

City of Oxnard

Teal Club Specific Plan

Recirculated Draft
**Environmental
Impact Report**
SCH# 2012051080
City of Oxnard EIR# 2015-01



December 2021

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Recirculated Draft

Environmental Impact Report

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Appendices

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Appendix B	California Agricultural Land Evaluation and Site Assessment (LESA) Model Worksheet
Appendix C	Air Quality and Greenhouse Gas Modeling Results
Appendix D	Geological Investigation
Appendix E	Phase I Environmental Site Assessment (ESA)
Appendix F	Aircraft Hazard and Land Use Risk Assessment
Appendix G	Preliminary Drainage Report
Appendix H	Noise Measurements and Modeling Results
Appendix I	Traffic Impact Study
Appendix J	Water Supply Assessment
Appendix K	Teal Club Development Infrastructure Review



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EXECUTIVE SUMMARY

This section summarizes the characteristics of the proposed project and the significant environmental impacts, mitigation measures, and residual impacts associated with the proposed project.

PROJECT SYNOPSIS

Project Applicant

Teal Club Specific Plan Applicant:

Borchard Property Co-Owners
211 Village Commons Boulevard #15
Camarillo, California 93012
Applicant's Representative: Dennis Hardgrave, (805) 484-8303

Applicant for CMWD, MWD, and LAFCo Annexations:

City of Oxnard, Planning Division
214 South C Street
Oxnard, California 93030
Contact: Jay Dobrowalski, (805) 385-3948

Project Location

The 161.12-acre project area (149.72-acre Teal Club Specific Plan (TCSP) area and 11.4 separate acres south of Teal Club Road) is located within the unincorporated area of Ventura County adjacent to the west of the City of Oxnard, within the City of Oxnard Sphere of Influence (SOI), and north of the Oxnard Airport. The Teal Club Specific Plan area is within the established City of Oxnard Urban Restriction Boundary (CURB). The project area is bounded on the north, south, and east by the City of Oxnard. The TCSP area comprises seven contiguous assessor's parcels bounded by Doris Avenue on the north, Patterson Road and a planned future site for Oxnard School District educational facilities on the west, Teal Club Road on the south, and Ventura Road on the east. The additional annexation area comprises nine assessor's parcels on the south side of Teal Club Road, north and west of Little Farms Road and bisected by Mallard Way. The project location and jurisdiction boundary is illustrated on Figure 2-2 in Section 2.0, *Project Description*.

Project Description

Teal Club Specific Plan (TCSP). The TCSP was developed to be consistent with the 2030 General Plan and related City Master Plans and policies, and in consultation with the Oxnard School District (OSD) and Oxnard High School District (OHSD). The TCSP sets forth a proposed development program within 14 proposed Planning Areas (PA) for a mix of land uses on the approximately 149.72-acre TCSP portion of the project area. The TCSP area does not include the additional annexation parcels, totaling 11.4 acres south of Teal Club Road.



Table ES-1 provides a breakdown of the proposed land uses, followed by general descriptions of land uses. After the Local Area Formation Commission (LAFCo) approval of the annexation, the TCSP area Pre-Zoning would convert to City of Oxnard zoning, subject to provisions of the adopted TCSP, if applicable.

**Table ES-1
Proposed Land Uses**

Land Use	Maximum Density	Total Planned			
		Acres ¹	Units ²	Density	Square Feet
TEAL CLUB SPECIFIC PLAN AREA					
RESIDENTIAL					
PA-1 Detached Cluster Residential	10 DU/Ac.	17.52	140	8 DU/Ac.	-
PA-2 Detached Cluster Residential	10 DU/Ac.	10.01	80	8 DU/Ac.	-
Subtotal Single-Family Detached	-	27.53	220	-	-
PA-3 Attached Residential	18 DU/Ac.	9.60	145	15DU/Ac.	-
PA-4 Attached Residential	18 DU/Ac.	5.54	88	16 DU/Ac.	-
PA-5 Attached Residential	30 DU/Ac.	10.57	240	23 DU/Ac.	-
PA-11 Attached Residential	12 DU/Ac.	15.64	167	11 DU/Ac.	-
PA-12 Attached Residential	30 DU/Ac.	4.43	100	23 DU/Ac.	-
Commercial/Mixed Use (Residential)	-	0.0	30	-	-
Subtotal Multi-Family	-	45.78	770	-	-
TOTAL RESIDENTIAL	-	73.31	990	-	-
(Affordable Units)			148³		
NON-RESIDENTIAL					
PA-8 Community Park	-	6.50	0	-	-
PA-9 Community Park	-	3.50	0	-	-
PA-10 Community Park	-	7.38	0	-	-
Beverly Dr. Greenbelt		0.38	0		
Parks & Open Space Subtotal		17.76	0	-	-
PA-6 Commercial/Mixed Use	-	4.35	0	-	10,000
PA-7 Urban Village Commercial	-	4.43	0	-	50,000
Commercial/Mixed Use Subtotal	-	8.78	0	-	60,000
PA-13 Business Research Park	-	6.19	0	-	88,000
PA-14 Business Research Park	-	2.92	0	-	44,000
Light Industrial Subtotal	-	9.11	0	-	132,000
Ventura Road	-	2.82	0	-	-
Doris Avenue	-	2.80	0	-	-
Patterson Road	-	0.30	0	-	-
Teal Club Road	-	7.20	0	-	-



Land Use	Maximum Density	Total Planned			
		Acres ¹	Units ²	Density	Square Feet
Arterial Roadways Subtotal	-	13.12	0	-	-
Interior Roadways shown in Fig. 2-3	-	22,18	0	-	-
Detention Basins	-	5.46	0	-	-
Interior Roadways & Misc. Subtotal	-	27.64	0	-	-
TOTAL TCSP AREA	-	149.72	990	-	192,000
ADDITIONAL PARCELS SOUTH OF TEAL CLUB ROAD (see Subsection 2.5.2)					
Manufacturing Space	-	~5.7 ⁴	-	-	173,804
Warehouse Space	-	~5.7 ⁴	-	-	173,804
Additional Parcels Subtotal	-	11.4	-	-	347,608

Sources: Development Planning Services, July 2019; City of Oxnard, 2019.

PA = Planning Area

¹ land use acres shown in this table are Net Area, measured from the right-of-way line of streets shown in the Teal Club Specific Plan Land Use Plan, Figure 2-3.

² The number of units within any residential land use area may be refined during the course of subsequent City review and approval, provided that the total number of units within the Specific Plan does not increase beyond that shown in this table, or subsequent CEQA analysis shows that the level of development would not result in new or substantially more significant impacts would occur requiring further CEQA review.

³ Includes approximately 148 affordable units. The affordable units would comprise 15% of the total project area residential development, as the entire residential project area is defined as "Urban Village". Levels of affordability would be approximately 40% Very Low income and 60% Low income. Approximately 80 affordable units would be built as part of Phase 1 and 40 as part of Phase 2. Affordable units would be generally distributed between Planning Areas 5, 11 and 12.

⁴ Assumed half of 11.4-acre area for manufacturing space (5.7 acres) and half for warehouse space (5.7 acres)

Residential Land Use. The TCSP envisions development of up to 990 residential dwelling units in a variety of densities and product types including both market-rate and affordable housing. A total of 148 affordable housing units, 15% of the overall project units, are included in the total unit count and would not, when combined with market rate units, exceed 990 total residential dwelling units. Affordable units include only units affordable to extremely low, very-low, and low-income households. Moderate rate units, for sale or for rent, may not be counted towards the affordable housing TCSP requirement but will be counted towards meeting the City's Regional Housing Needs Assessment (RHNA) for 2014 to 2021.

Commercial and Mixed Use. The TCSP includes up to 60,000 gross square feet (gsf) of retail, mixed use, and office uses on 8.78 acres (PA 6 and 7). The general commercial would be located in the eastern portion of the TCSP area along Ventura Road. The general commercial would be oriented around a public plaza and would be within walking distance of residential units and readily accessible to a new bus stop on Ventura Road. Typical commercial neighborhood retail and service uses could include a coffee shop, deli or sandwich shop, restaurants, dry cleaner, consumer electronics retail, mailbox/package business, flower shop, hair salon, or copy center. Leasing preferences and incentives may be required so that the commercial provides a mix of uses that reduce vehicle trips by residents.

Business and Research Park. Up to 132,000 gsf of Business and Research Park uses on 9.11 acres (PA 13 and 14) are proposed in the southern portion of the TCSP, fronting Teal Club Road. Typical uses in the BRP zone include professional, administrative and high technology research and manufacturing uses along with limited commercial activities intended to support such



uses. Service uses could include research and development; laboratories; out-patient clinics; printing or photocopying; administrative, financial, or medical offices; restaurants and delicatessens; business furniture and equipment sales; florists; warehousing and distribution; automobile rental agencies; and adult day care facilities. Manufacturing and assembly uses could include electronics, ceramics/glass, light metal consumer goods, plastics and fabrics, and/or electronic instruments. Related uses could include drive-through services; convenience markets and drugstores; on-site alcohol sales; and private emergency medical facilities, among others. These uses would be subject to the City's zoning code and applicable reviews and approvals under existing uniformly applied procedures and regulations.

Parks and Open Space. The TCSP includes a 10-acre public (City) Community Park (PA 8 and PA 9) with playground equipment, picnic tables, restrooms, and backstops and fencing for softball/baseball play and soccer use. An additional 7.38-acre park is proposed in PA 10. Within the residential and commercial PA's there is a 0.38-acre greenbelt. The greenbelt and neighborhood parks combine for a total of 17.76 park and open space acres.

Additional Parcels Proposed for Annexation. The additional nine parcels (11.4 acres combined) to be Annexed south of Teal Club Road are currently characterized by a mix of vacant land and existing small residential and industrial developments. Annexation would result in a more logical City boundary so as not to create an unincorporated "island." These parcels are currently located in a "cut-out" shape that forms an irregular boundary line. Upon annexation, these nine parcels would be zoned Light Manufacturing (M-1) by the City of Oxnard. The purpose and intent of the M-1 Zone district is described in the City Code in Section 16-160 as follows:

"M-1 Light (Light Manufacturing Zone). The purpose of the M-1 Zone is to provide areas for manufacturing and related service uses and activities where the principal activity occurs within a building, but also permits outdoor assembly, fabrication, public services, and storage that conform to the development and performance standards of this chapter, and provide areas suitable for adult businesses. Industrial uses in this zone shall be limited to those that conduct fabrication, assembly, or land processing of materials (including agricultural produce) primarily within a building. The development and performance standards of this chapter limit the creation of smoke, gas, odor, dust, sound, and vibration that might be detrimental to health, safety, and welfare to protect any adjoining uses. Wholesale and retail sales and services related to principal uses are permitted. Limited outdoor storage associated with a primary use may be permitted."

According to the City of Oxnard City Code (OCC), maximum building heights in the M-1 zone are 55 feet (OCC Section 16-231, although airport-related height restrictions may apply, reducing this in practice for the TCSP area and nine additional parcels to be annexed). Also, according to the OCC, the maximum lot coverage is 70% (OCC Section 16-164). The existing residential uses would not be conforming because residential uses are not encouraged by the Oxnard Airport Comprehensive Land Use Plan in this proximity to runways.

Since future development is anticipated at some point, this EIR assumes that the entire area would eventually be developed. Based on the M-1 zone standard of 70% maximum lot coverage and the area of the nine parcels (11.4 acres, or 496,584 square feet), the maximum potential



buildout would be 347,608 square feet. For purposes of this EIR, assumed buildout would be half manufacturing space (173,804 square feet) and half warehouse space (173,804 square feet).

AREAS OF CONTROVERSY KNOWN TO THE LEAD AGENCY

Areas of controversy known to the City of Oxnard include water supply, loss of agricultural resources, safety and noise concerns related to Oxnard Airport, inefficient use of land (i.e., low density, non-compact development), and neighborhood impacts (traffic, noise and air quality). Please see Section 1.0, *Introduction*, for a summary of comments received in response to the Notice of Preparation, and Appendix A to this EIR for the written comments received and transcripts of the public scoping meetings.

ALTERNATIVES

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a reasonable range of alternatives to the proposed project, and identifies the Environmentally Superior Alternative as also required by the *CEQA Guidelines*.

The following alternatives are evaluated in this EIR:

- *Alternative 1: No Project –No Development*
- *Alternative 2: Phase 1 Development Only*
- *Alternative 3: Reduced Intensity*

Among the other alternatives being considered, the Phase 1 Only Development alternative could be considered environmentally superior, as it would reduce impacts in many issue areas, due primarily to the 57-acre reduction in the development area. This alternative would reduce, but not eliminate, the Class I impacts related to Air Quality and Agricultural Resources. This alternative would generally meet the project objectives, although fewer housing units, office uses and public park acreage would be constructed.

SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Table ES-2 includes a brief description of the environmental issues relative to the proposed project, the identified significant environmental impacts, proposed mitigation measures, and residual impacts. Impacts are categorized by classes. Class I impacts are defined as significant, unavoidable adverse impacts which require a statement of overriding considerations to be issued pursuant to the *State CEQA Guidelines* §15093 if the proposed project is approved. Class II impacts are significant adverse impacts that can be feasibly mitigated to less than significant levels and which require findings to be made under Section 15091 of the *State CEQA Guidelines*. Class III impacts are considered less than significant impacts.

Potential impacts that were analyzed in Section 6.0, *Effects Found Not to Be Significant*, and found to be less than significant and/or beneficial are not included in this table.



**Table ES-2
 Summary of Environmental Impacts, Mitigation Measures and Residual Impacts**

Impact	Mitigation Measures	Residual Impact
AESTHETICS		
<p>Impact AES-1 Scenic vistas, including views of the project area, as well as vistas of the mountains to the north and the Santa Monica Mountains to the east, would be partially blocked from certain public roads by buildout of the TCSP area, including five roads identified as view corridors in the City's 2030 General Plan. However, given the limited extent to which the proposed project would affect scenic vistas, required buffers along scenic corridors, and the fact that views of the elements of these vistas, such as distant mountains and nearby agricultural lands, are readily available from nearby areas, this would be a Class III, less than significant, impact.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact AES-2 Scenic resources in the project area consist of farmland and tree windrows along the eastern boundary of the project area. These resources help define the project area's visual character and quality. Implementation of the proposed project would replace these visual resources with urban development. Therefore, the project would both eliminate scenic resources and substantially alter the visual character and quality of the site. However, impacts would be Class II, significant but mitigable.</p>	<p>AES-2 Windrows in Project Landscaping. A windrow shall be created throughout the length of the Beverly Drive greenbelt. In addition, in order to reinforce the project's boundaries, windrows shall be created between the project area and the proposed school project, which abuts the project area, and between the Phase 1 and Phase 2 boundaries. The windrows shall be designed to emulate traditional regional windrows originally planted for farming operations, including spacing of trees and tree species of like stature as determined by the Community Development Director. The windrow plan shall be submitted for review and approval by the Oxnard Planning Department prior to issuance of grading permits or building permits in the TCSP area. The windrows shall be maintained for the life of the project, including necessary irrigation and protection for tree establishment and tree maintenance and replacement to maintain the aesthetic look and tree safety for the life of the project.</p>	<p>Less than significant.</p>
<p>Impact AES-3 The proposed project would result in new sources of light and glare in and around the project area. However, these light and glare sources would be regulated by the Oxnard City Code, and would be consistent with the urbanized nature of the project site's surroundings and the urban land uses envisioned for the site under the City's 2030 General Plan. This is considered a Class III, less than significant, impact.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
AGRICULTURAL RESOURCES		
<p>Impact AG-1 Implementation of the proposed TCSP would result in the conversion of approximately 149.5 acres of “important farmland” with prime soils to non-agricultural uses. This would result in the permanent loss of agricultural lands. Therefore, impacts would be Class I, <i>significant and unavoidable</i>.</p>	<p>AG-1 Agricultural Conservation. The applicant shall implement one of the two options below. The applicant for projects involving the Phase 1 properties shall implement Option 1, the Agricultural Conversion In-Lieu fee. For the applicants for Phase 2 properties, Option 1 is also the preferred option, though the City may review and allow Option 2.</p> <p>Option #1: Agricultural Conversion In-Lieu Fee. Prior to issuance of the first grading permit, the applicant shall have paid an agricultural conservation in-lieu fee to the City of Oxnard. The final fee amount shall be determined by the City of Oxnard at its discretion. The funds shall be used for land acquisition (land or structure), refurbishment and/or construction of farmworker housing units within Oxnard. The use of such funds shall be determined at the discretion of the City Manager, Community Development Director, and Housing Director.</p> <p>Option #2: Purchase of Agricultural Conservation Easements. Prior to recordation of the first final map in the TCSP area, the applicant shall have recorded permanent agricultural conservation easements on at least 50 acres in either the Oxnard Plain area of Ventura County, the Santa Clara River floodplain, or a location otherwise deemed acceptable by the City of Oxnard Community Development Department. Prior to issuance of a building permit for construction of the 500th residential unit, the applicant shall have recorded permanent agricultural conservation easements on at least 100 acres in the Oxnard Plain area of Ventura County, the Santa Clara River floodplain, or a location otherwise deemed acceptable by the City of Oxnard Community Development Department. Prior to issuance of a building permit for construction of the 990th residential unit, the applicant shall have recorded permanent agricultural conservation easements on at least 149.5 acres in the Oxnard Plain area of Ventura County, the Santa Clara River floodplain, or a location otherwise deemed acceptable by the City of Oxnard Community Development Department. All agricultural lands to be preserved via conservation easement shall be of comparable quality to the farmland of statewide importance that would be converted under implementation of the TCSP, containing row crops or tree crops and high soil fertility. Agricultural conservation easements shall perpetually restrict non-farm development and other</p>	<p>Significant and unavoidable.</p>



Impact	Mitigation Measures	Residual Impact
	uses that are inconsistent with commercial agriculture. To the extent feasible, the applicant shall coordinate with and provide funding for qualified land conservation entities (i.e., land trusts) to secure and hold the easements in perpetuity.	
<p>Impact AG-2 Development of non-agricultural uses in the TCSP area could potentially cause compatibility conflicts with on-site and nearby agricultural uses. Impacts would be Class II, <i>significant but mitigable</i>.</p>	<p>AG-2 Interim Agricultural Buffers. TCSP development adjacent to active agricultural operations shall provide fencing and a minimum buffer of 300 feet to the agricultural operations, consistent with the Ventura County Agricultural Commissioner's Agricultural/Urban Buffer Policy (2006). If this distance is not practical due to project design or features, a minimum 150-foot buffer is acceptable if a vegetative screen is provided as specified in the Agricultural/Urban Buffer Policy. Consistent with Mitigation Measure AES-2, vegetative screens shall be windrows designed to emulate traditional regional windrows originally planted for farming operations, including spacing of trees and tree species of like stature as determined by the Community Development Director.</p>	<p>Less than significant.</p>
<p>A number of regulatory mechanisms are in place to minimize the conversion of agricultural land to nonagricultural use outside of the CURB, including the County SOAR ordinances, City CURB, and greenbelt agreements between Camarillo and Oxnard and between the City of Oxnard and City of Ventura. Nevertheless, planned development of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland within the CURB line would result in cumulatively significant agricultural resource impacts, as the conversion of such land to non-agricultural uses cannot be fully mitigated. The cumulative impact to agricultural would be significant and the project's contribution would be cumulatively considerable.</p>	<p>No additional mitigation beyond project-specific mitigation measure AG-1 is available.</p>	<p>Significant and unavoidable.</p>
AIR QUALITY		
<p>Impact AQ-1 Project construction would generate temporary air pollutant emissions of ozone precursors ROG and NO_x, as well as fugitive dust (PM₁₀ and PM_{2.5}). VCAPCD recommends that lead agencies include mitigation measures to reduce construction emissions; therefore, temporary construction-related air quality impacts would be Class II, <i>significant but mitigable</i>.</p>	<p>AQ-1(a) Dust Control Measures. The following shall be implemented during grading and construction to control dust.</p> <ol style="list-style-type: none"> 1. <i>The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.</i> 2. <i>Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavating activities. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.</i> 3. <i>Fugitive dust produced during grading, excavation, and construction activities</i> 	<p>Less than significant.</p>



Impact	Mitigation Measures	Residual Impact
	<p><i>shall be controlled by the following activities:</i></p> <ul style="list-style-type: none"> <i>a. All trucks shall be required to cover their loads as required by California Vehicle Code Section 23114.</i> <i>b. All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.</i> <ol style="list-style-type: none"> <i>4. Graded and/or excavated inactive areas of the construction site shall be monitored at least weekly for dust stabilization. Soil stabilization methods shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area within three weeks, it shall be seeded and watered until grass growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.</i> <i>5. Signs shall be posted on-site limiting traffic to 15 miles per hour or less.</i> <i>6. During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to affect adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust from being an annoyance or hazard, either off-site or on-site.</i> <i>7. Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.</i> <i>8. Personnel involved in grading operations, including contractors and subcontractors, shall wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.</i> <i>9. Shaker plates shall be installed at all truck exits from the site.</i> <i>10. Dust control requirements shall be shown on all grading plans.</i> <i>11. Signs displaying the APCD Complaint</i> 	



Impact	Mitigation Measures	Residual Impact
	<p><i>Line Telephone number for public complaints shall be posted in a prominent location visible off the site: (805) 645-1400 during business hours and (805) 654-2797 after hours.</i></p> <p>AQ-1(b) Construction Equipment Controls. The following shall be implemented during construction to minimize emissions of ozone precursors.</p> <ol style="list-style-type: none"> 1. <i>Construction contractors shall minimize equipment idling time throughout construction. Engines shall be turned off if idling would be for more than five minutes.</i> 2. <i>Equipment engines shall be maintained in good condition and in proper tune as per manufacturers' specifications.</i> 3. <i>The number of pieces of equipment operating simultaneously shall be minimized.</i> 4. <i>Construction contractors shall use alternatively fueled construction equipment (such as compressed natural gas, liquefied natural gas, or electric) when feasible.</i> 5. <i>The engine size of construction equipment shall be the minimum practical size.</i> 6. <i>Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated clean diesel engines) shall be utilized wherever feasible.</i> 7. <i>During the smog season (May through October), the construction period should be lengthened so as to minimize the number of vehicles and equipment operating at the same time.</i> <p>AQ-1(c) Low Volatile Paints. Low volatile interior and exterior paints shall be used for architectural coatings wherever painted surfaces are proposed.</p>	
<p>Impact AQ-2 Operational emissions of ROG and NO_x would exceed VCAPCD's daily thresholds. While the impacts of vehicle emissions and related impacts are mitigable with payment of Transportation Demand Management (TDM) fees, not all operational emissions are mitigable. Therefore, the project would have a Class I, <i>significant and unavoidable</i>, impact to regional air quality.</p>	<p>AQ-2(a) TDM Fees. The TCSP project developer shall provide payment of fees to a suitable Transportation Demand Management Plan Fund. The fees will be based on the exceedance of the threshold for ROG and NO_x that is attributable to mobile emissions for Phase 1 and Phase 2. The fees shall be based on the unit cost for ROG and NO_x, in effect at the time the fee is to be paid using the VCAPCD guidelines formula of:</p> <ul style="list-style-type: none"> • <i>(excess emissions lbs/day) x (unit cost ROG) x (days in operation) x (3 years) = Total cost</i> • <i>(excess emissions lbs/day) x (unit cost NO_x) x (days in operation) x (3 years) = Total cost</i> 	<p>Significant and unavoidable.</p>



Impact	Mitigation Measures	Residual Impact
	<p>Payment of Phase 1 fees is required prior to issuance of the first certificate of occupancy for Phase 1. Payment of Phase 2 fees is required prior to issuance of the first certificate of occupancy for Phase 2. Payment of fees associated with the additional Annexation area is required for future developers prior to issuance of certificate of occupancy.</p> <p>AQ-2(b) Increased Efficiency. Applicants for all projects in the TCSP area and in the nine parcels south of Teal Club Road proposed for Annexation shall include in construction and building management contracts the following energy saving requirements, or measures shown to be equally effective:</p> <ul style="list-style-type: none"> ● <i>Residential and commercial land use shall increase efficiency 15% beyond Title 24 to achieve a Tier 1 “green building” designation within the California Green Building Code, or equivalent as determined by the Community Development Director.</i> ● <i>Use of solar or low-emission water heaters in new buildings.</i> ● <i>Require that commercial landscapers providing services at the common areas of the TCSP area use electric or battery-powered equipment, or other internal combustion equipment that is either certified by the California Air Resources Board or is three years old or less at the time of use, to the extent that such equipment is reasonably available and competitively priced in Ventura County (meaning that the equipment can be easily purchased in stores in Ventura County and the cost of the equipment is not more than 20% greater than the cost of standard equipment).</i> <p>Applicants for all projects in the TCSP area shall provide documentation of energy savings associated with materials proposed for use at time of building permit application.</p> <p>AQ-2(c) Passive Energy Conservation Design. Applicants for all projects in the TCSP area and the nine parcels south of Teal Club Road proposed for Annexation shall include passive energy conservation design elements, including building material massing, orientation, architectural elements (deeply recessed windows, eave overhangs, etc.), landscape shading, recycled or low-impact materials, window glazing to increase insulation, and water circulation pumps to reduce water use, and/or similar measures shown to be equally effective.</p> <p>Applicants for all projects in the TCSP area</p>	



Impact	Mitigation Measures	Residual Impact
	<p>and the nine parcels south of Teal Club Road proposed for Annexation shall provide documentation of energy savings associated with materials and methods proposed for use at time of building permit application. These documents shall be reviewed by City staff for achievement of adequate energy conservation.</p> <p>AQ-2(d) Natural Ventilation. Applicants for all projects in the TCSP area and the nine parcels south of Teal Club Road proposed for Annexation shall include natural ventilation in building design plans.</p>	
<p>Impact AQ-3 The proposed project would not create carbon monoxide concentrations exceeding state or federal standards. Localized air quality impacts would therefore be Class III, <i>less than significant</i>.</p>	None required.	Less than significant without mitigation.
<p>Impact AQ-4 The proposed project would not generate population growth beyond AQMP forecasts. It would not inhibit the City's ability to meet the goals of its EAP with implementation of energy efficiency measures described in Impact AQ-2. Impacts relating to AQMP and EAP consistency are therefore considered Class II, <i>significant but mitigable</i>.</p>	AQ-2(b-d) above under Impact AQ-2.	Less than significant.
<p>Impact AQ-5The project would not create objectionable odors that would affect neighboring properties. Impacts related to odors would be Class III, less than significant.</p>	None required.	Less than significant without mitigation.
<p>As discussed in Impact AQ-2, operational emissions associated with full buildout of the proposed project would exceed VCAPCD thresholds for ROG and NOX. Therefore, the emissions generated by the proposed project would be cumulatively considerable regarding a substantial contribution to an existing or projected air quality violation.</p>	None available beyond project-specific mitigation measures already required.	Significant and unavoidable.
BIOLOGICAL RESOURCES		
<p>Impact BIO-1 In the TCSP area, the additional Annexation area, and where Teal Club Road and Patterson Road would be widened, construction during the bird nesting season could directly or indirectly affect nesting birds protected under the Migratory Bird Treaty Act and the CFGC 3503. This would be a Class II, <i>significant but mitigable</i>, impact.</p>	<p>BIO-1(a) Nesting Bird Survey. If tree removal is to occur during the bird breeding season (February 15 through September 15), at a minimum one (1) survey shall be conducted prior to tree removal by a City-approved qualified biologist (a person with a biology degree and/or established skills in bird recognition). The survey shall occur no more than one (1) week prior to tree removal. The work limits plus a 250-foot buffer, as feasible, shall be surveyed to accommodate potential active raptor nests, as well as other birds nesting nearby. A copy of the biologist contract for these services shall be submitted to the Planning Department for review and approval prior to issuance of grading permits. A preconstruction meeting shall occur prior to tree removal and shall include the project proponent or designee, the construction</p>	Less than significant.



