, and the Maulhardt/Stiles NECSP Sub-Neighborhood Plan are the three pending projects that could directly affect the project proposed herein. The projects have the potential to bring in additional student population to the City through new residential units. While the commercial and industrial projects in the Site vicinity may add available jobs and consumer appeal to the area, these projects will not directly add permanent population and housing that would affect RSD and its student body (City of Oxnard 2022a, RSD 2021). District-wide individual school boundary adjustments will be made as needed in the future, and the proposed project will improve the RSD's ability to accommodate an increased student body.

2.3 PROJECT OBJECTIVES

The objectives of the proposed project include the following:

- Address significant community health, safety, and welfare issues including congested traffic and parking conditions;
- Streamline RSD student transportation to improve safety and reduce vehicle miles traveled (VMT) and mitigate existing on-Site and off-Site parking impacts;
- Accommodate existing and projected future student enrollment within the RSD;
- Locate school facilities within close proximity to students' residences;
- Provide new facilities that meet the RSD's educational program specifications;
- Consolidated facilities that reflect the need and efficient use of limited land resources; and
- Ensure cost-effective use of State and local public resources funding sources.

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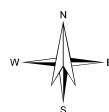
Base Map: Oxnard, CA Quadrangle 7.5 Minutes Series, U. S. Geological Survey 2018

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Legend

- Project Boundary
- Existing Mature Oak Trees



0 200 400 800 Feet

Data Sources: ESRI, Ventura County, Tetra Tech
Background: ESRI World Imagery Service

Rio Del Valle Middle School

**Current and Surrounding Land Uses,
Ventura County, California**
Rio Del Valle Environmental Impact Report



5383 Hollister Ave. Suite 130
Santa Barbara, CA 93111

DATE
05/31/2022

DRAWN BY
BURSON/
STEELE

MAP NO.
10911

FIGURE
2-2

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2.4 PROJECT DESCRIPTION

RSD proposes to implement the RDV Campus Expansion Master Plan (proposed project) to meet the immediate educational, recreational, student safety, parking, interior traffic circulation, and support facilities needs of District students. Enrollment within the RSD has been increasing and additional facilities are needed now to accommodate the students.

The RSD is currently in escrow to acquire approximately 11.1 acres to the south of the existing campus that would extend the existing RDV campus boundary to Collins Street. This land acquisition would increase the RDV campus area to approximately 41.3 acres. The proposed project includes development within the expanded campus which would occur in two phases, as detailed below, and would include options for: new classrooms, library and media center, multi-purposed building, transportation and parking facilities, recreational facilities including a 320-meter track, flag football field, six basketball courts, baseball field, softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, jogging path, an athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts. Figure 2-3 shows the Conceptual Site Master Plan. This plan was revised in March 2022 to protect the existing stand of mature oak trees present in the eastern portion of the existing RDV main campus.

The expanded campus shall provide significant health and safety improvements, additional on-Site parking, and a bus turnout lane. Six of the District's 17 buses are used for RDV student transportation during and after school programs; these buses would be housed on the southern 11.1-acre addition to the campus with the buildout of the proposed project.

On June 30, 2022, RSD buses were moved from the existing District Transportation and Parking Facility (DTPF) on Vineyard Avenue (former El Rio Elementary School) to a temporary parking facility located at Oxnard School District Transportation Center (near 516 W. Wooley Road). This temporary bus parking location will be utilized until bus parking facilities included as part of the proposed project at RDV become available. The temporary parking facility located at Oxnard School District Transportation Center is not considered part of the proposed project, and therefore is not analyzed for significant environmental impacts in this EIR. RSD would have lost access to the current DTPF on Vineyard Avenue in June 2022, regardless of the proposed project.

The existing RDV main campus includes the RDV Gymnasium (GYM) which is located adjacent to the proposed southern campus expansion area. It should be noted that the GYM is shared with the John F. Flynn Community Clinic and the Sheriff's Department as set forth and described in a Joint Use Agreement. However, the existing parking along with ingress and egress at the middle school has always been inadequate and therefore the RSD is proposing to assign overflow parking on the proposed new adjacent parking area (Parking Lot A) when school is not in session.

The buildout of the RDV Campus Master Plan is anticipated to occur over approximately five years. A comparison of existing and proposed RDV campus configuration is provided in Table 2-3.

Table 2-3. Comparison of Existing and Proposed Rio del Valle Configuration

	Existing Configuration	Proposed Configuration
Student Capacity	~1,116	~1,366
District Staffing	70	95
Total Classrooms	39	49
Permanent Square Footage	81,024	115,482
Portable Square Footage	7,071	11,535
Total Building Square Footage	88,095	127,017
Parking Spaces	90 (84 standard and 6 accessible)	379 (339 standard, 16 accessible, and 24 bus)
Total Campus Area (Acres)	30.2	41.3

Existing Campus Recreational Renovations

The RSD, in order to accommodate the increasing student enrollment and associated demand on recreational fields, has processed field renovation plans and an associated parking facility replacement through the California Department of General Services, Division of the State Architect (DSA) on the existing main campus. These renovations are in progress and are slated for completion in fall 2022. As these renovations involve the repair, maintenance, and minor alteration of existing facilities; replacement or reconstruction of existing facilities; and the construction of small new and/or accessory structures, approved before this proposed project was under consideration, the RSD proceeded under a CEQA exemption for these renovations. Due to the scope of these renovations, the RSD has included these existing campus renovations with the proposed project to provide a full and complete review of cumulative impacts. These renovations are all on the existing main campus only and are illustrated on Figure 2-3.

The renovated facilities completed in fall 2022 will consist of a 320-meter track, flag football field, two soccer fields, and four interim basketball courts. After completion of these renovations, additional recreational renovations will be undertaken on the existing campus during Phase I, including a baseball field, softball field, an athletic restroom/storage building, and up to 10 new tennis and or pickleball courts. The RSD intends to make these renovated fields open to community use outside of school hours.

To facilitate these existing campus renovations, the existing parking lot located at the northeastern corner of the existing main campus parcel will be relocated to the northwestern corner of the existing campus, with direct access to Rose Avenue. This relocated parking facility, shown as 'Parking Lot B' on Figure 2-3, consists of 95 spaces (91 standard stalls and 4 accessible stalls). Parking Lot B has received necessary approvals from DSA and is currently under construction.

Phase I

The RSD proposes to annex all three parcels (southern campus expansion area, northern campus expansion area, and main campus) into the City of Oxnard during Phase I. Phase I activities for the proposed project will include improvements on the western portion of the southern campus expansion area shown on Figure 2-3. Per the City of Oxnard Municipal Code, Chapter 21, Article III, utility undergrounding associated with the proposed project will likely be necessary, and utility undergrounding along public rights-of-way (ROWs) will likely occur as part of Phase I. Construction will start for most of the following improvements after approval of the EIR, anticipated in December 2022. These construction activities are estimated to take 18 months. Phase I activities will also include replacement and relocation of some of the existing recreational facilities and parking within the existing main campus. To assist in alleviating parking and overcrowding issues, some of the playfields and Parking Lot B in the main campus were completed in June 2022.

The southern campus expansion area is approximately 11.1 acres in size and is located on a portion of current APN 144-0-110-590. RDV is currently in escrow to acquire the southern campus expansion area, which would extend the existing boundary of the RDV campus south to Collins Street. The current western and eastern property lines would continue southward on their current bearings, until terminating at Collins Street. Access to the project Site is proposed via driveway connections to Collins Street, from the campus Parking Lot A, and the proposed Parking Lot B off Rose Avenue. A 25-foot-wide access road will run from south to north providing a secondary point of access through the existing RDV parking area. The DTPF will consist of a 7,500 sq. ft. maintenance building, two 1,080 sq. ft. portable buildings, 528 sq. ft. restroom, and conversion of the approximately 3,130 sq. ft. existing residential structure located on the project Site to office use by RSD Maintenance and Operations staff. The DTPF including buses, can be completely closed off from the general public or staff parking areas, allowing for enhanced security and operational options. Existing utility lines are present within the southern campus expansion area. A detailed map showing current land use of the southern campus expansion area is shown in Figure 2-4.

Upon completion of the permanent DTPF, bus and district vehicle parking will be relocated from the temporary parking facility located at Oxnard School District Transportation Center (near 516 W. Wooley Road) to this new,

permanent area as shown on Figure 2-3. Parking Lot A will provide 214 standard and 10 accessible parking spaces for the RDV campus.

Utility Improvements – Electrical & Lighting

Utility undergrounding associated with the proposed project will likely be necessary, and utility undergrounding along public ROW will likely occur as part of Phase I; therefore, utility improvements associated with electrical and lighting are discussed in the Phase I text herein. Water and sewer related utility improvements associated with the proposed project is proposed for construction during Phase II and are discussed below.

Southern California Edison (SCE) currently provides electrical service to RDV. SCE will provide electrical service to the proposed southern campus expansion area via new electrical secondary connection(s) and meter(s). SCE has existing 17 kilovolt (KV) overhead primary power lines located in the Rose Avenue ROW, on the eastern side of Rose Avenue along the western Site boundary. Electrical power is supplied to the southern campus expansion area from the overhead primary power lines located in the Rose Avenue ROW by a run of overhead secondary power lines routed approximately 600 feet east from Rose Avenue and approximately 55 feet south of the north boundary of the southern campus expansion area. Electrical power is also routed from this run of overhead secondary power lines to a pole on the southern boundary of the existing main campus adjacent to the GYM building. There are two pole-mounted electrical transformers located along the run of overhead secondary power lines in the southern campus expansion area approximately 520 feet and 600 feet east of Rose Avenue. Another pole-mounted electrical transformer is located along the overhead primary power lines located in the Rose Avenue immediately adjacent to the western boundary of the southern campus expansion area approximately 280 feet south of the north boundary of the southern campus expansion area. While the southern campus expansion area is currently serviced by SCE with the existing secondary power lines, it is anticipated that service will be further extended from the existing SCE primary infrastructure, which is located on the same side of the street as RDV, to service the southern campus expansion area.

Additional Existing Campus Recreational Renovations

The RSD will undertake additional recreational renovations on the existing main campus during Phase I, including a baseball field, softball field, an athletic restroom/storage building, and up to 10 new tennis and/or pickleball courts. Opportunities for use of the recreational school facilities by the community outside of school hours is planned. See Figure 2-3 for these additional recreational renovations.

Phase II

Phase II activities for the proposed project will include improvements to the remaining eastern portion of the southern campus expansion area and the northern campus expansion area. Construction will start on the following Phase II improvements in two to five years (2024–2027). These construction activities are estimated to take 18 to 24 months.

Agricultural Learning Program (Northern Campus Expansion Area)

No land use changes to the northern campus expansion area are currently proposed as part of the proposed project. Approximately 10 acres on the northern portion of the project Site is currently utilized for agriculture and RSD plans to utilize the Site as an outdoor working farm “classroom.” This working farm “classroom” is intended to partner with other school districts, provide produce for school food services, and market the surplus produce. No utility expansion is proposed in this expansion area. An outdoor lecture area and a small, paved pathway are planned for this area. Possible fencing may be added for security. A Notice of Exemption (NOE) for the purchase and use of the northern campus expansion area for an agricultural learning program was filed and posted with the Ventura County Clerk on August 11, 2021; no challenges to the NOE were filed.

Classroom and Library/Media Center and Multi-Purpose Buildings

The proposed project includes the potential for construction of up to 12,000 sq. ft. for eight new classrooms and approximately 4,000 sq. ft. library/media center and 5,400 sq. ft. multi-purpose buildings. These improvements could accommodate a potential 250-student increase, expected to occur over a five-year period commencing at the earliest in the 2024/2025 school year. All these improvements are shown in Figure 2-3.

Recreational Facilities

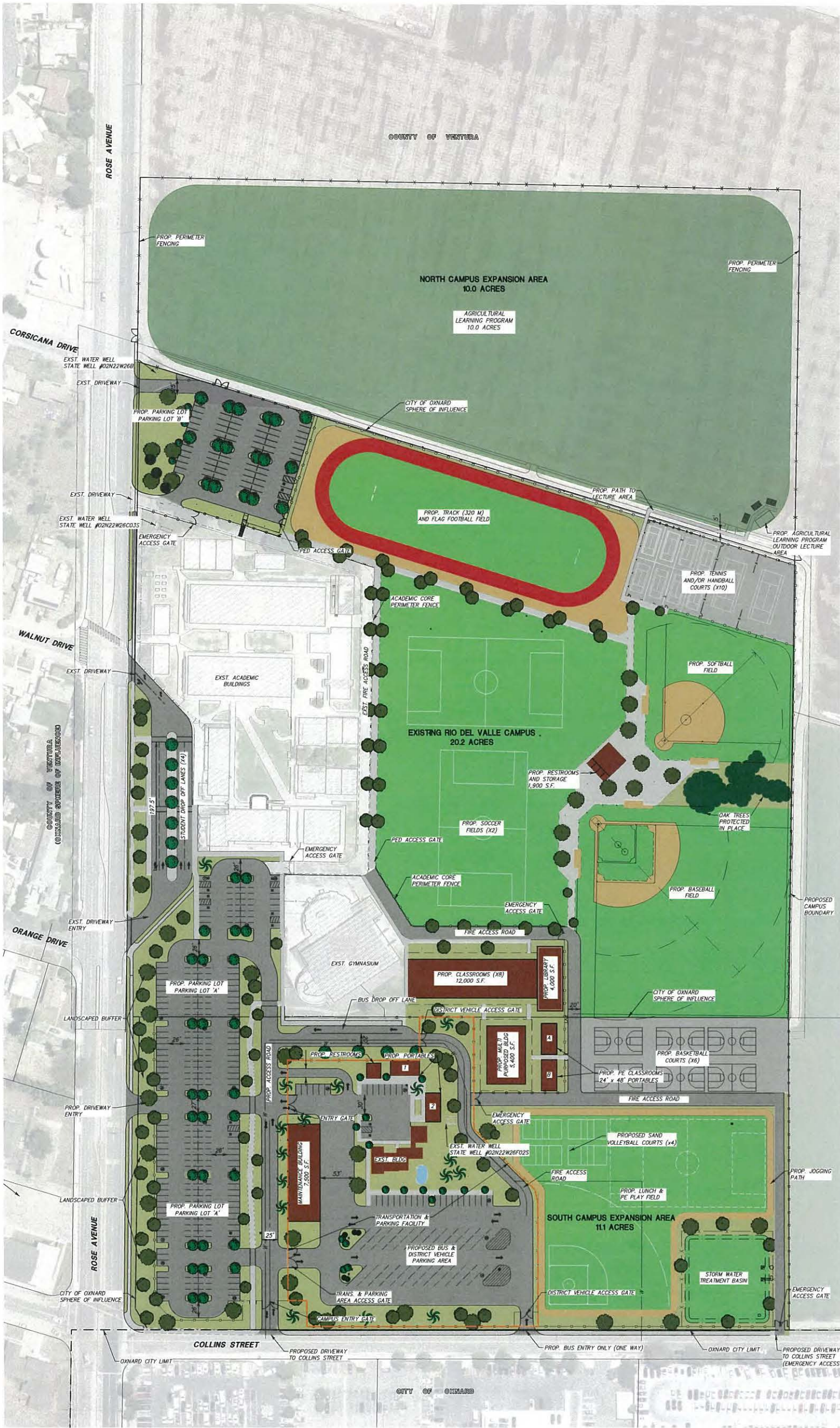
New school and community recreational facilities would be added including a P.E. and lunch play field, four sand volleyball courts, and a jogging path. The proposed project also includes two 1,080 sq. ft. portable classrooms for physical education. Opportunities for use of the recreational school facilities by the community outside of school hours is planned. See Figure 2-3 for the proposed on-Site improvements.

Utility Improvements – Water

RDV currently obtains water through three existing unique sources: The City of Oxnard, a RSD-owned and operated well, and the United Water Conservation District (UWCD). Based on future direction from prospective water purveyors, as well as RSD's consultant's professional judgement, the proposed project's southern campus expansion area will obtain potable water from a new connection to the City of Oxnard water system. The anticipated point of connection would be from an existing City water line(s) located in the Rose Avenue or Collins Street ROW. An approximately 8-inch diameter water line would deliver water from the City line to the proposed southern campus expansion area. It is anticipated that the improvements proposed on the existing campus parcel will utilize connections from existing service lines. At this time, it is anticipated that the northern campus expansion area will continue to utilize agricultural water from current sources (well water).

Utility Improvements – Sewer

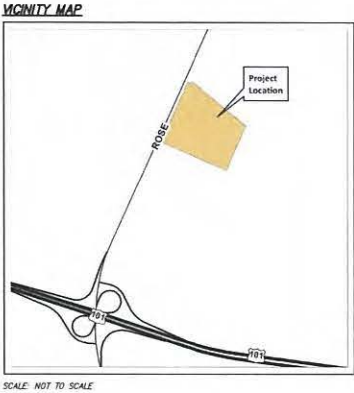
The City of Oxnard provides existing sewer service to RDV through an extension of the sewer main in Rose Avenue to the RDV Site. Sewer service is proposed to be provided to the southern campus expansion area via a new connection to the City of Oxnard sewer main, separate from the existing main campus sewer. The anticipated point of connection would be on Rose Avenue or Collins Street ROW. Sewer service for new improvements on the existing main campus will be via connecting to the existing RDV sewer Point of Connection (assuming adequate capacity).



LAND USE DATA	
OVERALL CAMPUS EXPANSION SUMMARY	
EXISTING RIO DEL VALLE MIDDLE SCHOOL SITE	20.2 ACRES
NORTH CAMPUS EXPANSION AREA	10.0 ACRES
SOUTH CAMPUS EXPANSION AREA	11.1 ACRES
TOTAL AREA	41.3 ACRES
PROPOSED BUILDINGS/STRUCTURES	
ACADEMIC & INSTRUCTIONAL BUILDINGS	
CLASSROOMS (x8)	12,000 S.F.
LIBRARY & MEDIA CENTER	4,000 S.F.
MULTI-PURPOSE BUILDING	5,400 S.F.
PHYSICAL EDUCATION CLASS 'A'	1,152 S.F.
PHYSICAL EDUCATION CLASS 'B'	1,152 S.F.
MAINTENANCE & OPERATIONS BUILDINGS	
MAINTENANCE BUILDING	7,500 S.F.
EXISTING BUILDING	43,130 S.F.
PORTABLE #1	1,080 S.F.
PORTABLE #2	1,080 S.F.
RESTROOMS	528 S.F.
ATHLETIC BUILDINGS	
RESTROOMS/STORAGE BUILDING	1,900 S.F.
TOTAL BUILDING AREA PROPOSED:	37,192 S.F.
EXISTING/RE-PURPOSED STRUCTURES	43,130 S.F.
GRAND TOTAL:	38,922 S.F.
PROPOSED FIELDS/ATHLETIC FACILITIES	
320 METER TRACK	
FLAG FOOTBALL FIELD	
BASEBALL FIELDS (x2)	
SOFTBALL FIELD	
P.E. & LUNCH PLAY FIELD	
SAND VOLLEYBALL COURTS (x4)	
OUTDOOR BASKETBALL COURTS (x6)	
TENNIS COURTS AND/OR HANDBALL COURTS (x10)	
SOCCER FIELDS (x2 to 3)	
400 METER JOGGING PATH	
NOTE: IRRIGATION & FARMWORKER PATHS CURRENTLY IN OPERATION	

PARKING DATA	
PARKING LOT 'A'	
STANDARD PARKING SPACES	214 SPACES
ACCESSIBLE PARKING SPACES	10 SPACES
PARKING LOT 'B'	
STANDARD PARKING SPACES	91 SPACES
ACCESSIBLE PARKING SPACES	4 SPACES
TRANSPORTATION & PARKING FACILITY	
STANDARD PARKING SPACES	34 SPACES
BUS PARKING SPACES	24 SPACES
ACCESSIBLE PARKING SPACES	2 SPACES
PARKING SUMMARY	
STANDARD PARKING SPACES	339 SPACES
BUS PARKING SPACES	24 SPACES
ACCESSIBLE PARKING SPACES	16 SPACES

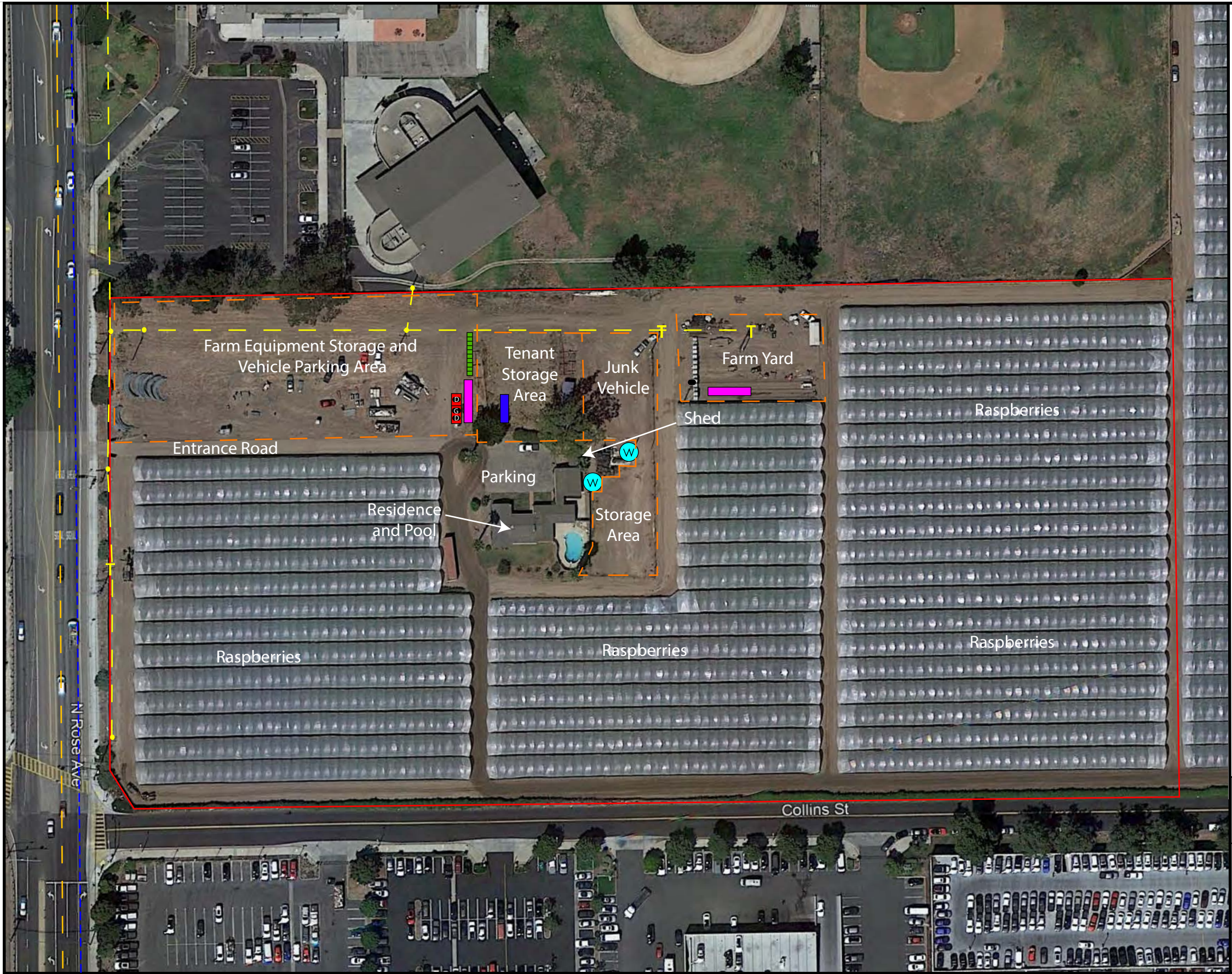
LEGEND	
	CITY OF OXNARD CITY LIMITS
	CITY OF OXNARD SPHERE OF INFLUENCE
	TRANSPORTATION & PARKING AREA
	FUTURE INSTRUCTIONAL/ATHLETIC EXPANSION AREA
	AGRICULTURAL LEARNING PROGRAM AREA



REVISION	DATE	CLIENT
NORTH AREA REVS	06-21	
DESIGN DETAILS	08-21	
RE-DESIGN	03-22	
PRE-APP SUB	07-22	
RE-DESIGN	09-22	
ENGINEER & LAND USE PLANNER:		
1672 DONLON STREET VENTURA, CALIF. 93003 PHONE: 805/654-6977 FAX: 805/654-6979		

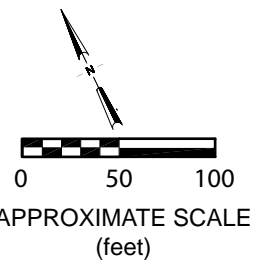
Rio Del Valle Middle School Conceptual Master Plan Rio Del Valle Environmental Impact Report				
5383 Hollister Ave., Suite 130 Santa Barbara, CA 93111				
TC NO	DATE	DRAWN BY	MAP NO	FIGURE
41561	10/03/22	STEELE		2-3

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LEGEND

- Site Boundary
- Pole-Mounted Electrical Power Lines
- Pole-Mounted Electrical Transformer
- KMS Industries, Inc. Water Well
- Reiter Brothers Storage Container
- Tenant Storage Container
- Above Ground Fuel Storage Tanks (G = Gasoline, D = Diesel)
- Reiter Brothers Agricultural Amendment Totes
- 16-inch OD Steel Water Pipeline (City of Oxnard)
- 42-inch OD Steel Water Pipeline (United Water Conservation District)



Rio Del Valle Middle School
Southern Parcel Current Land Use,
Rio Del Valle Environmental Impact Report



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DATE	DRAWN BY	FIGURE
05/31/22	STEELE	2- 4

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Table 2-4 shows a Conceptual Site Plan Summary for the proposed project.

Table 2-4. Conceptual Site Plan Summary

Building	Building Area ft ²	Notes
Classrooms (8)	12,000	Two-Story
Library & Media Center	4,000	One-Story
Multi-Purpose Building	5,400	One-Story
Physical Education Class 'A'	1,152	One-Story
Physical Education Class 'B'	1,152	One-Story
Maintenance Building	7,500	One-Story
Existing Residence	3,130	Two-Story
Portable #1	1,080	One-Story
Portable #2	1,080	One-Story
M&O Restrooms	528	One-Story
Athletic Restrooms/Storage Building	1,900	One-Story
Total	38,992	
Parking Lot	Standard Spaces	Accessible Spaces
A	214	10
B	91	4
District Transportation and Parking Facility (DTPF)	34/24 (Bus)	2
Total	339/24 (Bus)	16
Recreational Facility		Ground Surface
320-Meter Track		Paved
Flag Football Field		Turf
Baseball Field		Turf
Softball Field		Turf
P.E. and Lunch Play Field		Turf
Soccer Fields (2)		Turf
Sand Volleyball Courts (4)		Sand
Outdoor Basketball Courts (6)		Paved
Tennis Courts and/or Pickleball Courts (10)		Paved
400-Meter Jogging Track		Paved

Notes: ft² square foot. All square footage estimates are approximate

2.5 REQUIRED PERMITS AND APPROVALS

The EIR will be used by RSD and responsible and trustee agencies with jurisdiction over portions of the project prior to deciding whether to approve or permit project components. A public agency, other than the lead agency, which has discretionary approval power over a project is known as a “responsible agency” as defined by CEQA Guidelines Section 15381. Anticipated permits and approvals for the proposed project are identified in Table 2-5.

Table 2-5. Anticipated Permits and Approvals

Agency	Permit/Approval
California Department of Education (CDE)	Approval of construction plans and Expanded Site Plan
California Department of General Services, Division of the State Architect (DSA)	Approval of construction plans and Expanded Site Plan
California Department of Toxic Substances Control (DTSC)	Approval of Preliminary Environmental Assessment (PEA) and Supplemental Site Investigation (SSI) for Southern Campus Expansion Area
Calleguas Municipal Water District (CMWD)	Annexation Request
City of Camarillo	Oxnard-Camarillo Greenbelt Modification
City of Oxnard	Annexation Request, General Plan Amendment/Pre-Zoning*, and Oxnard-Camarillo Greenbelt Modification
Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB)	Storm Water Pollution Prevention Plan
Rio School District (RSD)	Approval of Project (Educational Specifications, Design/Construction Funding and Associated Contract Approvals), Adoption and Approval of EIR and MMRP
County of Ventura	Oxnard-Camarillo Greenbelt Modification
Ventura Local Agency Formation Commission (LAFCo)	City of Oxnard Annexation, CMWD Annexation, associated Sphere of Influence (SOI) and City Urban Growth Boundary (CURB) adjustments

*The RSD may, to the extent applicable, elect to exercise its authority pursuant to Government Code Section 53094 to overrule zoning.

Permitting Pathway

Based upon feedback obtained from public agency stakeholders and the RSD’s consultants’ professional judgement, the following permitting pathway has been identified as the most appropriate for the proposed project.

The RSD will serve as lead agency for purposes of CEQA. CEQA Guidelines Section 15367 defines the lead agency as the public agency that has the primary responsibility for carrying out and or approving a project. All other public agencies will serve as responsible or trustee agencies, as defined by CEQA Guidelines. A public agency, other than the lead agency, which has discretionary approval power over a project is known as a responsible agency, as defined by CEQA guidelines Section 15381. As such, the RSD prepared the Initial Study and the EIR.

The RSD is requesting annexation of all three parcels (southern campus expansion area, northern campus expansion area, and existing main campus) into the City of Oxnard. Pursuant to CMWD policy, any areas annexed

into the City of Oxnard would also be annexed into CMWD, as CMWD is the wholesale water supplier to the City of Oxnard.

The northern campus expansion area is planned to be annexed, if deemed appropriate by the RSD, City of Oxnard, County of Ventura, and LAFCo. The water source for the northern campus expansion area will factor considerably into this decision, as obtaining water service to this parcel from the City of Oxnard would warrant annexation. The RSD believes that there are several pertinent reasons to consider annexation of the northern campus expansion area, in addition to the southern campus expansion area. These are summarized below:

- Creation of one comprehensive campus within the same jurisdictional boundaries. When possible, this is preferred by the DSA and CDE. Additionally, support components such as parking, security fencing, and campus check-in will be shared among all three campus areas (southern campus expansion, existing main, and northern campus expansion).
- Administration, including funding and campus management, will be simplified by the entire RDV campus being located within the same jurisdictional boundaries.
- Annexation of the northern campus expansion area may result in better consistency with LAFCo policies. Specifically, Ventura LAFCo Commissioner's Handbook Section 3.2.2, General Boundary criteria, which states: "LAFCo favors applications with boundaries that do the following: a) Create logical boundaries that coincide with existing and planned service areas and, where possible, eliminate previously existing islands, b) Follow natural and man-made features, such as ridge lines drainage areas, watercourses, and edges of ROW, provided they coincide with lines of assessment or ownership, or are described by metes and bounds legal descriptions which can easily be used for mapping lines of assessment or ownership." Ventura LAFCo Commissioner's Handbook Section 3.2.2 also specifically discourages boundaries that would "split neighborhoods or divide an area with a social or economic identity." It can be argued that dividing the proposed RDV campus could result in such a split.
 - Further, the RSD notes that while the use of the northern campus expansion area will be agricultural in nature, the primary intention is not commercial agriculture, but instead agricultural instruction and education as part of the broader RDV campus.

In addition to the annexation request, concurrent entitlements from the City of Oxnard may include a General Plan Amendment and Zoning/Pre-Zoning Requests. It is anticipated that the project Site will obtain a General Plan designation of School (SCH) and a zoning designation of Community Reserve (C-R). Upon annexation, subsequent entitlements and use permits may be subject to Government Code Section 53094 which allows the RSD, to the extent applicable, to elect to exercise its authority to overrule local zoning regulations.

The annexation request would be subject to final review and approval by LAFCo in the form of a *reorganization* request. In addition to the request for annexation into the City of Oxnard, the reorganization request would also include annexation into CMWD, SOI Amendments, and a City of Oxnard CURB adjustment. In order for the reorganization request to be approved, LAFCo must consider and weigh the applicable criteria established in Division 3, Chapter 3 of the LAFCo Commissioner's Handbook.

Additionally, it is worth noting that school facilities are exempt from a vote of the people as required by the City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinance. Specifically, Section 3, Subsection 6 (Exemptions) states:

"The provisions of this ordinance otherwise requiring a vote of the people do not apply to nor affect the authority and discretion of the City Council with respect to any roadways designated in Chapter 4, Infrastructure and Services of the 2030 Oxnard General Plan as of adoption and subsequent amendments, construction of public potable water facilities, public schools, public parks or other government facilities, or

any development project that has obtained as of the effective date of this initiative a vested right pursuant to state or local law.”

However, an annexation to the City of Oxnard would trigger an amendment to the Oxnard-Camarillo Greenbelt Agreement, as approved by City of Oxnard Resolution No. 8616, Board of Supervisors Resolution No. 222, and City of Camarillo Resolution No. 84-9 in February 1984. Specifically, the resolution reads as follows:

“Now, Therefore, Be It Resolved, that the Camarillo City Council, the Oxnard City Council, and the Ventura County Board of Supervisors hereby establish this greenbelt for and agree to a policy of non-annexation, non-development, and retention of open space uses...”

As the proposed southern campus expansion area (non-agricultural campus expansion) and the northern campus expansion area lies within the greenbelt agreement area, this agreement would have to be amended, and subsequently approved by the City of Oxnard, City of Camarillo, and County of Ventura.

2.6 CUMULATIVE PROJECT LIST

According to CEQA Guidelines Section 15130 (b) the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. Table 2-6 shows a list of past, present, and probable future City of Oxnard and Ventura County projects used in the EIR cumulative analysis.

Table 2-6. Cumulative Project List

Project	Location	Description
Enterprise Auto Rental Office (Commercial 19-500-01)	Northwest Rose Avenue and Ventura Boulevard Oxnard, CA	New auto rental office (1600 square feet [SF]), auto car wash, and lot for 40 rental vehicles
Verizon Wireless Communications Facility (Commercial 18-530-02)	1630 E. Ventura Boulevard, Oxnard, CA	Construction of a wireless communications facility (540 SF) designed as a 40-foot faux eucalyptus tree
New In-N-Out Burger Restaurant (Commercial 21-500-04)	1700 E. Ventura Boulevard, Oxnard, CA	Demolish an existing 18,000 SF commercial structure and construct a new 3,885 SF drive-thru restaurant with 23 car stacking lane and 74 parking spaces
New Starbucks Coffee (Commercial 21-500-03)	1720 E. Ventura Boulevard, Oxnard, CA	Demolish an existing 7,080 SF commercial structure and construct a new 1,800 SF drive-thru Starbucks Coffee with 15 car stacking lane and 27 parking spaces
Assembly Use (Institutional PL-15-0195)	250 E. Collins Street Oxnard, CA	Conditional Use Permit (CUP) for existing Assembly Use
Oil and Gas Production Facility (Industrial PL18-0105)	Unknown	CUP for continued operation of facility for 20-year term
Greenhouse Structures, Office and Packing Building, Maintenance Building, Refrigerated Storage and	Northwest Corner of Gonzales Road and Victoria Avenue	Major CUP modification to split entitlement into two individual CUPs

Project	Location	Description
Boiler Building, and Farmworker Dwelling (Commercial PL14-0049)		
Existing Greenhouse Structures (Commercial LU11-0148)	4107 Gonzales Road Ventura County, CA	Major CUP modification for continued operation for an additional 20 years
New Commercial Organics Processing Operation (Commercial PL17-0154)	13290 W. Telegraph Road, Ventura County, CA	CUP for new operations
Lot Line Adjustment (Commercial PL20-0030)	366/372 Avocado Place, Camarillo, CA	Correct lot configuration
Land Conservation Act (LCA) (Commercial PL20-0066)	Central Avenue and Beardsley Road, Oxnard, CA	New 10-year LCA contract for a 131.70-acre property
LCA (Commercial PL20-0073)	Unknown	New 10-year LCA contract for a 72.66- acre property
LCA (Commercial PL20-0078)	3165 Pleasant Valley Road, Oxnard, CA	New 20-year LCA contract for a 48.69- acre property
LCA (Commercial PL20-0080)	1665 E. Fifth Street Camarillo, CA	New 10-year LCA contract for a 368.26-acre property
LCA (Commercial PL20-0081)	3165 Pleasant Valley Road, Oxnard, CA	New 20-year LCA contract for a 139.5 – acre property.
Agricultural Contractor's Service and Storage Yard (Commercial PL21-0015)	3150 Hailes Road, Oxnard, CA	CUP for a service and storage yard
Existing Packinghouse and Greenhouses (Commercial PL21-0045)	1070 Rice Avenue, Oxnard, CA	Permit Adjustment for various site improvements
LCA (Commercial PL21-0050)	Unknown	New LCA contract for Nitta Ranch
LCA (Commercial PL21-0064)	4130 Ventavo Drive, Moorpark, CA	New 10-year LCA contract
LCA (Commercial PL21-0076)	Unknown	New 20-year LCA contract for Araich Limited
LCA (Commercial PL21-0080)	Unknown	New 10-year LCA contract for Romanini Farms

Source: Select residential, commercial, and industrial projects identified by Mr. Jose Rivera (City of Oxnard – 3/9/22 email) to be included in the cumulative analysis from the City of Oxnard Planning Division Quarterly Project List, Updated April 2022 and from the County of Ventura, Recently Approved and Pending Projects, 7/6/22

2.7 CALIFORNIA NATIVE AMERICAN TRIBE CONSULTATION

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

As specified and in accordance with Assembly Bill (AB) 52 and Senate Bill (SB) 18, the RSD submitted project notification letters to 11 Native American tribal individuals and representatives for six Chumash tribes on September 2, 2022. The notification letters included the following six Chumash tribes:

- Barbareño/Ventureño Band of Mission Indians;
- Chumash Council of Bakersfield;
- Coastal Band of the Chumash Nation;
- Northern Chumash Tribal Council;
- San Luis Obispo County Chumash Council; and
- Santa Ynez Band of Chumash Indians.

RSD received a letter dated September 13, 2022 from the Santa Ynez Band of Chumash Indians requesting no further consultation on this proposed project. Consultation is still pending with the other five Chumash tribes.

The RSD will comply with local NAT during construction, including preconstruction notice.

3.0 ENVIRONMENTAL ANALYSIS

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

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

3.1 AESTHETICS

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

3.1.1 Environmental Setting

3.1.1.1 Existing Conditions

Scenic Routes

The proposed project is not located adjacent to a designated State scenic highway or eligible State scenic highway, as identified on the California Scenic Highway Mapping System (Caltrans 2018), and as is discussed in the Initial Study (Appendix A). The City, in conjunction with Ventura County and the City of Port Hueneme has selected routes for the City's Scenic Highway System (City of Oxnard 2006). The nearest of these routes to the project Site is Rose Avenue, between U.S. Route 101 and State Route 1. The scenic route portion of Rose Avenue is located approximately 0.5 miles to the south of the project Site. This route has scenic values because of its views of the Oxnard-Camarillo Greenbelt and in the distance the Los Padres Mountains.

Visual Character

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

The project Site is relatively flat; the main campus is a developed middle school campus. The northern campus agricultural learning program area is currently used for agriculture; and the southern campus expansion area includes a residence and is used for vehicle and farm equipment and agriculture. Existing views of the Site are shown in Figures 3-1 through 3-4. The Site is adjacent to agricultural land to the north and east, Rose Avenue and residential land to the west, and commercial land in the form of car dealerships to the south. According to the El Rio del Norte Area Plan included within the Ventura County General Plan (Ventura County 2020a), policies to protect and improve viewsheds from Rose Avenue within the plan area are included. The northern campus agricultural learning program area and southern campus expansion area fall within the boundary of the Oxnard-Camarillo Greenbelt.

Lighting

The central portion of the project Site is a developed middle school campus with existing associated lighting. The southern campus expansion area includes lighting associated with the residential use. The northern campus expansion area does not include any permanent sources of light. Light and glare sources in the vicinity of the project Site include the surrounding land uses described above and existing streetlights located on Rose Avenue.



Rio Del Valle Middle School

**Existing Conditions: Corner of Rose Avenue
and Corsicana Drive Looking Southeast**

Rio Del Valle Environmental Impact Report



TETRA TECH

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TC NO.	DATE	DRAWN BY	MAP NO.	FIGURE
41651	09/06/2022	BURSON		3-1



Rio Del Valle Middle School

**Existing Conditions: Corner of Rose Avenue
and Orange Street Looking Southeast**

Rio Del Valle Environmental Impact Report




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TC NO.	DATE	DRAWN BY	MAP NO.	FIGURE
41651	09/07/2022	BURSON		3-2



Rio Del Valle Middle School
**Existing Conditions: Corner of Rose Avenue
 and Collins Street Looking Northeast**
 Rio Del Valle Environmental Impact Report

 TETRA TECH		5383 Hollister Ave., Suite 130 Santa Barbara, CA 93111		
		TC NO. 41651	DATE 09/06/2022	DRAWN BY BURSON
		MAP NO.	FIGURE 3-3	



Rio Del Valle Middle School
Existing Conditions: Collins Street Looking Northwest
 Rio Del Valle Environmental Impact Report



TETRA TECH

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TC NO.	DATE	DRAWN BY	MAP NO.	FIGURE
41651	09/06/2022	BURSON		3-4

3.1.1.2 Regulatory Setting

Federal

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

State

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

Local

City of Oxnard 2030 General Plan Goals and Policies

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

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

- Goal CD-14** Expectations of higher quality design.
- CD-14.1** **Design Review Process.** In the evaluation of development proposals, continue to ensure that public and private development projects comply with City design policies, plans, and guidelines.
- Chapter 4, Infrastructure and Community Services, sets goals and policies for traffic and circulation, long-term water supply, parks, public safety, schools, and other public and semi-public facilities and services. Applicable goals and policies specific to aesthetic resources include:
- Goal ICS-2** A transportation system that supports existing, approved, and planned land uses throughout the City while maintaining a level of service “C” at designated intersections unless excepted.
- ICS-2.11** **Scenic Highway Preservation.** Preserve and enhance the character of scenic highways, and publicly owned and utility ROWs.
- Chapter 5, Environmental Resources, addresses the conservation, development, and use of natural resources, and also explores the managed production of resources, significant buildings and historic sites, water resources, biological, and agricultural resources. Applicable goals and policies specific to aesthetic resources include:
- Goal ER-6** Protected and enhanced natural setting and scenic resources.
- ER-6.1** **Incorporate Views in New Development.** Preserve important public views and viewsheds by ensuring that the scale, bulk, and setback of new development does not significantly impede or disrupt them and ensure that important vistas and view corridors are enhanced. Require development to provide physical breaks to allow views into these vistas and view corridors.
- ER-6.2** **Protect and Enhance Major Scenic Resources.** Protect and enhance the scenic resources of the beaches, Channel Island Harbor, windrows, farmland, the Channel Islands, and surrounding mountains.
- ER-6.5** **Control of Lighting and Glare.** Require that all outdoor light fixtures including street lighting, externally illuminated signs, advertising displays, and billboards use low-energy, shielded light fixtures which direct light downward and, where public safety would not be compromised, encourage the use of low-pressure sodium lighting for all outdoor light fixtures.
- Goal ER-9** Enhanced perceived character and quality of the City of Oxnard.
- ER-9.3** **Residential Street Lighting.** Provide residential street lighting that is appropriate in appearance, scale, and intensity for residential use.
- ER-9.4** **Human Scale Development.** Ensure that all new development emphasizes a human, pedestrian scale and minimizes its effect on the area’s sensitive visual resources.
- Goal ER-10** Enhanced landscape quality with an emphasis on landscape practices, management and plant species that are appropriate to Oxnard and its coastal climate.
- ER-10.1** **Promote use of Native and Water Wise Plants.** Promote the development of a native, drought-tolerant landscape character throughout the City that re-enforces a unified and cohesive landscape character and discourage plants that are invasive or problematic in other ways as determined by the City’s landscape architect.

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

3.1.2 Impact Analysis

3.1.2.1 Methodology

The visual impact a project may have is qualified through the examinations of the following factors: (1) the type of visual change that will result from the project; (2) the degree to which a project's visual characteristics or elements differ from the same visual elements established in the existing landscape; (3) the project's apparent size relative to other visible landscape features; (4) the degree to which a project's features change or block views of scenic resources; (5) the degree to which a project adds new sources of light or glare; and (6) the degree to which the project's visual features are visible from publicly accessible viewpoints. Landscapes with similar characteristics to a proposed project's features indicate a landscape more capable of accepting those project characteristics than a landscape where those elements are absent. This analysis examines the existing visual character of the project Site and surrounding area against the proposed project, analyzing the nature of the anticipated change.

3.1.2.2 Significance Thresholds

The thresholds for aesthetic resource impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project have a substantial adverse effect on a scenic vista such as an ocean or mountain view from an important view corridor or location as identified in the City of Oxnard 2030 General Plan or other City planning documents?*
- *Would the project, in non-urbanized areas substantially degrade the existing visual character or quality of public views of the site and its surroundings such as by creating new development or other physical changes that are visually incompatible with surrounding areas or that conflict with visual resource policies contained in the City of Oxnard 2030 General Plan or other City planning documents? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*
- *Would the project add to or compound an existing negative visual character associated with the project site?*
- *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

3.1.2.3 Project Impacts

Would the project have a substantial adverse effect on a scenic vista such as an ocean or mountain view from an important view corridor or location as identified in the City of Oxnard 2030 General Plan or other City planning documents?

The scenic route portions of Rose Avenue are located approximately 0.5 miles south of the project Site. Due to intervening terrain and structures, including commercial and residential buildings and Highway 101, and the curvature of Rose Avenue, the project Site is not visible from the scenic route portions of Rose Avenue.

Views of the Oxnard-Camarillo Greenbelt would primarily be from travelers on local roadways in the vicinity of the project Site including Rose Avenue and Collins Street. These are short duration viewers. Current views of the Oxnard-Camarillo Greenbelt, from Rose Avenue and Collins Street immediately adjacent to the project Site, are mostly limited to the immediate foreground due structures on the existing campus, fencing and raspberry production, including vegetation and shade structures, on the northern campus expansion area, and fencing, vehicle and farm equipment storage, residential use, and raspberry production, including vegetation and shade structures, on the southern campus expansion area. Views from Rose Avenue adjacent to the northern campus expansion area and

the main campus would not change significantly: agricultural activities would continue at the northern campus expansion area as an outdoor working farm “classroom”; and the improvements to the main campus would result in facilities and structures similar to existing conditions. Views from Rose Avenue adjacent to the southern campus expansion area would change from vehicle and farm equipment storage, residential use and agricultural uses to school buildings, recreational facilities, and parking. While the change would result in a small reduction of views of agricultural uses, the improvements would be harmonious with the existing middle school facilities. Therefore, the proposed project would not result in significant impacts to views of the Oxnard-Camarillo Greenbelt.

Would the project, in non-urbanized areas substantially degrade the existing visual character or quality of public views of the site and its surroundings such as by creating new development or other physical changes that are visually incompatible with surrounding areas or that conflict with visual resource policies contained in the City of Oxnard 2030 General Plan or other City planning documents? (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?

The existing main campus has a Ventura County General Plan land use and zoning designation of RE-20,000 SF; the northern campus and southern expansion areas have a Ventura County General Plan land use and zoning designations of AE-40 ac/MRP. Schools are prohibited within the County’s AE-40 zone. However, the proposed project includes annexation into the City of Oxnard, thereby the County’s land use and zoning designations would no longer be applicable to the project Site.

The existing main campus is also within the City of Oxnard’s SOI with a City of Oxnard General Plan land use designation of School. The northern campus and southern expansion areas are not within the City of Oxnard’s SOI and have a City of Oxnard General Plan land use designation of Agriculture. The proposed project includes annexation into the City of Oxnard. The proposed project would require annexation into the City of Oxnard, with associated SOI and CURB growth boundary amendments, all of which would require LAFCo approval. The District will process a General Plan Amendment (GPA), Pre-Zone (RZ) and an Annexation through the City of Oxnard. The proposed project will be required to be reviewed and recommended for approval to the City Council by the Planning Commission at a noticed public hearing prior to the City Council’s public hearing process and final action. If the project is approved by the City Council, the City will file a Resolution of Annexation with LAFCo. Upon approval of the reorganization and sphere amendments by LAFCo and a 30-day reconsideration period, the reorganization will be recorded, and the project Site will be annexed into the City of Oxnard. The proposed General Plan land use designation is School, and the proposed zoning designation is C-R. Schools are an allowed use within the C-R zone with approval of the special use permit (Oxnard Municipal Code Section 16-257). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with zoning and conflicts with applicable zoning would be less than significant.

Within the immediate project Site vicinity, the area can be characterized as urban with a mix of residential, school, commercial, and agricultural uses. Implementation for the proposed project would not change the character of the northern campus expansion area, which would remain agricultural, and main campus, which would remain a school use. The proposed project would change the character of the southern campus expansion area from vehicle and farm equipment storage, residential use, and agricultural uses to school uses. Construction and occupation of the proposed project would change the visual character of the project Site.

Visual impacts would result from temporary construction activities, including the presence of construction equipment, materials, and workers, at the project Site. Vehicles such as automobiles, pickup trucks, and dump trucks would be visible. Heavy equipment such as backhoes, graders, and excavators and workers would be visible during Site clearing, grading, construction, and Site cleanup. Construction equipment and activities would be seen by various viewers in proximity to the project Site, including travelers on Rose Avenue and Collins Street. Other viewers in the area include residents in the homes surrounding the project Site; however, these views are often obstructed by the existing walls and vegetation found on the west side of Rose Avenue. Construction activities

would be temporary and short-term and thus would have minimal effect on aesthetics and visual quality, resulting in a less than significant impact.

As previously stated, the northern campus expansion area will continue to be used for agriculture with a small outdoor lecture area added to the southeast corner of the northern campus expansion area parcel. Therefore, the visual character of the northern campus expansion area will remain consistent with existing conditions and no impact will occur.

New school and community recreational facilities under Civic Center Act or by Joint Use Agreement, will be added to the main campus. While configuration of these facilities will change in comparison to existing conditions, they will be consistent with the existing school character (see Figure 2-3).

Development of the southern campus expansion area would change the visual character of the southern campus expansion area by introducing newly designed school uses (recreational facilities, new buildings, and parking) to the area in comparison to existing conditions (a residence, vehicle and farm equipment, and agriculture) as shown in Figure 3-5 through Figure 3-8. The buildings would be one- to two-stories in height, in keeping with the characteristics of the existing school buildings. The project will be bordered by landscaping. The incorporation of landscaping would result in these features being the most visible elements along public street frontages. The visual characteristics of the southern campus expansion area would be consistent with the main campus and the developed areas surrounding the project Site. The eastern half of the southern campus expansion area will be composed of playfields as will the main campus. The playfields, in addition to the agricultural uses on the northern campus expansion area, will provide a visual segue way between the developed and agricultural environment located to the east and north of the project Site. The visual characteristics of the proposed project would be consistent with the developed areas immediately to the west and south. Therefore, project impacts to visual character and quality would be less than significant.

Existing



Simulation



Rio Del Valle Middle School

**Existing and Simulating Views: Corner
of Rose Avenue and Corsicana Drive
Looking Southeast**

Rio Del Valle Environmental Impact Report



TETRA TECH

5383 Hollister Ave., Suite 130
Santa Barbara, CA 93111

TC NO.
41651

DATE
09/06/2022

DRAWN BY
BURSON

MAP NO.

FIGURE

3-5

Existing



Simulation



Rio Del Valle Middle School

**Existing and Simulating Views: Corner
of Rose Avenue and Orange Street
Looking Southeast**

Rio Del Valle Environmental Impact Report



TETRA TECH

5383 Hollister Ave., Suite 130
Santa Barbara, CA 93111

TC NO.
41651

DATE
09/07/2022

DRAWN BY
BURSON

MAP NO.

FIGURE

3-6

Existing



Simulation



Rio Del Valle Middle School

**Existing and Simulating Views: Corner
of Rose Avenue and Collins Street
Looking Northeast**

Rio Del Valle Environmental Impact Report



TETRA TECH

5383 Hollister Ave., Suite 130
Santa Barbara, CA 93111

TC NO.
41651

DATE
09/06/2022

DRAWN BY
BURSON

MAP NO.

FIGURE
3-7

Existing



Rendered



Rio Del Valle Middle School

**Existing and Rendered Views:
Collins Street Looking Northwest**

Rio Del Valle Environmental Impact Report



TETRA TECH

5383 Hollister Ave., Suite 130
Santa Barbara, CA 93111

TC NO.
41651

DATE
09/06/2022

DRAWN BY
BURSON

MAP NO.

FIGURE
3-8

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

Approximately 1.8 acres of the southern campus expansion area are used for vehicle and farm equipment storage as shown in Figure 2-4. These elements have an industrial appearance and are not cohesive with the surrounding land uses. The proposed project would result in the removal of these elements and thereby improve the visual appearance. No significant impacts are expected.

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

The surrounding area is an urbanized area that contains a variety of artificial lighting sources. The main campus contains lighting associated with the school and the southern campus expansion area contains lighting associated with the existing residential use.

The proposed project would introduce new lighting to the project Site from exterior security and street lighting and from interior window spillage. Similar to existing conditions, it is anticipated that the middle school may be used in the evening for periodic school activities. This would result in some increased light and glare from vehicles entering or leaving the Site at night.

The proposed project would include exterior lighting around the buildings, recreational uses, walkways, and parking areas as needed for adequate safety and security at night. During Phase 1, underground utilities will be added to facilitate sports lighting for the football field and one of the soccer fields. Sports lighting will be installed at these fields during Phase 2. Additional sports lighting may be added to the tennis/pickleball courts and other play fields. The exterior finish of the proposed buildings would not include any highly reflective surfaces aside from standard glass windows.

According to the International Commission on Illumination (CIE 2003), light trespass varies according to surrounding environmental characteristics. Areas that are more rural in character, and therefore have few existing artificial sources of light, are more susceptible to impacts resulting from the installation of new artificial lighting sources. In contrast, urbanized areas are characterized by a large number of existing artificial lighting sources and are thus less susceptible to adverse effects associated with new artificial lighting sources.

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

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

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

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

Notes: fc footcandles
cd candelas

Source: CIE 2003

In this setting, light trespass impacts would be considered potentially significant if illuminance² produced by the project would impact sensitive receptors with lighting levels that exceed 0.9 fc during pre-curfew hours (before 11:00 p.m.) and 0.2 fc during the post-curfew hours.

The new sports lighting associated with the proposed project would be used to illuminate the activities of the football field and one of the soccer fields and potentially the tennis/pickleball courts and other play fields that may occur during non-daylight hours. There is the potential for the fields/courts to host evening events on a regular basis, including routine practices, games, and/or community events. It is anticipated that field lighting would be completely extinguished by approximately 10:30 p.m. at the latest. In no case would the artificial lighting elements for the field be used between 11:00 p.m. and dawn.

Light sensitive receptors that have the potential to be significantly impacted by project lighting elements include residences, including those closest to the project Site to the west. Lighting levels are affected by distance; specifically, as one approaches the nearby residences and the distance from the proposed lighting standards increases, lighting intensity would decrease at a rate of approximately 75% for each doubling of distance. Additionally, when two lighting sources are combined, the resulting illuminance only significantly increases if the individual lighting sources have similar lighting intensity at the point of observation when viewed individually.

The lighting levels from the proposed project will be designed to not exceed the threshold of 0.9 fc at the property line and based on similar school lighting will likely be much less or have no light trespass. The operation of the proposed lighting system would not result in significant adverse impacts related to light trespass. In urbanized locations the most common adverse effect of light trespass is disruption of sleep. Although the proposed project would potentially create spill light that would result in light trespass during pre-curfew hours, lighting would be extinguished by 10:30 p.m. at the latest. Furthermore, the nearby residential areas are located in an area of medium ambient brightness and the small increase in light trespass is considered a less than significant impact.

The proposed project would be constructed with materials and lighting that will be consistent with the lighting principles contained in the Community Design Element of the City of Oxnard General Plan (Oxnard 2011) and the Oxnard Municipal Code (Oxnard 2017), that require that all outdoor lights be designed, located, and arranged so as to reflect the light away from adjoining properties or streets. Campus lights will be shielded and directed downward to the extent feasible to minimize glare for pedestrians and drivers and to minimize spillover light. The landscaping buffers surrounding all the parking lots will also minimize and/or block campus lighting and any headlights from vehicles traveling on the project Site. While the proposed project would introduce new sources of light and glare; this change would be similar to existing light associated with the main campus, the adjacent residential and commercial uses and roads. Therefore, the proposed project would not result in a substantial source of light or glare and project impact would be less than significant.

3.1.2.4 Cumulative Impacts

Generally, projects located 3 or more miles from the project Site would not be visible within the same viewshed as the proposed project. Cumulative aesthetic impacts could occur as long as the proposed project contributes to visual changes to the landscape that are visible or perceived by the public, either within the same viewpoints, or as a noticeable element in a cumulative viewing experience (e.g., a driver on a local road). The only cumulative project within the same viewshed of the proposed project, is the Enterprise Auto Rental Office (Commercial 19-500-01) at the corner of Northwest Rose Avenue and Ventura Boulevard. It would involve development of a vacant lot with an auto rental office, auto car wash, and lot for 40 rental vehicles. The project would appear cohesive with the adjacent commercial uses and parking lot and would not impact any significant scenic resource. Both this cumulative project

² Measured in footcandles, illuminance is the intensity of light falling on a surface.

and the proposed project would have the appearance of cohesive infill projects and would not result in a significant cumulative impact.

3.1.2.5 Mitigation Measures

No Mitigation Measures are required.

3.1.2.6 Level of Impact After Mitigation

Project impact is less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

This section describes the proposed project's potential to affect important agricultural resources in the local area. As noted in the Initial Study (Appendix A), potential project impacts associated with a Williamson Act contract, existing zoning for forest or timber land, loss or conversion of forest land, and other changes resulting in loss of forest land to other uses were found to result in no impact and are not discussed further in the EIR.

3.2.1 Environmental Setting

3.2.1.1 Existing Conditions

Ventura County is recognized as one of the principal agricultural counties in the State of California, with over 95 varieties of crops and 2,150 farms totaling over 281,000 acres (Ventura County 2020a). Agriculture generates a substantial number of jobs ranging from crop production to processing, shipping and other related industries. The temperate local climate, the availability of water and level topography, and the depth of high quality soils allows for the farming of a wide range of crops.

Estimated gross values revenue sales of agricultural products in Ventura County decreased from approximately \$1.99 billion in 2019 to approximately \$1.98 billion in 2020 (Ventura County Agricultural Commissioner 2020). The largest increases in crop values from 2019 to 2020 were in the fruit and nut crops and nursery stock groupings. The largest decreases in crop values from 2019 to 2020 were in the field crops, vegetable crops, and livestock and poultry groupings. Table 3-2 shows the 2019 and 2020 values of major crop groupings in Ventura County.

Table 3-2. 2019 and 2020 Crop Grouping Values in Ventura County

Crop Grouping	Year	Value ¹
1. Fruit and Nut Crops	2020	\$1,240,837,000
	2019	\$1,104,656,000
2. Vegetable Crops	2020	\$497,124,000
	2019	\$601,545,000
3. Nursery Stock	2020	\$193,135,000
	2019	\$187,467,000
4. Cut Flowers	2020	\$33,917,000
	2019	\$46,153,000
5. Field Crops	2020	\$7,464,000
	2019	\$37,337,000
6. Apiary Products	2020	\$5,792,000
	2019	\$4,784,000
7. Livestock and Poultry	2020	\$5,209,000
	2019	\$6,536,000
8. Biological Control	2020	\$1,887,000
	2019	\$1,713,000

Source: Ventura County Agricultural Commissioner 2020

Notes: ¹ Figures are rounded off to nearest \$1,000

The conversion of agricultural land to non-agricultural land uses is monitored by the CDC Farmland Mapping and Monitoring Program (FMMP). The conversion of important farmland in Ventura County from 2016 to 2018 is illustrated in Table 3-3.

Table 3-3. Ventura County 2016-2018 Farmland Acreage Changes

Land Use Category	Total Acreage Inventoried		2015-2018 Acreage Changes			
	2016	2018	Acres Lost (-)	Acres Gained (+)	Total Acreage Changed	Net Acreage Changed
Prime Farmland	40,976	40,7640	463	249	712	-214
Farmland of Statewide Importance	32,992	32,926	155	82	237	-73
Unique Farmland	28,949	28,764	796	612	1,408	-184
Farmland of Local Importance	15,591	15,818	270	501	771	+231
Total	118,508	118,272	1,684	1,444	3,128	-240

Source: CDC 2022a

The City of Oxnard's Mediterranean climate, fertile topsoil, adequate water supply, and long harvest season combine to provide favorable agricultural conditions in the surrounding Oxnard plain that is the center of a regional agricultural industry (City of Oxnard 2009). The City of Oxnard contains some of the most fertile land in Ventura County. Important Farmlands account for the majority of farmland (22,960 acres) within the City of Oxnard and its SOI (City of Oxnard 2006).

The project Site is located in unincorporated Ventura County, California. The existing campus is outside of the Oxnard-Camarillo Greenbelt and the Ventura County Save Open-Space and Agricultural Resources (SOAR) boundary, but within the City of Oxnard's SOI and CURB; the northern campus and the southern expansion areas are within the Oxnard-Camarillo Greenbelt and Ventura County SOAR boundaries, and outside of the City of Oxnard SOI and CURB.

The existing campus has a Ventura County General Plan land use and zoning designation of RE-20,000 SF; the northern campus and southern expansion areas have a Ventura County General Plan land use and zoning designations of AE-40 ac/MRP. The City of Oxnard General Plan land use designation for the existing campus is School; the designation for the northern campus and southern expansion areas is Agriculture.

The approximately 20.2-acre main campus is currently occupied with school uses. The approximately 10-acre northern campus expansion area is currently used for the cultivation of organic raspberries. The approximately 11.1-acre southern campus expansion area currently contains approximately 0.3-acre of residential use, 0.25-acre tenant storage yard, 0.45-acre junk vehicle storage area, 1.1-acre farm equipment storage and parking area, and a 0.3-acre farmyard. The remaining 8.7 acres of the southern campus expansion area is used for cultivation organic raspberry production.

The CDC FMMP identifies approximately 17.2 acres (or 41%) of the project Site as Prime Farmland and 3.8 acres (or 9%) as Farmland of Statewide Importance (CDC 2022b). According to the U.S. Department of Agriculture (USDA), Soil Conservation Service, Soil Survey of the project Site, the majority of the on-Site soils consists of Pico sandy loam (PcA) and also contains Anacapa sandy loam (AcA), Camarillo sandy loam (Cc), and Metz loamy sand (USDA NRCS 2022). Soils are placed in grades according to their suitability for general intensive farming as indicated by their Storie Index ratings.

The project Site is surrounded by adjacent residential and agricultural uses to the north, agricultural land to the east, commercial (car dealerships) to the south, and residential uses to the west. The agricultural land to the east is also located within the Ventura-Oxnard Greenbelt.