Impact	Mitigation Measures	Residual Impact
	<p>foreman, City staff, and the City-approved biologist. A report summarizing the findings of the survey and the recommended buffers shall be provided to the Community Development Department prior to vegetation removal activities and vegetation removal and grading activities shall not commence until the Community Development Department provides an authorization to proceed directive. Work may be redirected to other areas by the Community Development Director as recommended by the biologist.</p> <p>BIO-1(b) Establishment of Appropriate Buffers. In the event that nesting birds are observed within 250 feet of the disturbance/construction area, species-specific exclusionary buffers shall be determined by the qualified biologist, and construction timing and location shall be adjusted accordingly until the nestlings have fledged and are no longer dependent upon the nest. The active nests and exclusionary buffers shall be monitored by a qualified biologist (at least initially) to determine if the active nests are being adversely affected by construction activities and to determine if a buffer would need to be increased to reduce such effects.</p>	
<p>Impact BIO-2 California horned lark and monarch butterflies, both locally sensitive animal species, were not observed in the project area during surveys, but may occur within 5 miles of the project area. If present during construction, individuals could potentially be adversely affected. This would be a Class II, <i>significant but mitigable</i>, impact.</p>	<p>BIO-1(a-b) above under Impact BIO-1.</p> <p>BIO-2(a) Monarch Butterfly Survey. If tree removal occurs during the aggregation season (September through December), a qualified biologist (a person with a biology degree and/or established experience with butterflies) shall determine the presence/absence of monarch butterfly activity in the project area. At a minimum, one survey shall be performed no more than one week prior to initial tree removal. A copy of the biologist contract for these services shall be submitted to the Community Development Department for review and approval prior to issuance of grading permits. A report summarizing the findings of the survey and the recommendations shall be provided to the Community Development Department prior to tree trimming/removal activities and grading activities shall not commence until the Community Development Department provides an authorization to proceed directive. A preconstruction meeting shall occur prior to tree removal and shall include the project proponent or designee, the construction foreman, City staff, and the City-approved biologist. Work may be redirected to other areas by the Community Development Director as recommended by the biologist.</p>	<p>Less than significant.</p>



Impact	Mitigation Measures	Residual Impact
	<p>BIO 2(b) Establishment of Appropriate Buffers. If temporary aggregation activity is observed, a 100-foot buffer shall be established until after the aggregation season or until the monarchs have left the project area.</p>	
<p>Impact BIO-3 Irrigation ditches are present in the project area and along Teal Club Road west of Patterson Road. However, these do not appear to be jurisdictional and do not contain riparian habitat or sensitive species. Impacts to jurisdictional areas would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
CULTURAL RESOURCES		
<p>Extensive ground disturbance that has occurred on the project area during past development and agricultural activities, as well as the lack of natural surface water features, reduces the likelihood that intact prehistoric cultural or tribal cultural resources are present, and the possibility of encountering previously undisturbed cultural resources during project construction would be remote. This would be a less than significant impact; however, mitigation measures CR-1(a) through CR-1(c) are recommended in order to minimize impacts to cultural resources, and mitigation measure CR-1(d) is recommended in order to minimize impacts to tribal cultural resources (see Section 6.0, <i>Effects Found Not to be Significant</i>).</p>	<p>Impacts would be less than significant without mitigation. However, the following mitigation measures are recommended in order to minimize impacts to cultural resources.</p> <p>CR-1(a) Native American Monitoring. Developer shall contract with a Native American monitor to be present during all subsurface grading, trenching or construction activities on the project area. The monitor shall provide a monthly report to the Planning Division summarizing their activities during the reporting period. Monitoring may be reduced or halted at the discretion of the monitors as warranted by conditions such as encountering bedrock, sediments being excavated are fill, soils occur within formations unlikely to yield cultural resources (e.g., soils formations predating human occupation of the region), or negative findings during the first 30 percent of rough grading. If monitoring is reduced to spot-checking, spot-checking shall occur when ground-disturbance moves to a new location in the project site and when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock). A copy of the contract for these services shall be submitted to the Planning Manager for review and approval prior to grading activities on site. The monitoring report(s) shall be provided to the Planning Division prior to approval of final building permits.</p> <p>CR-1(b) Procedures for Discovery of Intact Cultural Resources. In the event that archaeological resources are unearthed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (NPS 1983) has evaluated the nature and significance of the find. If necessary, the evaluation may require</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
	<p>preparation of a treatment plan and testing for the California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work, such as data recovery excavation, may be required to mitigate any significant impacts to historical resources. After the find has been appropriately mitigated, work in the area may resume. A Chumash representative shall monitor any mitigation work associated with Native American cultural material.</p> <p>CR-1(c) Procedures for Discovery of Human Remains. If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the California Native American Heritage Commission.</p> <p>CR-1(d) Unanticipated Discovery of Tribal Cultural Resources. In the event that cultural resources of Native American origin are identified during construction, all earth-disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archeologist and the appropriate Native American tribal representative.</p>	
GEOLOGY AND SOILS		
<p>Impact GEO-1 Seismically-induced ground failure or ground shaking could result in the exposure of people and structures to the risk of loss, injury, or death. However, mandatory compliance with applicable City of Oxnard and California Building Code or California Residential Code requirements would reduce impacts to a Class III, <i>less than significant</i>, level.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
<p>Impact GEO-2 The TCSP area and additional Annexation area is in a State designated Liquefaction Hazard Zone. In addition, near-surface alluvial soils in the project area are not considered suitable to support structures and expansive soils may be present. However, geotechnical engineering solutions are available to remediate these issues and development of the residential and other uses envisioned in the TCSP and additional Annexation area would be feasible from a geotechnical perspective. Mitigation Measure GEO-2 would reduce impacts to a Class II, <i>significant but mitigable</i>, level.</p>	<p>GEO-2 Geotechnical Recommendations. All recommendations contained in the TCSP geological “due diligence” investigation conducted by Geolabs in 2004 (Appendix D of this EIR) shall be followed for future development proposals in the TCSP area and the annexation area south of Teal Club Road. These recommendations include the following, unless superseded by a project-specific geotechnical report reviewed and approved by the City’s Building and Engineering Services Division:</p> <ul style="list-style-type: none"> ● <i>A uniform blanket of compacted fill shall be created for support of structural footings in the alluvial area.</i> ● <i>Areas that are to be paved shall be scarified to at least 12 inches below existing or rough grade (whichever is deeper), brought to near material’s optimum moisture content, and compacted to appropriate relative compaction.</i> ● <i>Areas with disturbed materials and areas to support structures shall be improved by over excavating the unsuitable materials and replacing them with engineered fill.</i> ● <i>Any import materials that are to be used as structural fill shall be approved by a qualified geotechnical engineer prior to placement.</i> ● <i>Compressible soils that lie within areas to receive engineered fill shall be removed to relatively incompressible material, moisture conditioned, and replaced as properly compacted fill.</i> ● <i>Conduct laboratory testing to verify the expansive properties of the near-pad-grade materials shall be performed at the completion of rough grading.</i> ● <i>Supplemental subsurface investigations shall be performed for each specific development project within the project area to more thoroughly evaluate the materials within the site and update/augment the measures listed above as appropriate. These reports shall be submitted for City review and approval prior to issuance of grading or building permits within the project area. All recommendations of the supplemental investigations shall be incorporated into approved grading and construction plans.</i> 	<p>Less than significant.</p>



Impact	Mitigation Measures	Residual Impact
GREENHOUSE GAS EMISSIONS		
<p>Impact GHG-1 Development of the proposed TCSP and buildout of the additional Annexation parcels under the proposed zoning would generate additional GHG emissions beyond existing conditions. However, these emissions would be below the per capita emissions threshold for 2030 identified in the State Scoping Plan Impacts would therefore be Class III, <i>less than significant</i>.</p>	None required.	Less than significant without mitigation.
<p>Impact GHG-2 With adherence to the mitigation measures included in this EIR, the proposed TCSP and buildout of the additional Annexation parcels with industrial land uses would be consistent with the statewide goals for GHG emissions reduction, as embodied in AB 32, SB 32, and SB 375, as well as the Southern California Association of Governments (SCAG) Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), the 2017 State Scoping Plan, the City of Oxnard Sustainable Community Element, and the City of Oxnard Energy Action Plan. Impacts would therefore be Class III, <i>less than significant</i>.</p>	None required.	Less than significant without mitigation.
HAZARDS AND HAZARDOUS MATERIALS		
<p>Impact HAZ-1 Buildout of the TCSP area and additional Annexation area would include development of residential, commercial, and light industrial land uses that could involve the use, storage, disposal or transportation of hazardous materials. However, required adherence to existing regulations would help to ensure that this is a Class III, <i>less than significant</i> impact.</p>	None required.	Less than significant without mitigation.
<p>Impact HAZ-2 Development of the TCSP and additional parcels to be Annexed would require the demolition of structures that could contain asbestos or lead based paints. Demolition of these buildings, if these materials are present, could potentially expose workers to hazards that would adversely affect human health and safety. Also, buried asbestos-cement (“transite”) water pipes contain asbestos. However, compliance with both locally adopted Ventura County Air Pollution Control District (VCAPCD) and State regulations regarding the handling and disposal of these materials would reduce these potential impacts to Class II, <i>significant but mitigable</i>.</p>	<p>HAZ-2(a) Asbestos and Lead Based Paint Surveys. Prior to issuance of a demolition permit for any structure in the project area constructed prior to 1978, a lead-based paint and asbestos survey shall be performed by a qualified and appropriately licensed professional and submitted to the City. All testing procedures shall follow recognized local standards as well as established California and Federal assessment protocols. The lead-based paint and asbestos survey report shall quantify the areas of lead-based paint and asbestos containing materials.</p> <p>HAZ-2(b) Asbestos Abatement. Prior to any demolition or renovation, project area structures found to contain asbestos must have the asbestos containing material removed according to proper abatement procedures recommended by the asbestos consultant and as required by the VCAPCD. All abatement activities shall be in</p>	Less than significant.



Impact	Mitigation Measures	Residual Impact
	<p>compliance with California and Federal OSHA, and with the VCAPCD requirements. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement. All asbestos containing material removed from project area structures shall be hauled and disposed of by a transportation company licensed to handle asbestos-containing materials and disposed of at a licensed receiving facility and under proper manifest. Following completion of the asbestos abatement, the asbestos consultant shall provide a report documenting the abatement procedures used, the volume of asbestos containing material removed, where the material was disposed. This report shall include transportation and disposal manifests or dump tickets. The abatement report shall be prepared for the property owner or other responsible party, with a copy submitted to the VCAPCD and the City of Oxnard.</p> <p>HAZ-2(c) Lead Based Paint Removal. Prior to the issuance of a permit for the renovation or demolition of any structure in the project area, a licensed lead-based paint professional shall be contracted to evaluate the structure for lead-based paint. If lead-based paint is discovered, it shall be removed according to proper abatement procedures recommended by the consultant and in accordance with VCAPCD, State of California and Federal requirements. Only lead-based paint trained and certified abatement personnel shall be allowed to perform abatement activities. All lead-based paint removed from these structures shall be hauled and disposed of by a transportation company licensed to transport this type of material. In addition, the material shall be taken to a landfill or receiving facility licensed to accept the waste. Following completion of the lead based paint abatement, the lead based paint consultant shall provide a report documenting the abatement procedures used, the volume of lead based paint removed, where the material was moved to, and include transportation and disposal manifests or dump tickets. The abatement report shall be prepared for the property owner or other responsible party, with a copy submitted to the VCAPCD and the City of Oxnard.</p>	



Impact	Mitigation Measures	Residual Impact
<p>Impact HAZ-3 The proposed TCSP area is currently used for agriculture. Residual levels of chlorinated pesticides were found in the soil. Chemicals could be released during grading activities for development under the proposed TCSP, exposing construction workers and nearby receptors to contaminated soils. However, with adherence to existing regulations pertaining to the remediation of such soils, impacts would be Class II, <i>significant but mitigable</i>.</p>	<p>HAZ-3 Remediation. The following recommendations contained in the Phase I ESA shall be implemented during construction of projects within the TCSP area:</p> <ul style="list-style-type: none"> • <i>The upper agricultural disturbed soil (approximately upper 1 to 1.5 feet below surface level, to be determined by Building and Engineering Services), shall be removed and the site shall be recompacted.</i> • <i>Monitoring of residual levels of pesticides shall be confirmed both during and following completion of the grading activities to be sure residual levels are below action levels. California Environmental Protection Agency (Cal EPA) California Human Health Screening Levels (CHHSLs) shall be used to set appropriate residual levels for organochlorine pesticide contamination found.</i> • <i>If residual organochlorine pesticide contamination is found at levels exceeding CHHSLs set by Cal EPA, a Soil Management Plan, Removal Action Plan or equivalent document must be prepared by a qualified hazardous materials consultant. The plan must establish remedial measures and/ or soil management practices to ensure construction worker safety and the health of future workers, residents, and visitors. The Plan shall be submitted to the hazardous materials response team in the Oxnard Fire Department for review and approval.</i> 	<p>Less than significant.</p>
<p>Impact HAZ-4 The property at 1618 Doris Avenue in the TCSP area, which is also within ¼-mile of the proposed OSD school site, is listed as a facility that generated and stored hazardous waste materials and is listed on the CORTESE list and the Leaking Underground Storage Tank (LUST) database. However, the LUST has been removed and contaminated soil has been excavated and remediated. Therefore, the impact from the LUST would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact HAZ-5 The proposed TCSP area and additional annexation area are both within the Oxnard Airport’s traffic pattern zone (TPZ) and are subject to height restrictions. Structures in these areas may be considered obstructions to air travel. Impacts related to airport safety clearance are Class II, <i>significant but mitigable</i>.</p>	<p>HAZ-5(a) FAA Notification. For all development in the TCSP area and the additional annexation area, the applicant shall notify the FAA via online application at FAA’s https://oeaaa.faa.gov/oeaaa/external/portal.jsp website. The FAA will determine if the structure is an “obstruction” or “hazard” to aviation, and if so, will make recommendations to reduce the obstruction or hazard. Prior to issuance of building</p>	<p>Less than significant.</p>



Impact	Mitigation Measures	Residual Impact
	<p>permits, the applicant shall forward the FAA determination and recommendations to the City of Oxnard and the City shall require that the applicant implement the recommendations provided by the FAA. Recommendations may include the use of red obstruction lighting on new construction.</p> <p>HAZ-5(b) Structural Coverage in the TCSP Area. Structures within the TCSP area shall conform to the following guidelines:</p> <ul style="list-style-type: none"> • Residential uses: Maximum structural coverage of the residential planning areas must be no more than 25%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts • Commercial uses: Maximum structural coverage of the commercial planning areas must not exceed 50%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts. <p>HAZ-5(c) Structural Coverage in the Additional Annexation Area. Structures within the additional annexation area shall conform to the following guidelines:</p> <ul style="list-style-type: none"> • Commercial and industrial uses: Maximum structural coverage must not exceed 50%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts. Where development is proposed immediately adjacent to the airport property, site plans shall be designed to locate structures as far as practical from the runway. 	
<p>Impact HAZ-6 Development of the proposed project would place residential, commercial, and manufacturing uses within 2,000 feet of the Oxnard Airport runway, potentially exposing people residing and working in the area to safety hazards. However, the probability of an accident occurring in the project area is low. Further, the presence of nearby emergency landing areas would reduce accident hazards. Therefore, impacts related to airport safety hazards would be Class III, less than significant.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
<p>Impact HAZ-7 Development of the proposed TCSP would place manufacturing uses within 0.25 mile of a planned school site owned by Oxnard School District, potentially emitting hazardous emissions within one-quarter mile of a proposed school. However, compliance with existing regulatory requirements would minimize risks to schools and students, resulting in a less than significant impact. This is a Class III, <i>less than significant</i>, impact.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
HYDROLOGY AND WATER QUALITY		
<p>Impact HWQ-1 Construction activities that would occur in the project area through TCSP implementation and annexation of the additional parcels south of Teal Club Road would have the potential to increase erosion and sedimentation. If uncontrolled, this could adversely impact surface water and ground water quality or cause flooding. However, compliance with the NPDES Construction General Permit requirements would reduce temporary construction related water quality and flooding impacts to a Class III, <i>less than significant</i>, level.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact HWQ-2 Development in the project area would increase impervious surfaces, resulting in increased surface water pollutants. However, implementation of proposed stormwater detention in accordance with NPDES MS4 requirements would reduce the potential for runoff to contain pollutants during operation of the project. This would be a Class III, <i>less than significant</i>, impact.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact HWQ-3 Development in the project area would increase impervious surfaces, resulting in increased peak stormwater runoff flows, which could lead to flooding. However, implementation of proposed stormwater detention, storm drain improvements and infrastructure would maintain pre-development stormwater discharge rates, consistent with County requirements. Impacts would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact HWQ-4 During excavation and grading in the project area, groundwater could be encountered on individual development sites. This may require temporary dewatering. However, impacts would be Class II, <i>significant but mitigable</i>.</p>	<p>HWQ-4 Dewatering Program. Prior to the issuance of any grading permits in the project area, a qualified engineer, hydrologist or hydrogeologist shall estimate from the final engineering plans the volume of dewatering necessary for development within the project area. If dewatering is required, a dewatering program shall be designed to properly convey and treat dewatering discharge in accordance with the NPDES permits, as well as state and local regulations. The program shall be subject to the approval of the City of Oxnard Public Works Department. The program shall include development site design methods for treatment and conveyance of temporary and,</p>	<p>Less than significant.</p>



Impact	Mitigation Measures	Residual Impact
	if required, permanent dewatering discharge, including infiltration ponds, vegetated swales, and/or reuse for landscape irrigation. Prior to implementation of a dewatering program, groundwater sampling shall be performed to ensure that the system is adequately designed and permitted to address project area groundwater conditions. Groundwater samples shall be analyzed for chemicals related to agricultural operations (i.e., pesticides and arsenic), petroleum hydrocarbons, and volatile organic compounds (VOCs).	
Impact HWQ-5 Buildout of the proposed TCSP and Annexation of the additional nine parcels on the south side of Teal Club Road would increase impervious surfaces in the project area, which could affect the location and amount of infiltration and thus interfere with groundwater recharge. However, based on the proposed hydrologic conditions in the project area, impacts would be Class III, <i>less than significant</i> .	None required.	Less than significant without mitigation.
Impact HWQ-6 The City of Oxnard is located in a Dam Inundation Zone, or Dam Failure Hazard Zone. However, the potential for a dam failure is considered low. Impacts would be Class III, <i>less than significant</i> .	None required.	Less than significant without mitigation.
LAND USE AND PLANNING		
Impact LU-1 The proposed project would not physically divide an established community. This is a Class III, less than significant, impact.	None required.	Less than significant without mitigation.
Impact LU-2 The proposed project is potentially inconsistent with applicable land use plans, policies and regulations. This is a Class II, significant but mitigable impact.	Mitigation measures included in Sections 4.1, <i>Aesthetics</i> , 4.2, <i>Agricultural Resources</i> , 4.3, <i>Air Quality</i> , 4.5, <i>Geology and Soils</i> , 4.7, <i>Hazards and Hazardous Materials</i> , and 4.13, <i>Transportation and Traffic</i> would reduce environmental impacts to help achieve consistency with adopted goals and policies.	Less than significant.
Impact LU-3 The proposed project would be generally consistent with land uses allowed under the airport land use plan for the Oxnard Airport; however, existing structures, trees and lighting on the nine parcels in the additional Annexation area constitute an obstruction to airport operations. This is considered a Class II, <i>significant but mitigable</i> , impact.	LU-3(a) FAA Notification. For all development in the TCSP area and the additional Annexation area, the applicant shall notify the FAA via online application at FAA's https://oeaaa.faa.gov/oeaaa/external/portal.jsp website. The FAA will determine if the structure is an "obstruction" or "hazard" to aviation, and if so, will make recommendations to reduce the obstruction or hazard. Prior to issuance of building permits, the applicant shall forward the FAA determination and recommendations to the City of Oxnard and the City shall require that the applicant implement the recommendations provided by the FAA. Recommendations may include the use of red obstruction lighting on new construction.	Less than significant.



Impact	Mitigation Measures	Residual Impact
	<p>LU-3(b) Structural Coverage in the TCSP Area. Structures within the TCSP area shall conform to the following guidelines:</p> <ul style="list-style-type: none"> Residential uses: Maximum structural coverage of the residential planning areas must be no more than 25%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts Commercial uses: Maximum structural coverage of the commercial planning areas must not exceed 50%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts. <p>LU-3(c) Structural Coverage in the Additional Annexation Area. Structures within the additional Annexation area shall conform to the following guidelines:</p> <ul style="list-style-type: none"> Commercial and industrial uses: Maximum structural coverage must not exceed 50%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts. Where development is proposed immediately adjacent to the airport property, site plans shall be designed to locate structures as far as practical from the runway. <p>LU-3(d) Avigation Easement. Prior to issuance of final tract maps for development pursuant to the proposed Specific Plan or rezone of additional Annexation areas, the project applicant shall grant an avigation easement to the County of Ventura to record that the property owner(s) acknowledge that their properties are in an area subject to frequent aircraft overflights and that such overflights may result in noise, exhaust emissions and vibrations.</p>	
NOISE		
<p>Impact N-1 Construction-related activities associated with potential buildout of the project area would intermittently generate high noise levels and groundborne vibration within and adjacent to the project area. This may affect existing and future receptors in or near the project area. However, construction noise would be temporary and subject to the requirements of City Code Article XI Sound Regulation, which would ensure that this impact would remain Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
<p>Impact N-2 Project area operations would generate noise that may periodically be audible to existing land uses near and in the project area. However, operational noise would not exceed City noise standards. This is a Class III, <i>less than significant</i> impact.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact N-3 Traffic generated by development under the proposed project would incrementally increase traffic-related noise in the vicinity of the project area. However, because increases in noise would not exceed significance thresholds on any study area road segment, this impact would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact N-4 Future residences in the TCSP area would be exposed to ambient traffic noise levels that may exceed City standards. Through the plan check review process for new developments, the City would ensure acceptable noise levels at residences. Furthermore, the exposure of new sensitive receptors to noise would be an effect of the environment on the project, which is not a significant impact under CEQA. Therefore, this would be a Class III, <i>less than significant</i> impact.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact N-5 Aircraft associated with the Oxnard Airport would periodically generate noise that may be audible to future land uses within the project area. However, aircraft noise in the project area would not exceed City noise standards. Furthermore, the exposure of new sensitive receptors to noise would be an effect of the environment on the project, which is not a significant impact under CEQA. This is a Class III, <i>less than significant</i> impact.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
POPULATION, EDUCATION, AND HOUSING		
<p>Impact PEH-1 The proposed project would add 982 residential units and an estimated 2,651 employees and 3,909 residents to the project area. However, because these increases are within Oxnard 2030 General Plan and SCAG projections for the City, impacts related to housing and population growth would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact PEH-2 The proposed project would involve demolition of up to eight on-site single-family residential units that are not considered “affordable” units, which would displace approximately eight occupied housing units and the on-site population and reduce the City’s housing stock. The proposed project would involve the development of up to 990 housing units, with at least 15%, or 148, of those housing units reserved as “affordable.” This would be</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
<p>required to meet the City's very low- and low-income price restrictions. Therefore, impacts related to the displacement of housing and population would be Class III, <i>less than significant</i>.</p>		
<p>Impact PEH-3 The proposed project would generate an estimated 491 K-8th Grade school-age students and 166 9-12th Grade school-age students. This could adversely affect school facilities in the Oxnard School District and Oxnard Union High School District. However, with payment of required school impact fees, impacts would be reduced to a Class III, <i>less than significant</i>, level.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
PUBLIC SERVICES AND RECREATION		
<p>Impact PS-1 The proposed project would incrementally increase demands on the Oxnard Fire Department. This increase would affect the personnel, equipment, and the organization of the Fire Department. This would be a Class II, <i>significant but mitigable</i>, impact.</p>	<p>PS-1 New Fire Equipment and Staffing. The developer shall provide sufficient proportional funding for development of an additional fire station, fire engine, and staff to provide fire/emergency services to the project area. The City of Oxnard shall create a Community Facilities (Mello Roos) District within the project area to offset proportional associated staffing costs. Mitigation shall be in place and operational prior to occupancy to be determined by the Oxnard Fire Department.</p>	<p>Less than significant.</p>
<p>Impact PS-2The proposed project would incrementally increase demands on the Oxnard Police Department, which could adversely affect the Police Department. This would be a Class II, <i>significant but mitigable</i> impact.</p>	<p>PS-2(a) Oxnard Police Department Consultation. Prior to approval of individual Development Design Review permits, the developer shall work closely with the Oxnard Police Department prior to the final design of the project to ensure the development of adequate security measures for the construction and occupancy stages of development. Such measures shall include, but are not limited to the following:</p> <ul style="list-style-type: none"> • Compliance with Oxnard Police Department recommendations relative to building design, site design, visibility, access, graffiti control, landscaping, security lighting, doors, locks and other relevant factors in the preparation of the final plans. • The Oxnard Police Department shall be included in the plan check process to enable the Department to recommend specific improvements that will enhance crime prevention for the project and allow for the police to better plan for calls that may be generated by the development. • Implement fencing and security measures during the construction phase. The City of Oxnard Police Department shall approve security measures 	<p>Less than significant.</p>



Impact	Mitigation Measures	Residual Impact
	<p>PS-2(b) New Police Staffing. The developer shall provide sufficient proportional funding for development of additional police staffing to provide police protection services to the project area. The City of Oxnard shall create a Community Facilities (Mello Roos) District within the project area to offset proportional associated staffing costs. Mitigation shall be in place and operational prior to occupancy to be determined by the Oxnard Police Department.</p>	
<p>Impact PS-3 The proposed project would both incrementally increase demand for, and incrementally increase demands on, local recreational facilities. The proposed project includes 17.8 acres of parks and open space that would more than satisfy the additional park demand generated by future TCSP residents. This impact would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact PS-4 The proposed project would incrementally increase the demand for library services but would not cause substantial physical deterioration of such facilities. This impact would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
TRANSPORTATION/TRAFFIC		
<p>Impact T-1 The proposed TCSP includes road widening improvements on Ventura Road, Patterson Road, Doris Avenue, and Teal Club Road to accommodate traffic associated with the Specific Plan. With the proposed roadway improvements, impacts would be Class III, <i>less than significant</i>.</p>	<p>Impacts would be less than significant without mitigation. However, the following mitigation measures are recommended in order to minimize impacts to proposed roadway widening.</p> <p>T-1(a) Ventura Road between Doris Avenue and Teal Club Road. The project developer shall construct the widening of this roadway segment to primary arterial (six lane) standards. Construction shall be completed prior to occupancy clearance for any portion of Phase 1 development.</p> <p>T-1(b) Doris Avenue between the Plan Area Boundary and Ventura Road. The project developer shall construct the widening of this roadway segment to full local arterial (four lane) standards. Construction shall be completed prior to occupancy clearance for any portion of Phase 1 development.</p> <p>T-1(c) Teal Club Road between Ventura Avenue and Coronado Road. The project developer shall construction the widening of this roadway segment to full local arterial (four lane) standards. Construction shall be completed prior to occupancy clearance for any portion of Phase 1 development.</p> <p>T-1(d) Patterson Road between the Plan Area Boundary and Teal Club Road. The project developer shall implement</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
	<p>improvements at this location of the widening of this roadway segment to local arterial (two lane) standards. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.</p> <p>T-1(e) Teal Club Road between Coronado Road and Patterson Road. The project developer shall implement improvements at this location of the widening of this roadway segment to local arterial (four lane) standards. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.</p> <p>T-1(f) Doris Avenue between Patterson Road and Victoria Avenue. The project developer shall install safety measures as determined by the City’s Traffic Engineer to address the open ditch on the north side of the roadway.</p> <p>T-1(g) Teal Club Road between Patterson Road and Victoria Avenue. The project developer shall install safety measures as determined by the City’s Traffic Engineer to address the open ditch on the north side of the roadway.</p>	
<p>Impact T-2 Traffic generated by the proposed TCSP when added to existing conditions would result in levels of service that exceed City thresholds at two intersections and would warrant signalization of two intersections. Mitigation is recommended to address this impact; however, automobile delay is no longer considered a significant impact in CEQA analysis. Impacts would be Class III, <i>less than significant</i>.</p>	<p>Impacts would be less than significant without mitigation. However, the following mitigation measures are recommended in order to minimize impacts to applicable intersections to the extent feasible.</p> <p>T-2(a) Victoria Avenue and Teal Club Road. The project developer shall be responsible for signalization of the intersection. Signalization shall occur prior to occupancy clearance for any portion of Phase 1 development.</p> <p>T-2(b) Ventura Road and Beverly Drive. The project developer shall be responsible for signalization of the intersection. Signalization shall occur prior to occupancy clearance for any portion of Phase 1 development.</p>	<p>Less than significant without mitigation.</p>
<p>Impact T-3 Future development anticipated under the proposed TCSP and additional annexation area would be consistent with the City’s General Plan and Bicycle Master Plan by developing bicycle and pedestrian facilities. Public transit facilities would be installed as part of the City’s General Plan. Impacts would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact T-4 Future development anticipated under the proposed TCSP would not increase hazards due to a design feature or incompatible uses and would not result in inadequate emergency access. Impacts would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
<p>Impact T-5 The proposed TCSP and development of the additional Annexation area would not conflict with or be inconsistent with CEQA Guidelines 15064.3(b). Impacts would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact T-6 Traffic generated by the proposed TCSP when added to the cumulative condition would result in levels of service that exceed City thresholds at four intersections. Mitigation is recommended to address this impact; however, automobile delay is no longer considered a significant impact in CEQA analysis. Therefore, impacts would be Class II, <i>less than significant</i>.</p>	<p>Impacts would be less than significant without mitigation. However, the following mitigation measures are recommended in order to minimize impacts to intersection LOS.</p> <p>T-3(a) Victoria Avenue/Doris Avenue. The project developer shall pay a fair share cost (estimated at 40%) towards implementing improvements to the Victoria Road and Doris Avenue intersection that add a third northbound through lane and a third southbound thru lane. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.</p> <p>T-3(b) Victoria Avenue and Teal Club Road. The project developer shall pay a fair share cost (estimated at 23%) towards implementing improvements to the Victoria Avenue and Teal Club Road intersection to signalize the intersection and add a third southbound thru lane. To provide for acceptable service levels, installation of a third northbound and southbound through lane, consistent with the future planned widening of Victoria Avenue to Primary Arterial (six-lane) standards, would be required. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.</p> <p>T-3(c) Patterson Road and Doris Avenue. The project developer shall pay a fair share cost (estimated at 21%) towards signalizing the intersection of Patterson Road and Doris Avenue. To provide for acceptable operations, a traffic signal should be installed and a left-turn lane and shared through/right-turn lane should be provided on all approaches. This will require widening of the eastbound approach. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
<p>Impact T-7 Traffic generated by the proposed TCSP when added to Buildout (2030) traffic conditions would result in future levels of service that exceed City thresholds at four intersections. Mitigation is recommended to address this impact; however, automobile delay is no longer considered a significant impact in CEQA analysis. Impacts would be Class III, <i>less than significant</i>.</p>	<p>Impacts would be less than significant without mitigation. However, the following mitigation measures are recommended in order to minimize impacts to intersection LOS.</p> <p>T-4(a) Victoria Avenue/Gonzales Road. The project developer shall pay a fair share cost (estimated at 10%) towards intersection improvements including conversation of the southbound right-turn lane to a shared through/right-turn lane, and conversion of the westbound #2 through lane to a shared through/right-turn lane. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution. Improvements shall occur in conjunction with the widening of Victoria Avenue south of Gonzalez Road to provide three southbound travel lanes.</p> <p>T-4(b) Patterson Road/Teal Club Road. The project developer shall pay a fair share cost (estimated at 17%) towards signaling the intersection of Patterson Road and Teal Club Road. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution.</p> <p>T-4(c) Ventura Road/Doris Avenue. The project developer shall pay a fair share cost (estimated at 33%) towards reconfiguring the intersection to a dedicated left-turn lane, a through lane, and a shared through/right-turn lane. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution. Improvements shall occur prior to Phase 2 occupancy clearance.</p>	<p>Less than significant without mitigation.</p>
UTILITIES AND ENERGY		
<p>Impact UTL-1 The proposed TCSP would generate an estimated 235,140 gallons of wastewater per day, which would flow to the Oxnard Wastewater Treatment Plant. The local treatment plant would have sufficient capacity to treat this increase in wastewater and local conveyance infrastructure would have sufficient capacity to convey flows from the site. Therefore, this impact is considered Class III, <i>less than significant</i>.</p>	<p>None Required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact UTL-2 Buildout under the proposed TCSP would generate an estimated water demand of about 447 acre feet per year. The City's projected water supply is expected to be adequate to serve the TCSP demands though the Year 2040. Impacts would be Class II, <i>significant but mitigable</i>.</p>	<p>UTL-2(a) Availability of Recycled Water. In order to ensure that the proposed TCSP or the area on the site south of Teal Club Road does not draw from Phase I AWPf recycled water, the City shall confirm that planned additional AWPf capacity is at least 50% funded and engineering plans are 25% completed before any building permits for the first phase of the TCSP or the area on the</p>	<p>Less than significant.</p>



Impact	Mitigation Measures	Residual Impact
	<p>site south of Teal Club Road are issued and/or adequate alternative new water are available.</p> <p>UTL-2(b) On-site Recycled Water System. The recycled water system serving the TCSP area and the area on the site south of Teal Club Road shall include the following:</p> <ul style="list-style-type: none"> • Pipeline extension from the mainline in Ventura Road to the property. The developer shall be responsible for either constructing the line or payment of fees to the City for its construction. • A recycled water system that serves all practical irrigated areas and which is: (1) separated from the domestic water system; (2) constructed per the City's Recycled Water Construction Standards; (3) irrigated at night; and (4) properly signed. Note that the signs shall be installed once the system is fully operational. • Mainline shall be a public system with meters, as appropriate, to recycled water customers. The developer shall be responsible for the design and construction of the recycled water main pipeline system within the development. Construction shall be per City standard requirements with payment of applicable fees. • Separate meters for the portion of the irrigated area intended for the future recycled water system and the portion of the system that will not be connected to the future recycled water system, if any. • Until the recycled water system is operational, the common area irrigation system shall be connected to the domestic system. Once recycled water is available, and connection to the recycled water system is made, the developer shall remove the connection to the domestic water system. • Prior to the availability of recycled water, the developer shall be responsible for payment of the Recycled Water Connection Fee or the water connection fee, whichever is greater for facilities constructed. • At such time as recycled water is available, the developer shall be responsible for all costs involved with the re-connection of the applicable portions of the irrigation system to the public recycled water system, including appropriate signage. Credits for connection fees shall be given by the City based on the size of the meter(s). Under no circumstance will there be a 	



Impact	Mitigation Measures	Residual Impact
	<p>refund of water connection fees already paid.</p> <ul style="list-style-type: none"> The developer shall be responsible for appropriate CCRs covering the use of recycled water within the property and for proper disclosures. <p>UTL-2(c) Exterior Water Conservation. The developer shall incorporate into the TCSP and the area on the site south of Teal Club Road the following exterior water conservation features in order to reduce water demand to the greatest extent feasible, with a goal of at least 30% water use reduction compared to traditional turf landscaping. These shall include, but are not limited to:</p> <ul style="list-style-type: none"> Landscape of common areas with low water-using plants (i.e., drought tolerant plant species); Weather-based irrigation controllers for all landscaped areas; Minimize the use of turf by limiting it to lawn dependent uses; and, Wherever turf is used, install warm season grasses. <p>UTL-2(d) On-site Domestic Water System. The on-site domestic water system shall include:</p> <ul style="list-style-type: none"> For the TCSP, connections to the City's system in at least two locations as approved by the City, generally located along the eastern side of the property (Ventura Road) and along either the north or south side of the development away from Ventura Road. There shall be an on-site looped main transmission system through the development. For the area of the site south of Teal Club Road, configuration of the on-site domestic water system will be determined in consultation with the City and meet City design requirements. Public pipeline systems which feed into separate water meters for each ownership. In addition, there shall be separate water meters for each multi-family unit. An internal water system designed to provide for the higher of either maximum day plus fire or peak hour demand. <p>UTL-2(e) Water Neutrality. To ensure that the proposed TCSP and the area of the site south of Teal Club Road meets the objectives of the City's Water Neutrality Policy, the City shall confirm, at the time individual phases of the project are reviewed and at the time development of the area of the site south of Teal Club Road is proposed,</p>	



Impact	Mitigation Measures	Residual Impact
	<p>that the FCGMA allocation transfer rate in place is sufficient to meet the water demand of the phase/area under consideration. Additional water demand above the amount of transferred supply, shall be provided by the applicant to offset the net additional water demand associated with the project. This shall be accomplished through a Water Neutrality Plan to be reviewed and approved by the City prior to issuance of any building permit. The Water Neutrality Plan shall contain any combination of the following measures, or other measures suggested by the Applicant, that are quantifiable, permanent offsets of existing potable water use elsewhere in the City, or bring new water supply to the City, that match or exceed potable water shortfall:</p> <ol style="list-style-type: none"> a. Use recycled water for indoor residential uses, including but not limited to, toilet flushing; b. Use recycled water for indoor business park and commercial and industrial elements of the project including, but not limited to, toilet and urinal flushing, process uses and air conditioning. c. Contribute to expansion of the City's water conservation program, such as but not limited to offsets available through programs such as toilet exchange and showerhead replacements; d. Provide to the City financial contributions towards City programs which generate in-City water conservation or recycled water capacity or conveyance not otherwise required by another State or local water conservation program; e. Participate in other similar programs with cumulatively result in an adequate water supply contribution; and f. Provide to the City water supplies equal to the shortage amount. <p>The City shall ensure implementation of the approved plan in all aspects of permitting and construction of individual phases addressed in the plan.</p>	
<p>Impact UTL-3 Current water system infrastructure would meet the City of Oxnard's water service pressure requirements and the Fire Department's fire flow requirements. Impacts would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>
<p>Impact UTL-4 The proposed TCSP would generate an estimated 2,383 tons of solid waste per year. This is within the existing capacity of solid waste disposal facilities serving the City. Therefore, this impact would be Class III, <i>less than significant</i>.</p>	<p>None required.</p>	<p>Less than significant without mitigation.</p>



Impact	Mitigation Measures	Residual Impact
Impact UTL-5 The project would result in use of substantial amounts of electricity and natural gas. However, compliance with General Plan policies and mitigation measures would avoid wasteful or inefficient use of energy, ensure consistency with existing energy standards, and would not preempt future energy development or conservation. Impacts would be Class III, <i>less than significant</i> .	None required.	Less than significant without mitigation.



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1.0 INTRODUCTION

This document is a Recirculated Draft Environmental Impact Report (EIR) (City of Oxnard EIR# 2015-01, SCH# 2012051080) for an EIR that was circulated but not certified that evaluates foreseeable physical environmental impacts that would result from approval of the Teal Club Specific Plan (TCSP) (PZ 15-640-01) and associated approvals including: a General Plan Amendment (PZ 15-620-03), Pre-Zoning (PZ 15-560-01), and Annexation (PZ 15-610-01) of the TCSP area and nine additional parcels in a County unincorporated area adjacent to the City of Oxnard (City), California. The EIR was prepared in accordance with the Guidelines for Implementation of the California Environmental Quality Act (CEQA), published by the Resources Agency of the State of California (Title 14, California Code of Regulations 15000 et. seq.), and the City’s procedures for implementing CEQA and established CEQA thresholds of significance.

This Draft EIR was prepared by professional planning consultants in conjunction with City Planning Division staff. The Final EIR will represent disclosures, findings, and conclusions of the City regarding the environmental impacts and related aspects of the proposed project.

This section describes: (1) the general background of the proposed project and the EIR process; (2); the purpose and legal authority of the EIR (3) the scope and content of the EIR; (4) the type of EIR, (5) lead, responsible, and trustee agencies; and (6) the CEQA-required environmental review process leading to the Final EIR that will inform the decision makers.

1.1 ENVIRONMENTAL IMPACT REPORT BACKGROUND

The City prepared an EIR Notice of Preparation (NOP) and distributed the NOP for agency and public review for the required 45-day review period between May 18, 2012 and July 2, 2012. During that period, the City received 18 comment letters and two e-mail comments. The NOP, Initial Study, and comment letters are presented in Appendix A.

A public EIR scoping meeting was held on June 4, 2012, in the City’s Community Room at 300 West Third Street. The intent of the scoping meeting was to provide interested individuals, groups, and public agencies a forum to provide input in an effort to assist in further refining the intended EIR scope and focus. Table 1-1 summarizes NOP and scoping meeting comments received and where in the EIR the comments are addressed. Selected comments were combined due to topic similarity, and comments outside of the scope of CEQA are omitted.

**Table 1-1
 Scoping Comments Received**

Subject	Where Subject is Addressed in EIR
Aesthetics <ul style="list-style-type: none"> • Concerns regarding phasing and implementation: visual blight if some areas remain unimproved or unoccupied • Concerns about increased graffiti • Loss of rural character and agricultural open space 	EIR Section 4.1 <i>Aesthetics</i>



**Table 1-1
 Scoping Comments Received**

Subject	Where Subject is Addressed in EIR
Agricultural Resources <ul style="list-style-type: none"> • Loss of high-quality soil and high-productivity agricultural land • Consistency with agricultural protection policies • Consider relocation of quality topsoil as a mitigation measure 	EIR Section 4.2 <i>Agricultural Resources</i>
Air Quality <ul style="list-style-type: none"> • Dust impacts on proposed park and residences from adjacent agricultural operations • Construction and operational emissions, dust 	EIR Section 4.3 <i>Air Quality</i>
Hazards and Hazardous Materials <ul style="list-style-type: none"> • Airport flight-related hazards • Impacts of potential light industrial uses south of Teal Club Road on proposed new residential and park uses 	EIR Section 4.7 <i>Hazards and Hazardous Materials</i>
Hydrology/Water Quality <ul style="list-style-type: none"> • Existing flooding on Patterson Road and Doris Avenue • Adequacy of storm water facilities to handle increased runoff 	EIR Section 4.8 <i>Hydrology and Water Quality</i>
Land Use <ul style="list-style-type: none"> • Compatibility between proposed Light Industrial zoning south of Teal Club Road and proposed new residential and park uses • Compatibility between proposed project and existing residences south of Teal Club Road • Loss of rural character and agricultural open space 	EIR Section 4.9 <i>Land Use and Planning</i>
Noise <ul style="list-style-type: none"> • Sirens from fire trucks based out of the proposed fire station • Airport operations 	<ul style="list-style-type: none"> • EIR Section 4.9 <i>Land Use and Planning</i> • EIR Section 4.10 <i>Noise</i>
Public Services and Utilities <ul style="list-style-type: none"> • Concerns about proposed density resulting in increase in crime • Adequacy of electricity supply to serve the project • Adequacy of water supply to serve the project 	<ul style="list-style-type: none"> • EIR Section 4.9 <i>Land Use and Planning</i> • EIR Section 4.12 <i>Public Services</i>
Transportation/Circulation <ul style="list-style-type: none"> • Increased congestion • Traffic safety • Appropriate traffic circle design • Need for bike lanes and sidewalks, and connectivity around the site and with other facilities: Doris Avenue, Patterson Road, Teal Club Road • Extent, location and type of proposed/required bicycle and pedestrian facilities. Potential conflicts with vehicles along Teal Club Road • Extent, location and type of proposed/required roadway improvements • Continuity of vehicular, bicycle and pedestrian facilities from City to County • Consistency with alternative transportation plans, goals and policies 	EIR Section 4.13 <i>Transportation and Circulation</i>



The original Draft EIR was circulated for a 63-day public review period that began on August 3, 2015 and ended on October 5, 2015. The City received 29 comment letters on the Draft EIR. In addition to written comments, verbal comments were received at the Planning Commission hearing of September 3, 2015. One of the commenters on the Draft EIR was Dr. Cesar Morales, Superintendent of Schools for the Oxnard School District (OSD). In the comment letter, Superintendent Morales explained that the Facilities Implementation Program Semi-Annual Report adopted by the OSD in January 2015 provided for the acquisition of a 20-25 acre site at the corner of Doris Avenue and Patterson Road within the TCSP area to develop school facilities. The proposed Specific Plan was put on hold pending a decision on the school site by OSD. While the proposed Specific Plan was on hold, the Draft EIR that was circulated in 2015 was not finalized and was not certified.

In February 2019, the OSD Board of Trustees approved a 25-acre parcel in the original TCSP area for development of a district office, a 700-student elementary school, and a 1,200-student middle school (although the OSD Board of Trustees approved the project, the land use permit approval from the City of Oxnard has not yet occurred). In response, the proposed Teal Club Specific Plan has been revised to remove that 25-acre area from the TCSP area. The revised TCSP would not include 58,000 square feet for a new school, fire station, and park as originally analyzed in the original 2015 EIR. In addition, the revised TCSP includes fewer-single family units and additional multi-family units than analyzed in the original EIR. The overall number of residential units remains the same. Table 1-2 identifies the differences between the original project EIR and the new revised project. Section 2.0, *Project Description*, includes a detailed description of the mix of land uses proposed in the new revised project.

This Recirculated Draft EIR analyzes the effects associated with the revised TCSP, taking into account changes to the environmental and regulatory setting and taking into account comments that were received in the original Draft EIR circulated in 2015.

**Table 1-2
 Comparison of 2015 Draft EIR Project with the Current Revised Project**

Characteristic	2015 Proposed Project (EIR)	Current Revised Project	Difference
Single Family Detached	350 units	220 units	-(130 units)
Multi Family	640 units	770 units	+130 units
Affordable Units	127 units	148 units	+21 units
Public/ Semi Public Use	25 acres	0 acres	-(25 acres)
Parks & Open Space	23.9 acres	17.76 acres	-(6.14 acres)
Commercial/ Mixed Use	6.2 acres	8.78 acres	+2.58 acres
Light Industrial	10.2 acres	9.11 acres	-(1.09 acres)
Arterial and Interior Roadways	34.3 acres	40.76 acres	+6.46 acres
Additional Parcels South of Teal Club Road			
Manufacturing space	5.7	5.7	0
Warehouse space	5.7	5.7	0

() denotes subtraction



1.2 PURPOSE AND LEGAL AUTHORITY

This EIR has been prepared in accordance with the CEQA and in accordance with Section 15121 of the *CEQA Guidelines*, the purpose of this EIR is to serve as an informational document that:

...will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

The EIR is an informational document for use by decision makers, public agencies, and the general public. It identifies a project's impact on the environment. It is not required to evaluate the environment's impact on the project. It is not a policy document that establishes City policy about the desirability of the proposed project or any component within it.

The proposed project requires discretionary approvals from the City of Oxnard (described in Section 2.6, *Required Discretionary Approvals*) and is therefore subject to the requirements of the CEQA (Public Resources Code, Section 21000, et. seq.).

1.3 SCOPE AND CONTENT

This EIR addresses the issues determined to be potentially significant by the City, expert consultation, and NOP responses. The EIR issues are:

- *Aesthetics*
- *Agricultural Resources*
- *Air Quality*
- *Biological Resources*
- *Geology and Soils*
- *Greenhouse Gas Emissions/Climate Change*
- *Hazards and Hazardous Materials*
- *Hydrology and Water Quality*
- *Land Use and Planning*
- *Noise*
- *Population, Education, and Housing*
- *Public Services and Recreation*
- *Transportation and Traffic*
- *Utilities and Energy*

Potential environmental impacts determined to be less than significant include the following, discussed in Section 6.0, *Effects Found Not to Be Significant*:

- *Cultural Resources*
- *Mineral Resources*
- *Tribal Cultural Resources*

This EIR addresses the issue areas referenced above and identifies the potentially significant environmental impacts, including site-specific and cumulative effects, of the proposed TCSP and development of the additional annexation area south of Teal Club Road. The EIR recommends feasible mitigation measures that would eliminate or reduce adverse environmental effects below the City's adopted thresholds of significance.



The EIR references pertinent City policies and guidelines, previously certified EIRs, adopted CEQA documents, and background documents prepared by the City. A full reference list is contained in Section 8.0, *References and Preparers*.

This EIR incorporates by reference the Oxnard 2030 General Plan Program EIR which was certified in 2011 when the 2030 General Plan was adopted.

The Alternatives section of the EIR (Section 7.0) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines*. The Alternatives discussion evaluates the CEQA-required “no project” alternative and three other alternative development scenarios for the TCSP area and nine additional parcels to be annexed. Section 7.0 identifies the CEQA-required environmentally superior alternative.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. The *CEQA Guidelines* provide the standard of adequacy on which this document is based. The *Guidelines* state:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure. (Section 15151)

1.4 TYPE OF EIR

This EIR is a Program EIR pursuant to Section 15168 of the *CEQA Guidelines*. As stated in this section of the *CEQA Guidelines*, a Program EIR is appropriate when a project can be characterized as one large project consisting of a series of actions that are related either geographically; as logical parts in a chain of contemplated actions; in connection with rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

Because it is a Program EIR, this EIR does not preclude the requirement for individual subsequent developments, such as an apartment complex or commercial center allowed within the adopted TCSP area and nine additional parcels to be annexed, to undergo additional more-detailed environmental review prior to entitlements. Subsequent environmental review should be limited to project-level impacts which (a) were not examined in this Program EIR, and (b) would be more significant than described in this Program EIR.

1.5 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

The City of Oxnard is designated the EIR lead agency and is responsible for the discretionary approvals that would allow subsequent development. Section 15367 of the State CEQA Guidelines defines a “lead agency” as:

“...the public agency which has the principal responsibility for carrying out or approving a project. The Lead Agency will decide whether an EIR or Negative Declaration will be required for the project and will cause the document to be prepared.”

This EIR provides environmental information to a number of County and California agencies that may be involved in serving the TCSP area and nine additional parcels to be annexed, or may otherwise have an interest in the proposed project’s potential environmental impacts. The Ventura County Local Agency Formation Commission (LAFCo), Metropolitan Water District (MWD), and Calleguas Municipal Water District (CMWD) are responsible agencies as they will each rely on this EIR for their respective annexation decisions. Section 15381 of the State CEQA Guidelines defines a “responsible agency” as:

“...a public agency which proposed to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term “Responsible Agency” includes all public agencies other than the Lead Agency which have discretionary approval power over the project.”

The California Department of Fish and Wildlife (CDFW) and the Los Angeles Regional Water Quality Control Board (RWQCB) may have permitting authority (and thus discretionary approval power) over the proposed project in relation to potential wetlands, riparian habitats, or jurisdictional waters. Thus, these agencies are considered responsible agencies under State CEQA guidelines. Any activity that would remove or otherwise alter wetland and riparian habitats is subject to scrutiny by these regulatory agencies through the CEQA review process. Later, if applicable, these activities would be regulated through the CDFW, U.S. Army Corps of Engineers (USACE), and RWQCB permitting processes. For further discussion of potential permitting requirements for biological resources on the project site, please refer to Section 4.4, *Biological Resources*, of this EIR.

Trustee agencies have jurisdiction over certain resources held in trust for the people of California but do not have a legal authority over approving or carrying out the project. CEQA Guidelines Section 15386 designates four agencies as trustee agencies: CDFW with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission with regard to state-owned “sovereign” lands, such as the beds of navigable waters and state school lands; the California Department of Parks and Recreation, with regard to units of the state park system; and, the University of California, with regard to sites within the Natural Land and Water Reserves System. The CDFW may be a trustee agency for wetland and riparian habitat for the proposed project pursuant to Section 1600 et seq. of the California Fish and Game Code. Finally, the Oxnard School District and/or Oxnard Unified High School District may wish to use this EIR in whole or in part for consideration of new schools within the TCSP area under their separate respective procedures.



The City also solicited the input of the Ventura County Airport Land Use Commission; California Division of Aeronautics; California Department of Education; the Cities of San Buneventura (Ventura), Port Hueneme, and Camarillo; and the County of Ventura.

1.6 ENVIRONMENTAL REVIEW PROCESS

The major steps in the CEQA environmental review process are outlined below in sequential order. Figure 1-1 illustrates the review process.

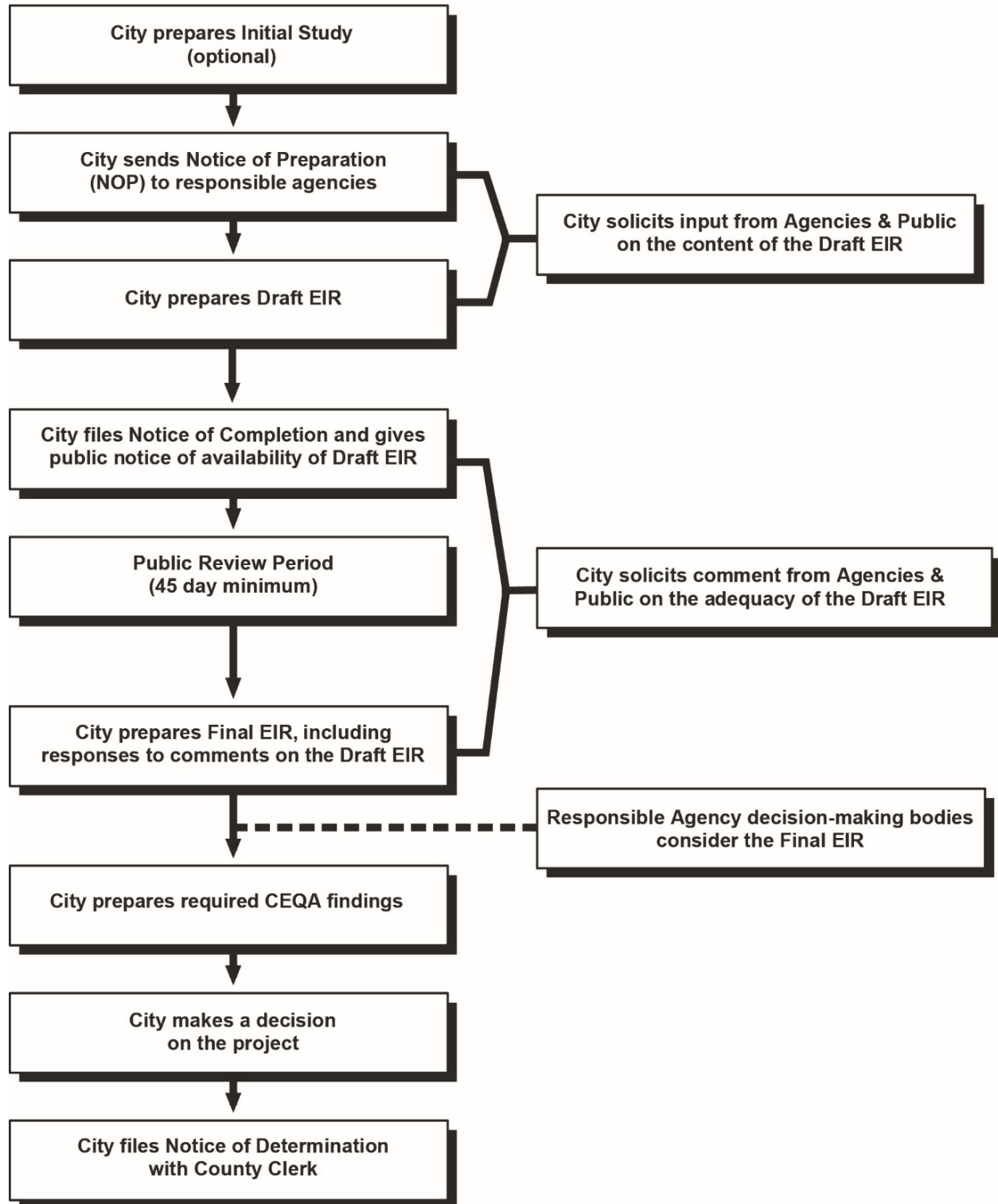
1. **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency files a NOP with the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092). The NOP must be posted in the County Clerk's office for 30 days (or 45 days for projects requiring review by the State Clearinghouse). The NOP may be accompanied by an Initial Study that identifies the issue areas for which the proposed project could create significant environmental impacts.
2. **Draft Environmental Impact Report (DEIR) Prepared.** The DEIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and, h) discussion of irreversible changes.
3. **Notice of Completion.** A lead agency must file a Notice of Completion with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the Notice in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the Notice to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of DEIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public, and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a DEIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the Clearinghouse (Public Resources Code Section 21091) approves a shorter period.
4. **Final EIR.** A Final EIR (FEIR) must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and, d) responses to comments on the DEIR.
5. **Certification of FEIR.** Prior to approving a proposed project, the lead agency must certify that: a) the FEIR has been completed in compliance with CEQA; b) the FEIR was presented to the decision-making body of the lead agency; and, c) the decision-making body reviewed and considered the information in the FEIR prior to approving a project (*CEQA Guidelines* Section 15090).



6. **Lead Agency Project Decision.** A lead agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or, c) approve a project despite its significant environmental effects, if the proper findings and Statement of Overriding Considerations are adopted (*CEQA Guidelines* sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or, c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination.** An agency may file a Notice of Determination after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days and sent to anyone previously requesting notice to start a 30-day statute of limitations on CEQA legal challenges [Public Resources Code Section 21167(c)].



Figure 1-1 Environmental Review Process



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2.0 PROJECT DESCRIPTION

This section describes the project location, characteristics of the site and the proposed development, project objectives, and the approvals needed to adopt the proposed Specific Plan and Pre-Zoning and seek annexation to the City. Actual development will require subsequent approvals and permits.

The proposed project involves the adoption of a Teal Club Specific Plan (TCSP), a Specific Plan that would involve residential, commercial, and park uses on the 149.72-acre area Teal Club Specific Plan area (“TCSP area”). The TCSP area includes seven agricultural parcels currently in active agricultural production, two of the parcels (seven acres) are located within the City of Oxnard and five parcels (142.72 acres) are in the County of Ventura. Therefore, the proposed project would also involve Pre-Zoning that would allow for the Annexation of a 142.72-acre collection of five agricultural parcels to the City of Oxnard (City), Annexation approval by the Ventura County Local Agency Formation Commission (LAFCo), and Annexation to the Calleguas Municipal Water District (CMWD) and Metropolitan Water District (MWD). The TCSP area is also within the land use planning area for the Oxnard Airport and would require approval by the Ventura County Airport Land Use Commission.

The TCSP Specific Plan would involve development on the 149.72-acre area north of Teal Club Road (known locally as “Teal Club”). Development of the TCSP area would involve construction of up to 990 single and multifamily residential units (of which approximately 148 would be affordable housing units); development of up to 132,000 gross square feet (gsf) of business park; up to 60,000 square feet of Urban Village commercial space; 17.76 acres of community and neighborhood parks and open space; new and widened on- and off-site arterials and collector streets; utility infrastructure including complete recycled water irrigation; resident and visitor parking; bicycle and pedestrian paths and sidewalks; bus transit stops; various pocket parks and resident recreation areas; and landscaping within the individual residential projects. In compliance with the LAFCo policy to avoid creating unincorporated islands, the project includes Annexation of 11.4 acres (9 parcels) south of Teal Club Road that would be Pre-Zoned Light Manufacturing (M-1) with capacity for up to 347,608 gsf of manufacturing uses. The project site is entirely within the Oxnard City Urban Restriction Boundary (CURB) and, therefore, does not require voter approval to adopt the proposed TCSP, Pre-Zoning, and Annexations. Overall, the entire project area is 161.12 acres (149.72-acre TCSP area plus the 11.4-acre additional Annexation area).

2.1 PROJECT APPLICANT

Teal Club Specific Plan Applicant:

Borchard Property Co-Owners

211 Village Commons Boulevard #15, Camarillo, California 93012

Applicant’s Representative: Dennis Hardgrave, (805) 484-8303

Applicant for CMWD, MWD, and LAFCo Annexations:

City of Oxnard, Planning Division

214 South C Street, Oxnard, California 93030

Contact: Jay Dobrowalski, (805) 385-3948



2.2 PROJECT LOCATION

For the purpose of this analysis, the “project area” refers to the 161.12-acre project area that includes both the 149.72-acre TCSP area and the 11.4-acre area south of Teal Club Road to be annexed into the City of Oxnard. The majority of the project area is located in the unincorporated area of Ventura County within the Oxnard Sphere of Influence (SOI) while two parcels are located in the City of Oxnard. The project area is north of the Oxnard Airport. The TCSP area and the additional Annexation area are in the Airport’s Traffic Pattern Zone. The TCSP area is within the established City of Oxnard Urban Restriction Boundary (CURB). The entire project area is bounded on the north, south, and east by the City of Oxnard.

The 149.72-acre TCSP area comprises legal lots consisting of seven contiguous assessor’s parcels bounded by Doris Avenue on the north, Patterson Road and a planned future site for Oxnard School District educational facilities on the west, Teal Club Road on the south, and Ventura Road on the east.

The additional annexation area comprises nine assessor’s parcels on the south side of Teal Club Road, north and west of Little Farms Road and bisected by Mallard Way. Regional access to the project site is provided by the Ventura Freeway (Highway 101) and the Pacific Coast Highway (State Route 1).

The regional location is illustrated in Figure 2-1. Figure 2-2 shows the local location and an aerial view of the TCSP area and surrounding uses. Assessor Parcel Numbers for the TCSP and the proposed additional annexation area are listed in Table 2-1.

Under CEQA Guidelines Section 15206(b)(2)(A), the TCSP is classified as a project of “regional significance” because it includes more than 500 housing units. The Oxnard 2030 General Plan Program EIR evaluated the TCSP at the programmatic level and is incorporated by reference.

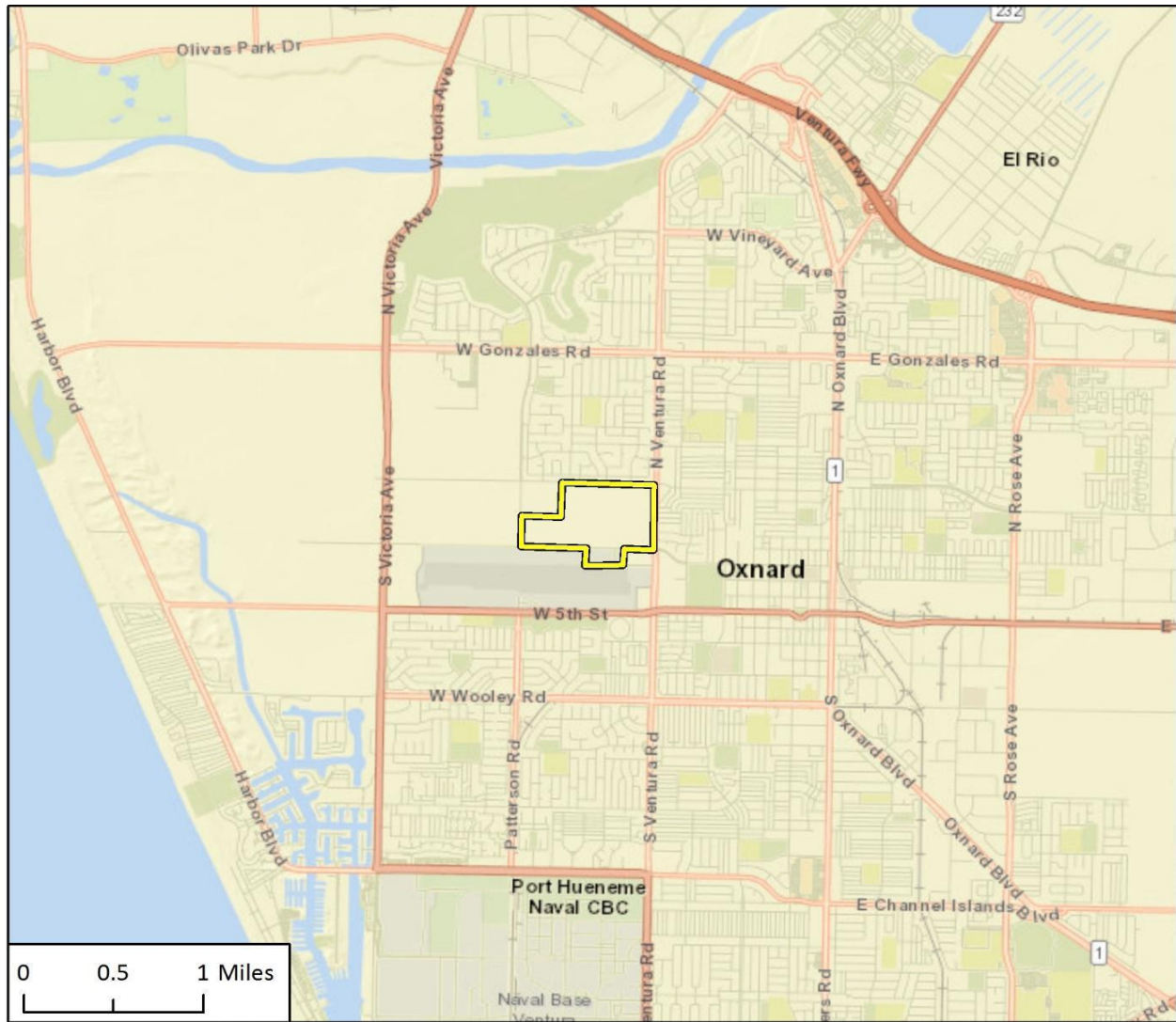
**Table 2-1
Assessor’s Parcels (2013)**

Teal Club Specific Plan Area		
183-0-070-06	183-0-070-07	183-0-070-24
183-0-070-11	183-0-070-12	183-0-070-13
183-0-070-14		
Additional Annexation Area		
183-0-110-03	183-0-110-04	183-0-110-05
183-0-110-25	183-0-110-26	183-0-110-27
183-0-100-40	183-0-100-55	183-0-100-56
Parcels (Agricultural Land) Potentially Partially Affected by Future Right-of-Way and Road Widening of Teal Club Road From Patterson Road to Victoria Avenue and Patterson Road adjacent to the Specific Plan Area		
183-0-070-01, 183-0-060-12, 183-0-060-24, 183-0-060-25, 183-0-060-26, 183-0-060-32, 183-0-060-39, 183-0-060-45.		

Source: Ventura County Assessor’s Office, Parcel Maps, 2019



Figure 2-1 Regional Location



Imagery provided by Esri and its licensors © 2018.

 Project Location

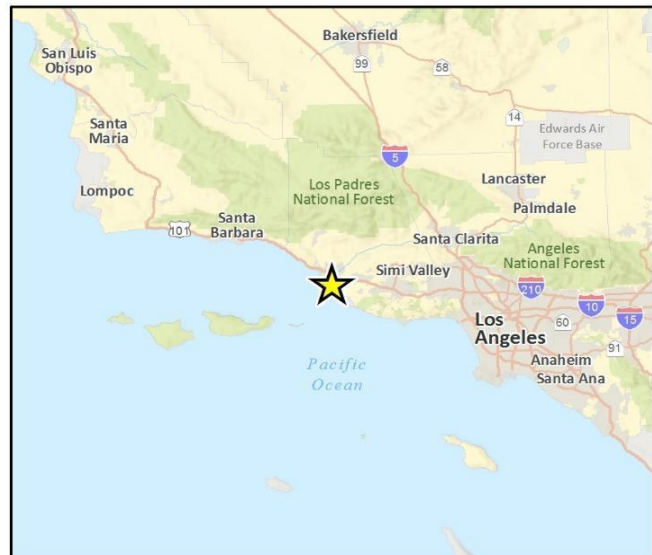
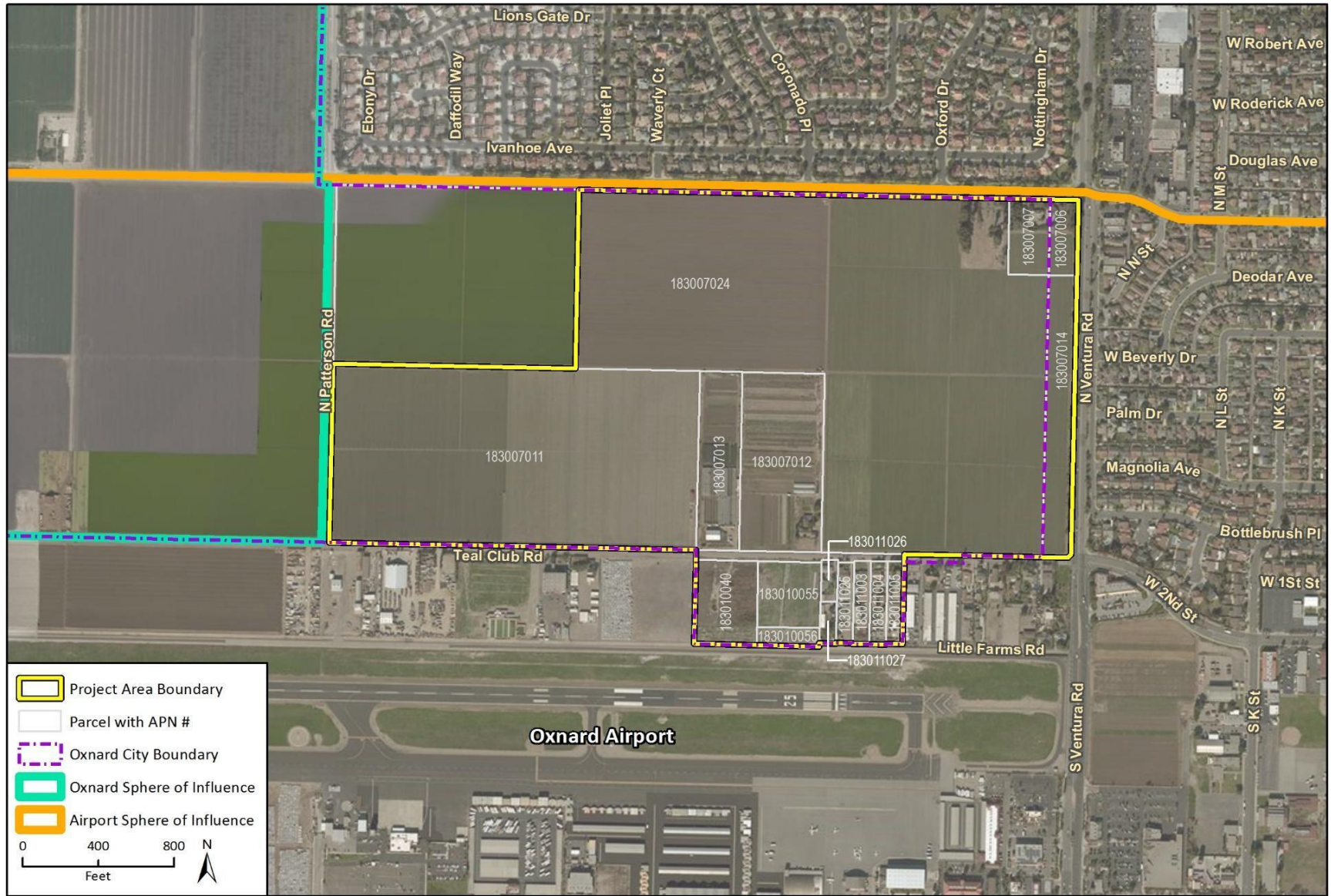


Fig 2-1: Reg. Locn (PEO)



Figure 2-2 Project Site Location



Imagery provided by Microsoft Bing and its licensors © 2019.
 Project area boundary hand digitized from: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc. Additional data provided by County of Ventura 2018.