3.2.1.2 Regulatory Setting

Federal

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

State

Farmland Mapping and Monitoring Program (FMMP)

The goal of the FMMP is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, FMMP provides maps and statistical data to the public, academia, and government agencies to assist them in making informed decisions for the utilization of California's farmland (CDC 2004). FMMP was established in 1982 in response to a need for assessing of agricultural lands and informing decisions affecting conversion of these lands over time. FMMP regularly reports on the conversion of farmland and grazing lands and provides maps and maintains a database system to record and report changes in the use of agricultural lands throughout California.

Important Farmland mapping efforts were initially begun in 1975 by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS), and now continued through the FMMP. The intent was to produce agricultural resource maps based on soil quality and land use across the nation. As part of this nationwide mapping effort, NRCS developed a series of definitions known as the Land Inventory and Monitoring (LIM) criteria. The LIM criteria classified the land's suitability for agricultural production, which included physical and chemical characteristics of soils, as well as specified land use characteristics. Important Farmland Maps are derived from NRCS soil survey maps using LIM criteria (CDC 2004).

Important Farmlands

Important farmland maps are compiled by the FMMP, pursuant to the provisions of Section 65570 of the California Government Code. These maps, utilizing data from the NRCS soil survey and current land use information using eight mapping categories, represent an inventory of agricultural resources within Ventura County. The maps depict currently urbanized lands and a qualitative sequence of agricultural designations. Maps and statistics are produced biannually using a process which integrates aerial photo interpretation, field mapping, a computerized mapping system and public review.

Land is classified into one of eight categories (five relating to farming and three associated with nonagricultural purposes) which include: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land. Prime Farmland is defined as having the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. Farmland of Statewide Importance is land similar to prime farmland but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date.

Local

County of Ventura Agricultural/Urban Buffer Policy

This Policy's purpose is to ensure that farming can continue even with urban neighbors. The Policy provides guidelines to reduce agricultural/urban interface conflicts and to protect the public health, safety, and welfare of the citizens of Ventura County and protect the economic viability and long-term sustainability of the Ventura County agricultural industry. The Policy applies where urban structures or ongoing non-farming activities are permitted adjacent to land 1) in crop or orchard production; or 2) classified by the California Department of Conservation Important Farmland Inventory as Prime, Statewide Importance, Unique or Local Importance farmland. These

guidelines apply to projects requiring discretionary approval by the county or a city where the proposed non-farming activity is abutting or on land zoned AE, OS or RA, and the farming activity is located outside a SOI, as adopted by the LAFCo. The Agricultural Policy Advisory Committee (APAC) or the Agricultural Commissioner may grant an exemption to these policies on a case-by-case basis, where physical factors prevent or alleviate the need for compliance. Where applicable, urban developments or non-agricultural uses shall be conditioned to provide and maintain a 300-foot setback and reinforced 8-foot chain link fence with top bar on the non-agricultural property between the urban use and the agriculture, or a 150-foot buffer/setback if a vegetative screen as defined in the Policy.

Minimum standards for the vegetative screen (when required) include:

- Two staggered rows of trees and shrubs characterized by evergreen foliage that extends from the base of the plant to the crown;
- Trees and shrubs should be vigorous, drought tolerant, and at least 6 feet in height at the time of installation;
- Plants should have 50 percent (%) to 75% porosity (i.e., approximately 50% to 75% of the plant is air space);
- Plant height should vary in order to capture drift within 4 feet of ground applications;
- A mature height of 15 feet or more is required for trees;
- To ensure adequate coverage, two staggered rows should be located 5 feet apart and consist of a minimum of 5 gallon plants at least 6 feet tall planted 10 feet on center;
- Recommended plants include: Toyon (*Heteromeles arbutifolia*), Sugarbush (*Rhus ovata*), Laurel sumac (*Malosma laurina*) and Italian cypress (*Cupressus sempervirens*); and
- A long-term plan shall be in place for maintaining the vegetative shelter belt.

The Policy discourages K-12 school construction within one-quarter mile of agriculture and states that for all K-12 school construction within 300 feet of agriculture:

- A public meeting by APAC is required; and
- The recommendations in *Farming Near Schools, A Community Guide for Protecting Children* (Ag Futures Alliance 2002) shall be followed by both the farmer and the school.

Ventura County 2040 General Plan and El Rio/Del Norte Area Plan

The Ventura County 2040 General Plan Goals and Policies for agriculture most relevant to the proposed project are as follows:

Agriculture Element

- Policy AG-1.1: Agricultural Land Protection and Preservation. The County shall continue to protect and preserve agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements.
- Policy AG-1.2: Agricultural Land Use Designation. The County shall ensure that discretionary development located on land designated as Agricultural on the General Plan Land Use Diagram and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory is planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.

- Policy AG-1.3: Greenbelt Agreements. The County shall preserve agricultural land by retaining and expanding existing Greenbelt Agreements and encouraging the formation of additional Greenbelt Agreements.
- Policy AG-2.1: Discretionary Development Adjacent to Agriculturally Designated Lands. The County shall ensure that discretionary development adjacent to Agriculturally designated lands does not conflict with agricultural use of those lands.
- Policy AG-2.3: Right-to-Farm Ordinance. The County's Right-to-Farm Ordinance shall be maintained and updated as needed to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas.

County of Ventura Right-to-Farm Ordinance (Ordinance No. 4151)

This Ordinance is intended to protect the farming community from developments that would inhibit their ability to continue agricultural production. The Ordinance consists of two components, the first of which is found in the enforcement sections of the Coastal and Non-Coastal Zoning Ordinances. These sections of the code protect farmers engaged in agricultural activity from public nuisance claims. The second component requires mandatory disclosure to neighboring property owners of the potential noise, odors, dust, and spraying that may result from farming and details procedures for mediation of disputes that may arise. This section of the "Right to Farm" Ordinance puts a new purchaser of property on notice that existing agricultural operations inherently have noise, odor, and other potentially annoying activities that are associated with accepted agricultural operations.

City of Oxnard Urban Restriction Boundary (CURB) and County of Ventura and City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinances

In 1998, the voters of the City of Oxnard adopted the SOAR initiative establishing the CURB and re-designating as "Agriculture (AG)" all land previously designated "Agricultural Planning Reserve (AG/PR)." CURB defined the urban development boundary for the City of Oxnard until December 31, 2020. In 2016, City of Oxnard voters passed an initiative to extend the CURB to 2050.

The SOAR initiative also established a City Buffer Boundary (CBB) which lies outside of the CURB line and is coterminous with the Oxnard Area of Interest. Changes to the CURB line or an agricultural land use designation within the CBB generally requires majority approval of Oxnard voters, with certain exceptions, including but not limited to an exception to allow up to 20 acres per year to be brought into the CURB for affordable housing needed to meet the City's Regional Housing Needs Assessment (RHNA) target production. The City of Oxnard 2030 General Plan expressly preserves these SOAR requirements.

Like the City of Oxnard's SOAR ordinance, the County of Ventura's SOAR ordinance was also passed in the 1990s and has since been extended to 2050. Unlike the City of Oxnard's SOAR ordinance, however, the County of Ventura's SOAR ordinance requires a majority vote of the people to rezone unincorporated open space, agricultural, or rural land for development.

Oxnard-Camarillo Greenbelt Agreement

In 1984, the City of Oxnard (Resolution No. 8616), County of Ventura (Board of Supervisors Resolution No. 222), and City of Camarillo (Resolution No. 84-9) approved the Oxnard-Camarillo Greenbelt Agreement. The agreement established a Greenbelt intended for long-term agricultural use that generally cannot be converted to urban development without voter approval or amending the agreement. This greenbelt largely defines the City of Oxnard's northeast and east boundaries.

City of Oxnard 2030 General Plan Goals and Policies

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

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

3.2.2 Impact Analysis

3.2.2.1 Methodology

City of Oxnard

Under the 2017 City of Oxnard CEQA Guidelines for determining potential impacts to agricultural resources, a project may have direct and/or indirect effects related to the conversion of agricultural land to other uses (City of Oxnard 2017). Direct effects would occur if the project would occur on existing farmland and would result in the development of a different use such as a residential neighborhood or shopping center. The identification of important farmland should be based on City mapping or on mapping available from the CDC.

The determination of whether a specific project would have a significant and unavoidable impact relative to the direct conversion of important farmland requires the consideration of factors unique to the specific project. In order to analyze factors unique to the proposed project, methodology developed by the CDC and the County of Ventura described below, was used.

California Department of Conservation

In determining whether impacts to agricultural resources are significant environmental effects, the lead agency may refer to the California Agricultural Land Evaluation and Site Assessment (LESA) Model (1997) prepared by the CDC to assess impacts on agriculture and farmland. The LESA system is a point-based model that is generally used for rating the relative value of agricultural land resources. The CDC developed a LESA Model to "provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process" (Public Resources Code Section 21095).

The California Agricultural LESA Model is composed of six different factors. Two Land Evaluation factors are based upon measures of soil resources quality that are separately rated:

1. The USDA Land Capability Classification (LCC) Rating – The LCC indicates the suitability of soils for most kinds of crops. Groupings are made according to the limitations of the soils when used to grow crops and the risk of damage to soils when they are used in agriculture. Soils are rated from Class I to Class VIII, with soils having the fewest limitations receiving the highest rating (Class I). Specific subclasses are also utilized to further characterize soils. An expanded explanation of the LCC is included in most soil surveys.
2. The Storie Index Rating – The Storie Index provides a numeric rating (based upon a 100-point scale) of the relative degree of suitability or value of a given soil for intensive agriculture. The rating is based upon soil characteristics only. Four factors that represent the inherent characteristics and qualities of the soil are considered in the index rating. The factors are as follows: profile characteristics, texture of the surface layer, slope, and other factors (e.g., drainage, salinity).

In order to assess the LCC and Storie Index factors, the soils within the project area were identified using a custom Soil Resource Report from the USDA Natural Resources Conservation Service (USDA NRCS 2022).

Four Site Assessment factors provide measures of a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, each of these factors is separately rated on a 100-point scale.

The LESA Model is weighted so that 50% of the total LESA score of a given project is derived from the Land Evaluation factors, and 50% from the Site Assessment factors as follows:

Land Evaluation factors: weight 50% of total LESA score

- Land Capability Classification factor weight: 25%
- Storie Index factor weight: 25%

Site Assessment factors: weight 50% of total LESA score

- Project Size factor weight: 15%
- Water Resource Availability factor weight: 15%
- Surrounding Agricultural Land factor weight: 15%
- Protected Resource Land factor weight: 5%

It is this project score that becomes the basis for making a determination of a project's potential significance, based upon a range of established scoring thresholds (CDC 1997). The final score is evaluated based on the LESA Model Significance Determination from the California Agricultural LESA Model Instruction Manual (CDC 1997), shown in Table 3-4.

Table 3-4. LESA Model Significance Determination

Total LESA Score	Scoring Decision
0–39 Points	Not considered significant
40–59 Points	Considered significant <i>only</i> if both the Land Evaluation and Site Assessment (found in Table E from the California Agricultural Land Evaluation and Site Assessment Instruction Manual [CDC 1997]) weighted factor subscores are each <i>greater</i> than or equal to 20 points.
60–70 Points	Considered significant <i>unless</i> either of the Land Evaluation and Site Assessment weighted factor subscores is <i>less</i> than 20 points.
80–100 Points	Considered significant

A LESA analysis was prepared for the proposed project.

County of Ventura

Under the County of Ventura's adopted Initial Study Assessment Guidelines (ISAG), the significance of loss of Important Farmland is determined based on general plan land use designation, important farmland inventory classification, and acres lost. Under the ISAG, conversion of 5 or more acres of farmland of Prime or Statewide Importance with an Agriculture land use designation is considered significant.

3.2.2.2 Significance Thresholds

The thresholds for agricultural resources impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. An affirmative answer to any of the following questions typically indicates a potentially significant agricultural resource impact. A "no" response to all questions indicates that there would be no significant impact to agricultural resources.

- *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?*
- *Would the project conflict with existing zoning for agricultural use of an existing Williamson Act contract?*
- *Would the project involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

3.2.2.3 Project Impacts

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

The CDC FMMP identifies the 9 acres (or 90%) of the approximately 10-acre northern campus expansion area as Prime Farmland and 0.9 acres (or 9%) as Farmland of Statewide Importance (CDC 2022b). As described in Section 2.4, Project Description, no land use changes to the northern campus expansion area are currently proposed as part of the proposed project. Approximately 10 acres on the northern campus expansion area of the project Site is currently utilized for agriculture and RSD plans to utilize the Site as an outdoor working farm "classroom." No utility expansion is proposed in this area. An outdoor lecture area and a small, paved pathway are planned for this area. Possible fencing may be added for security. A Notice of Exemption (NOE) for the purchase and use of the northern campus expansion area for an agricultural learning program was filed and posted with the Ventura County Clerk on August 11, 2021; no challenges to the NOE were filed. As the proposed project would not convert the northern campus expansion area to a non-agricultural use, no significant impacts would occur.

The approximately 20.2-acre main campus is a developed middle school campus and is identified by the CDC FMMP as Urban and Built Up Land. As the improvements to the main school campus would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, no significant impacts would occur.

The proposed project plans to develop the southern campus expansion area with school uses including classrooms, recreational facilities, and parking facilities. The CDC FMMP identifies the 8.2 acres (or 74%) of the approximately 11.1-acre southern campus expansion area as Prime Farmland and 2.9 acres (or 26%) as Farmland of Statewide Importance (CDC 2022b). As previously described, the approximately 11.1-acre southern campus expansion area currently contains approximately 0.3-acre of residential use, 0.25-acre tenant storage yard, 0.45-acre junk vehicle storage area, 1.1-acre farm equipment storage and parking area, and a 0.3-acre farmyard. The remaining 8.7 acres of the southern campus expansion area is used for cultivation organic raspberry production. Approximately 0.3

acres of the southern campus expansion area has been developed with the residence for over 28 years (Tetra Tech 2021a). It is considered unlikely that this acreage would be redeveloped to active agricultural production and therefore, these 0.3 acres are not considered farmland. An additional 2.1 acres are either being used for non-agricultural production activities or agricultural support activities for over 3 years. While these acres are not under active agricultural production, these uses could more easily be removed, and the acres returned to active agricultural production. For a more conservative analysis, these additional 2.1 acres plus the 8.7 acres under active agricultural production are considered farmland for the LESA model and the impact analysis. Therefore, this analysis considers the impacts associated with the proposed project's conversion of approximately 7.9 acres of Prime Farmland and 2.9 acres Farmland of Statewide Importance.

A LESA was prepared for the non-residential portion of the southern campus expansion area that considered the six factors of the LESA Model: two Land Evaluation factors comprised of LCC and Storied Index ratings; and four Site Assessment factors comprised of the area's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands.

Soils within the non-residential portion of the southern campus expansion area were identified using a custom Soil Resource Report (USDA NRCS 2022). The LCC and Storie Index scores generated using the LESA model are shown in Table 3-5.

Table 3-5. Land Capability Classification and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit ¹	Project Acres	Percent of Project Area	LCC ¹	LCC Rating ²	LCC Score (C x E)	Storie Index ¹	Storie Index Score (C x G)
PcA	6.6	61%	lis ³	80	49	86	53
AcA	0.3	3%	lie ³	95	3	95	3
Cc	2.9	27%	liw ³	80	22	71	19
MeA	1	9%	llls ³	60	6	64	6
Totals	10.8	100		LCC Total Score	80	Storie Index Total Score	81

Notes: ¹ The Soil Map Unit information and acreage, LCC and Storie Index information were determined from the current soil survey information available at the U.S. Department of Agriculture Natural Resources Conservation Service (USDA-NRCS 2022)

² The LCC Rating for irrigated land was determined from the LCC Point Rating Table 2 from the California Agricultural Land Evaluation and Site Assessment Model Instruction Manual (CDC 1997)

³ Irrigated

The Size score is based on the amount of acreage of each soil class type. For an area with approximately 9.8 acres of Class 2 soils and approximately 1 acre of Class 3 soils, the score is 0 points.

The Water Resource Availability score is based on the type of irrigation present on the project site and upon the feasibility of irrigation in drought and non-drought years, and whether physical or economic restrictions are likely to exist. As irrigation has been historically conducted at the southern campus expansion area, the Water Resource Availability score is 80 and the weighted factor score is 12.

The Surrounding Agricultural Land Use score is based on the percentage of land in agricultural use in the area's Zone of Influence (ZOI). The ZOI is the surrounding land within one quarter mile of the area. Approximately 21% of the land in the area's ZOI is in agricultural use. When the percentage within the ZOI is under 40%, the corresponding

Surrounding Agricultural Land score is 0. No lands in the area's ZOI are under a Williamson Act contract; therefore, the Protected Resource Lands score is 0.

As shown in Table 3-6, a final LESA score ranging from 40–59 points is considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. (CDC 1997). The final LESA score for the proposed project is 52 and the Site Assessment subscore is less than 20 points as shown in Table 3-6. Under the CDC LESA methodology, the proposed project will not have a significant impact on agricultural land use on the project Site or ZOI.

While the proposed project was found to not have a significant impact on agricultural land use under the CDC LESA methodology, the proposed project would involve the conversion of greater than 5 acres of Prime/Statewide Important Farmland. Under the County of Ventura ISAG criteria, the proposed project would result in a significant impact due to the conversion of important farmland to non-farmland uses.

The City has determined that conversion of agricultural land is a project-level impact and requires a mitigation measure to offer the topsoil for removal to another farm operation, if feasible, as a partial mitigation for the loss of prime farmland impact (City of Oxnard 2012). The City has policies that encourage establishment of a farmland protection program and use of conservation easements and land banking to protect continued agricultural uses throughout the City's SOI and policies and programs that support existing agricultural buffers (such as the SOAR Ordinance) in order to reduce or slow further loss of agricultural resources, however, these policies do not offset an actual loss of farmland acreage. No additional feasible mitigation measures are currently available to reduce this impact to a less than significant level, therefore this impact would remain significant and unavoidable (City of Oxnard 2009).

Mitigation Measure AG-1 is provided to mitigate for the loss of important farmland. Nonetheless, conversion of agricultural land would remain a significant and unavoidable impact.

Table 3-6. Land Evaluation and Site Assessment (LESA) Model Score

Factor	Factor Rating (0-100 points)	Factor Weight (Total = 100)	Weighted Factor Rating
<u>Land Evaluation</u>			
Land Capability Classification	80	0.25	20
Storie Index Rating	81	0.25	20
<i>Land Evaluation Sub-score</i>			40
<u>Site Assessment</u>			
Project Size	0	0.15	0
Water Resource Availability	80	0.15	12
Surrounding Agricultural Lands	0	0.15	0
Protected Resource Lands	0	0.05	0
<i>Site Assessment Sub-score</i>			12
Final LESA Score			52

Would the project conflict with existing zoning for agricultural use?

The existing campus has a Ventura County General Plan land use and zoning designation of RE-20,000 SF; the northern campus and southern campus expansion areas have a Ventura County General Plan land use and zoning designations of AE-40 ac/MRP. Schools are prohibited within the County's AE-40 zone. However, because the proposed project includes annexation into the City of Oxnard, the County's land use and zoning designations would no longer be applicable to the project Site.

The existing campus is also within the City of Oxnard's SOI with a City of Oxnard General Plan land use designation of School. The northern campus and southern campus expansion areas are not within the City of Oxnard's SOI and have a City of Oxnard General Plan land use designation of Agriculture. The proposed project includes annexation into the City of Oxnard. The proposed project would require annexation into the City of Oxnard, with associated SOI and CURB growth boundary amendments, all of which would require LAFCo approval. The District will process a GPA, RZ, and an Annexation through the City of Oxnard. The proposed project will be required to be reviewed and recommended for approval to the City Council by the Planning Commission at a noticed public hearing prior to the City Council's public hearing process and final action. If the project is approved by the City Council, the City will file a Resolution of Annexation with LAFCo. Upon approval of the reorganization and sphere amendments by LAFCo, and a 30-day reconsideration period, the reorganization will be recorded, and the project Site will be annexed into the City of Oxnard. The proposed General Plan land use designation is School, and the proposed zoning designation is C-R. Schools are an allowed use within the C-R zone with approval of the special use permit (Oxnard Municipal Code Section 16-257). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with zoning. Impacts would be less than significant.

The northern and southern campus expansion areas are located within the greenbelt established by the 1984 "Joint Resolution of the City Councils of the City of Camarillo and the City of Oxnard and the County of Ventura Establishing a Greenbelt Between North and South of the Two Cities." As part of the proposed project, the District is requesting that this agreement be amended. Specifically, the map is to be amended to exclude the proposed northern and southern campus expansion areas. If the requested amendment is approved by all parties (City of Camarillo, City of Oxnard, County of Ventura), the proposed project would then be consistent with this policy and the impact would be less than significant.

The northern campus and southern campus expansion areas are also within the Ventura County SOAR boundaries and outside of the City of Oxnard SOI and CURB. While the northern campus expansion area would continue to be used for agriculture and educational purposes, the southern campus expansion area would be converted to a non-agricultural use. Both conversions would be allowed if the requested CURB amendment is approved. If the required discretionary approvals are granted, the proposed project would be exempt from the SOAR ordinance and the impact would be less than significant.

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

The project Site is surrounded by adjacent residential and agricultural uses to the north, agricultural land to the east, commercial (car dealerships) to the south, and residential uses to the west. The agricultural land to the east is also located within the Ventura-Oxnard Greenbelt.

As discussed above, the proposed project would not convert the northern campus expansion area or the main campus to non-agricultural uses. Indirect impacts could occur with the conversion of the southern campus expansion area from agricultural uses to school uses. This type of impact is mainly due to compatibility issues with the adjacent agricultural land still in production (City of Oxnard 2009). Potential compatibility issues may include nuisance effects to a project site from noise, dust, odors, and drift of agricultural chemicals. The adjacent agriculture uses could experience restrictions on the use of agricultural chemicals, complaints regarding noise and dust, and vandalism and pilfering of crops. These conflicts could potentially result in increased costs to the agricultural operation and encouraged conversion of additional agricultural lands (including Important Farmlands) to urban uses.

The development of the southern campus expansion area would involve the conversion of a small amount of farmland to non-agricultural uses. This area is currently surrounded on three sides by commercial, residential, and school uses. In addition, the existing main campus of the project Site has been developed with a middle school

campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. The development of the southern campus expansion area would be expected to result in similar compatibility.

The City of Oxnard 2030 General Plan contains policies intended to reduce this type of land use incompatibility including policies CD-6.1 and ER-12.11 (providing adequate agricultural buffer areas) and policy ER-12.2 (supporting right-to-farm policies).

The County of Ventura Agriculture/Urban Buffer Policy also provides guidelines to prevent and/or mitigate agricultural/urban interface compatibility issues. Per the County of Ventura Agriculture/Urban Buffer Policy, a 300-foot setback from adjacent agricultural uses to new structures and sensitive uses is required on the non-agricultural property unless a vegetative screen is installed. With a vegetative screen, the buffer/setback is a minimum of 150 - feet. These guidelines apply to projects requiring discretionary approval by the county or a city where the proposed non-farming activity is abutting or on land zoned AE, OS, or RA, and the farming activity is located outside a SOI, as adopted by LAFCo. However, the proposed project includes annexation into the City of Oxnard with a proposed C-R zone; therefore, the County's land use designations would no longer be applicable to the project Site. As such, these guidelines would not apply to the proposed project.

While the County of Ventura Agriculture/Urban Buffer Policy would not apply to proposed project, the District has designed the lay-out of the proposed project in order to minimize compatibility issues with adjacent agricultural uses. The proposed project has been designed with parking and recreational facilities along the northern and eastern sides of the main campus. The southern campus expansion area will be developed with parking and recreational facilities. This design will provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east.

In addition, as appropriate and applicable, the District will follow recommendations in *Farming Near Schools, A Community Guide for Protecting Children* (Ag Futures Alliance 2002).

With the implementation of these policies, as appropriate, to compatibility issues impacts associated with compatibility issues, conversion of the southern campus expansion area from agricultural uses to non-agricultural uses would be less than significant.

3.2.2.4 Cumulative Impacts

Buildout of the City would result in the conversion of up to 2,000 acres of important farmland including 770 acres of Prime Farmland and 1,230 acres of Farmland of Statewide Importance (City of Oxnard 2009). In the County, almost all Important Farmland categories have been on the decline. Between 1984 and 2016, Prime Farmland decreased approximately 16,000 acres (County of Ventura 2020a). The proposed project would contribute to the cumulative loss of agricultural lands within the region, specifically acres of Prime Farmland and Farmland of Statewide Importance. As discussed above, City or County policies and programs to reduce or slow further loss of agricultural resources do not offset an actual loss of farmland acreage. No additional feasible mitigation measures are currently available to reduce the project's contribution to this significant cumulative impact to a less than significant level, therefore this cumulative impact would remain significant and unavoidable.

3.2.2.5 Mitigation Measures

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

AG-1: The District shall offer at cost the top 12 inches of the Prime Farmland and Farmland of Statewide importance soils from the southern campus expansion area for relocation to a farm site or farm sites that have lower quality soils. The cost will include suitable replacement soil, if needed for Site improvements.

3.2.2.6 Level of Impact After Mitigation

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

3.3 AIR QUALITY

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

3.3.1 Environmental Setting

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

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

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

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

3.3.1.1 Existing Conditions

As of July 31, 2022, the United States Environmental Protection Agency (U.S. EPA) listed Ventura County as attainment for all standards except the federal 8-Hour O₃ (U.S. EPA 2022b). Similarly, as of June 2020, the California Air Resources Board (CARB) lists Ventura County as attainment for all pollutants except the 8-Hour O₃ and PM₁₀ standards (CARB 2020). A summary of attainment for Ventura County is outlined in Table 3-7.

Table 3-7. Attainment Status of Ventura County

Pollutant	National Attainment Status ¹	State Attainment Status ²
1-Hour Ozone	Not applicable	Nonattainment
8-Hour Ozone	Nonattainment – Serious	Nonattainment
PM _{2.5}	Unclassified/Attainment	Attainment
PM ₁₀	Unclassified	Nonattainment
Carbon Monoxide	Unclassified/Attainment	Attainment
Nitrogen Dioxide	Unclassified/Attainment	Attainment
Sulfur Dioxide	Unclassified/Attainment	Attainment
Lead	Unclassified/Attainment	Attainment
Sulfates	No standard	Attainment
Hydrogen Sulfide	No standard	Unclassified
Visibility Reducing Particles	No standard	Unclassified

Source: 1 U.S. EPA 2022b

2 CARB 2020

3.3.1.2 Regulatory Setting

Federal

The U.S. EPA classifies the air quality within an area with regard to its attainment of federal primary and secondary NAAQS. Primary standards prescribe the maximum permissible concentration in the ambient air and are required to protect public health. Secondary standards specify levels of air quality required to protect public welfare, including materials, soils, vegetation, and wildlife, from any known or anticipated adverse effects (U.S. EPA 2022b). NAAQS are established for six pollutants (known as criteria pollutants): ozone (O_3), particle pollution (i.e., respirable particulate matter equal to and less than 10 microns in diameter [PM_{10}] and respirable particulate matter equal to and less than 2.5 microns in diameter [$PM_{2.5}$]), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). A summary of NAAQS is provided in Table 3-8. Under the Clean Air Act Amendments of 1990 (CAAA) directive, attainment and maintenance of NAAQS is required.

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

Ozone at the ground level is not emitted directly into the air. Instead, it is formed from a reaction between oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) in the presence of sunlight. NO_x is produced from the combustion of fossil fuels (e.g., diesel, gasoline, and natural gas) through various processes including vehicles, furnaces, and boilers. VOCs are emitted from solvent and/or solvent based products such as architectural coatings and degreasers. Ozone is harmful to health particularly in young children, the elderly, and populations with respiratory conditions such as asthma.

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

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

Nitrogen dioxide is the primary member and used as the indicator for of the family of NO_x . NO_2 results from the burning of fuel in a variety of sources including cars, trucks and buses, power plants, and off-road equipment. NO_2 can react with other pollutants to form O_3 and PM. NO_2 can primarily affect the respiratory system in humans. Short-term exposure to high concentrations of NO_2 can aggravate existing respiratory conditions such as asthma. Long-term exposure to NO_2 can result in the development of respiratory diseases such as asthma.

Sulfur dioxide is the primary member of and used as the indicator for the family oxides of sulfur (SO_x). SO_2 results from combustion of fuels primary at power plants and other industrial facilities. SO_2 reacts with other pollutants to form fine PM. SO_2 affects the respiratory system in humans, and at high concentrations, it can damage trees and crops.

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

Pursuant to U.S. EPA guidelines, an area with air quality better than the NAAQS for a specific pollutant is designated as being in attainment for that pollutant. Any area not meeting the NAAQS for a specific pollutant is classified as nonattainment for that particular pollutant. Where there is a lack of data for the U.S. EPA to make a determination regarding attainment or nonattainment, the area is designated as unclassified and is treated as an attainment area until proven otherwise. Areas that were once designated as nonattainment but are currently meeting and

maintaining the NAAQS are designated as maintenance areas. States with nonattainment or maintenance areas are required to prepare plans, known as State Implementation Plans (SIPs), stating how they will attain or maintain NAAQS. SIPs are a compilation of new and previously approved plans, programs, district rules, state regulations and federal controls. States and local air quality management agencies prepare SIPs for approval by the U.S. EPA.

State

At the state level, CARB has also adopted air quality standards for California, known as the CAAQS pursuant to the California Clean Air Act (CCAA). The CAAQS are generally more stringent than the NAAQS and include air quality standards for all criteria pollutants listed under NAAQS, plus sulfates (SO₄), hydrogen sulfide (H₂S), vinyl chloride, and visibility-reducing particulate matter. The CCAA established California's air quality goals, planning mechanisms, regulatory strategies, and standards of progress aimed toward meeting and/or exceeding CCAA requirements for air quality. The CCAA requires attainment of CAAQS for criteria pollutants by the earliest practicable date. A summary of CAAQS is presented in Table 3-8.

Table 3-8. National and State Ambient Air Quality Standards

Pollutant	Averaging Time	California	National Standards ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
Ozone (O ₃) ⁶	1 Hour	0.09 ppm (180 µg/m ³)	—	Same as Primary Standard
	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	
Particulate Matter (PM ₁₀) ⁷	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m ³	—	
Fine Particulate Matter (PM _{2.5}) ⁷	24 Hour	—	35 µg/m ³	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m ³	12.0 µg/m ³	15 µg/m ³
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	—
	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	—
Nitrogen Dioxide (NO ₂) ⁸	1 Hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	—
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary Standard
Sulfur Dioxide (SO ₂) ⁹	1 Hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	—
	3 Hour	—	—	0.5 ppm (1300 µg/m ³)
	24 Hour	0.04 ppm (105 µg/m ³)	0.14 ppm (for certain areas) ⁸	—
	Annual Arithmetic Mean	—	0.030 ppm (for certain areas) ⁸	—

Pollutant	Averaging Time	California	National Standards ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
Lead ^{10,11}	30-Day Average	1.5 µg/m ³	—	—
	Calendar Quarter	—	1.5 µg/m ³ (for certain areas) ¹⁰	Same as Primary Standard
	Rolling 3-Month Average	—	0.15 µg/m ³	
Visibility Reducing Particles ¹²	8 Hour	See footnote 11	No National Standards	
Sulfates	24 Hour	25 µg/m ³	No National Standards	
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	No National Standards	
Vinyl Chloride ¹⁰	24 Hour	0.01 ppm (26 µg/m ³)	No National Standards	

Sources:

1. Table extracted from <https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf> in August 2022 with information dated May 4, 2016 (CARB 2016).

Notes:

- ¹ California standards for ozone, carbon monoxide, sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded.
- ² National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms per cubic meter (µg/m³) is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98% of the daily concentrations, averaged over three years, are equal to or less than the standard.
- ³ Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 Torr. Most measurements of air quality are to be corrected to a reference temperature of 25 °C and a reference pressure of 760 Torr; ppm in this table refers to parts per million (ppm) by volume, or micromoles of pollutant per mole of gas.
- ⁴ National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- ⁵ National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- ⁶ On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- ⁷ On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg /m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg /m³, as was the annual secondary standard of 15 µg /m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg /m³ were also retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- ⁸ To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

- ⁹ On June 2, 2010, a new 1-hour SO₂ standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- ¹⁰ The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- ¹¹ The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg /m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- ¹² In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.
- m³ cubic meter
 µg microgram
 µg/ m³ micrograms per cubic meter
 mg milligram
 mg/m³ milligrams per cubic meter
 ppb parts per billion
 ppm parts per million

Local

Operations within the City of Oxnard are subject to various rules and regulations of the VCAPCD. Table 3-9 lists some of the Rules that are applicable to the proposed project.

Table 3-9. Applicable VCAPCD Rules

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

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

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

Rule 55 requires control measures for fugitive dust from active operations, open storage piles, or disturbed surface areas and prohibits activities that would cause visible dust emissions of 20%. The rule also includes provision for

mitigating fugitive dust emissions (e.g., watering the Site during grading, properly covering truck beds when hauling soil or other material, installing dust control measures at each vehicle egress from the Site to public paved roads).

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

Additionally, City of Oxnard General Plan air quality goals and policies relevant to the proposed project are provided in Table 3-10.

Table 3-10. Applicable Goals and Policies for the City of Oxnard

SC-3.9	Promote Voluntary Incentive Programs	Promote voluntary participation in incentive programs to increase the use of solar photovoltaic systems in new and existing residential, commercial, institutional and public buildings, including continued participation in the Ventura County Regional Energy Alliance (VCREA).
SC-3.12	Encourage Natural Ventilation	Review and revise applicable planning and building policies and regulations to promote use of natural ventilation in new construction and major additions or remodeling consistent with Oxnard's temperate climate.
SC-4.1	Green Building Code Implementation	Implement the 2010 California Green Building Code (CALGreen) as may be amended and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.
CD-8.5	Impact Mitigation	Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.
ER-14.4	Emission Control Devices	Require all construction equipment to be maintained and tuned to meet appropriate EPA, CARB, and VCAPCD emissions requirements and when new emission control devices or operational modifications are found to be effective, such devices or operational modifications are required on construction equipment.
ER-14.5	Reducing Construction Impacts During Smog Season	Require that the construction period be lengthened to minimize the number of vehicles and equipment operating at the same time during smog season (May through October).
ER-14.6	Minimizing Dust and Air Emissions through Permitting Requirements	Continue to require mitigation measures as a condition of obtaining building or use permits to minimize dust and air emissions impacts from construction.
ER-14.7	Mitigation Monitoring	Ensure that projects with identified air quality impacts in their respective EIRs are subject to effective mitigation monitoring as required by AB 3180.
ER-14.10	Consultation with Ventura County Air Pollution Control District	Consult with VCAPCD during CEQA review for projects that require air quality impact analysis and ensure that the VCAPCD is on the distribution list for all CEQA documents.

ER-14.12	Use VCAPCD Air Quality Assessment Guidelines	Use the VCAPCD Air Quality Assessment Guidelines and recommended analytical tools for determining and mitigating project air quality impacts and related thresholds of significance for use in environmental documents. The City shall continue to cooperate with the VCAPCD in the review of development proposals.
CD-7.12	Urban Village Collocation with Schools	Promote the collocation of parks with school facilities for the purpose of enhancing available open space and recreation.
CD-7.13	Urban Village Trail and Open Connections	Include trails (pedestrian and bicycle) and open space areas, where feasible within urban village areas. These facilities shall create a network that links urban villages and other neighborhoods to each other.
CD-6.1	Agricultural Buffers	Require that agricultural land uses designated for long-term protection and production be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, fencing, berming, and windrows.

3.3.2 Impact Analysis

3.3.2.1 Methodology

Guidance found within the Ventura County Air Quality Assessment Guidelines (Guidelines), the 2017 City of Oxnard CEQA Guidelines and various sources referenced throughout this air quality analysis were used in the preparation of this document. A summary of the methodology used for emissions calculations is provided below.

Construction and Operational Emissions

Emissions from construction and operation activities were calculated using California Emissions Estimator Model (CalEEMod), which is widely accepted to provide a uniform platform to estimate potential emissions resulting from construction and operation activities of land use projects in California. The model takes user entered data and or default values to calculate emissions using preprogramed algorithms. The algorithms are designed to take information such as project size and length; vehicle types, operating hours, and trip lengths; and emissions mitigation criteria to calculate emissions of criteria pollutants and greenhouse gases. Default values based on school size (e.g., number of new students, building areas, parking area, project Site area) were used in CalEEMod to calculate construction and operation emissions of the proposed project. Detailed CalEEMod input values, including construction activities and calculated air emission results for the proposed project are included as Appendix B. Air emissions were compared to significance thresholds established by the VCAPCD to determine project impacts on air quality.

CO Analysis

The Ventura County Air Quality Assessment Guidelines prescribe that a carbon monoxide screening analysis be performed for nearby road intersections that are expected to operate at level of service (LOS) E or F. These guidelines recommend use of CALINE4, a line source dispersion model developed by the California Department of Transportation (Caltrans) and designed to predict pollutant concentrations affecting nearby receptors (e.g., residents, business workers, etc.) within 500 meters. To determine LOSs at nearby intersections a review of the traffic study prepared for this project (Stantec 2022b) was conducted. Per the traffic study, none of the analyzed intersections are anticipated to operate at LOS E or F, and, therefore, a CO analysis was not prepared.

3.3.2.2 Significance Thresholds

The following criteria for air quality are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

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

3.3.2.3 Project Impacts

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

The project Site is located at 3100 Rose Avenue in unincorporated County of Ventura.

To pursue SIP requirements and improvement of air quality in Ventura County, the VCAPCD has prepared the 2016 Air Quality Management Plan (AQMP). The AQMP presents a comprehensive list of pollution control strategies aimed at attaining Ventura County's federal 8-hour ozone standard (for which Ventura County is in nonattainment) as required by the CAAA and the VCAPCD's Triennial Assessment and Plan Update required by the California Clean Air Act of 1988. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG) and reflected in local general plans. Thus, a proposed project that is inconsistent with a local general plan is also inconsistent with the AQMP. A proposed project would be inconsistent with a general plan if it resulted in a land use re-designation, causing a general plan amendment and an increase in population beyond what is budgeted.

The proposed project Site is located in an unincorporated area within the Ventura County and the existing main campus is within the Oxnard region of influence. The proposed project is adjacent to residential and agricultural land to the North and a fully developed residential development to the west, agricultural land to the east, and commercial developments (car dealerships) to the south. The Ventura County General Plan land use designations for the project Site are agricultural land for the northern and southern campus expansion areas, and very low residential for the main campus. The main campus is designated as school land use in the City of Oxnard's 2030 General Plan. The proposed project would not induce population growth into the area either directly or indirectly. The student population would be part of the existing and projected growth for the City of Oxnard. In general, K-12 schools accommodate growth as a result of other land use decisions in the City such as the construction of new homes or the creation of a substantial number of new jobs that encourages new people to move into the area. No housing is proposed as a part of the proposed project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all the additional staff could be hired from the existing qualified applicant pool already residing within or near the District. However, if teachers or other staff are hired outside the District area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the existing local population. The proposed project includes educational facilities that would accommodate existing and projected student enrollment in the District and the requirement for local schools to service the City of Oxnard. The proposed project would not result in population growth above what is forecasted in the 2030 General Plan and the Ventura County General Plan and in turn the 2016 AQMP. However, the proposed project requires a general plan amendment to redesignate some of the property from agriculture to school land use. Therefore, once the proposed project's land use is redesignated from agricultural land to school land use, the proposed project would not be expected to conflict or obstruct implementation of the applicable 2016 AQMP and project impact would be less than significant.

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

Per CEQA, a project is cumulatively considerable if the incremental effects of the project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. CEQA also prescribes that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan (e.g., air quality attainment or maintenance plan) or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located (California Office of Administrative Law 2022). The applicable attainment plan in Ventura County is the 2016 AQMP. While the proposed project would not result in a population increase and its emissions would not be beyond what is projected in the AQMP, the proposed project requires a land use redesignation from agriculture to school land use. The redesignation would accommodate anticipated growth forecasted for the City of Oxnard.

To determine the extent to which a project will impact air quality in Ventura County, the VCAPCD has established emission significance thresholds. Since these thresholds are linked to the AQMP, an exceedance could render a proposed project as noncompliant with the AQMP and therefore as having a cumulatively considerable net increase. Since the proposed project would contribute emissions to the regional air during its construction and operation, the significance thresholds established by the VCAPCD were used to determine whether the proposed project would result in significant impacts.

Short-term Emissions. Short-term or construction emissions are typically generated by on-road (e.g., employee vehicles and vendor/delivery and water trucks) and off-road vehicles or equipment (e.g., backhoes, dozers, portable generators, and graders). Short-term emissions end once the construction phase is complete. The proposed project's construction phase consists of site preparation; grading; construction (e.g., classrooms, administrative offices; and supporting structures, soccer, football, and softball fields, and tracks), paving; and application of architectural coatings to classrooms and offices. Emissions from the construction phase result primarily from mobile on-road (e.g., workers vehicles, material, and equipment delivery trucks) and off-road sources (i.e., construction equipment). The construction equipment used for the proposed project would include air compressors, scrapers, excavators, forklifts, generator sets, pavers, rollers, rubber-tired dozers, backhoes, graders, paving equipment, and welders. CalEEMod was used to calculate emissions from construction and operation of the proposed project. Emissions, including detailed data entered into CalEEMod to calculate emissions are included as Appendix B. A summary of construction emissions is presented in Table 3-11.

Table 3-11. Project Construction Emissions of Criteria Pollutants (lb/day)

Project Phase	VOCs	NO _x	SO _x	PM ₁₀	PM _{2.5}
Construction Emissions 2023	1.08	19.31	37.16	0.06	8.34
Construction Emissions 2024	49.97	12.44	19.44	0.04	0.68
Threshold Significance	None	None	None	None	None
Significant?	No	No	No	No	No

Notes:

- CO carbon monoxide
- NO_x nitrogen oxides (nitrogen oxide and nitrogen dioxide)
- PM_{2.5} particulate matter less than 2.5 microns in diameter
- PM₁₀ particulate matter less than 10 microns in diameter
- SO_x sulfur dioxide
- tpy tons per year
- VOC volatile organic compound

VCAPCD does not have significance thresholds for construction emissions due to the fact that construction emissions occur only on a temporary basis and do not contribute to long-term air quality impacts. Thus, emissions

resulting from the proposed project would not be expected to have a significant impact on the environment and no mitigation measures would be required other than what is standard and recommended. To this effect, Mitigation Measure AQ-1 provided at the end of this Air Quality Section is provided to minimize fugitive dust emissions in compliance with the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations and to minimize VOCs and NO_x in accordance with VCAPCD recommendations for construction emissions exceeding 25 pounds per day for VOCs and NO_x.

Long-term Emissions. Long-term or operational emissions are emissions that result from activities conducted during the operation of a project (e.g., comfort heating, employee commute, student drop-off and pickup, and facility upkeep). Long-term impacts to air quality would be associated with emissions from equipment used during operation of the proposed project (e.g., commercial water heaters, space heaters, and lawn mowers) and from motor vehicles associated with school employees, student drop-off and pick-up, and vendors. Other activities that would contribute emissions during the operation of the proposed project include upkeep of structures (e.g., reapplication of architectural coatings and patching of paved surfaces). Detailed CalEEMod input parameters, used for calculating emissions, and emissions results are provided in Appendix B. Emissions resulting from operation of the proposed project are summarized in Table 3-12. Emissions resulting from the operation of the proposed project are below the thresholds of significance established by VCAPCD to support attainment of federal standards. Therefore, the proposed project would not be expected to violate any air quality standard or contribute substantially to an existing or projected air quality violation and would have less than significant impact on air quality.

Table 3-12. Project Operation Emissions of Criteria Pollutants (lb/day)

Project Phase	CO	VOCs	NO _x	SO _x	PM ₁₀	PM _{2.5}
Operation Emissions	1.71	2.11	6.26	0.02	2.16	0.59
Threshold of Significance	None	25	25	None	None	None
Significant?	No	No	No	No	No	No

Notes: CO carbon monoxide
 lb/day pounds per day
 NO_x oxides of nitrogen (nitric oxide and nitrogen dioxide)
 PM₁₀ respirable particulate matter less than 10 microns in diameter
 PM_{2.5} respirable particulate matter less than 2.5 microns in diameter
 SO_x oxides of sulfur (sulfur dioxide and sulfur trioxide)
 VOC volatile organic compounds

As identified in Table 3-12, the proposed project would not violate an air quality standard, nor would it contribute substantially to an existing or projected air quality violation. Therefore, project impact would be less than significant.

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

Would the project expose sensitive receptors to substantial pollutant concentrations?

The project Site is adjacent to agricultural land and residential units to the north; agricultural land to the east; commercial land (car dealerships) to the south; and residential units to the west. The proposed project is a public school that qualifies as a sensitive receptor (i.e., a facility serving populations likely to suffer adverse health effects from pollution, such as children and the elderly). The location of the project Site is not expected to expose students to sources of substantial pollutant concentrations (e.g., industrial facilities emitting odorous or hazardous substances). Adjacent agricultural land use is consistent with the City of Oxnard and Ventura County General Plan,

and agricultural operations are not expected to expose receptors (e.g., school staff and students to substantial pollutant concentrations). In accordance with Goal CD-6 of the Oxnard General Plan, the proposed project includes a buffer between agricultural fields and classrooms in the form of soccer, baseball, softball, and football fields, as well as tennis courts and parking lots.

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

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

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

3.3.2.4 Cumulative Impacts

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

3.3.2.5 Mitigation Measures

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

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

- All soil excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed soil areas. Watering shall be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations.

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

3.3.2.6 Level of Impact After Mitigation

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

3.4 BIOLOGICAL RESOURCES

This section describes existing biological resources within the proposed project Site and provides an assessment of potential impacts to biological resources from implementation of the proposed project. As noted in the Initial Study (Appendix A), the proposed project would have no impacts associated with riparian habitat or other sensitive natural communities, protected wetlands, and an adopted Habitat Conservation Plan/Natural Community Conservation Plan and these impacts are not discussed in detail in the EIR. For identified potential impacts discussed below, mitigation measures pursuant to the Federal Endangered Species Act (ESA), California ESA, and CEQA have been prescribed as applicable.

3.4.1 Environmental Setting

3.4.1.1 Existing Conditions

The project Site currently consists of approximately 20.2-acres of existing main campus school facility, 10-acres of active agricultural lands to the north of the campus, and 11.1-acres of agricultural lands to the south of the campus. The project Site is located within an urban environment, adjacent to agricultural land to the north and east, Rose Avenue and residential land to the west, and commercial land in the form of car dealerships to the south.

A general biological survey conducted on September 22, 2021 verified that the project Site is currently used as an active middle school campus and cultivation of row crops; no native vegetation communities occur within the Site boundary. During the biological survey, a total of 53 plant species (7 native and 46 non-native) and 15 native wildlife species were observed on-Site. A stand of mature oak trees is present in the eastern portion of the existing main campus (see Figure 2-2); the proposed project would avoid impacts to this stand of oak trees, as shown in Figure 2-3. Trees, including eucalyptus trees, were also observed along the southern boundary of the existing RDV campus. Other native plants such as big saltbush (*Atriplex lentiformis* – observed at the boundary of the southern campus expansion area and Rose Avenue) and jimsonweed (*Datura wrightii* – observed behind an existing building on the school campus) observed on-Site occur mostly along parcel boundaries where there is less human disturbance. The native black sage (*Salvia mellifera*) is used in some ornamental planters on the existing RDV campus Site. Wildlife observed throughout all portions of the project Site included species such as dark-eyed junco (*Junco hyemalis*), Cassin's kingbird (*Tyrannus vociferans*), western meadowlark (*Sturnella neglecta*), and California ground squirrel (*Spermophilus beecheyi*). No jurisdictional waters of the U.S. and/or wetlands were observed on the project Site.

3.4.1.2 Regulatory Setting

Federal

Federal Endangered Species Act (ESA)

Title 16, United States Code, §1531 et seq., and Title 50, Code of Federal Regulations, part 17.1 et seq., designate and provide for the protection of threatened or endangered plant and animal species and their critical habitat. The ESA applies to federally-listed threatened or endangered species and their habitat, as well as designated critical habitat. The administering agency is the United States Fish and Wildlife Service (USFWS). Federal agencies that permit, license, fund, or other authorize a project activity with potential impacts to these resources must consult with the USFWS to ensure that actions would not jeopardize any listed species or adversely affect critical habitat.

Federal Migratory Bird Treaty Act (MBTA)

Title 16, United States Code, §703 et seq., protects native bird species and their nests. All migratory birds and their parts (i.e., eggs, nests, and feathers) are fully protected under the MBTA. The MBTA prohibits the take, possession, import, export, transport, selling, purchase, barter, or offering for sale of any migratory bird or its parts, unless

authorized under a valid permit. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (Title 50, Code of Federal Regulations, §10.13).

State

California ESA

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

Local

Local agencies, such as the City of Oxnard Planning Department, aid in the protection and preservation of special-status species and other sensitive natural resources in exercising land use controls. The Background Report of the City of Oxnard’s 2030 General Plan Program EIR (City of Oxnard 2009) combined with other General Plan Elements and the Oxnard CEQA Guidelines, strive to achieve this control in defining certain goals and policies for the conservation of sensitive natural resources. The relevant goal and policies from the City of Oxnard’s 2030 General Plan Environmental Resources Chapter (Chapter 5) are listed below.

Goal ER-1 Protection of natural and cultural resources, agriculture and open spaces is well integrated with the built environment and human activities and achieves a symbiotic, mutually beneficial, sustainable relationship.

Policy ER-1.1 Protect Oxnard’s natural and cultural resources. Protect the City’s natural resource areas, fish and wildlife habitat, scenic areas, parks, and cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible.

Policy ER-1.2 Protect surrounding agriculture and open space. Protect open space and agricultural uses around Oxnard through continued adherence to the Guidelines for Orderly Development, Ventura County Greenbelt programs, the SOAR, and other programs or policies that may subsequently be adopted such as the SB 375 Sustainable Communities Strategy.

3.4.2 Impact Analysis

3.4.2.1 Methodology

The analysis contained within this EIR is based on a review of pertinent background information for the project Site, including the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) data, U.S. Geological Survey (USGS) topographic maps, a project-specific biological Site visit conducted on September 22, 2021, and the associated Initial Study (Appendix A) that was completed prior to initiation of this EIR. Special-status species are defined herein as plant and wildlife holding a status of sensitive, threatened, endangered, rare, or candidate status as defined by CDFW, USFWS, or the Bureau of Land Management. The special-status species presented in Table 3-13 are those with any chance of occurring within or adjacent to the project Site based on regional occurrence and habitat present on the project Site (CDFW 2022). The biological Site visit focused on assessing the project Site for potential occurrence of special-status species identified during the CNDDDB database query and habitats that could support those species. Due to the current land use of the Site and plant list established during the general biological survey, there is no potential for special-status plants to occur on the project Site.

Table 3-13. Special-Status Wildlife Species with Potential to Occur

Common Name	Scientific Name	Federal Status / State Status	Other Status	Potential to Occur
Birds				
burrowing owl	<i>Athene cunicularia</i>	- / -	S, SSC, BCC	Low – unlikely to occur at burrows near recreational areas or breed in Ventura County close to the coast.
Ferruginous hawk	<i>Buteo regalis</i>	- / -	WL, BCC	Low – lack of suitable habitat and prey species on Site.
white-tailed kite	<i>Elanus leucurus</i>	- / -	S, FP	Low – lack of suitable habitat and prey species on Site.
California horned lark	<i>Eremophila alpestris actia</i>	- / -	WL	Low – lack of suitable habitat and prey species on Site.
American peregrine falcon	<i>Falco peregrinus anatum</i>	FD / SD	FP, BCC	Low – lack of suitable habitat and prey species on Site.
Insects				
Crotch bumble bee	<i>Bombus crotchii</i>	- / CE	-	Low – lack of suitable habitat and nectar sources on Site.
Mammals				
pallid bat	<i>Antrozous pallidus</i>	- / -	S, SSC	Low – lack of suitable roosting habitat on Site; not highly tolerant of urban areas.
Western mastiff bat	<i>Eumops perotis californicus</i>	- / -	S, SSC	Low – lack of suitable habitat on Site; not highly tolerant of urban areas.

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

BCC USFWS Birds of Conservation Concern

CE Candidate Endangered

FD Federally Delisted

FP CDFW Fully Protected

S BLM Sensitive Species

SD State Delisted

SSC CDFW Species of Special Concern

WL CDFW Watch List

During preparation of the Initial Study, it was determined that the proposed project could potentially result in significant but mitigatable impacts associated with three of the criteria used in determining impact significance consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. These identified impacts relate to special-status species, nesting bird species, and a local policy protecting biological resources.

3.4.2.2 Significance Thresholds

The thresholds for biological resource impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?*

- *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
- *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

3.4.2.3 Project Impacts

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

The project Site is located within an urban area in unincorporated County of Ventura and is not located within or directly adjacent to any known or mapped wildlife corridors or nursery sites. Accordingly, the potential for candidate, sensitive, or special-status species or habitats is low within City limits. The project Site is currently used as an existing middle school campus and for cultivation of row crops (red raspberry). A query of the CDFW CNDDDB was conducted to determine the known locations of any special-status species or habitats (sensitive, threatened, endangered, rare, or candidate species) within and surrounding the project Site (CDFW 2022). This included Oxnard, located within the Oxnard quadrangle, and the six adjacent quadrangles (Table 3-13). The wildlife species presented in Table 3-13 are those with any chance of potentially occurring within or adjacent to the project Site based on regional occurrence and habitat present on Site.

Due to the active use of the project Site as a middle school campus and agricultural land, there is no potential for special-status plants to occur on Site and it is unlikely that any special-status wildlife species would occur. The agricultural land in the northern campus and southern campus expansion areas is often covered with shade covers, which reduces the potential for ferruginous hawk (*Buteo regalis*), white-tailed kite (*Elanus leucurus*), and American peregrine falcon (*Falco peregrinus anatum*) to find prey on Site. Therefore, the potential for these species to occur on Site is low. Due to the probable use of pest and weed control methods associated with active agricultural land and the presence of shade covers, seeds, insects, and desirable habitat for California horned lark (*Elanus leucurus*) is minimal, therefore the potential for horned lark to occur on Site is low. The western mastiff bat (*Eumops perotis californicus*) and pallid bat (*Antrozous pallidus*) could potentially roost in school buildings or adjacent farm buildings, or in the mature trees on Site; however, the potential for roosting to occur on Site is low, as this is not the preferred roosting habitat of these species, and these bat species are not highly tolerant of urban areas. Crotch bumble bee (*Bombus crotchii*) could potentially nest underground in abandoned small mammal burrows, which were observed at the project Site. However, the project Site and adjacent areas lack potential nectar sources, such as plants in the *Medicago*, *Phacelia*, *Clarkia*, and *Eriogonum* genera. Therefore, potential for crotch bumble bee to occur on Site is low.

Agricultural land can be considered suitable habitat for burrowing owl (*Athene cunicularia*), dependent upon the presence of burrowing mammals or suitable surrogate burrows. The nearest CNDDDB burrowing owl occurrence is approximately 3 miles from the project Site at the Camarillo Airport from 2009 and 2010. These observations were likely wintering owls since burrowing owls rarely breed in coastal areas, including Ventura County. California ground squirrels, burrows, and potential burrow surrogates (e.g., pipes) were observed at the project Site during the general biological survey, including burrows observed along the fenceline between the school recreational areas and the agricultural lands. Burrowing owls are generally not tolerant of recreational areas and urban sites subject to human disturbance (Moroni et al. 2017); therefore, the potential for burrowing owl to occur on the project Site is low. While the potential for burrowing owl to occur on-Site is low, burrowing owl may attempt to colonize an area that would be impacted by the proposed project if suitable burrow habitat becomes available prior to commencement of construction activities. Therefore, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb burrowing owl, if present.

Aside from the species presented in Table 3-13, while unlikely, special-status bird species that do not necessarily have documented regional occurrences near to the project Site could occur. These species would be considered transients and would not be expected to have long term use of the project Site.

The stand of mature oak trees in the eastern portion of the existing main campus and other vegetation and structures within and adjacent to the project Site have the potential to serve as habitat for nesting birds. One large inactive stick nest was observed in a eucalyptus tree at the southern boundary of the existing main campus during the general biological survey. The general biological survey was conducted outside the nesting season, which is why this nest was observed to be inactive. The proposed project would avoid impacts to the stand of mature oak trees in the eastern portion of the existing main campus; however, the proposed project may require the removal of other trees on Site as part of the facility updates and campus expansion. Therefore, direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds, including special-status bird species, if present. With implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3, proposed project impacts to special-status species would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 1 to September 15.

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

The project Site is located within a developed urban environment. The project Site is not located within, or directly adjacent to, any known or mapped wildlife corridors or nursery sites; the Santa Clara River is the nearest established Habitat Connectivity and Wildlife Corridor and is approximately 1.5 miles northwest of the project Site (Ventura County 2019). Developed land separates the Santa Clara River from the project Site so wildlife using the river for migration would not have a direct connection to the Site. The stand of mature oak trees in the eastern portion of the existing main campus, and other vegetation and structures within and adjacent to the Site have the potential to serve as habitat for nesting birds. During the general biological survey, one large inactive stick nest was observed in a eucalyptus tree at the southern boundary of the existing main campus. The proposed project would avoid impacts to the stand of mature oak trees in the eastern portion of the existing main campus; however, the proposed project may require the removal of other trees on Site as part of the facility updates and campus expansion. Therefore, direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds if present. With implementation of Mitigation Measure BIO-1, proposed project impacts to the movement of any native resident or migratory wildlife species, established native resident or migratory wildlife corridors, or the use of native wildlife nursery sites would be reduced to less than significant. Mitigation Measure BIO-1 would not be required for activities conducted outside of the bird nesting season. The bird nesting season is defined as February 1 to September 15.

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

The proposed project includes facility updates and expansion that may require the removal of trees on the Site. However, the proposed project would avoid impacts to the mature oak trees present in the eastern portion of the existing main campus. The City of Oxnard does not have a tree preservation policy or ordinance; however, the City's urban landscape is considered an important aesthetic resource (City of Oxnard 2006). Additionally, local agencies, such as the City of Oxnard Planning Department, aid in the protection and preservation of sensitive natural resources by exercising land use controls. The Background Report of the City of Oxnard's 2030 General Plan Program EIR (City of Oxnard 2009) combined with other General Plan Elements and the 2017 City of Oxnard CEQA Guidelines, strive to achieve this control in defining certain goals and policies for the conservation of sensitive natural resources. Any tree removal activities performed as part of the proposed project will be performed in compliance with City requirements, including the City's Landscape Standards (City of Oxnard 1988). Therefore, the

removal of trees would not conflict with any local policies or ordinances protecting biological resources, and no impact would result.

3.4.2.4 Cumulative Impacts

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

3.4.2.5 Mitigation Measures

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

BIO-1: Construction activities involving vegetation removal or ground disturbance shall be conducted between September 16 and January 31, outside the typical nesting season for birds in the region. If vegetation removal or ground disturbance must occur during the typical nesting season (February 1–September 15), a qualified biologist shall conduct a preconstruction nesting bird survey for active nests for areas that will be subject to ground disturbance, vegetation removal, and/or construction noise. The survey shall be required within 7 days of commencement of construction activities if they occur in the bird nesting season. The survey shall occur within the project Site and a 250-foot buffer area around the project Site, access permitting, which will include any adjacent trees. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. If birds are found to be actively nesting within the project Site or within 250 feet of the work area, an appropriate exclusionary buffer around the active nest shall be established by the qualified biologist. The buffer distance will be determined based on the nesting species. No construction activities would be allowed within the buffer until the birds have fledged from the nest or until the qualified biologist determines that the nest is inactive. At a minimum, a qualified biologist would visit an active nest weekly to determine the status of the nest. Only when the nest becomes inactive (nestlings have fledged) will the buffer and biological monitoring no longer be needed. The results of the preconstruction nesting bird survey and any required monitoring shall be submitted in a letter report to the City of Oxnard.

BIO-2: A preconstruction survey for burrows and burrowing owl shall be conducted by a qualified biologist prior to the use of heavy machinery and/or ground disturbance or removal of vegetation associated with construction activities. The survey shall be required within 5 days prior to the commencement of construction activities and shall occur within the project Site and a 150-foot buffer area around the project Site, access permitting. The burrowing owl preconstruction survey shall be performed in the early morning or late afternoon in accordance with the guidelines described in the *CDFW Staff Report on Burrowing Owl Mitigation* (CDFW 2012). If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. Should an occupied burrow and/or occupied burrow surrogate (identified by the presence of sign [e.g., whitewash, pellets, feathers, etc.] or actual observation of a burrowing owl individual) be identified on Site or within the 150-foot project Site buffer, no construction work can occur, and the CDFW shall be contacted immediately to develop and implement a mitigation plan to protect burrowing owls. The burrowing owl survey can be conducted in conjunction with the nesting bird survey, if timing is appropriate.

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

3.4.2.6 Level of Impact After Mitigation

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

3.5 CULTURAL RESOURCES

This section describes existing cultural resources within the proposed project Site and provides an assessment of potential impacts to cultural resources from implementation of the proposed project. This section discusses cultural resources within the project Site and surrounding area, evaluates potential project-related impacts on those resources, and provides mitigation measures, as applicable. Cultural resources are defined as buildings, sites, structures, districts, and or objects that have historical, architectural, archaeological, cultural, or scientific significance. Tribal cultural resources are defined as a Site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe.

This analysis was prepared based on the Phase I Negative Results Cultural Resource Report (Tetra Tech 2022a) study prepared and conducted for the proposed project. In accordance with the CEQA, Tetra Tech conducted the cultural resource study to determine whether the proposed project will result in a substantial adverse change in the significance of an archaeological or historical resource (Sections 21083 and 21084 et seq of the California Public Resources Code; under the California Code of Regulations, Title 14, Chapter 11.5, §15064.5. The study included a record and literature search, California Native American Heritage Commission (NAHC) sacred lands file (SLF) search, and phase I pedestrian field survey. The results of this study are provided in this section.

3.5.1 Environmental Setting

3.5.1.1 Existing Conditions

As discussed in Section 2.2, the proposed project includes the existing campus (20.2-acre main campus) and active agricultural (10 acres) to the north of the main campus buildings. The proposed project would add approximately 11.1-acres to the south (currently agricultural) that the District proposes to develop with new educational and support facilities, resulting in an approximately enhanced 41.3-acre campus (project Site). The project Site is generally surrounded by agricultural lands and residential uses to the north, agricultural lands to the east, commercial uses (car dealerships) to the south, and residential and agricultural uses to the west. The elevation at the project Site is approximately 92 feet above mean average sea level (amsl). The project Site is situated on the Oxnard Plain within the Transverse Range Geomorphic Province. Sediments within the project Site consist of Quaternary alluvial deposits of sand, loam, gravels, and clay that are Holocene in age (recent to 10,000 years old). Soils within the project Site consist of Anacapa sandy loam to loam up to 60 inches in depth, and Camarillo Loam of loam to fine sand up to 80 inches in depth, and Pico sandy loam sandy loam to loam to gravelly loam up to 60 inches in depth (USDA-NRCS 2022). Due to modern development, the project Site may contain fill soils at various unknown depth. Vegetation within the project Site consists of landscaping and nonnative species, in addition to mulberry trees and agricultural fields of celery.