Fig 2-2 TCSP Project Location



2.3 CURRENT LAND USE AND REGULATORY SETTING

2.3.1 Current Land Use

The TCSP area is in active agricultural use, currently cultivated with row crops, and there are agricultural amenities including a barn and greenhouses in the central-southern portion along Teal Club Road and two occupied single-family residences (one just east of the barn and one in the northeastern corner at Doris Avenue and North Ventura Road). The additional parcels south of Teal Club Road are a mix of vacant land (the westernmost three parcels) and residential development, including approximately six single family residences with ancillary vehicle storage and shop uses (the easternmost six parcels). Views of the TCSP area and nine additional parcels to be annexed from surrounding areas and views of surrounding areas are shown on figures 4.1-1a and 4.1-1b in Section 4.1, *Aesthetics*. Table 2-2 below and Figure 4.9-2 summarizes the existing characteristics and zoning designations of the TCSP area and the nine additional parcels to be annexed south of Teal Club Road.

**Table 2-2
Existing TCSP Area Characteristics**

Project Area Size	161.1 acres (including 11.4 acres of land to be annexed)
General Plan Land Use Designations	County of Ventura: Agricultural City of Oxnard: Residential Low, Residential Low Medium, Residential Medium, Residential High, Commercial General (with Urban Village designation), Business & Research Park, Park, Open Space; Airport Compatible
Zoning Designations	County of Ventura: Agricultural Exclusive-40 City of Oxnard: Two parcels (7 acres) in City of Oxnard zoned R1 (Single Family Residential). No City zoning for unincorporated County properties.
Airport Land Use Plan Designation	Traffic Pattern Zone
Current Use and Development	Agriculture, single-family residential, vehicle storage, vacant
Surrounding Land Use/ Zoning Designations	North: Residential Low Density / Single Family Residential and Single Family Residential Planned Development South: Airport Compatible and Public/Semi Public (Oxnard Airport) / Business & Research Park, Light Manufacturing Planned Development, Manufacturing Planned Development, and Single Family Residential East: Residential Low Density and Community Commercial/ General Commercial (C-2), General Commercial Planned Development (C-2-PD), and Single-Family Residential (R-1) West: Agriculture Exclusive (County of Ventura)
Regional Access Local Access	Highway 101, State Route 1 (Pacific Coast Hwy), Victoria Ave Ventura Rd, Teal Club Rd, Doris Ave, Patterson Rd
Public Services	Water: On-site wells Sewer: On-site septic systems Fire: Ventura County Fire Department Police: Ventura County Sheriff



2.3.2 Land Use Regulatory Overview

County of Ventura General Plan. The majority of the TCSP area is located in unincorporated Ventura County, with the exception of two parcels encompassing seven acres which are located within the City of Oxnard. The TCSP area and the nine additional parcels south of Teal Club Road are designated Agricultural-Urban Reserve in the Ventura County General Plan.

City of Oxnard 2030 General Plan. Two parcels in the TCSP area are located in the City of Oxnard and the TCSP area is fully within the City of Oxnard Sphere of Influence and CURB. The Oxnard 2030 General Plan land use designations are residential low, low-medium, medium, and high; general commercial, park, public facility, business research park, and open space with an “Urban Village” overlay on the entire development area of the specific plan. As defined in General Plan Goal CD-7, Urban Villages are intended to support “development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.” Policy CD 7.1 specifically addresses the Teal Club site:

***CD-7.1 Establishment of Urban Villages:** Six areas of the City are initially designated as Urban Villages. It is the intent of the Urban Village designation that specific or strategic plans for each area will be prepared in advance of the planning entitlement process. Additional Urban Villages and guidelines may be subsequently adopted by the City Council. Urban Villages are envisioned as characterized by:*

- *Infill and/or development of formerly agricultural land*
- *Reinvestment in the existing community*
- *Mixture of land uses*
- *Mix of residential densities and housing types*
- *Providing a minimum of 15 % affordable housing*
- *Location along or near corridors, downtown, and transit nodes*
- *Transit, pedestrian, and bicycle circulation given high priority*

Teal Club Specific Plan:

- **Location.** *Teal Club Road, Patterson Road, Doris Avenue, and Ventura Road.*
- **Land Use.** *Transit oriented residential with supporting mixed use, schools, parks, and neighborhood commercial services.*
- **Overview.** *The intent of this urban village is to encourage neotraditional town planning compatible with surrounding uses and the Oxnard Airport with a focus on sustainability by using green building and planning principles, provision of adequate public and semi-public uses, transit-oriented development, and an identity creating entry component facing Ventura Road. A central focus of this development will be in the provision of balanced community with jobs, school, recreation, shopping, and affordable and market-rate housing.*

The Oxnard 2030 General Plan includes additional goals and policies that apply specifically to the Urban Village designation and to the proposed project in general, as discussed further in Section 4.9, Land Use and Planning. Notable among these is Goal SC-3, “Energy Generation and Increased Efficiency (Energy Action Plan) - Energy efficiency performance standards and



generation from renewable sources” and its related sustainability policies applicable to the proposed project.

The additional nine annexation parcels (11.4 acres) south of Teal Club Road are designated for Airport Compatible land uses. As described in the 2030 General Plan, this designation requires airport compatible land uses that do not interfere with airport operations or subject large numbers of persons to aircraft hazards. Airport Compatible uses need not be directly related to or dependent upon the adjacent airport. Uses must be consistent with the policies of the City; the Federal Aviation Administration (FAA); the California Department of Transportation (Caltrans), Division of Aeronautics; and the Ventura County Airport Land Use Commission. Allowable uses are typically of a limited industrial or specialized commercial nature.

Airport Comprehensive Land Use Plan. The TCSP area is in the Land Use Study Area of the Oxnard Airport. The Ventura County Airport Land Use Commission’s Airport Comprehensive Land Use Plan (2000) provides “... for the orderly growth of each public airport and the area surrounding the airport... [and] safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general” (California Public Utilities Code Section 21675). Prior to making a final decision on the TCSP, the City of Oxnard will refer the TCSP to the Airport Land Use Commission for a consistency review with the Airport Land Use Plan. Various regulations of the Federal Aviation Administration also apply to land use and structural development in proximity to active airports.

Local Agency Formation Commission. The Ventura Local Agency Formation Commission (“LAFCo”) operates under the provisions of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code Section 56000 et seq.). LAFCos implement State and local policies relating to boundary changes for cities and most special districts, including spheres of influence, incorporations, annexations, reorganizations and other changes of organization. In this capacity the Ventura LAFCo reviews, approves or denies proposals for annexations. In considering whether to approve or deny the proposed TCSP project annexation to the City of Oxnard, LAFCo will assess consistency of the annexation with LAFCo policies and standards. LAFCo’s “Guidelines for Orderly Development” were adopted by the Board of Supervisors and all cities within Ventura County. The guidelines require that urban development be located within incorporated cities whenever or wherever practical. LAFCo generally avoids creating unincorporated islands and attempts to eliminate existing unincorporated islands as a condition of approval for nearby annexations. For that reason, the TCSP project includes the nine parcels south of Teal Club Road to create one contiguous annexation area and avoid creating unincorporated islands.

Senate Bill No. 610 – Water Supply Assessment (WSA). Senate Bill No. 610 (Costa) requires identification of existing water supply entitlements, water rights, or water service contracts for the proposed project and water received in prior years pursuant to those entitlements, rights, and contracts as part of a Water Supply Assessment (WSA). A WSA for the TCSP is included as a technical appendix.

Greenbelt Agreement. The City of Oxnard is party to two greenbelt agreements, the Oxnard-Camarillo Greenbelt Agreement and the Ventura-Oxnard Greenbelt Agreement. The Oxnard-Camarillo Greenbelt Agreement was established in 1982 and covers 27,000 acres in



unincorporated Ventura County. The Ventura-Oxnard Greenbelt covers approximately 5,104 acres of unincorporated County territory and begins on the west side of Patterson Road. The TCSP area is not located in either of these greenbelts, but is immediately adjacent to the Oxnard-Ventura Greenbelt. The areas where road widening would occur on Teal Club Road and Patterson Road are in the Ventura-Oxnard Greenbelt.

2.4 PROJECT OBJECTIVES

According to CEQA Guidelines 15124(b), the Project Description of an EIR should include “a statement of the objectives sought by the proposed project” which should include “the underlying purpose of the project and may discuss the project benefits.” The purpose of the project objectives are to “help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary.”

The objectives for the proposed project include the following objectives for both the project proponent and the City of Oxnard.

TCSP Project Proponent:

- 1) *Create an integrated land, transportation, and infrastructure plan that allows for a mix of residential, mixed-use and commercial development to minimize the need for short distance single-person vehicle trips both within the project and within the City.*
- 2) *Provide a balance and economic match, to the extent feasible, between on-site housing and employment opportunities.*
- 3) *Create an integrated vehicular, pedestrian and bicycle circulation system that connects residential, industrial and commercial uses within the project.*
- 4) *Create recreational opportunities accessible to the neighborhood and City of Oxnard.*
- 5) *Establish land uses that permit a range of housing opportunities with varying densities, types, styles, prices and tenancy characteristics including compliance with the 2030 General Plan Housing Element affordability requirements.*
- 6) *Adopt design guidelines and regulations to provide for consistent and orderly implementation of the plan.*
- 7) *Provide development and transitional land use patterns that do not conflict with surrounding land uses and neighborhoods.*
- 8) *Avoid leapfrog development and accommodate projected growth in a location adjacent to existing infrastructure, urban services, existing circulation elements and community facilities.*
- 9) *Minimize traffic trips by providing a variety of neighborhood services in the commercial area of the project.*
- 10) *Establish development regulations to ensure residential neighborhoods are compatible with the surrounding area and all proposed land uses are properly integrated or buffered, as appropriate.*
- 11) *Access the City's Advanced Water Purification program for non-potable water uses.*
- 12) *Provide an adequate buffer between the TCSP area and agricultural uses to the west on both an interim and permanent basis, as needed.*
- 13) *Utilize commercial land uses to buffer the TCSP area from the Oxnard Airport to the south.*
- 14) *Provide bike and trail linkages between the TCSP area and existing facilities.*
- 15) *Provide land for a potential fire station, if needed.*



- 16) Provide a mix of land uses that are financially independent, sustainable, and not a fiscal burden on the General Fund of the City of Oxnard.
- 17) Ensure appropriate phasing and financing for community facilities including street and road improvements, water, urban runoff and flood control facilities, and parks.
- 18) Create neighborhoods with lasting value by setting high quality standards for residential and commercial land development and related public improvements.
- 19) Comply with the State of California’s “Build it Green” standards.

City of Oxnard:

- 1) Develop a project consistent with the 2030 General Plan and other adopted and relevant City policies and capital improvement plans and programs.
- 2) Incorporate innovative, feasible, flexible features that assist the City in implementing relevant 2030 General Plan and related environmental, economic development, and planning goals, policies, and programs.

2.5 PROJECT CHARACTERISTICS

2.5.1 Teal Club Specific Plan

The TCSP was developed to be consistent with the 2030 General Plan and related City Master Plans and policies, and in consultation with the Oxnard School District (OSD) and Oxnard High School District (OHSD). The TCSP sets forth a proposed development program within 14 proposed Planning Areas (PA) for a mix of land uses on the approximately 149.72-acre TCSP portion of the project area. The TCSP area does not include the additional annexation parcels, totaling 11.4 acres south of Teal Club Road.

Table 2-3 provides a breakdown of the proposed land uses in Figure 2-3, followed by general descriptions of land uses. After LAFCo’s approval of the annexation, the TCSP area Pre-Zoning would convert to City of Oxnard zoning.

**Table 2-3
Proposed Land Uses**

Land Use	Maximum Density	Total Planned			
		Acres ¹	Units ²	Square Feet	
<u>TEAL CLUB SPECIFIC PLAN AREA</u>					
RESIDENTIAL					
PA-1 Detached Cluster Residential	10 DU/Ac.	17.52	140	8 DU/Ac.	-
PA-2 Detached Cluster Residential	10 DU/Ac.	10.01	80	8 DU/Ac.	-
Subtotal Single-Family Detached	-	27.53	220	-	-
PA-3 Attached Residential	18 DU/Ac.	9.60	145	15DU/Ac.	-
PA-4 Attached Residential	18 DU/Ac.	5.54	88	16 DU/Ac.	-
PA-5 Attached Residential	30 DU/Ac.	10.57	240	23 DU/Ac.	-
PA-11 Attached Residential	12 DU/Ac.	15.64	167	11 DU/Ac.	-



Teal Club Specific Plan EIR
Section 2.0 Project Description

PA-12 Attached Residential	30 DU/Ac.	4.43	100	23 DU/Ac.	
Commercial/Mixed Use (Residential)	-	0.0	30	-	-
Subtotal Multi-Family	-	45.78	770	-	-
TOTAL RESIDENTIAL	-	73.31	990	-	-
(Affordable Units)			148³		
NON-RESIDENTIAL					
PA-8 Community Park	-	6.50	0	-	-
PA-9 Community Park	-	3.50	0	-	-
PA-10 Community Park	-	7.38	0	-	-
Beverly Dr. Greenbelt		0.38	0		
Parks & Open Space Subtotal		17.76	0	-	-
PA-6 Commercial/Mixed Use	-	4.35	0	-	10,000
PA-7 Urban Village Commercial	-	4.43	0	-	50,000
Commercial/Mixed Use Subtotal	-	8.78	0	-	60,000
PA-13 Business Research Park	-	6.19	0	-	88,000
PA-14 Business Research Park	-	2.92	0	-	44,000
Light Industrial Subtotal	-	9.11	0	-	132,000
Ventura Road	-	2.82	0	-	-
Doris Avenue	-	2.80	0	-	-
Patterson Road	-	0.30	0	-	-
Teal Club Road	-	7.20	0	-	-
Arterial Roadways Subtotal	-	13.12	0	-	-
Interior Roadways shown in Fig. 2-3	-	22.18	0	-	-
Detention Basins	-	5.46	0	-	-
Interior Roadways & Misc. Subtotal	-	27.64	0	-	-
TOTAL TCSP AREA	-	149.72	990	-	192,000
ADDITIONAL PARCELS SOUTH OF TEAL CLUB ROAD (see Subsection 2.5.2)					
Manufacturing Space	-	~5.7 ⁴	-	-	173,804
Warehouse Space	-	~5.7 ⁴	-	-	173,804
Additional Parcels Subtotal	-	11.4	-	-	347,608

Sources: Development Planning Services, July 2019; City of Oxnard, 2019.

PA = Planning Area

¹ Land use acres shown in this table are Net Area, measured from the right-of-way line of streets shown in the Teal Club Specific Plan Land Use Plan, Figure 2-3.

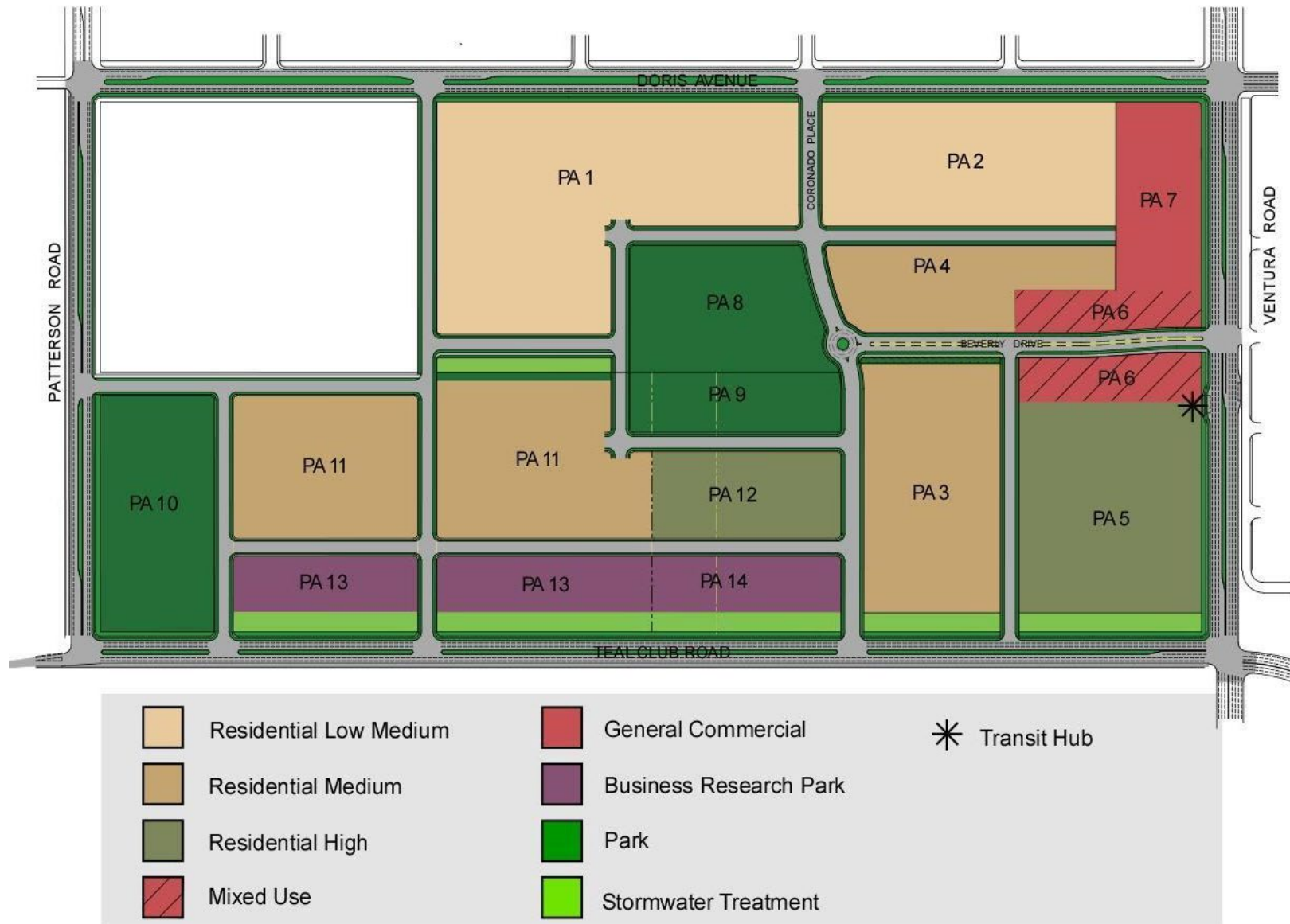
² The number of units within any residential land use area may be refined during the course of subsequent City review and approval, provided that the total number of units within the Specific Plan does not increase beyond that shown in this table, or subsequent CEQA analysis shows that the level of development would not result in new or substantially more significant impacts would occur requiring further CEQA review.

³ Includes approximately 148 affordable units. The affordable units would comprise 15% of the total project area residential development, as the entire residential project area is defined as "Urban Village". Levels of affordability would be approximately 40% Very Low income and 60% Low income. Approximately 80 affordable units would be built as part of Phase 1 and 40 as part of Phase 2. Affordable units would be generally distributed between Planning Areas 5, 11 and 12.

⁴ Assumed half of 11.4-acre area for manufacturing space (5.7 acres) and half for warehouse space (5.7 acres)



Figure 2-3 Proposed Teal Club Specific Plan Planning Areas



Residential Land Use. The TCSP envisions development of up to 990 residential dwelling units in a variety of densities and product types including both market-rate and affordable housing. A total of 148 affordable housing units, 15% of the overall project units, are included in the total unit count and would not, when combined with market rate units, exceed 990 total residential dwelling units. Affordable units include only units affordable to extremely low, very-low, and low-income households. Moderate rate units, for sale or for rent, may not be counted towards the affordable housing TCSP requirement but will be counted towards meeting the City's Regional Housing Needs Assessment (RHNA) for 2014 to 2021.

In addition to single-family residential units, the TCSP includes single-family courtyard homes, single-family townhomes and multi-family condominiums and apartments. The detached single-family homes and townhomes (primarily low-medium density) would be located near Doris Avenue and the interior of the project site. The higher-density units (condominiums and apartments) would be placed on the easterly portion of the site along Teal Club Road and Ventura Road. Product highlights are below:

Two choices of detached two-story single-family homes are proposed as follows (in PA1 and PA-2):

- Single-family detached homes with minimum lot sizes of 2,500 square feet and maximum building area of 2,400 square feet; and
- Single-family detached courtyard homes with minimum lot sizes of 2,500 square feet and maximum building area of 2,400 square feet.

Multifamily attached dwellings (medium density in PA-3, PA-4 and PA-11 and high density in PA-5 and PA-12) would comprise approximately 33% of the residential units. In PA-3, PA-4, and PA-11 two and three-story townhomes and condominiums would be constructed with first-floor garages. These buildings would take access from alleys, and face either onto a street or a shared common open space paseo. Unit sizes are anticipated to range from 800 to 2,000 square feet. In PA-5, the applicant envisions multiple-story apartment buildings with a required density of up to 30 units per acre in accordance with the City's 2014-2021 Housing Element requirements for meeting the 2014-2021 RHNA.

Commercial and Mixed Use. The TCSP includes up to 60,000 gross square feet (gsf) of retail, mixed use, and office uses on 8.78 acres (PA 6 and 7). The general commercial would be located in the eastern portion of the TCSP area along Ventura Road. The general commercial would be oriented around a public plaza and would be within walking distance of residential units and readily accessible to a new bus stop on Ventura Road. Typical commercial neighborhood retail and service uses could include a coffee shop, deli or sandwich shop, restaurants, dry cleaner, consumer electronics retail, mailbox/package business, flower shop, hair salon, or copy center. Leasing preferences and incentives may be required so that the commercial provides a mix of uses that reduce vehicle trips by residents.

Business and Research Park (BRP Zone). Up to 132,000 gsf of Business and Research Park uses on 9.11 acres (PA 13 and 14) are proposed in the southern portion of the TCSP, fronting Teal Club Road. Typical uses in the BRP zone include professional, administrative and high technology research and manufacturing uses along with limited commercial activities



intended to support such uses. Service uses could include research and development; laboratories; out-patient clinics; printing or photocopying; administrative, financial, or medical offices; restaurants and delicatessens; business furniture and equipment sales; florists; warehousing and distribution; automobile rental agencies; and adult day care facilities. Manufacturing and assembly uses could include electronics, ceramics/glass, light metal consumer goods, plastics and fabrics, and/or electronic instruments. Related uses could include drive-through services; convenience markets and drugstores; on-site alcohol sales; and private emergency medical facilities, among others. These uses would be subject to the City's zoning code and applicable reviews and approvals under existing uniformly applied procedures and regulations.

Parks and Open Space. The TCSP includes a 10-acre public (City) Community Park (PA 8 and PA 9) with playground equipment, picnic tables, restrooms, and backstops and fencing for softball/baseball play and soccer use. An additional 7.38-acre park is proposed in PA 10. Within the residential and commercial PA's there is a 0.38-acre greenbelt. The greenbelt and neighborhood parks combine for a total of 17.76 park and open space acres.

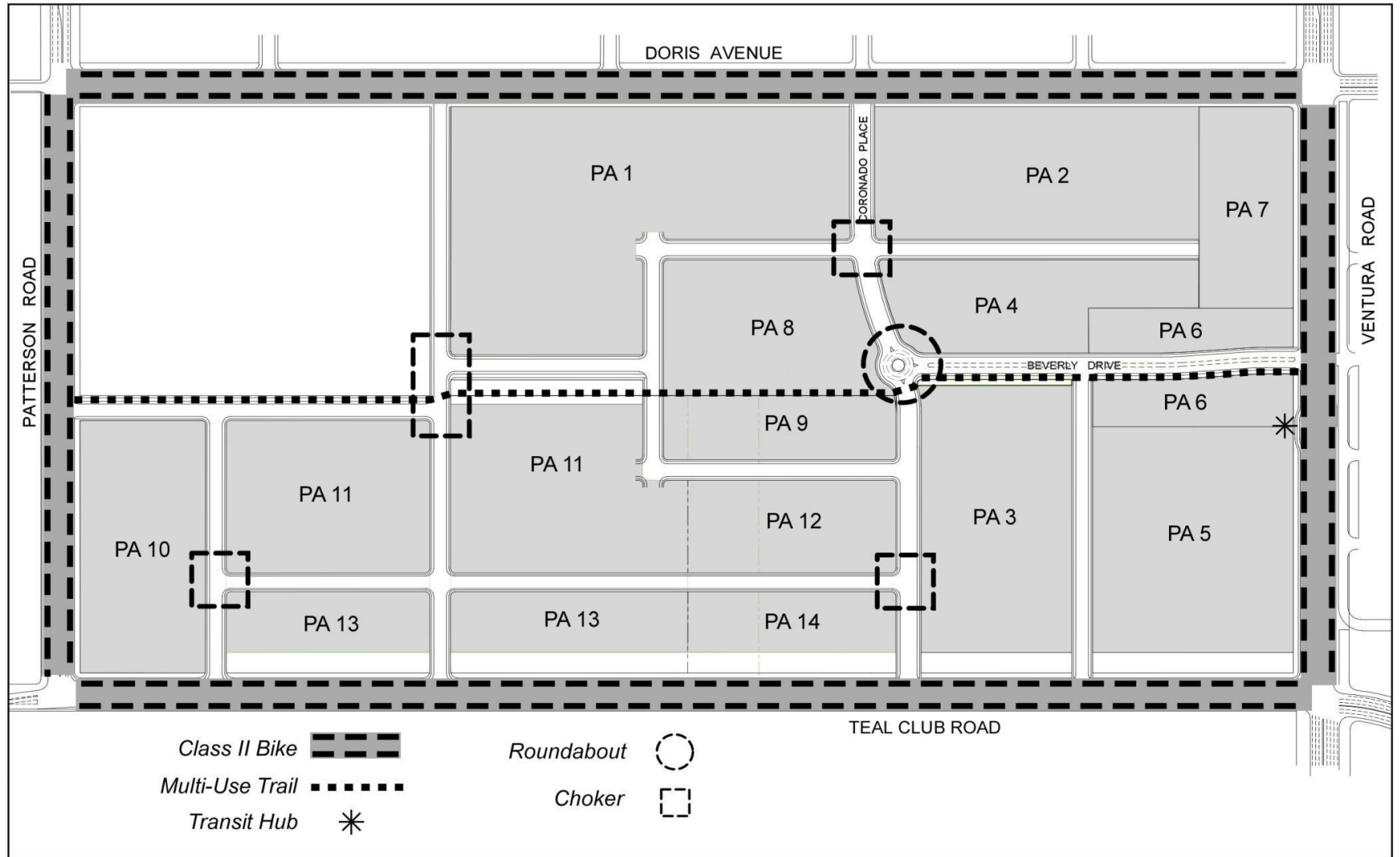
Community Design. The TCSP consists of traditional neighborhood design components that promote "porch and street orientation" and encourage walking and interaction between residents. Both single-family residences (Low-Medium Density) and courtyard/cluster homes (Low-Medium Density) would include porches and architectural elements reflecting the early 20th Century diversity and character of style evident in the nearby F and G Streets historic district and other recently developed neighborhoods. High, Medium, and Medium-High Density areas would orient to internal pathways and common areas with connection to the public walking network and to the urban village. The proposed circulation plan for the TCSP area is shown on Figure 2-4.

Off-site Improvements and Utilities.

Public Roads. Intersection improvements would be required at Doris Avenue/Victoria Avenue and Teal Club Road/Victoria Avenue. All roadways surrounding the TCSP area (Ventura Road, Patterson Road, Doris Avenue, and Teal Club Road) would be widened to 2030 General Plan Circulation Element standards adjacent to the TCSP site on the seven Teal Club parcels. Where Teal Club Road continues to the west (between Patterson Road and Victoria Avenue), approximately 40 feet of additional right-of-way (approximately 1.5 acres total) would be required for the ultimate future road width along the north side of Teal Club Road (portions of APNs 183-0-070-01, 183-0-060-12, 183-0-060-24, 183-0-060-25, 183-0-060-26, , 183-0-060-32, 183-0-060-39, 183-0-060-45). No additional right-of-way is needed along the south side of Teal Club Road and along the north side of Doris Avenue between Ventura Road and Patterson Road. Along the west side of Patterson Road 1,000 feet north of Teal Club Road and extending to Doris Avenue, approximately 20 feet of land (approximately 0.3 acres) would be needed for additional right-of- way and the ultimate future design width of Patterson Road (portion of APN 183-0-070-01). Please see Section 4.13, *Transportation and Traffic*, for additional information on roadway configurations.



Figure 2-4 Circulation Plan



Potable Water. The City of Oxnard’s “water neutrality” policy requires the TCSP proponent to demonstrate access to water supplies meeting or exceeding projected demand. Under the policy, a development can be water neutral by meeting its projected demand through one or more of following: (1) existing Fox Canyon Groundwater Management Agency (FCGMA) groundwater allocations that are transferred to the city; (2) contributing to increased efficiency by funding water conservation or recycled water retrofit projects; (3) providing additional water supplies; or (4) any combination of these options. The Project Proponents anticipate complying with the premise of the City’s Water Neutrality Policy via transfer of ground water extraction allocations to the City. To provide adequate potable water for the TCSP, the existing agricultural water rights in the TCSP area would be transferred for municipal and industrial uses to the City of Oxnard. The agricultural water rights for each property would be transferred to the City after approval of a Final Tract Map and prior to the start of construction. Existing water mains in Doris Avenue, Ventura Road and Teal Club Road would be expanded to provide potable water service to the entire TCSP area, including extensions along Teal Club Road and Patterson Road and in new streets. The Annexation area south of Teal Club Road would also be required to transfer any existing water rights to the City with Annexation.

Recycled Water. All TCSP development water needs for which recycled water use is appropriate would be connected to the City’s Ventura Road recycled water distribution pipeline. Recycled water would be used, at a minimum, for all landscape irrigation.

Development of the TCSP and the additional annexation area south of Teal Club Road was included in the City’s long range 2010 Urban Water Management Plan (UWMP). Any potable water required beyond that anticipated by the 2010 UWMP, as subsequently updated in the 2015 and 2020 UWMP’s, must be provided by the project proponent or subsequent owners of interest by permanently offsetting other potable water users, or in a manner acceptable to the Director of Public Works.

Wastewater. The City would provide sanitary sewer treatment service for all development. All existing and proposed wastewater lines would connect to the Oxnard Wastewater Treatment Plant on Perkins Road. The east side of the TCSP area would connect to the Redwood trunk line in Ventura Road, the TCSP west side would connect to the trunk line in Victoria Avenue. The exact configuration of the sewage collection system for the project would be determined at the time subsequent tract maps and projects are reviewed and approved.

Drainage. Stormwater from the on-site agricultural fields currently drains to the west and south from a manmade channel along the southern boundaries of the TCSP area. Conceptually, the area would generally drain into new storm drains within Teal Club Road and Patterson Road, with additional stormwater management provided by the proposed retention and on-site infiltration areas shown on Figure 2-3 as “stormwater treatment” areas. The precise configuration of the drainage system would be determined with the review and approval of each phase of the TCSP. All facilities within the TCSP area would be funded, permitted, and maintained by a Master Property Association, Community Facilities District, or other private entity as approved by the City.



2.5.2 Additional Parcels Proposed for Annexation

The additional nine parcels (11.4 acres combined) to be Annexed south of Teal Club Road are currently characterized by a mix of vacant land and existing small residential and industrial developments. Annexation would result in a more logical City boundary so as not to create an unincorporated “island.” These parcels are currently located in a “cut-out” shape that forms an irregular boundary line. Upon annexation, these nine parcels would be zoned Light Manufacturing (M-1) by the City of Oxnard. The purpose and intent of the M-1 Zone district is described in the City Code in Section 16-160 as follows:

“M-1 Light (Light Manufacturing Zone). The purpose of the M-1 Zone is to provide areas for manufacturing and related service uses and activities where the principal activity occurs within a building, but also permits outdoor assembly, fabrication, public services, and storage that conform to the development and performance standards of this chapter, and provide areas suitable for adult businesses. Industrial uses in this zone shall be limited to those that conduct fabrication, assembly, or land processing of materials (including agricultural produce) primarily within a building. The development and performance standards of this chapter limit the creation of smoke, gas, odor, dust, sound, and vibration that might be detrimental to health, safety, and welfare to protect any adjoining uses. Wholesale and retail sales and services related to principal uses are permitted. Limited outdoor storage associated with a primary use may be permitted.”

According to the City of Oxnard City Code (OCC), maximum building heights in the M-1 zone are 55 feet (OCC Section 16-231, although airport-related height restrictions may apply, reducing this in practice for the TCSP area and nine additional parcels to be annexed). Also, according to the OCC, the maximum lot coverage is 70% (OCC Section 16-164). The existing residential uses would not be conforming because residential uses are not encouraged by the Oxnard Airport Comprehensive Land Use Plan in this proximity to runways.

Although no changes are proposed on any of these parcels, after Annexation the property owners would have the option of submitting applications to develop their properties with the uses and at the densities allowed in the City’s zoning regulations for the M-1 Zone District. City permitted uses for the M-1 District are listed in OCC Section 16-163 and include manufacturing facilities, machine shops, assembly and production facilities, warehouses, automobile, aircraft or boat assembly or repair, and research and development operations, among others. All uses, with the exception of parking, must be conducted within an enclosed building unless otherwise approved by a Special Use Permit. Pursuant to OCC Section 16-168, “Obnoxious industrial uses, which adversely affect the environment or which exhibit an unusual degree of hazard,” are expressly prohibited in the M-1 Zone. Pursuant to Section 16-168:

Land or buildings shall not be used or occupied in any manner so as to create any dangerous, noxious, injurious, or otherwise objectionable fire, explosion or other hazard; noise or vibration; smoke, dust, odor, or other form of air pollution; electrical disturbance; glare; liquid or solid refuse or wastes; or other dangerous or objectionable substance, condition or element in such a manner or such amount as to adversely affect the environment or surrounding community.



Since future development is anticipated at some point, this EIR assumes that the entire area would eventually be developed. Based on the M-1 zone standard of 70% maximum lot coverage and the area of the nine parcels (11.4 acres, or 496,584 square feet), the maximum potential buildout would be 347,608 square feet. For purposes of this EIR, assumed buildout would be half manufacturing space (173,804 square feet) and half warehouse space (173,804 square feet).

2.5.3 Development Phasing and Timing

To prepare the TCSP site, the existing structures (residences, barns, and other agricultural accessory buildings) and crops would be removed. The TCSP area would be graded to raise and adjust the topography as needed for each Planning Area to accommodate development. Development is planned in two phases (see Figure 2-5). Phase 1 includes development of property owned by the Borchard Family Interests, which consists of approximately 91.83 acres of the 149.72-acre TCSP area. Grading and improvements to Phase 1 would begin in 2022 and construction of homes would begin in 2023 for each of the Planning Areas within Phase 1.

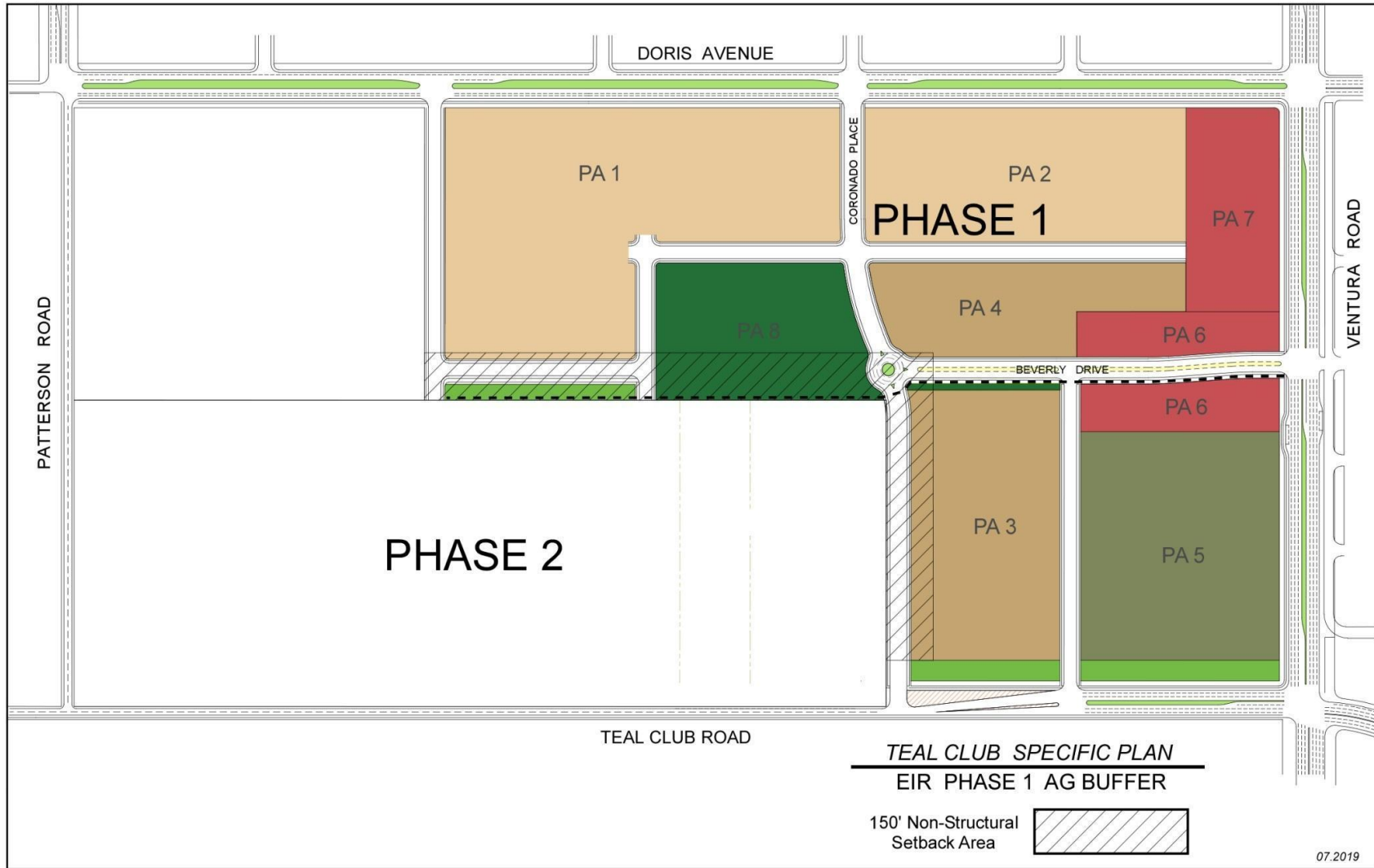
Phase 2 includes the remainder of the proposed TCSP area owned by three other parties. As shown in Figure 2-5, Phase 1 development of the TCSP includes the majority of public benefit amenities, including 6.5 acres of the 10-acre City Community Park and the commercial/retail/office urban village center. Table 2-4 summarizes proposed project phasing.

**Table 2-4
Proposed Project Phasing**

Teal Club Specific Plan		
Phase 1 Planning Area (completion assumed by 2023):		
<i>PHASE:</i>	<i>Planning Areas (PA#)</i>	<i># of units/ commercial square feet (sf)/ # acres</i>
1A	PA 1-4 (attached and detached residential) PA 6 & 7 (commercial/ mixed use, urban village commercial)	83 units 60,000 sf
1B	PA 8 (Community Park)	6.5 acres
1C	PA 5 (attached residential)	240 units
<i>Subtotal</i>	<i>723 units; 118,000 gsf</i>	
Phase 2 Planning Area (completion assumed by 2025):		
2A	PA 9 (Community Park)	3.5 acres
2B	PA 10 (Community Park)	7.38 acres
2C	PA 11 & 12 (attached residential/apartments)	267 units
2D	PA 13 & 14 (business research park)	132,000 gsf
2E	PA 9 (Community Park)	3.5 acres
<i>Subtotal</i>	<i>267 units and 132,000 gsf of business research park</i>	
TCSP Total	990 units and 250,000 gsf of non-residential space	
Development of the Nine Parcels south of Teal Club Road (completion assumed by 2030):		
<i>Subtotal: 173,804 gsf manufacturing space, 173,804 gsf warehouse space</i>		



Figure 2-5: Proposed Specific Plan Phasing Plan



Phase 1 development (1 owner, 91.8 acres):

- 220 units – *Low-Medium Density Residential (avg. 8-12 dwelling units per acre)*
- 233 units – *Medium Density Residential (avg. 13-18 dwelling units per acre)*
- 240 units – *High Density Residential (avg. 19-30 dwelling units per acre)*
- 30 units – *Mixed Use Residential*
- 8.78 acres – *Urban Village Mixed Use & Retail Commercial*
- 6.5 acres – *Community Park, phase 1*

Phase 2 development (multiple owners, 57.9 acres):

- 167 units – *Low-Medium Density Residential (avg. 8-12 dwelling units per acre)*
- 100 units – *High Density Residential (avg. 19-30 dwelling units per acre)*
- 10.88 acres – *Community Park, phase 2*
- 9.11 acres – *Business/Research Park*

Phase 1 development would also provide interim agricultural buffer setbacks to allow Phase 2 owners to continue farming indefinitely, as well as all internal roadway circulation needed to serve Phase 1 (see Figure 2-5). The proposed buffers would be either 300 feet, or 150 feet with a double row of appropriate trees (windrows). Figure 2-5 shows a 150-foot setback. All proposed Phase 1 roads would be built and operable; residences for lots in the Phase 1 area within the 150-foot buffer would not be built until Phase 2 is committed to development. The TCSP document includes detailed diagrams and text to provide for phased implementation.

No development proposals are pending for the additional Annexation area south of Teal Club Road; thus, a schedule cannot be identified for their potential development following Annexation and Pre-zoning. For the purposes of this EIR and for a conservative analysis, development of this area is assumed to occur roughly concurrently with the Phase 2 buildout and to occur by 2030.

2.6 REQUIRED DISCRETIONARY APPROVALS

TCSP adoption and related Annexations, Pre-Zoning, and Annexation and Pre-Zoning of the additional nine parcels south of Teal Club Road would require the following discretionary approvals:

- *Adoption of the Teal Club Specific Plan (City of Oxnard)*
- *Pre-Zoning of the TCSP and additional Annexation area (City of Oxnard)*
- *Approval of a Development Agreement (City of Oxnard)*
- *Annexation Approval (City of Oxnard and LAFCo)*
- *Annexation to the Calleguas Municipal Water District and MWD (LAFCo)*
- *Ventura County Airport Land Use Commission approval (Ventura County)*
- *Approval of Tentative and Final Tract Maps (City of Oxnard)*
- *Detachment from the Ventura County Fire Protection District (LAFCo)*
- *Detachment from the Ventura County Resource Conservation District (LAFCo)*
- *Detachment from Oxnard Drainage District No. 1 (LAFCo)*
- *Detachment from Ventura County Service Area No. 33 (LAFCo)*



The proposed project would involve approval of a Development Agreement (DA) between the City of Oxnard and Phase 1 landowners for the Specific Plan Area. The DA would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

LAFCo, Calleguas Municipal Water District, MWD, and the Ventura County Airport Land Use Commission are responsible CEQA agencies as they will rely on this EIR for their respective actions.

This EIR serves as the environmental review for subsequent discretionary actions associated with development of the project unless changes are proposed that warrant additional environmental review. This EIR may also cover state, regional and/or local government permits that may be required to develop the proposed project, whether or not they are explicitly listed below. Federal, state, and regional agencies that may have jurisdiction over some aspects include (but are not limited to):

- *Fox Canyon Groundwater Management Agency*
- *California Department of Fish and Wildlife*
- *Los Angeles Regional Water Quality Control Board*
- *County of Ventura*



3.0 ENVIRONMENTAL SETTING

This section describes the current environmental conditions on, and in the vicinity of, the Teal Club Specific Plan (TCSP) area and the nine additional parcels to be Annexed. More detailed descriptions of the setting for each environmental issue area can be found in Section 4.0, *Environmental Impact Analysis*.

3.1 REGIONAL SETTING

The City of Oxnard (City) encompasses approximately 26.9 square miles (United States Census Bureau, 2010) and has an estimated population of 209,879 residents (California Department of Finance, May 2019). Oxnard is situated roughly midway between Santa Barbara and Los Angeles and is bounded by the Santa Clara River and unincorporated Ventura County to the north, unincorporated County areas to the east, and the City of Port Hueneme and the Pacific Ocean to the south and west. The City of San Buenaventura (Ventura) is located to the northwest across the Santa Clara River and the City of Camarillo is located to the east. Naval Base Ventura County is located at Port Hueneme and Point Mugu, south of the City. Oxnard Airport is located near the western edge of the City of Oxnard.

The City is separated from the City of Camarillo by the Oxnard-Camarillo Greenbelt, which extends north near the City of Ventura and south to the California State Route 1. The City is subject to the Save Open Space and Agricultural Resources (SOAR), a Ventura County program that requires a vote of the people before agricultural land or open space areas can be rezoned for development. As part of SOAR, the City of Oxnard is required to preserve the farmland outside their City Urban Restriction Boundary (CURB).

The City is located on the Oxnard Plain, an alluvial plain that covers over 200 square miles in the western portion of Ventura County. The Oxnard Plain contains fertile soils suitable for year-round farming and is relatively flat with elevations ranging from sea level to about 80 feet above mean sea level. Drainage is generally to the southwest toward the Pacific Ocean. Similar to much of Southern California, Oxnard is located within a seismically active region.

Located adjacent to the Pacific Ocean, Oxnard enjoys a mild climate characterized by cool winters and moderate summers. Ocean breezes cool the region in the summer and warm it in the winter. According to the Western Regional Climate Center, average temperatures range from about 75 degrees F (24 degrees C) in summer to 65 degrees F (18 degrees C) in winter. Annual rainfall averages about 15 inches per year, with most rainfall occurring between November and April, but rainfall may vary significantly from having several years of drought to years with intense rain events that bring an entire year's rainfall in several severe storm events.

3.2 PROJECT SITE SETTING

The TCSP area and nine additional parcels south of Teal Club Road to be Annexed (as defined in Section 2.0, *Project Description*) are located near the central-west area of the City. The TCSP area is located in unincorporated Ventura County, but identified as an anticipated Annexation in the City's 2030 General Plan. The TCSP area is bordered by Ventura Road to the east, Teal



Club Road to the south, Patterson Road and a proposed future site for Oxnard School District educational facilities to the west, and Doris Avenue to the north. An additional 11.4 acres immediately south of the TCSP area on the south side of Teal Club Road is included as part of the proposed project (but is not part of the TCSP area). An aerial view of the project area is shown on Figure 2-2 in Section 2.0, *Project Description*. Existing conditions in the project area are shown in photographs 1 through 6 on Figure 4.1-1a through c in Section 4.1, *Aesthetics*.

Major arterials providing immediate access to the regional roadway system include Ventura Road, Wooley Road, and Victoria Avenue. Fifth Street, south of the Oxnard Airport, is designated as a secondary arterial. Teal Club Road, Patterson Road, and Doris Avenue are designated as local arterials on the City's Circulation Diagram (City of Oxnard, October 2011). Regional access to the site is provided by the Ventura Freeway (U.S. Highway 101) and the Pacific Coast Highway (State Route 1).

The TCSP area is almost entirely in active agricultural use with row crops and several agricultural buildings, the largest being a barn and greenhouses along Teal Club Road. The TCSP area includes two single-family residences, one just east of the barn and one in the northeastern corner of the TCSP area at Doris Avenue and North Ventura Road. The additional parcels to be Annexed south of Teal Club Road are a mix of vacant land (the westernmost three parcels) and residential and industrial development (the easternmost six parcels). The City's 2030 General Plan land use designations for the TCSP and additional parcels south of Teal Club Road areas are listed in Table 2-2 in Section 2.0, *Project Description*. Additional setting information is included in each environmental topic subsection in Section 4.0, *Environmental Impact Analysis*.

Land uses in the vicinity of the TCSP area and nine additional parcels to be Annexed include single family homes in the Cabrillo residential neighborhood to the north; the Fremont Square Shopping Center to the northeast; the Fremont North and Fremont South residential neighborhoods to the east; a small shopping center, farmland, a California National Guard property, and the Oxnard Adult School to the southeast; the Oxnard Airport to the south; and extensive farmland to the west.

3.3 CUMULATIVE PROJECTS

CEQA defines cumulative impacts as two or more individual actions that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impacts analysis provides a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

The cumulative impacts analyses in this EIR are based on the City's 2030 General Plan, adopted in October 2011, and its Draft Program Environmental Impact Report (DPEIR) (February 2009, recirculated in November 2009, and certified in October 2011). The 2030 General Plan accommodates a population between 238,000 to 286,000 people by 2030, depending on household size and other demographic factors. This would be an increase of between 34,355 and 82,355



persons over the City's 2014 population estimate of 203,645 persons (California Department of Finance, May 2014). The 2030 General Plan assumes annexation and full development of the TCSP area and the additional nine parcels south of Teal Club Road.

The project area is located geographically near the central-west portion of the City; however, cumulative development is spread throughout the City. Some cumulative impacts are not necessarily significant in relation to development that occurs further from the proposed project. For example, aesthetic and noise impacts associated with this project are not likely to be detected in the southern area of the City. Selected cumulative impact discussions rely on a smaller geographic area: these are noted as appropriate within the cumulative impact discussion for each environmental topic subsection in Section 4.0, *Environmental Impact Analysis*. Unless otherwise noted, cumulative development includes all development within the City anticipated by the 2030 General Plan.



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4.0 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the possible environmental effects of the proposed project for the specific issue areas that were identified by the City, expert consultation, and NOP responses as having the potential to experience significant impacts. “Significant effect” is defined by the *CEQA Guidelines* §15382 as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.”

The assessment of each issue area begins with an italicized introduction that summarizes the environmental effects considered for that issue area. This is followed by the setting and impact analysis. Within the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the City, other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. Impacts were evaluated based upon the City’s 2017 *CEQA Guidelines* and/or Appendix G of the *State CEQA Guidelines* where appropriate. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text, with the discussion of the effect and its significance following. Each bolded effect listing also contains a statement of the significance determination for the environmental effect as follows:

Class I, Significant and Unavoidable: An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the State CEQA Guidelines.

Class II, Significant but Mitigable: An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings to be made under §15091 of the State CEQA Guidelines.

Class III, Less than Significant: An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.

Class IV, Beneficial: An effect that would reduce existing environmental problems or hazards.

Following each environmental effect discussion is a listing of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measures. In those cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed as a residual effect. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other future development in the area.



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4.1 AESTHETICS

This section analyzes the proposed project's impacts to aesthetics, including the existing visual character of the TCSP area and additional Annexation area and whether development associated with the TCSP and Annexations would adversely affect surrounding land uses due to light or glare.

4.1.1 Setting

a. Visual Character. The 149.72-acre TCSP area is almost entirely occupied by agricultural row crops with several agricultural accessory buildings, the largest being a barn and several greenhouses in the central-southern portion of the property along Teal Club Road. The TCSP area also includes two single-family residences, one just east of the barn and one in the northeastern corner of the site at Doris Avenue and North Ventura Road. The 11.4 acres of additional Annexation parcels south of Teal Club Road consist of: 1) vacant land on the westernmost three parcels, 2) six single-story residences fronting Teal Club Road, and 3) commercial or industrial uses located behind them on the easternmost six parcels.

The TCSP area is located near the geographic center of the City. The topography of west Ventura County is largely a flat alluvial plain and, in general, the City and surrounding areas are relatively flat and characterized by low-rise development. The City's three tallest structures (6-story, 14-story and 21-story buildings), are located near the 101 Freeway, 1.7 miles to the northeast of the TCSP area. Agricultural fields are located within the TCSP area and to its west and northwest in an area designated as the Ventura-Oxnard Greenbelt (the TCSP area is not officially part of the greenbelt, which is bounded at its eastern edge by Patterson Road). A mature Eucalyptus windrow (a line of trees designed to block wind) is located along Ventura Road and is the only major vertical element in the immediate area. One and two-story detached single-family housing neighborhoods with scattered trees and landscaping are located to the north and east of the TCSP area.

A community commercial center is located on the northeast corner of Ventura Road and Doris Avenue, and smaller commercial centers are located at the southeast corner of the same intersection and at the southeast corner of Ventura Road and West Second Street. These three centers consist of one story commercial buildings with landscaping and parking areas between the street and the buildings. Small scale commercial and light industrial uses are located along the south side of Teal Club Road within and adjacent to the TCSP and Annexation area, along with several single-family residential properties and vacant lots. The runway of the Oxnard Airport is located further south with commercial, office, and airport-related uses located only on the south side of the airport (along the north side of West Fifth Street), and are generally one and two story buildings but also include hangars and the control tower.

Several schools and parks are located near the project area: Ritchen Elementary, about 1/3 mile to the north; Fremont Intermediate School, about 1/3 mile to the northeast; Oxnard Adult School, about 0.2 miles to the southeast; and Southwest Community Park, about 0.4 miles to the south. In addition, new elementary and middle schools are currently proposed at a site that abuts the northwest boundary of the project site. Major multi-lane roads near the project area include Ventura Road, West Fifth Street, and North Patterson Road. Figure 2-2 in Section 2.0,



Project Description, provides an aerial view of the TCSP area and the additional Annexation area. Views of the project area and views from the project area into surrounding areas are shown on figures 4.1-1a through 4.1-1c.

b. Views and Scenic Resources. The most prominent public views of the TCSP area are from adjacent roads: Ventura Road (through the windrow), Teal Club Road, Patterson Road, and Doris Avenue. Views of the TCSP area and nine additional parcels to be annexed are also available from parts of the Oxnard Airport and from parcels to the south and west of the project area. Partial views of the TCSP area are also visible, although more distantly, from Victoria Avenue, about $\frac{3}{4}$ mile to the west; and Fifth Street, about 1.6 miles to the southwest. Residents that currently have views of the TCSP area are generally limited to those living along the north side of Doris Avenue, along the east side of Ventura Road, and along the south side of Teal Club Road. However, some views are blocked by the windrow and other trees along the boundary of the TCSP area.

The primary visual features of the TCSP area from these roads are the Ventura Road windrow and other vegetation (including a smaller windrow) surrounding the single family residence in the northeastern corner (see Figure 4.1-1c above). The windrows are somewhat irregular and the trees are in various states of health and stature, resulting in moderate aesthetic quality. Otherwise, the TCSP area is flat and open. The 11.4-acre additional Annexation area south of Teal Club Road consists of a mix of vacant land, one-story residences, and commercial and industrial uses. Farmland and the windrow are considered to be the primary scenic resources within the project area.

Five roads adjacent to or near the project site are (Ventura Road, Patterson Road, Doris Avenue, Victoria Avenue, and Fifth Street) identified in the Oxnard 2030 General Plan as routes within the City's Scenic Highways and Roadways with potential view corridors have views of the of the project area and expansive views through the TCSP area over active farmland towards the Pacific Ocean and Channel Islands (west) and the Los Padres mountain range (north). Views of the Los Padres Mountains are available from the following roadways immediately surrounding the TCSP area: Ventura Road to the east, Patterson Road to the west, and Doris Avenue to the north. These views are also visible, although more distantly, from Victoria Avenue, about $\frac{3}{4}$ mile to the west; and Fifth Street, about 1.6 miles to the southwest. Teal Club Road, which parallels the southern boundary of the TCSP area and the northern boundary of the nine additional parcels to be Annexed, has views of the site and of the mountains, but this road is not identified in the Oxnard 2030 General Plan as within the City's Scenic Highway System.

Figure 4.1-1a Views of TCSP Area



Photo 1: View of existing row crops from Teal Club Road looking north.



Photo 2: View of existing single-family residence on north side of Teal Club Road.

Figure 4.1-1b Views from Plan Area



Photo 3: View of single-family housing north of the Teal Club Specific Plan Area.



Photo 4: View of shopping center at intersection of Ventura Road and Doris Avenue.



Figure 4.1-1c Views of Full and Partial Windrows



Photo 5: View of Plan Area looking northwest from Ventura Road near its intersection with Teal Club Road.



Photo 6: View of partial windrow on Doris Area from Doris Avenue looking southeast.



c. Light and Glare. The TCSP area currently has low light levels, being almost entirely in agricultural production. The 11.4 additional Annexation acres south of Teal Club Road, which consists of a mix of vacant land, single story residences, and commercial or industrial uses, have somewhat higher light levels but still have light levels that would be consistent with a semi-rural area due to the relatively low intensity of development. Sources of light in the project area's immediate surroundings include street lighting on the north side of Doris Avenue and on the east side of Ventura Road, but not on the other surrounding roads; several lit commercial signs in the commercial buildings in the immediate vicinity; and some exterior building lighting and security lighting in other surrounding uses. Because of the limited amount and relatively low profile of existing development, interior lighting does not contribute substantially to nighttime light.

Because of the small amount of structures within the TCSP area and additional Annexation area, and their low visibility from surrounding areas and lack of high glare building materials, daytime glare levels from the project area are also relatively low. Land uses in the vicinity that would be most sensitive to night lighting are immediately surrounding residential areas on the north side of Doris Avenue, the east side of Ventura Road, and the south side of Teal Club Road.

d. Shade and Shadow Conditions. As indicated above, the TCSP area, additional Annexation area, and surrounding area are developed primarily with agricultural row crops and one- to two-story buildings. At these heights, morning and afternoon winter shadows do not extend offsite and do not significantly shade any on or off-site residential structures.

e. Regulatory Setting. The City's 2030 General Plan includes a number of policies pertaining to aesthetics and visual resources in the Community Development, Infrastructure and Community Services, and Environmental Resources chapters. As discussed above, the 2030 General Plan identifies five roads (Ventura Road, Patterson Road, Doris Avenue, Victoria Avenue, and Fifth Street) as routes within the City's Scenic Highway System.

Community Development (Chapter 3). This chapter replaced and augments the Growth Management, Land Use, Economic Development, and Community Design elements of the 2020 General Plan. It lays out a basic development framework for the City, including definition of Oxnard's City Urban Restriction Boundary (CURB), identification and mapping of the City's various planning areas, and definition of land use designations, standards, goals, and policies. The following policies in this element are among those most relevant to the aesthetic resources impact discussion:

- CD-1.7** *Compact Development. Promote the use of development patterns that are more compactly built and use space in an efficient aesthetic manner as part of the community vision.*

- CD-4.5** *Commercial Signage. Require that signage in commercial development improve, rather than detract, from the quality of the surrounding neighborhood.*

- CD-7.2** *Urban Village Compatibility Guidelines. Develop Urban Village Guidelines that ensure that each urban village area provides appropriate*



transitional features with the surrounding area, and that each urban village incorporates uses compatible with existing uses.

- 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-9.3** ***Gateway Enhancement.*** *Designate major entryways as gateways into the City. The City shall use landscaping, decorative lighting, signage and/or other streetscape design techniques to enhance the City's identity, sense of place, and provide visual emphasis to the streetscapes into the City.*
- 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.*
- CD-10.1** ***Human-Scale Development.*** *In the evaluation of development proposals, require urban development on a human scale, by emphasizing the pedestrian experience over the movement and storage of vehicles.*
- CD-10.2** ***Neighborhood Themes.*** *In the evaluation of development proposals, require neighborhood themes and principles of design, such as neotraditional town planning, which include central parks, schools, and community and commercial facilities, strong pedestrian orientation and de-emphasis of automobile related elements in new development projects.*
- 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.*

Infrastructure and Community Services (Chapter 4). This chapter replaced and augments the Circulation, Public Facilities, and Open Space elements of the 2020 General Plan. It describes Oxnard's existing infrastructure and community services facilities (such as public and private utilities; roads and other transportation infrastructure; police and fire services; and public facilities such schools, parks, and libraries), and also includes goals and policies for their future development. The following policies are relevant to the aesthetic resources impact discussion:



- ICS-2.12** **Gateway Enhancements.** Continue to enhance gateways (including but not limited to Ventura Road, Oxnard Boulevard, Vineyard Avenue, Rose Avenue, Rice Avenue, Del Norte Boulevard, Highway-101, Highway 1, Fifth Street, Channel Islands Boulevard, Pleasant Valley Road, Harbor Boulevard, Victoria Avenue, and Hueneme Road).
- 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-23.7** **Park Signage.** Utilize uniform signage, and employ other unifying design features to integrate parks and other municipal facilities and encourage use by residents.

Environmental Resources Element Policies (Chapter 5). This chapter presents a vision for the City to increase its responsible stewardship of the environment in full compliance with state and Federal laws, and strive to exceed in a position of leadership in these areas. The following policies in this Element are relevant to the aesthetic resources impact discussion:

- ER-1.1** **Protect Oxnard's Natural and Cultural Resources.** Protect the City's natural resource areas, fish and wildlife habitat, scenic areas, open space 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.
- 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.
- ER-6.6** **New Development Private Open Space.** Ensure that new development incorporates open space areas that provide community and neighborhood identity, private quality exterior private open space for each housing unit, and minimize conflicting land uses and noise generators.



- ER-7.1** ***Medians and Parkways.** Ensure that major arterials include landscaped medians and parkways.*
- ER-7.2** ***Design of Sound or Zone Walls.** When sound or zone walls are used, ensure that they are visually interesting and well landscaped.*
- 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.*

Oxnard City Code. The Oxnard City Code (OCC) contains regulations governing the physical appearance of development within the City. Most of these are contained within Chapter 16: *Zoning Code*. For example, Article III , *Zones, Uses, and Requirements*, contains regulations pertaining to each zoning designation within the City, including (among others) permitted uses and regulations relating to architectural standards, minimum lot areas, building sizes, height limits, and setbacks. These regulations are required to be consistent with the goals and policies of the 2030 General Plan, and have the general effect of setting the basic parameters for the physical form of development within the City.

Article IV of the Zoning Code, *Standards for All Zones*, contains various regulations applicable to all property in the City. For example, Section 16-320 of the OCC requires the following regarding lighting:

Lighting within physical limits of the area required to be lighted shall not exceed seven footcandles, nor be less than one footcandle at any point. A light source shall not shine upon, or illuminate directly any surface other than the area required to be lighted. No lighting shall be of a type or in a location that constitutes a hazard to vehicular traffic, either on private property or on abutting streets. The height of light standards shall not exceed 26 feet. To prevent damage from automobiles, standards shall be mounted on reinforced concrete pedestals or otherwise protected.