Cultural Context

The prehistory of the central California coastal region has been generally summarized here with approximate dates as follows: the Paleocoastal Tradition (12,000 to 8,000 years before present [BP]), the Early Period (also termed Milling Stone Horizon) (8,000 to 4,000 BP), the Middle Period (4,000 BP to 850 BP), the Middle to Late Transition Period (850 to 700 BP), and the Late Period (700 BP to European historic contact or missionization). Each period is characterized by different and overlapping technology and subsistence practices and is summarized here. The Paleocoastal Tradition is characterized by large, fluted points, habitation localities near bay shores and estuaries with a subsistence economy that included both marine and terrestrial species. Coastal and inland sites dating to this period are few. The Early Period is characterized by coastal and inland settlements on knolls and near permanent water sources with a focus on plant resources and terrestrial and marine (shellfish) resources. Artifacts such as large flake tools, core tools, an abundance of manos metates, handstones, and Olivella shell beads appear during this time. The Middle Period is characterized by technological developments (e.g., mortar and pestle, bow and arrow, plank canoe/tomol), an increased economic complexity (e.g., shell bead production), coastal and inland

habitation in large villages and smaller logistic camp type settlements, and the exploitation of large pelagic fish and acorns. The Late to Middle transition is characterized by the introduction of political and social cultural complexity (e.g., bead currency, specialization in crafts, extensive trade networks, etc.), increase of inland settlements and terrestrial resources. The Late Period is punctuated by the Medieval Climatic Anomaly, an approximate 300-year period of adverse environmental conditions such as a warmer climate and droughts. Artifact types such as well-made pestles and mortars, flaked tools, concave base projectile points, and circular shell fishhooks are present during this period. The Late Period is attributed to the Chumash culture and is characterized by an increase in population, a maritime and terrestrial resource economy.

The earliest archaeological evidence for prehistoric habitation within the Oxnard Plain occurs during 5000 to 3200 BP, with most sites dating to around 3200 to 800 BP and to European contact. Habitation sites along the Oxnard Plain were advantageously positioned to facilitate access to travel routes and interactions between islands and inland sites, and areas that provided coastal marine, estuarine, and terrestrial resources (Perry and Delaney-Rivera 2011). People traveled between islands and inland sites via the plank canoe or tomol. Archaeological research suggest archaeological sites are potentially covered by alluvial deposits, with some possibly impacted by coastal erosion and rising sea levels. By the end of the Late Period, permanent prehistoric settlements on the Oxnard Plain were primarily located along the coastal perimeter.

The project Site is within the ancestral territory of the Chumash, a group that occupied the region from San Luis Obispo to Malibu Canyon on the coast, inland to western San Joaquin Valley, and the Santa Barbara Channel Islands. The Chumash territories are historically subdivided by distinct dialects. The project Site is within the ethnographic and historic territory of the southernmost Chumash group, the Ventureño. They occupied most of current day Ventura County, and a portion of northern Los Angeles County. Of the California Native American ethnographic groups, the Chumash were one of the most populous societies of hunter-gatherers-fishers in southern California. Historic contact between the Chumash and European immigrants and missionization took a devastating toll on the indigenous population. Also see Section 3.17.1.

The Spanish Mission Period—between 1769 and 1821—designates the time when the Spanish established missions along the California coast (Castillo 1978). The first recorded contact between California natives and Europeans occurred in 1542, when the Juan Rodriguez Cabrillo expedition traveled along the west coast of California (Castillo 1978). Between 1769 and 1833, the Spanish founded 21 missions from San Diego north to the San Francisco Bay area (Presidio). Spanish Franciscan mission erected in Chumash territory include San Luis Obispo (c. 1772), San Buenaventura (c. 1782), Santa Barbara (1786), La Purisima Concepcion (c. 1787), and Santa Ynez (c. 1804) (Grant 1978:505). During the Spanish Mission Period in the 1770s, many of the local Chumash population was indoctrinated into the mission system and were baptized as neophytes. The baptized neophytes provided most the labor for mission construction, maintenance, and agricultural activities.

The period from 1821 to 1848 is referred to as the Mexican Rancho Period. In 1821, Mexico gained independence from Spain, and the secularization of the Missions was completed in 1834. It was during this period that large tracts of land called ranchos were granted by the various Mexican governors of Alta California, usually to individuals who had worked in the service of the Mexican government. By 1846, present day Ventura County had been divided into 19 large ranchos with the primary product being cattle and, to a lesser extent, sheep. The former 44,883-acre Rancho el Rio de Santa Clara o La Colonia extended across much of the Oxnard Plain.

The American Period is from 1849 to present and is marked following the end of hostilities between Mexico and the United States in January 1847. The United States officially obtained California from Mexico through the Treaty of Guadalupe Hidalgo on February 2, 1848. In 1850, California was accepted into the Union of the United States, primarily due to the population increase created by the Gold Rush of 1849. In Ventura County, the cattle market peaked between 1848 to 1856, which generated considerable wealth for many of the Spanish and Mexican rancho families. By the 1870s, most of the rancho lands were in the hands of Anglos who transformed the county. The cattle industry declined and was rapidly replaced by agriculture and an increasing interest in oil exploration and production.

The project Site is within the fertile Oxnard Plain and many settlers were attracted to the agricultural possibilities of the land. By the late 1800s, several farms in Ventura County were growing agricultural crops such as corn, barley, flake, wheat, lima beans, and strawberries. By the turn of the century, beets became the primary crop of the region. The city of Oxnard was incorporated in 1903, wherein agricultural crops began to dominate the landscape and produced mostly sugar beets among other resources. Most of the agricultural land within the Oxnard Plain has been replaced by commercial and industrial use and residential subdivisions. Based on the review of historic aerials, the RDV and residential property (located in the southern campus expansion area of the project Site) were built sometime between 1947 and 1967. RDV was built in 1961 (RSD 2022). A residence has been located on the southern campus expansion area since approximately 1959.

Record Search

Identification efforts for this inventory included review of existing Site records, previously conducted surveys in the area, historic maps and aerials, and homestead land patents. The record search study area includes the project 41.3-acre project Site and a 0.5-mile radius around the project Site.

On November 9, 2021, a literature and records search was conducted of the cultural resource site and project file collection at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System, at the California State University, Fullerton, California. As part of this record search, the SCCIC database of survey reports and overviews as well as documented cultural resources, cultural landscapes, and ethnic resources was consulted. Additionally, the search included a review of the following publications and lists: California Office of Historic Preservation (OHP) Historic Properties Directory/National Register of Historic Properties, OHP Archaeological Determinations of Eligibility, California Inventory of Historical Resources/California Register of Historic Resources, California Historical Landmarks, ethnographic information, historical literature, and historical maps.

The records search revealed a total of three previous cultural resources investigations overlap with the project Site. No previously recorded cultural resources were identified within the project Site. One previously recorded built environment resource (P-15-150007: the Doud House) was identified within 0.5 mile of the project Site. No eligible or listed California Register of Historical Resources were identified within the project Site. A search of federal land patents through the Bureau of Land Management's General Land Office Records website did not identify any land patents for the project Site. Based on historic maps and aerial imagery review, the project Site was used as agricultural land (cultivated fields: crops and orchards) since 1927, a residential building is present within the southwest portion of the Project site by 1957, and in 1967 the RDV is present within the central portion of the project Site. By 1985, no changes occur except all the orchards have been removed and replaced with cultivated agricultural fields (row crops), and from 1987 to 2016 the project Site appears in its current configuration.

Native American Heritage Commission Sacred Lands File Search and Tribal Outreach

An important part of CEQA is consultation with the NAHC and the local Native American community. The NAHC was contacted to request a Sacred Lands file search. The NAHC replied on October 13, 2021 that the SLF results were negative for the project Site. The NAHC provided a list of local Native American contacts that may have knowledge of the region. See Section 3.17 Tribal Cultural Resources for Native American coordination and consultation discussion.

Phase I Archaeological Survey and Extended Phase I

On April 11, 2022, Tetra Tech's qualified staff archaeologists surveyed the project Site to identify cultural resources (Tetra Tech 2022a). The survey was conducted when school was not in session and no students were present. The project Site currently consists of RDV's various school buildings, paved areas (parking, sidewalks, courts, road), landscaped areas, existing baseball fields, a recently constructed track and flag football field, and areas under construction with the school property; and unpaved storage yards (farm equipment and vehicle parking), a residential single-family home with associated garage and tool shed, a large storage container, and active

agricultural fields of organic celery (row crops) within the southwestern portion of the project Site. The northeastern portion of the project Site consist of an active agricultural field of organic celery (row crops). Due to these various features within the project Site, ground surface visibility ranged from poor to good (from 25 to 60%). Built areas with no ground surface visibility (i.e., buildings and paved areas) were not surveyed; and areas under active construction were not intensively surveyed due to safety reasons. All areas with exposed ground surface were intensively surveyed. The survey was conducted using standard archaeological procedures and techniques. Continuous parallel transects spaced 10 to 15 meters apart were walked in a north to south and east to west direction, dependent upon landscape, and within the pathways with exposed ground surface between the active rows of celery. A total of 30.6 acres were surveyed, and no cultural resources were observed. The project Site has been heavily disturbed by past land use such as agricultural fields (row crops and orchards), school infrastructure (i.e., buildings, sewer, water, fields), and active construction activity. Due to this development across the project Site, subsurface ground disturbance varies and is estimated at approximately 24 to 36 inches below ground surface (agricultural zone: discing, orchard planting and removal; and utilities). Very little modern refuse was noted throughout the project Site (e.g., metal, plastic fragments, and beverage containers of glass, aluminum, and plastic). No artifacts or features were identified during the field survey.

Based on the literature review and field survey, two historic era-built environment resources: the RDV buildings/infrastructure and a residential building are located within the project Site. These resources were built sometime between 1947 and 1967 and are historic in age. A built environment survey and report was not conducted for the project Site and is addressed in Section 3.5.2.

Potential for Unknown Buried Cultural Resources

Several factors contribute to the cultural resource sensitivity of an area. Primarily, these factors include prehistoric and historic natural setting, historic and modern disturbances, and density and patterning of recorded archaeological resources. The potential for buried archaeological resources in a region is also affected by age of landforms and landscape evolution and post depositional processes such as erosion, subsidence, deposition, earthquakes, colluvial and alluvial processes, and historic development. In addition, the natural setting and available resources of a region provides information regarding areas that would have been desirable for human settlement or activity (e.g., hunting, collecting, farming) such as areas located near lakeshores, marshes/sloughs, oceans, rivers and streams, or an oak woodland.

It is generally accepted that human occupation of the region did not occur until approximately 13,000 to 10,000 years ago. Therefore, landforms that are Pleistocene (1.8 million years to 11,800 years) in age or older are less likely to contain subsurface archaeological material. Conversely, intact Holocene (10,500 cal BP to present) age deposits are considered more likely to contain archaeological. Alluvial sediments within the project Site are Holocene in age (recent to 10,000 years old). Currently, archaeological evidence suggests Middle to Late period permanent precontact habitation sites within the Oxnard Plain were strategically located along its perimeter. This location provided access to travel routes, facilitated interactions between island and inland populations, and coastal marine, estuarine, and terrestrial resources. Archaeological research suggests there is a potential for buried archaeological material under Holocene alluvium, however, permanent prehistoric settlements were mostly located along the coastal perimeter, near rivers and creeks, and estuaries that may have been impacted by changes in sea level.

The combined cultural resource literature (e.g., prehistoric and historic context, historic maps, and aerials), record search, and NAHC SLF search did not identify any existing archaeological resources within the project Site or a 0.5-mile buffer. Based on the natural setting, NAHC SLF results, SCCIC records search results and literature review, landform and distance to water, and previous disturbance to native soils across the project Site (i.e., removal of orchards, agricultural tilling and ripping, RDV infrastructure), the project Site is assessed as having an overall low to low-moderate sensitivity for buried significant archaeological pre-contact (or tribal) cultural resources within undisturbed subsurface soils. A low sensitivity is expected for significant historic era archaeological resources within undisturbed subsurface deposits.

3.5.1.2 Regulatory Setting

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

State

California Environmental Quality Act

CEQA (Section 21084.1) requires a lead agency determine whether a project could have a substantial adverse change in the significance of a historical resource or tribal cultural resources (Section 21084.2).

Under CEQA (Section 15064.5 (a)), a historical resource (e.g., building, structure, or archaeological resource) shall include resource that is listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR), or a resource listed in a local register or landmark, identified as significant in a historical resource survey (meeting the requirements of Section 5024.1(g) of the Public Resources Code [PRC]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (Section 15064.5[a][3]). Under the California Code of Regulations, Title 14, Chapter 11.5, properties listed on or formally determined to be eligible for listing in the National Register of Historic Places are automatically listed in the CRHR. CEQA Statute Section 21074(a)(1)(b) and Guidelines Section 15064.5(a)(2) indicate that listed in or eligible for listing in a local register (defined in PRC 2020.1(k)) are automatically eligible for listing in the CRHR. A resource is generally considered to be historically significant under CEQA if the resource is at least 45 years old and meets the following criteria for listing in the CRHR (PRC SS5024.1, Title 14, Code of Regulations, Section 4852):

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

Under PRC Section 21074, (a) tribal cultural resources are:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:
 - (A) Included or determined to be eligible for the inclusion in the CRHR; or
 - (B) Included in a local register of historical resources as defined by subdivision (k) of Section 5020.1 (designated or recognized historically significant by a local government pursuant to local ordinances or resolution).
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
 - (A) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

- (B) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Assembly Bill 52

Under CEQA, Assembly Bill (AB) 52 (Section 5, 21080.3.1) requires a lead agency to consult with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project if:

1. A Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe; and
2. The California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.

Consultations may include a brief description of the proposed project and its location, the lead agency contact information, the type of environmental review necessary, the significance of tribal cultural resources, and the significance of the project’s impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe. Consultation, if requested, must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.

California Health and Safety Code, Section 7050.5

Section 7050.5 (a) states that it is a misdemeanor (except as provided in Section 5097.99, see below) to knowingly mutilate or disinter, wantonly disturb, or willfully remove any human remains in or from any location other than a dedicated cemetery without the authority of law. The provisions of this subdivision shall not apply to any person carrying out an agreement developed pursuant to subdivision (l) of Section 5097.94 of the Public Resources Code or to any person authorized to implement Section 5097.98 of the Public Resources Code. Section 7050.5 (b) requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner of the County (in which the human remains are discovered) can determine whether the remains are subject to the coroner’s authority. The coroner shall make their determination within two working days from the time the person responsible for the excavation, or that person’s authorized representative, notifies the coroner of the discovery of human remains. Per Section 7050.5 (c), if the coroner determines the remains are not subject to their authority and recognizes the remains to be Native American or has reason to believe they are those of a Native American, the coroner shall contact, by telephone within 24 hours, the California Native American Heritage Commission (NAHC).

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The Act requires that upon discovery of human remains, construction or excavation activity cease and that the county coroner be notified. If the remains are Native American, the coroner must notify the NAHC. The NAHC will then identify and notify a most likely descendant. The Act stipulates the procedures the most likely descendant may follow for treating or disposing of the remains and associated grave goods.

California Public Resources Code, Section 5097.5 and 5097.99

Section 5097.5 of the PRC states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological, or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

As used in this section, “public lands” means lands owned by, or under the jurisdiction of the state or any city, county, district, authority, public corporation, or any agency thereof.

Section 5097.99 of the Code states:

- (a) No person shall obtain or possess any Native American artifacts or human remains which are taken from a Native American grave or cairn on or after January 1, 1984, except as otherwise provided by law or in accordance with an agreement reached pursuant to subdivision (l) of Section 5097.94 or pursuant to Section 5097.98.
- (b) Any person who knowingly or willfully obtains or possesses any Native American artifacts or human remains which are taken from a Native American grave or cairn after January 1, 1988, except as otherwise provided by law or in accordance with an agreement reached pursuant to subdivision (l) of Section 5097.94 or pursuant to Section 5097.98, is guilty of a felony which is punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code.
- (c) Any person who removes, without authority of law, any Native American artifacts or human remains from a Native American grave or cairn with an intent to sell or dissect or with malice or wantonness is guilty of a felony which is punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code.

California Penal Code Section 622.5

California Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

Senate Bill 18

California Senate Bill (SB) 18 (Burton, Chapter 905, Statutes of 2004: SB18), implemented March 1, 2005, requires local city and county governments to notify and consult with federally and non-federally recognized California Native American tribe(s) about proposed local land use planning decisions for the purpose of protecting traditional tribal cultural places (State of California 2005). Contact and notification responsibilities are briefly listed below:

- Prior to the adoption or any amendment of a general plan or specific plan, the local government must notify the appropriate tribes on the Native American Heritage Commission tribal contact list (maintained as required in Government Code §65352.3, §65352, and §65092) for the purpose of preserving or mitigating impacts to cultural places, features, and objects, (described in Sections 5097.9 and 5097.995 of the Public Resources Code) that are located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code §65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within city or county jurisdiction. The referral must allow a 45-day comment period (Government Code §65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local governments must send notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code §65092).

Under SB 18, local governments must consult with tribes under two circumstances:

- On or after March 1, 2005, local governments must consult with tribes that have requested consultation in accordance with Government Code §65352.3. The purpose of this consultation is to preserve, or mitigate impacts to, cultural places that may be affected by a general plan or specific plan amendment or adoption.
- On or after March 1, 2005, local governments must consult with tribes before designating open space, if the affected land contains a cultural place and if the affected tribe has requested public notice under Government Code §65092. The purpose of this consultation is to protect the identity of the cultural place and to develop treatment with appropriate dignity of the cultural place in any corresponding management plan (Government Code §65562.5).

Local

Ventura County General Plan

The Ventura County's General Plan 2040, Chapter 6, Conservation and Open Space Element, subchapter 6.4 addresses the protection, conservation, and preservation of cultural resources (Ventura County 2020c).

6.4 Cultural, Historical, Paleontological, and Archaeological Resources:

COS-4:

- To identify, inventory, preserve and protect cultural, historical, paleontological, and archaeological resources in Ventura County, including Native American resources, for their scientific, educational, and cultural value.

COS-4.2:

- Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation: The County shall cooperate with cities, special districts, appropriate organizations, and private landowners to identify known cultural, archaeological, historical, and paleontological resources to preserve identified resources within the county.
- Cooperation for Tribal Cultural Resource Preservation: For discretionary projects, the County shall request local tribes contact information from Native American Heritage Commission, to identify known tribal cultural resources. If requested by one or more of the identified local tribes, the County shall engage in consultation with each local tribe to preserve, and determine appropriate handling of, identified resources within the county.

COS-4.4: Discretionary Development and Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation

- The County shall require that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources. Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of mitigation and/or extraction of maximum recoverable data. Priority shall be given to measures that avoid resources.

City of Oxnard Regulations

The following goals and policies in the City of Oxnard California General Plan 2030, Cultural and Historic Resources Goals & Policies (City of Oxnard 2016) identifies goals and policies pertaining to cultural resources within the City. The following summarizes the requirements for compliance with the City policies that may be applicable to the proposed project.

- Goal ER 11** Protect the City's cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible. The following policies apply to Goal ER 11:
- ER-11.1 Archaeological Resource Surveys.** Requires a qualified archaeologist to perform a cultural resources study prior to project approval. Inspection for surface evidence of archaeological deposits, and archaeological monitoring during grading should be required in areas where significant cultural resources have been identified or are expected to occur.
- ER-11.2 Requires Mitigating the Impact of New Development on Cultural Resources.** Ensures that alternatives are considered, including planning construction to avoid archeological sites, deeding archaeological sites into permanent conservation easements, and planning parks, greenspace, or other open space to incorporate archaeological sites in the event that development threatens significant archaeological resources.
- ER-11.3 Development Applicants to Conduct Research.** Requires project applicants to have a qualified archaeologist conduct a record search at the South Central Coast Information Center located at California State University Fullerton and other appropriate historical repositories, conduct field surveys where appropriate, and prepare technical reports, where appropriate, meeting California Office of Historic Preservation Standards (Archaeological Resource Management Reports) prior to project approval.
- ER-11.4 Historic Preservation.** Support public and private efforts to preserve, rehabilitate, and continue the use of historic structures, sites, and districts. Where applicable, preservation efforts shall confer with the Ventura County Cultural Heritage Board and conform to the current Secretary of the Interior's Standards for Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building and the California Office of Historic Preservation.
- ER-11.5 State Historic Building Code for Adaptive Reuse.** Utilize, when possible, the State Historic Building Code for historic properties to encourage adaptive reuse.
- ER-11.6 Identification of Archaeological Resources.** In the event that archaeological/paleontological resources are discovered during site excavation, continue to require that grading and construction work on the project site is suspended until the significance of the features can be determined by a qualified archaeologist/paleontologist.
- ER-11.7 Native American Remains.** Requires compliance with State laws relating to the disposition of Native American burials consistent with the CEQA Guidelines (Section 15064.5) if human remains of possible Native American origin are discovered during project construction.
- ER-11.8 Historical Resource Inventory.** Maintain a historical resource inventory, discourage demolition or alteration of historical buildings unless they are declared unsafe, and strongly encourage rehabilitation and/or adaptive reuse.

3.5.2 Impact Analysis

3.5.2.1 Methodology

The methodology for identifying historic resources within the project Site include a record search, NAHC sacred lands search, and a Phase I archaeological survey (Tetra Tech 2022a).

3.5.2.2 Significance Thresholds

The thresholds for cultural resources impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*
- *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*
- *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

3.5.2.3 Project Impacts

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

The records search and NAHC sacred lands search did not identify any known historical resources within or adjacent to the project Site. The historic map and aerial review and Phase I archaeological survey did identify two historic era-built environment resources: the RVD buildings and infrastructure and a residential building constructed between 1947 and 1967. These resources are unrecorded and have not been evaluated for significance eligibility as historical resources under CEQA. Project design indicates a modification to the existing RVD and residential building at 2600 N Rose Avenue, Oxnard, California. It is recommended that a qualified architectural historian assess whether the project will have a potential significant impact to these historic era resources. Incorporation of Mitigation Measure CUL-1 would reduce the potential impact on historical resources to less than significant.

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

The records search, NAHC sacred land search and Phase I archaeological survey did not identify any archaeological sites within or adjacent to the project Site. As discussed above, there is a low to low-moderate potential for the proposed project to impact previously unknown, buried archaeological deposits. The proposed project includes some level of ground disturbance (approximately 1 to 5 feet in depth) and there is a potential that archaeological resources could be unearthed. In the event that unknown archaeological resources are discovered during project construction, significant impacts could occur. Incorporation of Mitigation Measure CUL-2 (Worker Environmental Awareness Training) and CUL-3 (Inadvertent Discovery Plan) would reduce the potential impact on archaeological resources to less than significant.

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

There is no indication, either from the SCCIC record search and literature review results, or the NAHC SLF results, or the Phase I archaeological survey, that any particular location within the project Site has been used for human burial purposes in the recent or distant past. In the event that human remains are inadvertently discovered during project construction activities, existing state laws will be implemented as discussed below.

California state law requires all project excavation activities to halt if human remains are encountered and the County Coroner must be notified. Any discovery of human remains on the project Site would be treated in accordance with PRC Section 5097.98 and Section 7050.5 of the State HSC. Pursuant to State HSC §7050.5, if human remains and/or cultural items defined by the HSC, Section §7050.5, are inadvertently discovered during construction activities, all work within a 100-foot radius of the find or an area reasonably suspected to overlie adjacent remains (whichever is larger) will cease, the find will be flagged and protected for avoidance, and the Ventura County Medical Examiner (805-641-4400) will be contacted immediately. The remains must be securely protected, and project

personnel must ensure confidentiality of the find on a need-to-know basis and ensure that the remains are treated with dignity, not touched, moved, photographed, discussed on social media sources (e.g., Facebook, Twitter, etc.), or further disturbed. If the remains are found to be Native American as defined by HSC, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours. The NAHC shall designate the Most Likely Descendent (MLD) for the remains as stipulated by California PRC Section 5097.98. The MLD(s), with the permission of the landowner and/or authorized representative, shall inspect the site of the discovered remains and recommend treatment regarding the remains and any associated grave goods. The MLD shall complete their inspection and make their recommendations within 48 hours of notification by the NAHC. Construction will not proceed within the 100-foot area (or protected area) around the discovery until the appropriate approvals are obtained. Work may be delayed in the vicinity of the human remains up to 30 days.

The specific State law/regulations regarding proper handling of previously unknown human remains encountered during construction are specified above and the project will comply with the state law/regulations to avoid significant impacts on human remains. In conjunction with the training and inadvertent protocols identified in Mitigation Measures CUL-2 and CUL-3, potential impact to unknown human remains is less than significant.

3.5.2.4 Cumulative Impacts

Based on the cultural resource study (Tetra Tech 2022a), the project Site is within the coastal and Oxnard Plain region that has been inhabited from precontact through the historic era resulting in various types of human land use. For the analysis, the geographic scope for cumulative cultural resources impacts is considered the City of Oxnard within the Oxnard Plain. This geographic scope for the analysis is appropriate because the cultural resources within this area are expected to be similar to those that might occur on the project Site due to the regional proximity and similar environments, landforms, and hydrology that would result in similar land-use and thus, resource types. Hence, this area is suitable to encompass any effects of the proposed project on cultural resources that may combine with similar effects caused by other past, current, and reasonably foreseeable future projects, and provides a reasonable context wherein cumulative actions could affect cultural resources.

Development of the proposed project, in combination with other cumulative projects in the area, has the potential to contribute to a cumulatively significant cultural resources impact due to the potential loss of historical resources, archaeological resources, and human remains unique to the region. However, mitigation measures are included in this EIR to reduce potentially significant impacts to unknown historical/archaeological resources and human remains that could be encountered during construction of the proposed project. Implementation of Mitigation Measures CUL-1 through CUL-3 and existing state laws regarding human remains would reduce the proposed project's incremental potential impacts to historical resources, archaeological resources, and human remains to a less-than-significant level and ensure that proposed project impacts to cultural resources are not cumulatively considerable.

With implementation of the three mitigation measures and existing state laws, as described above, the proposed project would not result in significant impacts to cultural resources. Given this minimal impact, as well as similar mitigation requirements for other projects in the City of Oxnard, the proposed project's incremental effect is not cumulatively considerable when viewed in connection with the effects of other closely related past projects, the effects of other current projects and the effects of probable future projects and thus cumulative impacts to cultural resources would be less than significant.

3.5.2.5 Mitigation Measures

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

CUL-1 Built Environment: Prior to construction of the proposed project, the project owner shall retain a Secretary of Interior qualified architectural historian to assess whether the proposed project will have a potential significant impact to the historic era RDV buildings and infrastructure, and the existing residential building at 2600 Rose Avenue, Oxnard, California.

CUL-2 Cultural Resource Worker Environmental Awareness Training: Prior to any proposed construction ground disturbing activities within the project Site, the RSD Project Manager shall require the construction contractor to provide for all non-cultural resources personnel to be briefed, by a Secretary of Interior qualified project archaeologist (retained on-call by construction contractor) about the potential and procedures for an inadvertent discovery of precontact, tribal, and historic era cultural resources. In addition, the training will include established procedures for temporarily halting or redirecting work in the event of a discovery, identification and evaluation procedures for finds, and a discussion on the importance of, and the legal basis for, the protection of archaeological resources. Personnel will be given a training brochure/handout regarding identification of cultural resources, protocols for inadvertent discoveries, and contact procedures in the event of a discovery. If requested, a local tribal representative(s) shall be invited to participate in the environmental training to discuss or provide text from a tribal cultural perspective regarding the tribal cultural resources within the region.

CUL-3 Inadvertent Discovery Plan: Prior to any proposed construction ground disturbing activities within the project Site, the District Project Manager shall require the construction contractor to retain a Secretary of Interior qualified archaeologist to prepare an Inadvertent Discovery Plan for the proposed project. The Inadvertent Discovery Plan will provide protocols and notification procedures in the event of an inadvertent discovery. During Project construction (e.g., ground disturbing activities such as vegetation removal, excavation, trenching, grading), should subsurface archaeological precontact, tribal, or historic-era cultural resources be discovered, all ground disturbing activities within 50 feet of the find shall cease and the qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the implementing agencies and any local consulting Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Under CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, Project reroute or redesign, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local consulting Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as a historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2. Existing regulations require that if human remains and/or cultural items defined by HSC, Section 7050.5, are inadvertently discovered, all work in the vicinity of the find would cease and the Ventura County Medical Examiner (805-641-4400) would be contacted immediately. If the remains are found to be Native American as defined by HSC, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours.

3.5.2.6 Level of Impact After Mitigation

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

3.6 ENERGY

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

3.6.1 Environmental Setting

3.6.1.1 Existing Conditions

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

3.6.1.2 Regulatory Setting

Federal

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

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

State

The California Energy Commission (CEC) is the State's regulatory agency responsible for creating energy policy and planning for the State's Energy System as a whole. Core responsibilities of the CEC are to achieve energy efficiency, advance state energy policy, develop renewable energy, invest in energy innovation, oversee energy infrastructure, prepare for energy emergencies, and transform transportation.

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

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

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

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

Local

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

The City of Oxnard General Plan provides various goals and policies related to energy generation and increased efficiency. Some of the policies prescribed in the General Plan that are applicable directly and indirectly to the proposed project are listed in Table 3-14.

Table 3-14. City of Oxnard Goals and Policies Applicable to the Proposed Project

Goals/ Policies No.	Title	Description
SC-3.8	Require Use of Passive Energy Conservation Design	In response to the City's EAP, the project will require the use of passive energy conservation by building material massing, building orientation, landscape shading, use of energy efficient materials, and other techniques as part of the design of buildings, where feasible.
SC-3.9	Promote Voluntary Incentive Programs	The project will participate in applicable incentive programs to increase solar photovoltaic system use in new and existing buildings, and the District will continue to participate in the Ventura County Regional Energy Alliance (VCREA).
SC-3.12	Encourage Natural Ventilation	The project will promote use of natural ventilation in new construction and major additions or remodeling consistent with Oxnard's temperate climate.
SC-4.1	Green Building Code Implementation	The project will implement the 2010 California Green Building Code (CALGreen), as may be amended, and consider incorporating Tier I and Tier II voluntary actions under certain conditions (as directed by the Development Services Director).
SC-5.4	Coordinate with Local Utility Providers and VCREA	The project will coordinate with local utility providers (Southern California Edison and Southern California Gas Company) and with VCREA to increase the use of solar photovoltaic systems and other technology in new and existing buildings.
ICS-8.8	Educational Facilities	The project will coordinate with the City of Oxnard to include pedestrian and bicycle access as the preferred access to

Goals/ Policies No.	Title	Description
		schools rather than vehicular. The project also will improve drop off and pick up circulation, especially during the morning and afternoon peak periods.
ICS-11.7	Water Wise Landscapes	The project will promote water conservation in landscaping and incorporate water conserving fixtures (low water usage) and water-efficient plants, to the extent possible, into new and replacement landscaping.
ICS-11.12	Water for Irrigation	The project will use non-potable water supplies for landscape irrigation where available.
CD-7.12	Urban Village Collocation with Schools	The project will promote collocation of parks with school facilities to enhance available open space and recreation to the extent possible.
CD-7.13	Urban Village Trail and Open Connections	The project will include trails (pedestrian and bicycle) and open space areas, where feasible within urban village areas.

Source: City of Oxnard 2016

3.6.2 Impact Analysis

3.6.2.1 Methodology

Methods employed in this energy analysis are based on review of federal, state, and local regulations concerning energy use assessment criteria, and are consistent with CEQA Guidelines. The following sections provide a description of the methodology employed for the impact analysis associated with energy use in the construction and operation of the proposed project.

3.6.2.2 Significance Thresholds

The thresholds for energy impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project could result in a significant impact if it is anticipated to create either of these situations:

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

These situations are evaluated both for the construction phase of the proposed project (short term) and for the operations phase of the proposed project (long term).

3.6.2.3 Project Impacts

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

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

- Buildings will comply with energy efficiency standards;
- All new appliances will adhere to energy and water efficiency standards; and
- Photovoltaic energy generation panels will be incorporated into the project design.

In addition, the City of Oxnard's General Plan and EAP requirements will be followed, as described in Table 3-14.

The middle school expansion will continue to serve a stable student population, and the expanded middle school is designed to accommodate up to an additional 250 students, a potential increase of approximately 30% over the current population.

Short-Term Energy Use

The construction phase is temporary, and it ends once the proposed project is built and construction activities are completed. During the construction phase energy consumption will result primarily from fuel used to power off-road construction equipment, trucks delivering and removing various materials, and vehicles used by employees to travel to the job Site. In addition, fuel use by the bus fleet serving the District's student transportation needs will continue while operating out of the temporary facility at 516 W. Wooley Road.

Construction equipment and trucks would be subject to applicable regulations which include anti-idling measures and use of efficient engines. These measures would prevent the unnecessary use of energy by inefficient equipment. Buses are already in use by the RSD under current conditions. A slight increase in fuel use may result from the use of the temporary facility to park and maintain buses. However, this will be a small amount compared to that needed to continue the bus routes, and since this service is necessary, the temporary increase is not considered wasteful or inefficient.

Therefore, no aspects during construction of the proposed project have been identified to result in any unnecessary use of energy. Thus, the construction of the proposed project is not anticipated to result in wasteful, inefficient, or unnecessary use of energy.

Long-Term Energy Use

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

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

Energy use by the proposed project was calculated using CalEEMod and would occur at a rate of 3.33 giga British Thermal Units per year for natural gas use and 1.45 gigawatt-hours per year for electricity use. By implementing CEC-compliant design features into the expanded middle school facilities and following City of Oxnard goals and objectives in executing the proposed project, energy use per student is expected to decrease.

Actual vehicle fuel use comparisons for the current facilities, including the RDV Middle School and the District Transportation and Parking Facility, are not possible, as data for such calculations are not available. Instead, this evaluation considers current and projected transportation modes to infer potential energy use changes. Under

current conditions the RDV student population arrives at school on a bus or via a self-transport mode (as a pedestrian, on a bicycle, or dropped off from a vehicle). The same will be true after the proposed project is completed and the expanded middle school facilities commence operations. There is no reason to project that the percentage of each mode will change after the proposed project is completed, so this evaluation of potential impacts to energy (fuel) use considers the likely change in efficiency of each mode. Furthermore, walking or riding a bike to school does not use fuel, so neither is a concern of this evaluation. Therefore, only vehicle transport (self-transport mode) and District-provided transport (bus mode) of students are considered.

The new District Transportation and Parking Facility that will be co-located with the expanded middle school facility, will create a separate entrance for bus traffic, both to access the parking/maintenance area and to drop off or pick up students (Stantec 2022b). This will improve the efficiency of the drop-off and pick-up processes for both bus traffic and vehicle traffic. Improved efficiency in these processes translates directly into a smaller amount of fuel used per student per day under proposed conditions. In addition, because the new bus facility will be co-located with RDV Middle School, an efficiency in the total length of bus trips should be realized for the six (6) daily bus trips for the students of RDV Middle School. The remaining 24 bus trips serving the rest of the RSD should at least not increase due to the new facility location and may in fact decrease because the new facility is more centrally located within the RSD. Therefore, the expected energy use per student, is expected to decrease with the expanded middle school facility.

No aspects of the proposed facility operations of the completed project have been identified to result in unnecessary use of energy. Therefore, none of the projected facility operations are expected to cause wasteful, inefficient, or unnecessary consumption of energy resources and project impacts would be less than significant.

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

The proposed project design is consistent with California energy conservation standards codified in CCR Title 24, Part 6 and also with the City of Oxnard EAP (which implements 2030 General Plan goals and strategies, see Table 3-13). Thus, the proposed project is not anticipated to obstruct a state or local plan for renewable energy or energy efficiency, either in the short term or in the long term and project impacts would be less than significant.

3.6.2.4 Cumulative Impacts

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

3.6.2.5 Mitigation Measures

No Mitigation Measures are required.

3.6.2.6 Level of Impact After Mitigation

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

3.7 GEOLOGY AND SOILS

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

- *Update Report of Geotechnical Study Rio Del Valle Middle School Sports Field Complex Phase 2 Improvements, Rio School District, Oxnard, California* (NV5 West, Inc. 2020) (NV5 Update Report).
- *Addendum Geotechnical Letter, Proposed Fieldhouse Building, Sports Field Complex Phase 2 Improvements, Rio Del Valle Middle School, 3100 North Rose Avenue, Oxnard, California* (NV5 West, Inc. 2022) (NV5 Addendum Report).
- *Preliminary Geotechnical Investigation Report, Rio Del Valle Middle School Southern Campus Expansion Project 2600 North Rose Avenue, Oxnard California* (Tetra Tech 2022b) (Preliminary Geotechnical Investigation Report).

The NV5 Update Report (NV5 West, Inc. 2020), NV5 Addendum Report (NV5 West, Inc. 2022), and Preliminary Geotechnical Investigation Report (Tetra Tech 2022b), were performed in accordance with Sections 17212 and 17212.5 of the CEC, the 2016 California Building Code (CBC) (2016 International Code Council [ICC] 2017) as described in the CCR Title 24, and California Department of Conservation, California Geological Survey (CGS, formerly California Department of Conservation, Division of Mines and Geology [CDMG]) Note 48 (Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings (CGS 2013). The NV5 Update Report was reviewed and approved by the CGS in a letter dated September 8, 2022 (CGS 2022). The NV5 Update Report, NV5 Addendum Report, Preliminary Geotechnical Investigation Report, and CGS letter dated September 8, 2022 are included in Appendix D of the EIR

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

3.7.1 Environmental Setting

The project Site is relatively flat, and slopes gently to the south and southwest, with surface elevations ranging from approximately 87 to 94 feet amsl. The project Site is currently being used for organic agricultural production and contains sparse non-native vegetation at the margins (weeds and grasses). Review of historical aerial photographs dating from 1927 to the present time indicate that the project Site has been use for agricultural purposes (crop production) since at least 1927 to the present time.

The proposed project is located on the Oxnard Plain area of Ventura County. The Oxnard Plain is part of the Ventura Basin that is bounded on the north by the Santa Ynez-Topatopa Mountains and on the south by the Channel Islands, the western Santa Monica Mountains, and the Simi Hills. To the east, the basin is bounded by the San Gabriel fault zone. To the west, the Santa Barbara Channel separates the offshore islands from the mainland. Near the Santa Barbara Channel, the Ventura Basin is a transitional zone consisting of a coastal plain and shoreline. The coastal plain is composed of a broad alluvial plain, some of which forms estuaries and lagoons.

Based on the Ventura County Geologic Map for the Oxnard Quadrangle, the Site is underlain by Holocene alluvial fan deposit composed predominantly of alluvial clay, sand, and gravel deposits (Clahan 2003).

3.7.1.1 Existing Conditions

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

Locally, the project Site is situated in the Oxnard Plain sub-province. Lithologic units of sedimentary origin underlying the nearly flat Oxnard Plain are approximately 45,000 feet in thickness and consist of Upper Cretaceous, Paleogene, Neogene, and Quaternary-age units which have been deposited on a pre-Upper Cretaceous base of igneous and/or metamorphic rock. The Site is underlain at the ground surface by unconsolidated Holocene (last 11,000 years) alluvial sediments (Clahan 2003). These sediments were deposited during the post-glacial period associated with the ancient Santa Clara River and Calleguas Creek. These alluvial sediments can reach a depth of approximately 300 feet below ground surface (bgs), and at the Site they extend to approximately 200 feet bgs (Turner and Mukae 1975).

The geology of the Site subsurface in the 11.1-acre southern campus expansion area (a portion of APN 144-0-110-590) was determined from the geotechnical soil boring logs in Tetra Tech's 2022 Preliminary Geotechnical Investigation Report (Tetra Tech 2022b) as follows:

- Shallow undocumented artificial fill soils associated with agricultural activity are present throughout the 11.1-acre southern campus expansion area of the Site. These fills were generated from the tilling of the near surface native soil over the years as well as associated with drainage berms and other associated agricultural and residential improvements. These fills consist of brown silty sands that are loose and damp. The fills were encountered down to a depth of roughly 2 feet bgs but may be locally deeper in association with underground improvements.
- Holocene-age alluvial deposits underlie the fill materials and were encountered to the maximum explored depth of 51 feet bgs during our field exploration. The upper alluvial soils encountered generally consisted of fine-grained silty sands, which were brown, olive, light olive gray and yellowish-brown in color, very loose to loose in density, and damp to moist. Also included in the upper alluvial materials were sandy silt layers and occasional very thin organic rich seams. Below the upper alluvium, the encountered alluvial soils consisted primarily of poorly graded fine to coarse-grained sands with gravels that were light brownish gray in color, medium dense to very dense, and damp.

Please refer to the boring logs included in Appendix A of Tetra Tech's 2022 Preliminary Geotechnical Investigation Report (Tetra Tech 2022b) (Appendix D).

The geology of the Site subsurface in the sports field complex area of the existing main campus area of the Site (a portion of APN 144-0-110-445) Report (Tetra Tech 2022b) was described in the NV5 Update Report (NV5 West, Inc. 2020) as follows:

- The majority of the subject Site is underlain by younger Quaternary alluvium (Qal) consisting of unconsolidated mixtures of sand, silt and clay to the total depth explored. Total depth of younger alluvium at the site is anticipated to be greater than several hundred feet. The deposits are generally considered to be liquefiable.
- Local areas of artificial fill, assumed to be primarily derived from onsite soils, may be present on the Site, associated with past site development.

The Site straddles the boundary between the Oxnard Forebay Basin and the Oxnard Pressure Plain Basin, subbasins of the larger Santa Clara-Calleguas groundwater basin. The Oxnard Forebay Basin is an important groundwater recharge area for valuable resources of groundwater in aquifers underlying the Oxnard Plain while the Oxnard Pressure Plain Basin contains a shallow perched water bearing zone that is separated from the underlying aquifers of the Santa Clara-Calleguas groundwater basin by an aquitard at approximately 50 to 100 feet bgs that inhibits recharge of the underlying groundwater aquifers. The unconsolidated sediments beneath the Oxnard Forebay Basin and Oxnard Pressure Plain Basin and the Site are composed of both continental and marine deposits of Paleogene, Neogene, and Quaternary age. They contain multiple aquifers of coarse grain sediments with intervening fine grain aquitards. Aquifers have been grouped into an Upper Aquifer System (UAS) and a Lower Aquifer System (LAS) based on changes in geologic structure and separated in many areas by regional layers of low permeability clay. The UAS sediments are relatively flat lying and extend to approximately 400 feet beneath the Site. The sediments in the LAS are more structurally complex, resulting from folding and faulting. In the Oxnard Forebay Basin, alluvial sediments in the subsurface are predominantly coarse grain sands and gravels. Fine grain sediments, such as silts and clays, which can act as confining layers are generally absent or discontinuous. This condition allows for direct recharge of the UAS from the surface and some recharge of the LAS from the UAS in the subsurface (Fox Canyon Groundwater Management Agency [FCGMA] 2017; Turner and Mukae 1975).

The first encountered groundwater beneath the Site is in the UAS. Review of potentiometric maps for the UAS from 1972 through 2018 indicate that the depth to groundwater ranged from approximately 33 feet bgs to 139 feet bgs during that time period (FCGMA 2015) (Appendix D). The most recent groundwater elevation data for spring 2018 indicates that the first encountered groundwater in the Site area was at approximately -39 feet below mean sea level (msl) or approximately 138 feet bgs (FCGMA 2019a). The depth to the highest known historical groundwater level in the Site area is approximately 20 feet bgs (CGS 2002).

Groundwater was not encountered to the maximum explored depth of 51 feet bgs in the field exploration for the 2020 NV5 Update Report (NV5 West, Inc. 2020) or Tetra Tech's 2022 Preliminary Geotechnical Investigation Report (Tetra Tech 2022b).

No surface water was observed at the Site in April 2022 during the field exploration for Tetra Tech's 2022 Preliminary Geotechnical Investigation Report (Tetra Tech 2022b). It is likely that during periods of moderate rainfall, free surface water that accumulates on the Site may flow south and southwest and possibly into gutters along North Rose Avenue and Collins Street (Figure 2-2). However, the U.S. Department of Agriculture, Soil Conservation Service report indicates that soil permeability at the Site is moderate and surface runoff is very slow to pond, such that there is a low hazard of erosion by water (USDA Soil Conservation Service 1970).

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

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

with evidence of displacement within the last 1.6 million years (CGS 2007). The terms active and inactive faults have been interpreted differently by geologists, seismologists, and agencies. For this report, active faults are defined as having evidence of surface displacement within the last 11,000 years and potentially active faults are defined as having evidence of surface displacement in the last 1.6 million years (CGS 2007).

The closest active faults that have been zoned for surface fault rupture potential by the California Geological Survey are the Wright Road Fault located approximately 3.1 miles northeast of the Site and the Simi-Santa Rosa Fault Zone located approximately 3.2 miles east of the Site (<https://maps.conservation.ca.gov/cgs/EQZApp/app/>). Therefore, the potential for surface rupture due to faulting occurring beneath the Site is considered low (Jennings et al. 2010).

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

Maps of seismic hazard zones are issued by the CGS in accordance with the Seismic Hazards Mapping Act (SHMA) enacted in April 1990. The intent of the SHMA is to provide for a statewide seismic hazard mapping and technical advisory program to assist cities and counties in developing compliance requirements to protect the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes.

Based on the Official Seismic Hazard Zone Map, released December 20, 2002, for the Oxnard 7.5-Minute Quadrangle (CGS 2002), the project Site is located within an area identified by the State of California as subject to the hazard of liquefaction. The Site is also located within an area mapped as subject to liquefaction potential according to the Ventura County Technical Guidance Manual (TGM) for Stormwater Quality Control Measures (Geosyntec 2011), Figure B-16. The Site is not located within an area identified by the State of California as subject to the hazard of seismically induced landslides.

3.7.1.2 Regulatory Setting

Federal

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

State

Alquist-Priolo Earthquake Fault Zoning Act (1972)

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

established at or in the near vicinity of the Site, and procedures and regulations as recommended by the CGS for investigations conducted in such zones do not specifically apply.

Seismic Hazard Mapping Act (SHMA) (1990)

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

California Building Code (2019)

CCR Title 24, Part 2, the 2019 CBC (California Building Standards Commission 2019), provides minimum standards for building design in the State. Local codes are permitted to be more restrictive than Title 24, but not less restrictive. The procedures and limitations for the design of structures are based on-site characteristics, occupancy type, configuration, structural system height, and seismic zoning. Seismic ratings from the CBC divide the United States into four geographical zones. Most of central and coastal California, including the project Site, is located in Seismic Zone 4. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in California Occupational Safety and Health Administration (Cal/OSHA) regulations in California Code of Regulations, Title 8, Chapter 4, Subchapter 4, Article 6 (State of California Department of Industrial Relations 2019).

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

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

California Geological Survey Note 48 (2013)

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

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

These rules require cities and counties to adopt and enforce the current edition of the 2019 CBC (California Building Standards Commission 2019), including a grading section. The City of Oxnard and Ventura County have adopted and enforce these provisions. Sections of Volume 2 of the 2019 CBC specifically apply to select geologic hazards. Chapter 16 of the 2019 CBC addresses requirements for seismic safety. Chapter 18 regulates excavation, foundations, and retaining walls. Chapter 33 contains specific requirements pertaining to Site demolition, excavation, and construction.

Unreinforced Masonry Law (1986)

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

Division of the State Architect

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

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

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

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

Local

City of Oxnard Regulations

The OMC adopts the 2019 CBC (California Building Standards Commission 2019) and has additional construction requirements in OMC Chapter 14, Building Regulations that has procedures and limitations for structural design based on seismic risk:

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

- SH-1.3 **Building Code Standards.**** Require that all new buildings and alterations to existing buildings be built according to the seismic requirements adopted within the most current City of Oxnard Building Code, or its adopted equivalent.
- SH-1.4 **Soil, Geologic, and Structural Evaluation Reports.**** Require that adequate soils, and geologic and structural evaluation reports be prepared by registered soils engineers, engineering geologists, and/or structural engineers, as appropriate, for applicable development.
- SH-1.5 **Required Geologic Reports.**** Continue to require the submission of a geological report for proposed development located in a potential liquefaction area.
- SH-1.7 **Soil Investigations.**** Continue to require a complete site-specific soils investigation that addresses liquefaction and compressible soil characteristics and identifies construction techniques or other mitigation measures to prevent significant impacts on the proposed development.

- SH-1.8 Mitigating Seismic Hazards.** Where necessary, utilize the expert mitigation measures such as those identified in Special Publication 117: Guidelines for Analyzing and Mitigating Seismic Hazards in California (prepared by the Southern California Earthquake Center) to minimize risk associated with seismic activity.

3.7.2 Impact Analysis

3.7.2.1 Methodology

Tetra Tech performed a comprehensive assessment of the impacts of the proposed project with respect to geologic and soil conditions (Tetra Tech 2022b). This assessment included: a Site reconnaissance, background literature review, drilling soil borings to sample soil and log conditions, laboratory tests on-site materials, an engineering analysis, and report preparation.

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

3.7.2.2 Significance Thresholds

The thresholds for geology and soils impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

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

3.7.2.3 Project Impacts

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

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

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

The Site is in a region of generally high seismicity and has the potential to experience strong ground shaking from earthquakes on regional or local causative faults. In addition, the Site is located in an area that is subject to the hazard of liquefaction. Therefore, per ASCE 7-16 Section 20.3.1, the Site needs to be defaulted as Site Class F and seismic design parameters need to be obtained by a site response analysis performed in conformance with ASCE 7-16 Section 21.1 (American Society for Civil Engineers [ASCE] 2017). However, ASCE 7-16, Section 20.3.1 provides an exception for structures having fundamental periods of vibration equal to or less than 0.5s, where site response analysis is not required for liquefiable soils and the site class may be determined in accordance with Section 20.3, in which case this Site may be classified as a Site Class D. Although it is expected that this exception is applicable to the proposed construction, the structural engineer needs to verify that the natural period of the structures meets this condition (Tetra Tech 2022b).

According to ASCE 7-16 Section 11.4.8, a site-specific ground motion hazard analysis shall be performed if structures on Site Class D have a 1-second period (S_1) greater than or equal to 0.2 unless the seismic coefficient C_s determined by Equation (12.8-2) is used for values of $T \leq 1.5 T_s$ and taken as equal to 1.5 times the value computed in accordance with either Equation (12.8-3) for $T \geq T_s$ or Equation (12.8-4) for $T > T_s$ (ASCE 2017; Tetra Tech 2022b).

Therefore, the findings of Tetra Tech's 2022 Preliminary Geotechnical Investigation Report (Tetra Tech 2022b) show that there is the potential for adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

The potential risks posed by the proposed project from strong seismic ground shaking would be less than significant impacts with mitigation incorporated. Mitigation Measure GEO-1 requires that the building design for structures at the project use geotechnical building design recommendations in accordance with ASCE 7-16 (ASCE 2017) as required by the 2019 CBC (California Building Standards Commission 2019). The geotechnical building design recommendations shall be approved by the CGS and the DSA. With the implementation of Mitigation Measure GEO-1, the project would have a less than significant impact.

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

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

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

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

In Ventura County, paleontological remains, typically identified in Pleistocene-age or older deposits, include examples from throughout most of the related geological history, including the Paleozoic (600–225 million years ago), Mesozoic (225–70 million years ago) and Cenozoic (70 million years ago–present) eras. Based on the geological map of Ventura County, Oxnard quadrangle, the project Site is underlain by Holocene age (10,000 years BP to recent) alluvial fan deposits that comprise the Oxnard Aquifer that are composed of soils that are deltaic alluvium and wash fan deposits to approximately 200 feet bgs in the Site area. These are conformably underlain by upper Pleistocene alluvial sand and gravel deposits that comprise the Mugu Aquifer to approximately 400 feet bgs, and the marine–non-marine clays and gravels of the Lower Pleistocene San Pedro formation that comprise the Hueneme and Fox Canyon Aquifers to approximately 2,000 feet bgs (Gutierrez et al. 2008; Turner and Mukae 1975). Holocene age deposits are considered to have a low sensitivity for yielding paleontological resources. In 2010, a paleontological record search of the museum collection records maintained by the Natural History Museum (NHM) of Los Angeles County was conducted for the Oxnard Airport Land Easement Acquisition Project, approximately 5.3 miles southwest of the project Site (SWCA Environmental Consultants 2009). The record search included a one-mile radius around the airport and indicated that no previously identified paleontological localities occurred within the search area, nor had any resources been reported within the same Holocene age geological unit as the current project area of potential effect (APE) (SWCA Environmental Consultants 2009). Based on the estimated depth of Holocene-age deposits (to at least 200 feet bgs), surficial ground disturbance is unlikely to encounter or cause a substantial adverse change in significance to a paleontological resource (Turner and Mukae 1975). Assuming that Holocene age deposits extend to approximately 200 feet bgs at the project Site, it is highly unlikely that Pleistocene deposits will be encountered during construction. However, if project ground disturbing construction depths exceed the Holocene age deposits or encounters shallow Pleistocene deposits, paleontological

resources may be exposed. Certain fossil remains are only found in isolated outcrops in Ventura County and are therefore of unique scientific interest (County of Ventura 2020a). With the implementation of Mitigation Measure GEO-3 (Paleontological Resource Impact Mitigation Program), the proposed project would have a less than significant impact.

3.7.2.4 Cumulative Impacts

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

3.7.2.5 Mitigation Measures

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

GEO-1: The building design for structures at the proposed project shall use geotechnical building design recommendations that are in conformance with the 2019 CBC and ASCE 7-16 (ASCE 2017). A site-specific ground motion hazard analysis shall be performed if structures on Site Class D have an S_1 greater than or equal to 0.2 unless the seismic coefficient C_s determined by Equation (12.8-2) is used for values of $T \leq 1.5 T_s$ and taken as equal to 1.5 times the value computed in accordance with either Equation (12.8-3) for $T_L \geq T > 1.5 T_s$ or Equation (12.8-4) for $T > T_L$. The Site-specific ground motion hazard analysis and geotechnical building design recommendations shall be approved by the CGS and the DSA.

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

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

- Full-time monitoring by a qualified paleontologist during all grading and excavation extending more than 10 feet bgs or beyond Holocene deposits.
- Spot-check monitoring by a qualified paleontologist for all grading and excavation between 5 and 10 feet bgs to determine whether older sediments with a potential to contain paleontological resources are present.
- Procedures for proposed project personnel and/or paleontological monitor to halt work and temporarily redirect construction away from an area if paleontological resources are encountered during grading or excavation in order to assess the significance of the find.

- Procedures for recommendations regarding level of monitoring effort (e.g., spot check or full-time) depending upon sensitivity of soil depth, identification of finds, etc.
- Procedures for handling collected material and curation.
- Procedures for reporting and documenting the results of the monitoring program.
- Provide brochure of environmental awareness training.

3.7.2.6 Level of Impact After Mitigation

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

3.8 GREENHOUSE GAS EMISSIONS

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

3.8.1 Environmental Setting

3.8.1.1 Existing Conditions

Based on the 2021 Edition of the GHG Emission Inventory for 2000 to 2019 prepared by the CARB, California emitted 418.2 million metric tons of CO₂ equivalent (MMTCO_{2e}) in 2019 (CARB 2022a).

3.8.1.2 Regulatory Setting

Federal

The U.S. EPA is the agency responsible for writing and implementing federal regulation for the protection of the environment, including regulation for GHG emissions. To this end, the U.S. EPA pursues a number of efforts including collection of data, pursuing emissions reductions by promoting clean energy economy and partnering with states, localities, and tribes. The U.S. EPA delegates its authority to 10 executive offices in the United States each of which is responsible for the execution the U.S. EPA programs within several states and territories. California is within the jurisdiction of Region 9.

The U.S. EPA has instituted various regulation measures to reduce GHGs. One of these efforts is codified under 40 CFR, Part 98, which require mandatory reporting of GHG emissions (i.e., CO₂, CH₄, N₂O, sulfur hexafluoride, hydrofluorocarbons, and other fluorinated gases) for certain industrial operations. Most of these industrial operations include electricity generation facilities, oil refineries, and manufacturing operations. Mandatory reporting is also required for combustion sources, such as boilers and stationary engines, which emit more than 25,000 MTCO_{2e} per year.

State

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

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

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

On September 27, 2006, Governor Arnold Schwarzenegger signed into law AB 32, California Global Warming Solutions Act of 2006, which requires the CARB to develop and implement regulations and initiatives to reduce GHG emissions to 1990 levels, or lower, by 2020. CARB established the 1990 target at 427 MMT CO_{2e}. Pursuant to AB 32, CARB has also adopted a number of regulations, which are outlined in the initial Scoping Plan, which CARB adopted in 2008 to prescribe actions aimed at reducing California's GHG emissions. Under AB 32, CARB

has primary responsibility for promulgating regulations, programs, and enforcement mechanisms to achieve the GHG reduction target.

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

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

On December 2007, California adopted regulation for the mandatory reporting of GHG emissions (mandatory reporting regulation [MRR]) under CCR sections 95100-95157 to comply with requirements promulgated by the U.S. EPA in 40 CFR, Part 98. The MRR sets emissions reporting thresholds of 10,000 MTCO₂e. Thus, any project or facility with the potential to emit equal to or greater than 10,000 MTCO₂e from combustion and process emissions would be subject to the MRR reporting requirements.

Regulated GHGs under California HSC 38505 include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), 3-77 nitrogen trifluoride (NF₃). GHGs are commonly quantified in the equivalent mass of CO₂, denoted CO₂e, which takes into account the global warming potential (GWP) of each individual GHG compound. The most common GHG that results from human activity is CO₂, followed by CH₄ and N₂O.

Summary of GHGs

The following narratives provide a brief summary of GHGs.

CO₂ enters the atmosphere through burning fossil fuels (coal, natural gas, and oil), solid waste, trees and wood products, and also as a result of certain chemical reactions (e.g., manufacture of cement). CO₂ is removed from the atmosphere (or “sequestered”) when it is absorbed by plants as part of the biological carbon cycle.

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

N₂O is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

Hydrofluorocarbons, PFCs, SF₆, and NF₃ are synthetic, powerful GHGs that are emitted from a variety of industrial processes. HFCs and PFCs are sometimes used as substitutes for stratospheric ozone-depleting substances (e.g., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). These gases are typically emitted in smaller quantities, but because they are potent GHGs, they are sometimes referred to as High Global Warming Potential gases. SF₆ is employed in electricity transmission and distribution and semiconductor manufacturing. NF₃ results from semiconductor manufacturing processes (CARB 2022b).

Local

The City of Oxnard General Plan provides various goals and policies related to GHG and global warming. Some of the policies applicable directly and indirectly to the proposed project are listed in Table 3-15.

Table 3-15. City of Oxnard Goals and Policies Applicable to the Proposed Project

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

Source: City of Oxnard 2016

3.8.2 Impact Analysis

3.8.2.1 Methodology

Pursuant to state law (CEQA Guidelines 15064.7), VCAPCD is authorized to adopt thresholds of significance for GHG emissions. To date, VCAPCD has evaluated multiple options, but has not made a decision to adopt any of these options. VCAPCD is leaning toward the adoption of thresholds of significance for land use development

consistent with those adopted by the South Coast Air Quality Management District (SCAQMD). On December 5, 2008, SCAQMD Governing Board adopted a proposal for an interim GHG threshold of significance for projects where the SCAQMD is the lead agency. The threshold of significance is applicable for stationary sources and can be used for determining significant impacts for proposed projects (SCAQMD 2008). Under the interim thresholds of significance, projects can emit up to 10,000 metric tons (MT) per year of CO₂e before being deemed as having significant impacts. GHGs resulting from the proposed project were calculated using CalEEMod and compared to the SCAQMD threshold of 10,000 MT per year of CO₂e.

3.8.2.2 Significance Thresholds

The thresholds for hazards and hazardous materials impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

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

3.8.2.3 Project Impacts

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

The proposed project would generate GHGs during construction and operation activities. Detailed GHG calculation input data and results are presented in Appendix C. A summary of GHG emissions from construction and operation activities of the proposed project including, significance with respect to the SCAQMD threshold of 10,000 MT per year of CO₂e is presented in Table 3-16.

Table 3-16. Annual Greenhouse Gas Emissions

Phase	CO ₂ e (MT)
Construction 2023	416
Construction 2024	186
Operation	388
Threshold	10,000
Significant?	No

As identified in Table 3-16, GHG emissions generated by the proposed project would not exceed the identified threshold and therefore project impacts are considered less than significant.

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

As noted above, GHG emissions generated by the proposed project would not exceed the SCAQMD threshold of 10,000 MT per year of CO₂e. Neither construction nor operation of the proposed project is expected to conflict with any applicable plan, policy or regulation of any agency adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, project impacts are considered less than significant.

3.8.2.4 Cumulative Impacts

The proposed project would contribute GHGs which would add to GHG emitted locally and globally. However, the GHG emissions from the proposed project would not exceed the SCAQMD interim threshold of 10,000 MT per year of CO₂e and therefore cumulative project impacts are considered less than significant.

3.8.2.5 Mitigation Measures

No Mitigation Measures are required.

3.8.2.6 Level of Impact After Mitigation

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

3.9 HAZARDS AND HAZARDOUS MATERIALS

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

- *Phase I Environmental Site Assessment Ten Acre Portion for APN 144-110-225 on North Rose Avenue Oxnard, California 93036* (Tetra Tech 2020a).
- *Phase II Environmental Site Assessment Ten Acre Portion for APN 144-110-225 on North Rose Avenue Oxnard, California 93036* (Tetra Tech 2020b).
- *Phase II Environmental Site Assessment Addendum Ten Acre Portion for APN 144-110-225 on North Rose Avenue Oxnard, California 93036* (Tetra Tech 2021b).
- *Phase I Environmental Site Assessment Rio del Valle Middle School Expansion Project 2600 North Rose Avenue, Oxnard, California 93036* (Tetra Tech 2021a).
- *Phase II Environmental Site Assessment Rio del Valle Middle School Expansion Project 2600 North Rose Avenue, Oxnard, California 93036* (Tetra Tech 2021c).
- *Technical Memorandum, Supplemental Site Investigation Field Sampling Plan, Rio Del Valle Middle School Expansion Project 2600 North Rose Avenue, Oxnard, California 93036* (Tetra Tech 2022c).
- *Revised Technical Memorandum, Supplemental Site Investigation Field Sampling Plan, Rio Del Valle Middle School Expansion Project 2600 North Rose Avenue, Oxnard, California 93036* (Tetra Tech 2022d).
- *Supplemental Site Investigation, Rio Del Valle Middle School Expansion Project 2600 North Rose Avenue, Oxnard, California 93036*. September 26 (Tetra Tech 2022e).