Oxnard Design Review Process & Guidelines. The City of Oxnard Attention to Detail Design Review Process & Guidelines, adopted in 1992, outlines the design review process for projects in Oxnard. The document also provides design guidelines, including guidelines related to building design, site planning, landscaping, signs, and maintenance. Some of guidelines relevant to the proposed project are below:

Building and Design Principal 1: Different structures and parts of structures should “fit” together. When new construction is proposed where structures already existing, the new should harmonize with the old, in most cases.

Building and Design Principal 2: An individual building should be similar in scale to the buildings near it; and parts of the building should be appropriate in scale for the size and style of the building.



Site Planning 1: Generally a designer should plan a project to fit a site's natural conditions rather than altering a site to accommodate a stock building plan.

Site Planning 5: Exterior lighting, when used, should be subdued. It should enhance and accept building design and landscaping, as well as provide safety and security. It must not create glare for occupants on neighboring properties or on adjacent streets.

Oxnard Landscape Standards. The City of Oxnard Landscape Standards, adopted in 1986, are intended to assure that landscaping meets the following criteria:

1. A high level of landscape quality
2. An abundant quantity of attractive and colorful plants
3. Conservation of water by use of drought tolerant plants and water saving irrigation systems
4. Labor saving and low maintenance landscape designs

The Landscape Standards require installation of landscaping for all residential, commercial, and industrial properties. In addition, the Standards describe the type and detail of landscape plans required for new projects, including plans prepared by a registered Landscape Architect and specifications for landscaping and irrigation.

4.1.2 Impact Analysis

a. Methodology and Significance Thresholds. The assessment of aesthetic impacts involves qualitative analysis that is inherently subjective in nature. Different viewers react to viewsheds and aesthetic conditions differently. This evaluation measures the existing visual resource against the proposed action, analyzing the nature of the anticipated change. The TCSP area and additional Annexation area was observed and photographically documented, as was the surrounding area, to assist in the analysis. The City's adopted policies regarding aesthetic resources, cited above, are also considered a guide in the assessment of the value of aesthetic resources; project consistency with these policies is discussed in Section 4.8, *Land Use and Planning*.

According to the City of Oxnard 2017 *CEQA Guidelines*, an impact is considered significant if the project would:

1. *Have a substantial adverse effect on a scenic vista such as an ocean or mountain view from an important view corridor or location as identified in the 2030 General Plan or other City planning document;*
2. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state-designated scenic highway, or route identified as scenic by the County of Ventura or City of Oxnard;*
3. *Substantially degrade the existing visual character or quality 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 2030 General Plan or other City planning documents;*



4. *Add to or compound an existing negative visual character associated with the project site; or,*
5. *Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.*

The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.1-1 lists the thresholds under consideration in the aesthetics analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.1-1
 Summary of Aesthetics Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Have a substantial adverse effect on a scenic vista such as an ocean or mountain view from an important view corridor or location as identified in the 2030 General Plan or other City planning document?			X	
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state-designated scenic highway, or route identified as scenic by the County of Ventura or City of Oxnard?		X		
3. Substantially degrade the existing visual character or quality 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 2030 General Plan or other City planning documents?		X		
4. Add to or compound an existing negative visual character associated with the project site?		X		
5. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?			X	

Impact AES-1 Scenic vistas, including views of the project area, as well as vistas of the mountains to the north and the Santa Monica Mountains to the east, would be partially blocked from certain public roads by buildout of the TCSP area, including five roads identified as view corridors in the City’s 2030 General Plan. However, given the limited extent to which the proposed project would affect scenic vistas, required buffers along scenic corridors, and the fact that views of the elements of these vistas, such as distant mountains and nearby agricultural lands,



are readily available from nearby areas, this would be a Class III, less than significant, impact.

As discussed above, the development envisioned under the proposed TCSP and additional annexations would be visible from a number of roads in the vicinity of the project area. As illustrated in Figure 4.1-1a, mountain views from surrounding areas towards the east could be affected by the project.

Five roads (Ventura Road, Patterson Road, Doris Avenue, Victoria Avenue, and Fifth Street) identified in the Oxnard 2030 General Plan as routes within the City's Scenic Highway System with potential view corridors have views of the project area and expansive views through the TCSP area over active farmland towards the Pacific Ocean and Channel Islands (west) and the Los Padres mountain range (north). Views of the Los Padres Mountains are available from the following roadways immediately surrounding the TCSP area: Ventura Road to the east, Patterson Road to the west, and Doris Avenue to the north. These views are also visible, although more distantly, from Victoria Avenue, about $\frac{3}{4}$ mile to the west; and Fifth Street, about 1.6 miles to the southwest. Teal Club Road, which parallels the southern boundary of the TCSP area and the northern boundary of the nine additional parcels to be Annexed has views of the site and of the mountains, but the Oxnard 2030 General Plan does not identify this road as part of the City's Scenic Highway System.

Views of the mountains northward and westward through the TCSP area from Ventura Road are currently blocked by the windrow along the eastern site boundary, and would not be further blocked by the proposed project. The existing views towards the mountains north from Ventura Road would not be through the TCSP area, and would thus not be affected by the project. Views of the mountains to the northwest from Patterson Road would not be through the TCSP area and would not be blocked by the proposed project. Views of the Santa Monica Mountains to the east from Patterson Road may be fully or partially blocked by development in the TCSP area, although the immediate foreground of views from this location would be developed with a park, which may provide enough unobstructed space for this view to remain visible from this location. Views of the Santa Monica Mountains to the southwest from Doris Avenue would be blocked by low-medium density residential uses proposed under the TCSP along the south side of Doris Avenue. Views of the mountains from Victoria Avenue and Fifth Street would not be blocked by TCSP area development because of the distance to the TCSP area from these locations, which would make the buildings constructed under the proposed project appear as small, low-profile elements of the view. In addition, consistent with General Plan Policy CD-9.4, a landscaped buffer corridor of at least 30 feet would be required along designated scenic corridors. This buffer would preserve views from the public right-of-way. The TCSP area is part of the scenic vista of agricultural lands in the central-west part of Oxnard. Because implementation of the proposed TCSP would involve conversion of agriculture to urban uses, it would affect this scenic vista from certain locations. The most affected locations would be those immediately surrounding the TCSP area, where the TCSP area's agricultural lands are part of the foreground view. For example, views of agricultural lands in the TCSP area are available from Ventura Road, especially from the intersection of Ventura Road and Teal Club Road. Views of agricultural land within the TCSP area from the rest of Ventura Road in this vicinity are largely blocked by the windrow along the eastern site boundary, and the project would not lead to a loss of a scenic vista of agricultural lands from these areas. Doris Avenue and Patterson Road have more unobstructed views of the TCSP area, and would thus lose more



of their view of agricultural areas. However, Patterson Road would retain views of agricultural lands to the west. The TCSP area is viewed only in the distance from Victoria Avenue and Fifth Street, views of other agricultural lands in the foreground of views from these locations would remain, and thus the project would not have a significant impact on scenic vistas of agricultural lands from these locations.

The 11.4 additional acres in the project area but outside the TCSP area proposed for Annexation on the south side of Teal Club Road may eventually be developed with higher-intensity industrial uses following Annexation and Pre-zoning as proposed under the project. These areas are developed with a mix of vacant land, single-story residences, and commercial or industrial uses, and are currently zoned Agricultural Exclusive by Ventura County. As part of the project, they are proposed to be zoned Light Manufacturing (M-1) after Annexation. These areas are not currently part of a scenic vista and scenic vistas are not available from immediately surrounding, publicly accessible areas through them. Article III, Division 14, Section 16-164 of the OCC limits the height of buildings in this zone to 55 feet and the height restricted zone for the Oxnard Airport limits the height to 195 feet above mean sea level. Any further development with urban uses enabled by their Annexation would not tend to directly or indirectly have a substantial adverse effect on a scenic vista.

Given the limited extent to which the proposed project would affect scenic vistas and the fact that views of the elements of these vistas, such as distant mountains and nearby agricultural lands, are readily available from nearby areas, the project would not have a significant adverse impact on scenic vistas.

Mitigation Measures. As described above, while the project would partially block scenic vistas, the project would not have a significant adverse impact on scenic vistas; therefore no mitigation is necessary.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact AES-2 Scenic resources in the project area consist of farmland and tree windrows along the eastern boundary of the project area. These resources help define the project area's visual character and quality. Implementation of the proposed project would replace these visual resources with urban development. Therefore, the project would both eliminate scenic resources and substantially alter the visual character and quality of the site. However, impacts would be Class II, significant but mitigable.

As cited in Section d. *Regulatory Setting*, Policy ER-6.2 of the Oxnard General Plan identifies windrows and farmland as "major scenic resources" in Oxnard that should be protected and enhanced. Although the TCSP area is surrounded by urbanized uses on three sides, the area itself consists of farmland and does not represent an urbanized visual character. The vast majority of the project area is farmland, and a windrow is located along the eastern boundary. The visual quality of the TCSP area is moderate. Because implementation of the TCSP would develop the entire TCSP area with urban uses, it would eventually eliminate all farmland within the TCSP boundaries. Implementation of the TCSP would also eliminate windrow trees and landscaping trees along the eastern and northeastern boundaries of the TCSP area. While



these scenic resources would be eliminated in the TCSP area, other agricultural lands and windrows are present nearby, such as in the block of land located between Doris Avenue, Victoria Avenue, Gonzales Road, and Patterson Road. Nevertheless, because these scenic resources help define the TCSP area's visual character and quality as actively farmed agricultural land, their loss would substantially alter this visual character and quality.

Implementation of the proposed TCSP would represent a fundamental change in the type, intensity, and scale of development within the TCSP area. Existing agricultural fields, two farm houses, a barn, and greenhouses would be replaced by the complete development of the TCSP area with the range of urban uses described in Section 2.0, *Project Description*. The proposed change from agricultural to urban use would change the visual character of the TCSP area substantially. Community Design Element Policies 14.1 and 14.2 (listed in Section 4.1e, *Regulatory Setting*) require that development proposals and projects undergo a Design Review Process and Development Advisory Committee (DAC) review prior to approval, which would help ensure that the Specific Plan's design guidelines meet the City's aesthetic goals and would not produce an aesthetically offensive development. In addition, proposed landscaping in and at the borders of the TCSP area, including trees such as the ones shown on the project site plan (Figure 2-5 in Section 2.0, *Project Description*) would help offset the loss of windrows and scattered ornamental trees and other existing area landscaping, which is currently minimal because the TCSP area is almost exclusively occupied by low-lying agricultural row crops. Further, the TCSP area is surrounded on three sides by urban development, and its conversion to urban uses would be generally compatible with its surroundings. Nevertheless, because of the magnitude of the proposed changes and the loss of scenic resources as discussed above, changes to the visual character of the TCSP area would be substantial. However, these changes were anticipated in the 2030 General Plan and analyzed in the 2030 General Plan EIR, which concludes that impacts would be less than significant. However, the 2030 General Plan EIR does not specifically analyze impacts related to the loss of agricultural land under the TCSP. Specifically, the loss of the windrows, a primary aesthetic feature of the project area would be a significant visual impact. Adherence to Mitigation Measure AES-2, which would replace existing windrows with new landscaping trees in the proposed linear open space, thereby reducing impacts to visual character of the area to a less than significant level.

The 11.4 additional acres in the project area, but outside the TCSP area proposed for Annexation on the south side of Teal Club Road, which consists of a mix of vacant land, single story residences, and commercial or industrial uses, may eventually be developed with higher-intensity urban uses following their Annexation as proposed under the project. These areas are currently zoned Agricultural Exclusive by Ventura County, but are proposed under the project to be zoned Light Manufacturing (M-1) after Annexation. These areas do not currently contain scenic resources and any further development with urban uses enabled by their Annexation and Pre-Zone would not tend to directly or indirectly have a substantial adverse effect on scenic resources.

While the 11.4 additional acres are zoned for agriculture by the County, they are not currently in agricultural production and do not exhibit an agricultural or primarily rural character. Various provisions in Article III, Division 14, of the OCC, which governs development within the M-1 zone, regulate its physical appearance. For example, Section 16-160 requires the following:



Development standards are required for the purpose of achieving an orderly arrangement of land, buildings and other structures and providing necessary amenities for industry which exhibit attractive and pleasant characteristics. Development standards are designed to achieve compatibility among the variety of operations and activities functioning within the industrial district, to create a desirable working environment for the industrial labor force, and to effect a harmonious relationship with surrounding nonindustrial properties and the community in general.

Division 14 also contains requirements governing lot area and width, building heights, minimum setbacks, and maximum lot coverage. These regulations would help ensure that, although future development after Annexation may gradually change the visual character of the area from its present state to one of greater intensity of development as individual development projects are proposed, such development would not tend to directly or indirectly have a substantial adverse effect on the visual character and quality of these nine parcels.

Mitigation Measures. Mitigation Measure AES-2 is required to address impacts related to loss of scenic resources in the project area. Please see Section 6.0, *Alternatives* for an analysis of the potential impacts of “no project” and reduced project alternatives.

AES-2 Windrows in Project Landscaping. A windrow shall be created throughout the length of the Beverly Drive greenbelt. In addition, in order to reinforce the project’s boundaries, windrows shall be created between the project area and the proposed school project, which abuts the project area, and between the Phase 1 and Phase 2 boundaries. The windrows shall be designed to emulate traditional regional windrows originally planted for farming operations, including spacing of trees and tree species of like stature as determined by the Community Development Director. The windrow plan shall be submitted for review and approval by the Oxnard Planning Department prior to issuance of grading permits or building permits in the TCSP area. The windrows shall be maintained for the life of the project, including necessary irrigation and protection for tree establishment and tree maintenance and replacement to maintain the aesthetic look and tree safety for the life of the project.

Significance After Mitigation. With implementation of Mitigation Measure AES-2, impacts would be less than significant.

Impact AES-3 The proposed project would result in new sources of light and glare in and around the project area. However, these light and glare sources would be regulated by the Oxnard City Code, and would be consistent with the urbanized nature of the project site’s surroundings and the urban land uses envisioned for the site under the City’s 2030 General Plan. This is considered a Class III, *less than significant, impact.*



Lighting. Implementation of the proposed project would increase the development intensity of the project area, and thus introduce into it new sources of light. Potential sources of new nighttime light include light spillover from the windows of residences and businesses, as well as from outdoor security lighting, lighted signs, and streetlights. Although the project area is primarily agricultural in character and has relatively low on-site light levels, it is surrounded on three sides by urban uses with relatively high light levels, the most intensely lit of which is the Fremont Square Shopping Center. The proposed project would substantially increase on-site light levels, and would contribute to a lesser increase in off-site light levels. However, on- and off-site light levels after project implementation would be consistent with the urbanized nature of surrounding areas and with the urban land uses planned for the project area under the City's 2030 General Plan. As discussed in Section 4.1.1e, *Regulatory Setting*, Section 16-320 of the OCC contains various requirements that would help ensure that development under the project would not have negative aesthetic or safety impacts. For these reasons, the project would not have significant adverse effects related to lighting.

Glare. Glare is primarily a daytime phenomenon, caused by sunlight reflecting from structures, roadways, and cars. However, glare can also be created at night by vehicle headlights. Potential sources of glare associated with the proposed project would consist of glazing (windows) and other reflective materials used in the façades of proposed structures, the reflective surfaces of vehicles parked and travelling within and around the project area, and nighttime vehicle headlights. As noted above, the project area is surrounded on three sides by urban uses with numerous existing sources of glare. The project would also be subject to Section 16-320 of the OCC (as shown in Section 4.1.1e, *Regulatory Setting*), which is designed to limit light overspill and off-site lighting impacts. For these reasons, the project would not have significant adverse effects related to lighting.

Mitigation Measures. The proposed project would not have a significant adverse impact related to light and glare; therefore, no mitigation is necessary.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. The proposed project combined with other planned and pending projects near the project area would contribute toward expanding the urban environment of Oxnard, with corresponding changes to the area's visual environment. The City's 2030 General Plan Program EIR (certified in October 2011) considered the potential environmental impacts of buildout of the 2030 General Plan, which would accommodate a population in a range of 238,000 to 286,000 in Oxnard by 2030, depending on household size and other demographic factors. The 2030 General Plan Program EIR concludes that, while this development would have impacts related scenic resources and vistas, visual character, and light and glare, such impacts would be less than significant and would not require mitigation. The land uses proposed under the current proposal make up a part of the total development called for under the 2030 General Plan and were included in the development analyzed in the 2030 General Plan Program EIR. The current proposal is consistent with the development of the project area and other cumulative projects envisioned in the 2030 General Plan and determined in the 2030 General Plan Program EIR to be less than significant. Therefore, although area-specific impacts associated with visual quality and character would occur, project's contribution to cumulative aesthetic impacts in a citywide context would be less than significant with incorporation of project-specific Mitigation Measure AES-2.



4.2 AGRICULTURAL RESOURCES

This section evaluates impacts to agricultural resources from implementation of the proposed TCSP, Annexation of 11.4 acres south of Teal Club Road, and associated widening of Teal Club Road from Patterson Road to Victoria Avenue and Patterson Road between Doris Avenue and Teal Club Road. Both direct impacts associated with the conversion of agricultural land to non-agricultural use and potential indirect impacts to adjacent agricultural operations are discussed.

4.2.1 Setting

a. Regional Agriculture. A Mediterranean climate with mild summer and winter temperatures, low frost occurrence, flat and fertile soil, and an average of about 14 inches of rain per year combine to create high quality and productive agricultural land in the Oxnard plain.

Table 4.2-1 shows the 2017 and 2018 values of major crop groupings in Ventura County. Gross revenue sales of agricultural products in the County increased from approximately \$2.100 billion in 2017 to approximately \$2.103 billion in 2018. The largest increases in crop values from 2017 to 2018 were in the livestock and poultry and vegetable crops groupings. The largest decreases in crop values from 2017 to 2018 were in the nursery stock and sustainable agriculture groupings.

**Table 4.2-1
 Ventura County Annual Agricultural Crop Report**

Crop Grouping	2017 Crop Value	2018 Crop Value
Fruit and Nut Crops	\$1,270,397,000	\$1,272,715,000
Vegetable Crops	\$569,471,000	\$572,631,000
Livestock and Poultry	\$4,578,000	\$5,564,000
Apiary Products	\$3,746,000	\$3,972,000
Nursery Stock	\$197,969,000	\$194,495,000
Cut Flowers	\$49,904,000	\$48,442,000
Field Crops	\$1,552,000	\$3,566,000
Sustainable Agriculture	\$2,272,000	\$1,847,000
Total	\$2,099,889,000	\$2,103,232,000

Source: Ventura County Agricultural Commissioner, Ventura County's 2018 Crop & Livestock Report, July 2019.

Regional Conversion of Farmlands. Conversion of farmlands is the loss of farmlands due to non-agricultural development or land use changes that do not support agricultural production. The California Department of Conservation (DOC) has developed a classification system to categorize the quality of agricultural land resources. The DOC Farmland Mapping and Monitoring Program (FMMP) provides biannual agricultural land conversion information by class for decision makers to use in their planning for the present and future of California's agricultural land resources.

Important Farmlands. The U.S. Soil Conservation Service's Important Farmlands Inventory (IFI) system is used to inventory lands with high agricultural value. This system divides farmland into classes based on productive capability of the land (rather than the mere presence of ideal soil conditions). The important farmlands map identifies five agriculture-



related categories: 1) prime farmland, 2) farmland of statewide importance, 3) unique farmland, 4) farmland of local importance, and 5) grazing land. A description of each of these categories is provided below.

- *Prime Farmland. Prime farmland is land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the most recent mapping date (the most recent map update for the region is 2016).*
- *Farmland of Statewide Importance. 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 drops at some time during the two update cycles prior to the mapping date.*
- *Unique Farmland. Unique farmland is land of lesser quality soils used for the production of the State's leading agricultural crops (i.e., crops of high economic value, such as oranges, olives, avocados, rice, grapes, and cut flowers). This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones of California. The land must have been cultivated at some time during the two update cycles prior to the mapping of 2016.*
- *Farmland of Local Importance. Farmland of local importance to the local agricultural economy, as determined by each County's Board of Supervisors and a local advisory committee. In Ventura County, farmland of local importance has been identified as soils that are listed as prime farmland or farmlands of statewide importance that are not irrigated, and soils growing dryland crops – beans, grain, dryland walnuts, and dryland apricots.*
- *Grazing Land. Grazing land is land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for this category is 40 acres.*

The conversion of farmland in Ventura County from 2014 to 2016 (the most recent information available) is based on information from the FMMP and is illustrated in Table 4.2-2 on the following page.

As indicated in Table 4.2-2, the County experienced a 0.1% (acres) increase of important farmland and 0.03% (65 acre) increase in grazing land from the period of 2014 to 2016 (Department of Conservation, July 2016).



**Table 4.2-2
 Important Farmland Conversion in Ventura County**

Importance Category	Acreage Inventoried		Acreage Change (+/-)	% Change (+/-)
	2014	2016		
Prime Farmland	41,143	40,976	-167	-0.4
Farmland of Statewide Importance	33,045	32,992	-53	-0.2
Unique Farmland	28,699	28,950	+251	+0.9
Farmland of Local Importance	15,560	15,590	+30	+0.2
Important Farmland Subtotal	118,447	118,508	+61	+0.1
Grazing Land	197,794	197,859	+65	+0.03
Agricultural Land Total	316,241	316,367	+126	+0.04

Source: California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Ventura County 2014-2016 Land Use Conversion, July 2016.

b. TCSP Area Agricultural Uses. The 149.72-acre TCSP portion of the project area is in active agricultural use and is currently cultivated with row crops. The Annexation parcels south of Teal Club Road are a mix of vacant land (the westernmost three parcels) and residential and industrial development (the easternmost six parcels). Lands west of Patterson Road also currently support agricultural production (see Figure 4.2-1).

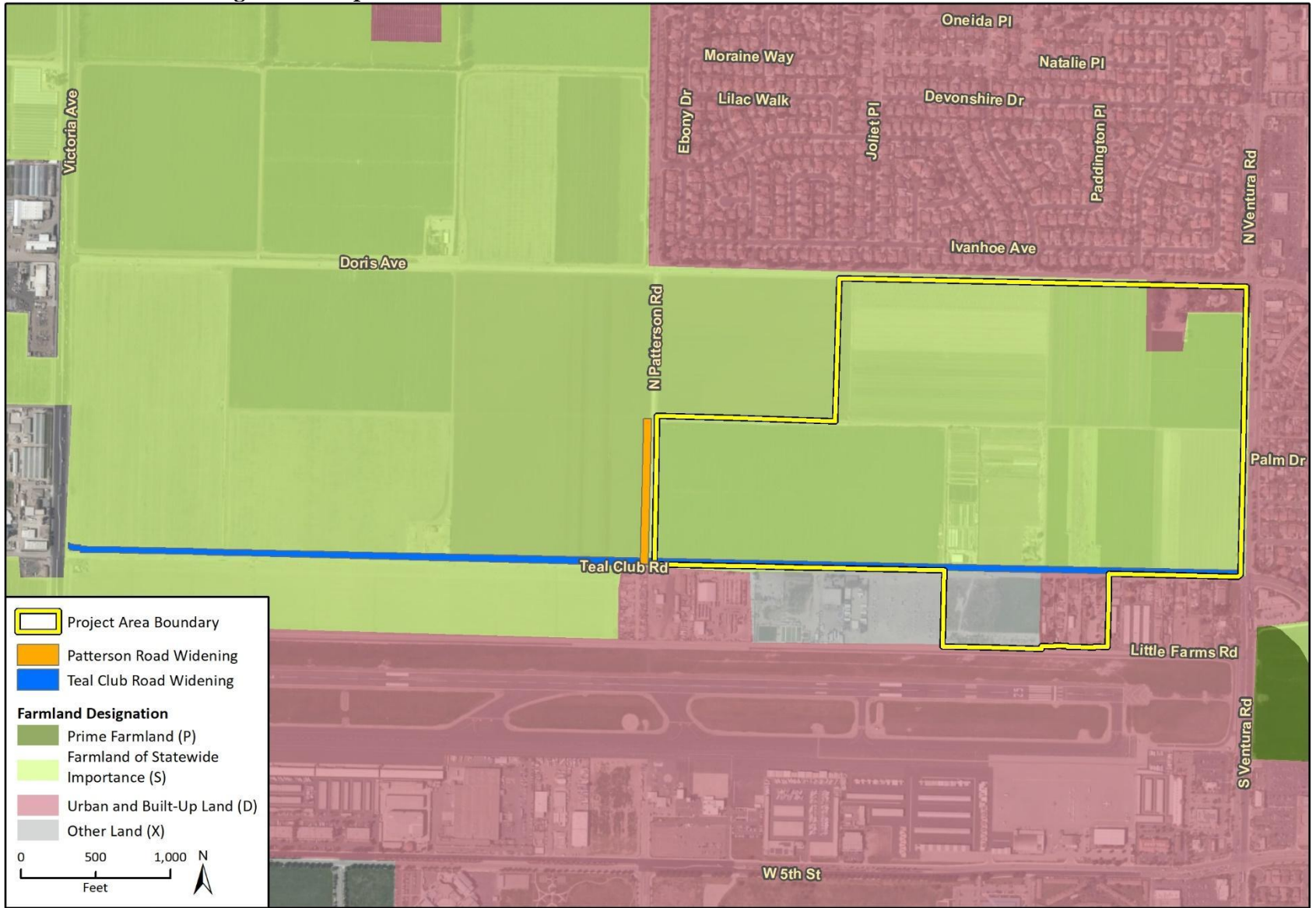
Figure 4.2-1 shows farmland designations in the TCSP area and the surrounding area. As described in Table 4.2-3, almost all of the agricultural land in the TCSP area (approximately 145.4 acres) is classified as Farmland of Statewide Importance. An approximately 4.3-acre area in the northeast corner of the TCSP area is designated as “urban and built up land.” The additional annexation area is designated as “urban and built-up land” and “other land.” The TCSP area, plus the area that would be affected by the associated widening of Teal Club Road from Patterson Road to Victoria Avenue and Patterson Road adjacent to the TCSP area, includes approximately 149.5 acres of Farmland of Statewide Importance. Therefore, there are about 149.5 overall acres of Farmland of Statewide Importance in the project area and road widening areas.

**Table 4.2-3
 Project Area Farmland Designations**

	Farmland of Statewide Importance	Urban and Built-Up Land	Other Land
TCSP Area	145.4	4.3	0
Additional Annexation Area	0	5.0	6.4
Road Widening Area	4.1	0	0
Total	149.5	9.3	6.4



Figure 4.2-1 Farmland Designation Map



Imagery provided by Microsoft Bing and its licensors © 2020.
 Farmland data provided by State of California DOC Farmland Mapping and Monitoring Program 2016. Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc

Fig 4.2-1 Farmland Designation Map

c. Soil Characteristics. Agricultural classifications of the soil type found within the TCSP area were analyzed based on their Capability Class, California Revised Storie Index grade, and Natural Resource Conservation Service (NRCS) farmland designation. Capability Classes provide insight into the suitability of a soil for field crop uses based on factors that include texture, erosion, wetness, permeability, and fertility. As defined in Government Code Section 51201 (California Land Conservation Act of 1965), Capability Class 1 and Class 2 soils qualify as prime soils. The Storie Index is a soil rating based on soil properties that govern a soil's potential for cultivated agriculture in California. The Storie Index assesses the productivity of a soil from the following four characteristics: Factor A, degree of soil profile development; Factor B, texture of the surface layer; Factor C, slope; and Factor X, manageable features, including drainage, micro relief, fertility, acidity, erosion, and salt content. As defined in Government Code Section 51201 (California Land Conservation Act of 1965), soils with a Storie Index from 80 to 100 qualify as prime soils. Under the California Revised Storie Index, this translates to Grade 1 (excellent) index rating. The NRCS farmland classification identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. It identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland.

Prime soils are defined as those with a Land Capability Class (LCC) of 1 or 2, a California Revised Storie Index of Grade One (Excellent), or an NRCS farmland classification of "prime farmland if irrigated." The California Agricultural Land Evaluation and Site Assessment (LESA) Model (results contained in Appendix B) was run for the proposed TCSP area (149.72 - acres) as part of the 2007 Initial Study (California Agricultural LESA Model, 2007). According to the results of the LESA model (Appendix B), soils in the TCSP area consist of Camarillo Loam, have a LCC class between 1 and 2, and a Storie index of 75 (Grade 2). As the soils on the TCSP area have a LCC of 1 or 2, the soils are classified as prime soils.

d. Agricultural/Urban Interface Issues. Large agricultural parcels in and around the TCSP area abut urban land uses, including Oxnard Airport, business and research park uses, and light manufacturing development. Development in and adjacent to agricultural areas in Ventura County in the past has created a variety of potential conflicts for both growers and urban uses. Existing areas of potential conflict are north of Doris Avenue and west of Ventura Road. Potential agricultural/urban land use conflicts can arise from the following activities, among others:

Potential Concerns for Urban Neighbors

- *Use of pesticides/dust problems in vicinity of residential neighborhoods, particularly near schools.*
- *Odors and health concerns associated with fertilizer/pesticide application and livestock.*
- *Noise related to farming equipment or farm worker activities.*
- *Farm worker parking.*

Potential Concerns for Agricultural Interests

- *Restrictions on activity arising from neighbor concerns/complaints*
- *Loss of revenue and competitiveness due to loss of high-quality soil and high-productivity agricultural land*



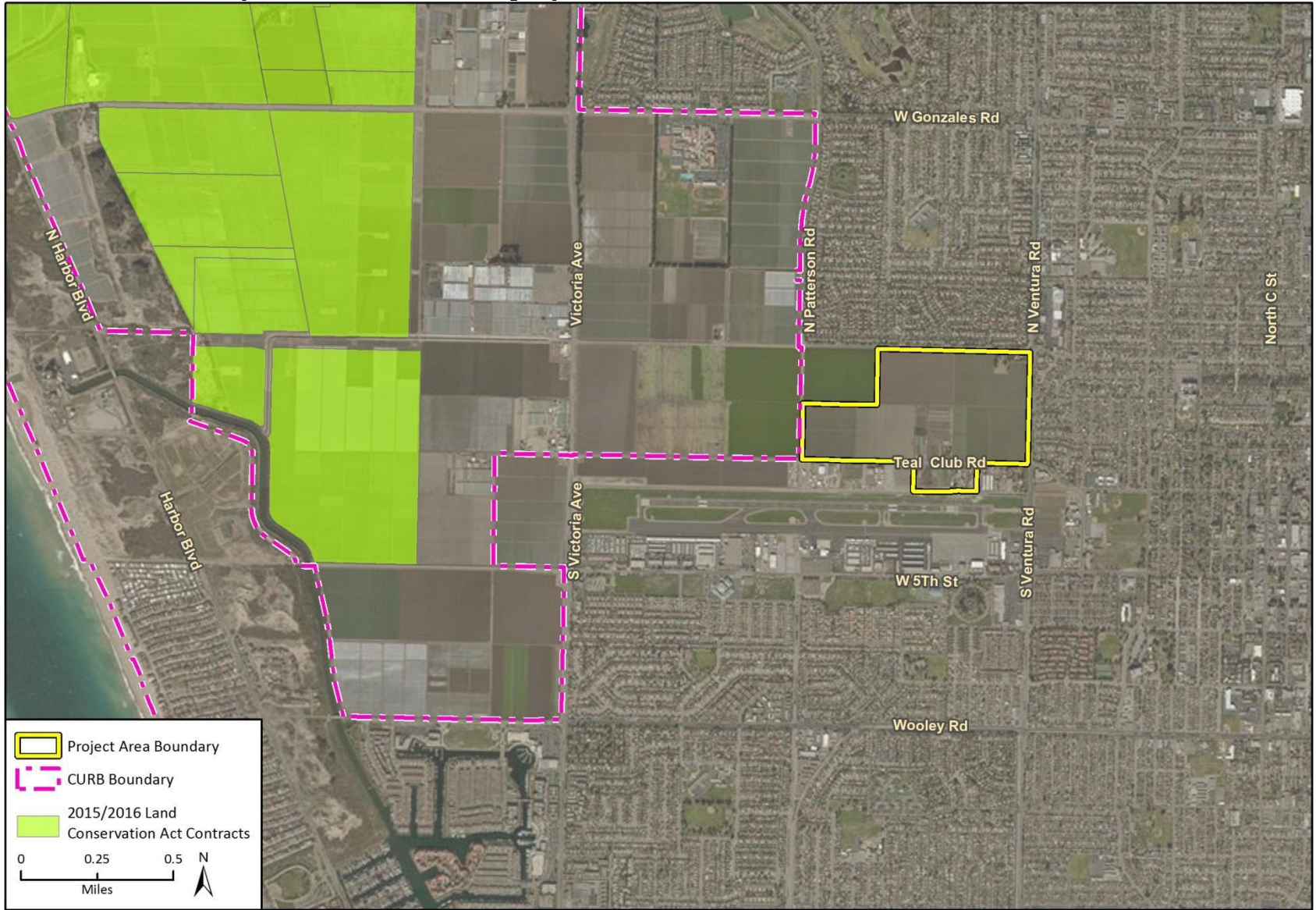
- *Competition for water and land*
- *Pilferage, trespassing, and littering*
- *Dust from adjacent construction activity*
- *Consistency with agricultural protection policies*

e. Regulatory Setting. Several regulatory measures intended to preserve agriculture have been adopted at the state and local levels. These include Land Conservation Act (LCA) contracts, greenbelt agreements, the Save Open Space and Agricultural Resources (SOAR) Ordinance, City Urban Restriction Boundary (CURB), and the Ventura County Agricultural Commissioner's Agricultural/Urban Buffer Policy. The County of Ventura also adopted a revised Right-to-Farm Ordinance in October 1997 that protects existing agricultural lands against nuisance lawsuits from adjacent urban development. Existing programs and policies intended to preserve and protect agriculture in the region are described below.

Williamson Act/Land Conservation Act (LCA) Contracts. A primary tool to preserve farmlands is the California Land Conservation Act (LCA) or Williamson Act contract program, established in 1965. Under provisions of the Act, private landowners may voluntarily enter into a long-term contract (minimum of 10 years) with cities and counties to form agricultural preserves and maintain their property in agricultural or open space uses in return for a reduced property tax assessment based on the agricultural value of the property. The term of an LCA contract is generally ten years and the contract automatically renews itself each year for another ten-year period, unless a Notice of Non-Renewal is filed or the contract is cancelled. State Government Code Section 51282 provides specific findings that must be made for the approval of LCA contract cancellations. Ventura County entered the program in 1969 and in 2016 the County had 123,404 acres under LCA (10-year) contracts and 3,766 acres under Farmland Security Zone Act (FSZA)/LCA (20-year) contracts in the unincorporated area, for a total of approximately 127,170 acres under contract (California Department of Conservation, 2016). There are no lands under LCA contracts in the project area (California Department of Conservation, 2009). However, the project area is located approximately 1.26 miles east of several properties under LCA contracts. See Figure 4.2-2 for the location of lands under LCA contract.

Greenbelts. Greenbelts are policies adopted by resolution or ordinance among public agencies with land use control. They represent a form of mutual policy control between two or more jurisdictions concerning urban form, the protection of farmland and open space, and the future extension of urban services/facilities and annexations. Greenbelts are intended to operate as "community separators" or "buffers" and participating cities agree not to extend municipal services into the greenbelts or annex greenbelt lands. Greenbelt agreements usually have no binding legal authority to regulate land uses except that they require amendment and consent of all parties to remove an area from the greenbelt. That authority is found in the particular jurisdictions' general plans and zoning ordinances.

Figure 4.2-2 CURB Boundary and Williamson Act Property



Imagery provided by Microsoft Bing and its licensors © 2019. Additional data provided by California DOC 2015. County of Ventura 2019.
Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc.

Fig 4.2-2 CURB and LCA Map



The City of Oxnard is party to two greenbelt agreements, the Oxnard-Camarillo Greenbelt Agreement and the Ventura-Oxnard Greenbelt Agreement. The Oxnard-Camarillo Greenbelt Agreement was established in 1982 and covers 27,000 acres in unincorporated Ventura County. The Ventura-Oxnard Greenbelt covers approximately 5,104 acres of unincorporated County territory and begins on the west side of Patterson Road. The TCSP area is not located in either of these greenbelts, but is immediately adjacent to the Oxnard-Ventura Greenbelt. The areas where road widening would occur on Teal Club Road and Patterson Road are in the Ventura-Oxnard Greenbelt.

Save Open Space and Agricultural Resources (SOAR). The City adopted the SOAR ordinance establishing the Oxnard City Urban Restriction Boundary (CURB) in November 1998. The City's 2030 General Plan incorporates the 1998 SOAR ordinance. In 2016 the City renewed the SOAR ordinance through the year 2050. The purpose of this ordinance is to establish a CURB line to limit conversion of agricultural lands to non-agricultural lands without public debate and a vote of the people. The Oxnard CURB includes the following goals:

1. *Encourage efficient growth patterns and protect the City of Oxnard's quality of life by concentrating future development largely within existing developed areas, or, in some cases, directly adjacent to them, consistent with the availability of infrastructure and services;*
2. *Promote agricultural and other natural resource and open space uses as defined in Government Code section 65560(b) on lands outside of the CURB, such as preservation of natural resources, public and private outdoor recreation, uses that foster public health and safety, and productive investment for farming enterprises;*
3. *Manage the City's growth in a manner that fosters and protects the "small town" character of Oxnard while encouraging appropriate economic development in accordance with the City's unique local conditions;*
4. *Allow the City to continue to meet its reasonable housing needs for all economic segments of the population, especially low and moderate income households, by directing the development of housing into areas where services and infrastructure are more efficiently available; and*
5. *Promote stability in long term planning for the City by establishing a cornerstone policy within the General Plan designating the geographic limits of long term urban development and allowing sufficient flexibility within those limits to respond to the City's changing needs over time.*

The Oxnard SOAR Ordinance states that until December 31, 2050, the City must restrict urban services and urbanized uses of land to within the CURB, except for the purpose of completing roadways designated in the Infrastructure and Community Services chapter of the 2030 General Plan, 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 the SOAR Ordinance, a vested right pursuant to state or local law (City of Oxnard, November 2016). The SOAR Ordinance defines urbanized uses of land as "any development which would require the establishment of new city sewer systems or the significant expansion of existing city sewer infrastructure; or would create residential lots less than 10 acres in area per primary residence; or would result in the establishment of commercial or industrial uses which are neither exclusively related to agriculture nor exclusively related to the production of mineral resources."



Future urbanized uses of land and urban services associated with the TCSP are fully located within the Oxnard CURB line. Therefore, voter approval is not required to allow conversion of the TCSP area to non-agricultural use. See Figure 4.2-2 for a map of lands under CURB provisions. The widening of two roadways in support of the TCSP would occur outside the CURB line: Teal Club Road on its north side between Patterson Road and Victoria, and Patterson Road on its west side for 1,000 feet to the north of Teal Club Road. These roadway modifications would be consistent with the Infrastructure and Community Services chapter of the 2030 General Plan. Therefore, they are exempt under the SOAR Ordinance from voter approval of the conversion of land to non-agricultural use.

Ventura County Right-to-Farm Ordinance. Ventura County has adopted a Right-to-Farm Ordinance. This ordinance protects commercial agricultural operations against nuisance lawsuits, and requires disclosure to potential land buyers that agricultural operations are protected from such actions. To resolve potential landowner disputes, the Agricultural Commissioner's office is to provide non-binding mediation. While the County Right-to-Farm Ordinance specifically applies to commercial agricultural operations in the unincorporated area, all commercial agricultural operations that comply with agricultural standards currently are protected from nuisance claims under State law (Section 3482.5 of the California Civil Code), whether located in cities or unincorporated areas.

Agricultural/Urban Buffer Policy. The Ventura County Agricultural/Urban Buffer Policy was established by the Ventura County Agricultural Commissioner to prevent impacts related to agricultural and urban use conflicts. The policy is intended to lessen public and animal exposure to agricultural chemicals, dust, noise and odors and protect agricultural operations and land from vandalism, pilferage, trespassing and complaints against standard legal agricultural practices. 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 Agricultural Exclusive (AE), Open Space (OS), or Rural Exclusive (RE), and the farming activity is located outside a Sphere of Influence, as adopted by LAFCO. As a result, urban developments are to be conditioned to provide and maintain a 300-foot setback and chain-link fence on the non-agricultural property between the urban use and the agricultural use, or a 150-foot buffer/setback if a vegetative screen is installed.

Ventura County Local Agency Formation Commission (LAFCo). The Ventura County LAFCo operates according to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code §56000 et seq.). State law provides for LAFCos to be formed as independent agencies in each county in California. LAFCos implement state requirements and state and local policies relating to boundary changes for cities and most special districts, including spheres of influence, incorporations, annexations, reorganizations and other changes of organization. In this capacity, the Ventura County LAFCo is the boundary agency for cities and most special districts in Ventura County. LAFCo maintains review and permitting authority over City boundary change requests, including annexations for identified expansion areas.

LAFCo will approve a proposal for a change of organization or reorganization which is likely to result in the conversion of prime agricultural or open space land use to other uses only if the Commission finds that the proposal will lead to planned, orderly, and efficient development



(Ventura County LAFCo, October 2007). 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:

1. *The territory involved is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development;*
2. *The territory is likely to be developed within five years and has been pre-zoned for non-agricultural or open space use. In the case of very large developments, annexation should be phased whenever possible;*
3. *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;*
4. *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; and*
5. *The proposal will have no significant adverse effects on the physical and economic integrity of other prime agricultural or open space lands.*

4.2.2 Impact Analysis

a. Methodology and Significance Thresholds. Agricultural impacts were evaluated based upon the City's 2017 *CEQA Guidelines* and review of DOC farmland classifications, regulatory requirements that apply to the various agricultural lands within the TCSP area, and the potential of future development to create agricultural/urban interface. For analysis purposes, "important farmlands" include the following DOC classifications: Prime Farmland, Farmland of Statewide Importance, and Unique Farmland.

Significance criteria found in the City's 2017 *CEQA Guidelines* provide a means to identify potentially significant impacts. Impacts to agriculture would be significant if implementation of the proposed project would:

- 1) *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use*
- 2) *Conflict with existing zoning for agricultural use, or an existing Williamson Act contract*
- 3) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use*

As discussed in the Section 4.2.1, *Setting*, no properties within the TCSP area are under a Williamson Act/LCA contract. The entire TCSP area is currently zoned Agricultural Exclusive with a minimum lot size of 40 acres (AE-40) by the County of Ventura. With approval of the proposed TCSP and annexation of this area into the City of Oxnard, future development would be consistent with the City's zoning standards. Therefore, the proposed TCSP would not conflict with zoning for agricultural use or a Williamson Act contract. Also, no properties are zoned for timberland or contain forest land. Therefore, there would be no impacts with respect to timberland or forest resources. As previously discussed, the TCSP is within the established Oxnard CURB and adoption of the TCSP and



eventual development does not require voter approval. The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.2-4 lists the thresholds under consideration in the agricultural resources analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.2-4
 Summary of Agricultural Resources Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	X			
2. Would the project conflict with existing zoning for Agricultural use or an existing Williamson Act contract?			X	
3. Would the project involve other changes in the existing environment that, due to their location or nature, could result in conversion of off-site farmland to non-agricultural use?			X	

Impact AG-1 Implementation of the proposed TCSP would result in the conversion of approximately 149.5 acres of “important farmland” with prime soils to non-agricultural uses. This would result in the permanent loss of agricultural lands. Therefore, impacts would be Class I, significant and unavoidable.

As shown in Table 4.2-3, the TCSP area contains approximately 145.4 acres of farmland of statewide importance. Also, the areas where road widening would occur along Patterson Road and Teal Club Road contain approximately 4.1 acres of farmland of statewide importance. Therefore, approximately 149.5 acres of farmland of statewide importance would be affected by the proposed project. In addition to falling into this state-identified category, farmland in the project area represents a limited and diminishing resource in California due to a confluence of high quality soils (soils are prime soils), relatively flat aspect, and the region’s temperate coastal Mediterranean climate. Development under the proposed project would involve permanently removing 149.5 acres of land identified as farmland of statewide importance from agricultural production. Therefore, this impact would be potentially significant.

The 2030 General Plan Program EIR, incorporated by reference, identified the conversion of the TCSP to urban use and made the same significant impact finding. A Statement of Overriding Consideration was adopted with the 2030 General Plan that included the TCSP area.

Mitigation Measures. Potential mitigation, such as conservation easements, would not replace converted agricultural land or avoid a net decrease in available agricultural lands in the



City. Furthermore, 149.5 acres of “important farmland” is not available in the City, thereby precluding acquisition of such land. Nonetheless, the loss of important farmland is an issue of regional importance, and it is possible to help avert future loss on a regional scale. Therefore, the following mitigation measure is required to offset the regional impact to important farmland to the extent feasible.

AG-1 Agricultural Conservation. The applicant shall implement one of the two options below. The applicant for projects involving the Phase 1 properties shall implement Option 1, the Agricultural Conversion In-Lieu fee. For the applicants for Phase 2 properties, Option 1 is also the preferred option, though the City may review and allow Option 2.

Option #1: Agricultural Conversion In-Lieu Fee. Prior to issuance of the first grading permit, the applicant shall have paid an agricultural conservation in-lieu fee to the City of Oxnard. The final fee amount shall be determined by the City of Oxnard at its discretion. The funds shall be used for land acquisition (land or structure), refurbishment and/or construction of farmworker housing units within Oxnard. The use of such funds shall be determined at the discretion of the City Manager, Community Development Director, and Housing Director.

Option #2: Purchase of Agricultural Conservation Easements. Prior to recordation of the first final map in the TCSP area, the applicant shall have recorded permanent agricultural conservation easements on at least 50 acres in either the Oxnard Plain area of Ventura County, the Santa Clara River floodplain, or a location otherwise deemed acceptable by the City of Oxnard Community Development Department. Prior to issuance of a building permit for construction of the 500th residential unit, the applicant shall have recorded permanent agricultural conservation easements on at least 100 acres in the Oxnard Plain area of Ventura County, the Santa Clara River floodplain, or a location otherwise deemed acceptable by the City of Oxnard Community Development Department. Prior to issuance of a building permit for construction of the 990th residential unit, the applicant shall have recorded permanent agricultural conservation easements on at least 149.5 acres in the Oxnard Plain area of Ventura County, the Santa Clara River floodplain, or a location otherwise deemed acceptable by the City of Oxnard Community Development Department. All agricultural lands to be preserved via conservation easement shall be of comparable quality to the farmland of statewide importance that would be converted under implementation of the TCSP, containing row crops or tree crops and high soil fertility. Agricultural conservation easements shall perpetually restrict non-farm development and other uses that are inconsistent with commercial



agriculture. To the extent feasible, the applicant shall coordinate with and provide funding for qualified land conservation entities (i.e., land trusts) to secure and hold the easements in perpetuity.

Significance After Mitigation. Mitigation Measure AG-1 Option #1 would involve funding to be used towards the provision of farmworker housing. Farmworkers are needed to support and sustain agricultural production, but as local and regional housing prices increase, farmworkers face a shortage of affordable housing. Therefore, supporting local farmworker housing would also support the viability of agricultural operations in Ventura County. Mitigation Measure AG-1 Option #2 would involve recording of agricultural conservation easements which would help avert the future regional loss of agricultural lands to the extent feasible. Nonetheless, the impact to important farmland would remain significant and unavoidable even with implementation of either mitigation option due to the permanent, irreversible loss of important farmland within the TCSP area. Payment of fees associated with either mitigation option would not result in residual environmental impacts.

Impact AG-2 Development of non-agricultural uses in the TCSP area could potentially cause compatibility conflicts with on-site and nearby agricultural uses. Impacts would be Class II, *significant but mitigable.*

TCSP development adjacent to agricultural operations west of Patterson Road could result in conflicts for both urban and agricultural interests. New residents and businesses may be subject to the effects of various activities associated with standard agriculture operations. Impacts to residents and businesses may result from the use of pesticides/dust problems, odors associated with pesticides and livestock, and noise related to farming equipment.

In addition, potential conflicts could occur as phases of development are built adjacent to existing agricultural lands. As discussed in Section 4.2.1 (a) above, construction would be phased, rather than built all at one time. Phase 1 would include 91.83 acres of the project area. Interim agricultural buffers are proposed to allow Phase 2 owners to continue farming indefinitely as well as all internal roadway circulation needed to service Phase 1 (see Figure 2-5 in Section 2.0, *Project Description*). Proposed buffers would be 300 feet or 150 feet with a double row of appropriate trees (windrows). All proposed Phase 1 roads would be built and operable; residences for lots in the Phase 1 area within 150-foot buffers would not be built until Phase 2 is committed to development.

Upon buildout, internal conflicts would be eliminated as on-site agricultural uses are replaced with urban uses, but interim impacts would be potentially significant, particularly to residential development, if the buffers were not sufficient to preclude conflicts. It is anticipated that interim buffering and site treatments would be required and implemented consistent with the Ventura County Agricultural/Urban Buffer Policy.

Impacts to agricultural operations from nearby urban development may include dust generation during construction activities, trespassing, pilfering, and vandalism. Excessive dust generation could impact lands in agricultural production by causing reduced growth or premature death of crops (Ontario Ministry of Agriculture, June 2003). The dust control measures proposed in Section 4.4, *Air Quality*, would address concerns about the effects of



construction-generated dust on agricultural operations. Trespassing, vandalism, and pilferage impacts would be reduced through the development of the Community Park separating the land uses.

The Environmental Resources Chapter and the Community Development Chapter of the Oxnard 2030 General Plan addresses agricultural resources and the importance of defining agricultural/urban boundaries. Applicable goals and policies include:

- ER-1.2.** *Protect open space and agricultural uses around Oxnard through continued adherence to the Guidelines for Orderly Development, Ventura County Greenbelt programs, the Save Open-Space and Agricultural Resources Ordinance, and other programs or policies that may subsequently be adopted such as the SB 375 Sustainable Communities Strategy.*
- ER-12.11.** *To 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.*
- CD-6.1.** *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.*
- CD-6.2.** *Preserve agricultural land and uses within the Oxnard Planning Area unless other uses are allowed through a future CURB amendment and/or applicable exemptions.*

As indicated in goals ER-1.2, ER-12.11, CD-6.1, and CD-6.2 of the City's 2030 General Plan, boundaries and separations between urban/agricultural land uses are promoted to reduce potential conflicts. The TCSP proposes a 7.38-acre Community Park in PA 10 (see Figure 2-3 in Section 2.0, *Project Description*). As indicated in Section 4.2.1, *Setting*, agricultural production is located to the west of Patterson Road. The Community Park area would create an approximately 300-foot (0.5 miles) buffer between agricultural production and proposed residential uses in PA 11. Due to the distance between proposed residential uses and adjacent agricultural production, and compliance with existing buffer requirements, impacts related to potential conflicts with agricultural operations outside of the TCSP area would be less than significant. Therefore, the proposed TCSP would not cause changes in the environment that could result in the offsite conversion of farmland to non-agricultural use. However, as discussed above, impacts of Phase 1 development on agricultural operations on the Phase 2 properties would be potentially significant.

Mitigation Measures. The following mitigation measure would reduce potential internal agricultural/urban conflicts between the proposed TCSP phases.

- AG-2** **Interim Agricultural Buffers.** TCSP development adjacent to active agricultural operations shall provide fencing and a



minimum buffer of 300 feet to the agricultural operations, consistent with the Ventura County Agricultural Commissioner's Agricultural/Urban Buffer Policy (2006). If this distance is not practical due to project design or features, a minimum 150-foot buffer is acceptable if a vegetative screen is provided as specified in the Agricultural/Urban Buffer Policy. Consistent with Mitigation Measure AES-2, vegetative screens shall be windrows designed to emulate traditional regional windrows originally planted for farming operations, including spacing of trees and tree species of like stature as determined by the Community Development Director.

Significance After Mitigation. The above mitigation measure would allow for interim agricultural buffers between proposed residential and existing agricultural uses, minimizing potential land use compatibility issues between these land uses. With interim agricultural buffers, the proposed TCSP would not introduce other changes to the environment that could result in additional conversion of farmland to non-agricultural use, above and beyond the loss of important farmland discussed in Impact AG-1. Therefore, this impact would be less than significant.

c. Cumulative Impacts. The proposed project combined with other planned and pending projects would contribute to the conversion of agricultural land to non-agricultural uses. The City's 2030 General Plan Program EIR, which was certified in October 2011, found significant and unavoidable impacts related to the conversion of agricultural land to non-agricultural uses, as no feasible mitigation measures were available to reduce this impact to a less than significant level. Project development would convert approximately 149.5 acres of important farmland to non-agricultural uses and would therefore substantially contribute to this significant impact, even with implementation of Mitigation Measure AG-1 to avert the future regional conversion of important farmland with agricultural conservation easements.

As discussed in Section 4.2.1, *Setting*, a number of regulatory mechanisms are in place to minimize the conversion of agricultural land to nonagricultural use outside of the CURB, including the County SOAR ordinances, City CURB, and greenbelt agreements between Camarillo and Oxnard and between the City of Oxnard and City of Ventura. Nevertheless, planned development of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland within the CURB line would result in cumulatively significant agricultural resource impacts, as the conversion of such land to non-agricultural uses cannot be fully mitigated. According to the City's 2030 General Plan Program EIR (recirculated November 2009 version), cumulative development would result in the conversion of up to 2,215 acres of important farmland, of which 1,048 acres would be farmland of statewide importance. The specific 149.5 acre loss of farmland associated with buildout of the proposed project is included in General Plan assessment as shown on Figure 5-1, Important Farmland Updates, of the recirculated 2030 General Plan Program EIR and represents approximately 14% of the total cumulative loss of "important" farmlands within the CURB. Thus, the cumulative impact to agricultural would be significant and the project's contribution would be cumulatively considerable.

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4.3 AIR QUALITY

This section assesses the impacts of the proposed Teal Club Specific Plan and development of the additional Annexation area on local and regional air quality. Both temporary impacts relating to onsite construction activity and long-term impacts associated with operation of the proposed project are discussed. Discussions regarding greenhouse gas emissions and climate change are contained in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, of this EIR.

4.3.1 Setting

a. Climate and Meteorology. The semi-permanent high-pressure system west of the Pacific Coast strongly influences California's weather. It creates sunny skies throughout the summer and influences the pathway and occurrence of low-pressure weather systems that bring rainfall to the area during October through April. As a result, wintertime temperatures in Oxnard are generally mild while summers are warm and dry. During the day, the predominant wind direction is from the west and southwest, and at night, wind direction is from the northeast.

These predominant wind patterns are occasionally broken during the winter by storms coming from the north and northwest and by episodic Santa Ana winds. Santa Ana winds are strong northerly to northeasterly winds that originate from high-pressure areas centered over the desert of the Great Basin. These winds are usually warm, very dry, and often full of dust. They are particularly strong in the mountain passes and at the mouths of canyons.

Average daytime summer temperatures in the area are usually in the high 60s to low 70s (Fahrenheit). Nighttime low temperatures during the summer are typically in the high 50s, while the winter high temperature tends to be in the 60s. Characteristic of Oxnard's Mediterranean-type climate, typical winter low temperatures are in the 40s. Annual average rainfall in Oxnard is about 14 to 16 inches with most rainfall occurring between November and April (City of Oxnard General Plan Background Report, 2006).

Two types of temperature inversions (warmer air on top of colder air) are created in the Ventura County area: subsidence and radiational (surface). The subsidence inversion is a regional effect created by the Pacific high in which air is heated as it is compressed when it flows from the high-pressure area to the low-pressure areas inland. This type of inversion generally forms at about 1,000 to 2,000 feet and can occur throughout the year, but is most evident during the summer months. Surface inversions are formed by the more rapid cooling of air near the ground at night, especially during winter. This type of inversion is typically lower and is generally accompanied by stable air. Both types of inversions limit the dispersal of air pollutants within the regional airshed. The primary air pollutant of concern during the subsidence inversions is ozone, while carbon monoxide and nitrogen oxides are of greatest concern during winter inversions.

b. Regulatory Jurisdiction. The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air



quality regulations, while the Air Resources Board (ARB) in the California Environmental Protection Agency is the state agency that administers air quality regulations. Local control in air quality management is provided by the ARB through county-level Air Pollution Control Districts (APCDs) and multi-county Air Quality Management Districts (AQMDs). The ARB has established state air quality standards and is responsible for control of mobile emission sources, while the local APCDs and AQMDs are responsible for enforcing standards and regulating stationary sources. The ARB has established 14 air basins statewide. The project site is located in the South Central Coast Air Basin and is in the jurisdiction of the Ventura County Air Pollution Control Districts (VCAPCD).

c. Air Quality Standards. Federal and state standards have been established for six criteria pollutants, including ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulates less than 10 microns and 2.5 microns in diameter (PM₁₀ and PM_{2.5}), and lead (Pb). California has additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility reducing particles. Table 4.3-1 lists the current ambient air quality standards.

**Table 4.3-1
 Current Federal and State Ambient Air Quality Standards**

Pollutant	Averaging Time	Federal Primary Standards	California Standard
Ozone	1-Hour	---	0.09 ppm
	8-Hour	0.070 µg/m ³	0.070 µg/m ³
PM ₁₀	24-Hour	150 µg/m ³	50 µg/m ³
	Annual	---	20 µg/m ³
PM _{2.5}	24-Hour	35 µg/m ³	---
	Annual	12 µg/m ³	12 µg/m ³
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	24-Hour	0.14 ppm	0.04 ppm
	3-Hour	---	---
	1-Hour	0.075 ppm (primary)	0.25 ppm
Lead	30-Day Average	---	1.5 µg/m ³
	3-Month Average	0.15 µg/m ³	---

ppm = parts per million µg/m³ = micrograms per cubic meter

Source: California Air Resources Board, <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, last updated May, 2016.

Air pollution is hazardous to health, diminishes the production and quality of many agricultural crops, reduces visibility, degrades soils materials, and damages native vegetation. Of these effects, human health effects are of the greatest concern and are the key determinant for the establishment of the primary air quality standards discussed in this section of the EIR. The health and safety effects of air pollutants are described in the VCAPCD Air Quality Assessment Guidelines (October 2003). The criteria pollutants and their potential health effects are described below.



Carbon Monoxide. Carbon monoxide, a colorless, odorless, poisonous gas, is a local pollutant that in high concentrations is found only very near the source. Carbon monoxide is a by-product of fuel combustion, but is generally not a concern with typical residential stationary sources (gas water and space heaters, gas dryers) since these are required by law to be properly vented. Automobile traffic is a major source of carbon monoxide with elevated concentrations usually found only near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

Ozone. Ozone is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_x) and reactive organic gases (ROG)¹. Nitrogen oxides are formed during fuel combustion while reactive organic gases are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of May and October. Ozone is a pungent, colorless toxic gas that can cause detrimental health effects including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, persons with respiratory disorders, and people who exercise strenuously outdoors.

Nitrogen Dioxide. Nitrogen dioxide (NO₂) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. Nitrogen dioxide is an acute irritant, but at typical atmospheric concentrations, it is only potentially irritating. A relationship between NO₂ and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light and causes a reddish brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM₁₀ and acid rain.

Suspended Particulates. PM₁₀ is small particulate matter measuring no more than 10 microns in diameter, while PM_{2.5} is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates, and sulfates. Suspended particulates are a by-product of fuel combustion and wind erosion of soil and unpaved roads, and are directly introduced into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates (PM_{2.5}) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a serious health threat to all groups,

¹Organic compound precursors of ozone are routinely described by a number of variations of three terms: hydrocarbons (HC), organic gases (OG), and organic compounds (OC). These terms are often modified by adjectives such as total, reactive, or volatile, and result in a rather confusing array of acronyms: HC, THC (total hydrocarbons), RHC (reactive hydrocarbons), TOG (total organic gases), ROG (reactive organic gases), TOC (total organic compounds), ROC (reactive organic compounds), and VOC (volatile organic compounds). While most of these differ in some significant way from a chemical perspective, from an air quality perspective two groups are important: non-photochemically reactive in the lower atmosphere, or photochemically reactive in the lower atmosphere (HC, RHC, ROG, ROC, and VOC). VCAPCD uses the abbreviations ROG and ROC interchangeably to denote organic precursors.



but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there, which can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an adsorbed toxic substance.

d. Current Ambient Air Quality. VCAPCD is required to monitor air pollutant levels to assure that the applicable air quality standards are met and, in the event they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "nonattainment." Ventura County was designated as in attainment for the federal 1-hour ozone standard as of May 27, 2009. Furthermore, as of August 30, 2012, the EPA has found Ventura County in attainment of the federal 1997 8-hour ozone standard. Ventura County is designated under the federal 2008 standard as in nonattainment for 8-hour ozone (AQMP, 2016) and under the state standards as in nonattainment for ozone, PM_{2.5}, and PM₁₀.

The ARB provides data from the network of air monitoring locations throughout the state. The monitoring station located closest to the project area and most representative of air quality in Oxnard is the El Rio-Rio Mesa School Station in Oxnard (about 7 miles northeast of the project area). Table 4.3-2 summarizes the annual air quality data for in the local airshed for the criteria pollutants of greatest concern in Ventura County.

As shown, the ozone concentrations at the El Rio-Rio Mesa School Monitoring Station in Oxnard did exceed the state eight-hour standards for one day in 2017. The PM₁₀ and PM_{2.5} concentrations exceeded federal standards a few days each year from 2017 to 2019. The PM₁₀ concentration exceeded state standards 29 days in 2017, 21 days in 2018, and 14 days in 2019.

Ozone is a secondary pollutant that is not produced directly by a source, but rather is formed by a reaction between NO_x and ROG in the presence of sunlight. Reductions in ozone concentrations are dependent upon reducing emissions of these precursors. The major sources of ozone precursors in Ventura County are motor vehicles and other mobile equipment, solvent use, pesticide application, the petroleum industry, and electric utilities. The major sources for PM₁₀ are road dust, construction equipment and activities, mobile sources, and farm operations. Locally, Santa Ana winds are responsible for entraining dust and occasionally causing elevated PM₁₀ levels.



**Table 4.3-2
 Ambient Air Quality at the El Rio-Rio Mesa School Monitoring Station**

Pollutant	2017	2018	2019
Ozone, ppm - Worst Hour	0.084	0.072	0.078
Number of days of State exceedances (>0.09 ppm)	0	0	0
Ozone, ppm – Worst 8 Hours	0.071	0.062	0.070
Number of days of State exceedances (>0.070)	1	0	0
Number of days of Federal exceedances (>0.075)	1	0	0
Carbon Monoxide, ppm - Worst 8 Hours	N/A	N/A	N/A
Number of days of State/Federal exceedances (>9.0 ppm)	N/A	N/A	N/A
Nitrogen Dioxide, ppm - Worst Hour	36.0	49.0	41.0
Number of days of State exceedances (>0.18 ppm)	0	0	0
Particulate Matter <10 microns, [g/m ³ Worst 24 Hours*	287.9	209.0	192.4
Measured Number of Days of State exceedances (>50 [g/m ³) *	29	21	14
Measured Number of Days of Federal exceedances (>150 [g/m ³) *	1	2	2
Particulate Matter <2.5 microns, [g/m ³ Worst 24 Hours*	81.3	41.2	25.5
Measured Number of Days of Federal exceedances (>35 [g/m ³) *	4	1	0

N/A = not available

Source: California Air Resources Board, 2017-2019 Annual Air Quality Data Summaries available at <http://www.arb.ca.gov/adam/topfour/topfour1.php>

* California standards for ozone, carbon monoxide, and particulate matter are not to be exceeded. Federal standard for CO not to be exceeded more than once per year. Federal ozone standard is attained when the fourth highest eight-hour concentration 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 µg/m³ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 % of the daily concentrations, averaged over three years, are equal to or less than the standard.

e. Ventura County Air Quality Management Plan. The Federal Clean Air Act Amendments (CAAA) mandates that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. The SIP includes pollution control measures to demonstrate how the standards will be met through those measures. The SIP is established by incorporating measures established during the preparation of an Air Quality Management Plan (AQMP) and adopted rules and regulations by each local air quality management district, which are submitted for approval to the ARB and the USEPA. The goal of an AQMP is to reduce pollutant concentrations below the National Ambient Air Quality Standards (NAAQS) through the implementation of air pollutant emissions controls.