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

3.9.1 Environmental Setting

3.9.1.1 Existing Conditions

History and Setting

The northern campus expansion area of the Site (10-acre portion of APN 144-0-110-225 on North Rose Avenue) and southern campus expansion area of the Site (11.1-acre portion of APN 114-0-110-590 at 2600 North Rose Avenue) are currently used for crop cultivation. The southern campus expansion parcel is owned by KMS Industries, Inc. (KMS) and the northern campus expansion parcel that is currently owned by the RSD was formerly owned by KMS. Both the northern and southern campus expansion areas are leased by Reiter Affiliated Companies for organic crop production. Review of historical aerial photographs indicates that the northern and southern expansion areas of the Site have been used for agricultural production since at least 1927 (Tetra Tech 2020a; 2021a). The Rio Del Valle Middle School campus parcel (APN 144-0-10-445) on North Rose Avenue) was formerly used for

agricultural production since at least 1927 until approximately 1961, when the school was constructed (RSD 2022). A residence has been located on the southern campus expansion area since approximately 1959. Tetra Tech reviewed files at the California Geologic Energy Management Division's (CalGEM) website to evaluate potential presence of oil fields and wells within the Site vicinity (Tetra Tech 2020a; 2021a). CalGEM records indicate that the Site is not located in an oil field. The nearest oil field to the Site is the Santa Clara Avenue Field, located approximately 0.5 to 1 mile southeast of the Site. There are no known active or abandoned wells on Site. Two plugged wells are located within 0.4 miles or less from the Site. A more complete description of the historical land use of the Site and surrounding area is provided in the Phase I Environmental Assessments for the northern and southern campus expansion areas (Tetra Tech 2020a; 2021a).

Phase I Environmental Site Assessment for the Ten Acre Portion of APN 144-0-110-225 on North Rose Avenue

The Phase I ESA for the 10-acre portion of APN 144-0-110-225 on North Rose Avenue was performed for the RSD during 2020 (Tetra Tech 2020a). The Phase I ESA identified three Recognized Environmental Concerns (RECs) that required additional assessment:

1. REC 1: Potential former agricultural pesticide application (specifically organochlorine pesticides [OCPs] and arsenic pesticides);
2. REC 2: Potential bunker oil releases from potential former smudge pot frost abatement practices; and
3. REC 3: Three pole-mounted electrical transformers potentially releasing dielectric fluids with polychlorinated biphenyl (PCB) to Site soils.

The Phase I ESA recommended that a Phase II ESA be performed to evaluate the three RECs described above.

Phase II Environmental Site Assessment for the Ten Acre Portion of APN 144-0-110-225 on North Rose Avenue

The Phase II ESA results for the 10-acre portion of APN 144-0-110-225 on North Rose Avenue indicated that the northern campus expansion area was slightly impacted by OCPs (specifically dieldrin) and significantly impacted by diesel range total petroleum hydrocarbons (TPHd), and crude oil range total petroleum hydrocarbons (TPHc) from past agricultural production activities (Tetra Tech 2020b). The Phase II ESA recommended that a Phase II ESA Addendum be performed to evaluate the define the vertical and lateral extent of OCP and TPHd and TPHc impacted soil at the northern campus expansion area and perform a human health risk screening evaluation (Tetra Tech 2021a).

Phase II Environmental Site Assessment Addendum for the Ten Acre Portion of APN 144-0-110-225 on North Rose Avenue

The findings from the Phase II ESA Addendum indicate that the vertical and lateral extent of dieldrin and TPHd and TPHc at concentration equal to or exceeding their relevant screening levels was confined to the surface soil in the vicinity of the samples where they were detected. Information provided by Reiter Affiliated Companies (the tenant performing the organic farming at the northern parcel) indicated that it is was likely that the TPHd and TPHc detected at the northern campus expansion area was from a non-toxic organic mineral oil based miticide used at the northern campus expansion area. The human health risk screening evaluation results indicated that risks associated with residential exposure to maximum detections of detected pesticides in surface soil of the northern campus expansion area are 1×10^{-6} and meets the DTSC target risk of 1×10^{-6} . Therefore, future unrestricted use of the northern campus expansion area is supported based on the human health risk screening evaluation. Tetra Tech determined that no further action is recommended for the northern campus expansion area for as long as the northern campus expansion area is used for agricultural production. Therefore, this issue for the northern campus expansion area will be not evaluated further in the EIR (Tetra Tech 2020b).

Phase I Environmental Site Assessment for the Rio del Valle Middle School Expansion Project 2600 North Rose Avenue

The Phase I ESA for the 11.1-acre portion of 114-0-110-590 at 2600 North Rose Avenue was performed for the RSD during 2021 (Tetra Tech 2021a). The Phase I ESA identified five RECs that required additional assessment:

1. REC 1: Potential former agricultural pesticide application (OCPs and arsenic pesticides);
2. REC 2: Potential bunker oil releases from potential former smudge pot frost abatement practices;
3. REC 3: Observed vehicle-related hydrocarbon and potentially toxic metals releases to surface and near surface soil at the Site from recent storage of junk automobiles and vehicle parking at the Site;
4. REC 4: Observed releases to surface and from near surface soil from two diesel and one gasoline above ground storage tanks (ASTs) at the Site; and
5. REC 5: Three pole-mounted electrical transformers potentially releasing dielectric fluids with PCB to Site soils.

The Phase I ESA recommended that a Phase II ESA be performed to evaluate the five RECs described above.

Phase II Environmental Site Assessment for the Rio del Valle Middle School Expansion Project 2600 North Rose Avenue

The Phase II ESA results indicated that the southern campus expansion area surface soils are impacted by total purgeable petroleum hydrocarbons (TPPH), TPHd, and hydraulic oil/motor oil total petroleum hydrocarbons (TPHh/m) released from the junk vehicles previously stored at the southern campus expansion area and fuel storage ASTs. TPPH, TPHd and TPHh/m were detected in the southern campus expansion area surface soils at concentrations exceeding relevant screening levels. Tetra Tech recommended that the RSD submit the Phase I ESA report (Tetra Tech 2021a) and Phase II ESA report (Tetra Tech 2021c) to the DTSC and enter the southern campus expansion area into the DTSC Voluntary Cleanup Program (VCP). The Phase I ESA report and this Phase II ESA report should be used to support implementing potential remedies for the areas of shallow soil impacted with TPPH, TPHd and TPHh/m at concentrations exceeding the screening levels including either a Housekeeping Removal Action and/or the execution of land use covenants (LUCs). It is expected that with implementation of these remedies, any potential impacts will be reduced to less than significant.

Preliminary Environmental Assessment Equivalent Rio Del Valle Middle School Expansion Project 2600 North Rose Avenue

On behalf of the RSD, Tetra Tech submitted the Phase I ESA (Tetra Tech 2021a) and Phase II ESA (Tetra Tech 2021b) to DTSC as a PEA Equivalent on March 30, 2022. In a letter dated May 10, 2022, the DTSC concurred with the adequacy of the PEA Equivalent pending review of public comments (DTSC 2022a). DTSC's comments on the PEA Equivalent report were included as an attachment to the letter identifying discrepancies that required clarification and/or modification that should be addressed in the Supplemental Site Investigation (SSI). Potential impacts to the soils around the residential structures from OCPs in termiticides and LBP in soil were identified as items that should be further assessed in a SSI. DTSC granted final approval of the PEA Equivalent in a letter dated August 2, 2022 (DTSC 2022c).

Supplemental Site Investigation Rio Del Valle Middle School Expansion Project 2600 North Rose Avenue

A SSI scoping telephone conference was conducted on June 14, 2022 between DTSC, Tetra Tech, RSD, and Sage. The discrepancies that required clarification and/or modification in the May 10, 2022, DTSC letter were discussed in the scoping meeting and resolved for the SSI. The proposed SSI work plan was discussed during the scoping telephone conference, and adjustments were made to the SSI work plan initially presented by Tetra Tech based on

DTSC comments. The SSI scope of work presented below is based on the scope of work agreed on by DTSC, Tetra Tech, RSD, and Sage during the SSI scoping telephone conference.

Tetra Tech prepared the *Technical Memorandum Supplemental Site Investigation Field Sampling Plan, Rio Del Valle Middle School Expansion Project South Parcel 2600 South Rose Avenue, Oxnard, California 93036* (Tetra Tech 2022c) (SSIFSP) to complete the SSI work scope that was agreed on by Tetra Tech, the RSD, and the DTSC during the SSI scoping telephone conference conducted on June 14, 2022. The SSIFSP was conditionally approved by the DTSC in a letter dated July 5, 2022 (DTSC 2022b).

Following review of the proposal to complete the work in the SSIFSP, the RSD requested that Tetra Tech renegotiate with DTSC and request that an LUC be placed on the impacted areas of the Site because the estimated costs to complete the SSI were more than the RSD was willing to spend at this time. A Microsoft Teams meeting was held between Tetra Tech and DTSC on July 25, 2022. In the July 25, 2022 meeting, it was determined that a LUC would not achieve the RSD's objectives for the Site. An alternative strategy was presented by Tetra Tech that eliminated the soil gas survey and direct push drilling at the proposed Site. This strategy reduced the cost for completing the SSI significantly. This approach was accepted by DTSC during the July 25, 2022 meeting.

Tetra Tech prepared the *Revised Technical Memorandum Supplemental Site Investigation Field Sampling Plan, Rio Del Valle Middle School Expansion Project South Parcel 2600 South Rose Avenue, Oxnard, California 93036* (Tetra Tech 2022d) (RSSIFSP) to complete the revised SSI work scope that was agreed on by Tetra Tech on behalf of the RSD and the DTSC during the SSI scoping telephone conference conducted on July 25, 2022. The RSSIFSP was submitted to DTSC by Tetra Tech on August 5, 2022. DTSC conditionally approved the RSSIFSP in a letter dated August 11, 2022 (DTSC 2022d).

Tetra Tech completed the SSI field investigation on August 15 and 16, 2022. The SSI field investigation included:

- The collection of 85 discrete and 10 duplicate soil samples to assess the extent of gasoline fraction total petroleum hydrocarbons (TPHg) (equivalent to TPHH), TPHd, and motor oil fraction total petroleum hydrocarbons (TPHm) (equivalent to TPHh/m) in soil where old vehicles were formerly parked and near the fuel ASTs;
- The collection of 11 discrete surface soil samples, 11 discrete subsurface soil samples, and 3 duplicate soil samples to assess potential OCPs in soil around the residential structures; and
- The collection of 11 discrete and 2 duplicate soil samples to assess potential lead in soil around the residential structures from LBP.

Twenty seven (27) discrete and two duplicate surface soil samples were selected for laboratory analysis for TPHg, TPHd, and TPHm using EPA method 8015B. Seven (7) discrete and two duplicate subsurface soil samples were selected for laboratory analysis for TPHg, TPHd, and TPHm using EPA method 8015B. Eleven (11) discrete surface, 11 discrete subsurface, and three duplicate soil samples were collected and submitted for laboratory analysis for OCPs using EPA method 8081A. Eleven (11) discrete surface and 2 duplicate soil samples were collected and submitted for laboratory analysis for total lead using EPA method 6010B.

For the SSI, the extent of TPHg, TPHd, and TPHm in soil at the Site was evaluated using the combined soil sample results from the Phase II ESA (Tetra Tech 2021b) and the SSI. The TPHg, TPHd, and TPHm sample results were compared to the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) Tier 1 Environmental Screening Levels (ESLs) of 100 mg/kg for TPHg, 260 mg/kg for TPHd, and 1,600 mg/kg for TPHm.

The surface soil sample laboratory analytical results from the 2021 Phase II ESA (Tetra Tech 2021b) contained TPHg, TPHd, or TPHm at concentrations greater than SFRWQCB Tier 1 ESLs at seven locations. For the SSI step out soil samples were collected at seven locations identified in the Phase II ESA to assess the lateral and vertical extent of TPHg, TPHd, or TPHm at concentrations greater than SFRWQCB Tier 1 ESLs. The step out surface soil samples from the SSI contained TPHd at concentrations exceeding the SFRWQCB Tier 1 ESL at three locations.

The estimated combined lateral extent of TPHg, TPHd, and TPHm in soil at the Site at the seven locations is estimated to be approximately 78.5 square feet (ft²), extending to approximately 1-foot bgs with an estimated volume of approximately 2.9 cubic yards (CY).

Eleven (11) discrete surface, 11 discrete subsurface, and three duplicate soil samples were submitted for laboratory analysis for OCPs using EPA method 8081A.

The OCP soil sample results were compared to the DTSC-Modified Soil Screening Levels (DTSC RSLs) (DTSC 2020, Revised May 2022). OCPs were detected in the at six sample locations in six surface soil samples and one subsurface soil sample at concentrations exceeding DTSC RSL. The extent of OCPs soil at concentrations above at concentrations exceeding DTSC RSL has not been assessed.

Eleven (11) discrete surface soil samples were submitted for laboratory analysis for total lead using EPA method 6010B. Total Lead was not detected at concentrations above the DTSC RSL of 80 mg/kg

A Human Health Risk Evaluation (HHRE) was conducted for hypothetical residential exposures to the chemicals of potential concern (COPCs) identified in soils at the RDV School Expansion Project's southern campus expansion area through sample data collected during the Phase II ESA investigation and the SSI. The COPCs evaluated are TPH, OCPs, and total lead. The human health risk was evaluated assuming unrestricted residential land use (residential scenario), regardless of current and future uses. Middle school children and staff are the receptor groups most likely to be exposed to any chemicals potentially present at the project Site. The results of the risk characterization for the hypothetical residential scenario based on the maximum detected concentrations yielded a cumulative estimated cancer risk of 2×10^{-5} , which is in the middle of the USEPA risk range of 10^{-6} to 10^{-4} . COPC-specific estimated risks for toxaphene, dieldrin, DDT, and chlordane levels detected in soil resulted in an estimated risk that exceed the residential target risk level (1×10^{-6}). The estimated cumulative risk for the RME Estimated Risk Evaluation is 7×10^{-6} , within the USEPA risk range. Only toxaphene and dieldrin exceed the residential target risk level of 1×10^{-6} (estimated risk was 2.9×10^{-6} and 2.5×10^{-6} for toxaphene and dieldrin, respectively). It should be noted that actual exposure risks for students and teachers will be lower than those estimated by the hypothetical residential scenario.

Based on the results of the SSI HHRE, Tetra Tech recommended that additional step out sampling be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels be performed at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should also be performed at sample location SS-35.

Once the extent of OCPs at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of RDV Expansion Project.

3.9.1.2 Regulatory Setting

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

A material may also be classified as a hazardous material if it contains defined amounts of toxic chemicals. The EPA has developed a list of specific hazardous wastes that are in the forms of solids, semisolids, liquids, and gases. Producers of such wastes include private businesses and federal, State, and local government agencies. The EPA

regulates the production and distribution of commercial and industrial chemicals to protect human health and the environment. The EPA also prepares and distributes information to further the public's knowledge about these chemicals and their effects and provides guidance to manufacturers in pollution prevention measures, such as more efficient manufacturing processes and recycling used materials.

Federal

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

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

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

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

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

Federal OSHA (29 USC 651 et seq.)

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

Hazardous Waste Operations Emergency Response (HAZWOPER)

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

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

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

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

State

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

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

Government Code Section 65962.5

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

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

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

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

These regulations require worker notification of hazardous substances in the workplace. Parts of Title 8 of CCR Sections 1532.1 and 1529 provide for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to lead and asbestos as well as regulate abatement and disposal of these materials.

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

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

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

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

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

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

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

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

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

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

Education Code, Sections 17213.1, 17213.2, and 17268

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

- **Phase I ESA:** The Phase I ESA must contain sufficient information to determine whether there is a potential for exposure to hazardous materials and must conclude that either (1) a further investigation of the Site is not required, or (2) further investigation is necessary.
- **PEA:** If a school district chooses to proceed with a PEA, it must enter into an Environmental Oversight Agreement with DTSC to oversee preparation of the PEA. DTSC must then assist the district with scoping the work plan for the PEA investigation. Sampling could include soil gas, soil matrix, groundwater, and other sampling and calculation of cancer risks and non-cancer risks. Based on information developed during the PEA and a conservative human and ecological risk evaluation, the DTSC would then make a decision regarding potential risks posed by the Site. Possible outcomes of the DTSC's decision include the following:
 - The process continues through an **SSI** process if the site is found to be significantly impacted by hazardous materials, and the school district elects to continue to pursue site development;

- **Removal Action:** If localized hazardous impacts are found that can eliminate or mitigate conditions through excavation; and
- Issuance of a “No Further Action” finding if the site is found not to be significantly impacted and risks to human health and the environment are found to be within acceptable levels based on the conservative screening level human health risk assessment. Any human health risk assessment must be quantitative for both residential and school-based receptors. The effort entails data aggregation, selection of chemicals of potential concern, exposure assessment, toxicity assessment, and risk characterization.
- **Removal Action:** A school district can choose to enter into a Voluntary Cleanup Agreement (VCA) with DTSC if the district elects to perform a removal action to prepare the site for use as a school site where the presence of contaminants have been confirmed through a PEA or SSI that exceed human health risk assessment guidelines for protectiveness for school-based receptors.

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

Education Code, Section 17215

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

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

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

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

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

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

The site selection guide outlines the requirements of the CDE regulations for site selection that are described above and includes recommendations that are designed to ensure a safe school environment and facilitate State approval

of sites. The guide helps school districts determine compliance with the requirements of CDE Regulations Section 14010 et seq. and Education Code Section 17213 et seq. (LSA 2013).

Local

Within the unincorporated areas of Ventura County, the County of Ventura Resource Management Agency Environmental Health Division has jurisdictional responsibility as the CUPA.

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

3.9.2 Impact Analysis

3.9.2.1 Methodology

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

3.9.2.2 Significance Thresholds

The thresholds for hazards and hazardous materials impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *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?*
- *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

3.9.2.3 Project Impacts

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

Potential hazardous materials use and storage at the proposed Site in the past from agriculture practices is discussed in Section 3.9.1.1, is evaluated further below, and is mitigated with the implementation of Mitigation Measure HAZ-1. The new DTPF proposed as part of the project would include the handling of potentially hazardous materials and substances and generate hazardous waste. The handling of potentially hazardous materials and substances and generation of hazardous waste would be performed under State and local laws and regulations with regulatory oversight, including but not limited to the DTSC, the City of Oxnard, and County of Ventura. With the implementation of Mitigation Measure HAZ-1, the proposed project would have a less than significant impact.

Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As stated in Section 3.9.1.1, additional step out sampling should be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should also be performed at sample location SS-35.

Once the extent of OCPs at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of the RDV Expansion Project. The OCP and TPH housekeeping soil removal action will be considered complete following DTSC granting a No Further Action status to the project Site. With the implementation of Mitigation Measure HAZ-2, the proposed project would have a less than significant impact.

3.9.2.4 Cumulative Impacts

The proposed project and all new building projects within the surrounding study area (City and the County) would be required to comply with the applicable State and local requirements, including, but not limited to, the DTSC, CDE, FAR, Caltrans, County of Ventura Department of Airports (DOA), Ventura County, and the City of Oxnard, and would be required to implement recommendations of the Site-specific PEA Equivalent Report, SSI Report, and associated DTSC approval letters. For these reasons, the proposed project's contribution to cumulative hazards and hazardous materials is less than significant.

3.9.2.5 Mitigation Measures

HAZ-1: The handling of potentially hazardous materials and substances, and generation of hazardous waste at the new DTPF would be performed under federal, state, and local laws and regulations with regulatory oversight, including but not limited to the DTSC, the City of Oxnard, and County of Ventura.

HAZ-2: Additional step out sampling should be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should be performed at sample location SS-35. Once the extent of OCPs at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of the RDV Expansion Project. The OCP and TPH housekeeping soil removal action will be considered complete following DTSC granting a No Further Action status to the project Site.

3.9.2.6 Level of Impact After Mitigation

Implementation of, and compliance with, Mitigation Measures HAZ-1 and HAZ-2 would reduce all potentially significant impacts related to hazards and hazardous materials to a less than significant level.

3.10 HYDROLOGY AND WATER QUALITY

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

3.10.1 Environmental Setting

3.10.1.1 Existing Conditions

Surface Water

Although the EPA My Waters Data and Tools GIS (2022) shows the project Site is located within the Mugu Lagoon Hydrologic Unit (180701030201) and Ventura's Countywide Stormwater Quality's Countywide Unified Storm Drain Mapping System (2022b) indicates the project Site is within the Nyeland drainage area. The County's GIS (2022b) also shows no stormwater conveyance infrastructure around the existing middle school or the proposed expansion Site. Jensen Design & Survey's (Jensen's) *Preliminary Drainage Report* (Jensen 2022a) states that site drains to the southeast via surface flow and discharges to a City of Oxnard reinforced concrete box in Auto Center Drive, approximately 0.25 mile from the Site. It appears from the County of Ventura's GIS, runoff on Auto Center Drive flows east and discharges to an open ditch known as Nyeland Drain (traveling north and then east around agricultural land and the community of Nyeland Acres), then south into Beardsley Channel (Wash)/Revlon Slough over two miles downstream of the project Site. Thus, the proposed project would ultimately discharge to Revlon Slough/Calleguas Creek Watershed. The primary water sources for Beardsley Channel and Revlon Slough are agricultural and storm water (County of Ventura 2014).

The project Site does not contain any streams, wetlands, or other waters under jurisdiction of the U.S. Army Corps of Engineers (USACE), RWQCB, or CDFW. The City of Oxnard's storm water drainage features are maintained by the City of Oxnard Public Works Department Operations Division and Ventura County Watershed Protection District (VCWPD).

Groundwater

UWCD manages surface and groundwater resources within the area's eight groundwater basins, including the Oxnard Forebay that underlies the proposed project Site and is delineated as the unconfined portion of the Oxnard Plain groundwater basin (UWCD 2013). The Fox Canyon aquifer, comprised of marine shallow regressive sands and some clays, underlies the Oxnard Forebay Basin.

The Oxnard Forebay is bordered by the Santa Paula and Mound basins on its northern boundary and surrounded by the Oxnard Plain basin on its west and south boundary. The Oxnard Forebay is delineated as the unconfined portion of the Oxnard Plain basin (UWCD 2013) and is the main source of recharge to the Oxnard Plain (UWCD 2017). High water levels in the Forebay exert positive pressure on the confined aquifers of the Oxnard Plain and water flow from the recharge areas toward the coast (UWCD 2017).

The Oxnard Forebay basin has an approximate area of 5,370 acres with a length of approximately 5.5 miles and width of 2.4 miles. Surface elevation along the SCR changes approximately 40 feet over its length within the basin, resulting in a gentle gradient of approximately 7 feet per mile. The unconfined Oxnard Forebay contains both the UAS and LAS. As the Oxnard Forebay basin aquifers are in direct hydraulic connection with the confined aquifer of the Oxnard Plain basin, it is the primary source of recharge to that basin. The Oxnard Forebay basin is also a source of recharge to other adjacent and regional basins: Mound, West Las Posas, and Pleasant Valley, but the majority of its groundwater underflow is downgradient to the Oxnard Plain basin (UWCD 2013). The UAS (Oxnard and Mugu aquifers) in the Oxnard Forebay basin consists primarily of coarse-grained alluvium deposited by the ancestral Santa Clara River and is laterally extensive over the entire basin. A geophysical investigation in the basin has shown the Oxnard aquifer to range in thickness from roughly 200 to 280 feet (UWCD 2013).

Saltwater intrusion affects a 23-square-mile area of the Oxnard aquifer from Point Mugu north to the Oxnard Forebay. Groundwater recharge to the Oxnard Forebay is a major component in the overall groundwater management strategy to reduce the severity of the overdraft in the Oxnard Plan and Pleasant Valley basins (UWCD 2013). The aquifer is primarily recharged by streambed percolation, managed aquifer recharge from diverted stream flow, mountain-front recharge, deep percolation of precipitation into the alluvial sediments and rock outcrops, and irrigation return flow.

FCGMA is the Groundwater Sustainability Agency, established through the Sustainable Groundwater Management Act (SGMA) requirements, and oversees management of the basin. FCGMA has imposed allocation cutbacks for the City of Oxnard (City) and other basin users to meet sustainability goals to achieve sustainability and prevent net seawater intrusion after 2040; the City is required to reduce groundwater extractions by 45% by 2040, or 2.2% per year (WSC 2021). To address high total dissolved solids (TDS) in groundwater supply, the City operates a desalter and blends the local groundwater with imported water to keep TDS levels low as possible (WSC 2021).

Additionally, the City initiated the Aquifer Storage Recovery Project, which is intended to increase water supply reliability by expanding recycled water production to protect the Oxnard Basin from overdraft and seawater intrusion. The City also projects substantial water shortages by 2040 due to increased droughts and groundwater restrictions. Thus, the City will expand the capacity of the Advanced Water Purification Facility and the associated distribution system by 14.4 million gpd. Construction is expected to be completed in 2027. On May 13, 2022, the U.S. EPA announced a \$48 million Water Infrastructure Finance and Innovation Act (WIFIA) loan to the City to support this project.

Locally, groundwater was not encountered at the project Site to the maximum explored depth of 51 feet during the project's preliminary geotechnical investigation (Tetra Tech 2022b). Tetra Tech found that groundwater depth beneath the Site during the period from 1972 through 2016 ranged from approximately 33 to 133 feet, based on historical FCGMA reports. The Oxnard 7.5-minute Quadrangle indicates that the historic high groundwater level at the Site is at a depth of about 20 feet, which was the depth used for the geotechnical liquefaction analyses (Tetra Tech 2022b).

Groundwater Quality

The Oxnard Forebay has coarse alluvial sediments that allow leaching from soil to groundwater, which has resulted in periodic nitrate concentrations exceeding the State Water Resources Control Board (SWRCB's) Division of Drinking Water's Maximum Contaminant Level for this parameter. The elevated concentrations are contributed to agricultural irrigation and runoff and septic systems. Drought conditions have caused an increase in exceedances over time. UWCD recharge activities act to dilute these concentrations by adding low-nitrate water sources (UWCD 2017).

Allocation

Locally, domestic water supply for RSD facilities has historically been provided by three active groundwater wells and domestic water connections with the City of Oxnard and UWCD. The three wells are located at Rio Real School, RDV Middle School, and the El Rio Elementary School. After the FCGMA adopted Ordinance E, water allocations for these three wells were reduced to a total of 52.074 AFY. El Rio Elementary School site was sold to a developer and is to be replaced by the Rio Urbana residential community. The Rio Urbana project included the annexation of the site into the City of Oxnard and the transfer of 40.399 AFY of groundwater pumping allocation for the on-Site well. Following this transfer, the RSD has 11.675 AFY water allocations remaining for the two wells located at Rio Real School and RDV Middle School. 54.6 AFY of FCGMA water allocations are to be transferred to RSD with the newly-acquired land to expand the RDV campus. The water transfer amount will need to be finalized in a formal written agreement with the sellers of both parcels. With this transfer, RSD will have a total of 66.275 AFY of FCGMA water allocations (Jensen 2022b).

Potable Water Sources

Three sources supply water to the existing RDV school: the on-Site well (subject to FCGMA requirements), UWCD, and the City of Oxnard. The City of Oxnard supplies water for the gymnasium, UWCD supplies water for the existing main campus buildings, and the on-Site RDV well supplies irrigation water for landscaping and watering of play fields. The Rio Real school well supplies water for on-Site landscaping, as well (Jensen 2022b).

Potable Water Use

Following the Rio Urbana and new farmland water allocation transfers, the City requires selected new development projects to design and construct dual piping systems within their project areas to facilitate the delivery of recycled water for non-potable uses, such as irrigation of landscaping and athletic fields. Infiltration of water used for irrigation or other outdoor uses and stored in the infiltration basin would contribute to recharge of the underlying basin. RSD will have a surplus of 24.685 AFY ($66.275 \text{ AFY} - 41.59 \text{ AFY} = 24.685 \text{ AFY}$) water allocations to supply for the two existing schools before the RDV expansion (Jensen 2022b).

Flood Hazard Zones

The proposed project is located in the Santa Clara River Levee (Federal Emergency Management Agency (FEMA; ID No. 18) Improvements Upstream of Highway 101 (SCR-1) Project area, which consists of structural improvements intended to provide flood protection for residential, public, commercial, industrial, and agricultural areas along the river within the floodplain of the Santa Clara River. The SCR-1 Project occurs along approximately 2 miles of the existing levee system and creates approximately 0.8 miles of new levee segment beginning at the Central Avenue Drain and ending near East Vineyard Avenue (County of Ventura 2020b). The levee improvement project is currently in the CEQA process. The project lies directly northwest of the proposed project location.

As shown in the FEMA Flood Insurance Rate Map (FIRM) for Ventura County Incorporated Areas, the proposed project area is not within a flood hazard zone (FEMA 2020). According to the *City of Oxnard Integrated Master Plan* (Carollo 2017), the project Site is located in an “Area of Minimal Flooding”. According to the Tsunami Inundation Map for Emergency Planning Oxnard Quadrangle prepared by the California Emergency Management Agency, CGS, and the University of Southern California (2009), the project Site is well outside of any tsunami inundation areas. No lakes, rivers, or other inland waters that could cause a seiche are located near the project Site. The County of Ventura has not identified “seiche zones” and the Ventura County General Plan, Hazards Appendix states that there is no historic record of a seiche occurring in Ventura County, although County residents experienced small seiches caused by swimming pools during the 1994 Northridge earthquake (County of Ventura 2013).

A dam that stores more than 1,000 AF of water, is higher than 150 feet, and has the potential to cause downstream property damage is classified as a *high hazard dam* by FEMA. A review of *Ventura County General Plan, Hazards Appendix* (County of Ventura 2020a) and the *Ventura County Multi-Jurisdictional Hazard Mitigation Plan* (County of Ventura 2015) indicates that there are four major reservoirs in the Santa Clara River watershed upstream (northeast) of the project Site that FEMA designated as “high hazard dams” that would inundate the project Site in the event of a reservoir failure. The location of these reservoirs is identified in Figure 3-9 and information for each of these four dams is summarized below.

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

Castaic Dam. The Castaic Dam is operated by the California Department of Water Resources (DWR), can hold up to 325,000 AF of water, and is located on Castaic Creek approximately 45 miles upstream of the project Site. Data provided by the DWR indicates that the project Site would be inundated by flood waters between four and five hours after a failure of the Castaic Dam (DWR 1975).

Pyramid Dam. The Pyramid Dam is operated by the DWR, can hold up to 179,000 AF of water, and is located on Piru Creek approximately 20 miles upstream of the Santa Felicia Dam and 55 miles upstream of the project Site (Figure 3-9). Data provided by the DWR indicates that the project Site would be inundated by flood waters between four and five hours after a failure of the Pyramid Dam (DWR 1998).

Bouquet Canyon Dam. The Bouquet Canyon Dam, operated by the Los Angeles Department of Water and Power (LADWP), can hold up to 36,500 AF of water and is located approximately 60 miles upstream of the project Site (Figure 3-9). Data provided by LADWP indicates that the project Site would be inundated by flood waters between five and five and a half hours after a failure of the Bouquet Canyon Dam (LADWP 2015).



Rio Del Valle Middle School

Major Reservoir Locations

Rio Del Valle Environmental Impact Report



5383 Hollister Ave., Suite 130
Santa Barbara, CA 93111

TC NO.	DATE	DRAWN BY	MAP NO.	FIGURE
41651	09/07/2022	BURSON		3-9

3.10.1.2 Regulatory Setting

Federal

In 1972, the Federal Water Pollution Control Act (commonly referred to as the Clean Water Act [CWA]) was amended to prohibit the discharge of pollutants into waters of the United States from any point source unless the discharge was compliant with a NPDES permit. The CWA was amended again in 1987 to require that U.S. EPA establish regulations for the permitting of storm water discharges (as a point source) by municipal and industrial facilities under the NPDES permit program. In 1990, the regulations were expanded to include construction projects that encompass five or more acres of soil disturbance and again in 1999 to lower the permitting threshold from five acres to one acre.

The CWA requires states to adopt water quality standards for water bodies, which consist of designated beneficial uses for a water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. If designated beneficial uses of a water body are being compromised by water quality, Section 303(d) of the CWA requires states to identify and list that water body as impaired. Once a water body is deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards.

As stated in Section 3.10.1.1, the proposed project Site indirectly flows to storm drain inlets located on Auto Center Drive, which flow to Nyeland Drain, which discharges to Calleguas Creek Reach 4 (Revlon Slough). Revlon Slough is listed as impaired for Diazinon, nitrate, nitrite, and total nitrogen. Downstream reaches have additional impairments and seven TMDLs have been adopted for the Calleguas Creek Watershed: nitrogen compounds; organochlorine pesticides (DDT and chlordane) and PCBs; siltation; toxicity (i.e., pollutants that kill aquatic life or impair its ability to reproduce), chlorpyrifos, and diazinon; metals (copper) and selenium; salts (chloride, total dissolved solids, boron, and sulfate); and trash (SWRCB 2022).

State

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCB broad powers to protect water quality. The Porter-Cologne Water Quality Control Act authorizes the SWRCB and the nine RWQCBs to protect State surface water and groundwater quality through the NPDES programs and issue permits. California NPDES permits are also referred to as waste discharge requirements (WDRs), which regulate discharges to waters of the United States. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require clean-up of discharges of hazardous materials and other pollutants.

Basin Plan

Each RWQCB must develop and adopt a water quality control plan for its region. The Los Angeles RWQCB adopted the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) (Los Angeles RWQCB 2014) for its region of responsibility, which includes the project Site. The Los Angeles RWQCB has delineated water resource area boundaries based on hydrological features and identified existing and potential beneficial uses for each of the water bodies described in the Basin Plan. The Basin Plan also establishes narrative and numeric water quality objectives and contains the State's anti-degradation policy for inland surface waters and groundwater. If these objectives are exceeded, the Los Angeles RWQCB can use its regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters. The Los Angeles RWQCB implements the Basin Plan by issuing orders for investigation and cleanup or abatement at sites containing discharges of waste and by prohibiting certain discharges of waste in some areas. The Basin Plan is also implemented by encouraging water users to improve the quality of their water supplies, particularly where the wastewater they discharge is likely to be reused.

Receiving waters are the Nyeland Drain, which does not have beneficial uses and Calleguas Creek Reach 4 ([Revlon Slough], Pleasant Valley Road to Central Avenue) has the beneficial uses of (Los Angeles RWQCB 2014):

- Agriculture supply (existing use);
- Groundwater supply (existing use);
- Industrial process (potential use);
- Municipal and domestic supply (potential use);
- Warm freshwater habitat (existing use);
- Wildlife habitat (existing use); and
- Possible wetland habitat (existing use).

Clean Water Act, Sections 401 and 404

Section 401 of the CWA requires that an applicant for any federal permit (e.g., a USACE §404 permit) obtain certification from the state that the discharge would comply with other provisions of the CWA and with state water quality standards. For example, an applicant for a permit under Section 404 of the CWA must also obtain water quality certification per Section 401 of the CWA. Section 404 of the CWA requires a permit from the USACE prior to discharging dredged or fill material into waters of the United States, unless such a discharge is exempt from CWA Section 404.1 For the proposed project Site, the Los Angeles RWQCB must provide the water quality certification required under Section 401 of the CWA. Water quality certification under Section 401 of the CWA, and the associated requirements and terms, is required in order to minimize or eliminate the potential water quality impacts associated with the action(s) requiring a federal permit. No wetlands have been identified in the proposed project Site and, therefore, it is unlikely that the project would need a federal permit related to jurisdictional channels or wetlands (see Section 3.4 Biological Resources).

NPDES

All construction sites one acre or greater in size or are less than an acre, but part of a larger common plan of development, are subject to the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 20090009-DWQ, NPDES No. CAS000002*, known as the Construction General Permit (CGP) (SWRCB 2009), which regulates stormwater discharge from construction activities³. The CGP requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that contains specific actions, known as best management practices (BMPs), to control the discharge of pollutants, including sediment, into Waters of the U.S. A Notice of Intent (NOI) to perform work under the CGP must be filed with the State, which certifies that the CGP requirements, such as pollution control, BMP inspections, water quality monitoring, and reporting, will be performed. The CGP also has a requirement to control post-construction runoff from new impervious surfaces created as part of a project to match pre-project hydrology in order to reduce impacts to receiving conveyances and water bodies. The CGP states, “This ‘runoff reduction’ approach is analogous in principle to low impact development (LID) and will serve to protect-related watersheds and water bodies from both hydrologic-based and pollution impacts associated with the post-construction landscape.” The CGP contains Post-Construction Standards; however, it defaults to the post-construction standards of the overlying municipality if the municipality has its own standards (see discussion below regarding the City of Oxnard’s post-construction standards).

³ A new Construction General Permit, draft Order WQ 2022-XXX-DWQ, is expected to be adopted by the SWRCB in September 2022. The new permit will contain the prohibition of trash in storm water and non-storm water discharges when the permit is reissued.

In order to terminate CGP coverage and file a Notice of Termination (NOT) with the State Water Board, the project must demonstrate that final stabilization has been reached (i.e., area disturbed by construction activities must be re-established to a uniform vegetative [or alternative permanent] cover equivalent to 70% coverage of the preconstruction vegetative conditions); all elements of the SWPPP must be complete; no greater potential for construction related pollutants to be discharged into the site runoff than pre-construction; all construction materials, equipment, wastes, and temporary and plastic-containing BMPs must be removed from the site; compliance with Post Construction Standards must be demonstrated; and a post-construction control measure long-term maintenance plan must be established. The RWQCBs review the photographs provided with the NOT to confirm post-construction site conditions and may perform a site visit and/or inquire with the regulating municipality that post-construction standards and long-term maintenance requirements (discussed in Local subsection below) have been met in order to approve the NOT.

On June 6, 2013, the Los Angeles RWQCB adopted *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, Order No. R4-2013-0095, NPDES General Permit No. CAG994004* (Groundwater Discharge Permit). This permit regulates discharges of treated and untreated groundwater from construction to surface waters. This permit specifies the discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater dewatering during construction activities and drilling, construction, and purging of wells. Dischargers are required to collect and analyze representative groundwater samples, and based on the results, dischargers would be required to provide treatment for any toxic compounds detected above the applicable screening levels. To obtain coverage under the Groundwater Discharge Permit, each proposed discharger must submit a NOI.

California SB 610 and 221

State of California SB 610 and 221 require municipalities to consider the availability of adequate water supplies for certain types of new development projects. The SBs require the development of a Water Supply Assessment by either the water supplier or the lead agency for the project for the following:

- Proposed residential development of more than 500 dwelling units;
- Proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- Proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- Proposed hotel or motel of more than 500 rooms;
- Proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- Mixed-use project that falls in one or more of the above-identified categories; or
- Project not falling into one of the above-identified categories but would demand water equal to or greater than a 500-dwelling unit project.

The proposed project does not appear to meet these seven categories or exceed thresholds and, thus, a Water Supply Assessment is not required.

California Executive Order N-7-22

Approximately 40% of the City's water supply is imported from northern California via the State Water Project (SWP) as distributed to the City via CMWD, which receives water from the Metropolitan Water District of Southern California (MWD). The California DWR initially set the 2022 SWP allocation at 15% of normal. However, after a historically

dry start to the year with no significant storms in the forecast, the allocation was reduced from 15% to 5%. Following the 5% SWP allocation update, MWD indicated that SWP-dependent regions of its service area, including CMWD, have insufficient supplies to meet current water demands. In response, CMWD declared a Stage 3 Water Shortage on April 6, 2022, and called on all water users within its service area to immediately reduce water by up to 30%.

Additionally, California Executive Order N-7-22 was issued on March 28, 2022, which declared a State of Emergency and directed drought response actions. Effective until January 2023, the following are prohibited:

- Outdoor watering that allows water run onto sidewalks and other areas (except incidental runoff);
- Washing vehicles without an automatic shutoff nozzle;
- Washing hard surfaces like driveways or sidewalks that don't absorb water;
- Street cleaning or construction site preparation;
- Filling decorative fountains, lakes, or ponds;
- Outdoor watering within 48 hours after at least 1/4-inch of rainfall; and
- Watering ornamental turf on public medians.

Effective until June 2023:

- Watering non-functional lawns in commercial, industrial, and institutional areas, including common areas of homeowners' associations (HOAs) are prohibited.
- Urban water suppliers must implement all local Level 2 demand reduction actions.

All water use prohibitions above are "infractions" and any organization that has the authority to enforce infractions may do so, including local water suppliers and cities. Violations may be punishable by a fine of up to \$500 per day.

On May 17, 2022, the Oxnard City Council proclaimed the existence of a local emergency due to drought conditions and lack of water supply and adopted Resolution 15,569 establishing new mandatory water conservation measures. Applicable mandatory water conservation measures for the proposed project are:

- Watering lawns and landscape, including park and school grounds, is prohibited except between 4:00 p.m. and 9:00 a.m. or 6:00 p.m. and 9:00 a.m. during Daylight Savings Time and no more than once per week (City of Oxnard 2022e, Section 4.a, Section 4.d).
- The following watering following watering schedule is established (City of Oxnard 2022e, Section 4.b):
 - Odd numbered addresses (Ending in 1, 3, 5, 7, 9): Sundays only.
 - Even numbered addresses (Ending in 0, 2, 4, 6, 8): Saturdays only.
 - No watering between 9:00 a.m. and 4:00 p.m. (non-Daylight Savings Time).
 - No watering between 9:00 a.m. and 6:00 p.m. (Daylight Savings Time).
- Exceptions to the above are (1) hand watering trees or other perennials with use of a container (e.g., bucket or watering can) or a hose fitted with a shut-off nozzle and (2) using drip irrigation or other high-efficiency irrigation systems to apply water at a weekly volume consistent with the one-day watering restriction imposed on less efficient irrigation systems (City of Oxnard 2022e, Section 4.c).
- Irrigating sports fields may be more frequent than the above restrictions, but only as necessary to maintain playing surface quality (City of Oxnard 2022e, Section 4.e).

Local

Since July 8, 2010, the County of Ventura has been subject to the *Waste Discharge Requirements for Storm Water (Wet Weather) and Non-Storm Water (Dry Weather) Discharges from the Municipal Separate Storm Sewer Systems (MS4s) with the Ventura County Watershed Protection District, County of Ventura, and the Incorporated Cities Within*, Order No. R4-2010-0108, NPDES Permit No. CAS004002 (MS4 Permit) (Los Angeles RWQCB 2010). The VCWPD is the principal permittee, and the City of Oxnard is a co-permittee, along with the County and all the other cities within the County. Part 4, Section E of the MS4 Permit includes Planning and Land Development requirements. The goal of the Planning and Land Development Program is to minimize runoff pollution typically caused by land development and protect the beneficial uses of receiving waters. To achieve this goal, the MS4 Permit requires new development and redevelopment to control pollutants, pollutant loads, and runoff volume emanating from impervious surfaces by limiting the effective impervious area (EIA) to 5% or less of the project area. New development and redevelopment must also be able to accommodate water from a 0.75-inch storm event with no water leaving the site. These requirements must be achieved through implementing post-construction control measures.

The County developed the *Ventura County Technical Guidance Manual for Stormwater Control Measures (TGM)* (County of Ventura 2011, updated in 2015 and 2018). The TGM prescribes the use of stormwater management control measures for new development and redevelopment projects in the County of Ventura and the incorporated cities therein. The TGM includes guidance for mitigating potential water quality impacts from new development and redevelopment projects. Design criteria are further detailed in the *Ventura County Hydrology Manual* and the design calculator (VCWPD 2017).

OMC Chapter 22, Article XII relates to stormwater quality management. The article prohibits non-stormwater discharges into the City's MS4. OMC Section 22-219 requires a Stormwater Pollution Control Plan (SWPCP) for new development over four lots. The SWPCP requires implementation of BMPs to effectively prohibit the entry of pollutants from the construction site into the storm drain system during construction. However, City of Oxnard Ordinance 2876 amends OMC Chapter 22, Article XII and it requires new and redevelopment projects to develop Post-Construction Storm Water Management Plans (PCSMPs) (Carollo 2015). The ordinance describes the required features of the PCSMP and requires the plan to follow the TGM and include engineering calculations.

The City of Oxnard reviews proposed project PCSMPs to confirm that they follow the TGM guidance. The City of Oxnard also requires a notarized Declaration of Restrictive Covenant for Storm Water Quality Control Measures Maintenance and Access to hold the property owner accountable for maintaining post-construction control measures and to authorize City access to the features for inspections, emergency issues, etc.

General Plan

Per the 2017 City of Oxnard's CEQA Guidelines, "Discussions and background information related to Hydrology and Water Quality are found in two chapters of the 2030 General Plan EIR (Infrastructure and Community Services and Safety and Hazards). The first chapter addresses water quality issues that may be associated with wastewater treatment discharges or other discharges that may involve water pollution, including the management of stormwater discharges. The Safety and Hazards chapter addresses hydrology issues associated with flooding, affecting the 100-year flood plain, and potential development in these areas. For all the issues within this topic, it was determined that the application of existing statutory and regulatory requirements and compliance with existing City and agency programs would address potential significant impacts."

City of Oxnard Water Neutrality Policy

On January 15, 2008, the City of Oxnard adopted a policy that ensures mitigation measures are imposed as part of approval of new development, so that the associated demand remains consistent with available supplies (the Water Neutrality Policy). The net result of this policy is that project approvals include conditions that: a) control the pace of construction of any given project (and thus the pace at which water demand increases); b) allow participation in

the contribution toward the development of additional water supplies that offsets the demand associated with the project; or c) suspend project approval until sufficient supplies are available to support the anticipated project demand. The Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. New development includes all planned (anticipated in the General Plan) and any unplanned future development. Under the policy, a development can be water neutral by meeting its projected demand through one or more of the following:

- Transfer of existing FCGMA groundwater allocations to the City;
- Contributing to increased efficiency by funding City water conservation programs;
- Funding recycled water retrofit projects; or
- Providing additional water supplies.

City of Oxnard 2030 General Plan

Chapters 4, 5, and 6 of the City of Oxnard 2030 General Plan (City of Oxnard 2016) describes relevant goals and policies applicable to water supply and quality, stormwater drainage, water resources, and flood control. The relevant goals and policies applicable to new schools within the City, as applied to Hydrology and Water Quality as described in Chapters 3, 4, 5 and 6 of the City of Oxnard 2030 General Plan are described as follows.

General Plan Chapter 3 Community Development

- Goal CD 8** Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.
- CD 8-10** **Timing of Large-Scale Development.** Consider at an early stage the infrastructure investment needs of large-scale developments to evaluate these needs as part of long-range water supply, conveyance, wastewater, and other relevant planning.
- Goal CD 16** Coordinated land use and infrastructure decisions with economic development.
- CD 16.4** **Evaluate Fiscal Impacts.** Evaluate the fiscal impacts of new development and encourage a pattern of development that allows the City to provide and maintain a high level of urban services (fire and police services, water, sewer, solid waste, transportation, parks, etc.) and community facilities as well as attract targeted businesses and a stable labor force.

General Plan Chapter 4 Infrastructure and Community Services

- Goal ICS-1** Provision of adequate facilities and services that maintain service levels, with adequate funding.
- ICS-1.1** **Maintain Existing Service Levels.** Maintain the high priority of providing services to residents and visitors and prevent deterioration of existing service levels.
- ICS-1.2** **Development Impacts to Existing Infrastructure.** Review development proposals for their impacts on infrastructure (e.g., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.
- ICS-1.4** **Infrastructure Conditions of Approval.** New development should not be approved unless:
- The applicant demonstrates adequate public services and facilities are available;

- Infrastructure improvements incorporate a range of feasible measures that can be implemented to reduce all public safety and/or environmental impacts associated with the construction, operation, or maintenance of any required improvement;
- Infrastructure improvements are consistent with City infrastructure master plans; and
- Required infrastructure needed for future new development is self-funded.

Goal ICS-11 Water supply, quality, distribution, and storage adequate for existing and future development.

Goal ICS-11.5 Sustainability of Groundwater Supply. Support the policies of the FCGMA to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.

Goal ICS-11.9 Groundwater Extractions. Continue to adhere to the recommendations of the Ventura County Regional Water Quality Planning Program regarding groundwater quality and extractions.

Goal ICS-11.11 Water Quality. Monitor water quality regularly to ensure that safe drinking water standards are met and maintained in accordance with State agencies with jurisdiction and EPA regulations and take necessary measures to prevent contamination.

Goal ICS-11.13 Water Neutral Policy and Urban Water Management Plans. Incorporate the City's Water Neutral Policy regarding new development into the 2010 Urban Water Management Plan and develop appropriate ordinances, policies, and/or programs to fully implement the policy.

Goal ICS-12 Adequate capacity at the City Waste Water Treatment Plant to accommodate existing and future development.

ICS-12.3 Wastewater Discharge Monitoring. Monitor and ensure that discharges comply with approved permits.

ICS-12.4 Wastewater Discharge. Treat all wastewater in compliance with approved discharge permits.

ICS-12.5 Sedimentation Control. Require by conditions of approval that silt and sediment from construction be either minimized or prohibited.

Goal ICS-13 Adequately sized storm drain systems and discharge treatment, certified levees, and implementation of appropriate NPDES permits and regulations.

ICS-13.1 100-year Floodplain. Discourage development, major infill, and structural improvements (except for flood control purposes) within the 100-year floodplain as regulated by FEMA. Recreational activities that do not conflict with habitat uses may be permitted within the floodplain.

ICS-13.2 Adequate Storm Drains and NPDES Discharge Treatment. Provide storm drainage facilities with sufficient capacity to protect the public and property from the appropriate storm event and strive to meet stormwater quality discharge targets set by NPDES and related regulations.

ICS-13.3 Stormwater Detention Basins. Design stormwater detention basins to ensure public safety, to be either visually attractive or unobtrusive, provide temporary or permanent wildlife habitats, and recreational uses where feasible considering safety concerns.

ICS-13.4 Low Impact Development. Incorporate LID alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness; (2) runoff storage; (3) hydro-modification (to mimic pre-development runoff volume and flow rate); and (4) public education.

General Plan Chapter 5 Environmental Resources

- Goal ER-5** Well managed water supply and wastewater treatment programs that together meet expected demand, prevent groundwater overdraft, and ensure water quality.
- ER-5.1 Wastewater Treatment.** Treat all wastewater in compliance with approved discharge permits.
- ER-5.2 208 Wastewater Control Plan.** Support updating the “208” Wastewater Control Plan to control urban and nonurban runoff.
- ER-5.3 Reducing Dependence on Groundwater.** The City shall maintain a minimal dependence on Basin 4A groundwater consistent with the Groundwater Recovery Enhancement and Treatment (GREAT) Program and support the policies of the FCGMA to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.
- ER-5.4 Wastewater Monitoring.** Monitor all wastewater discharges on a periodic basis to ensure that discharges comply with approved permits.
- ER-5.6 208 Groundwater Plan.** Adhere to the recommendations of the 208 Plan regarding groundwater extractions.
- ER-5.7 Minimizing Paved Surfaces.** Require minimization and/or permeability of paved surfaces in new developments and replacement paving, where feasible.

General Plan Chapter 6 Safety and Hazards

- Goal SH-1** Minimal damage to structures, property, and infrastructure as a result of liquefaction and subsidence.
- SH-1.2 Minimize Subsidence Trends.** Avoid increases in the level of groundwater extraction as a method for meeting new water demands if the extraction leads to subsidence, or unless a comprehensive reinjection program is approved and implemented to offset extractions.
- Goal SH-3** New development required to take necessary precautions prior to any construction to mitigate hazards and protect the health and safety of the inhabitants.
- SH-3.1 Location of New Development.** Encourage new development to avoid areas with high geologic, tsunami, flood, beach erosion, and fire or airport hazard potential.
- SH-3.2 New Development Flood Mitigation.** As a condition of approval, continue to require new development to mitigate flooding problems identified by the National Flood Insurance Program and/or other expert information.
- SH-3.3 Updating Flood Insurance Rate Maps.** Continue to provide information to FEMA to ensure that FIRM are updated periodically.
- SH-3.4 Avoiding Blockage of Natural Drainage.** Continue to review development proposals to ensure that the capacity or ability of natural drainage is not impacted.

3.10.2 Impact Analysis

3.10.2.1 Methodology

Project impacts to hydrology and water quality were evaluated based on the proposed project’s adherence to local, State, and federal standards; proposed land use; design; and proposed BMPs for control of surface runoff and reduction of pollutants in runoff. A desktop review was conducted of relevant documents, including:

- *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Los Angeles RWQCB 2014);
- *Technical Guidance Manual for Stormwater Quality Measures - New Development and Redevelopment Projects* (County of Ventura 2011, updated 2015 and 2018);
- *Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for Ventura County and Incorporated Areas* (FEMA 2022);
- *Ventura County General Plan, Hazards Appendix* (County of Ventura 2013);
- *2020 Urban Water Management Plan* (WSC 2021);
- *Multi-Jurisdictional Hazard Mitigation Plan for Ventura County, California* (County of Ventura 2015);
- *City of Oxnard California 2030 General Plan, Goals and Policies* (City of Oxnard 2016);
- Inundation maps for the Santa Felicia Dam (UCWD 1974), Castaic Dam (DWR 1975), Pyramid Dam (DWR 1998), and Bouquet Dam (LADWP 2015); and
- Various documents developed by Jensen, including *Rio de Valle Middle School Expansion Preliminary Drainage/Hydrology Report* (Jensen 2022a); *Grading Plan*, dated June 14, 2022; and Technical Memorandum: *Proposed Rio del Valle School Expansion Domestic Water Demand and Allocations* (Jensen 2022b); and *Sewer Preliminary Investigation (Rio del Valle School Campus Expansion)* (Jensen 2022c). These Jensen letter reports and plan are provided in Appendix H.

3.10.2.2 Significance Thresholds

The thresholds for hydrology and water quality impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- *Would the project substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
 - i) *Result in substantial erosion or siltation on- or off-Site;*
 - ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or 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 of polluted runoff; or*
 - iv) *Impede or redirect flood flows?*
- *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*
- *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

3.10.2.3 Project Impacts

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

Construction Storm Water

Construction of the proposed project would disturb approximately 11 acres (only southern campus expansion area included, as agricultural operations in the northern campus expansion area are exempt from the Construction General Permit). During construction, pollutants of concern include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Additionally, excavated soil would be exposed, so there would be an increased potential for soil erosion compared to existing conditions. Lastly, chemicals, petroleum products (such as paints, solvents, and fuels), and concrete-related waste could spill or leak and have the potential to be transported via storm runoff into downstream receiving waters (ultimately the Pacific Ocean). Since the proposed project will disturb greater than one acre of land, the proposed project must comply with the CGP. Pursuant to the CGP, a Site-specific SWPPP must be prepared that details construction BMPs for use during construction activities. Construction BMPs, as detailed in the project-specific SWPPP would include, but not be limited to, run-on and runoff controls, erosion and sediment controls designed to minimize erosion and retain sediment on-Site, and good housekeeping BMPs intended to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. The CGP requires weekly inspections, storm water monitoring, and reporting to ensure the BMPs are installed or implemented and effective. The proposed project includes a mix of landscaping and hardscape, which will prevent any increased risk of sediment discharge during the operation of the proposed project.

It is not anticipated that the groundwater table would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Groundwater may contain high levels of TDS and other constituents that could be introduced to surface waters. Any groundwater dewatering performed during excavation would be completed in accordance with the Los Angeles RWQCB's Groundwater Discharge Permit. This permit requires testing and treatment (as necessary) of groundwater prior to its discharge off-Site. If perched groundwater is encountered during construction, then under Mitigation Measure HYDRO-1, the RSD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein to ensure that the proposed project would not violate any water quality standards or waste discharge requirements.

Post-Construction Storm Water

In order to terminate CGP coverage by filing a NOT with the State Water Board, the proposed project must demonstrate that final stabilization has been reached (i.e., area disturbed by construction activities must be re-established to a uniform vegetative [or alternative permanent] cover equivalent to 70% coverage of the preconstruction vegetative conditions); all elements of the SWPPP must be complete; no greater potential for construction related pollutants to be discharged into the Site runoff than pre-construction; all construction materials, equipment, wastes, and temporary and plastic-containing BMPs must be removed from the Site; compliance with the MS4 Permit's post-construction standards (pursuant to the TGM, County of Ventura 2015) must be demonstrated; and a post-construction control measure long-term maintenance plan must be established.

At the time of developing this EIR, Jensen's *Rio de Valle Middle School Expansion Preliminary Drainage/Hydrology Report* (Jensen 2022a) proposes the southern campus expansion area's post-construction control measures consist of capturing runoff from the project Site, other than that from the 98% pervious sport fields at the southeast corner of the project Site, in storm drains that will route runoff to a hydrodynamic separator for pretreatment, then into an infiltration/detention basin during low- and high-level rain events. Mid-level rain events will bypass the system with a diversion structure. Discharges from the basin will flow south to Collins Street, which borders the project Site to the south, and flow east to the existing City stormwater conveyance system on Auto Center Drive. The report states that the modeled infiltration volume and basin freeboard storage exceeds the 2021 Ventura County MS4

Permit (Order R4-2021-0105) and *Ventura County Technical Guidance Manual* (County of Ventura 2011, updated 2015 and 2018) requirements.

A PCSMP, Design Criteria Checklist from Appendix G of the TGM, and Covenant for Maintenance of PCSMP that describes the post-construction features and calculations must be submitted to the City of Oxnard for review for all applicable new development projects. Additionally, the RWQCB will require verification of installation of the City-approved post-construction control measures and development of the long-term maintenance agreement as part of the NOT approval process. The post-construction features constructed and maintained in accordance with the TGM would comply with water quality standards and mitigate hydrologic impacts incurred by the new impervious surfaces.

Wastewater

The City of Oxnard provides existing wastewater service to RDV through an extension of the sewer main in Rose Avenue to the existing project Site. The 11.1-acre southern campus expansion area is currently served by a residential septic system and does not contribute to the wastewater system. Sewer service is proposed to be provided to the southern campus expansion area via a new connection to the City of Oxnard sewer main, separate from the existing main campus sewer. The nearest City line is an 8-inch line in Collins Street, adjacent to the southerly boundary of the site. The line runs east in Collins Street and south in Via Estrada before discharging to a 15-inch trunk line in Auto Center Drive at a manhole in the intersection (Jensen 2022c).

Sewer service for new improvements on the existing main campus will be via connecting to the existing RDV sewer Point of Connection (assuming adequate capacity). Jensen analyzed the proposed increase in sewer flow due to the proposed campus expansion to show its impact on existing infrastructure. It was determined that the existing 8-inch sewer line that the project Site will connect to and the downstream 15-inch trunk line will meet the City of Oxnard's standards and capacity criteria and are sufficiently sized to accommodate the needs of the proposed project (Jensen 2022c).

With compliance with existing regulations including implementation of stormwater BMPs that target pollutants of concern in runoff from the project Site, implementation of Mitigation Measure HYDRO-1 and connection to the Oxnard Wastewater Treatment Plant (OWTP), the potential for violation of water quality standards or waste discharge requirements and degradation of water quality would be less than significant.

Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

During construction, it is not anticipated that the groundwater table would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Any groundwater dewatering performed during excavation would be temporary, not result in a substantial volume removed, and completed in accordance with the Los Angeles RWQCB's Groundwater Discharge Permit. Grading and construction activities would compact soil, and construction of structures would increase impervious area, which can decrease infiltration during construction. However, construction activities would be temporary, and the reduction in infiltration would not be substantial relative to the Oxnard Forebay Groundwater Basin. Conversely, the proposed post-construction infiltration/detention basin may contribute to groundwater recharge in the Oxnard Forebay, which is highly desirable. Therefore, construction of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Construction impacts related to groundwater supplies would be less than significant and no mitigation is required.

Potable Water Sources

The proposed project will increase the school's water demands. The new 10-acre northern campus expansion area will require irrigation water for crops. Using the FCGMA Crop Year Irrigation Allowance Table, and assuming the crops are avocados with 20-70% ground shading, typical precipitation, the farm will require 2.0 acre-feet/acre. Given the farm is 10 acres, this results in 20 AFY demand for the northern campus expansion area. The southern campus

expansion area will increase the number of classrooms and add a bus wash. Additionally, the proposed project plans to replace all existing and new sports fields with “xeriscape” (i.e., landscape requiring very little to no irrigation), resulting in a net decrease in landscaping water demand. Jensen calculated the ratio between the existing and proposed areas to determine the projected water demand. They found RSD will have a net surplus of 17.701 AFY of water allocations with the proposed project (Jensen 2022b). Additionally, the City requires selected new development projects to design and construct dual piping systems within their project areas to facilitate the delivery of recycled water for non-potable uses, such as irrigation of landscaping and athletic fields. Infiltration of water used for irrigation or other outdoor uses and stored in the infiltration basin would contribute to recharge of the underlying basin. A portion of the proposed project’s wastewater will be treated at the publicly owned treatment works (POTW), treated at the Advanced Water Purification Facility (AWPF), and injected into the groundwater basin. Therefore, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operational impacts related to groundwater supplies would be less than significant and no mitigation is required.

Neutrality

The City developed a credit bank for use during extended drought or water supply restricted conditions and will gradually restore its groundwater credit bank as a buffer against future supply constraints with the GREAT Program (City of Oxnard 2012). It is anticipated that reasonably-projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection are sufficient to meet the water demand associated with the proposed project, in addition to the City’s existing and planned future uses (City of Oxnard 2012). Furthermore, the City imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The requirements of the City Water Neutrality Policy are included in the proposed project’s water allocation analysis (Jensen 2022b). The City is requiring the proposed project to present a plan for water neutrality. Therefore, with the implementation of Mitigation Measure HYDRO-2, the proposed project’s impacts on groundwater supply would be less than significant.

Would the project substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-Site?

During construction activities, the project Site would be graded and excavated, exposing soil and increasing the potential for soil erosion compared to existing conditions. During a storm event, soil erosion and sedimentation could occur at an accelerated rate. For example, excavation activities result in soil stockpiles, which has the potential to be washed into storm drains, blown off-Site by wind, or tracked off-Site by heavy equipment. In addition, construction activities would compact soil, and construction of structures would increase the impervious area, which can increase runoff during construction. Since the proposed project will disturb greater than one acre of land, the proposed project must comply with the CGP. Pursuant to the CGP, a Site-specific SWPPP must be prepared that details construction BMPs for use during construction activities. Construction BMPs would include, but would not be limited to, erosion and sediment controls designed to minimize substantial erosion or siltation. Prior to terminating coverage under the CGP, the project Site must be stabilized and not pose any additional sediment discharge risk than it did prior to the commencement of construction activity. The proposed project includes a mix of landscaping and hardscape that will minimize erosion. Implementation of the Site-specific SWPPP during construction activities would reduce the potential for altering drainage patterns or causing flooding to less than significant levels during construction. Additionally, much of the runoff from the Site will be retained and/or treated within post-

construction control measures. Therefore, the proposed project will not result in substantial erosion or siltation on- or off-Site.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-Site?

There are no on-Site streams or rivers; therefore, the proposed project would not alter the course of a stream or river. Although the existing drainage pattern of the project Site would be substantially altered, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion, sedimentation, or flooding on- or off-Site with compliance with existing regulations and the MS4 Permit's post-construction standards. Operational impacts related to on- or off-Site erosion, siltation, and flooding would be less than significant, and no mitigation is required.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Currently, storm water discharges from the existing middle school and project Site discharge via sheet flow southeast to storm drains on Auto Center Drive, approximately 0.25 mile from the project Site. The proposed project will route storm water from pervious and impervious surfaces via storm drain inlets, curbing, and piping and will continue to discharge to Auto Center Drive after construction of the southern campus expansion area is complete. The City requires that new development not exceed 1 cubic foot per second per acre (cfs/ac) runoff discharge rate and Jensen has designed the proposed infiltration/detention basin with this standard incorporated. The 1 cfs/ac flow rate was deemed an acceptable flow rate to prevent downstream flooding of the receiving waters and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems.

The proposed project would change on-Site drainage patterns by adding impervious surface areas, including buildings and parking lots, and constructing drainage structures. An increase in impervious area would increase the volume of runoff during a storm, which would more effectively transport pollutants to receiving waters. As stated above, the proposed features include pre-treatment of runoff from the southern campus expansion area with hydrodynamic separators (Downstream Defender or similar) (Jensen 2022a). The treated water would then flow into the infiltration/detention basin, except mid-level flows that will bypass the system. Through these stormwater control measures, both on-Site and off-Site flooding will be controlled. Operational impacts related to capacity of stormwater drainage systems would be less than significant and no mitigation is required.

iv) Impede or redirect flood flows?

Although the project's new impervious surfaces would change the hydrology on Site, the proposed post-construction features (pre-treatment system and infiltration/detention basin) are specifically designed to prevent alteration of downstream watercourses and restrict flood potential. Additionally, the Site's stormwater conveyance features will be sized to the City's allowable flow rate (i.e., less than 1 cfs/ac), which is designed to prevent downstream flooding. Therefore, both on-Site and off-Site flooding will be controlled.

Because the project Site is outside the 100-year flood zone, it is not within a flood hazard area. Additionally, the proposed project would not involve placing structures that would impede or redirect flood flows within a 100-year flood hazard area. Therefore, the proposed project would not place within a 100-year flood hazard area structures that would impede or redirect flow and project impact would be less than significant.

In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Flood Hazard

As shown in the FEMA FIRM for Ventura County Incorporated Areas, the project Site is not within a flood hazard zone (FEMA 2020). According to the City Integrated Master Plan (Carollo 2017) the project Site is located in an “Area of Minimal Flooding”.

The proposed project is located in the Santa Clara River Levee (SCR-1) (FEMA ID No. 18) Improvements Upstream of Highway 101 Project area, which consists of structural improvements intended to provide flood protection for residential, public, commercial, industrial, and agricultural areas along the river within the floodplain of the Santa Clara River, risk of levee failure would be mitigated. Additionally, compliance with Mitigation Measure HYDRO-3, which requires RSD to develop and implement a Site-specific flooding evacuation plan to be implemented in conjunction with the OES *Dam Failure Response Plan*, project impacts would be less than significant.

Tsunami and Seiche Hazard

According to the Tsunami Inundation Map for Emergency Planning Oxnard Quadrangle prepared by the California Emergency Management Agency, CGS, and the University of Southern California (2009), the project Site is well outside of any tsunami inundation areas. No lakes, rivers, or other inland waters that could cause a seiche are located near the project Site. The County of Ventura has not identified “seiche zones” and the Ventura County General Plan, Hazards Appendix states that there is no historic record of a seiche occurring in Ventura County, although County residents experienced small seiches caused by swimming pools during the 1994 Northridge earthquake (County of Ventura 2013). Therefore, tsunamis and seiches are not considered to be potential hazards to the project Site and there is no impact.

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

The Oxnard Plain Basin is the primary source of groundwater supplying Oxnard's service area. The FCGMA allocates and limits groundwater extraction volumes to address overdraft and to bring the basins to “safe yield” (when groundwater extraction from a basin are approximately equal to annual replenishments of water into the groundwater basin; the safe yield estimate for the FCGMA area is approximately 120,000 AFY), mostly to halt groundwater intrusion (WSC 2021). The FCGMA SGMP addresses the long-term sustainability of the basin for municipal and agricultural pumpers. The SGMP contains historical data, groundwater levels, groundwater quality, subsidence, groundwater-surface water interaction, historical and projected demands and supplies, recharge areas, measurable objectives, interim five-year milestones, a sustainability goal, and a plan to achieve the goal in 20 years, with a 50-year planning and implementation horizon. Although the proposed project will increase water demand, the FCGMA water allocations are sufficient to provide this supply and will have a net surplus of 17.701 AFY (Jensen 2022b). Therefore, the proposed project is not expected to conflict with the SGMP and project impacts to the SGMP will be less than significant.

3.10.2.4 Cumulative Impacts

The proposed project's contribution to cumulative impacts to hydrology and surface water quality would be less than significant. The cumulative impacts of the proposed project on hydrology and water quality are:

Surface Water. The proposed project would not alter the City's storm water drainage features associated with the project Site. The increase in runoff volume and rate caused by the proposed project's new impervious surfaces would be mitigated by the project's proposed post-construction features, which are required by the Construction General Permit and the City's MS4 Permit, will follow the TGM (County of Ventura 2011, updated 2015 and 2018), will be defined in the PCSMP, and vetted by the City. The design to the storm water drainage features will be required to comply with the City's 1 cfs/ac flow rate to prevent downstream flooding of the receiving waters and

compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems. Therefore, the proposed project's contribution to cumulative storm water drainage impacts would be less than significant.

Groundwater. The proposed project is not anticipated to impact groundwater quality. The underlying Oxnard Forebay may receive some recharge from runoff infiltration in the proposed retention basin and irrigation infiltration from the educational agricultural fields, landscaping, and sports fields, which would be beneficial to the groundwater basin. Although irrigation and agricultural runoff can contain nitrogen-based products and cause leaching of nitrate into the basin and the Oxnard Forebay has been prone to nitrate MCL exceedances, the net contribution would be lower post-construction due to the transition of the southern campus expansion area from agriculture to educational land use. Therefore, the proposed project's contribution to groundwater impacts would be less than significant.

Flooding. The project Site is located outside of the 100-year and 500-year floodplain, is not within a levee or flood risk area, and it not in a seiche, tsunami, or mudflow risk area. The proposed project will discharge no more than the City-required 1 cfs/ac off-Site (Jensen 2022a) to avoid flooding impacts downstream. Given the installation of post-construction features described above, the proposed project would not impact increase overall flood potential in the City. Therefore, the proposed project's contribution to cumulative flooding impacts would be less than significant.

3.10.2.5 Mitigation Measures

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

HYDRO-1: If perched groundwater is encountered during construction, the RSD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein.

HYDRO-2: The proposed project shall meet its City of Oxnard Water Neutrality Policy requirements by completing at least one of the following:

- Transfer of existing FCGMA groundwater allocations to the City;
- Contributing to increased efficiency by funding City water conservation programs;
- Funding recycled water retrofit projects; or
- Providing additional water supplies.

HYDRO-3: The RSD shall develop and implement an evacuation plan to be implemented in conjunction with the County of Ventura OES Dam Failure Response Plan.

3.10.2.6 Level of Impact After Mitigation

With implementation of Mitigation Measures HYDRO-1 through HYDRO-3, project impacts would be less than significant.

3.11 LAND USE AND PLANNING

This section describes the proposed project's potential land use and planning impacts based on whether the proposed project would conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As noted in the Initial Study (Appendix A), potential project impacts associated with physically dividing an established community were found to be less than significant and are not discussed further in the EIR.

3.11.1 Environmental Setting

3.11.1.1 Existing Conditions

The project Site is located in unincorporated Ventura County, California. The existing RDV main campus is outside of the Oxnard-Camarillo Greenbelt and the Ventura County SOAR boundary, but within the City of Oxnard's SOI and CURB; the northern campus and southern expansion areas are the opposite (i.e., within the Oxnard-Camarillo Greenbelt and Ventura County SOAR boundaries, and outside of the City of Oxnard SOI and CURB).

The existing main campus has a Ventura County General Plan land use and zoning designation of RE-20,000 SF; the northern campus and southern expansion areas have a Ventura County General Plan land use and zoning designations of AE-40 ac/MRP. The City of Oxnard General Plan land use designation for the existing campus is School; the designation for the northern campus and southern expansion area is Agriculture.

The project Site is relatively flat and currently used as a middle school (existing campus) or for agriculture (northern and southern expansion areas). It is surrounded by adjacent residential and agricultural uses to the north, agricultural land to the east, commercial (car dealerships) to the south, and residential uses to the west. The agricultural land to the east is also located within the Ventura-Oxnard Greenbelt. The primary access to the main campus is off Rose Avenue.

3.11.1.2 Regulatory Setting

Federal

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

State

Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code Section 56000 et seq.)

State law provides for LAFCOs to be formed as independent agencies in each county in California. LAFCOs implement state law requirements and state and local policies relating to boundary changes for cities and most special districts, including SOI, incorporations, annexations, reorganizations, and other changes of organization. In this capacity, the Ventura LAFCo is the boundary agency for cities and most special districts in Ventura County (LAFCo 2022b).

Local

Ventura LAFCo Commissioner's Handbook

The current version of the Ventura LAFCo Commissioner's Handbook, with updates through July 20, 2022, provides the following description:

The Ventura Local Agency Formation Commission ("LAFCo") was formed and operates under the provisions of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 ("CKH") (California Government Code Section 56000 et seq.). This law provides for LAFCOs to be formed

as independent agencies in each county in California. LAFcos implement state law requirements and state and local policies relating to boundary changes for cities and most special districts, including SOI, incorporations, annexations, reorganizations and other changes of organization. In this capacity, the Ventura LAFco is the boundary agency for cities and most special districts in Ventura County.

The CKH requires each LAFco to adopt written policies and procedures. Other provisions of State law require LAFcos to adopt written policies and guidelines applicable to specialized functions (e.g., the CEQA, Conflict of Interest, etc.). In addition, the Ventura LAFco has adopted By-Laws and other operational and procedural policies to facilitate its operation and provide public information.

The Commissioner's Handbook is a compilation of all of the written policies and procedures adopted by the Ventura LAFco. These policies and procedures do not reiterate or interpret state law. Rather, they are intended to supplement state law. To fully understand LAFco processes and procedures, applicable provisions of state law should be reviewed in conjunction with this EIR.

City of Oxnard 2030 General Plan

The City of Oxnard 2030 General Plan contains the goals and policies that are intended to guide a wide range of public and private development decisions through 2030. A city's General Plan is a comprehensive and long-range plan for its physical development. The choice of the planning horizon is up to each city but is usually at least 20 years. The 2030 Oxnard General Plan sets out a vision to guide future development in the City to the year 2030. The 2030 General Plan includes the seven state-required elements that were required at the time of adoption (land use, circulation, housing, open space, conservation, safety, and noise) within five chapters, each divided into two parts: (1) Background and (2) Goals and Objectives. The City of Oxnard has produced a Background Report as well as a Goals and Objectives document. The Background Report was completed in 2006 and presented a detailed description of the City and the Planning Area in a wide range of topic areas. The Goals and Policies document contains the actions (i.e., policies) needed to achieve the vision expressed in terms of specific goals. The Goals and Policies document is divided into nine chapters. Each chapter contains an introduction, definitions, and goals and policies numbered according to the topic they address. The Goals and Policies document is intended to be used as a decision-making tool for City officials in day-to-day and long-term strategic planning and operations.

Ventura County 2040 General Plan and El Rio/Del Norte Area Plan

Similar to the City of Oxnard's General Plan, the Ventura County 2040 General Plan is a comprehensive and long-range plan for its physical development and contains the goals and policies that are intended to guide a wide range of public and private development decisions through 2040. The 2040 General Plan includes the nine elements currently required by the State (land use, circulation, housing, conservation, open space, noise, safety, air quality, and environmental justice) organized listed above within nine chapters and was adopted on September 15, 2020. The County of Ventura also completed a Background Report that was adopted simultaneously with the General Plan.

The General Plan also included an updated El Rio/Del Norte Area Plan that includes the following description:

"The El Rio/Del Norte Area Plan is an integral part of the Ventura County General Plan, functioning as the land use plan for approximately 6,984 acres of unincorporated land adjacent to the City of Oxnard and within the City of Oxnard SOI. "Area plan" is a term for plans that focus on a particular region or community within the overall general plan area. Area plans refine the policies of the General Plan as they apply to a smaller geographic area and are designed to reflect the needs and desires of those individual communities. In general, the purpose of this Area Plan is to specify the distribution, location, types and intensity of land uses within a prescribed area, as well as provide specific policies concerning development in that area. The Ventura County General Plan is the plan

by which the unincorporated portions of Ventura County will develop in the future. Pursuant to State law, all principles, goals, objectives, policies, and plan proposals set forth in an area plan must be consistent with the countywide general plan. To achieve this consistency, the County reviewed and used the goals, policies, programs and maps of the Ventura County General Plan in drafting this Area Plan. Since the Countywide General Plan applies to the El Rio/Del Norte area, repetition of materials from the General Plan has not been included in the Area Plan. The goals, policies and programs which have been incorporated into this Area Plan are intended to supplement the Countywide General Plan, therefore, this Plan is intended to be read in conjunction with the Countywide General Plan.”

Oxnard-Camarillo Greenbelt Agreement

In 1984, the City of Oxnard (Resolution No. 8616), County of Ventura (Board of Supervisors Resolution No. 222), and City of Camarillo (Resolution No. 84-9) approved the Oxnard-Camarillo Greenbelt Agreement. The agreement established a Greenbelt intended for long-term agricultural use that generally cannot be converted to urban development without voter approval or amending the agreement. This greenbelt largely defines the City of Oxnard's northeast and east boundaries.

City of Oxnard Urban Restriction Boundary (CURB) and County of Ventura and City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinances

In 1998, the voters of the City of Oxnard adopted the SOAR initiative establishing the CURB and re-designating as “Agriculture (AG)” all land previously designated “Agricultural Planning Reserve (AG/PR).” CURB defined the urban development boundary for the City of Oxnard until December 31, 2020. In 2016, City of Oxnard voters passed an initiative to extend the CURB to 2050.

The SOAR initiative also established a CBB which lies outside of the CURB line and is coterminous with the Oxnard Area of Interest. Changes to the CURB line or an agricultural land use designation within the CBB generally requires majority approval of Oxnard voters, with certain exceptions, including but not limited to an exception to allow up to 20 acres per year to be brought into the CURB for affordable housing needed to meet the City's RHNA target production. The City of Oxnard 2030 General Plan expressly preserves these SOAR requirements.

Like the City of Oxnard's SOAR ordinance, the County of Ventura's SOAR ordinance was also passed in the 1990s and has since been extended to 2050. Unlike the City of Oxnard's SOAR ordinance, however, the County of Ventura's SOAR ordinance requires a majority vote of the people to rezone unincorporated open space, agricultural, or rural land for development.

3.11.2 Impact Analysis

3.11.2.1 Methodology

The evaluation for potential impacts related to land use and planning is based on a review of the proposed project, including the proposed land use or activity and the size, density and intensity of the operation, for consistency with relevant land use plans and studies, including the Ventura LAFCo Commissioner's Handbook (Ventura LAFCo 2022a); the City of Oxnard 2030 General Plan (City of Oxnard 2016); the Ventura County 2040 General Plan (Ventura County 2020c); and the Greenbelt Agreement between the City of Oxnard, City of Camarillo, and the County of Ventura (City of Oxnard, County of Ventura, and City of Camarillo 1984). Table 3-17 identifies the existing and proposed status of each project attribute analyzed in Section 3.11.2.3, *Project Impacts*, as well as the impact analysis subsection containing the relevant discussion.

Table 3-17. Land Use Project Impacts

Project Attribute	Parcel			Approvals Required	Land Use Impact Analysis Sub-Section
	Existing Main Campus (144-0-110-445)	Northern Campus Expansion Area (144-0-110-225 [Portion])	Southern Campus Expansion Area (144-0-110-590 [Portion])		
Jurisdiction	<u>Current:</u> Ventura County <u>Proposed:</u> City of Oxnard	<u>Current:</u> Ventura County <u>Proposed:</u> City of Oxnard	<u>Current:</u> Ventura County <u>Proposed:</u> City of Oxnard	City of Oxnard Ventura LAFCo	LAFCo Actions
Ventura County General Plan Land Use Designation	<u>Current:</u> RE-20,000 S.F. <u>Proposed:</u> N/A	<u>Current:</u> AE-40 ac/MRP <u>Proposed:</u> N/A	<u>Current:</u> AE-40 ac/MRP <u>Proposed:</u> N/A	N/A	
City of Oxnard General Plan Land Use Designation	<u>Current:</u> School <u>Proposed:</u> School	<u>Current:</u> Agriculture <u>Proposed:</u> School	<u>Current:</u> Agriculture <u>Proposed:</u> School	City of Oxnard	City of Oxnard 2030 General Plan and Zoning
Zoning Designation	<u>Current (Ventura County):</u> RE-20,000 S.F. <u>Proposed (City of Oxnard):</u> Community Reserve (C-R)	<u>Current (Ventura County):</u> AE-40 ac/MRP <u>Proposed (City of Oxnard):</u> C-R	<u>Current (Ventura County):</u> AE-40 ac/MRP <u>Proposed (City of Oxnard):</u> C-R	City of Oxnard	
Oxnard-Camarillo Greenbelt	<u>Current:</u> Outside <u>Proposed:</u> Outside	<u>Current:</u> Within <u>Proposed:</u> Outside	<u>Current:</u> Within <u>Proposed:</u> Outside	City of Camarillo, City of Oxnard, County of Ventura	Oxnard-Camarillo Greenbelt Agreement Map Amendment
Water District	<u>Current:</u> On-Site well United Water Conservation District City of Oxnard	<u>Current:</u> Agricultural Well Water <u>Proposed:</u> Calleguas Municipal Water District	<u>Current:</u> Agricultural Well Water <u>Proposed:</u> Calleguas Municipal Water District	Annexation Request to: Calleguas Municipal Water District, Ventura LAFCo	LAFCo Actions

Project Attribute	Parcel			Approvals Required	Land Use Impact Analysis Sub-Section
	Existing Main Campus (144-0-110-445)	Northern Campus Expansion Area (144-0-110-225 [Portion])	Southern Campus Expansion Area (144-0-110-590 [Portion])		
	<u>Proposed</u> : Calleguas Municipal Water District				
City of Oxnard Sphere of Influence (SOI)	<u>Current</u> : Within <u>Proposed</u> : Within	<u>Current</u> : Outside <u>Proposed</u> : Within	<u>Current</u> : Outside <u>Proposed</u> : Within	Ventura LAFCo	LAFCo Actions
City of Oxnard City Urban Growth Boundary (CURB)	<u>Current</u> : Within <u>Proposed</u> : Within	<u>Current</u> : Outside <u>Proposed</u> : Within	<u>Current</u> : Outside <u>Proposed</u> : Within	City of Oxnard, Ventura LAFCo	LAFCo Actions
City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinance	<u>Current</u> : N/A <u>Proposed</u> : Outside	<u>Current</u> : N/A <u>Proposed</u> : Outside	<u>Current</u> : N/A <u>Proposed</u> : Outside	Exempt	County of Ventura and City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinances
County of Ventura SOAR Ordinance	<u>Current</u> : Outside <u>Proposed</u> : N/A	<u>Current</u> : Within <u>Proposed</u> : N/A	<u>Current</u> : Within <u>Proposed</u> : N/A	N/A	

Notes: LAFCo Local Agency Formation Commission
N/A Not Applicable

3.11.2.2 Significance Thresholds

The thresholds for land use impacts used in this analysis are consistent with Appendix G of the 2022 CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines.

Consistent with Appendix G of the 2022 CEQA Guidelines, the proposed project would result in a significant impact if it were to:

- *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.*

Consistent with the 2017 City of Oxnard CEQA Guidelines, an affirmative answer to any of the following questions typically indicates a significant land use impact. A “no” response to all questions indicates that there would be no significant impact with respect to land use.

- *Would the project conflict with an applicable land use plan, policy or regulation of the City or other agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating a significant environmental effect?⁴*
- *Would the project involve land uses that are not allowed under an applicable airport land use compatibility plan?*
- *Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?*
- *Would the project physically divide an established community?*

Addressing the CEQA Guideline listed above will simultaneously address the City of Oxnard's Threshold 1. With respect to City of Oxnard Thresholds 2 and 3, the project is not located within an applicable airport land use compatibility plan, habitat conservation plan, or natural community conservation plan. With respect to Threshold 4, and as noted in the Initial Study (Appendix A), potential proposed project impacts associated with physically dividing an established community were found to be less than significant. Therefore, City of Oxnard Thresholds 1–4 will not be discussed further in the EIR.

3.11.2.3 Project Impacts

Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

LAFCo Actions

The proposed project would require annexation into the City of Oxnard, with associated SOI and CURB growth boundary amendments, all of which would require LAFCo approval. The proposed changes of organization are collectively called “reorganization.” The following LAFCo actions would be necessary components of the reorganization.

- Annexation of all three proposed project parcels to the City of Oxnard.

⁴ The 2017 City of Oxnard CEQA Guidelines also includes the following statement:

With respect to Threshold 1, formally adopted land use plans, policies, and regulations must be considered and inconsistencies with adopted policies may be considered significant environmental effects. Consistency with draft plans, policies, and regulations that have not yet been adopted may also be discussed in CEQA documents for informational purposes, but inconsistencies with such plans, policies, and regulations typically would not be considered significant effects.

- Annexation of all three proposed project parcels to CMWD.
- Amendment of the City of Oxnard's SOI to include the northern and southern campus expansion areas.
- Amendment of the City of Oxnard CURB to include the northern and southern campus expansion areas.

The District will process a GPA, RZ, and a Reorganization and SOI amendments through the City of Oxnard. The proposed project will be required to be reviewed and recommended for approval to the City Council by the Planning Commission at a noticed public hearing prior to the City Council's public hearing process and final action. If the project is approved by the City Council, the City will file a Resolution of Annexation with LAFCo. Upon approval of the reorganization and SOI amendments by LAFCo, and a 30-day reconsideration period, the reorganization will be recorded, and the project Site will be annexed into the City of Oxnard and the CMWD and eligible for all public services. Discussion of project consistency with relevant LAFCo policies is provided in Tables 3-18 through 3-20.

Table 3-18. LAFCo Consistency Analysis (Division 3: Changes of Organization and Reorganization)

Policy	Discussion
Division 3: Changes of Organization and Reorganization	
<i>Chapter 1: General Policies</i>	
<u>Section 3.1.6: Discretionary Approvals Required.</u> Unless exceptional circumstances exist, no application for a change of organization or reorganization will be accepted until all discretionary approvals for any pending application for land use entitlements, including land divisions, pertaining to the subject territory are granted.	As described in this EIR, the RSD will obtain all discretionary approvals required prior to submitting an application to LAFCo (refer to Table 2-5). Therefore, the proposed project will be consistent with this policy.
<i>Chapter 2: Specific Policies</i>	
<u>Section 3.2.2: Annexation to the City of Oxnard and CMWD.</u> Any annexation to the City of Oxnard shall only be considered and approved if the subject territory is already within the CMWD or is approved concurrently with an annexation to the CMWD, unless it is clearly demonstrated that the subject territory has no foreseeable need for potable water service. For the purpose of this policy in making the determination that the subject territory will have no foreseeable need for potable water service, the Commission will consider the following factors: <ol style="list-style-type: none"> The territory is subject to a deed restriction that permanently limits the use to agriculture or open space uses that do not require any potable water service. The territory is owned by a public agency and used for public utility or open space uses that do not require any potable water service. CMWD requests that annexation not occur as the CMWD cannot provide timely service to subject territory. 	Annexation to the City of Oxnard and the CMWD is proposed to occur concurrently as part of the proposed project. Therefore, the proposed project will be consistent with this policy.

Policy	Discussion
<p><u>Section 3.2.4.1 Consistency with General and Specific Plans:</u></p> <p>a. In its review of a proposal, LAFCo shall consider consistency with city and/or county general and specific plans.</p> <p>b. Unless exceptional circumstances are shown, LAFCo will not approve a proposal unless it is consistent with the applicable general plan and any applicable specific plan. For purposes of this policy, the applicable general plan is as follows:</p> <ul style="list-style-type: none"> i. For proposals by a city, the general plan of the city. ii. For proposals by a district, where the affected territory lies within an adopted SOI of a city, the general plan of the city. iii. For proposals by a district, where the affected territory lies outside an adopted city SOI, the Ventura County General Plan. 	<p>The RSD would process a General Plan Amendment (GPA), Pre-Zone (RZ) and a Reorganization and SOI amendments through the City of Oxnard. The proposed General Plan land use designation is School, and the proposed zoning designation is Community Reserve (C-R). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with the General Plan and zoning land use designations. An analysis of the proposed project's consistency with the General Plans for the County of Ventura (for the northern and southern campus expansion areas), and the City of Oxnard (for the existing main campus) is provided further below in Tables 3-20 and 3-21, respectively.</p>
<p><u>Section 3.2.4.2 Consistency with Ordinances Requiring Voter Approval:</u></p> <p>For cities that have enacted ordinances that require voter approval for the extension of services or for changing general plan designations, LAFCo will not approve a proposal unless it is consistent with such ordinances and voter approval has first been granted, or unless exceptional circumstances are shown to exist.</p>	<p>As described in Section 3.11.2.3 of this EIR, the proposed project is either exempt from ordinances requiring voter approval for the extension of services or for changing general plan designations, or such ordinances are not applicable to the proposed project. Therefore, the proposed project will be consistent with this policy.</p>
<p><u>Section 3.2.4.3 Guidelines for Orderly Development:</u></p> <p>LAFCo encourages proposals that involve urban development or that result in urban development to include annexation to a city wherever possible. In support of this policy LAFCo has adopted Guidelines for Orderly Development, the policies of which are incorporated by reference (see Appendix A of the LAFCo handbook).</p>	<p>The proposed project is consistent with applicable guidelines provided in Appendix A of the LAFCo handbook. For example, the RSD is applying to the City of Oxnard for all applicable permits and approvals, as applicable; land will be annexed to the City prior to being developed for urban purposes, and annexation to the City prevents the expansion of existing County service areas. Therefore, the proposed project will be consistent with this policy.</p>
<p><u>Section 3.2.4.4 Greenbelts:</u> The County of Ventura and various cities in the County have adopted Greenbelt Agreements for the purposes of preserving agriculture and/or open space, providing separation between cities, and/or limiting the extension of urban services. The Ventura LAFCo is not a direct party to these Greenbelt Agreements but has endorsed them as statements of local policy. As such, LAFCo will not approve a proposal from a city that is in conflict with any Greenbelt Agreement unless exceptional</p>	<p>The northern and southern campus expansion areas are located within the greenbelt established by the 1984 "Joint Resolution of the City Councils of the City of Camarillo and the City of Oxnard and the County of Ventura Establishing a Greenbelt Between North and South of the Two Cities." As part of the proposed project, the RSD is requesting that this agreement be amended. Specifically, the map is to be amended to exclude the proposed northern and southern campus expansion areas. If the requested amendment is approved by all</p>

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circumstances are shown to exist. LAFCo encourages that Greenbelt Agreements be amended by all parties involved prior to the filing of any proposal that may be in conflict with the Agreements.	parties (City of Camarillo, City of Oxnard, County of Ventura), then the proposed project would be consistent with this policy.
<i>Chapter 3: Standards</i>	
<u>Section 3.3.1: General Standards for Annexation to Cities and Districts</u>	
<u>Section 3.3.1.1 Factors Favorable for Approval:</u>	
a) The proposal would eliminate islands, corridors, or other distortion of existing boundaries.	While the proposal would create a small peninsula in the City of Oxnard boundary in the immediate vicinity of the project Site, it would eliminate a peninsula in the City of Oxnard's SOI, as described below. Furthermore, by incorporating the existing main campus and imminent development on the southern campus expansion area (see discussion of item "b"), the proposed project would also improve consistency with Section 3.2.4.3, which encourages "proposals that involve urban development or that result in urban development to include annexation to a city wherever possible," as discussed above. As such, the proposed project can be viewed as an incremental step toward achieving the goals of Section 3.2.4.3. Moreover, the small City boundary "peninsula" that would be created would have little additional impact given the shape of the existing City Boundary. Therefore, the proposed project will be consistent with this policy.
b) The affected territory is urban in character or urban development is imminent, requiring municipal or urban-type services.	The existing main campus is urban in character, and urban development in the southern campus expansion area is imminent to alleviate inadequate parking and traffic congestion associated with the existing main campus. "Development" in the northern campus expansion area is limited to converting the existing agricultural use to an educational use (for agriculture), and the potential development of a small number of supporting structures and instructional area. Furthermore, inclusion of the northern campus expansion area is consistent with other policies described herein. Therefore, the proposed project will be consistent with this policy.
c) The affected territory can be provided all urban services by the city or district as shown by the city or district's service plans and the proposal would enhance the efficient provision of urban services.	All three parcels can be provided with all urban services by the City of Oxnard, the CMWD, and the District, as appropriate. Including all three parcels within the City of Oxnard City limits, and concurrently annexing them into the CMWD, would enhance the efficient provision of urban services. Therefore, the proposed project will be consistent with this policy.

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d) The proposal is consistent with state law, adopted spheres of influence, applicable general and specific plans, and these policies.	As described in this section (3.11.2, <i>Impact Analysis</i>), with approval of the proposed project, amendments, and annexations, the proposed project would be consistent with applicable general and specific plans and LAFCo policies. Therefore, the proposed project will be consistent with this policy.
e) The proposal is for the annexation of city- or district-owned property, used or to be used for public purposes.	The proposed project would be public school facilities to meet the educational needs of RSD students. Therefore, the proposed project will be consistent with this policy.
<u>Section 3.3.1.2 Factors Unfavorable to Approval:</u>	
a) The proposal would create or result in corridors, peninsulas, or flags of city or district area or would otherwise cause or further the distortion of existing boundaries.	While the proposed project would create a small peninsula in the City of Oxnard boundary in the immediate vicinity of the project Site, it would eliminate a peninsula in the City of Oxnard's SOI, as described below. Furthermore, by incorporating the existing main campus and imminent development on the southern campus expansion area (see discussion of item "b" below), the proposed project would also improve consistency with Section 3.2.4.3, which encourages "proposals that involve urban development or that result in urban development to include annexation to a city wherever possible," as discussed above. As such, the proposed project can be viewed as an incremental step toward achieving the goals of Section 3.2.4.3. Moreover, the small City boundary "peninsula" that would be created would have little additional impact given the shape of the existing City Boundary. Therefore, the proposed project will be consistent with this policy.
b) The proposal would result in a premature intrusion of urbanization into a predominantly agricultural or rural area.	The proposed project would not result in premature intrusion of urbanization. The existing main campus parcel is urbanized. The proposed project would convert existing agricultural lands to educational uses on the southern campus expansion area, but development is imminent given ongoing issues related to parking and traffic. Furthermore, the northern campus expansion area would continue to be used for agricultural purposes, albeit with an educational component. Therefore, the proposed project will be consistent with this policy.
c) The proposal is inconsistent with state law, adopted spheres of influence, adopted general or specific plans, adopted habitat conservation and/or restoration plans, other applicable plans adopted by any governmental agency, or these policies.	As described in this section (3.11.2, <i>Impact Analysis</i>), with approval of the proposed project, amendments, and annexations, the proposed project would be consistent with applicable general and specific plans and LAFCo policies. Therefore, the proposed project will be consistent with this policy.

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d) For reasons of topography, distance, natural boundaries, or like considerations, the extension of services would be financially infeasible, or another means of supplying services by acceptable alternatives is preferable.	Extension of services is anticipated to be financially feasible. The proposed project includes the existing main campus and lands adjacent to it. The proposed project has been designed to minimize cost and ensure feasibility. No other alternatives are preferable. Therefore, the proposed project will be consistent with this policy.
e) Annexation would encourage a type of development in an area that due to terrain, isolation, or other economic or social reason, is not in the public interest.	The project Site is flat, topographically contiguous, and not isolated. Annexation would not encourage a type of development that is not in the public interest. Therefore, the proposed project will be consistent with this policy.
f) The proposal appears to be motivated by inter-agency rivalry or other motives not in the public interest.	RSD is proposing new educational facilities to meet the current and anticipated future enrollment demand. New public schools are typically considered a public benefit. Therefore, the proposed project will be consistent with this policy.
g) The proposed boundaries do not include logical service areas or are otherwise improperly drawn.	The proposed boundaries allow the City of Oxnard, and its SOI, to be contiguous in the vicinity of the project Site and are not improperly drawn. Therefore, the proposed project will be consistent with this policy.
h) The proposal area would accommodate new development and includes a tsunami inundation zone, wildfire hazard zone, FEMA designated floodway or floodplain, or other hazardous area designated by federal, state, or local public agencies, unless the Commission determines that the hazard or hazards can be adequately mitigated.	The proposed project is not located within a tsunami inundation zone, wildfire hazard zone, 100-year floodplain, or other hazardous area. Therefore, the proposed project will be consistent with this policy.
i) The proposal will result in an unacceptable significant adverse impact(s) to the environment as determined by the Commission.	Potential impacts associated with construction and operation of the proposed project are evaluated in this EIR. When warranted and feasible, mitigation measures are identified to reduce proposed project impacts. Impacts found to be significant and unavoidable in this EIR include agricultural conversion (project level and cumulative). The amount of active agricultural acreage to be converted to non-agricultural uses is small, approximately 10.8 acres. Mitigation Measure AG-1 is provided to mitigate for the loss of important farmland. Nonetheless, conversion of agricultural land would remain a significant and unavoidable impact. As a responsible agency, LAFCo will evaluate whether potential impacts associated with the proposed project would be acceptable or not when making their decisions. Therefore, the proposed project will be consistent with this policy.

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<p><i>Section 3.3.5: Agriculture and Open Space Preservation</i></p> <p><u>3.3.5.1: Findings and Criteria for Prime Agricultural and Existing Open Space Land Conversion:</u></p> <p>LAFCo will approve a proposal for a change of organization or reorganization which is likely to result in the conversion of prime agricultural or existing open space land use to other uses only if the Commission finds that the proposal will lead to planned, orderly, and efficient development. For the purposes of this policy, a proposal for a change of organization or reorganization leads to planned, orderly, and efficient development only if all of the following criteria are met:</p> <ol style="list-style-type: none"> The territory involved is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development. The territory is likely to be developed within 5 years and has been pre-zoned for nonagricultural or open space use. In the case of very large developments, annexation should be phased wherever possible. Insufficient non-prime agricultural or vacant land exists within the existing boundaries of the agency that is planned and developable for the same general type of use. The territory involved is not subject to voter approval for the extension of services or for changing general plan land use designations. Where such voter approval is required by local ordinance, such voter approval must be obtained prior to LAFCo action on any proposal unless exceptional circumstances are shown to exist. The proposal will have no significant adverse effects on the physical and economic integrity of other prime agricultural or existing open space lands. 	
	<p>a) Urban uses are adjacent to the southern campus expansion area's northern, western, and southern border.</p> <p>The existing main campus is an urban use.</p> <p>Urban uses are adjacent to the northern campus expansion area's western and southern border.</p> <p>b) The existing main campus is already developed. The southern campus expansion area is likely to be developed within the next five years to alleviate existing traffic and parking issues and would be pre-zoned for such with approval of the General Plan Amendment and Pre-zoning request. The northern campus expansion area will remain largely undeveloped and utilized for educational purposes related to agriculture even with approval of the General Plan Amendment and Pre-zoning request.</p> <p>c) Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded RDV campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety. One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost effective option.</p> <p>d) The northern campus and southern campus expansion areas are not located within the City of Oxnard's SOI or the CURB. However, no component of</p>

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	<p>the proposed project is subject to voter approval as the City of Oxnard's CURB ordinance exempts school expansions from requiring such approval.</p> <p>e) Please refer to the agricultural discussion in Section 3.2 of this EIR for an evaluation of potential impacts related to agricultural resources. The proposed project will not have a significant adverse effect on the physical and economic integrity of other prime agricultural or existing open space lands outside of the project Site. Therefore, the proposed project will be consistent with this policy.</p>
<p><u>3.3.5.2: Findings that Insufficient Non-Prime Agricultural or Vacant Land Exists:</u></p> <p>The Commission will not make affirmative findings that insufficient non-prime agricultural or vacant land exists within the boundaries of the agency unless the applicable jurisdiction has prepared a detailed alternative site analysis which at a minimum includes:</p> <ol style="list-style-type: none"> An evaluation of all vacant, non-prime agricultural lands within the boundaries of the jurisdiction that could be developed for the same or similar uses. An evaluation of the re-use and redevelopment potential of developed areas within the boundaries of the jurisdiction for the same or similar uses. Determinations as to why vacant, non-prime agricultural lands and potential re-use and redevelopment sites are unavailable or undesirable for the same or similar uses, and why conversion of prime agricultural or existing open space lands are necessary for the planned, orderly, and efficient development of the jurisdiction. 	<p>a-c) Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety.</p> <p>One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost-effective option.</p> <p>As discussed in Section 3.2 of this EIR, implementation of the proposed project would result in the conversion of agricultural land into educational uses, resulting in a significant, unavoidable, and permanent loss of 8.2 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. No feasible mitigation measures were available to reduce the impact to a less than significant level. However, Mitigation Measure AG-1 is proposed to reduce the potential impact through offering</p>

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	<p>the top 12-inches of the Prime Farmland and Farmland of Statewide importance soils from the southern campus expansion area for relocation to a farm site or farm sites. The proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east. Furthermore, the northern campus expansion area would continue to be used for agricultural purposes, albeit with an educational component.</p>
<p><u>3.3.5.3: Impacts on Adjoining Prime Agricultural or Existing Open Space Lands:</u></p> <p>In making the determination whether conversion will adversely impact adjoining prime agricultural or existing open space lands, the Commission will consider the following factors:</p> <ol style="list-style-type: none"> The prime agricultural and open space significance of the territory and adjacent areas relative to other agricultural and existing open space lands in the region. The economic viability of the prime agricultural lands to be converted. The health and well-being of any urban residents adjacent to the prime agricultural lands to be converted. The use of the territory and the adjacent areas. Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of prime agricultural or existing open space land outside of the agency's sphere of influence or will be extended through prime agricultural or existing open space lands outside the agency's sphere of influence. Whether natural or man-made barriers serve to buffer prime agricultural or existing open space lands outside of the agency's sphere of influence from the effects of the proposal. Applicable provisions of local general plans, applicable ordinances that require voter approval prior to the extension of urban services or changes to general plan designations, Greenbelt Agreements, applicable growth-management policies, and statutory provisions designed to protect agriculture or existing open space. 	<p>a-b) As discussed in Section 3.2 of this EIR, the 9 acres of Prime Farmland and 0.9 acres as Farmland of Statewide Importance found in the approximately 10-acre northern campus expansion area will not be converted to a non-agricultural use. Implementation of the proposed project would result in the conversion of agricultural land in the southern campus expansion area, resulting in a significant, unavoidable, and permanent loss of 8.2 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. No feasible mitigation measures were available to reduce the impact to a less than significant level. However, Mitigation Measure AG-1 is proposed to reduce the potential impact, and the proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east.</p> <p>c) Given the proposed improvements that would reduce existing parking and circulation issues, as well as the additional recreation facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, physical education [P.E.] and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) that would be available to the public outside of school hours, the health and well-being of urban residents adjacent to the prime agricultural lands to be converted would be improved.</p> <p>d) Except for the parking and circulation improvements noted above, the use of the territory and adjacent areas would remain unchanged.</p> <p>e) The proposed project is not sized, extended, or situated to facilitate the conversion of prime agricultural</p>

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<p>h. Comments and recommendations by the Ventura County Agricultural Commissioner.</p>	<p>or existing open space land outside of the agency's sphere of influence. As described in the response to a-b, above, the proposed project is designed to reduce impacts to off-Site agricultural lands.</p> <p>f) The existing main campus of the project Site has been developed with a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. The project is also designed to minimize impacts to adjacent agricultural uses. For example, the northern campus expansion area will remain largely for agricultural and educational purposes. The proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east. Therefore, the proposed project includes design features to buffer prime agricultural or existing open space lands outside of the agency's sphere of influence from the effects of the proposal.</p> <p>g) As described within this EIR, applicable ordinances require voter approval. Furthermore, if all proposed amendments are approved by all jurisdictions with approval authority, then the proposed project would be consistent with this policy.</p> <p>h) Comments and recommendations by the Ventura County Agricultural Commissioner will be sought as part of the project approval process.</p>
<p><u>3.3.5.4: Territory Subject to a Land Conservation Act (Williamson Act) Contract:</u></p> <p>LAFCo will not approve a proposal which includes the annexation of territory subject to an active Land Conservation Act contract to a city or special district that provides or would provide facilities and/or services other than those that support the land uses that are allowed under the contract. For purposes of this section, an active Land Conservation Act contract includes a contract for which a notice of non-renewal has been filed.</p>	<p>Neither of the two campus expansion areas are subject to a Williamson Act contract. Therefore, the proposed project will be consistent with this policy.</p>

Table 3-19. LAFCo Consistency Analysis (Division 4: Spheres of Influence)

Division 4: Spheres of Influence	
<i>Chapter 1: General Policies</i>	
<p><u>Section 4.1.3.2 Conformance with Lines of Ownership and Assessment.</u></p> <p>Sphere of Influence boundaries should coincide with lines of assessment or ownership. If sphere of influence boundaries do not coincide with lines of assessment or ownership, they shall be described by metes and bounds legal descriptions sufficient for definitive mapping purposes using geographic information system software.</p>	<p>The proposed SOI boundaries coincide with lines of assessment or ownership. Therefore, the proposed project will be consistent with this policy.</p>
<i>Chapter 3: Standards for Determining, Updating and Amending Sphere of Influence Boundaries</i>	
<u>Section 4.3.1 General Standards:</u>	
<p><u>Section 4.3.1.1 LAFCo Favors Sphere of Influence Boundaries that:</u></p> <p>a. Coincide with existing and planned service areas.</p> <p>b. Follow natural and man-made features, such as ridge lines, drainage areas, watercourses, and edges of ROW, provided they coincide with lines of assessment or ownership, or are described by metes and bounds legal descriptions which can be used easily for mapping boundaries.</p> <p>c. Include adjacent urbanized areas which are receiving or which may require urban services, such as public water and/or sewer services.</p>	<p>a. The proposed SOI adjustments would include the main campus, and the proposed northern and southern campus expansion areas within the SOI. The main campus is an existing, developed service area, and with approval of the Master Plan, the northern and southern campus expansion areas would become planned service areas.</p> <p>b. The proposed SOI adjustments would coincide with lines of assessment or ownership.</p> <p>c. The proposed SOI adjustments include adjacent urbanized areas which are, or may require, urban services. The proposed project also includes annexation into the CMWD.</p> <p>Therefore, the proposed project will be consistent with this policy.</p>
<p><u>Section 4.3.1.2 LAFCo Discourages Sphere of Influence Boundaries that:</u></p> <p>a. Split neighborhoods or divide an existing identifiable community, commercial district, or other area having a social and economic identity.</p> <p>b. Create areas where it is difficult to provide services.</p> <p>c. Result in islands, peninsulas, flags, “cherry stems,” or other unusual physical shapes that could cause, or further, the distortion of boundaries.</p> <p>d. Would accommodate new development and include a tsunami inundation zone, wildfire hazard zone, FEMA designated floodway or floodplain, or other hazardous area designated by federal, state, or local public agencies, unless the Commission determines that the hazard or hazards can be adequately mitigated.</p>	<p>a. The proposed SOI boundaries would not split neighborhoods or divide an existing, identifiable community, commercial district, or other area having a social and economic identity. The existing campus serves nearby residents within both unincorporated Ventura County and within the City of Oxnard and would continue to do so.</p> <p>b. The proposed SOI boundaries would not create areas where it is difficult to provide services. The main campus already receives services and annexation into the CMWD is consistent with other policies and would make it easier to provide services.</p> <p>c. The main campus is already within the existing SOI. Approving the project as proposed within the southern campus expansion area would eliminate a boundary distortion, as this parcel is currently outside of the City of Oxnard’s SOI and is surrounded on three sides by the SOI. Approving the project as proposed within the northern</p>

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campus expansion area would neither eliminate, nor create, a boundary distortion as it would be contiguous with the SOI on two sides.

d. The proposed project is not located within a tsunami inundation zone, wildfire hazard zone, 100-year floodplain, or other hazardous area. Therefore, the proposed project will be consistent with this policy.

Therefore, the proposed project will be consistent with this policy.

Section 4.3.2 Agricultural and Open Space Preservation:

4.3.2.1: Findings and Criteria for Prime Agricultural and Existing Open Space Land Conversion:

LAFCo will approve sphere of influence amendments and updates which are likely to result in the conversion of prime agricultural or existing open space land use to other uses only if the Commission finds that the amendment or update will lead to planned, orderly, and efficient development. For the purposes of this policy, a sphere of influence amendment or update leads to planned, orderly, and efficient development only if all of the following criteria are met:

- a. The territory is likely to be developed within 5 years and has been designated for nonagricultural or open space use by applicable general and specific plans.
- b. Insufficient non-prime agricultural or vacant land exists within the sphere of influence of the agency that is planned and developable for the same general type of use.
- c. The proposal will have no significant adverse effects on the physical and economic integrity of other prime agricultural or existing open space lands.
- d. The territory is not within an area subject to a Greenbelt Agreement adopted by a city and the County of Ventura. If a City proposal involves territory within an adopted Greenbelt area, LAFCo will not approve the proposal unless all parties to the Greenbelt Agreement amend the Greenbelt Agreement to exclude the affected territory.
- e. The use or proposed use of the territory involved is consistent with local plan and policies.

a) The existing main campus is already developed. The southern campus expansion area is likely to be developed within the next five years to alleviate existing traffic and parking issues and would be pre-zoned for such with approval of the General Plan Amendment and Pre-zoning request. The northern campus expansion area will remain largely undeveloped and utilized for educational purposes related to agriculture even with approval of the General Plan Amendment and Pre-zoning request.

b) Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety.

One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost effective option.

c) Please refer to the agricultural discussion in Section 3.2 of this EIR for an evaluation of potential impacts related to agricultural resources. The proposed project will not have

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a significant adverse effect on the physical and economic integrity of other prime agricultural or existing open space lands outside of the project Site. Therefore, the proposed project will be consistent with this policy.

d) The northern and southern campus expansion areas are located within the greenbelt established by the 1984 "Joint Resolution of the City Councils of the City of Camarillo and the City of Oxnard and the County of Ventura Establishing a Greenbelt Between North and South of the Two Cities." As part of the proposed project, the RSD is requesting that this agreement be amended. Specifically, the map is to be amended to exclude the proposed northern and southern expansion campus areas. If the requested amendment is approved by all parties (City of Camarillo, City of Oxnard, County of Ventura), then the proposed project would be consistent with this policy.

e) Upon receipt of the various discretionary approvals required of the proposed project, the use or proposed use of the territory involved would be consistent with local plans and policies.

4.3.2.2: Findings that Insufficient Non-Prime Agricultural or Vacant Land Exists:

The Commission will not make affirmative findings that insufficient non-prime agricultural or vacant land exists within the sphere of influence of the agency unless the applicable jurisdiction has prepared a detailed alternative site analysis which at a minimum includes:

- a. An evaluation of all vacant, non-prime agricultural lands within the sphere of influence and within the boundaries of the jurisdiction that could be developed for the same or similar uses.
- b. An evaluation of the re-use and redevelopment potential of developed areas within the sphere of influence and within the boundaries of the jurisdiction for the same or similar uses.
- c. Determinations as to why non-prime agricultural and vacant lands and potential re-use and redevelopment sites are unavailable or undesirable for the same or similar uses, and why conversion of prime agricultural or existing open space lands are necessary for the planned, orderly, and efficient development of the jurisdiction.

a-c) Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety.

One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost-effective option.

Division 4: Spheres of Influence

As discussed in Section 3.2 of this EIR, implementation of the proposed project would result in the conversion of agricultural land into educational uses, resulting in a significant, unavoidable, and permanent loss of 8.2 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. No feasible mitigation measures were available to reduce the impact to a less than significant level. However, Mitigation Measure AG-1 is proposed to reduce the potential impact through offering the top 12-inches of the Prime Farmland and Farmland of Statewide importance soils from the southern campus expansion area for relocation to a farm site or farm sites. The proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east. Furthermore, the northern campus expansion area would continue to be used for agricultural purposes, albeit with an educational component.

4.3.2.3: Impacts on Adjoining Prime Agricultural or Existing Open Space Lands:

In making the determination whether conversion will adversely impact adjoining prime agricultural or existing open space lands, the Commission will consider the following factors:

- a. The prime agricultural and open space significance of the territory included in the sphere of influence amendment or update relative to other agricultural and existing open space lands in the region.
- b. The economic viability of the prime agricultural lands to be converted.
- c. The health and well-being of any urban residents adjacent to the prime agricultural lands to be converted.
- d. Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of prime agricultural or existing open space land outside of the agency's proposed sphere of influence or will be extended through prime agricultural or existing open space lands outside the agency's proposed sphere of influence.
- e. Whether natural or man-made barriers serve to buffer prime agricultural or existing open space

a-b) As discussed in Section 3.2 of this EIR, the 9 acres of Prime Farmland and 0.9 acres as Farmland of Statewide Importance found in the approximately 10-acre northern campus expansion area will not be converted to a non-agricultural use. Implementation of the proposed project would result in the conversion of agricultural land in the southern campus expansion area, resulting in a significant, unavoidable, and permanent loss of 8.2 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. No feasible mitigation measures were available to reduce the impact to a less than significant level. However, Mitigation Measure AG-1 is proposed to reduce the potential impact, and the proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east.

c) Given the proposed improvements that would reduce existing parking and circulation issues, as well as the additional recreation facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) that would be available to the public outside of school hours, the health and well-being

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lands outside of the agency's sphere of influence from the effects of the proposal.

f. Applicable provisions of local general plans, applicable ordinances that require voter approval prior to the extension of urban services or changes to general plan designations, Greenbelt Agreements, applicable growth-management policies, and statutory provisions designed to protect agriculture or existing open space.

g. Comments and recommendations by the Ventura County Agricultural Commissioner.

of urban residents adjacent to the prime agricultural lands to be converted would be improved.

d) The existing main campus of the project Site has been developed with a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. The proposed project is also designed to minimize impacts to adjacent agricultural uses. For example, the northern campus expansion area will remain largely for agricultural and educational purposes. The proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east. Therefore, the proposed project includes design features to buffer prime agricultural or existing open space lands outside of the agency's sphere of influence from the effects of the proposal.

e) The existing main campus of the project Site has been developed with a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. The project is also designed to minimize impacts to adjacent agricultural uses. For example, the northern campus expansion area will remain largely for agricultural and educational purposes. The proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east. Therefore, the proposed project includes design features to buffer prime agricultural or existing open space lands outside of the agency's sphere of influence from the effects of the proposal.

f) As described within this EIR, applicable ordinances require voter approval. Furthermore, if all proposed amendments are approved by all jurisdictions with approval authority, the proposed project would then be consistent with this policy.

g) Comments and recommendations by the Ventura County Agricultural Commissioner will be sought as part of the project approval process.

4.3.2.4: Territory Subject to a Land Conservation Act (Williamson Act) Contract:

Neither of the two campus expansion areas are subject to a Williamson Act contract. Therefore, the proposed project will be consistent with this policy.

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LAFCo will not approve the inclusion of territory subject to an active Land Conservation Act contract within the sphere of influence of a city or special district that provides or would provide facilities and/or services other than those that support the land uses that are allowed under the contract. For purposes of this section, an active Land Conservation Act contract includes a contract for which a notice of non-renewal has been filed.

Section 4.3.3 Criteria for City Sphere of Influence Amendments for Schools:

Section 4.3.3.1 City and School District Collaborative Planning:

To ensure that the affected city and school district(s) have engaged in good faith, collaborative long range planning for school sites, LAFCo will consider the following criteria when reviewing proposals for city sphere of influence amendments: (Amended October 16, 2002)

- a. Whether a school site committee, made up of the affected city and school officials have been meeting to engage in discussions and long range planning and the meetings are ongoing.
- b. Whether the affected city has discussed all major development proposals with the school district.
- c. Whether the affected city has a policy of considering school capacity and location when reviewing major development proposals and long range plans.
- d. Whether an official inventory of all potential sites has been evaluated and has been subject to public review.
- e. Whether the affected city general plan and specific plans include adequate and appropriate school locations.
- f. Whether school siting has been addressed in the last five years of development in the affected city.
- g. Whether the proposed sphere of influence change may be unnecessary if the affected city is considering expansions to the sphere of influence or city urban growth boundary.

a and b) Discussions were held with the following agencies for this proposed project on the dates provided:

- City of Oxnard – 8/9/21 and 8/24/22 (Development Advisory Committee [DAC] Hearing)
- County of Ventura – 9/20/21
- LAFCo – 8/9/21
- City of Camarillo – None
- CMWD – None

c) A review of the City of Oxnard's General Plan did not identify any policies considering school capacity. The project Site is at and adjacent to an established middle school.

d) Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety.

One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost effective option.

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	<p>e) The project site is at and adjacent to an established middle school.</p> <p>f) As noted in response to Item d, above, the Oxnard General Plan (City of Oxnard 2016) identifies six sites for future schools, one of which is currently being constructed.</p> <p>g) Separate from this proposed project, the City of Oxnard is not presently considering expansions to the SOI or city urban growth boundary in this area. Moreover, the SOI boundary adjustment is needed to support the proposed project, which must be completed in a timely fashion to support existing and anticipated District needs.</p>
<p><u>Section 4.3.3.2 Options Exhausted:</u></p> <p>To ensure that the affected school district(s) have exhausted options within the existing sphere of influence or city urban growth boundary, LAFCo will consider the following criteria when reviewing proposals for city sphere of influence amendments: (Amended October 16, 2002)</p> <p>a. Whether the affected school district(s) has a long-range facility plan.</p> <p>b. Whether the affected school district(s) has prepared an inventory and evaluation of all district-owned facilities.</p> <p>c. Whether the affected school district(s) has considered joint use facilities with other entities, cities, parks, and other public institutions.</p> <p>d. Whether the affected school district(s) has evaluated all undeveloped land within the affected city's sphere of influence or city urban growth boundary.</p> <p>e. Whether the affected school district(s) has, after consideration of the safety and health of the children, considered asking for any appropriate exceptions from State of California school size guidelines.</p> <p>f. Whether the school district has considered and eliminated multi-story school buildings as an option.</p>	<p>a-f) Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety.</p> <p>One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost-effective option.</p> <p>Utilizing multi-story school buildings would not alleviate the existing parking and circulation issues or provide for a transit hub.</p>
<p><u>Section 4.3.3.3 Overall Planning Issues Addressed:</u></p> <p>To ensure that the affected city and school district(s) have addressed overall planning issues, LAFCo will consider the following criteria when reviewing proposals for city sphere of influence amendments: (Amended October 16, 2002)</p> <p>a. Whether there are unique safety and health concerns of the proposal.</p>	<p>a) As described in this EIR (e.g., Section 3.9, <i>Hazards and Hazardous Materials</i>), there are no unique safety and health concerns associated with this proposed project.</p> <p>b) As described in this EIR (e.g., Section 4.2, <i>Growth-Inducing Impacts</i>), the proposed project is not considered growth-inducing.</p> <p>c) As discussed in Section 3.2 of this EIR, the 9 acres of Prime Farmland and 0.9 acres as Farmland of Statewide</p>

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- b. Whether the proposed new school site is considered growth inducing.
- c. Whether the proposal adversely affects agriculture and/or provides buffers between the school site and adjacent agriculture.
- d. Whether the proposed school site is the best site available when considering logical, orderly, and efficient city boundaries and adopted greenbelts.
- e. Whether the affected city is willing to support expanding the urban growth boundary to accommodate the development site, including requesting a citizen's vote if necessary.
- f. Whether the affected school district(s), after an unsuccessful vote for approval, indicates that the school site must be sited outside the existing urban growth boundary.

Importance found in the approximately 10-acre northern campus expansion area will not be converted to a non-agricultural use. Implementation of the proposed project would result in the conversion of agricultural land in the southern campus expansion area, resulting in a significant, unavoidable, and permanent loss of 8.2 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. No feasible mitigation measures were available to reduce the impact to a less than significant level. However, Mitigation Measure AG-1 is proposed to reduce the potential impact, and the proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east.

d) Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety.

One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost-effective option.

e) The City of Oxnard will consider the requested discretionary approvals; if approved, the proposed project will be consistent with this policy. A citizen's vote will not be necessary.

f) A citizen's vote for approval of the proposed project will not be required.

Table 3-20. LAFCo Consistency Analysis (Division 5: Out of Agency Service Agreements)**Division 5: Out of Agency Service Agreements***Chapter 1: General Policies*

Section	5.1.2	Annexation	Preferred:	
Annexations to cities and special districts are always preferred to out of agency service agreements.				The proposed project includes annexation of all three parcels to the City of Oxnard and CMWD. No out of agency service agreements are requested. As such, the proposed project is consistent with this policy.

As identified in Tables 3-18, 3-19, and 3-20, the proposed project is generally consistent with LAFCo policies and project land use impact would be considered less than significant.

Discussion of project consistency with relevant City of Oxnard 2030 General Plan and El Rio/Del Norte Area Plan polices is provided in Table 3-21. Consistent with Ventura LAFCo Commissioner's Handbook Section 3.2.4.1 (as provided in Table 3-18), this discussion is limited to the northern and southern campus expansion areas and does not include the existing main campus.

The existing main campus of the project Site has been developed with a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on-Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety.

One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost-effective option.

As discussed in Section 3.2 of this EIR, implementation of the proposed project would result in the conversion of agricultural land into educational uses, resulting in a significant, unavoidable, and permanent loss of 8.2 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. No feasible mitigation measures were available to reduce the impact to a less than significant level. However, Mitigation Measure AG-1 is proposed to reduce the potential impact, and the proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east. Through Policy AG-1.3, the County expresses its commitment to restrict development to uses consistent with existing agricultural or open space zoning (County of Ventura 2020a). As discussed in Section 3.2 of this EIR, the project will not have a significant adverse effect on the physical and economic integrity of other prime agricultural or existing open space lands outside of the project area. The northern and southern campus expansion areas are located within the greenbelt established by the 1984 "Joint Resolution of the City Councils of the City of Camarillo and the City of Oxnard and the County of Ventura Establishing a Greenbelt Between North and South of the Two Cities." As part of the proposed project, the RSD is requesting that this agreement be amended. Specifically, the map is to be amended to exclude the proposed northern and southern campus expansion areas. If the requested amendment is approved by all parties (City of Camarillo, City of Oxnard, County of Ventura), then the proposed project would be consistent with this policy. As shown in Table 3-16, the County's approval of the proposed project

is limited to amending the existing Camarillo-Oxnard Greenbelt Agreement. Any conditions imposed on the proposed project will be from other agencies with discretionary approval (e.g., City of Oxnard).

Additionally, Table ED-3 of the El Rio/Del Norte Plan limits the maximum building lot coverage to 60% of total lot area within the Institutional zone (which the northern and southern campus expansion areas will effectively become, if the proposed project is approved); the proposed building coverage on the northern campus expansion area and southern campus expansion area would be approximately 0% and 25%, respectively. Although a copy of the NOP was not provided directly to the El Rio/Del Norte Municipal Advisory Council, they will be included in the distribution list for this EIR. As described in more detail in Section 3.18, *Utilities and Service Systems*, the RSD in general, and the RDV school in particular, are currently in compliance with all federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed project expansion would require continued conformance with these statutes and regulations, including continued participation of the RDV school in existing City recycling programs. Modification of the existing Waste Management Plan will also be required to include the proposed facilities. All new construction will also be required to achieve the 65% diversion requirement per CALGreen standards. The revised plan must be prepared and submitted to the City of Oxnard Environmental Resources Division prior to the issuance of a building permit. Additionally, AB 939 mandates a minimum 67% diversion rate during operations. As such, the proposed project will employ measures to reduce solid wastes generated and will have a recycling program. The proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours and will likely lessen the physical impacts/demand on nearby park and recreational facilities. The increase in runoff volume and rate caused by the proposed project's new impervious surfaces would be mitigated by the project's proposed post-construction features, which are required by the Construction General Permit and the City's MS4 Permit, will follow the TGM (County of Ventura 2011, updated 2015 and 2018), will be defined in the PCSMP, and vetted by the City of Oxnard. The design to the storm water drainage features will be required to comply with the City's 1 cfs/ac flow rate to prevent downstream flooding of the receiving waters and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems. Therefore, the project's storm water drainage impacts would be less than significant. As discussed in Section 3.10.2, Hydrology and Water Quality Impact Analysis, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operation impacts related to groundwater supplies would be less than significant, and no mitigation is required. The proposed project is generally consistent with relevant Ventura County General Plan policies and project land use impact would be considered less than significant.

City of Oxnard 2030 General Plan and Zoning

The project Site is currently located within unincorporated Ventura County and the zoning designation is RE-20,000 S.F. (Existing Campus) and AE-40 ac/MRP (Northern and Southern Campus Expansion Areas). Schools are prohibited within the County's AE-40 zone. However, the proposed project includes annexation into the City of Oxnard whereby the County's land use designations would no longer be applicable to the project Site.

The RSD would process a GPA, RZ, and a Reorganization and SOI amendments through the City of Oxnard. The proposed General Plan land use designation is School, and the proposed zoning designation is Community Reserve (C-R). Schools are an allowed use within the C-R zone with approval of the special use permit (Oxnard Municipal Code Section 16-257). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with the General Plan and zoning land use designations.

The existing main campus is located within an area that is planned for continued use as a middle school, and the northern and southern campus expansion areas are within the Oxnard-Camarillo Greenbelt.

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

A General Plan Consistency analysis for relevant key land use policies is provided in Table 3-21.

Table 3-21. City of Oxnard General Plan Consistency Analysis

Applicable GP Land Use Goals and Policies	Consistency Analysis
<p>Goal CD-1: Balanced Community: A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.</p>	<p>Consistent. The proposed project is an expansion of an existing, comprehensive neighborhood middle school to meet the educational needs of RSD students. In addition, the proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, physical education [P.E.] and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours and will likely lessen the physical impacts/demand on nearby park and recreational facilities.</p>
<p>CD-1.2 Infill Development, Priority to Mixed Use: Promote the efficient use of larger vacant parcels and vacant areas of the City by encouraging infill development, with a priority to mixed uses that reduce vehicle trips and GHG emissions and promote sustainable development goals and objectives.</p>	<p>Consistent. The proposed project is an expansion of an existing middle school surrounded by existing agriculture and residential development. The existing campus is identified in the City of Oxnard 2030 General Plan as a school site, the proposed development in the southern campus expansion area represents infill development, and the northern campus expansion area will remain as an agricultural use for educational purposes. In addition, the proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours and will likely lessen the physical impacts/demand on nearby park and recreational facilities. Moreover, the proposed transportation hub will reduce vehicle miles traveled (VMT) and associated GHG emissions.</p>
<p>CD-1.4 Transportation Choices: Promote the application of land use and community designs that provide residents with the opportunity for a variety of transportation choices (pedestrian, bicycle, transit, automobile).</p>	<p>Consistent. The proposed project is an expansion of an existing middle school surrounded by existing agriculture and residential development. The existing campus is identified in the City of Oxnard 2030 General Plan as a school site, the proposed development in the southern campus expansion area represents infill development, and the northern campus expansion area will remain as an agricultural use for educational purposes. Students attending the expanded school will come from the surrounding neighborhood and would be able to utilize a variety of transportation modes including walking, bicycling,</p>

Applicable GP Land Use Goals and Policies	Consistency Analysis
	bus and/or vehicles on the local roadway network. The proposed transportation hub will reduce VMT and associated GHG emissions.
CD-1.6 Public Facilities: Enhance resident quality of life by providing adequate space for schools, libraries, parks and recreation areas, as well as space for the expansion of public facilities to support the community's vision.	Consistent. The RSD proposes to expand the existing neighborhood middle school, and the proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours. This will likely lessen the physical impacts/demand on nearby park and recreational facilities and would be considered a beneficial impact to public educational facilities.
CD-1.7: Compact Development: Promote the use of development patterns that are more compactly built and use space in an efficient manner as part of the community vision.	Consistent. The RSD proposes to expand the existing neighborhood middle school, and the proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours. This will likely lessen the physical impacts/demand on nearby park and recreational facilities and would be considered a beneficial impact to public educational facilities. The proposed project has a compact design to use space in an efficient manner while simultaneously meeting the RSD's current and future needs and alleviating existing traffic and parking issues. Approval of the requested General Plan Amendment would ensure the proposed project is consistent with the community's vision.
CD-1.8 Natural Resource Conservation: Promote a high quality of life within the community, incorporating the retention of natural open space areas, greenbelts, and the provision of adequate recreational facilities.	Consistent. The RSD proposes to expand the existing neighborhood middle school, and the proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours. This will likely lessen the physical impacts/demand on nearby park and recreational facilities and would be considered a beneficial impact to public educational facilities. Additionally, development of the southern campus expansion area would reduce existing issues associated with traffic and parking, while simultaneously reducing emissions. As such, the proposed project would promote a higher quality of life and have a beneficial impact.

Applicable GP Land Use Goals and Policies	Consistency Analysis
<p>Goal CD-3: A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.</p>	<p>Consistent. The RSD proposes to expand the existing neighborhood middle school, and the proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours. This will likely lessen the physical impacts/demand on nearby park and recreational facilities and would be considered a beneficial impact to public educational facilities. The proposed project would also simultaneously reduce existing traffic and parking issues.</p>
<p>Goal CD-6.1 Agricultural Buffers. Require that agricultural land uses designated for long-term protection and production be buffered from urban land uses through the use of techniques including, but not limited to, greenbelts, open space setbacks, fencing, berming, and windrows.</p>	<p>Consistent. The existing main campus of the project Site has been developed with a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. The RSD has designed the lay-out of the proposed project in order to minimize compatibility issues with adjacent agricultural uses. For example, the northern campus expansion area would continue to be used for educational purposes pertaining to agriculture, the parking and transportation hub in the southern campus expansion area would be buffered from agricultural uses to the east by proposed recreational fields, and agricultural uses to the north and east would have a 300-foot (or greater) buffer from the nearest buildings. Please refer to the discussion in Section 3.2 for additional details.</p>
<p>CD-6.2 Agricultural Preservation: Reserve agricultural land and uses within the Oxnard Planning Area unless other uses are allowed through future CURB amendment and/or applicable exemptions.</p>	<p>Consistent. The northern and southern expansion campus areas are currently used for agriculture. While the northern campus expansion area would continue to be used for agriculture and educational purposes, the southern campus expansion area would be converted to a non-agricultural use. Both conversions would be allowed if the requested CURB amendment is approved.</p>
<p>Goal CD-7: Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.</p>	<p>Consistent. The RSD proposes to expand the existing neighborhood middle school, and the proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours. This will likely lessen the physical impacts/demand on nearby park and recreational facilities and would be considered a beneficial impact to public educational facilities. The proposed project would also simultaneously reduce existing traffic and parking issues.</p>
<p>CD-7.12 Urban Village Collocation with Schools: Promote the collocation of parks</p>	<p>Consistent. The RSD proposes to expand the existing neighborhood middle school, and the proposed recreational</p>

Applicable GP Land Use Goals and Policies	Consistency Analysis
with school facilities for the purpose of enhancing available open space and recreation.	facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours. This will likely lessen the physical impacts/demand on nearby park and recreational facilities and would be considered a beneficial impact to public educational facilities. The proposed project would also simultaneously reduce existing traffic and parking issues.
CD-8.4 Cost Sharing: Continue to ensure that any area annexed to the City share equitably in the costs of all necessary municipal improvements.	Consistent. As identified in Section 3.15.2, Public Services Impact Analysis, public funds, such as property taxes, would be used to cover the incremental costs associated with providing police services for future enrollment at expanded campus. Additionally, the recreational facilities proposed to be made available to the public outside of school hours (including a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will likely lessen the physical impacts/demand on nearby park and recreational facilities (and reduce associated costs).
CD-8.5 Impact Mitigation: Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.	Consistent. This EIR evaluates potential impacts related to construction and operation of the proposed project and includes mitigation measures when warranted and feasible to reduce proposed project impact. Mitigation measures have been identified for agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise, transportation, tribal and cultural resources, and utilities and service systems in this EIR.
CD-8.7 Community Balance: Create an appropriate balance between urban development and preservation of agricultural uses by promoting development within the CURB while designating land outside the CURB as Resource Protection, Open Space or Agricultural land use, unless otherwise allowed through a CURB amendment and/or exemptions from the SOAR ordinance.	Consistent. The northern and southern campus expansion areas are currently used for agriculture. While the northern campus expansion area would continue to be used for agriculture and educational purposes, the southern campus expansion would be converted to a non-agricultural use. Both conversions would be allowed if the requested CURB amendment is approved. If the required discretionary approvals are granted, the project would be exempt from the SOAR ordinance.
CD-8.8 Public Facility Service Areas: Provide appropriate service areas for existing and planned public facilities such as a museum, secondary and elementary schools, fire stations, branch libraries, community	Consistent. The existing RDV campus is identified in the City of Oxnard 2030 General Plan (Figure 3-1) as a school location. The RSD proposes to expand the existing neighborhood middle school, and the proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball

Applicable GP Land Use Goals and Policies	Consistency Analysis
centers, parks, and infrastructure utility for support facilities.	courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours. This will likely lessen the physical impacts/demand on nearby park and recreational facilities and would be considered a beneficial impact to public educational facilities. The proposed project would also simultaneously reduce existing traffic and parking issues.
<p>ER-3.2 Review of Development Proposals: Review development proposals in accordance with applicable Federal, State, and local statutes protecting special-status species and jurisdictional wetlands and be open to requiring greater protection.</p>	<p>Consistent. No candidate, sensitive, or special-status wildlife or plant species in any local or regional plans, policies, or regulations, or regulated by the CDFW or USFWS were observed during the Site visit conducted in September 2021. The potential for special-status wildlife species to occur on Site is low, and there is no potential for special-status plants to occur on Site. Ferruginous hawk, white-tailed kite, and American peregrine falcon are unlikely to nest on-Site due to the lack of suitable habitat and prey species. Although potential suitable burrows and burrow surrogates were observed, burrowing owl is unlikely to occur at burrows near recreational areas or breed in Ventura County. In direct removal of trees, use of heavy machinery, and/or significant ground disturbance during construction activities has the potential to disturb nesting birds, including special-status bird species, if present. Therefore, mitigation measures BIO-1, BIO-2, and BIO-3 will be required to reduce project impacts to less than significant.</p> <p>No jurisdictional waters of the U.S. and/or wetlands were observed on the project Site. Therefore, neither a CWA Section 401 nor 404 permit is required. Similarly, a permit pursuant to Section 1602 of the California Fish and Game Code would not be required from CDFW.</p>
<p>ER-12.8 Greenbelt Policies: Continue the commitment of maintaining the Oxnard-Camarillo and Oxnard-Ventura Greenbelts and their associated policies.</p>	<p>Consistent. Amending Exhibit 2 of the Oxnard-Camarillo Greenbelt agreement (i.e., the map) to remove the southern campus expansion area (as a non-agricultural campus expansion) and the northern campus expansion area (for consistency) from the Greenbelt would not otherwise require a material change to the text within the agreement, and the agreement would remain in place. Therefore, if the request is approved by all parties, the proposed project would be consistent with this policy.</p>
<p>ICS-21.3 Siting of Schools: Minimize the student crossing of major arterial or collector streets by encouraging school districts to site schools within residential neighborhoods, where appropriate.</p>	<p>Consistent. The project Site is an expansion of an existing middle school campus adjacent to residential neighborhoods. The expansion will reduce traffic issues associated with access to the existing campus, thereby improving the experience and safety for pedestrians and bicyclists. The transit hub in the southern campus expansion area will also improve the ability for students to use the bus to get to and from the Site. Finally, the</p>

Applicable GP Land Use Goals and Policies	Consistency Analysis
	improved circulation within the Site would increase safety for all attendees at the RDV campus.
MC-2.5 CEQA Notification: Continue to provide CEQA notifications to Navy Base Ventura County (NBVC) for review and comment on City discretionary land use actions to include, but not limited to, General/Specific Plan/Coastal Plan amendments, zone changes, tract or parcel, maps, and special use or coastal development permits.	Consistent. The proposed project would include a City of Oxnard GPA and Pre-zone. A copy of the Notice of Availability (NOA) of a Draft EIR will be sent to NBVC to provide notification that the EIR is available for review and comment during the 45-day public review period.
MC-3.2 Vertical Obstructions: Ensure all new development within the City is developed in accordance with Federal Aviation Regulations (FAR) Part 77 that is generally concerned with any construction or alteration more than 200 feet above ground level.	Consistent. The proposed project does not include buildings or structures more than 200 feet above ground level and would not require the use of cranes or other equipment in excess of 200 feet during construction.
MC-3.4 Reference the Navy's Military Influence Area Map: Refer to the Navy's Military Influence Map as it may be updated, to identify possible City actions in or near NBVC installations, operations areas, and/or on or along designated mobilization routes and consult with NBVC for their input.	Consistent. The proposed project is not within a Military Influence Area as identified on the General Plan Military Influence Areas Map (City of Oxnard General Plan Figure 7-1). No further consultation is required.

As identified in Table 3-21, the proposed project would be generally consistent with the General Plan policies and the project's land use impact is considered less than significant.

Oxnard-Camarillo Greenbelt Agreement Map Amendment

Annexation of the northern or southern campus expansion areas to the City of Oxnard would trigger an amendment to the Oxnard-Camarillo Greenbelt Agreement, as approved by City of Oxnard Resolution No. 8616, Board of Supervisors Resolution No. 222, and City of Camarillo Resolution No. 84-9 in February 1984. Specifically, the resolution reads as follows:

“Now, Therefore, Be It Resolved, that the Camarillo City Council, the Oxnard City Council, and the Ventura County Board of Supervisors hereby establish this greenbelt for and agree to a policy of non-annexation, non-development, and retention of open space uses...”

As such, the proposed project includes a request to the City of Oxnard, City of Camarillo, and County of Ventura to amend Exhibit 2 of the agreement (i.e., the map) to remove the southern campus expansion area (as a non-agricultural campus expansion) and the northern campus expansion area (for consistency) from the Greenbelt. Approval of this request would not otherwise require a material change to the text within the agreement, and the agreement would remain in place. Therefore, if the request is approved by all parties, there would be no significant impact to the Oxnard-Camarillo Greenbelt Agreement.

County of Ventura and City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinances

Currently, the northern and southern campus expansion areas are located within the County of Ventura's SOAR Ordinance. Generally, removing parcels from the County's SOAR ordinance requires a vote of the people. In this case, however, if the requested annexations are approved, these two parcels would fall under the City of Oxnard's SOAR ordinance which exempts school facilities from a vote of the people. Specifically, Section 3, Subsection 6 (Exemptions) states:

"The provisions of this ordinance otherwise requiring a vote of the people do not apply to nor affect the authority and discretion of the City Council with respect to any roadways designated in Chapter 4, Infrastructure and Services of the 2030 Oxnard General Plan as of adoption and subsequent amendments, construction of public potable water facilities, public schools, public parks or other government facilities, or any development project that has obtained as of the effective date of this initiative a vested right pursuant to state or local law."

Therefore, if the proposed annexations are approved, the proposed project would be consistent with the City of Oxnard's SOAR ordinance.

3.11.2.4 Cumulative Impacts

As described in Sections 2.2 and 2.6, as of January 2022, over 290 planned and pending projects are located within the City of Oxnard. Projects in the Site vicinity include Rio Urbana, the Maulhardt/Stiles NECSP Sub-Neighborhood Plan, various projects falling under the greater Riverpark development, and multiple commercial and industrial projects. The Riverpark development, Rio Urbana, and the Maulhardt/Stiles NECSP Sub-Neighborhood Plan are the three pending projects that could directly affect the proposed project herein and have the potential to bring in additional student population to the City through new residential units. While the commercial and industrial projects in the Site vicinity may add available jobs and consumer appeal to the area, these projects will not directly add permanent population and housing that would affect RSD and its student body (City of Oxnard 2022a; RSD 2021). District-wide individual school boundary adjustments will be made as needed in the future, and the proposed project will improve the RSD's ability to accommodate an increased student body.

The proposed project includes the expansion of the RDV campus and related programs and would be required to comply with applicable land use regulations in order to be granted the discretionary land use approvals needed for expansion. As shown in Table 3-16, and as discussed above, the various discretionary approvals that are required include annexation into the City of Oxnard, annexation into the CMWD, General Plan and Zoning (map) Amendments, amending the Oxnard-Camarillo Greenbelt Agreement, and Amending the City of Oxnard's SOI and CURB. If these requests are granted, the proposed project would comply with all applicable policies and ordinances. Aside from the impacts associated with agricultural conversion addressed in Section 3.2 of this EIR, project contribution to a cumulative land use impact would thereby be considered less than significant.

3.11.2.5 Mitigation Measures

No Mitigation Measures are required.

3.11.2.6 Level of Impact After Mitigation

The potential land use impacts associated with the proposed project would be less than significant and no Mitigation Measures would be required.

3.12 MINERAL RESOURCES

This section provides a discussion of existing mineral resources conditions and an analysis of potential impacts from implementation of the proposed project.

3.12.1 Environmental Setting

3.12.1.1 Existing Conditions

The project Site is located in an area developed primarily for residential and agricultural land use situated in the Rancho Santa Clara del Norte General Plan Area of Ventura County (Ventura County 2020a). The Site is relatively flat, and slopes gently to the south and southwest, with surface elevations ranging from approximately 87 to 94 feet amsl. The Site is currently being used for organic agricultural production and contains sparse non-native vegetation at the margins (weeds and grasses). Review of historical aerial photographs dating from 1927 to the present time indicate that the Site has been used for agricultural purposes (crop production) since at least 1927 to the present time.

The proposed project is located on the Oxnard Plain area of Ventura County. The Oxnard Plain is part of the Ventura Basin which is bounded on the north by the Santa Ynez-Topatopa Mountains and on the south by the Channel Islands, the western Santa Monica Mountains, and the Simi Hills. To the east, the basin is bounded by the San Gabriel fault zone. To the west, the Santa Barbara Channel separates the offshore islands from the mainland. Near the Santa Barbara Channel, the Ventura Basin is a transitional zone consisting of a coastal plain and shoreline. The coastal plain is composed of a broad alluvial plain, some of which forms estuaries and lagoons.

Based on the Ventura County Geologic Map for the Oxnard Quadrangle, the Site is underlain by Holocene alluvial fan deposit composed predominantly of alluvial clay, sand, and gravel deposits (Clahan 2003).

The Site is not located in an oil field and no oil wells are located on the Site. Therefore, petroleum mineral resources were not considered in the EIR.

In the *Mineral Land Classification of Ventura County, Special Report 145 Parts I, II, and III* the State Mining and Geology Board (SMGB) has designated that the project Site is located in a Mineral Resource Zone (MRZ) based upon the known or inferred presence of mineral resources, in this case aggregate mineral resources, more commonly known as construction grade sand and gravel (Ventura County 2020b; CDMG 1981; 1993). Figure 8-9 of the *Ventura County 2040 General Plan Update Background Report* (Ventura County 2020b) shows that the Site is located in an area designated as SMGB Mineral Resource Zone-2 (MRZ-2). MRZ-2 areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present (2a) or where such resources are inferred (2b). The Site was not defined as MRZ-2a or MRZ-2b in the documents reviewed for this EIR. Ventura County has determined that lands classified as MRZ-2 (or otherwise designated as areas of statewide or regional significance for mineral resources) should be protected from incompatible land uses that would inhibit extraction of or access to the available mineral resources (Ventura County 2020b).

The MRZ-2 lands are identified in the *Ventura County Non-Coastal Zoning Ordinance* (Ventura County Planning Division [VCPD] 2019) with a Mineral Resource Protection (MRP) Overlay. The *Ventura County Non-Coastal Zoning Ordinance* states that the purpose of the Ventura County Mineral Resources Protection Overlay Zone (MRP) zoning designation are:

- a. To safeguard future access to an important resource;
- b. To facilitate a long-term supply of mineral resources within the County;
- c. To minimize land use conflicts;
- d. To provide notice to landowners and the general public of the presence of the resource; and

- e. The purpose is not to obligate the County to approve use permits for the development of the resources subject to the MRP Overlay Zone.

The Site and the adjacent area to the southeast and east are zoned Agricultural Exclusive forty acre minimum lot/Mineral Resources Protection Overlay Zone (AE-40 ac/MRP). The MRP zoning designation is defined in the preceding paragraph. North Rose Avenue is adjacent to the northwest Site boundary. The area directly across North Rose Avenue from the Site is zoned Rural Exclusive 20,000 square feet minimum lot (RE 20,000 sq. ft.) and Rural Exclusive 20,000 minimum square feet lot (RE 10,000 sq. ft.). The RDV Middle School, located adjacent to the northeast Site boundary, is zoned RE 20,000 sq. ft. (VCPD 2019). The Oxnard Auto Center located adjacent to the southwest Site boundary across Collins Street is zoned for Auto Sales and Service (City of Oxnard 2022a).

3.12.1.2 Regulatory Setting

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act of 1975 (SMARA) was enacted by the California legislature to promote the conservation of the state's mineral resources, ensure adequate reclamation of mined lands, and prevent or minimize the negative impacts of surface mining to public health, property, and the environment. Among other provisions, SMARA requires the California State Geologist to classify land in California into MRZs according to the known or inferred mineral potential of the land as determined by geological study. Upon completion of each study, the State Geologist submits the mineral land classification report to the SMGB. The SMGB designates certain lands as MRZ-2 where they are underlain by mineral deposits of Statewide significance. The designation information is transmitted to local governments for incorporation into general plans and implanting zoning ordinances. Local agencies can serve as a "Lead Agency" under SMARA if they have adopted a surface mining ordinance in conformance with SMARA requirements. As a Lead Agency, a local government can approve Reclamation Plans and conduct inspections of mining facilities (Ventura County 2020b).

SMARA applies to anyone engaged in surface mining operations in California, including government agencies, and also applies to federally managed lands that disturb more than one acre or remove more than 1,000 cubic yards of material cumulatively from one site. Regulated mining activities include prospecting and exploratory activities, dredging and quarrying, streambed skimming, borrow pitting, and the stockpiling of mined materials (Ventura County 2020b).

The California Department of Conservation, Division of Mines and Geology (DMG) "Mineral Land Classification Project" publishes mineral resource maps for land use planning and mineral conservation, with updates approximately every 10 years (Ventura County 2020b).

The four MRZ categories are:

- MRZ-1: Areas of No Mineral Resource Significance;
- MRZ-2: Areas of Identified Mineral Resource Significance;
- MRZ-3: Areas of Undetermined Mineral Resource Significance; and
- MRZ-4: Areas of Unknown Mineral Resource Significance (Ventura County 2020b).

The distinction between the MRZ-1 and MRZ-4 categories is important because MRZ-4 does not imply little likelihood for the presence of mineral resources, but rather a lack of knowledge regarding mineral occurrence. Further study could determine the reclassification of land in MRZ-4 areas to another category (Ventura County 2020b).

Local

Ventura County 2040 General Plan

The Ventura County 2040 General Plan covers mineral resources in Chapter 6, Conservation and Open Space Element, Section 6.5 Soil and Mineral Resources (Ventura County 2020c). The Ventura County land use planning policies for aggregate mineral resources are contained in Conservation and Open Space (COS) Element 6.0. The purpose of COS 6.0 is *“To manage mineral resources in a manner that identifies economically significant mineral deposits and plans for and protects access to, extraction, and long-term conservation of mineral resources for existing and future generations”*.

COSs 6.1 through 6.5 outline the management policies for aggregate mineral resources as follows:

- COS 6.1 **Balanced Mineral Resource Production and Conservation.**** The County shall balance the development and conservation of mineral resources with economic, health, safety, and social and environmental protection values. (Master Plans, Strategies, and Programs [MPSP], Master Plans, Strategies, and Programs [IGC], Regulation and Development Review [RDR]);
- COS 6.2 **Significant Mineral Resource Deposits.**** In accordance with California Code of Regulations Section 3676, the County shall maintain classification and/or designation reports and maps of mineral resources deposits as identified by the California State Geologist as having regional or statewide significance and any additional deposits as may be identified by the County, and as provided by the State Mining and Geology Board. The County shall provide notice to landowners and the general public on the location of significant mineral resource deposits. (MPSP, Public Information [PI]);
- COS 6.3 **Mineral Extraction Location Priority.**** The County shall promote the extraction of mineral resources locally to minimize economic costs and environmental effects associated with transporting these resources. (IGC, Joint Partnerships with the Private Sector [JP]);
- COS 6.4 **Mineral Resource Area Protection.**** Discretionary development within Mineral Resource Zones identified by the California State Geologist shall be subject to the Mineral Resource Protection (MRP) Overlay Zone and is prohibited if the use will significantly hamper or preclude access to or the extraction of mineral resources (RDR);
- COS 6.5 **Mineral Resource Land Use Compatibility.**** The County shall ensure that discretionary development is compatible with mineral resources extraction and processing if the development is to be located in areas identified on the Mineral Resource Zone Maps prepared by the California State Geologist or in County identified mineral resource areas. The County shall:
1. Require an evaluation to ascertain the significance of the mineral resources deposit located in the area of a discretionary development and to determine if the use would significantly hamper or preclude access to or the extraction of mineral resources;
 2. Require discretionary development proposed to be located adjacent to existing mining operations to provide a buffer between the development and mining operations to minimize land use incompatibility and avoid nuisance complaints; and
 3. Establish a buffer distance based on an evaluation of noise, community character, compatibility, scenic resources, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality (RDR).
- COS 6.6 **In-River Mining.**** The County shall require discretionary development for in-river mining to incorporate all feasible measures to mitigate water, biological resource, flooding, and erosion impacts (RDR).

2011 Initial Study Assessment Guidelines

The Initial Study Assessment Guidelines include criteria for evaluating environmental impacts for mineral resources. The criteria for evaluating environmental impacts for mineral resources can be found in Section 3a. Mineral Resources-Aggregate (Ventura County 2011a). The Initial Study Assessment Guidelines refers to the Applicable General Plans and Goals found in the Ventura County General Plan (Ventura County 2020b) and the 2011 *Ventura County General Plan El Rio/Del Norte Area Plan* (Ventura County 2011b).

2019 Ventura County Non-Coastal Zoning Ordinance

The Non-Coastal Zoning Ordinance regulates mineral resources through Section 8104-7.2 - Mineral Resources Protection (MRP) Overlay Zone. The Ventura County MRP Overlay Zone is described in detail in Section 3.12.1.1 (VCPD 2019).

City of Oxnard 2030 General Plan

The City of Oxnard 2030 General Plan covers mineral resources in Chapter 5, Environmental Resources, Section 5.3 Goals and Policies, Mineral Resources (City of Oxnard 2016). The City of Oxnard land use planning policies for aggregate mineral resources are as follows:

- ER-13.1 Monitoring Mining Uses.** Monitor and comment on the appropriateness of mining activities conducted under the authority of adjacent jurisdictions;
- ER-13.2 Reclamation of Mineral Resources.** Promote the efficient reclamation of mineral resources areas;
- ER-13.3 Compatibility with Existing Land Uses.** Ensure that any mining operations produce the least amount of incompatibility with surrounding, existing land uses (i.e., limited hours of operation, pest control, etc.) and adequately mitigate environmental and aesthetic impacts; and
- ER-13.4 Limiting Special Production Techniques.** Require that specialized production techniques, such as slant drilling, limit the land area committed to oil recovery and to extract such resources adjacent to existing development, open space, recreations areas, or sensitive habitat areas.

3.12.2 Impact Analysis

3.12.2.1 Methodology

Tetra Tech performed a comprehensive assessment of the impacts of the proposed project with respect to mineral resources through review of the relevant state and local documents described in Sections 3.12.1.1 and 3.12.1.2 that describe the Site mineral resource classification and state, Ventura County, and City of Oxnard policies regarding the protection of mineral resources.

Mineral resources were then assessed based on the significance thresholds identified below.

3.12.2.2 Significance Thresholds

The thresholds for mineral resources impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *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?*
- *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?*

3.12.2.3 Project Impacts

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?

The project Site is located in an area of Ventura County where the SMGB has designated MRZ-2 based on the *Mineral Land Classification of Ventura County, Special Report 145 Parts I, II, and III*. (CDMG 1981). While the areas designated MRZ-2 represent the State's best guess as to where aggregate resources are located, these conclusions were based upon proprietary industry data, historic well logs and borings, and general knowledge about aggregate bearing formations. No original field research was conducted to specifically assess the quantity or quality of the resource. (Ventura County 2019). Therefore, the project Site is in an area or where the presence of aggregate mineral resources is inferred, or MRZ-2b. There is an absence of historical surface mining in the immediate area. In addition, surface mining at the Site would have to be consistent with the area land use designations and found to be consistent with the neighboring land uses. It is unlikely that mining activities would be found compatible with the adjacent land uses including the residential areas immediately across North Rose Avenue from the Site, the adjacent RDV Middle School, or Oxnard Auto Park across Collins Street to the south of the Site. Also, the two separate areas of the Site that could be available for mineral resource extraction, 10.0 acres (northern campus expansion area) and 11.1 acres (southern campus expansion area) are too small to support mineral extraction surface mining operations. Based on the above factors, the potential for surface mining at the project Site is considered extremely low. While proposed project improvements will require the use of sand, gravel, and aggregate during construction, due to the limited size of the proposed campus in comparison to the level of development being experienced in the City of Oxnard and the region, the proposed project would not require such a substantial portion of the existing mineral resources in the area to create a shortage of supplies for other projects and consumers. Therefore, there would be no project impact. Therefore, the proposed project would not be expected to 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 and the potential impact to future mineral resources is less than significant.

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?

As stated in the previous section, the project Site is in an area or where the presence of aggregate mineral resources is inferred, or MRZ-2b. There is an absence of historical surface mining in the immediate area. In addition, surface mining at the Site would have to be consistent with the area land use designations and found to be consistent with the neighboring land uses. It is unlikely that mining activities would be found compatible with the adjacent land uses including the residential areas the immediately across North Rose Avenue from the Site, the adjacent RDV Middle School, or Oxnard Auto Park across Collins Street to the south of the Site. Also, the two separate areas of the project Site that could be available for mineral resource extraction, 10.0 acres (northern campus expansion area) and 11.1 acres (southern campus expansion area) are too small to support mineral extraction surface mining operations. Based on the above factors, the potential for surface mining at the project Site is considered extremely low. Therefore, the proposed project would not be expected to 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 and the potential impact to future mineral resources is less than significant.

3.12.2.4 Cumulative Impacts

As noted above, the proposed project would not be expected to 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 and the potential impact to future mineral resources is less than significant. The proposed project would not be expected to 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 and the potential impact to future mineral resources is less than significant. Therefore, cumulative project impacts are considered less than significant.

3.12.2.5 Mitigation Measures

No Mitigation Measures are required.

3.12.2.6 Level of Impact After Mitigation

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

3.13 NOISE

This section provides an analysis of the potential noise impacts associated with the construction and operation of the proposed project. This analysis describes the existing and proposed conditions of noise in the study area, evaluates the relevant components and characteristics, and assesses the impacts that have the potential to occur as a result of the proposed project. As noted in the IS (Appendix A), potential project impacts associated with noise levels within the vicinity of private airstrips or airport land use plans was found to be less than significant and are not discussed in detail in the EIR.

3.13.1 Environmental Setting

3.13.1.1 Existing Conditions

The existing noise environment consists of vehicle noise from local street traffic on Rose Avenue, Colins Street, Auto Center Drive, nature sounds, and community sounds. The project Site is adjacent to agricultural land to the north and east; commercial land to the south; and single-family residential land to the west. The Oxnard Airport is located approximately 4 miles southwest of the project Site.

3.13.1.2 Regulatory Setting

Federal

U.S. Environmental Protection Agency

The U.S. EPA (U.S. EPA 1974) has developed and published criteria for environmental noise levels with a directive to protect public health and welfare with an adequate margin of safety. This U.S. EPA criterion (Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety) was developed to be used as an acceptable guideline when no other local, county, or State standard has been established. However, the U.S. EPA criterion is not meant to substitute for agency regulations or standards in cases where States and localities have developed criteria according to their individual needs and situations.

Federal Transit Administration (FTA)

The FTA has developed vibration impact thresholds for noise-sensitive buildings, residences, and institutional land uses. These thresholds are 80 vibration velocity level (VdB) at residences and buildings where people normally sleep (e.g., nearby residences and daycare facilities) and 83 VdB at institutional buildings (e.g., schools and churches). These thresholds apply to conditions where there are an infrequent number of events per day. Although established for transportation-related activities, these thresholds are widely used to evaluate the significance

State

The State of California

Office of Noise Control Standards has also developed land use compatibility guidelines for community noise (California Department of Health 1976). Following these guidelines, establishing residences, churches, libraries, hospitals, and schools in areas exceeding 70 decibels (dB) community noise equivalent level (CNEL) is normally unacceptable. These facilities are conditionally acceptable in areas that measure between 60 and 70 dB CNEL. Professional and commercial office buildings are normally unacceptable in areas exceeding 75 dB CNEL and are conditionally acceptable in areas that measure between 67 dB and 77 dB CNEL. These guidelines, however, can be modified to reflect sensitivities of individual communities to noise.

Local

The City of Oxnard Noise Element

The City of Oxnard Noise Element to the General Plan identifies the land use compatibility standard for noise-sensitive land uses as a CNEL of 55 A-weighted decibels (dBA) to 70 dBA as conditionally acceptable. The Noise Element has identified mutually compatible goals, objectives, and policies that provide a general framework for future efforts to achieve a quiet environment. These goals, objectives and policies listed in the Noise Element are provided below:

- Goals
 - A quiet environment for residents of Oxnard.
- Objectives
 - Provide acceptable noise levels for residential and other noise-sensitive land uses consistent with State guidelines.
 - Protect noise sensitive uses from areas with high ambient noise levels.
 - Integrate noise considerations into the community planning process to prevent noise/land use conflicts.
- Policies
 - The City should encourage land uses that are not noise sensitive in areas that are permanently committed to noise producing land uses, such as transportation corridors.
 - The City should promote maximum efficiency in noise abatement efforts through intergovernmental coordination and public information programs.
 - Educational institutions should be located in areas where students and teachers can perform without distraction from noise.
 - The City shall promote, where feasible, alternative sound attenuation measures other than the traditional wall barrier.
 - Municipal policies shall be consistent with the Ventura County Airport Land Use Commission's adopted land use plan.
 - Proposed development projects shall not generate more noise than that classified as "satisfactory," as determined by noise compatibility standards, on nearby property. Project applicants shall reduce or buffer the noise generated by their projects.
 - The City shall prohibit the development of noise-sensitive land uses within the Oxnard Airport 65 dB(A) CNEL contour.
 - The City shall continue to enforce State Noise Insulation Standards for proposed projects in suspected high noise environments. The Planning Division shall notify prospective developers that, as a condition of permit issuance, they must comply with noise mitigation measures, which designed by an acoustical engineer. No building permits will be issued without City staff approval of the acoustical report/design.
 - The City shall establish noise referral zones along existing or proposed major transportation routes. Proposed development within these zones should be evaluated for noise impacts.

- Preparation of the Ormond Beach Specific Plan shall include acoustical analysis to determine potential impacts from Point Mugu Naval Air Station (NAS) and Air National Guard facility.
- Noise contour maps and tables shall be utilized as a guide to future land use decisions.

City of Oxnard Code of Ordinances

The City of Oxnard's Code of Ordinances Chapter 7 Section 7-185 limits noise propagation to residential land uses from stationary equipment during the daytime period (7:00 a.m. to 10:00 p.m.) to 55 dBA equivalent continuous sound level (L_{eq}) and during the nighttime period (10:00 p.m. to 7:00 a.m.) to 50 dBA L_{eq} .

3.13.2 Impact Analysis

3.13.2.1 Methodology

To determine potential noise effects of the proposed project during the daily operations of the facility, a noise model was constructed to evaluate the effects of the proposed project related noise sources on the environment. Modeling of the project Site and surrounding environment was accomplished using Cadna (Computer Aided Noise Abatement), which is a model-based computer program developed for predicting noise impacts in a wide variety of conditions. Cadna allows for the input of project information such as noise source data, barriers, structures, and topography to create a detailed computer-aided drafting (CAD) model and uses the most up-to-date calculation standards to predict outdoor noise impacts to property lines and adjacent surrounding areas.

Acoustic emission levels for activities associated with proposed project construction were based upon data gathered by the FHWA, as documented in Construction Noise Handbook, section 9.4.1 RCNM Inventory, providing values for maximum instantaneous noise level (L_{max}) at 50 feet and utilization factor for typical construction equipment. Using those values as inputs to a basic propagation model, construction noise levels were calculated at the nearest residence. The basic model assumed spherical wave divergence from a point source. Furthermore, the model conservatively assumed that all pieces of construction equipment associated with an activity would operate simultaneously for the duration of that activity. An additional level of conservatism was built into the construction noise model by excluding potential shielding effects due to intervening structures and buildings along the propagation path from the site to receiver locations.

3.13.2.2 Significance Thresholds

The thresholds for noise resource impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies?*
- *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

3.13.2.3 Project Impacts

Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance, or applicable standards of other agencies?

The City of Oxnard General Plan Noise Element identifies land use compatibility standard for noise-sensitive land uses as a CNEL of 55 dBA to 70 dBA as conditionally acceptable. The dominant noise source in the vicinity of the proposed project Site is traffic noise associated with Rose Avenue and Collins Street. Based on existing traffic

volumes, noise impacts to adjacent residences along Rose Avenue range from 68 to 70 dBA CNEL. The proposed project would result in an increase in traffic along Rose Avenue and Collins Street during the arrival and departure of students. The proposed project traffic analysis identifies an increase of 792 Average Daily Trips (ADT) to Rose Avenue and Collins Street. This increase in ADT represents an increase of less than 1 dBA at the residences adjacent to the proposed project. According to the CEQA guidelines, an increase in the overall ambient community noise level of less than 1 dBA is considered to be a less than significant impact. The construction of the proposed Site would have only a minimal impact on daily traffic volumes in the proposed project vicinity, and thus would have minimal impact on traffic noise conditions.

Construction of the proposed project is planned to start in the first quarter 2023. All project construction activities are anticipated to be completed within 18 months. The project construction activities are anticipated to occur in phases and include site preparation, grading, building construction, paving, and architectural coating. These construction activities would require a variety of equipment. Typical construction equipment would not be expected to generate noise levels above 90 dBA at 50 feet, and most equipment types would typically generate noise levels of less than 85 dBA at 50 feet.

The highest noise levels during construction are normally generated during Site grading and paving work. Grading equipment would be the loudest equipment used at the project Site. This equipment is expected to generate a L_{max} of up to 71–80 dBA at the homes located at a distance of 100 feet to the west of the proposed project. This would be loud enough to temporarily interfere with speech communication outdoors and indoors with the windows open.

Worst-case construction levels would generate an L_{max} of 90 dBA at the RDV Middle School. This is loud enough to interfere with speech communication outdoors or indoors. Project construction would occur between the hours of 7:00 a.m. and 5:00 p.m., Monday through Friday. Project construction will also implement standard noise reduction measures. Due to the infrequent nature of loud construction activities at the project Site, the limited hours of construction, and the implementation mitigation measure N-1, the temporary increase in noise due to construction is considered to be a less than significant impact with mitigation.

The project Site is located within the Oxnard Airport SOI. The airport runway midfield point is located approximately 4 miles southwest of the project Site. Oxnard Airport is an active general aviation/small scheduled service airport with approximately 169 based aircraft and approximately 74,157 operations for calendar year 2016 (VCTC 2017). The Oxnard Airport Noise Contour map within the City of Oxnard Noise Element to the General Plan shows that the project Site is located outside of the 60 dBA CNEL contour. Therefore, the noise impact levels from the Oxnard Airport to the project Site will be below 60 dBA CNEL and with typical educational facility construction with windows closed, interior noise levels from aircraft operations are expected to achieve 45 dBA CNEL or less, which achieves both the State and City interior noise requirements. Therefore, noise impacts from the Oxnard Airport are considered to be less than significant.

The City of Oxnard's Code of Ordinances Chapter 7 Section 7-185 limits noise propagation to residential land uses from stationary equipment during the daytime period (7:00 a.m. to 10:00 p.m.) to 55 dBA L_{eq} and during the nighttime period (10:00 p.m. to 7:00 a.m.) to 50 dBA L_{eq} . The proposed project consists of the construction and operation of an expansion to the RDV Middle School comprising approximately of an additional 11.1 acres (southern campus expansion area) incorporating new parking lots and six new buildings. These six new buildings were assumed to include an approximate total of 25 rooftop HVAC units and 25 rooftop exhaust fans. The classrooms would be designed and constructed to have a Community Noise Equivalent Level of 45 dB or less.

This proposed project will include six new buildings, which include an approximate total of 25 rooftop HVAC units and 25 rooftop exhaust fans. Given the elevated rooftop height for the mechanical equipment and assuming the rooftop mechanical equipment operates simultaneously, the noise levels from the operation of all the rooftop mechanical equipment would range from 21 dBA L_{eq} at the residential homes located directly northwest of the project to 29 dBA L_{eq} at the residential homes located directly west of the proposed project. The noise impacts from the rooftop mechanical equipment will result in a less than 1 dBA increase to the existing ambient noise levels. The

noise levels generated by the proposed project will comply with the City of Oxnard's General Plan and Code of Ordinances. Therefore, impact due to ambient noise levels in the vicinity of the proposed project is less than significant.

Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Operation of the middle school would not generate vibration; however, construction of the classroom buildings and Site grading as well as infrastructure improvements and utility connections would require the use of equipment that could generate vibration. Possible sources of vibration may include bulldozers, dump trucks, backhoes, rollers, and other construction equipment that produces vibration. No blasting will be required at the project Site.

Project construction activities would occur within approximately 100 feet from the nearest single-family residence. According to FTA guidelines, a vibration level of 78 VdB is the threshold of perceptibility for humans. For a significant impact to occur, vibration levels must exceed 80 VdB during infrequent events (Federal Transit Administration 2006). Based on the levels published by the FTA (Federal Transit Administration 2006) and the type of equipment proposed for use at the proposed project, coupled with the distance to the existing identified noise sensitive receptors, analysis shows that the vibration levels maybe perceptible at the nearest sensitive receptors, but will be below the maximum vibration level of 80 VdB. This vibration level is considered acceptable for impacts to sensitive receptors.

Project construction will also occur directly adjacent to the middle school buildings and will result in vibration levels up to 94 VdB, which will exceed the 80 VdB level at the middle school. This would be a significant impact to students and personnel on the existing RDV campus based on their proximity to the construction activities. However, with the implementation of mitigation measure N-1, the temporary increase in noise due to construction is considered to be a less than significant impact with mitigation.

3.13.2.4 Cumulative Impacts

Cumulative projects include the effects of existing, current and reasonably foreseeable future projects. As noted above, the proposed project is shown to not significantly increase the overall ambient community noise level and would not expose persons to or generate excessive groundborne vibration or groundborne noise. Therefore, project cumulative impact would be less than significant.

3.13.2.5 Mitigation Measures

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

N-1: Construction noise levels fluctuate depending on the construction phase, equipment types and duration of use; distance between noise source and sensitive receptor; and the presence or absence of barriers between noise source and receptors. Therefore, the RSD should require construction contractors to limit standard construction activities as follows:

- Equipment and trucks used for proposed project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible. In addition, the time allowed for equipment and trucks to idle will be limited to the extent practicable.
- Stationary noise sources shall be located as far from adjacent receptors as possible and shall be muffled and enclosed within temporary sheds, incorporate insulation barriers or other measures to the extent feasible.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for proposed project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. However, where use of pneumatically

powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible. This could achieve a reduction of 5 dBA. Quieter procedures shall be used such as drilling rather than impact equipment whenever feasible.

- Heavy construction equipment operations should be limited during the school period when classrooms are being utilized in the adjacent middle school buildings.
- When heavy construction activities are located within 75 feet of a residential structure, deploy a temporary portable sound barrier between the construction activities and nearest sensitive receptor.

3.13.2.6 Level of Impact After Mitigation

With the implementation of Mitigation Measure N-1, project impact would be less than significant.

3.14 POPULATION AND HOUSING

This section describes the proposed project's potential to affect the population and housing supply within the City of Oxnard.

3.14.1 Environmental Setting

3.14.1.1 Existing Conditions

The population of Ventura County was estimated by the California Department of Finance to be 842,886 in January 2020 (California Department of Finance 2020). Oxnard's 2020 population of 206,352 accounted for 24% of the County's population. Between 2013 and 2020, the City of Oxnard's population increased by 5%, or 5,329 people, representing a 3% increase and a less than 1% average annual growth rate (California Department of Finance 2020).

The SCAG forecast for the City of Oxnard is for a 16% increase between the years 2016 and 2045, representing 32,100 additional residents. The average growth rate for this period is forecast to be less than 1%. In 2016, the population density of Oxnard was estimated at 5,279 residents per square mile. This greatly exceeded the overall Ventura County population density of 388 residents per square mile (California Department of Finance 2020).

The project Site is surrounded by urban environment on three sides, with an auto mall to the south, residential and agricultural land to the north, agricultural land to the east, and residential land use to the west.

3.14.1.2 Regulatory Setting

Federal

There are no applicable federal regulations for population and housing.

State

There are no applicable state regulations for population and housing.

Local

The most relevant City of Oxnard 2030 General Plan Goals and Policies addressing population and housing, and the Conceptual Revised Draft Housing Element (City of Oxnard 2022a) with respect to school expansion, are provided herein.

Goal CD-1.6 Public Facilities. Enhance resident quality of life by providing adequate space for schools, libraries, parks and recreation areas, as well as space for the expansion of public facilities to support the community's vision.

CD 1-10 Jobs-Housing Balance. Consider the effects of land use proposals and decisions on efforts to maintain an appropriate jobs-housing balance ratio.

Neighborhood Stabilization and Revitalization

Goal CD-3 A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.

Goal CD-8.8 Public Facility Service Areas. Provide appropriate service areas for existing and planning public facilities such as museum, secondary and elementary schools, fire stations, branch libraries, community centers, parks, and infrastructure utility for supporting facilities.

Goal ICS-21.1 Accommodating Growth. In coordination with the local school districts, designate sites for new school facilities in order to ensure that the number, type, and location of school facilities are commensurate with growth.

Goal H-2.3 Ensure that residential development sites have appropriate and adequate public and private services and facilities, including wastewater collection and treatment, potable and recycled water supply, utilities, parks, schools, and other neighborhood infrastructure.

3.14.2 Impact Analysis

3.14.2.1 Methodology

The City of Oxnard's significance thresholds include "Education" and the contribution of a project resulting in an exceedance of local public school capacity, in addition to "Population and Housing." As the proposed project consists of the expansion of an existing middle school to accommodate population growth, this threshold does not apply to the proposed project. Therefore, the methodology applied will be the significance thresholds defined in CEQA, as indicated below.

3.14.2.2 Significance Thresholds

The thresholds for population and housing impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

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

3.14.2.3 Project Impacts

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)?

Existing student capacity at RDV is approximately 1,116 students. With construction of the proposed 10 classrooms, student capacity would increase by 250, to approximately 1,366 students. This increase in capacity is needed to accommodate existing and anticipated future enrollment in RSD. Construction workers for the proposed project are expected to be drawn from the local labor pool. During operation, the proposed project would have approximately 95 employees.

The proposed project would not directly induce growth as it does not involve residential development. The proposed project will involve utility undergrounding along public ROWs that will tie into existing City of Oxnard utilities along Collins Street, and will include a 25-foot wide access road running from south to north from Collins Street into the RDV campus. The construction of the proposed infrastructure will not extend into undeveloped areas and as such is not considered to be directly growth-inducing. Therefore, impacts are less than significant.

In general, educational facilities are growth accommodating, not growth inducing. Increased demand for school services is generally linked to changes in local land use patterns such as the construction of new dwelling units and the generation of new jobs that encourages new people to move into the area. No housing is proposed as a part of the proposed project.

The City of Oxnard's cumulative project list contains three new commercial/retail facilities, and projects for "Assembly Use, Oil and Gas Production, and Greenhouse Structures," as listed in Table 2-6, Cumulative Project List. None of the cumulative projects are anticipated to significantly affect the population and housing resources within the City. Since the proposed project will not generate a need for housing there would be no cumulative impact to housing resources.

The proposed project may generate some new jobs associated with the school expansion. Additional staff may include teachers, administrative, and support staff. However, RDV is an existing active middle school, so new jobs associated with the proposed project would be minimal. Most or all the potential additional staff could be hired from the existing qualified applicant pool already residing within or within reasonable commuting distance of the RSD. However, if teachers or other staff are hired outside the RSD area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the local population. Given the location of the project Site within an existing developed urban environment, the proposed project is not anticipated to be growth inducing outside of what is anticipated in the City of Oxnard General Plan (City of Oxnard 2016) and Ventura County General Plan (Ventura County 2020c). Therefore, project impacts would be less than significant.

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

The proposed project is a middle school expansion resulting in the addition of 250 students to an existing middle school and would therefore not result in the displacement of people or housing. Therefore, no construction or replacement housing would be necessary and project impacts would be less than significant.

3.14.2.4 Cumulative Impacts

The proposed project would not add a substantial number of new jobs. The students and staff located in the expanded middle school facilities are included in existing and forecasted population growth for the City of Oxnard. The proposed project would support existing and future students and infrastructure improvements would not indirectly cause an increase in population growth. Therefore, proposed project contribution for a cumulative impact would be less than significant.

3.14.2.5 Mitigation Measures

No Mitigation Measures are required.

3.14.2.6 Level of Impact After Mitigation

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

3.15 PUBLIC SERVICES

This section describes the proposed project's potential to affect public services including fire protection, police protection, and parks.

3.15.1 Environmental Setting

3.15.1.1 Existing Conditions

Fire Protection

The project Site is located in unincorporated Ventura County. However, City of Oxnard Fire Station 7 is the initial responding station based on mutual aid agreements between the City of Oxnard and Ventura County. Oxnard Fire Station 7 is co-located with Ventura County Fire Station 51 on the same property. However, County Fire Station 51 is not staffed full-time; therefore, the City of Oxnard covers the nearby County area, including the Site (City of Oxnard Fire Department 2022a).

Assuming the project Site is annexed into the City of Oxnard, emergency and non-emergency services would be permanently provided by the City of Oxnard Fire Department. Services provided to the Oxnard community include fire suppression, emergency medical service, urban search and rescue, hazardous material response, vehicle and industrial accident response, ocean and surf rescue, fire investigation, public fire and life safety education, records management, regulation of hazardous material uses, community disaster response training, disaster preparedness, and review and inspection of new construction. The mission of the Oxnard Fire Department is to serve the public and safeguard the community by preventing or minimizing the impact of emergency situations to life, the environment, and property by responding to both emergency and non-emergency calls for service. There are eight fire stations in the City of Oxnard and the nearest Fire Station to the project Site is Station 7. Based on email communications with Deputy Fire Marshall James Blanchard, Station 7 would provide emergency and non-emergency services to the project Site (City of Oxnard Fire Department 2022b). In 2021, Station 7 responded to 2,938 calls for service. The Oxnard Fire Department as a whole had 19,227 individual unit responses in the year 2021. The locations of Fire Stations within the City and the approximate distance of the stations to the project Site are shown in Table 3-22.

Table 3-22. Fire Station Locations

Station Number	Address	Approximate Driving Distance to Project Site
1	491 South "K" Street Oxnard, CA 93030	5.7 miles
2	531 East Pleasant Valley Road Oxnard, CA 93030	7.1 miles
3	150 Hill Street Oxnard, CA 93030	4.8 miles
4	230 West Vineyard Avenue Oxnard, CA 93030	2.2 miles
5	1450 Colonia Avenue Oxnard, CA 93030	2.7 miles
6	2601 Peninsula Road Oxnard, CA 93030	8.9 miles
7	3300 Turnout Park Circle Oxnard, CA 93036	1.2 miles

Station Number	Address	Approximate Driving Distance to Project Site
County Station 51	3302 Turnout Park Circle Oxnard, CA 93036	1.2 miles
8	3000 South Rose Avenue Oxnard, CA 93033	4.9 miles

Source: Distances estimated utilizing Google Earth Pro 2018 from the Station site to 3100 North Rose Avenue

Police Protection

The project Site is located in unincorporated Ventura County and police protection currently is provided by the Ventura County Sheriff's Department. The Ventura Headquarters of the Sheriff's Department, located at 800 N. Victoria Avenue, Ventura, CA 93009, serves the community of El Rio and the project Site. A total of 29 sworn and four civilian support staff are assigned to the station. Each patrol shift consists of a minimum of three deputies and one sergeant as the acting supervisor. During the week, there is also a school resource officer who handles any incidents that occur at Rio Mesa High School and RDV Middle School (Ventura County Sheriff 2022).

Assuming the project Site is annexed into the City of Oxnard, police protection services would be permanently provided by the City of Oxnard Police Department. The Oxnard Police Department is located at 251 South "C" Street, Oxnard, CA 93030, and employs 240 sworn officers and 122 civilian staff under the leadership of Chief of Police Jason Benites (Oxnard Police Department 2022).

As the City's population grows, police service calls would be expected to increase. However, as shown in Table 3-23, the total calls for service within the City of Oxnard have decreased each of the past three years. In 2021, police officers responded to 86,759 calls for service, an approximately 14% decrease from the previous year. Oxnard Police Department maintained a response time to Priority One plus (P1+) service calls that averaged 3 minutes and 46 seconds. This call category includes those calls that pose the greatest threat to life and safety, such as injury, traffic collisions, aggravated assaults, and in-progress crimes. Recorded response times by the Oxnard Police Department by priority for 2019–2021 are provided in Table 3-23 (City of Oxnard Police Department 2022).

Table 3-23. Oxnard Police Department Response Times for 2019-2021

Priority Number	2019		2020		2021	
	Call Count	Response Time (Minutes)	Call Count	Response Time (Minutes)	Call Count	Response Time (Minutes)
P1+	236	0:03:34	269	0:05:34	215	0:03:46
P1	35,022	0:09:38	35,111	0:14:22	36,743	0:09:21
P2	31,380	0:33:28	27,429	0:32:13	26,195	0:25:08
P3	33,637	0:51:52	34,670	0:49:02	33,145	0:45:42
P4	676	0:23:36	2,987	N/A	461	0:29:20
Total	100,951		100,466		86,759	

Parks

The City of Oxnard Parks Division maintains the City's 53 parks that cover over 500 acres. The Parks Department focuses on park improvements, growth, and enrichment to foster the bonds of neighborhoods, create a destination for adult and youth recreation, and beautify the community environment (City of Oxnard 2022a). The City of Oxnard Parks and Recreation Master Plan was adopted by the Oxnard City Council on February 16, 2021 (City of Oxnard 2022a). The three closest public parks to the project Site are: East Park, 1.4 miles to the northwest, Central Park, 1.9 miles to the northwest, and Rio Lindo Park, 2.9 miles to the south (Google Maps 2022).

3.15.1.2 Regulatory Setting

Federal

There are no applicable federal regulations for public services.

State

There are no applicable state regulations for public services.

Local

The City of Oxnard 2030 General Plan Goals and Policies for infrastructure and community services (ICS) for fire protection, police protection, and park services most relevant to the proposed project are provided herein.

Goal ICS-1	Provision of adequate facilities and services that maintain service levels with adequate funding.
ICS-1.1	Maintain Existing Service Levels
ICS-1.3	Funding for Public Facilities
ICS-1.4	Infrastructure Conditions of Approval
Goal ICS-19	Adequate and effective law enforcement and the incorporation of crime prevention features in developments.
ICS-19.2	Police Review of Development Projects: Continue to require the Police Department to review proposed development projects and provide recommendations that enhance public safety.
ICS-19.4	Crime Prevention Device Requirements: Require crime prevention devices (e.g., deadbolt locks, peepholes, etc.) in all new development.
ICS-19.5	Incorporating Security Design Principles: Encourage crime prevention and defensible space through design principles such as those employed through the National Crime Prevention through Environmental Design program, Neighborhood Watch Program, and/or other appropriate methods to enhance public safety.
ICS-19.7	New Development: Require new development to fund a fair share extension of police services to maintain service standards, including personnel and capital improvement costs.
ICS-19.8	Response Time: Achieve and maintain an average response time of five (5) minutes or less for priority one calls.
Goal ICS-20	Protected public through effective fire prevention services and the incorporation of fire safety features in new development.
ICS-20.1	Fire Response Time: Achieve and maintain a response time of five minutes 90% of the time as a goal for service call response and siting of new fire stations.

- ICS-20.5 Fire Services to New Development:** Require new development to fund a fair share extension of fire services to maintain service standards, including personnel and capital improvement costs.
- ICS-20.7 Adherence to City Standards:** Ensure that water main size, water flow, fire hydrant spacing, and other fire facilities meet City standards.
- ICS-20.8 Development Review:** Review new development applications to assess potential impacts to existing fire protection services and the need for additional and expanded services.
- ICS-20.10 Adequate Emergency Access and Routes:** Require that new development provide adequate access for emergency vehicles, particularly firefighting equipment, and evacuation routes, as appropriate.
- Goal ICS-23** A full range of recreational facilities and services accessible to all Oxnard residents, workers, and visitors.
- ICS-23.1 City Park and Recreation Standards:** Provide park and recreation facilities at a level that meets the standards for neighborhood and community parks as shown in Table 3-24.

Table 3-24. City Park and Recreation Standards

Type of Park	Net Acres/1,000 Residents	Min. Net Acres/Park	Service Radius
Mini/Pocket	No standard	No standard	1/3 mile
Neighborhood	1.5	5	1/2-1 mile
Community	1.5	20	1-1 1/2 miles
Total	3.0	N/A	N/A

- ICS-23.4 Collocation of Parks and Schools:** Future neighborhood park sites shall be located next to school sites whenever feasible.

3.15.2 Impact Analysis

3.15.2.1 Methodology

The City of Oxnard CEQA guidelines for public services that include fire protection, law enforcement, and recreation/parks provides for the use appropriate service generation factors or input from service providers to determine the anticipated demand of the proposed project for these public services. For an analysis of proposed project impact, a determination must be made of whether the increase in demand is within the capabilities of existing facilities or whether new or expanded facilities would be needed. Any needed new personnel would constitute a potentially significant environmental impact only if the need for new personnel may necessitate the construction of new facilities or expansion of existing facilities, the construction of which may have significant environmental effects.

3.15.2.2 Significance Thresholds

The thresholds for public service impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities,*

the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

- i) Fire Protection?*
- ii) Police Protection?*
- iii) Parks?*

3.15.2.3 Project Impacts

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

i) Fire Protection?

The Site is located in unincorporated Ventura County. However, City of Oxnard Fire Station 7 is the initial responding station based on mutual aid agreements between the City of Oxnard and Ventura County. The proposed project would be designed and constructed to meet required fire standards that would include adequate emergency vehicle access. Construction would comply with OSHA and Fire and Building Codes. The Oxnard Fire Department has been consulted regarding project Site design, access, and fire hydrants.

Operation of the middle school facility is anticipated to generate a typical range of service calls including fire suppression, emergency medical, and emergency rescue requests for service. Fire Station 7, located at 3300 Turnout Park Circle, which houses Engine 67, is 1.2 miles from the project Site. This station is close enough to provide fire protection and hazardous materials response services within a reasonable response, or “turnout” time in accordance with local goals and policies. The travel time goal for a first response is 4 minutes (240 seconds). For the period January 1, 2021 to September 1, 2022, turnout time for Engine 67 was 382 seconds (6 minutes and 36 seconds) and met the goal of 240 seconds approximately 15% of the time out of 312 service calls (City of Oxnard Fire Department 2022c). Within that time period, no calls were documented from the project Site. While the response times for the initial responding fire station are slightly outside the goal time for first response, the incremental increase in fire response requirements associated with the proposed project is anticipated to be negligible and would not result in the need for new or altered facilities. Further, given the presence of County Fire Station 51, collocated with City Fire Station 7, service ratios would continue to be acceptable. Therefore, project impact on fire protection services would be less than significant.

ii) Police Protection?

The RSD and its construction manager shall direct the contractor to properly fence the project Site during construction of the middle school facilities. The fence will help to reduce the potential for materials and equipment to be targets of theft that could result in a need for increased police services during construction.

The existing and expanded middle school facilities will continue to be within the service boundary of the Ventura County Sheriff's Department until annexation into the City of Oxnard, at which time service will be provided by the Oxnard Police Department. The middle school facilities are proposed to accommodate both existing and anticipated future enrollment. Public funds, such as property taxes, would be used to cover the incremental costs associated with providing police services for future enrollment at the middle school facilities. The proposed project would not require the expansion of existing police facilities or the construction of new facilities. As a result, the proposed project would result in a less than significant impact related to police protection during construction and long-term operation.

iii) Parks?

Demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. No housing is planned as a part of the proposed project. The proposed project would generate some new jobs. Additional staff would include teachers, administrative, and support staff. Most or all of the additional staff could be hired from the existing qualified applicant pool already residing within or near the RSD. However, if teachers or other staff are hired outside the RSD area to fill a specific role(s), it may result in a few new people and their families moving into surrounding neighborhoods, thus creating a slight increase in the local population. The proposed project is needed to accommodate existing and anticipated future enrollment in RSD and includes recreational facilities designed to meet the recreational needs of students and faculty on-Site. Recreational facilities to be provided on the expanded campus include a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts. The recreational facilities will be available to the public outside of school hours and will likely lessen the physical impacts/demand on nearby park and recreational facilities as opposed to increasing the demand. New park facilities will not be needed; therefore, project impact would be less than significant.

3.15.2.4 Cumulative Impacts

Fire and Police Protection

The proposed project would cause an incremental increase in demand for fire and police protection services. Consistent with General Plan Policy ICS-1.3, the City will continue to utilize developer fees, public facilities fees, and other methods (e.g., grant funding or assessment districts) to finance public facility design, construction, operation, and maintenance to ensure adequate levels of service (City of Oxnard 2017). Therefore, proposed project contribution to cumulative impacts for fire and police protection services would be less than significant.

Parks

The proposed project is a middle school expansion that would provide adequate recreational facilities on Site to meet students' educational needs. Increased demand for park and recreational facilities are typically linked to an increase in population growth in the area through the development of new housing units or the generation of new jobs. City of Oxnard Municipal Code Chapter 13 Article IV includes a park acquisition and development tax for each new dwelling unit. The revenue collected from this tax goes into the park acquisition and development fund. No housing is planned as a part of the proposed project, and a minimal increase in the local population is expected. Additionally, recreational facilities proposed for community use would have a positive cumulative effect on park facilities. Therefore, proposed project contribution to cumulative impacts for parks would be less than significant.

3.15.2.5 Mitigation Measures

No Mitigation Measures are required.

3.15.2.6 Level of Impact After Mitigation

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

3.16 TRANSPORTATION

This section provides a discussion of existing transportation conditions and an analysis of potential impacts on traffic conditions from implementation of the proposed project. This section is based on information provided in the Traffic and Circulation Study (TCS) for the RDV Campus Expansion Master Plan (proposed project) prepared by Stantec (Stantec 2022b). The TCS is included in Appendix I of this EIR.

3.16.1 Environmental Setting

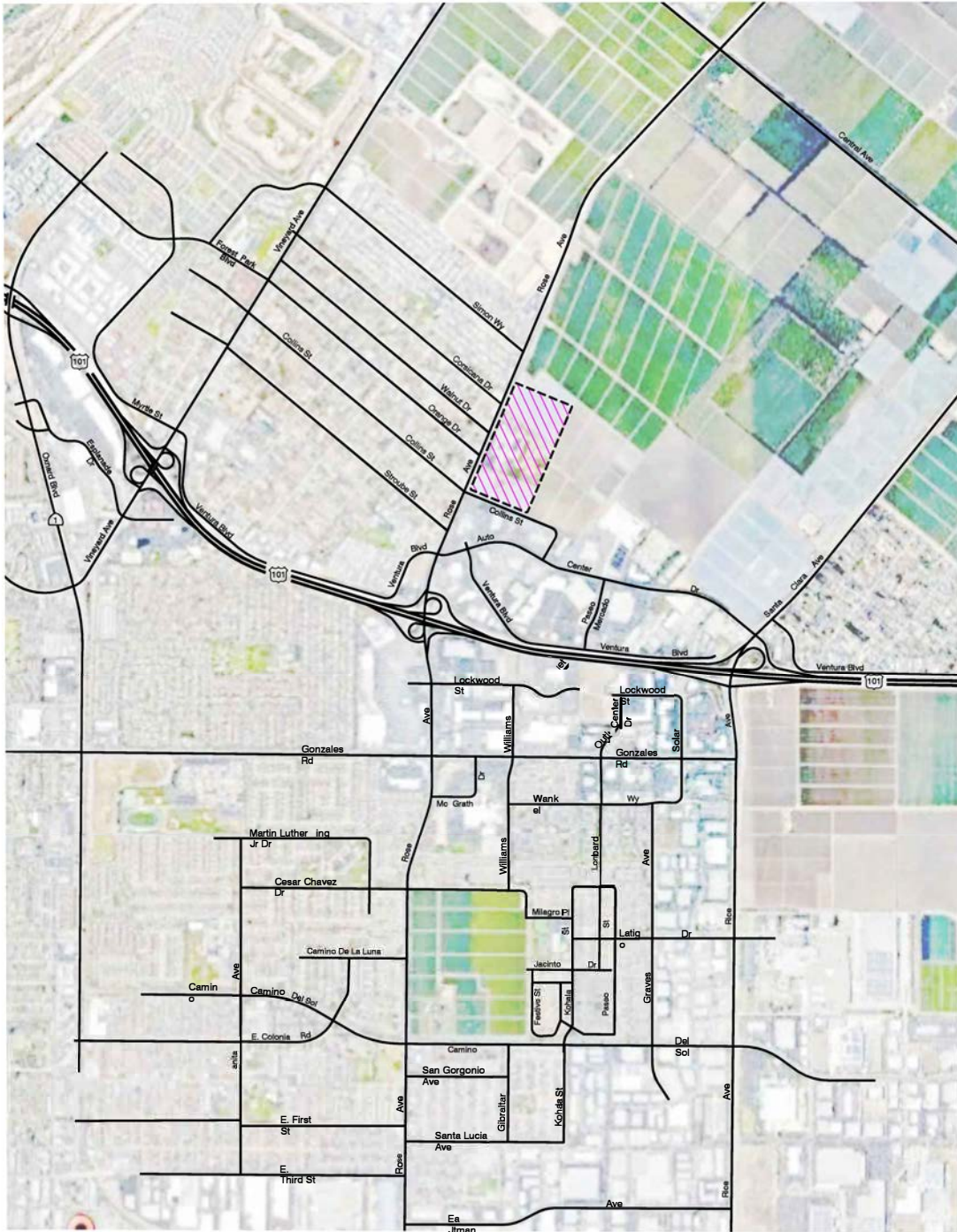
3.16.1.1 Existing Conditions

The roadway system in the study area is comprised of a network of freeways, arterials and collectors. The study-area roadway network is shown in Figure 3-10 and a brief description of the major components is provided below.

- **U.S. Highway 101 (U.S. 101)** extends along the Pacific Coast between Los Angeles and San Francisco. Within the City of Oxnard, the six to eight-lane freeway is the principal route between Oxnard and the cities of Ventura and Santa Barbara to the north, and the cities of Camarillo, Thousand Oaks and Los Angeles to the south. Regional access from U.S. 101 to the project site is provided via the interchange with Rose Avenue.
- **Rose Avenue** is a north-south secondary arterial roadway that extends from Pleasant Valley Road south of Oxnard to Los Angeles Avenue (SR 118) in the County of Ventura. North of Ventura Boulevard the roadway contains four travel lanes with a raised or painted median and left-turn lanes at intersections. The speed limit adjacent to the school is 45 MPH. The roadway provides direct access to the project site via its intersections with Orange Avenue and Walnut Drive. The intersections with Auto Center Drive, Collins Street, Walnut Drive, Simon Way, and Central Avenue are signalized.
- **Rice Avenue** is a north-south arterial that provides regional access to the project Site from the east. In addition, it serves the Nyeland Acres Community, the Northeast Industrial Area and the southeast residential areas. The segment between the U.S. 101 interchange and the Oxnard Boulevard interchange has been include in the Highway System (SR 1); however, signals are operated by the City. South of Gonzales Road, the roadway contains three southbound, a raised median and two northbound lanes. The roadway will be widened as part of redevelopment of the Sakioka Farms Specific Plan. All major intersections are signalized.
- **Vineyard Avenue (S.R. 232)** is a north-south four- to six-lane arterial roadway that extends from Oxnard Boulevard to Los Angeles Avenue (SR 118) in Ventura County.
- **Auto Center Drive** is an east-west four-lane roadway with a raised median and left-turn lanes at intersections. The posted speed limit on Auto Center Drive is 40 MPH and on-street parking is prohibited. Auto Center Drive terminates on the east at Santa Clara Avenue and on the west at Rose Avenue.

Alternative Transportation

Public Transit. Bus service in the project area is provided by Gold Coast Transit Route 15, which provides a connection between the Riverpark Specific Plan Area and St. John's Regional Medical Center but does not have a bus stop in the vicinity of the project Site. School bus service routes throughout the El Rio neighborhood is provided by the RSD.



Legend



- Project Site



Source: Stantec 2022b, Exhibit 1, Existing Street Network / Project Site Location, Page 2

Rio Del Valle Middle School

Existing Street Network / Project Site Location

Rio Del Valle Environmental Impact Report



TETRA TECH

5383 Hollister Ave., Suite 130
Santa Barbara, CA 93111

TC NO.
41651

DATE
09/07/2022

DRAWN BY
BURSON

MAP NO.

FIGURE
3-10

Bicycle Network. The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. This project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. Consideration should be given to install buffered bicycle lanes where feasible to provide increased separation between vehicle and bicycle lanes. Traffic signal improvements at the Rose Avenue/Walnut Drive intersection should include timing verification to accommodate bicycle movements. Improvements on Collins Street may include provision of Class II bike lanes or installation of sharrows and shared road signage.

One roadway segment and nine intersections were selected for analysis in consultation with County and City staff. New traffic counts were collected on January 26 and March 1, 2022. The lane geometry and control for the intersections within the study area are included in the Technical Appendix for the TCS (Exhibit 3) and the traffic volumes are illustrated in the Technical Appendix for the TCS (Exhibit 4). Levels of service were calculated the level of service methodology outlined previously. The technical calculation worksheets are included in the Technical Appendix, and the existing roadway and intersection levels of service are summarized in Tables 3-25 and 3-26.

Table 3-25. Existing Roadway Levels of Service

Roadway Segment	Classification	Number of Lanes	Existing ADT	LOS C Threshold	Existing LOS
Rose Ave n/o Simon Way	Class I	4 lanes	12,800 ADT	38,000 ADT	LOS A
Rose Ave n/o Walnut Dr	Class I	4 lanes	15,500 ADT	38,000 ADT	LOS A

Table 3-26. Existing a.m. and p.m. Peak Hour Intersection Levels of Service

Intersection	Jurisdiction	Control	a.m. Peak Hour V/C - LOS	p.m. Peak Hour V/C - LOS
1. Rose Ave/Central Ave	County	Signal	0.64/LOS B	0.55/LOS A
2. Rose Ave/Simon Wy	County	Signal	0.37/LOS A	0.32/LOS A
3. Rose Ave/Walnut Dr	County	Signal	0.43/LOS A	0.28/LOS A
4. Rose Ave/Orange Dr ¹	County	One-way stop	19.3 sec/LOS C	12.1 sec/LOS B
5. Rose Ave/Collins St	Oxnard	Signal	0.44/LOS A	0.40/LOS A
6. Rose Ave/Stroube St ¹	Oxnard	One-way stop	18.9 sec/LOS C	13.7 sec/LOS B
7. Rose Ave/Ventura Blvd-Auto Center Dr	Oxnard	Signal	0.50/LOS A	0.63/LOS B
8. Auto Center Dr/Collins St ¹	Oxnard	One-way stop	13.8 sec/LOS B	28.4 sec/LOS D
9. Santa Clara Ave/Ventura Blvd	Oxnard	Signal	0.31/LOS A	0.34/LOS A

Notes: ¹ Unsignalized intersection: level of service based on seconds of delay on minor street

Table 3-25 indicates that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue operates in the LOS A range. Table 3-26 indicates that the study-area intersections operate in the LOS A-C range except the Auto Center Drive/Collins Street intersection, which operates at LOS D, which is below the City of Oxnard LOS C standard.

3.16.1.2 Regulatory Setting

Federal

There are no relevant federal transportation and circulation regulations applicable to the proposed project.

State

2016–2040 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS).

SCAG is the designated Metropolitan Planning Organization (MPO) for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties. SCAG is mandated by the federal government to develop a multimodal long-range transportation plan that provides a 20-year vision for investing in our transportation system and update it at least once every four years. The 2016–2040 RTP/SCS, addresses all modes of our transportation system, and reflects research and policy initiatives from each mode: active transportation, aviation and airport ground access, corridor planning, goods movement, high-speed rail, intelligent transportation systems, safety and security, transit, and transportation finance (SCAG 2017).

Congestion Management Program

Ventura County Transportation Commission (VCTC) is the designated Congestion Management Authority (CMA) for Ventura County and is responsible for coordinating land use, transportation planning, and air quality to mitigate traffic congestion (VCTC 2017). The Congestion Management Program (CMP) provides local agencies and private developers the procedures and tools necessary to manage and decrease traffic congestion in the County (VCTC 2009).

Local Regulations

The City of Oxnard Public Works Division collects traffic impact fees based on project generated traffic that would impact roadways within the City's jurisdiction. Standard conditions of permit issuance initiate collection of these fees for all projects within the City of Oxnard, regardless of whether the project is a private or a public project.

3.16.2 Impact Analysis

3.16.2.1 Methodology

Traffic Analysis Scenarios

Pursuant to County of Ventura and City of Oxnard traffic study requirements, the traffic analysis includes the following traffic scenarios:

- Existing Conditions;
- Existing plus Project Conditions;
- Cumulative Conditions; and
- Cumulative plus Project Conditions.

Level of Service Criteria

A LOS ranking scale is used to identify the operating condition on roadways and at intersections. This scale compares traffic volumes to intersection capacity and assigns a letter value to this relationship. The letter scale ranges from A to F with LOS A representing free flow conditions and LOS F representing congested conditions. The level of service criteria is summarized in Table 3-27.

Table 3-27. Intersection Level of Service Criteria

LOS	Signalized Intersections (V/C Ratio)	Signalized Intersections (Sec. of Delay)	Unsignalized Intersections (Sec. of Delay)	Definition
A	< 0.60	≤ 10	≤ 10	Conditions of free unobstructed flow, no delays and all signal phases sufficient in duration to clear all approaching vehicles.
B	0.61 – 0.70	> 10 and ≤ 20	> 10 and ≤ 15	Conditions of stable flow, very little delay, a few phases are unable to handle all approaching vehicles.
C	0.71- 0.80	> 20 and ≤ 35	> 15 and ≤ 25	Conditions of stable flow, delays are low to moderate, full use of peak direction signal phases is experienced.
D	0.81 – 0.90	> 35 and ≤ 55	> 25 and ≤ 35	Conditions approaching unstable flow, delays are moderate to heavy, significant signal time deficiencies are experienced for short durations during the peak traffic period.
E	0.91 – 1.00	> 55 and ≤ 80	> 35 and ≤ 50	Conditions of unstable flow, delays are significant, signal phase timing is generally insufficient, congestion exists for extended duration throughout the peak period.
F	> 1.00	> 80	> 50	Conditions of forced flow, travel speeds are low, and volumes are well above capacity. This condition is often caused when vehicles released by an upstream signal are unable to proceed because of back-ups from a downstream signal.

Source: TRB 2016

The City of Oxnard considers LOS C or better acceptable for intersection operations, with LOS D acceptable at the following intersections only:

- Oxnard Boulevard with Gonzales Road;
- Oxnard Boulevard with Vineyard Avenue;
- Rose Avenue with Gonzales Road;
- Wooley Road with Oxnard Boulevard/Saviers Road (Five Points); and
- Wooley Road with C Street.

Level of Service Calculation Methodology

The analysis for roadway segments and intersections located in Ventura County is completed conform to the *Ventura County Initial Study Assessment Guidelines Section 27a(1). Transportation & Circulation – Roadways and Highways – Level of Service (LOS)*.

Roadway levels of service are calculated by comparing the average daily traffic (ADT) to the roadway segment's design capacity. The levels of service for signalized intersections are based on the Intersection Capacity Utilization

(ICU) method and the service flow rates adopted by the County from the VCTC for the CMP. The CMP level of service criteria are included in the Technical Appendix I. Unsignalized intersection are analyzed pursuant the methodologies outlined in the Highway Capacity Manual (HCM) (TRB 2016), and intersection levels of service are reported based on seconds of delay on the stopped intersection approaches.

Levels of service for intersections are calculated for the peak hour within the 7 a.m. to 9 a.m. commute period and the 4 p.m. to 6 p.m. commute period. K-8 schools generate traffic in the a.m. period from 7:30 a.m. to 8:30 p.m., with virtually no traffic generated outside that peak hour. Previous counts collected along Rose Avenue indicate that the p.m. peak hour occurs from 4:30 p.m. to 5:30 p.m., which falls within the 4 p.m. to 6 p.m. commute count period.

3.16.2.2 Significance Thresholds

Pursuant to CEQA guidelines, a VMT analysis and an evaluation of consistency with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was prepared in support of the proposed project's EIR. The VMT analysis (Stantec 2022a) is provided in Appendix I. Because project-specific impacts are not evaluated anymore using vehicle delay (V/C increase or seconds of delay), the traffic impact analysis focuses on consistency with local plans, ordinances or policies establishing measures of effectiveness for the performance of the circulation system.

County of Ventura. The County of Ventura considers LOS C the minimum level of service for local roads and LOS D the minimum level of service for County thoroughfares, with the less stringent minimum level of service applied to intersections between local roads and thoroughfares.

City of Oxnard. The City has adopted LOS C as the threshold of significance for intersections during environmental review.

The City of Oxnard's criteria for evaluating project impacts at intersections is based upon the change in volume-to-capacity ratio attributable to the project. The City of Oxnard has adopted the following guidelines to prepare a traffic study and determine a project's effects on intersections (per City Resolution No. 10,453).

Traffic studies shall include a list of intersections where the project will worsen the ICU numeric value of LOS by V/C 0.02 or more. This ICU list shall include intersections projected to be at LOS C with background traffic (existing plus approved plus pending projects) and LOS D, E, or F with background traffic plus project generated traffic.

At intersections where the project increases the ICU by .02 to .039, a list shall be prepared that identifies the improvements necessary to mitigate the identified project impact. City staff will then determine the amount of participation from the project for the necessary improvements. The developer shall mitigate the project's impacts to the circulation system by:

1. Construction of all master-planned facilities within the project area, consisting of half the master planned roadways abutting the project area, plus one lane. "Roadways" include related improvements, such as sidewalks, curbs, gutters, and drainage facilities. "Project Area" means the area shown on the approved plans.
2. Construction of all improvements necessary to mitigate impacts to intersections that the ICU list shows will be worsened by .02 or more (subject to mitigation fee limit).

The thresholds for transportation impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

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

- *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*
- *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- *Would the project result in inadequate emergency access?*

3.16.2.3 Project Impacts

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

As noted above, the 2016–2040 RTP/SCS, addresses all modes of our transportation system, and reflects research and policy initiatives from each mode: active transportation, aviation and airport ground access, corridor planning, goods movement, high-speed rail, intelligent transportation systems, safety and security, transit, and transportation finance (SCAG 2017). The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. Table 3-28 provides a project consistency analysis with relevant 2016 RTP/SCS goals identified by SCAG.

Table 3-28. 2016 RTP/SCS Consistency Analysis

Policy	Consistency Analysis
<p>RTP/SCS G1: Align the plan investments and policies with improving regional economic development and competitiveness;</p> <p>RTP/SCS G7: Actively encourage and create incentives for energy efficiency, where possible; and,</p> <p>RTP/SCS G9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.</p>	<p>Not Applicable: The proposed project would provide public educational services and would not be creating regional land use policies that could impact regional economic development, energy efficiency policies, or security improvements to the regional transportation system.</p>
<p>RTP/SCS G2: Maximize mobility and accessibility for all people and goods in the region;</p> <p>RTP/SCS G3: Ensure travel safety and reliability for all people and goods in the region;</p> <p>RTP/SCS G4: Preserve and ensure a sustainable regional transportation system;</p> <p>RTP/SCS G5: Maximize the productivity of our transportation system;</p> <p>RTP/SCS G6: Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking); and,</p> <p>RTP/SCS G8: Encourage land use and growth patterns that facilitates transit and active transportation.</p>	<p>Consistent: The proposed project is an expansion of an existing middle school to meet the educational needs of RSD students. The project Site is an existing middle school campus surrounded by existing residential development. The proposed project includes required roadway improvements needed to provide adequate service to the project Site as identified in Section 2.3 and evaluated herein in Section 3.16. It is anticipated that students attending the expanded middle school will come from the surrounding neighborhood and would be able to utilize a variety of transportation modes including walking, bicycling, bus and/or vehicles on the local roadway network.</p>

A TCS was prepared for the proposed project (see the TCS in Appendix I). As part of the TCS, traffic counts were collected at one roadway segment and nine intersections for a.m. and p.m. peak hours. Trip generation estimates were determined for the project Site based on anticipated enrollment and standard trip generation rates. The trip

generation was coordinated with City of Oxnard staff. Trips were distributed based on school routes and student information. The TCS calculated intersection LOS for existing conditions and cumulative conditions with and without the proposed project. Cumulative conditions were developed based on a list of related (approved and pending) projects provided by City of Oxnard staff and 2030 General Plan traffic data from the Oxnard Traffic Model (OTM).

Project Trip Generation

Middle School. The existing middle school has a student enrollment of 819 students. The project could potentially result in a 250-student increase. Trip generation estimates for the middle school were calculated based on rates contained in the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (ITE 2017) for *Land Use #522 – Middle School/Junior High School*.

District Transportation and Parking Facility. The project also includes the relocation of the DTPF from E. Vineyard Avenue to N. Rose Avenue. While the relocation would not add traffic to the regional roadway network, it would divert bus and employee trips to the immediate vicinity of the middle school site and its driveways. The DTPF operational statistics provided by RSD are as follows:

- 17 school buses in service. All buses will be parked at the DTPF.
- Bus traffic consists of 13 a.m. bus routes, four midday bus routes and 13 p.m. bus routes, for a total 30 buses per school day.
- Total of 10 office/maintenance employees, work times 6:30 a.m. to 3:30 p.m.

The existing middle school is served by six school buses which currently enter the Site and leave to the existing facility on E. Vineyard Avenue after dropping off students. In the future, these six buses will leave the Site to start student pick-up routes and remain on the Site after returning to drop off students.

Table 3-29. Project Trip Generation

Land Use	Size/Variable	ADT	a.m.			p.m.		
			In	Out	Total	In	Out	Total
Middle School	rate/student	2.10	0.36	0.31	0.67	0.072	0.078	0.15
	250 students	525	90	78	168	18	20	38
District Transportation and Parking Facility (DTPF)	ex. Site Count	267	26	4	30	4	6	10
Total		792	116	82	198	22	26	48

Notes: Bell schedule for a normal school day is 8:21 a.m. to 2:53 p.m.

Transportation Facility ADT assumes half of counted vehicles is bus/heavy vehicle ($178 \text{ ADT} \times 1.5 = 267 \text{ ADT}$).

Transportation Facility a.m. and p.m. peak hour trip (PHT) assumes 100% of counted vehicles is bus/heavy vehicle ($15 \text{ a.m. PHT} \times 2.0 = 30 \text{ a.m. PHT}$, $5 \text{ p.m. PHT} \times 2.0 = 10 \text{ p.m. PHT}$).

As shown in Table 3-29, the project is expected to generate 792 ADT, with 198 trips occurring in the a.m. peak hour and 48 trips occurring in the p.m. peak hour.

Project Trip Distribution

The project trip distribution for new students is based on the school's attendance boundary illustrated in the TCS (Exhibit 5), with a smaller percentage of trips generated from outside the attendance boundary by new school employees. There is no indication that existing bus routes are subject to change, thus the regional distribution of DTPF trips would not change except in the immediate vicinity of the Site. The distribution percentages are shown in the TCS (Exhibit 6). The site access changes (addition of full-access driveway on Collins Street) would result in

changes to existing middle school traffic patterns, where traffic from and to the south now have the option to use the new driveway on Collins Street instead of the existing driveways on Rose Avenue. Exhibit 7 in the TCS shows the anticipated existing diverted traffic volumes and Exhibit 8 in the TCS shows the project-added traffic volumes. Exhibit A in Appendix 2 of the TCS shows the separate middle school trips and District maintenance/bus trips.

Existing Plus Project Roadway and Intersection Operations

Project generated traffic was added to the existing peak hour traffic volumes and levels of service were recalculated for existing plus project conditions. The existing plus project traffic volumes are illustrated in the TCS (Exhibit 9). Table 3-30 and Table 3-31 summarize the level of service calculations for existing plus project-specific conditions.

Table 3-30. Existing + Project Roadway Levels of Service

Roadway Segment	Classification	Number of Lanes	Existing + Project ADT	LOS C Threshold	Existing LOS
Rose Ave n/o Simon Way	Class I	4 lanes	12,863 ADT	38,000 ADT	LOS A
Rose Ave n/o Walnut Dr	Class I	4 lanes	15,587 ADT	38,000 ADT	LOS A

Table 3-31. Existing + Project a.m. and p.m. Peak Hour Intersection Levels of Service

Intersection	Jurisdiction	Control	a.m. Peak Hour V/C - LOS	p.m. Peak Hour V/C - LOS
1. Rose Ave/Central Ave	County	Signal	0.64/LOS B	0.55/LOS A
2. Rose Ave/Simon Wy	County	Signal	0.38/LOS A	0.32/LOS A
3. Rose Ave/Walnut Dr	County	Signal	0.43/LOS A	0.28/LOS A
4. Rose Ave/Orange Dr ¹	County	One-way stop	19.5 sec/LOS C	13.1 sec/LOS B
5. Rose Ave/Collins St	Oxnard	Signal	0.44/LOS A	0.40/LOS A
6. Rose Ave/Stroube St ¹	Oxnard	One-way stop	22.9 sec/LOS C	14.3 sec/LOS B
7. Rose Ave/Ventura Blvd-Auto Center Dr	Oxnard	Signal	0.52/LOS A	0.63/LOS A
8. Auto Center Dr/Collins St ¹	Oxnard	One-way stop	14.9 sec/LOS B	31.6 sec/LOS D
9. Santa Clara Ave/Ventura Blvd	Oxnard	Signal	0.32/LOS A	0.34/LOS A

Notes: ¹ Unsignalized intersection: level of service based on seconds of delay on minor street.

Tables 3-30 and 3-31 indicate that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range, and that the study-area intersections would continue to operate in the LOS A-C range except the Auto Center Drive/Collins Street intersection, which operates at LOS D. The proposed project would contribute to the delays experienced on the stopped approach (Collins Street). Mitigation Measures TRAF-1, TRAF-2, and TRAF-3 have been added to reduce potentially significant project-specific traffic impacts to a less than significant level.

Cumulative Conditions

The City of Oxnard requires that the study-area intersections are analyzed assuming cumulative traffic conditions, which include traffic that could be generated by other developments in the study area that are expected to be

constructed in the near future. The following section discusses the cumulative (existing conditions plus approved and pending projects) conditions.

Cumulative Projects Trip Generation and Distribution

The cumulative (existing plus approved and pending projects) conditions serves as a near future baseline to assess potential impacts generated by the proposed project. Cumulative traffic volumes were developed based on approved and pending projects information provided by City of Oxnard and County of Ventura staff.

A list of approved and pending development projects in the City of Oxnard was provided by City staff (City of Oxnard 2022a). The location map and *Development Project List* information for the approved and pending projects is included in Appendix 4 of the TCS. The County's Resource Management Agency (RMA) staff provided a parcel map with approved and pending projects within a five-mile radius of the project site. The parcel map information was compared with the project information contained in the County's Approved Projects list and the Pending Project list (County of Ventura 2022b).

Trip generation estimates for the approved and pending projects were developed based on rates contained in the ITE Trip Generation Manual and trips were distributed based on the location of each project, project distribution data contained in traffic studies completed for several approved and pending projects, and existing traffic patterns in the study area. The cumulative-added volumes are illustrated in Exhibit B in Appendix 2 of the TCS and the cumulative (existing plus approved and pending) traffic volumes are illustrated in the TCS (Exhibit 10).

Short-Term Future Improvement Projects

The County's short-term improvements (2023–2027 Capital Improvement Program [CIP]) include the following projects:

- El Rio Sidewalk Improvements: Construction of sidewalks and intersection improvements on various roads within the El Rio area. This project is associated with the RDV Safe Routes to School (SRTS) program.
- Rose Avenue Bike Lanes (Collins-Simon): Construction of Class II bike lanes on Rose Avenue from Collins Street to Simon Way. This will include pavement overlay and bike lane striping improvements on Rose Avenue from south of Collins Street to North of Simon Way, installation of speed feedback signs and other signing additions.

Cumulative Plus Project Roadway and Intersection Operations

The cumulative plus project traffic volumes are illustrated in the TCS (Exhibit 11). Intersection levels of service were recalculated assuming cumulative and cumulative plus project conditions. Table 3-32 and Table 3-33 summarize the cumulative plus project level of service calculations.

Table 3-32. Cumulative + Project Roadway Levels of Service

Roadway Segment	Classification	Cumulative ADT	Cumulative + Project ADT	LOS C Threshold	Existing LOS
Rose Ave n/o Simon Way	Class I	13,200 ADT	13,263 ADT	38,000 ADT	LOS A
Rose Ave n/o Walnut Dr	Class I	15,900 ADT	15,987 ADT	38,000 ADT	LOS A

Table 3-33. Cumulative + Project a.m. and p.m. Peak Hour Intersection Levels of Service

Intersection	a.m. Peak Hour V/C - LOS		p.m. Peak Hour V/C - LOS	
	Cumulative	Cumulative + Project	Cumulative	Cumulative + Project
1. Rose Ave/Central Ave	0.65/LOS B	0.65/LOS B	0.55/LOS A	0.55/LOS A
2. Rose Ave/Simon Wy	0.38/LOS A	0.39/LOS A	0.33/LOS A	0.33/LOS A
3. Rose Ave/Walnut Dr	0.44/LOS A	0.44/LOS A	0.29/LOS A	0.29/LOS A
4. Rose Ave/Orange Dr ¹	20.2 sec/LOS C	27.2 sec/LOS D	12.2 sec/LOS B	13.2 sec/LOS B
5. Rose Ave/Collins St	0.45/LOS A	0.45/LOS A	0.40/LOS A	0.40/LOS A
6. Rose Ave/Stroube St ¹	19.7 sec/LOS C	21.1 sec/LOS C	13.9 sec/LOS B	14.0 sec/LOS B
7. Rose Ave/Ventura Blvd-Auto Center Dr	0.52/LOS A	0.53/LOS A	0.64/LOS B	0.64/LOS B
8. Auto Center Dr/Collins St ¹	13.9 sec/LOS B	15.1 sec/LOS C	28.5 sec/LOS D	31.8 sec/LOS D
9. Santa Clara Ave/Ventura Blvd	0.32/LOS A	0.33/LOS A	0.34/LOS A	0.34/LOS A

Notes: ¹ Unsignalized intersection: level of service based on seconds of delay on minor street.

Tables 3-32 and 3-33 indicate that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range under cumulative and cumulative plus project conditions. The intersections located in the County are forecast to operate in LOS A-B range, except the Rose Avenue/Orange Drive intersection, which would operate at LOS D in the a.m. peak hour. LOS D is acceptable along throughfares. The intersections located in the City of Oxnard are forecast to operate in the LOS A-C range, except the Auto Center Drive/Collins Street intersection, which would operate at LOS D.

Project Site Access and Circulation

As illustrated in Exhibit 2, access to the school student drop-off/pick-up loop on Rose Avenue will be provided via the existing ingress only driveway on Rose Avenue opposite Orange Drive and the existing egress only driveway on Rose Avenue opposite Walnut Drive. A new right-turn only driveway located south of Orange Drive will provide access to Parking Lot A. Two driveways located on Rose Avenue north of Walnut Drive will provide access to Parking Lot B. Two new driveways are proposed on Collins Drive. The driveways provide access to Parking Lot A, the school bus drop-off/pick-up lane and the DTPF.

Field review of school traffic during the morning commute period indicated that the existing drop-off loop system with ingress from the Rose Ave/Orange Dr intersection backs up during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area.

The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Avenue/Collins Street intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF.

It is recommended that RSD develop a school traffic management plan (TMP) to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps).

A continuous sidewalk is provided along the east side of Rose Avenue from Auto Center Drive to the middle school that connects to the school's internal pedestrian facilities. Crosswalks are provided at the signalized intersections at Collins Street and Walnut Drive. As discussed, the County's 2023–2027 CIP includes several projects in the El Rio neighborhood that will improve pedestrian and bicycle access to the middle school. The Rio Del Valle SRTS assessment identified locations for construction of (infill) sidewalks, intersection curb extensions and traffic calming measures along students walking corridors to promote walking to school. A new sidewalk will be constructed along the project frontage on Collins Street that connects to an ADA pedestrian sidewalk system on the project Site.

The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. The project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. The SRTS improvement exhibit and Rose Avenue Bike Lanes project exhibits are included in Appendix 3 of the TCS.

Bicycle Access. The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. This project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. Consideration should be given to install buffered bicycle lanes where feasible to provide increased separation between vehicle and bicycle lanes. Traffic signal improvements at the Rose Avenue/Walnut Drive intersection should include timing verification to accommodate bicycle movements. Improvements on Collins Street may include provision of Class II bike lanes or installation of sharrows and shared road signage.

The on-Site bicycle circulation system should connect to the bicycle lanes on Rose Avenue and Collins Street. The on-Site bicycle route should be clearly designated via striping and signage on the project driveways, and bicycle parking areas should be easily accessible and located in proximity of middle school buildings.

Pedestrian Access. A continuous sidewalk is provided along the east side of Rose Avenue from Auto Center Drive to the middle school that connects to the school's internal pedestrian facilities. Crosswalks are provided at the signalized intersections of Rose Avenue at Collins Street and Walnut Drive. As discussed, the County's 2023-2027 CIP includes several projects in the El Rio neighborhood that will improve pedestrian and bicycle access to the middle school. The Rio Del Valle SRTS assessment identified locations for construction of (infill) sidewalks, intersection curb extensions and traffic calming measures along students walking corridors to promote walking to school. A new sidewalk will be constructed along the north side of Collins Street that connects to an ADA pedestrian sidewalk system on the Site.

Pedestrian connections will be provided between the frontage sidewalks and the middle school's internal sidewalk and walkway circulation system. Pedestrian connections should be provided at or nearby each middle school driveway on Rose Avenue and Collins Street to ensure a clear and direct pathway into the Site.

School Bus Transportation

The proposed project includes the relocation of the DTPF from E. Vineyard Avenue to N. Rose Avenue. While the relocation would not add traffic to the regional roadway network, it would divert bus and employee trips to the immediate vicinity of the Site and its driveways. The DTPF operational statistics provided by RSD are as follows:

- 17 school buses in service. All buses will be parked at the facility.
- Bus traffic consists of 13 a.m. bus routes, four midday bus routes, and 13 p.m. bus routes, for a total 30 buses per school day.
- Total of 10 office/maintenance employees, work times 6:30 a.m. to 3:30 p.m.

The existing middle school is served by six school buses which currently enter the Site and leave to the former facility on E. Vineyard Avenue after dropping off students. In the future, these six buses will leave the Site to start student pick-up routes and remain on the Site after returning to drop off students.

Field review of school traffic during the morning commute period indicated that the existing drop-off loop system with ingress from the Rose Avenue/Orange Drive intersection backs up during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area.

The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Avenue/Collins Street intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF.

Buses will travel via designated routes with frequent stops within the school boundary area at the on-Site bus drop-off and pick-up area. Buses will arrive prior to start of bell schedule (i.e., 8:21 a.m.) and depart after end of regular bell schedule (i.e., 2:53 p.m.). The design of the school circulation system will incorporate school bus turning requirements (swept paths) along the on-Site bus route.

Parking

Figure 2-3 indicates that the proposed parking supply consists of 339 standard spaces, 16 accessible spaces, and 24 bus spaces for a total of 379 spaces. Parking Lot A will contain 214 standard spaces and 10 accessible spaces for a total of 224 spaces. Parking Lot B contains 91 standard spaces and 4 accessible spaces for a total of 95 spaces. The DTPF contains 34 standard spaces, 2 accessible spaces, and 24 bus spaces for a total of 60 spaces. The County of Ventura parking requirement (Municipal Code Division 8, Article 6) for schools (Elementary, Junior High, Middle) is 1 space per 8 students of planned capacity. With a planned capacity of 1,069 students (819 current students plus 250 potential student increase), the parking requirements would be 134 parking spaces.

Incorporation of Mitigation Measures TRAF-1, TRAF-2, and TRAF-3 would reduce all potentially significant impacts related to transportation to a less than significant level.

Rose Avenue/Walnut Drive Intersection

The intersection is controlled by a traffic signal with permissive phasing (green ball) on all approaches, and detection (loops) on the east and west approaches. The northbound approach on Rose Avenue contains a separate left-turn lane and two through lanes, the southbound approach contains a through lane and a shared through/right-turn lane, the eastbound approach (Walnut Drive) has one shared left/right-turn lane, and the westbound approach is the middle school exit driveway with one shared left-turn/through/right-turn lane. School crosswalks are provided on the west and north side of the intersection (ladder crosswalks) and on the east side (basic stripe). Advanced school speed limit signage with speed feedback sign and overhead flashing beacons are provided on Rose Avenue in both directions.

Review of the intersection recent five-year collision history (2017–2021) shows a total of nine collisions with several correctable accidents: three broadsides, three rear-ends, and an improper turn. One pedestrian ROW violation was reported in 2021 (eastbound right-turn vs. southbound pedestrian in crosswalk).

The County's Local Roadway Safety Plan provides several general countermeasures focused on making the path of travel clearer, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). As discussed previously,

the Rose Avenue Bike Lanes (Collins-Simon) project will install Class II bike lanes on Rose Avenue, which would improve bicycle traffic conditions.

Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement, which will require a longer mast arm, and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times. This may require modifications to the northeast corner (ADA improvements, installation of pedestrian push button post).

Improvement Measures

The project-specific analysis found that the project may contribute to the delays experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. The low side street volumes (76 peak hour trips in the p.m. peak hour) and delays would not satisfy any traffic signal warrants. The southbound approach is controlled by a stop sign and contains a shared left-right-turn lane. Prohibiting parking along the west curb extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole; however, the southbound approach would continue to operate at LOS D. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. Table 3-34 shows the mitigated intersection levels of service.

It is recommended that RSD develop a school TMP to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents, and staff (education, traffic control, physical measures such as speed bumps).

Several general countermeasures have been identified by the County for the Rose Avenue/Walnut Drive intersections, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times, including ADA improvements and installation of pedestrian push button post) on the northeast corner.

The cumulative analysis indicated that the Rose Avenue/Orange Drive intersection would operate at LOS D in the a.m. peak hour, which is acceptable along throughfares. The Auto Center Drive/Collins Street intersection would operate at LOS D without and with project traffic. Similarly existing plus project conditions, the southbound approach would continue to operate at LOS D after the restripe to separate turning lanes. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. The intersection would not satisfy traffic signal warrants under cumulative plus project conditions. Table 3-34 shows the mitigated intersection levels of service.

Table 3-34. Auto Center Dr/Collins St Intersection
Mitigated a.m. and p.m. Peak Hour Levels of Service

Scenario	a.m. Peak Hour		p.m. Peak Hour	
	Delay - LOS	Mitigated V/C - LOS	Delay - LOS	Mitigated V/C - LOS
Existing + Project Conditions	14.9 sec/LOS B	14.7 sec/LOS B	31.6 sec/LOS D	29.3 sec/LOS D
Cumulative + Project Conditions	15.1 sec/LOS C	14.9 sec/LOS B	31.8 sec/LOS D	29.4 sec/LOS D

Notes: Unsignalized intersection: level of service based on seconds of delay on minor street.

Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**Vehicle Miles Traveled (VMT)**

State SB 743 (2013), which was codified in Public Resources Code section 21099, required changes to the guidelines implementing CEQA (CEQA Guidelines) (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (*Id.*, subd. (b)(1); see generally, adopted CEQA Guidelines, §15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency (Agency) has certified and adopted, changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project’s transportation impacts.

A project would have a significant effect on the environment if it would cause substantial additional VMT. The OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018) recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets screening criteria, then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required.

Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT. For that reason, OPR recommends quantified thresholds for these land uses for purposes of analysis and mitigation. Lead agencies, using more location-specific information, may develop their own more specific thresholds, which may include other land use types. In general, the recommended “Threshold of Significance” is if a proposed project exceeds a level of 15% below existing regional VMT for that type of project, a significant transportation impact may be generated. However, for other uses (i.e., retail projects), a net increase in total VMT may indicate a significant transportation impact.

VMT Analysis

A VMT analysis was prepared by Stantec for the proposed project (Stantec 2022a). The VMT analysis is included in Appendix I of this EIR. The school portion of the proposed project is the dominant use and meets the locally serving screening criteria; therefore, the proposed project is presumed to have a less than significant impact at the project level. Furthermore, the DTPF portion of the proposed project would also be less than significant on a stand-alone basis based on both the small project screening criteria and the locally serving screening criteria. Since the proposed project would have a less than significant impact at the project level, the proposed project would have a less than significant impact at the cumulative level per OPR’s Technical Advisory. The proposed project was also determined to be consistent with regional plans and to not impact active transportation or transit use.

Induced Automobile Travel Analysis

A project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network. OPR’s proposed transportation impact guidelines includes a list of transportation project types that would not likely lead to a substantial or measurable increase in VMT. If a project fits within the general types of projects (including combinations of types), then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required.

The proposed project is not a transportation project. While the project would improve or reconstruct existing facilities, no new capacity or network changes are anticipated, and impacts would be less than significant.

Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project would be designed and constructed to meet required standards. Sight distance at the project accesses would comply with standard Caltrans and City of Oxnard sight distance standards. The final grading, landscaping, and street improvement plans would demonstrate that sight distance standards are met. Such plans would be reviewed by the City and approved as consistent with this measure prior to issuance of the grading permits. No slope or object over 30 inches would be in the line of sight area. Per the TCS (Appendix I), there would be no increase in hazards due to a design feature or incompatible uses. Therefore, with compliance with existing regulations, project impact would be less than significant, and no mitigation is required.

Would the project result in inadequate emergency access?

The proposed project would not restrict or reduce emergency access to the project Site. The proposed project would be designed and constructed to meet required standards including adequate emergency access. All driveways would be designed according to City standards to facilitate emergency vehicle access. As part of standard development procedures, Site plans would be submitted to the City for review and approval to ensure adequate emergency access prior to construction. Therefore, with compliance with existing requirements, project impact would be less than significant, and no mitigation is required.

3.16.2.4 Cumulative

The cumulative (existing plus approved and pending projects) conditions serves as a near future baseline to assess potential impacts generated by the proposed project. Cumulative traffic volumes were developed based on approved and pending projects information provided by City of Oxnard and County of Ventura staff.

A list of approved and pending development projects in the City of Oxnard was provided by City staff (City of Oxnard 2022a). The location map and *Development Project List* information for the approved and pending projects is included in Appendix 4 of the TCS. The County's RMA staff provided a parcel map with approved and pending projects within a five-mile radius of the project Site. The parcel map information was compared with the project information contained in the County's Approved Projects list and the Pending Project list (County of Ventura 2022b).

Trip generation estimates for the approved and pending projects were developed based on rates contained in the ITE Trip Generation Manual and trips were distributed based on the location of each project, project distribution data contained in traffic studies completed for several approved and pending projects, and existing traffic patterns in the study area. The cumulative-added volumes are illustrated in Exhibit B in Appendix 2 of the TCS and the cumulative (existing plus approved and pending) traffic volumes are illustrated in the TCS (Exhibit 10).

Intersection LOS were recalculated assuming cumulative and cumulative plus project traffic conditions. The LOS calculations indicate that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range under cumulative and cumulative plus project conditions. The intersections located in the County are forecast to operate in LOS A-B range, except the Rose Avenue/Orange Drive intersection, which would operate at LOS D in the a.m. peak hour. LOS D is acceptable along throughfares. The intersections located in the City of Oxnard are forecast to operate in the LOS A-C range, except the Auto Center Drive/Collins Street intersection, which would operate at LOS D. Mitigation Measure TRAF-3 has been added to reduce potentially significant cumulative traffic impacts to a less than significant level.

The City of Oxnard Public Works Division collects traffic impact fees based on project generated traffic that would impact roadways within the City's jurisdiction. Standard conditions of permit issuance initiate collection of these fees for all projects within the City of Oxnard, regardless of whether the project is a private or a public project.

3.16.2.5 Mitigation Measures

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

- TRAF-1: School Traffic Management Plan (TMP).** RSD develop a school TMP to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps).
- TRAF-2: Rose Avenue/Walnut Drive Intersection.** The County's Local Roadway Safety Plan provides several general countermeasures focused on making the path of travel clearer, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement, which will require a longer mast arm, and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times. This may require modifications to the northeast corner (ADA improvements, installation of pedestrian push button post).
- TRAF-3: Auto Center Drive/Collins Street Intersection (Project-Specific and Cumulative).** The project-specific analysis found that the proposed project would contribute to the delays experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. The low side street volumes (76 peak hour trips in the p.m. peak hour) and delays would not satisfy any traffic signal warrants. The southbound approach is controlled by a stop sign and contains a shared left-right turn lane. Prohibiting parking along the west curb extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole, however the southbound approach would continue to operate at LOS D. Similarly existing plus project conditions, the southbound approach would continue to operate at LOS D after the restripe to separate turning lanes. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. The intersection would not satisfy traffic signal warrants under cumulative plus project conditions.

3.16.2.6 Level of Impact After Mitigation

Based on implementation of, and compliance with Mitigation Measures TRAF-1, TRAF-2, and TRAF-3, the potentially significant impacts during the construction of the proposed project related to transportation would be reduced to less than significant.

3.17 TRIBAL AND CULTURAL RESOURCES

This section describes existing tribal cultural resources within the project Site and provides an assessment of potential impacts to tribal cultural resources from implementation of the proposed project. This section discusses tribal cultural resources within the proposed project and surrounding area, evaluates potential project-related impacts on those resources, and provides mitigation measures, as applicable. Tribal cultural resources are defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe.

3.17.1 Environmental Setting

3.17.1.1 Existing Conditions

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

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

3.17.1.2 Regulatory Setting

As specified in the PRC Section 21080.31, as amended by AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. SB 18 establishes the responsibility of a city or county local governments to provide notice and consult with tribes (list maintained by the NAHC) prior to the adoption of or any amendment of a general plan or specific plan and provide an opportunity for the tribe to comment. The bill recognizes that the protection of tribal cultural places is important. Also see Section 3.5.1, discussion regarding AB 52 and SB 18.

Under PRC Section 21074, (a) tribal cultural resources are:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:
 - (A) Included or determined to be eligible for the inclusion in the CRHR, or;

- (B) Included in a local register of historical resources as defined by subdivision (k) of Section 5020.1 (designated or recognized historically significant by a local government pursuant to local ordinances or resolution).
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
 3. A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
 4. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

3.17.2 Impact Analysis

3.17.2.1 Methodology

As discussed in Section 3.5, a cultural resource study was conducted for the project (Tetra Tech 2022a). As part of that study, the SCCIC records search, NAHC SLF, and Phase I archaeological survey did not identify any archaeological or tribal cultural resources within the project Site or within 0.5 mile of the project Site. As specified and in accordance with AB 52 and SB 18, the RSD provided written notification on September 2, 2022 to the following six tribes:

- Barbareño/Ventureño Band of Mission Indians;
- Chumash Council of Bakersfield;
- Coastal Band of the Chumash Nation;
- Northern Chumash Tribal Council;
- San Luis Obispo County Chumash Council; and
- Santa Ynez Band of Chumash Indians.

3.17.2.2 Significance Thresholds

The thresholds for tribal cultural resources impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project cause a substantial adverse change in the significance of a 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:*
 - iv) *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*
 - v) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

3.17.2.3 Project Impacts

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:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k):*

Based on the cultural resource study for the proposed project that included a SCCIC record search, NAHC SLF search, and Phase I archaeological survey (Tetra Tech 2022a, see Section 3.5), no CRHR historical resources or local historical resources listed or eligible for listing were identified within the project Site.

As specified in AB 52/SB 18, notification letters were provided to the six tribes listed above in Section 3.17.2.1.

RSD received a letter dated September 13, 2022 from the Santa Ynez Band of Chumash Indians requesting no further consultation on this proposed project. Consultation is still pending with the other five Chumash tribes.

- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

As discussed previously, the RSD submitted project notification letters to 11 Native American tribal individuals and representatives identified by AB 52 and SB 18 NAHC tribal contact list. RSD received a letter dated September 13, 2022 from the Santa Ynez Band of Chumash Indians requesting no further consultation on this proposed project. Consultation is still pending with the other five Chumash tribes.

3.17.2.4 Cumulative Impacts

Based on the cultural resource study (Tetra Tech 2022a) and tribal consultation, no tribal cultural resources have been identified within the project Site or within the immediate vicinity. As referenced in Section 3.5.2, the project Site is within the coastal and Oxnard Plain region that has been inhabited by the Chumash who lived, traded, traveled, and exploited various coastal and inland resources for subsistence and utilitarian resources. For the analysis, the geographic scope for cumulative cultural resources impacts is considered the City of Oxnard within the Oxnard Plain.

Development of the proposed project, in combination with other cumulative projects in the area, has the potential to contribute to a cumulatively significant tribal cultural resources impact due to the potential loss of such resources unique to the region. However, the CEQA review process and AB 52 and SB 18 consultation with Native American tribes to identify tribal cultural resources would be required for future projects that have the potential to cause significant impacts to tribal cultural resources. In addition, mitigation measures are included in this EIR to reduce potentially significant impacts to unknown tribal cultural resources that could be encountered during construction of the proposed project. Implementation of Mitigation Measures CUL 2 and 3 and existing state laws regarding human remains would reduce the proposed project's incremental potential impacts to tribal cultural resources to a less-than-significant level and ensure that proposed project impacts to tribal cultural resources are not cumulatively considerable.

With implementation of these two mitigation measures and existing state laws, as described above, the proposed project would not result in significant impacts to tribal cultural resources. Given this minimal impact, as well as similar mitigation requirements for other projects in the City of Oxnard, the proposed project's incremental effect is not cumulatively considerable when viewed in connection with the effects of other closely related past projects, the

effects of other current projects and the effects of probable future projects and thus cumulative impacts to tribal cultural resources would be less than significant.

3.17.2.5 Mitigation Measures

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

See Section 3.5.2.5, CUL-2 (Cultural Worker Awareness Training) and CUL-3 (Inadvertent Discovery Plan).

3.17.2.6 Level of Impact After Mitigation

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

3.18 UTILITIES AND SERVICE SYSTEMS

This section describes the proposed project's potential to affect the City of Oxnard utility and service systems, including water supply and associated conveyance infrastructure, wastewater conveyance and treatment infrastructure, storm drain infrastructure, electric power facilities, natural gas facilities, telecommunications facilities, and solid waste disposal systems. This section is partially based on the following Jensen letter reports prepared in 2022: *Sewer Preliminary Investigation (Rio Del Valle School Campus Expansion)* (Jensen 2022c), *Technical Memorandum: Proposed Rio Del Valle School Expansion Domestic Water Demand and Allocations* (Jensen 2022b). The Jensen letter reports are provided in Appendix H.

3.18.1 Environmental Setting

3.18.1.1 Existing Conditions

Water Supply

Historically, the domestic water supply for RSD facilities has been provided by a combination of three active ground water wells and domestic water connections with the City of Oxnard and UWCD. The three wells are located at Rio Real School, RDV Middle School, and the former El Rio Elementary School, located west of Rose Avenue from the existing RDV school, which was closed in 2007. Water allocations for these three wells have been set at a total of 52.074 AFY since the FCGMA adopted Ordinance E, which limits extractions from groundwater extraction facilities, in 1983.

The El Rio Elementary School site has been sold by the RSD. A mixed-use development on the former school site has been approved by the Oxnard City Council. As such, the 40.399 AFY of groundwater pumping allocation for the on-Site well is in the process of being transferred to the new owner. Following this transfer, the RSD will have 11.675 AFY of water allocations remaining for the two wells located at Rio Real School and RDV Middle School.

54.6 AFY of FCGMA water allocations are to be transferred to RSD with the newly acquired land to the north (northern campus expansion area) and south of the existing RDV Middle School campus (southern campus expansion area). The water transfer amount has yet to be finalized in a formal written agreement with the sellers of both parcels. With this transfer, the RSD will have a total of 66.275 AFY of FCGMA water allocations.

Supply Sources

Four sources supply water to the existing RDV Middle school: the on-Site well (subject to FCGMA requirements), the UWCD, the Rio Real school well, and the City of Oxnard. The City of Oxnard supplies water for the gymnasium, UWCD supplies water for the existing main campus buildings, and the on-Site RDV well and the Rio Real school well supply irrigation water for landscaping and watering of play fields.

Under the FCGMA "Ordinance to Establish a New Pumping Allocation System for the Oxnard and Pleasant Valley Basins," effective October 1, 2020, initial extraction allocations were set based on the average annual extractions per well during the 2005 through 2014 base period. Table 3-35 summarizes the historical well extractions for RSD.

Table 3-35. RSD Average Annual Well Extractions (2005 – 2014)

School	Average Annual Well Extraction
RDV Middle School	27.33 AFY
Rio Real School	14.26 AFY
Total:	41.59 AFY

Three sources of water are used by the City: local groundwater supplied by City-owned groundwater wells (regulated by FCGMA), groundwater imported under contract with the UWCD, and water imported from Calleguas Municipal Water District (CMWD). For the most part, City customers receive a blend of these supplies, of which the proportion changes based on the supplies available to the City (City of Oxnard 2022e). The City of Oxnard also produces recycled water at its AWPf, which is intended for use in the landscape irrigation of parks, schools, golf courses, and common areas. The AWPf treats wastewater utilizing microfiltration, reverse osmosis, and an advanced oxidation process to create water suitable for irrigation. Table 3-36 summarizes the water supplies for the City of Oxnard in the year 2020 (WSC 2021).

Table 3-36. Summary of Existing and Projected Water Supplies (acre-feet)¹

Water Supply	2015 ²	2020	2025	2030	2035	2040
City Groundwater ³	6,275	14,186	21,186	21,186	21,186	21,186
UWCD	7,344	7,329	7,329	7,329	7,329	7,329
CMWD	12,187	11,826	11,826	11,826	11,826	11,826
Recycled Water	605	7,000	14,000	14,000	14,000	14,000
TOTAL	26,411	40,341	54,341	54,341	54,341	54,341

Source: WSC 2021

The following summarizes the City's various sources of supply and discusses associated environmental or reliability issues.

1. **Groundwater Supply.** The City extracts groundwater from the Oxnard Basin throughout normal and dry years, with a total groundwater allocation of approximately 17,000 AFY from all sources (WSC 2021). In the last five years, the City has extracted an average of 7,250 AFY from the Oxnard subbasin; however, the City is required to reduce groundwater extractions over the planning period. To achieve sustainability and prevent net seawater intrusion after 2040, FCGMA has imposed allocation cutbacks for the City and other basin users to meet sustainability goals (FCGMA 2019b). As a result, the City is required to reduce groundwater extractions by 45% by 2040, or 2.2% per year. The available groundwater supply is also susceptible to water quality issues. Currently, the City operates a desalter and blends the local groundwater with imported water to keep TDS levels as low as possible.

As mentioned, the City's total allocation for the Oxnard Basin is approximately 17,000 AFY, including the City's extractions averaging about 7,250 AFY. The remaining 9,750 AFY is extracted by UWCD on behalf of the City and delivered through the Oxnard-Hueneme (O-H) pipeline. In 2020, the combined actual City extraction including UWCD was 17,818 AF, as shown in Table 3-33 (WSC 2021). This agreement helps the City and other coastal agencies protect against seawater intrusion. Rather than pump near the coast, the City obtains water from the O-H pipeline that conveys groundwater extracted from wells further inland. The O-H Pipeline Agreement between UWCD in the Draft Calleguas Imported Water Outage Protocol (IWOP) Memo (California Data Collaborative for Calleguas Municipal Water District, February 2021). The City has imported an average of 10,400 AFY from CMWD in the last five years.

Fox Canyon Groundwater Management Agency 2020 Groundwater Sustainability Plan (GSP)

The GSP describes many existing surface water and groundwater monitoring programs in the Subbasin administered by other agencies such as the USGS, Ventura County Watershed Protection District, UWCD, and CMWD. Groundwater quality in the Subbasin is monitored by multiple state and local agencies for various programs. The data provided by these monitoring programs and other investigations conducted in

the Subbasin since the 1930s have been used to understand the groundwater conditions and develop sustainable management criteria for the GSP. FCGMA intends to continue to rely on groundwater elevation data collected by the Ventura County Watershed Protection District to assess the groundwater conditions for GSP annual reports and the five-year GSP evaluations.

The sustainability goal for the Subbasin is to “increase groundwater elevations inland of the Pacific coast, to prevent landward migration of the 2015 saline water impact front, and to prevent net seawater intrusion in the Upper Aquifer System and the Lower Aquifer System.” As stated in the GSP, seawater intrusion is the primary sustainability indicator in the Oxnard Subbasin and sustainable management criteria were established based on information gathered over several decades from the monitoring programs investigations described above and with input from beneficial users of groundwater in the Subbasin. The GSPs of the neighboring Pleasant Valley Basin and Las Posas Basin were also developed by FCGMA, demonstrating a regional approach.

The GSP will use groundwater levels as a proxy to manage all applicable sustainability indicators and establishes sustainable management criteria that aim to either significantly improve groundwater conditions or not worsen them. For instance, minimum thresholds for seawater intrusion aim to limit net landward migration of the 2015 saline water impact front beyond the already impacted area while the measurable objectives aim to halt seawater flow into and freshwater flow out of the Upper Aquifer System or the Lower Aquifer System. Similarly, the expansion of areas impacted by degraded water quality that limit beneficial uses of groundwater is defined as an undesirable result. To manage depletions of interconnected surface water, the GSP establishes management criteria for the Oxnard aquifer which underlies and, as the Groundwater Sustainability Agencies (GSAs) claim, supports groundwater elevations in the shallowest aquifer. The shallowest aquifer, locally referred to as the semi-perched aquifer, supports groundwater dependent ecosystems (GDEs) but is not considered a principal aquifer due to low groundwater production in the basin. The GSP proposes to continue monitoring the semi-perched aquifer to evaluate the depletion of interconnected surface water. The GSP recognizes significant and unreasonable lowering of groundwater levels and reduction of groundwater storage has occurred historically or is currently occurring in the Subbasin and defines the groundwater condition related to significant and unreasonable seawater intrusion.

To meet the sustainability goal of the Subbasin, the GSP proposes to implement a series of projects and management actions. Four proposed projects are related to the expansion of current water supply and groundwater recharge, and one project relates to temporary agricultural land fallowing. The GSP identifies two management areas that are vulnerable to seawater intrusion and chronic decline of groundwater levels. Management actions proposed to protect these vulnerable areas include reducing groundwater production and limiting the transfer of pumping allocations; FCGMA has the legislative authority to restrict groundwater production and conducted a pilot program for limiting transfer pumping allocations in 2019. The GSP acknowledges that the current revenue generated from pumpers of the Subbasin through extraction and sustainability fees would not be enough to fund the projects and management actions and, therefore, the Agency intends to increase the sustainability fee and impose a replenishment fee (DWR 2021).

2. **Wastewater and Recycled Water.** The City of Oxnard provides wastewater collection and treatment services through the Public Works Wastewater Division. The OWTP, located in southwest Oxnard, serves the cities of Oxnard and Port Hueneme, Naval Base Ventura County and Point Mugu, and some adjacent unincorporated areas. The City owns, operates, and maintains over 400 miles of sewer pipeline and 15 wastewater lift stations. Three additional pumping stations owned and operated by other entities also discharge to the City's system (City of Oxnard 2017). Additionally, the City of Oxnard implements the GREAT Program, which includes the use of an AWPf. Currently, the City serves recycled water to local farmers for irrigation through the use of the AWPf. The City plans to maximize recycled water as a groundwater recharge supply source to ensure future reliability and affordable supply of high-quality water through the GREAT Program (Carollo for the City of Oxnard 2017). The GREAT program aims to increase

reliability of water supply, reduce costs of water supply (imported sources), improve the dependability in accommodating existing needs and meeting planned growth and demands, and enhanced stewardship of the local water supply through recycling and reusing a substantial portion of the region's wastewater. The AWPf currently treats 6.25 million gallons per day (MGD) of wastewater from the OWTP for non-potable (irrigation and industrial) uses and groundwater injection (Dudek for the City of Oxnard 2019).

The City has outlined future projects to expand the AWPf and create a reliable recycled water supply for indirect potable reuse (IPR). The use of AWPf water as a potable water supply must be demonstrated to water regulatory authorities (California Division of Drinking Water and Los Angeles RWQCB) before adding it as a potable source. It is anticipated that the AWPf will provide up to 11,900 AFY of recycled water for IPR. IPR is anticipated to be a drinking water source starting in 2024. Six aquifer storage recovery (ASR) wells are planned for construction and expected to be operational by 2026 (WSC 2021). On May 13, 2022, the U.S. EPA announced a \$48 million WIFIA loan to the City to support the project.

- 3. Imported Surface Water Supply.** Diverted surface water from the Santa Clara River and Conejo Creek is used for managed aquifer recharge in spreading basins and for non-potable applications.

Wastewater Systems

The City of Oxnard provides existing wastewater service to RDV through an extension of the sewer main in Rose Avenue to the existing RDV Site. The 11.1-acre southern campus expansion area is currently served by a septic system and does not contribute to the wastewater system. Sewer service is proposed to be provided to the southern campus expansion area via a new connection to the City of Oxnard sewer main, separate from the existing main campus sewer. The nearest City line is an 8-inch line in Collins Street, adjacent to the southerly boundary of the site. The line runs east in Collins Street and south in Via Estrada before discharging to a 15-inch trunk line in Auto Center Drive at a manhole in the intersection (Jensen 2022c).

Sewer service for new improvements on the existing main campus will be via connecting to the existing RDV sewer Point of Connection (assuming adequate capacity). The 10-acre northern campus expansion area is not presently on septic system or municipal sewer. Since the northern campus expansion area will remain in agriculture there will be no proposed action with respect to wastewater services.

Stormwater Systems

The project Site is located within the Santa Clara River floodplain. Ventura's Countywide Stormwater Quality Management System contains a Countywide Unified Storm Drain Mapping System. According to the online storm drain system, no dedicated storm drains are located along the perimeter of the existing or proposed middle school expansion footprint.

The City is divided into 18 major drainage watersheds, which are defined mainly by topography and major drainage facilities. According to the City of Oxnard's PWIMP Stormwater section (Carollo 2017), the project Site is in the Nyeland Acres Major Drainage watershed. The Nyeland Acres watershed is 975 acres and has an area of 1.52 square miles (Carollo 2017). According to the FEMA floodzones map the NA watershed, and the project Site, are located in an "Area of Minimal Flooding" (Carollo 2017).

The project area does not contain any streams, wetlands, or other waters under jurisdiction of the USACE, RWQCB, or the CDFW.

Jensen's *Preliminary Drainage Report* (Jensen 2022a) states that site drains to the southeast via surface flow and discharges to a City of Oxnard reinforced concrete box in Auto Center Drive, approximately 0.25 mile from the project Site. It appears from the County of Ventura's GIS (County of Ventura 2022c), runoff on Auto Center Drive appears to flow east and discharge to an open ditch known as Nyeland Drain (traveling north and then east) around agricultural land and the community of Nyeland Acres, then south into Beardsley Channel (Wash) over two miles downstream, which becomes Revlon Slough. Thus, the proposed project would ultimately discharge to Revlon

Slough/Calleguas Creek Watershed. The primary water sources for Beardsley Channel and Revlon Slough are agricultural and storm water (County of Ventura 2014).

The City of Oxnard's storm water drainage features are maintained by the City of Oxnard Public Works Department Operations Division and VCWPD, and consist of gutters, catch basins, manholes, underground pipes, roadside ditches, and channels, all of which drain directly to the Pacific Ocean. Major drainage channels within Oxnard include Doris Avenue Drain, Wooley Road Drain, Fifth Street Drain, Oxnard West Drain, Oxnard Industrial Drain, "J" Street Drain, Rice Road Drain, El Rio Drain, Camarillo Drain, and Nyeland Drain (Carollo 2017).

Electric Power

SCE currently provides electrical service to RDV. SCE will provide electrical service to the proposed expansion area via new electrical secondary connection(s) and meter(s). SCE has existing 17 KV overhead primary power lines located in the Rose Avenue ROW, on the eastern side of Rose Avenue along the western Site boundary. Electrical power is supplied to the southern campus expansion area from the overhead primary power lines located in the Rose Avenue ROW by a run of overhead secondary power lines routed approximately 600 feet east from Rose Avenue and approximately 55 feet south of the north boundary of the southern campus expansion area. Electrical power is also routed from this run of overhead secondary power lines to a pole on the southern boundary of the existing middle school campus adjacent to the Gymnasium building. There are two pole-mounted electrical transformers located along the run of overhead secondary power lines in the southern campus expansion area approximately 520 feet and 600 feet east of Rose Avenue. Another pole-mounted electrical transformer is located along the overhead primary power lines located in Rose Avenue immediately adjacent to the western boundary of the southern campus expansion area approximately 280 feet south of the north boundary of the southern campus expansion area. While the southern campus expansion area is currently serviced by SCE with the existing secondary power lines, it is anticipated that service will be further extended from the existing SCE primary infrastructure, which is located on the same side of the street as RDV, to service the southern campus expansion area.

Natural Gas

The Southern California Gas Company (Sempra Energy) is the gas service provider for the City of Oxnard (City of Oxnard 2022f).

Telecommunications

The City of Oxnard has six primary internet providers with four of those offering residential service. Spectrum is the most widely available choice for Oxnard residents and is accessible for 99% of Oxnard. Frontier Communications is also a common option in the area, serving 98% of Oxnard with digital subscriber lines (DSL) service. Satellite internet can be serviced in nearly 100% of Oxnard (BroadbandNow 2022).

Solid Waste Collection and Disposal

Solid waste and recycling collection and disposal is provided by the City of Oxnard through an agreement for solid waste disposal services with Waste Management of California, Inc. (Ventura Regional Sanitation District 2022). Solid waste in Oxnard is either taken to the City-owned and operated Del Norte Regional Recycling and Transfer Station, a material recovery facility (MRF) located at the corner of Sturgis Road and Del Norte Road. Recoverable materials are removed from the waste stream at the MRF for recycling. Typical recycling materials include aluminum, glass, paper, metals, plastics, wood, and yard waste. The permitted capacity of the MRF is 2,779 tons per day (tpd) (County of Ventura 2017). Toland Landfill in Santa Paula and Simi Valley Landfill & Recycling Center (SVLRC) in Simi Valley are the two active landfills in Ventura County. Various other green waste processing centers for processing wood and organics are also located throughout the county. Under a recent permit expansion, the Toland Road Landfill can accept as much waste as can be delivered daily in 152 heavy trucks, which brings the capacity to approximately 2,500 tons of garbage per day, with no date set for closure (Ventura Regional Sanitation

District 2022). The SVLRC is permitted to accept up to 3,000 tons per day of refuse and can accept 6,250 tons of recyclable materials (Waste Management 2022).ASCE

3.18.1.2 Regulatory Setting

Federal

Federal Clean Water Act

The federal CWA establishes regulatory requirements for the raw and treated water quality used as potable water supplies. The City of Oxnard is required to monitor water quality and conform to the regulatory requirements of the CWA.

Federal Safe Drinking Water Act (SDWA)

The Federal SDWA establishes standards for contaminants in drinking water supplies. Maximum contaminant levels and treatment techniques are established for each of the contaminants, which include metals, nitrates, asbestos, total dissolved solids, and microbes.

National Flood Insurance Program

The FEMA administers the National Flood Insurance Program (NFIP). In 1985, FEMA completed FIRMs depicting flood zones that have a 1% annual chance of flooding (at that time known as the 100-year flood zone). These maps have since been digitized (Digital Flood Insurance Rate Maps [DFIRMs]) and for this area were issued in 2010. Property owners within Flood Zone A are federally mandated to purchase flood insurance.

Resource Conservation and Recovery Act (RCRA)

EPA regulates household, industrial, and manufacturing solid and hazardous wastes under the RCRA. The RCRA's goals are to protect us from the hazards of waste disposal; conserve energy and natural resources by recycling and recovery; reduce or eliminate waste; and clean up waste that which may have spilled, leaked or been improperly disposed of.

State

California SDWA

California's SDWA was enacted in 1976. The SWRCB, Division of Drinking Water (DDW) has been granted primary enforcement responsibility for the SDWA. Title 22 of the California Administrative Code stipulates drinking water quality and monitoring standards; standards are equal to or more stringent than federal standards.

California Executive Orders and Resolutions

On March 28, 2022, Governor Gavin Newsom issued Executive Order N-7-22 to address the impacts of the drought presently being experienced in California.

Governor Newsom gave the State Water Resources Control Board (State Water Board) much of the responsibility for carrying out Executive Order N-7-22, including the possibility that urban water suppliers may be required to adopt more stringent water conservation strategies.

Governor Newsom directed the State Water Board to consider adopting emergency regulations focused on urban water suppliers. If adopted, the potential regulations would require the vast majority of urban water suppliers to enact Level 2 of their water shortage contingency plans. Those plans are developed by the suppliers and provide actions they will take if their water supplies are cut to certain levels. Level 2 would represent the suppliers acting as if their water supply had been reduced by 20%.

The executive order also directed the State Water Board to consider adopting emergency regulations defining “non-functional turf” by May 25, 2022. As of June 10, 2022, an emergency regulation promulgated by the State Water Board went into effect that bans the irrigation of decorative or non-functional grass with potable water in commercial, industrial, and institutional settings. The regulation does not apply to residential lawns, school fields, sports fields, or areas regularly used for civic or community events (SWRCB 2022).

The executive order also suspends CEQA requirements for the urban water suppliers and non-functional turf actions. In addition, the Order suspends CEQA for “any other projects and activities for the purpose of water conservation to the extent necessary to address the impacts of the drought” and related permits. These actions streamline the process to take such actions.

The executive order also includes limitations on building new wells or altering existing ones, as long as the well at issue provides at least 2 acre-feet per year of groundwater. The general limitation requires findings that extracting the groundwater (1) would not interfere with nearby wells and (2) is not likely “to cause subsidence that would adversely impact or damage nearby infrastructure.”

Lastly, the executive order includes a separate requirement for wells in a medium- or high-priority basin under the SGMA. There, the Groundwater Sustainability Agency must make written findings that the well would not (1) be inconsistent with the applicable Groundwater Sustainability Plan and (2) decrease the likelihood of achieving an applicable sustainability goal. In short, the order stiffens the SGMA requirements for medium- and high-priority basins (State of California 2022).

California Water Code - Urban Water Management Planning Act

Pursuant to the Urban Water Management Planning Act (California Water Code §§ 10610 - 10656) urban water suppliers having more than 3,000 service connections or water use of more than 3,000 AFY for retail or wholesale uses are required to submit an UWMP every five years to the DWR. UWMPs are prepared to support long-term resource planning and to ensure that reliable and adequate water supplies are available to meet existing and future demands over a 20-year planning horizon during normal, single-dry and multiple-dry year periods.

California Water Conservation Act

The Water Conservation Act of 2009 (often referred to as SBX7-7) requires increased emphasis on water demand management and requires the state to achieve a 20% reduction in urban per capita water use by December 31, 2020. Retail urban water suppliers are required to report baseline and compliance data in their UWMPs in accordance with the requirements of SBX7-7. The City of Oxnard adopted its current UWMP in 2020. The City’s final 2020 target water use of 140 gallons per capita per day (GPCD) was calculated as a result of the SBX7-7 Guidelines “minimum water use reduction” requirement. The City did not need to update calculations for the 2020 UWMP, as their service area has remained constant (WSC 2021).

California Public Utilities Code

Public utilities are under the jurisdiction of the California Public Utilities Commission. According to California Public Utilities Code, Section 451, public utilities have an obligation to serve the public and are required by law to “furnish and maintain...service as necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.” As a result, utility providers are required by law to provide service to any member of the public living within the utility’s service area who has applied for service, is willing to pay for the service, and will comply with the applicable rules and regulations.

California Model Floodplain Management Ordinance

The California SWRCB provides and encourages communities to adapt the California Model Floodplain Management Ordinance to deal with the deficiencies identified in the FEMA FIRM flood zone maps.

The California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act (AB 939) made all California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 25% of their solid waste by 1995 and 50% by year 2000. Later legislation mandates the 50% diversion requirement be achieved every year.

CalRecycle oversees and provides assistance to local governments as they develop and implement plans to meet the mandates of the IWMA and subsequent legislation.

CalRecycle has statutory requirements under Public Resources Code (PRC) sections 41813 and 41850(a) to enforce the provisions of AB 939 if a local jurisdiction fails to submit an adequate element or plan or if a local jurisdiction fails to implement its Source Reduction and Recycling Element (SRRE) or Household Hazardous Waste Element (HHWE). Administrative civil penalties of up to \$10,000 per day may be imposed on local jurisdictions until the element or plan is submitted to CalRecycle and is deemed adequate or until the element or plan is implemented. This policy has been prepared to address the process CalRecycle will use to determine adequacy of elements and plans and to discuss enforcement options. CalRecycle has to address jurisdictions who fail to submit an adequate element or plan (CalRecycle 2022a).

Assembly Bill 1826

Assembly Bill 1826 (AB 1826) was enacted April 1, 2016 in an ongoing state effort to divert 75% of solid waste from California landfills. AB 1826 requires businesses, including commercial or public entities such as schools, hospitals, stores, restaurants, industrial businesses, for profit or non-profit organizations, multi-family dwellings with five (5) or more units and others, to recycle their organic waste, based on the amount and type of waste the business produces on a weekly basis, with full implementation realized by 2019.

California Green Building Standards Code (CCR Title 24, Part 11) (CALGreen)

The purpose of CALGreen is to improve public health, safety, and general welfare through enhanced design and construction of buildings using concepts which reduce negative impacts and promote those principles which have a positive environmental impact and encourage sustainable construction practices. CALGreen was adopted to address the five divisions of building construction: Planning and design; energy efficiency, water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen requires covered projects to recycle and/or salvage for reuse a minimum 65% of the nonhazardous construction and demolition waste or meet a local construction and demolition waste management ordinance, whichever is more stringent (CalRecycle 2022b).

Local

City of Oxnard Water Neutrality Policy

On January 15, 2008, the City of Oxnard adopted a policy that ensures mitigation measures are imposed as part of approval of new development, so that the associated demand remains consistent with available supplies (the Water Neutrality Policy). The net result of this policy is that project approvals include conditions that: a) control the pace of construction of any given project (and thus the pace at which water demand increases); b) allow participation in the contribution toward the development of additional water supplies that offsets the demand associated with the project; or c) suspend project approval until sufficient supplies are available to support the anticipated project demand. The Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. New development includes all planned (anticipated in the 2030 General Plan) and any unplanned future development. Under the policy, a development can be water neutral by meeting its projected demand through one or more of the following:

- Transfer of existing FCGMA groundwater allocations to the City;
- Contributing to increased efficiency by funding City water conservation programs;

- Funding recycled water retrofit projects; or
- Providing additional water supplies.

City of Oxnard Municipal Code - Director Order No. 22-03

On March 28, 2022, Executive Order N-7-22 was ordered which directs a number of actions in response to the historic drought conditions the State, and by extension, the City, are facing. Among these actions are steps to increase water conservation, emergency regulations requiring all water providers to implement a minimum Stage 2 of their Water Shortage Contingency Plans (WSCPs) and groundwater recharge programs.

Approximately 40% of the City's water supply is imported from northern California via the SWP as distributed to the City via CMWD, which receives water from the MWD. The DWR initially set the 2022 SWP allocation at 15% of normal. However, after a historically dry start to the year with no significant storms in the forecast, the allocation was reduced from 15% to 5%. Following the 5% SWP allocation update, MWD indicated that SWP dependent regions of its service area, including CMWD, have insufficient supplies to meet current water demands. In response, CMWD declared a Stage 3 Water Shortage on April 6, 2022, and called on all water users within its service area to immediately reduce water by up to 30%.

On May 17, 2022, the Oxnard City Council proclaimed the existence of a local emergency due to drought conditions and lack of water supply and adopted Resolution 15,569 establishing new mandatory water conservation measures. Applicable mandatory water conservation measures for the proposed project are:

Section 4.a. Watering of lawns, ornamental turf, trees, shrubs, vegetation, landscape and other outside irrigation is prohibited except between 4 p.m. and 9 a.m. or 6 p.m. and 9 a.m. during daylight savings time, no more than once per week.

Section 4.b. The following watering schedule is established:

- i. Odd numbered addresses (Ending in 1, 3, 5, 7, 9): Sundays ONLY.*
- ii. Even numbered addresses (Ending in 0, 2, 4, 6, 8): Saturdays ONLY.*
- iii. No watering between 9 a.m. and 4 p.m. (non-Daylight Savings Time)*
- iv. No watering between 9 a.m. and 6 p.m. (Daylight Savings Time)*

Section 4.c. Exceptions to allow for irrigation outside of the designated periods shall include (1) the hand watering of trees or other perennials with use of a container (e.g., bucket or watering can) or a hose fitted with a shut-off nozzle and (2) the use of drip irrigation or other high-efficiency irrigation systems to apply water at a weekly volume consistent with the one-day watering restriction imposed on less efficient irrigation systems.

Section 4.d. Irrigation of park and school ground areas with potable water are only permitted during the once weekly designated irrigation periods noted in this section.

Section 4.e. Sport activity fields may irrigate more frequently, but only as necessary, to maintain playing surface quality. (City of Oxnard 2022b)

FCGMA Groundwater Management

The FCGMA established a series of water management policies and programs that are intended to protect the long-term integrity and reliability of the local groundwater resources within its jurisdiction. Ordinance 8.1. is FCGMA's primary regulatory tool for achieving its goals but has also adopted several resolutions. The FCGMA's primary groundwater preservation program is embodied in its comprehensive ordinance code, requiring the following: a) all groundwater wells to be registered with the agency; b) all groundwater use to be reported to the agency; and c) limits on the amount of groundwater that may be pumped from within the agency's jurisdiction without the payment

of a pumping surcharge. Emergency Ordinance E requires additional pumping restrictions within the FCGMA boundary and currently restricts the use of groundwater conservation credits.

Ventura County Floodplain Management Ordinance

Ventura County adopted their Flood Plain Management Ordinance (Ordinance 3741) in 1985. Several revisions have been made since then with the latest ordinance adopted in 1990 (Ordinance 3954). The VCWPD implements this ordinance to ensure compliance with the NFIP. The ordinance addresses the risks of development within the floodplain and includes a list of prohibited discharges, exemption procedures, and requirements for construction and permitting (Carollo 2017).

County of Ventura Solid Waste Program

Solid Waste staff serve Ventura County residents by ensuring the safe handling and proper disposal of residential and commercial solid waste. Staff inspect, permit, and monitor the operation of solid waste facilities such as landfills, waste transfer processing stations, composting operations, and chipping/grinding operations. Staff also respond to complaints of illegal solid waste disposal and perform related investigations.

RMDZ – Recycling Market Development Zone Program

The County of Ventura, along with its 10 cities, is a State-designated Recycling Market Development Zone (RMDZ). The purpose of the RMDZ is to help create local markets for the processing, manufacturing, and marketing of products made from recycled materials. Businesses are eligible for a variety of state and local incentives and assistance if they use recycled or reused materials to make products, or if they can make their products out of less material than they did previously.

City of Oxnard Municipal Code Sec. 19-150

The City finds and declares the following: The collection, transportation, processing, marketing, transfer and disposal of solid waste and recyclables by qualified persons is necessary to protect the public health, safety and general welfare and to implement State law. For these reasons, collecting, transporting, processing, marketing, transferring and disposing of solid waste and recyclable materials requires regulation and control by the City in the manner set forth in this code, including, but not limited to, this article.

Ventura County Ordinance No. 4590

The Board of Supervisors approved Ordinance 4590 on December 7, 2021. This amended County ordinance code regulates solid waste collection, disposal, and recycling within the unincorporated areas of the County, as required by state ABs 939 and 341. This ordinance includes the regulation of organic waste as required in SB 1383. This ordinance also requires the recycling and diversion of construction and demolition (C&D) debris from residential and commercial projects.

Ventura County Ordinance No. 4156

The Board of Supervisors approved Ordinance 4156 on December 9, 1997. Effective July 1, 2004, the current County Integrated Waste Management Plan (CIWMP) Fee is \$0.05 per ton. This ordinance code provides for the assessment and collection of the CIWMP fee. The CIWMP fee was established to defray the costs associated with the preparation, adoption and implementation of regional integrated waste management plans for both the incorporated and unincorporated areas of Ventura County. The fee is paid by City and County solid waste collectors on all Ventura County solid waste disposed at landfills inside and outside the County. It is also paid by in-county solid waste facilities on waste brought in by self-hauls and disposed waste originating outside the County.

City of Oxnard Ordinance No. 2372

Ordinance 2372 governs the solid waste collection, handling, and processing in the City limits. This ordinance regulates and controls the collecting, transporting, processing, marketing, transferring, and disposing of solid waste and recyclable materials by the City.

City of Oxnard 2030 General Plan

The relevant goals and policies applicable to schools within the City for water supply, stormwater drainage, gas and electric utilities, water resources, and solid waste management, as described in Chapter 4 of the City of Oxnard 2030 General Plan (City of Oxnard 2016) are described as follows.

Chapter 4 Infrastructure and Community Services

- ICS-1.2 Development Impacts to Existing Infrastructure:** Review development proposals for their impacts on infrastructure (e.g., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.
- Goal ICS-11 Water supply, quality, distribution, and storage adequate for existing and future development.**
- ICS-11.1 Regional Water Quality Management Plans:** Support the countywide Water Quality Management Plan, the Sea Water Intrusion Abatement Program, wastewater reclamation, water conservation programs, and regional coordination.
- ICS-11.2 Maintain Water Capital Master Plans:** As needed, continue to update the City's Master Plan of Drainage (2001), Water Master Plan (2003), Urban Water Management Plan (2005), Wastewater Master Plan (2008) and Recycled Water Master Plan, Phase I (2009) to address water-related constraints and opportunities.
- ICS-11.3 GREAT Program Implementation:** Continue to implement the GREAT Program as the key program for the City's short and long-term water supply.
- ICS-11.4 Potable and Recycled Water Distribution Systems:** Continue upgrading the potable and recycled water transmission and distribution systems in a timely manner to meet anticipated demand and to implement the GREAT Program.
- ICS-11.5 Sustainability of Groundwater Supply:** Support the policies of the FCGMA to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.
- ICS-11.6 Water Conservation and/or Recycling Connection as Mitigation:** Require the use of water conservation offset measures (efficient low flow fixtures and irrigation systems, drought tolerant landscaping, leak detection programs, water audits, and public awareness and education programs) and/or proportional contributions to recycled water production and/or conveyance infrastructure related to the GREAT Program as mitigation for water supply shortage as determined by a Water Supply Assessment, CEQA documentation, or similar analysis as part of new or master plan development review.
- ICS-11.7 Water Wise Landscapes:** Promote water conservation in landscaping for public facilities and streetscapes, residential, commercial, and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new and replacement landscaping.

- ICS-11.9** **Groundwater Extractions:** Continue to adhere to the recommendations of the Ventura County Regional Water Quality Planning Program regarding groundwater quality and extractions.
- ICS-11.10** **Water Supply Finding for Smaller Projects:** Prior to approval of a discretionary proposed project not subject to a Water Supply Assessment pursuant to Government Code Section 66473.7, a finding shall be made to ensure an adequate water supply for the proposed development.
- ICS-11.12** **Water for Irrigation:** Require the use of non-potable water supplies for irrigation of landscape and agriculture, whenever available.
- ICS-11.13** **Water Neutral Policy and Urban Water Management Plans:** Incorporate the City's Water Neutral Policy regarding new development into the 2020 Urban Water Management Plan and develop appropriate ordinances, policies, and/or programs to fully implement the policy.
- Goal ICS-12** Adequate capacity at the City Wastewater Treatment Plant to accommodate existing and future development.
- ICS-12.3** **Wastewater Discharge Monitoring:** Monitor and ensure that discharges comply with approved permits.
- ICS-12.5** **Sedimentation Control:** Require by conditions of approval that silt and sediment from construction be either minimized or prohibited.
- ICS-12.6** **Timing of Future Development:** Impose conditions in order to ensure adequate wastewater capacity for proposed new development.
- Goal ICS-13** Adequately sized storm drain systems and discharge treatment, certified levees, and implementation of appropriate NPDES permits and regulations.
- ICS-13.2** **Adequate Storm Drains and NPDES Discharge Treatment:** Provide storm drainage facilities with sufficient capacity to protect the public and property from the appropriate storm event and strive to meet storm water quality discharge targets set by NPDES and related regulations.
- ICS-13.3** **Stormwater Detention Basins:** Design stormwater detention basins to ensure public safety, to be either visually attractive or unobtrusive, provide temporary or permanent wildlife habitats, and recreational uses where feasible in light of safety concerns.
- ICS-13.4** **Low Impact Development:** Incorporate LID alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education.
- Goal ICS-14** Reduced Solid Waste and Increased Recycling
- ICS-14.1** **Waste Reduction:** Continue to implement and participate in appropriate source reduction and recycling programs to meet mandated waste reduction levels as specified within the California Integrated Waste Management Act of 1989, promote the maximum feasible use of solid waste recycling and composting of organic waste, and strive to reduce commercial and industrial waste.
- ICS-14-2** **Use of Recycled Materials:** Use recycled materials and employ recycling techniques for City operations to reduce demand for solid waste disposal capacity, where feasible, and encourage recycling of construction and demolition materials generated at residential and commercial new construction and renovation sites.

- ICS-14-3** **New Development Requirements:** Continue to require developers and operators to employ practices that reduce the quantities of waste generated and promote resource recovery during construction, demolition, and operation.
- Goal ICS-17** Adequate and efficient public utilities that meet the needs of residents of the City.
- ICS-17.1** **Electric Facilities:** Ensure that public and private, replacement and/or refurbished, electric generation and/or transmission facilities are built in accordance with the California Coastal Commission Sea Level Rise Policy Guidance, California Public Utilities Commission and/or California Energy Commission policies and regulations and incorporate feasible solar, wind, and other renewable sources of energy.
- ICS-17.3** **Promoting Renewable Energy Production:** Encourage the use of renewable solar, wind, and other electric generation technologies instead of new or expansion of fossil fuel-based generation facilities.
- ICS-17.4** **Service Extension:** Coordinate with gas and electricity providers for the extension of gas and electrical facilities.
- ICS-17.5** **Undergrounding of Utility Lines:** Require undergrounding of utility lines in new development, except where it is not feasible due to electrical transmission load or other operational issues.

3.18.2 Impact Analysis

3.18.2.1 Methodology

Project impacts to utilities and service systems were evaluated based on information about water supply and associated conveyance infrastructure; wastewater conveyance and treatment infrastructure; and storm drain infrastructure, described within the following Jensen letter reports prepared in 2022: Technical Memorandum Re: *Proposed Rio Del Valle School Expansion Domestic Water Demand and Allocations* (Jensen 2022b); and, *Sewer Preliminary Investigation (Rio Del Valle School Campus Expansion)*(Jensen 2022c). The Jensen letter reports are provided in Appendix H.

3.18.2.2 Significance Thresholds

The thresholds for utility and service system impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. The proposed project would result in a significant impact if it were to:

- *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*
- *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*
- *Would the project 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?*
- *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

3.18.2.3 Project Impacts

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

The proposed project's southern campus expansion area will obtain potable water from a new connection to the City of Oxnard water system. The anticipated point of connection would be from an existing City water line located in the Rose Avenue or Collins Street ROW. An approximately 8-inch diameter water line would deliver water from the City line to the proposed southern campus expansion area. At the time of this writing, it is anticipated that the improvements proposed on the existing campus parcel will utilize water supply from existing allocations and service lines. It is anticipated that the northern campus expansion area will continue to utilize agricultural water from current groundwater well sources.

Jensen prepared a technical memorandum for water demand and allocations for the proposed project school expansion (Jensen 2022b) that calculated the water demand for the proposed expansion to be 48.574 AFY. As shown in Table 3-37, Final Build-Out water usage for buildings (classrooms, restrooms, library, etc.), would represent an increase of 1.846 AFY from the existing 3.027 AFY, to 4.873 AFY, a 61% increase over existing conditions. The RSD proposes to replace all existing and new sports fields with xeriscape and high efficiency landscaping, which will result in a decrease of 83% from an existing 27.33 AFY to 4.654 AFY, a reduction of 22.676 AFY.

Table 3-37. Project Expansion Water Demand by Area

	Existing Area (Ac)	Proposed Area	Final Build-out Area	Change (%)	Existing Water Usage (AFY)	Project Water Usage (AFY)	Final Build-out Water Usage (AFY)
Buildings (Classrooms, Restrooms, Library, etc.)	1.58	0.96	2.54	61%	3.027 ¹	1.846	4.873
Landscaping ² , Planters, etc.	10.97	1.868	1.86	-83%	27.33 ³	-22.676	4.654
Total:	12.55	2.828	4.4	-0.22	30.357	-20.83	9.527

Source: Jensen 2022b

Notes:

- ¹ Value based on the maximum monthly usage (112 HCF) from UCWD Water Bills.
- ² Excludes farm-land/agricultural learning irrigation and excludes xeriscape sports fields.
- ³ Average annual well extraction, see Table 3-35.

The southern campus expansion area will include a bus washing facility. Projected water demand for the proposed bus wash located on the southern parcel are as shown in Table 3-38. Assuming a quantity of 24 buses washed at a frequency of one wash per bus per week with a flow rate of 250 gallons per minute (gpm) at the washing facility for a period of 5 minutes per wash, an estimated 4.787 AFY would be used.

Table 3-38. Projected Bus Wash Demand

Quantity	Units	Source
24	buses	Number of proposed bus parking spaces
1	wash/bus/week	Assumption
250	gpm	4-Brush-Hybrid-WRS-specs-PLC-1.pdf (interclean.com)
5	minutes/wash	Assumption
4.787	AFY	

Source: Jensen 2022b

The northern campus expansion area includes a 10-acre farm which will require irrigation water for crops. Using the FCGMA Crop Year Irrigation Allowance Table, and assuming the crops are avocados with 20–70% ground shading and typical precipitation, the farm will require 2.0 acre-feet/acre. Given that the farm is 10 acres, this results in 20 AFY demand for the new farm (Jensen 2022b).

Table 3-39 provides full build-out water consumption projections of all proposed uses (Buildings, Landscaping, Agricultural Use, and Bus Wash). Total RSD water demand is estimated at 48.574 AFY. FCGMA water allocations, including existing allocations and water that will be transferred to RSD with the newly acquired land, would result in a total of 66.275 AFY. With the total water allocations associated with the proposed project campus expansion, RSD would have a net surplus of 17.701 AFY.

Considering that the proposed project would result in a net decrease in water use from current levels and will consume over 17.70 AFY of water less than the total water supply allocated for the middle school property, the proposed project would not require or result in the relocation or construction of new or expanded water facilities. Therefore, impacts would be less than significant.

Table 3-39. Rio School District Water Demands and Allocations

Water Demand	Quantity (AFY)	Water Source	Reference
Rio Real School (Landscaping)	14.26	FCGMA	See Table 3-23
Rio Del Valle – Full Build-out, Buildings	4.873	United Water	See Table 3-25
Rio Del Valle – Full Build-out, Landscaping	4.654	FCGMA	See Table 3-25
Rio Del Valle – Farm/Agricultural Learning	20	FCGMA	FCGMA Crop Irrigation Table
Rio Del Valle – Bus Wash	4.787	FCGMA	See Table 3-26
Total RSD Water Demand	48.574		
FCGMA Water Allocations (AFY)			
RSD Existing FCGMA Allocations	11.675 ¹		
Water Allocations Acquired from Expansion Areas	54.6		
Total FCGMA Water Allocations	66.275		
Net Proposed Project Water Demand:	-17.701		

Source: Jensen 2022b

Notes:

- ¹ Total water allocations remaining for the two wells located at Rio Real School and RDV Middle School.

At the time of developing this Draft EIR, the precise routing of the storm water drainage features and discharge location to Collins Street had not been finalized. Through a combination of stormwater control measures, proposed project impacts on stormwater drainage facilities would be less than significant.

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

The proposed project will connect to the existing 8-inch Southern California Gas main line currently serving the existing middle school. Natural gas will be used to power various assets including appliances, such as stoves and ovens, and equipment such as water heaters, boilers, and classroom heaters (furnaces). The proposed project is planned to connect to existing utility lines and local telecommunication providers and is not anticipated to require the construction or relocation of electric power, natural gas, or telecommunication facilities. The project Site area is adjacent to existing service infrastructure and will make any required upgrades to connect to existing utility lines and providers. Utility providers within the City are included on the distribution list for the environmental documents pertaining to the proposed project (including the IS). Therefore, project impact would be less than significant.

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

As discussed above and shown in Table 3-39, the combined water demand for the RSD, including the Rio Real School landscaping, full build-out of RDV, including landscaping and buildings, the proposed northern campus expansion area, and the southern campus expansion area bus wash, would be 48.754 AFY. With existing and acquired allocations from the northern and southern campus expansion areas, total water allocations are 66.275 AFY, representing a 17.701 AFY surplus. Even with scheduled cutbacks in supply and extractions by the City and the various water agencies, the proposed project is anticipated to have sufficient water supplies for the reasonably foreseeable future. Further, as described above, the City anticipates that the AWPf will provide up to 11,900 AFY of recycled water for IPR. The recently announced \$48 million WIFIA EPA loan will support the City's Aquifer Storage Recovery Project which will help to expand the City's recycled water supply. These programs will supplement the already substantial water supply allocation of the proposed project. Therefore, project impacts to water supply would be less than significant.

Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Proposed average sewer generation is estimated as a factor of the site's water demand. Water demand was calculated in the Proposed Rio Del Valle School Expansion Domestic Water Demand and Allocations Technical Memorandum prepared by Jensen (Jensen 2022b). Table 3-40 shows the expected water demands for the Site's wastewater-producing sources.

Per the City's Wastewater Rate Sheet effective September 1, 2021 (Appendix 5.3), schools are charged assuming an 85% rate of water return. Therefore, it is estimated that wastewater flows generated by domestic metered project Site areas will be 85% of their water demands.

It is estimated that 25% of bus wash water demand will discharge to the City's sewer system. Although RSD will be required to recycle wash water, some wastewater is expected from maintenance activities such as back flushing

filters. Based on these assumptions, project-generated wastewater production is estimated at 5.339 AFY, or 4,766 gpd (Jensen 2022c).

Table 3-40. Projected Sewer Generation

	Water Demand (AFY)	Rate of Return	Wastewater Production (AFY)
Buildings (Full Build-Out)	4.873	85%	4.142
Bus Wash	4.787	25%	1.197
Total	9.660		5.339
		Total	4,766 gpd

Source: Jensen 2022c

According to the City of Oxnard Wastewater Master Plan Update, the 15-inch line in Auto Center Drive has sufficient capacity to meet hydraulic requirements for its projected ultimate demand. The 8-inch main upstream in Via Estrada and Collins Street was not evaluated as part of the Jensen study. Additionally, the project Site falls outside of the Master Plan Update Study Area and therefore was not considered a potential contributor to the City's wastewater system.

The increase in sewer flow due to the proposed project was analyzed to show its impact on existing infrastructure. It was assumed that the sewer main is at the maximum acceptable depth/diameter ratio for peak flows in the existing condition. The increase in sewer flow created by the proposed project was compared to the assumed existing condition flowrate. Pipe capacity analysis results are included in Appendix 5.4 of the Sewer Preliminary Investigation (Jensen 2022c). Table 3-41 summarizes these pipe capacity analysis results.

Table 3-41. Impact of Proposed Project Improvements on Peak Wet Weather Flows

Sewer Main Size	Max Flow Depth, Q _{ppw}	Q _{ppw}	Additional Q _{ppw}	Increase in Q _{ppw}	Proposed Max Flow Depth, Q _{ppw}
(in)	(in)	(cfs)	(cfs)	(%)	(in)
8	4.0	0.343	0.018	5.0	4.0
15	10.0	1.911	0.018	0.9	10.0

Source: Jensen 2022c

The increased flows do not produce a measurable increase in maximum flow depth. Therefore, the d/D ratio will not increase during peak wet weather flows, even if the existing condition is already at the maximum d/D ratio.

The existing 8-inch sewer line that the project Site will connect to, as well as the 15-inch trunk line immediately downstream, meet City of Oxnard standards and capacity criteria. They are sufficiently sized to accommodate the needs of the proposed project.

Therefore, the proposed project impacts on existing wastewater treatment facilities and sewer systems will be designed to meet City requirements. As part of standard development procedures, Site plans would be submitted to the City of Oxnard for review and approval to ensure adequate wastewater capacity prior to construction. Therefore, with the implementation of UTIL-1 and compliance with existing City of Oxnard requirements, project impact to wastewater capacity would be less than significant.

Would the project 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?

It is anticipated that the City of Oxnard will provide solid waste service during operation of the proposed project through the annexation process planned as part of the proposed project. CalRecycle provides solid waste generation rates for school use. As shown in Table 3-42, based on a rate of 0.6 lbs/person/day for school use (CalRecycle 2022c), the existing RDV campus generates approximately 0.27 tons per day (tpd) of solid waste, and, assuming a 180-day school year, 48.01 tons per year (tpy). The proposed project at full build-out is assumed to potentially generate approximately 0.35 tpd and 62.64 tpy, an increase of 0.08 tpd over existing generation.

Table 3-42. Projected Solid Waste Generation

	Existing Population	Existing Solid Waste Generation (Tons/Day)	Existing Annual Solid Waste Generation (Tons/Year)	Project Population	Project Solid Waste Generation (Tons/Day)	Project Solid Waste Generation (Tons/Year)
Students	819	0.25	44.23	1,065	0.32	57.51
Staff	70	0.02	3.78	95	0.03	5.13
Total:	889	0.27	48.01	1,160	0.35	62.64

Source: Solid Waste Generation Rate of 0.6 lbs/person/day (CalRecycle 2022c)

As discussed in the Environmental Setting, the Toland Landfill has a permitted capacity of 2,500 tpd, the SVLRC has a capacity of 3,000 tpd, and the Del Norte MRF facility has a permitted capacity of 2,779 tpd of recyclable waste. With the expected 67% diversion rate mandated by AB 939, the amount of solid waste from the proposed project sent to area landfills would be reduced to approximately 0.11 tpd, accounting for approximately .005% and .004% of the daily capacities of Toland Road Landfill and SVLRC, respectively. Both these landfills would have adequate capacity to accommodate the incremental increase in solid waste generated by the proposed project. The landfill-diverted recyclable component would comprise .008% of the Del Norte MRF facility permitted capacity. Based on these assumptions for generation rates and diversion percentages accomplished by the proposed project, impacts to solid waste capacity would be less than significant.

Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The RSD in general, and the RDV school in particular are currently in compliance with all federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed project would require continued conformance with these statutes and regulations, including continued participation of the RDV school in existing City recycling programs. Modification of the existing Waste Management Plan will also be required to include the proposed expanded facilities. All new construction will also be required to achieve the 65% diversion requirement per CALGreen standards. The revised plan must be prepared and submitted to the City of Oxnard Environmental Resources Division prior to the issuance of a building permit. Assuming the RDV school remains in compliance with the specified regulations and statutes regarding local management and reduction of solid waste, impacts to solid waste regulations would be less than significant.

3.18.2.4 Cumulative Impacts

The General Plan considers probable future projects, each of which would have to undergo the CEQA process individually. The buildout of the proposed project must consider the demand of the proposed project within the CEQA process. The City of Oxnard UWMP is based on 2030 General Plan buildout, and therefore addresses cumulative impacts in nature. Additionally, the proposed project and all future development projects in the City will be required to comply with standard water conservation requirements of the City, State, and California Building

Code. These include the use of low-flush toilets and urinals, compliance with statewide efficiency standards for shower heads and faucets, and insulation of pipes to reduce water used before hot water reaches equipment or fixtures. Given the proposed project's excess water supply allocation of 17.701 AFY over estimated project demand and therefore compliance with water neutrality as required by the City, the increase of demand on the City water supply will be mitigated. Storm water drainage, electric power, natural gas, and telecommunications facilities are proposed to connect to already existing systems and service providers. Solid waste disposal will be provided by existing carriers. Solid waste generation represents a very small fraction of overall City permitted landfill and recycling facility capacity, and the proposed project would not result in a significant cumulative impact to waste disposal facilities. Per CALGreen requirements, a minimum of 65% of nonhazardous construction and demolition waste will be recycled and/or salvaged for reuse. The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when classrooms are unoccupied. The electrical systems will include energy-efficient LED lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The project Site parking lots and pathway pole-mounted lighting and sports field and court lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the proposed project will be an energy-efficient type complying with the most recent energy code. Therefore, cumulative impacts of the proposed project on utilities and service systems would be less than significant.

3.18.2.5 Mitigation Measures

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

UTIL-1: RSD shall submit the anticipated sewer flow rates for the proposed project to the City so that it can be analyzed using the City's sewer model. Based on the results, RSD shall coordinate with the City regarding the final sewer design including any required improvements needed to provide adequate sewer service to the project Site.

3.18.2.6 Level of Impact After Mitigation

With the implementation of Mitigation Measure UTIL-1, potential project impacts on utilities and service systems would be reduced to less than significant.

4.0 OTHER CEQA CONSIDERATIONS

4.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGE

According to the CEQA Guidelines, “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.” Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided.

Both construction and operation of the proposed project would lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The middle school expansion would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project Site. Consumption of these resources would occur with any development in the region and is not unique to the proposed project. It is not anticipated that the development of the project would significantly affect local or regional resource supplies.

Implementation of the proposed project would result in the conversion of agricultural land into educational uses, resulting in a permanent loss of 7.9 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. As identified in Section 3.2 of this EIR, the City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) accounted for the conversion of up to 2,215 acres of important farmland (defined as Prime Farmland and Farmland of Statewide Importance) to non-agricultural use and determined the impact to be significant and unavoidable. No feasible mitigation measures were available to reduce the impact to a less than significant level (City of Oxnard 2009). While the proposed project was found to not have a significant impact on agricultural land use under the CDC LESA methodology, the proposed project would involve the conversion of greater than 5 acres of Prime/Statewide Important Farmland. Under the County of Ventura ISAG criteria, the proposed project results in a significant impact due to the conversion of important farmland to non-farmland uses.

The additional vehicle trips associated with the proposed project would incrementally increase local traffic, noise levels and regional air pollutant emissions. With the implementation of mitigation measures, impacts associated with increased local traffic, noise levels and regional air pollutant emissions would be less than significant.

As discussed in Sections 3.5 and 3.17, Cultural and Tribal Cultural Resources, the proposed project has the potential to impact unknown sensitive cultural and tribal cultural resources on the project Site. With the implementation of mitigation measures, impacts associated with cultural and tribal cultural resources would be less than significant.

Title 24 of the California Administrative Code regulates the amount of energy consumed by new development. Nevertheless, the consumption of such resources would represent a long-term commitment of those resources. The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth and planned changes on the project Site and within the general vicinity to accommodate existing and projected future student enrollment within the District.

4.2 GROWTH-INDUCING IMPACTS

Pursuant to the CEQA Guidelines (Section 15126.2(d)): an EIR must address whether a project will directly or indirectly foster growth as follows: “[An EIR shall] discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of wastewater treatment plant, might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also, discuss the characteristic of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

As discussed below, this analysis evaluates whether the proposed project would directly or indirectly induce economic, population, or housing growth in the surrounding environment.

Direct Growth-Inducing Impacts in the Surrounding Environment

Direct growth-inducing impacts occur when the development of a project induces population growth or the construction of additional developments in the same area of a proposed project and produces related growth-associated impacts. Growth-inducing projects remove physical obstacles to population growth, such as the construction of a new road into an undeveloped area, a wastewater treatment plant expansion, and projects that allow new development in the service area. Construction of such infrastructure projects are considered in relation to the potential development and the potential environmental impacts.

The proposed project would not directly induce growth as it does not involve residential development. School uses are considered growth accommodating uses, instead of growth-inducing, as new or expanded schools are typically built in order to serve the educational needs of the existing and forecast populations. The proposed new neighborhood middle school facilities are needed to accommodate existing and anticipated future enrollment in the District. The recreational facilities associated with the proposed project will provide the community with additional recreation opportunities after school hours. In addition, the proposed project would not remove obstacles to regional growth and related development. Therefore, no significant impacts related to direct growth inducement would occur.

Indirect Growth-Inducing Impacts in the Surrounding Environment

The proposed project would not indirectly induce growth through substantial increase in employment opportunities or an employment-related increase in population. Construction workers for the proposed project are expected to be drawn from the local labor pool. During operation, the proposed project would have approximately 95 employees, an increase of 25 over existing staffing. Although it is expected that most of these opportunities would be filled by residents of communities adjacent to the project Site, the proposed project could indirectly result in a minimal growth in population of the immediate area. This minimal growth would not represent unplanned population growth in the community or result in economic growth that exceeds levels anticipated in plans adopted by the City. Therefore, no significant impacts related to indirect growth inducement would occur.

4.3 SIGNIFICANT UNAVOIDABLE IMPACTS

This EIR evaluates the potential environmental impacts of the proposed project and identifies mitigation measures that would avoid, reduce, or minimize impacts when feasible. For almost all of the significance criteria, potential impacts would be mitigated to less than significant. However, the proposed project would result in significant unavoidable impacts in the following area:

Agriculture (Converting Farmland of Statewide Importance to Non-Agricultural Use)

The RSD is requesting annexation of the proposed project Site into the City of Oxnard. In addition to the annexation request, concurrent entitlements from the City of Oxnard may include a General Plan Amendment and Zoning/Pre-Zoning Requests. It is anticipated that the Site will obtain a General Plan designation of School (SCH) and a zoning designation of C-R.

Implementation of the proposed project would result in the conversion of agricultural land into educational uses. While the General Plan and Zoning designations for the approximately 10 acres on the northern campus expansion area of the project Site will change, the area will be used as an outdoor working farm “classroom.” Therefore, the proposed project would not convert the northern campus expansion area to a non-agricultural use.

As identified in Section 3.2 of this EIR, development of the southern campus expansion area with school uses would result in the permanent loss of approximately 7.9 acres of Prime Farmland and 2.9 acres Farmland of Statewide Importance. As identified in Section 3.2 of this EIR, the City of Oxnard 2030 General Plan Program EIR (City of Oxnard 2009) accounted for the conversion of up to 2,215 acres of important farmland (defined as Prime Farmland and Farmland of Statewide Importance) to non-agricultural use and determined the impact to be significant and unavoidable. No feasible mitigation measures were available to reduce the impact to a less than significant level (City of Oxnard 2009). While the proposed project was found to not have a significant impact on agricultural land use under the CDC LESA methodology, the proposed project would involve the conversion of greater than 5 acres of Prime/Statewide Important Farmland. Under the County of Ventura ISAG criteria, the proposed project results in a significant impact due to the conversion of important farmland to non-farmland uses. Mitigation Measure AG-1 is provided as a partial mitigation measure for the loss of important farmland. Nonetheless, conversion of agricultural land at the project level would remain a significant and unavoidable impact.

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5.0 ALTERNATIVES

5.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS FOR ALTERNATIVE ANALYSIS

This section discusses the alternatives to the proposed project that would potentially avoid or lessen the significant environmental impacts while obtaining most of the basic Project Objectives. Sufficient information about each alternative is included to allow meaningful evaluation, analysis, and comparison with the project. Per Section 15126.6(d) of the CEQA Guidelines, potential significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines (14 CCR) provide guidance on the alternatives to a project that must be evaluated in an EIR. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (*California Public Resources Code*, Section 21002.1), the discussion of alternatives must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the Project Objectives or would be more costly.

An EIR must describe a range of reasonable and of potentially feasible alternatives to the project, or to the location of the project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. The comparative merits of the alternatives must be evaluated.

An EIR need not consider every conceivable alternative, but it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a “rule of reason” that requires discussion of only those alternatives necessary for the RSD (Lead Agency) to make a reasoned choice.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR:

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the Project Objectives or would be more costly (15126.6[b]).
- The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic Project Objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as (15126.6[d]).
- The specific alternative of “no project” shall also be evaluated along with its impact (15126.6[e][1]). The “no project” analysis shall discuss the existing conditions at the time the NOP is published, or if no NOP is

published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).

- The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making (15126.6[f]).
- For alternative locations, “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR (15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6 [f][3]).

Pursuant to the CEQA Guidelines previously summarized, a reasonable range of alternatives to the project was considered and evaluated in this Draft EIR.

5.2 PROJECT OBJECTIVES

The objectives of the proposed project include the following:

- Address significant community health, safety, and welfare issues including congested traffic and parking conditions;
- Streamline RSD student transportation to improve safety and reduce VMT and mitigate existing on-Site and off-Site parking impacts;
- Accommodate existing and projected future student enrollment within the RSD;
- Locate school facilities within close proximity to students’ residences;
- Provide new facilities that meet the RSD’s educational program specifications;
- Consolidated facilities that reflect the need and efficient use of limited land resources; and
- Ensure cost-effective use of State and local public resources funding sources.

5.3 SUMMARY OF THE PROJECT AND SIGNIFICANT IMPACTS

5.3.1 Summary of Project

RSD proposes to implement the RDV Campus Expansion Master Plan (proposed project) to meet the immediate educational, recreational, and support facilities needs of District students. Enrollment within the District has been increasing and additional facilities are needed now to accommodate the students. The District is currently in escrow to acquire approximately 11.1 acres to the south of the existing campus that would extend the existing RDV campus boundary to Collins Street. This would increase the campus area to approximately 41.3 acres. The proposed project includes development within the expanded campus which would occur in two phases and would include options for:

new classrooms, library and media center, multi-purposed building, transportation and parking facilities, recreational facilities including a 320-meter track, flag football field, six basketball courts, a baseball field, softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, jogging path, an athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts.

5.3.2 Alternatives Considered and Rejected

Section 15126.6(c) of the *CEQA Guidelines* suggests that an EIR identify alternatives that were considered for analysis but rejected as infeasible, then briefly explain the reasons for their rejection.

According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

Expansion of the existing RDV campus as represented has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the RSD's 14 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities, and improve campus vehicle safety.

RSD studied several potential middle school sites and other alternatives and determined that the proposed project Site to be the one that is best available. One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost effective, and District-wide individual school attendance boundary adjustments will be made as needed in the future. These alternatives would not meet two of the Project Objectives of providing new facilities that meet the RSD's educational specifications and building school facilities that reflect the wise and efficient use of limited land resources. Therefore, alternative site locations were considered but rejected.

5.3.3 Alternatives to the Proposed Project

Alternatives considered in this EIR include:

- No Project Alternative – This alternative assumes that improvements described for the proposed project would not be implemented. RSD would not implement any changes to the project Site that would result in changes to existing project Site or existing agricultural uses. Under the No Project Alternative, it is assumed that increases in enrollment would have to be accommodated by the two existing RSD middle schools. RSD buses would remain at a temporary parking facility located at the Oxnard School District Transportation Center (near 516 W. Wooley Road).
- Limited Expansion of Existing Middle Schools Alternative A -- This alternative assumes that improvements to existing RSD middle schools, beyond what is currently planned, would be required to address school capacity.

5.3.3.1 No Project Alternative

According to the *CEQA Guidelines* (Section 15126.6(e)(3)(b)), the No Project Alternative is defined as the "circumstance under which the project does not proceed." Section 15126.6(e) of the CEQA Guidelines requires

analysis of a no project alternative that (1) discusses existing site conditions at the time the NOP is prepared or the EIR is commenced, and (2) analyzes what is reasonably expected to occur in the foreseeable future based on current plans if the proposed project were not approved. Under the No Project Alternative, the proposed project would not be implemented and the current General Plan Land Use land use designation for the project Site would not be amended to allow for the proposed project. There would be a continuation of the existing agricultural land use on the northern and southern campus expansion areas. Potential impacts for the No Project Alternative are discussed as follows.

Aesthetics

Under this alternative, the project Site would remain a middle school in its existing configuration and under agricultural production and would not include any new type of development or uses on the project Site. There would be no change to the visual character of the Site and there would be no new sources of light or glare. There would be no impact to aesthetic resources. Impacts would be reduced in comparison to the proposed project.

Agriculture and Forestry Resources

Under this alternative, the project Site would remain a middle school in its existing configuration and under agricultural production and there would be no loss of Farmlands of Statewide Importance. There would be no impact to agriculture and forestry resources. Impacts would be reduced in comparison to the proposed project.

Air Quality

Implementation of this alternative would not create new sources of regional air emissions. There would be no impact to air quality. Impacts would be reduced in comparison to the proposed project.

Biological Resources

The project area has been disturbed by an existing middle school and agricultural activities and little if any suitable habitat for sensitive wildlife exists on the project Site. Since no changes to land uses are proposed under this alternative, no impacts to existing biological resources on or surrounding the project Site would occur. Impacts would be reduced in comparison to the proposed project.

Cultural Resources

The project area has been disturbed by a middle school site and agricultural activities. This alternative would not include any new type of ground-disturbing activities or involve removal of any cultural resources. No impacts to cultural resources or tribal resources would occur. Impacts would be reduced in comparison to the proposed project.

Energy

This alternative does not include uses that would create new sources of energy consumption. There would be no impact associated with wasteful, inefficient or unnecessary use of energy. Impacts would be reduced in comparison to the proposed project.

Geology and Soils

Under this alternative, the project Site would remain a middle school in its existing configuration and under agricultural production and would not include any new type of development on the project Site. This alternative would not expose people or structures to any geological hazards or result in new activities resulting in soil erosion. There would be no impacts associated with geology and soils. Impacts would be reduced in comparison to the proposed project.

Greenhouse Gas Emissions

This alternative does not include uses that would create new sources of regional air emissions and contribute to global climate change. There would be no impact associated with greenhouse gas emissions. Impacts would be reduced in comparison to the proposed project.

Hazards and Hazardous Materials

Under this alternative, the project Site would remain a middle school in its existing configuration and under agricultural production and would not include any new type of development on the project Site. This alternative would not involve new activities that would expose people or structures to any hazards or hazardous materials. There would be no impacts associated with hazards or hazardous materials. Impacts would be reduced in comparison to the proposed project.

Hydrology and Water Quality

Under this alternative, the project Site would remain a middle school site in its existing configuration and under agricultural production and would not include any new type of development on the project Site. This alternative would not result in new activities resulting in impacts to water quality, depletion of groundwater supplies, changes in drainage or water runoff, or exposure of people or structures to any flooding hazards. There would be no impacts associated with hydrology and water quality. Impacts would be reduced in comparison to the proposed project.

Land Use and Planning

This alternative would not involve any changes to the general plan designation on the project Site. There would be no impacts associated with land use and planning. Impacts would be reduced in comparison to the proposed project.

Mineral Resources

Under this alternative, the project Site would remain under agricultural production and no expansion improvements would occur. This alternative would not require the use of sand, gravel, or aggregate. No impacts would occur and impacts would be reduced in comparison to the proposed project.

Noise

This alternative would not introduce new land uses that would generate construction or operational noise that would increase the ambient noise levels in the surrounding area. No impacts to existing noise levels would occur. Impacts would be reduced in comparison to the proposed project.

Population and Housing

This alternative would not result in an increase in population in the area that would create additional demands on housing. There would be no change with respect to population and housing. Therefore, there would be no impact in comparison to the proposed project.

Public Services

This alternative would not introduce new land uses that would create additional demands on public services at the project Site. No impacts to public services would occur for police, fire, recreation, or other public facilities at the project Site. However, without the proposed expansion of the educational and recreational facilities, the District would have to accommodate existing and anticipated future students at Rio Vista, the other District middle school that could result in adverse impacts to that school and potentially other schools in other school districts within the City of Oxnard. Impacts to public services would be similar in comparison for police, fire, recreation, or other public facilities. Impacts to public schools would be greater in comparison to the proposed project.

Transportation

Under this alternative, expansion of the existing middle school and conversion of the existing agricultural operation to a bus washing facility would not occur. The project Site would remain predominately an existing middle school and under agricultural production. Traffic volumes in the surrounding area would not increase as a result of this alternative. This alternative would not have any impacts to the existing transportation system or traffic volumes and no roadway improvements would be provided. Impacts would be reduced in comparison to the proposed project.

Tribal and Cultural Resources

The project area has been disturbed by a middle school site and agricultural activities. This alternative would not include any new type of ground-disturbing activities or involve removal of any cultural resources. No impacts to cultural resources or tribal resources would occur. Impacts would be reduced in comparison to the proposed project.

Utilities and Service Systems

This alternative would not introduce new land uses that would create additional demands on utilities and service systems. No impacts to utilities and service systems at the project Site would occur. However, without the proposed expansion of the educational and recreational facilities, the RSD would have to accommodate existing and anticipated future students at Rio Vista, the other RSD middle school that could result in adverse utilities and service systems impacts to that middle school and potentially other schools in other school districts within the City of Oxnard. Impacts would be similar in comparison to the proposed project.

Conclusion and Relationship to Project Objectives

The No Project Alternative would result in the continuation of existing conditions on the project Site. The No Project Alternative would result in no significant impacts to any of the issue areas except to public schools. The District would have to accommodate existing and anticipated future students at RDV in its current configuration, and Rio Vista, the sole other District middle school. This could result in adverse impacts to public schools. This would be the environmentally superior alternative; however, the seven Project Objectives would not be met.

5.3.3.2 Limited Expansion of Existing Middle Schools Alternative A

This alternative assumes that improvements to two existing RSD middle schools, beyond what is currently planned, would be required to address school capacity. RSD has two existing middle schools: RDV (current enrollment of 819 students) and Rio Vista (current enrollment of 696). Under this scenario, these two middle schools, with improvements, would handle the projected increase of 250 students over the next 5 years. RDV would stay within the existing school footprint. RSD already owns the RDV north parcel, and it would remain in the Agricultural Learning Program as it would for the proposed project. None of the items proposed on the south parcel, such as Parking Lot A, DTPF, new classroom buildings, the library, multi-purposed building, etc., would be constructed. Potential impacts for the Limited Expansion of Existing Middle Schools Alternative A are discussed as follows.

Aesthetics

Under this alternative, the projected increase of 250 students would be accommodated between the two existing middle-school sites. This would require construction of new classroom facilities within the existing footprint of the schools, resulting in increased density and new sources of light and glare. However, the adjacent parcels to the north and south of the existing RDV campus would remain in agriculture, resulting in a reduction in impacts in comparison to the proposed project.

This alternative would require construction at existing middle school sites, resulting in visual impacts from temporary construction activities in two locations. Construction activities would be temporary and short-term and thus would have minimal effect on aesthetics and visual quality, resulting in a less than significant impact. Impacts would be reduced in comparison to the proposed project.

Agriculture and Forestry Resources

Under this alternative, the expansion areas would remain under agricultural production and expansion improvements would occur within the footprints of the two existing middle schools, so there would be no loss of Prime Farmlands or Farmlands of Statewide Importance. There would be no impact to agriculture and forestry resources. Impacts would be reduced in comparison to the proposed project.

Air Quality

Implementation of this alternative would involve construction at two existing middle school sites and increased enrollment (approximately 125 students and attendant personnel) at those schools. This alternative would not result in population growth above what is forecasted in the 2030 General Plan and in turn the 2016 AQMP. Therefore, this alternative would not conflict or obstruct implementation of the applicable 2016 AQMP and the impact would be less than significant.

Construction emissions associated with limited classroom construction would occur at each school, but due to the limited space within the existing footprints of each school, the parking lots, playing fields, athletic courts, etc. would not be constructed. Thus, construction emissions resulting from this alternative would be less than the proposed project and not be expected to have a significant impact on the environment.

Long-term or operational emissions are emissions that result from activities conducted during the operation of a project (e.g., heating, employee commute, student drop-off and pickup, and facility upkeep). Operational emissions from the existing two middle schools would be increased through any additional building square footage and increase in student enrollment. The combined increase from the expanded middle schools is expected to be similar to the proposed project, as a similar number of additional students would be accommodated. However, this would depend on whether energy saving features, similar to the proposed project, could be implemented at the existing middle school sites. Many of the facilities proposed for the southern parcel would not be developed due to space constraints within the footprints of the existing middle schools. Impacts would be less than significant and less in comparison to the proposed project.

Biological Resources

The project areas (existing RDV and Rio Vista schools) have been disturbed by existing middle schools and by agricultural activities, and little if any suitable habitat for sensitive wildlife exists on the project Site. Since no changes to land uses are proposed under this alternative, no impacts to existing biological resources on or surrounding the project Sites would occur. Similarly, expansion improvements would occur at the existing middle schools. And, while expansion improvements may involve the removal of existing landscaped vegetation to construct or place new permanent or portable classrooms, little if any suitable habitat for sensitive wildlife is expected at these sites. Less than significant impacts would occur. Impacts would be reduced in comparison to the proposed project.

Cultural Resources

The project area has been disturbed by existing middle school and agricultural activities. Expansion improvements would occur at the two existing middle schools where the sites have been disturbed by school construction. This alternative would not include any ground-disturbing activities in locations not previously surveyed or involve removal of any cultural resources. No impacts to cultural resources or tribal resources would occur. Impacts would be reduced in comparison to the proposed project.

Energy

As with the proposed project, expansion construction would be temporary and not anticipated to result in wasteful, inefficient, or unnecessary use of energy. Energy use from the existing middle schools would be increased through any additional building square footage and increase in student enrollment. The combined increase from the expanded middle schools is expected to be less than the proposed project. A similar number of additional students

would be accommodated between the two schools. However, many of the other improvements proposed for the southern RDV parcel would not be developed due to space constraints on the existing RDV campus. Since many of the proposed facilities would not be developed, impacts would be less than significant and less in comparison to the proposed project.

Geology and Soils

Under this alternative, the expansion areas would remain under agricultural production and expansion improvements would occur within the footprints of the two existing middle schools. This alternative would expose a similar amount of people and structures to geological hazards and soil erosion as the proposed project.

Expansion improvements to the two existing middle schools would require that the building design for any expansion structures use geotechnical building design recommendations that are based on a Site-specific ground motion hazard analysis for each expansion site in accordance with ASCE 7-10 (ASCE 2013) Chapter 21 as modified by Section 1803A.6 of the 2016 CBC (ICC 2017). Soil erosion could potentially occur during expansion construction activities would be reduced to a less than significant level with standard erosion mitigation measures, including the use of BMPs such as fiber rolls, silt fencing, and other erosion control devices as determined by site-specific conditions. Impacts would be less than significant and reduced in comparison to the proposed project.

Greenhouse Gas Emissions

This alternative would generate GHGs during construction and operation activities. GHG emissions from the existing middle schools would be increased through any additional building square footage and increase in student enrollment. The combined increase from the expanded middle schools is expected to be similar to the proposed project, as a similar number of additional students would be accommodated. However, many of the other improvements proposed for the southern RDV parcel would not be developed due to space constraints on the existing RDV campus. Since many of the proposed facilities would not be developed, impacts would be less than significant and less in comparison to the proposed project.

Hazards and Hazardous Materials

Under this alternative, the expansion areas would remain under agricultural production and expansion improvements would occur within the footprints of the two existing middle schools. The expansion improvements would occur on two existing middle school sites and would therefore not be located on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and no project impact would result. Impacts would be less than significant and less in comparison to the proposed project since any expansion to accommodate an increase in student population would be within the existing school footprints.

Hydrology and Water Quality

Under this alternative, the expansion areas would remain under agricultural production and expansion improvements would occur within the footprints of the two existing middle schools. This alternative would not result in new activities resulting in impacts to water quality, depletion of groundwater supplies, changes in drainage or water runoff, or exposure of people or structures to any flooding hazards on the project Site.

The expansion improvements would occur on existing middle school sites and impacts associated with depletion of groundwater supplies or exposure of people or structures to any flooding hazards would not be expected. Water quality or changes in drainage or water runoff impacts associated with the expansion construction would require implementation of construction BMPs, reducing impacts to less than significant. Impacts would be reduced in comparison to the proposed project.

Land Use and Planning

This alternative would not involve any changes to the general plan land use designations on the project Site. The expansion improvements would occur on two existing middle school sites and no changes to each site's General Plan land use or zoning designations would occur. There would be no impacts associated with land use and planning. Impacts would be reduced in comparison to the proposed project.

Mineral Resources

Under this alternative, the expansion areas would remain under agricultural production and expansion improvements would occur within the footprints of the two existing middle schools. While potential improvements associated with this alternative would require the use of sand, gravel, and aggregate during construction, due to the limited quantity used in comparison to the level of development being experienced in the City of Oxnard and the region, this alternative would not require such a substantial portion of the existing mineral resources in the area to create a shortage of supplies for other projects and consumers. Since mineral resource use would be so minor, impacts of this alternative would be even less than the proposed project.

Noise

This alternative would not introduce new land uses to the project Site that would increase the ambient noise levels, on a construction or operational basis, beyond those anticipated for the proposed project.

The expansion improvements would occur on two existing middle school sites and noise and groundborne vibration generated by expansion construction would be less than the proposed project but would occur at two locations. If construction takes place during the school year, noise levels could be disruptive to student and faculty populations at the existing middle school facilities. Mitigation in conformance with Mitigation Measure N-1 would be required to reduce these impacts to less than significant.

During operation, traffic levels would increase at the two middle schools in relation to increased enrollment. However, none of the attendant facilities, such as sports fields and courts, library, bus washing facility, and parking lots, would be constructed. These would all be sources of operational noise. Similar to the proposed project, the associated increases in ADT would likely represent an increase of less than 1 dBA at the residences adjacent to the existing middle schools and would have minimal impact on traffic noise conditions. As these are existing middle schools, noise from rooftop mechanical equipment would not be expected to change significantly and would be less than the proposed project. Operational noise impacts would be less than significant. Impacts would be less in comparison to the proposed project.

Population and Housing

This alternative would not result in an increase in population in the area that would create additional demands on housing. The proposed project would be growth accommodating, not growth inducing. Increased demand for school services is generally linked to changes in local land use patterns such as the construction of new dwelling units and the generation of new jobs that encourages new people to move into the area. There would be no change with respect to population and housing. Therefore, impacts would be the same in comparison to the proposed project.

Public Services

This alternative would not introduce new land uses that would create additional demands on public services at the project Site. However, this alternative would require the District to accommodate existing and anticipated future students within the footprints of the two existing middle schools, which could result in overcrowding at the existing facilities, and therefore adverse impacts to public schools. Demands on other public services, police, fire, or other public facilities, may increase incrementally with the increase in enrollment. Impacts to recreational facilities would be greater since the playing fields and courts associated with the proposed project would not be constructed under

this alternative, thereby putting greater pressure on existing facilities. Impacts to public schools would be greater in comparison to the proposed project.

Transportation

Under this alternative, the expansion areas would remain under agricultural production and expansion improvements would occur within the footprints of the two existing middle schools. Traffic volumes in the surrounding area would increase slightly as a result of the increased student and administrative populations associated with this alternative, but less than with the proposed project.

While the proposed project is expected to add traffic within the study-area, the expansion of the two existing middle schools would also capture school related trips within the study-area (tour-based VMT), resulting in an overall reduction of school related trip lengths for parents and students. Under this alternative, there would still be an overall reduction of school related trip lengths for parents and students. Traffic levels would increase at the two middle schools in relation to increased enrollment. Impacts would be less in comparison to the proposed project.

Tribal and Cultural Resources

Under this alternative, the project Site would remain a middle school in its existing configuration and under agricultural production and would not include any new type of development on the project Site. Any additional facility construction would occur within the existing footprints of the two District middle schools. No expansion into the northern and southern campus expansion areas would occur, and all ground-disturbing activities would be conducted on previously surveyed lands. Therefore, impacts would be reduced in comparison to the proposed project.

Utilities and Service Systems

This alternative would not introduce new land uses but would create additional demands on utilities and service systems to accommodate anticipated student growth on the two existing District middle schools. Demands on utilities and service systems at these existing middle schools would increase incrementally with the increase in enrollment. However, many of the other improvements proposed for the southern RDV parcel would not be developed due to space constraints on the existing RDV campus. Since many of the proposed facilities would not be developed, impacts would be less than significant and less in comparison to the proposed project.

Conclusion and Relationship to Project Objectives

The Limited Expansion of Existing Middle Schools Alternative A would result in an expansion of facilities and an increase in student population on the project Site. The Limited Expansion of Existing Middle Schools Alternative A would have similar or greater impacts in some issue areas and reduce impacts in other issue areas. Since the impacts associated with this alternative would be confined within the footprints of existing schools, it would avoid the significant and unavoidable impacts to agricultural land conversion (Agriculture and Forestry Resources). However, only some of the seven Project Objectives would be met.

5.3.4 Environmentally Superior Alternative

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

Table 5-1 provides a comparison of each alternative. The No Project Alternative would result in no or less than significant impacts to any of the issue areas except to public schools. The District would have to accommodate

existing and anticipated future students at the two District middle schools in their current configurations, which could result in adverse impacts to public schools.

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

Table 5-1. Summary of Project Alternatives

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

Notes:

NI	No Impact
LTS	Less Than Significant
LTS/M	Less Than Significant with Mitigation
S	Significant and Unavoidable

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City of Oxnard

- Vyto Adomaitis
- Tai Chau
- Joe Pearson II
- Jose Rivera
- Kenneth Rozell

California Department of Education

- John Gordon

Department of Toxic Substances Control

- Johnson Abraham
- Shahir Haddad, P.E.
- Joe Hwong, P.G., C.HG.

Division of the State Architect

- Douglas Humphrey

Ventura County

- Aaron Engstrom
- Gianfranco Laurie
- Donald Nielsen
- Dave Ward, AICP
- Winston Wright

Ventura Local Agency Formation Commission

- Kai Luoma
- Andrea Ozdy

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APPENDICES – VOLUME II

APPENDIX A: NOP/IS, SCOPING MEETING MATERIALS, AND COMMENT LETTERS RECEIVED

APPENDIX B: AIR QUALITY REPORTS

APPENDIX C: CULTURAL RESOURCES REPORT

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APPENDIX I: TRAFFIC AND CIRCULATION STUDY AND VMT ANALYSIS

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