In 2008, the USEPA classified Ventura County as a serious 8-hour ozone nonattainment area. VCAPCD adopted the Final 2016 AQMP in February 2017, which presented strategies and control measures that were intended to bring the County into compliance. The 2016 AQMP



indicates that Ventura County can expect to attain the 2008 federal 8-hour ozone standard by 2020. 2020 data is not available to indicate if Ventura County has achieved attainment.

f. City of Oxnard Energy Action Plan (EAP). The City of Oxnard adopted its Energy Action Plan in April 2013, as required by the 2030 General Plan. The EAP builds upon existing energy conservation efforts and identifies energy conservation and production programs consistent with 2030 General Plan goals and policies, utility company programs, and State and Federal legislation and initiatives. The EAP focuses primarily on electricity efficiency and conservation, but also includes natural gas and renewable energy production strategies. The City proposes a reduction target of 10% below the 2005 baseline for electricity and natural gas consumption provided by Southern California Edison and SoCal Gas Company.

g. Sensitive Receptors. Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress. Certain population groups are considered more sensitive to air pollution than others. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases. Residential uses are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. The TCSP area encompasses 149.72 acres and the additional Annexation area encompasses 11.4 acres. Sensitive receptors near the project area include residences 130 feet east of the project site across Ventura Road, 75 feet north of the project area across Doris Ave, and 50 feet south of the project area across Teal Club Road. An elementary and middle school are proposed adjacent to the northern boundary of the TCSP area and Community Memorial Hospital is approximately 0.4 miles northeast of the project area.

4.3.2 Impact Analysis

a. Significance Thresholds. Based on the City's 2017 *Threshold Guidelines*, air quality impacts would be considered significant if the proposed project would:

1. Conflict with population or other growth forecasts contained in the Ventura County AQMP or otherwise obstruct implementation of the Ventura County AQMP;
2. Violate any state or federal air quality standard or contribute substantially to an existing or projected air quality standard violation.
3. Result in a net increase of any criteria air pollutant in excess of quantitative thresholds recommended by the VCAPCD;
4. Expose sensitive receptors to substantial pollutant concentrations
5. Create objectionable odors affecting a substantial number of people

The threshold guidelines used to analyze air quality impacts are derived from those of the VCAPCD. The most recent VCAPCD comprehensive publication regarding air quality assessment is the *Ventura County Air Quality Assessment Guidelines* (October 2003). The VCAPCD's *Air Quality Assessment Guidelines* recommend significance thresholds for projects proposed in Ventura County. Under these guidelines, projects that generate more than 25



pounds per day of ROG or NO_x are considered to jeopardize attainment of the federal ozone standard and thus have a significant adverse impact on air quality.

The VCAPCD has not established quantitative thresholds for particulate matter. However, a project that may generate fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons, or which may endanger the comfort, repose, health, or safety of any such person, or which may cause or have a natural tendency to cause injury or damage to business or property is considered to have a significant air quality impact by the VCAPCD. This threshold is particularly applicable to the generation of fugitive dust during construction grading operations.

The VCAPCD's 25 lbs per day thresholds for ROG and NO_x are not intended to be applied to construction emissions since such emissions are temporary. For construction impacts, the VCAPCD recommends minimizing fugitive dust through various dust control measures. Therefore, as outlined in the VCAPCD's 2003 *Air Quality Assessment Guidelines*, the project's impact is considered significant if it would:

- *Generate daily emissions exceeding 25 lbs of reactive organic compounds (ROG) or nitrogen oxides (NO_x);*
- *Cause an exceedance or making a substantial contribution to an exceedance of an ambient air quality standard;²*
- *Directly or indirectly cause the existing population to exceed the population forecasts in the most recently adopted AQMP;*
- *Be inconsistent with goals and policies of the Ventura County AQMP and emit greater than two lbs of ROG or NO_x per day;*
- *Create a human health hazard by exposing sensitive receptors to toxic air emissions; or*
- *Create objectionable odors affecting a substantial number of people.*

Construction Emissions. As discussed above, the VCAPD does not recommend any thresholds of significance for construction emissions. As stated in the Guidelines, "Construction-related emissions...of ROC and NO_x are not counted towards the two significance thresholds, since these emissions are temporary. However, construction-related emissions should be mitigated if estimates of ROC and NO_x emissions from the heavy-duty construction equipment anticipated to be used for a particular project exceed the 5 pounds per day threshold in the Ojai Planning Area, or the 25 pounds per day threshold in the remainder of the county."

Operational Emissions Estimates. The California Emissions Estimator Model (CalEEMod) software was used to perform emissions estimates. When project specific information was not available, default assumptions were used to calculate area, energy, and

² "Substantial" is defined as making measurably worse an existing exceedance. Since the VCAPCD does not provide a numerical value for "substantial contribution," changes in carbon monoxide concentrations were determined to be significant and substantial for this analysis if concentrations including project traffic caused an exceedance of the California one-hour standard of 20 parts per million (ppm) carbon monoxide or the federal and state eight-hour standard of 9.0 (ppm) is exceeded. This latter standard follows the South Coast Air Quality Management District (SCAQMD) definition of significance for CO impacts (SCAQMD, CEQA Handbook, 1993).



mobile source emissions associated with the project. The estimated number of vehicle trips used to estimate air pollutant emissions impacts is from the EIR traffic study (Appendix I).

Carbon Monoxide “Hot Spot” Analysis. According to the Ventura County *Air Quality Assessment Guidelines*, a CO screening analysis should be conducted for intersections that would be significantly affected by a proposed project and that experience, or are anticipated to experience, level of service (LOS) E or F. “Hot spots” are defined as locations where local ambient CO concentrations exceed the State or Federal ambient air quality standards. Such concentrations typically occur near heavily congested roadway intersections.

The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.3-3 lists the thresholds under consideration in the air quality analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.3-3
 Summary of Air Quality Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Would the project conflict with population or other growth forecasts contained in the Ventura County AQMP or otherwise obstruct implementation of the Ventura County AQMP?		X		
2. Would the project violate any state or federal air quality standard or contribute substantially to an existing or projected air quality standard violation?	X			
3. Would the project result in a net increase of any criteria air pollutant in excess of quantitative thresholds recommended by the VCAPCD?	X			
4. Would the project expose sensitive receptors to substantial pollutant concentrations?			X	
5. Would the project create objectionable odors affecting a substantial number of people?			X	

Impact AQ-1 Project construction would generate temporary air pollutant emissions of ozone precursors ROG and NO_x, as well as fugitive dust (PM₁₀ and PM_{2.5}). VCAPCD recommends that lead agencies include mitigation measures to reduce construction emissions; therefore, temporary construction-related air quality impacts would be Class II, *significant but mitigable*.

As discussed in Section 2.0, *Project Description*, buildout of the TCSP would occur in three phases (two phases for the TCSP and a third phase for the additional Annexation area), with full buildout estimated to occur in 2030. Construction activity and associated emissions of ozone



precursors (ROG and NO_x) and dust (PM₁₀) would occur periodically during construction over the approximately 10 years.

The proposed project would allow for the development of 990 residential units, 132,000 gross square feet (gsf) of business park and commercial space, 12.3 acres of community and neighborhood parks and open space, and new and widened arterials and collector streets, utility infrastructure, transportation improvements, and the Annexation of 11.4 acres south of Teal Club Road that would be Pre-zoned Light Manufacturing (M-1). As described in Section 2.0, *Project Description*, the assumed buildout is 173,804 gsf of manufacturing space and 173,804 gsf of warehouse space.

The VCAPCD does not classify short-term construction impacts as significant because of their temporary nature, nor does the VCAPCD have quantitative thresholds for construction emissions. Nevertheless, because air pollutant levels in Ventura County exceed state and federal ozone standards and the state PM₁₀ standard, VCAPCD recommends that lead agencies include measures to reduce fugitive dust, and ROG and NO_x for all construction activity to minimize emissions of ozone precursors and fugitive dust.

Mitigation Measures. The Ventura County Air Quality Assessment Guidelines (October 2003) recommends various techniques to reduce construction-related emissions. Mitigation measures AQ-1(a) and (b) are recommended by the VCAPCD to minimize emissions of ozone precursors ROG and NO_x, as well as PM₁₀ during construction. Mitigation measure AQ-1(c) would further reduce construction emissions of volatile organic gases associated with off-gassing from architectural coatings.

AQ-1(a)

Dust Control Measures. The following shall be implemented during grading and construction to control dust.

1. *The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.*
2. *Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavating activities. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.*
3. *Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities:*
 - a. *All trucks shall be required to cover their loads as required by California Vehicle Code Section 23114.*
 - b. *All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.*
4. *Graded and/or excavated inactive areas of the construction site shall be monitored at least weekly for dust stabilization. Soil stabilization*



methods shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area within three weeks, it shall be seeded and watered until grass growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

5. *Signs shall be posted on-site limiting traffic to 15 miles per hour or less.*
6. *During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to affect adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust from being an annoyance or hazard, either off-site or on-site.*
7. *Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.*
8. *Personnel involved in grading operations, including contractors and subcontractors, shall wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.*
9. *Shaker plates shall be installed at all truck exits from the site.*
10. *Dust control requirements shall be shown on all grading plans.*
11. *Signs displaying the APCD Complaint Line Telephone number for public complaints shall be posted in a prominent location visible off the site: (805) 645-1400 during business hours and (805) 654-2797 after hours.*

AQ-1(b)

Construction Equipment Controls. The following shall be implemented during construction to minimize emissions of ozone precursors.

1. *Construction contractors shall minimize equipment idling time throughout construction. Engines shall be turned off if idling would be for more than five minutes.*
2. *Equipment engines shall be maintained in good condition and in proper tune as per manufacturers' specifications.*
3. *The number of pieces of equipment operating simultaneously shall be minimized.*
4. *Construction contractors shall use alternatively fueled construction equipment (such as compressed natural gas, liquefied natural gas, or electric) when feasible.*
5. *The engine size of construction equipment shall be the minimum practical size.*
6. *Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated clean diesel engines) shall be utilized.*
7. *During the smog season (May through October), the construction period should be lengthened so as to minimize the number of vehicles and equipment operating at the same time.*



AQ-1(c) Low Volatile Paints. Low volatile interior and exterior paints shall be used for architectural coatings wherever painted surfaces are proposed.

Significance After Mitigation. Based on guidance from VCAPCD, implementation of these required mitigation measures would ensure that construction-related air emissions, and impacts would remain less than significant.

Impact AQ-2 Operational emissions of ROG and NO_x would exceed VCAPCD's daily thresholds. While the impacts of vehicle emissions and related impacts are mitigable with payment of Transportation Demand Management (TDM) fees, not all operational emissions are mitigable. Therefore, the project would have a Class I, significant and unavoidable, impact to regional air quality.

Full buildout of the TCSP and development of the additional annexation area south of Teal Club Road were modeled in CalEEMod to estimate total emissions associated with operation of the project. Emissions include area sources, energy sources, and mobile emissions. Area sources include use of consumer products, use of gas-powered landscaping equipment, re-application of architectural coating (re-painting), and use of fireplaces/hearths. Energy sources include natural gas for uses such heating/air conditioning, appliances, lighting, and water heating. Mobile emissions include vehicle trips (including residents, employees, deliveries, visitors, and customers to the commercial areas). The majority of project-related operational emissions would result from vehicle trips to and from the site.

Maximum daily emissions of ROG, NO_x, CO, PM₁₀ and PM_{2.5} were estimated based on the proposed uses of the project, as well as the estimated number of project-generated vehicle trips. Vehicle trips are discussed in detail in Section 4.13, *Transportation and Traffic*.

Table 4.3-4 includes the results of the emissions modeling and provides the VCAPCD significance thresholds for comparison. As indicated, the increase in ROG emissions would exceed the VCAPCD 25 pounds per day threshold during Phase 1 development. This exceedance results from high emissions associated with project-generated area and energy sources (consumer products, fireplaces, natural gas, etc. as described in more detail below). The increase in NO_x emissions, which are due almost entirely to project-generated traffic, would also exceed the VCAPCD 25 pounds-per-day threshold during Phase 1 development. Emissions associated with operation of the additional annexation area would not exceed VCAPCD thresholds. However, total emissions from the three combined phases of development would exceed VCAPCD thresholds. This would be a potentially significant impact.

**Table 4.3-4
 Estimated Operational Emissions**

Emission Source	Emissions Estimate (lbs/day)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Teal Club Specific Plan – Phase 1:					
Area	30.8	0.7	59.5	0.3	0.3
Energy	0.4	3.1	1.4	0.3	0.3
Mobile	10.7	40.5	111.9	55.9	15.1
Subtotal	41.9	44.3	172.8	56.5	15.7
Teal Club Specific Plan – Phase 2:					
Area	10.0	0.3	22.0	0.1	0.1
Energy	0.1	1.3	0.7	0.1	0.1
Mobile	3.1	12.1	36.6	19.6	5.3
Subtotal	13.3	13.6	59.3	19.9	5.5
Additional Annexation Area – Phase 3:					
Area	8.0	<0.01	<0.01	<0.01	<0.01
Energy	0.1	1.2	1.0	0.1	0.1
Mobile	0.9	3.4	10.8	5.9	1.6
Subtotal	9.0	4.6	11.8	6.0	1.7
Total Emissions	64.2	62.5	243.9	82.4	22.9
VCAPCD Significance Threshold	25	25	N/A	N/A	N/A
Exceeds Threshold?	Yes	Yes	N/A	N/A	N/A

Source: Calculations using CalEEMod 2013.2.2. See Appendix C for calculations.
 Note: Numbers may not add up due to rounding.

The TCSP would include facilities to accommodate cyclists and pedestrians and reduce operational emissions from traffic. In accordance with Title 24 California Building Code energy efficiency requirements, the development would be designed with flat roofs to support installation of solar panels or other renewable energy equipment on all buildings within the TCSP, including the nine parcels proposed for Annexation. The TCSP area would be interconnected by sidewalks along public streets, pedestrian and bike paths within greenbelts, and bike lanes on major public streets. Public plazas and gathering places in the commercial mixed-use area would be designed for easy access to the pedestrian network. The model incorporates a number of these project elements, some of which reduce overall emissions.

Mitigation Measures. The following mitigation measures would reduce impacts related to air pollutant emissions associated with operation of the TCSP. Mitigation measures AQ(c) through AQ(e), while intended to reduce operational emissions, are also required in order to adhere to policies in the City’s 2030 General Plan.

AQ-2(a) TDM Fees. The TCSP project developer shall provide payment of fees to a suitable Transportation Demand Management Plan Fund. The fees will be based on the exceedance of the threshold for ROG and NO_x that is attributable to mobile emissions for Phase 1 and Phase 2. The fees shall be based on the unit cost for ROG and NO_x, in effect at the time the fee is to be paid using the VCAPCD guidelines formula of:

- $(\text{excess emissions lbs/day}) \times (\text{unit cost ROG}) \times (\text{days in operation}) \times (3 \text{ years}) = \text{Total cost}$



- $(\text{excess emissions lbs/day}) \times (\text{unit cost NOx}) \times (\text{days in operation}) \times (3 \text{ years}) = \text{Total cost}$

Payment of Phase 1 fees is required prior to issuance of the first certificate of occupancy for Phase 1. Payment of Phase 2 fees is required prior to issuance of the first certificate of occupancy for Phase 2. Payment of fees associated with the additional Annexation area is required for future developers prior to issuance of certificate of occupancy.

AQ-2(b) Increased Efficiency. Applicants for all projects in the TCSP area and in the nine parcels south of Teal Club Road proposed for Annexation shall include in construction and building management contracts the following energy saving requirements, or measures shown to be equally effective:

- *Residential and commercial land use shall increase efficiency 15% beyond Title 24 to achieve a Tier 1 "green building" designation within the California Green Building Code, or equivalent as determined by the Community Development Director.*
- *Use of solar or low-emission water heaters in new buildings.*
- *Require that commercial landscapers providing services at the common areas of the TCSP area use electric or battery-powered equipment, or other internal combustion equipment that is either certified by the California Air Resources Board or is three years old or less at the time of use, to the extent that such equipment is reasonably available and competitively priced in Ventura County (meaning that the equipment can be easily purchased in stores in Ventura County and the cost of the equipment is not more than 20% greater than the cost of standard equipment).*

Applicants for all projects in the TCSP area shall provide documentation of energy savings associated with materials proposed for use at time of building permit application.

AQ-2(c) Passive Energy Conservation Design. Applicants for all projects in the TCSP area and the nine parcels south of Teal Club Road proposed for Annexation shall include passive energy conservation design elements, including building material massing, orientation, architectural elements (deeply recessed windows, eave overhangs, etc.), landscape shading, recycled or low-impact materials, window glazing to increase insulation, and water circulation pumps to reduce water use, and/or similar measures shown to be equally effective.

Applicants for all projects in the TCSP area and the nine parcels south of Teal Club Road proposed for Annexation shall provide documentation of energy savings associated with materials and methods proposed for use at time of building permit application.



These documents shall be reviewed by City staff for achievement of adequate energy conservation.

AQ-2(d) Natural Ventilation. Applicants for all projects in the TCSP area and the nine parcels south of Teal Club Road proposed for Annexation shall include natural ventilation in building design plans.

Significance After Mitigation. Implementation of the recommended mitigation measures would reduce ROG and NO_x emissions associated with the operation of the TCSP and projects on the nine parcels south of Teal Club Road proposed for Annexation. Payment of TDM fees would mitigate the impacts from ROG and NO_x emissions to the extent feasible provided that the final square footage and dwelling units does not exceed those described in Section 2.0, *Project Description*. At this programmatic stage of planning for the TCSP, there are no specific building design plans and therefore it cannot be ensured that individual projects would include the design components necessary to reduce the impacts from area emissions to a less than significant level. Due to the exceedance of VCAPCD thresholds for ROG and NO_x that are not attributable to mobile emissions and therefore not mitigable by payment of fees, impacts would remain significant after mitigation. (However, mitigation measures AQ-2(b) through AQ-2(e) do ensure that the projects would be consistent with City of Oxnard General Plan policies intended to reduce operational emissions.)

Impact AQ-3 The proposed project would not create carbon monoxide concentrations exceeding state or federal standards. Localized air quality impacts would therefore be Class III, less than significant.

Areas with high vehicle density, such as congested intersections, have the potential to create high concentrations of CO. These areas are known as CO “hot spots.” Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

The entire South Central Coast Air Basin is in conformance with state and federal CO standards, and none of the air quality monitoring stations report CO levels. No stations in the vicinity of the project area have monitored CO in the last three years.

As shown in Table 4.3-3, total daily CO emissions would be 243.9 pounds. The VCAPCD does not have thresholds for CO because the County is in attainment of CO standards. Based on the low background level of CO in the project area and ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, the project would not create new hotspots or contribute substantially to existing hotspots. Localized air quality impacts related to CO hot spots would be less than significant.

Mitigation Measures. No mitigation measures would be required.



Significance after Mitigation. Carbon monoxide concentrations would not exceed state and federal thresholds and would therefore be less than significant without mitigation.

Impact AQ-4 The proposed project would not generate population growth beyond AQMP forecasts. It would not inhibit the City's ability to meet the goals of its EAP with implementation of energy efficiency measures described in Impact AQ-2. Impacts relating to AQMP and EAP consistency are therefore considered Class II, *significant but mitigable*.

A significant impact to air quality would occur if the proposed project would conflict with or obstruct implementation of the Ventura County AQMP or City of Oxnard EAP. Although any development project would represent an incremental negative impact on air quality in the basin, of primary concern is that project-related impacts have been properly anticipated in the regional air quality planning process and reduced whenever feasible.

Per the Ventura County AQMD Assessment Guidelines project consistency with the AQMP can be determined by comparing the actual population growth in the county with the projected growth rates used in the AQMP. However, if there are more recent population forecasts that have been adopted by the Ventura Council of Governments (VCOG) where the total county population is lower than that included in the most recently adopted AQMP population forecasts, lead agencies may use the more recent VCOG forecasts for determining AQMP consistency.

The current City population is estimated at 206,352 (DOF, 2020). Therefore, the proposed project would result in a total population of 210,261 persons (206,352 + 3,909, as discussed in Section 4.11, *Population and Housing*). As described in the VCAPCD *Air Quality Assessment Guidelines*, consistency with the AQMP can be determined by comparing the project with the most updated population forecast from VCOG. VCOG released the *2040 Population Forecast* in May 2008, which included a 2030 population projection of 277,934 for the City of Oxnard. Based on the existing population of 206,352, this population forecast predicts growth of 71,582 and the proposed project would account for 5% of this growth projection. Furthermore, the City certified the 2030 General Plan Program EIR in October 2011, which considered the possible environmental impacts of buildout to 2030, including adding approximately 40,000 people to the City's population with a population range of 238,000 - 286,000. The proposed project would result in approximately 10% of this forecast growth. Thus, the project is consistent with the current VCOG population projection and 2030 General Plan population growth forecasts, therefore the project is consistent with the AQMP and impacts would be less than significant.

The TCSP area is listed as a development area in the 2030 Oxnard General Plan. Development of the proposed plan would be consistent with the goals and policies of the General Plan and relevant strategic planning documents. Project implementation would contribute to long-range development goals identified by the City.

The EAP encourages energy efficiency, use of renewable energy sources, and a reduction of 10% in emissions below the 2005 baseline for electricity and natural gas consumption. Mitigation measures AQ-2(b) through AQ-2(d) would support the EAP goals and ensure that impacts related to consistency with the EAP would be less than significant.



Mitigation Measures. Mitigation measures AQ-2(b) through AQ-2(d) would ensure that impacts related to consistency with the EAP would be less than significant.

Significance After Mitigation. Implementation of the recommended mitigation measures would reduce ROG and NO_x emissions associated with the operation of the TCSP and development of the nine parcels proposed for Annexation south of Teal Club Road and would ensure that impacts related to consistency with air quality policies would be reduced to a level of insignificance.

Impact AQ-5 The project would not create objectionable odors that would affect neighboring properties. Impacts related to odors would be Class III, less than significant.

Land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not include any uses that would be associated with objectionable odors in the TCSP.

Light industrial uses that could be developed on the nine parcels proposed for Annexation south of Teal Club Road have the potential to include operations that may result in odors. The industrial uses would be adjacent to the Oxnard Airport, the proposed TCSP Business Research Park, and other industrial development to the east and west. Existing residences to the east of the Annexed parcels would not be significantly affected, as any proposed development would be subject to discretionary approval by the City.

Other odor emissions from the proposed project would be limited to odors associated with vehicle and engine exhaust and idling. The project does not include any known sources of objectionable odors for the long-term operations phase.

During construction activities, temporary odors from vehicle exhaust and construction equipment engines would occur. Construction-related odors would be short-term, and would cease upon completion. Therefore, the project is not expected to result in significant impacts related to objectionable odors during construction and operation.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. The City's 2030 General Plan Program EIR (certified 2011) considered the possible environmental impacts of buildout in accordance with the 2030 General Plan to accommodate a population within a range of 238,000 to 286,000 in Oxnard by 2030. The EIR found that impacts related to the cumulative increase of criteria pollutants to a non-attainment basin and exposure of sensitive receptors to substantial pollutant concentrations would be significant and unavoidable. The EIR found that impacts related to construction-related emissions and conflicts with the applicable air quality plan would be less than significant.



The AQMP was prepared to accommodate growth and as discussed in AQ-4, population forecasts included in the AQMP would not be exceeded as a result of the TCSP. Therefore, no cumulative impacts would occur and the proposed project's impacts would not be cumulatively considerable.

Cumulative development in the City would continue to implement dust control and equipment emissions mitigation measures during construction in accordance with City practices. Consequently, cumulative development within the City is not expected to cause a significant impact associated with construction activities. As described in Impact AQ-1, the proposed project would implement all appropriate mitigation measures during construction; therefore, the contribution of the project to any cumulative air quality impact would not be cumulatively considerable.

Because Ventura County is currently in nonattainment under the federal 2008 standard for 8-hour ozone (AQMP, 2016) and under the state standards for ozone, PM_{2.5}, and PM₁₀, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the proposed project's contribution, the VCAPCD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, this EIR assumes that individual development projects that generate operational emissions that exceed the VCAPCD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As discussed in Impact AQ-2, operational emissions associated with full buildout of the proposed project would exceed VCAPCD thresholds for ROG and NO_x. Therefore, the emissions generated by the proposed project would be cumulatively considerable regarding a substantial contribution to an existing or projected air quality violation.



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4.4 BIOLOGICAL RESOURCES

This section assesses potential impacts to biological resources associated with the proposed project. This section also assesses potential impacts to biological resources associated with the proposed widening of Teal Club Road, Patterson Road, Doris Avenue, and Victoria Avenue near the TCSP area. The discussion is based on review of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB), U.S. Geological Survey (USGS) topographic maps, and a field reconnaissance survey conducted by a Rincon Consultants biologist in July 2019.

4.4.1 Setting

The project area includes both the TCSP area and the additional Annexation area. The TCSP area is primarily composed of agricultural land currently cultivated with row crops. There are a barn and greenhouses in the central-southern portion and two occupied single -family residences in the northeast corner. The additional Annexation area south of Teal Club Road consists of a mix of vacant parcels and approximately six residences with ancillary vehicle storage and shop uses. The project area is generally flat with a gradual slope west. The project area is bordered to the west by agricultural land, to the north and east by residential development, and to the south by mixed-use development including the Oxnard Airport.

a. Vegetation. Existing vegetation consists of farmed agricultural row crops throughout the majority of the project area. Along the eastern boundary of the agricultural fields a tree windrow consisting of non-native mature blue gum eucalyptus (*Eucalyptus globulus*), Monterey cypress (*Cupressus macrocarpa*) and coast beefwood (*Allocasuarina verticillata*) is present. Remnant citrus and avocado trees, ornamental trees, shrubs, groundcover and five native coast live oaks (*Quercus agrifolia*) are present at the residences.

Two lots across Teal Club Road (not connected to the agricultural land) have previously been disturbed, but have not been developed and contain bare areas of soil with patches of annual brome grasslands which is comprised of non-native bromes (*Bromus* sp.) and other non-native herbaceous species such as wild radish (*Raphanus sativus*) and summer mustard (*Hirschfeldia incana*). The remaining lots (across the road) are developed with structures and parking lots as well as various ornamental shrubs.

b. Wildlife. The majority of the project area is farmed for agricultural production and as a result this land is used by a limited number of native wildlife species. A few common species (primarily birds), and species that have adapted to urbanized conditions, are expected to frequent the project area. Birds observed during the July 2019 project area survey included common species such as American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), Eurasian collared-dove (*Streptopelia decaocto*), house finch (*Haemorhous mexicanus*), and northern mockingbird (*Mimus polyglottos*). No nests were observed during the field reconnaissance, but it is probable that the non-native and ornamental trees in and adjacent to the project area serve as foraging, nesting, and/or roosting habitat for common birds.

c. Regulatory Setting. Regulatory authority over biological resources is shared by federal, state, and local authorities under a variety of statutes and guidelines. Primary authority



for general biological resources lies within the land use control and planning authority of local jurisdictions (in this instance, the City of Oxnard). The California Department of Fish and Wildlife (CDFW) is a trustee agency for biological resources through the state under CEQA and also has direct jurisdiction under the Fish and Game Code of California. Under the State and Federal Endangered Species Acts, the CDFW and the U.S. Fish and Wildlife Service (USFWS) also have direct regulatory authority over species formally listed as Threatened or Endangered.

The USFWS implements the Migratory Bird Treaty Act (16 United States Code (USC) Section 703-711), the Bald and Golden Eagle Protection Act (16 USC Section 668), and the Federal Endangered Species Act (FESA) (16 USC § 153 *et seq.*). Projects that would result in a “take” of any federally listed threatened or endangered species are required to obtain permits from the USFWS through either Section 7 (interagency consultation) or Section 10(a) (incidental take permit) of FESA, depending on the involvement by the federal government in permitting or funding the project. The permitting process is used to determine whether a project would jeopardize the continued existence of a listed species and what mitigation measures would be required to avoid jeopardizing the species. “Take” under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect an individual, or to attempt to engage in any such conduct.

Wetland and riparian habitats are protected on a federal, state, and local level. Wetland and riparian habitats may be subject to U.S. Army Corps of Engineers (USACE) jurisdiction as “waters of the United States,” pursuant to Section 404 of the Clean Water Act (CWA). Pursuant to authority granted under the CWA, the U.S. Environmental Protection Agency (EPA) and USACE finalized the Navigable Waters Protection Rule and the definition of “waters of the United States” contained in that rule. The rule became effective in all states, with the exception of Colorado, on June 22, 2020. This new rule streamlines the definition of WOTUS and provides guidance for property owners, developers and others as to the reach of federal jurisdiction. Significantly, the 2020 rule scales back the definition of “waters of the United States” and excludes the following from the definition (JDSUPRA, 2020):

- Ephemeral features that flow only in direct response to precipitation, including ephemeral streams, swales, gullies, rills and pools;
- Ditches that are not traditional navigable waters, tributaries or constructed in adjacent wetlands, subject to certain limitations;
- Prior converted cropland;
- Artificially irrigated areas that would revert to upland if artificial irrigation ceases (e.g., fields flooded for agricultural purposes);
- Artificial lakes and ponds that are not jurisdictional impoundments and that are constructed or excavated in upland or non-jurisdictional waters (e.g., farm, irrigation and stock watering ponds or water storage reservoirs);
- Water-filled depressions constructed or excavated in upland or in non-jurisdictional waters incidental to mining or construction activity, and pits excavated in upland or in non-jurisdictional waters for the purpose of obtaining fill, sand or gravel;
- Stormwater control features constructed or excavated in upland or in non-jurisdictional waters to convey, treat, infiltrate or store stormwater runoff;

Protection for wetlands and riparian habitat is also afforded through CDFW, pursuant to Section 1600 et seq. of the California Fish and Game Code (CFGC). Los Angeles Regional Water Quality Control Board (RWQCB) asserts jurisdiction over waters of the State, pursuant to Section 401 of the CWA. Any activity that would remove or otherwise alter wetland and riparian habitats is subject to scrutiny by the regulatory agencies through the CEQA review process and then later through the CDFW, USACE, and RWQCB permitting processes.

Sensitive species are classified in a variety of ways, both formally (e.g., State or Federally Threatened and Endangered Species) and informally (“Special Animals”). Species may be formally listed and protected as Threatened or Endangered by the CDFW or USFWS or as California Fully Protected (CFP). Informal listings by agencies include CDFW California Species of Special Concern (SC) (a broad database category applied to species, roost sites, or nests); or as USFWS Candidate taxa. CDFW and local governmental agencies may also recognize special listings developed by focal groups (i.e., Audubon Society Blue List, California Native Plant Society [CNPS] Rare and Endangered Plants, and U.S. Forest Service regional lists). Section 3503.5 of the CFGC protect birds of prey, and their nests and eggs against take, possession, or destruction.

Vegetation in California is accorded sensitivity ranking by the CDFW using the community classification system of Holland (1986, 1990), and the more recently accepted series concepts of Sawyer et al. (2009).

In response to legislative mandates, regulatory authorities have defined sensitive biological resources as those specific organisms that have regionally declining populations such that they may become extinct if declining population trends continue. Habitats are also considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance.

d. Special-Status Species & Habitats. Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS under the Federal Endangered Species Act (FESA); those considered “species of concern” by the USFWS; those listed or proposed for listing as rare, threatened, or endangered by the CDFW under the California Endangered Species Act (CESA); animals designated as “Species of Special Concern (SC)” by CDFW; and CDFW Special Plants, specifically those occurring with a California Rare Plant Rank 1A, 1B and 2 of the CNPS’s *Inventory of Rare and Endangered Vascular Plants of California, Seventh Edition*. During the USFWS listing process for federal species, “critical habitat” may also be designated. A number of special-status wildlife species are also considered to be of “local concern.” Animals in this category are of concern because they have limited distributions, are experiencing local or regional population declines, are vulnerable to current or future threats to their preferred habitat, and/or are of unusual scientific, recreational, or educational value.

A target list of special-status plant and animal species that could potentially occur in the project area was developed based on a review of the most recent version of the CNDDDB (CDFW 2019), general knowledge of the region, and general knowledge of the species that use the habitats of the region. A Rincon Consultants biologist conducted a site visit of the project area on July 30, 2019 to identify habitat types, refine the target list of species and assess the actual or potential

for occurrence of special-status species on the project area. No sensitive plants or animals were observed in the project area at that time.

Special-Status Plants. The CNDDDB identified occurrences of seven special-status plant species within a 5-mile radius of the project area (Table 4.4-1). However, all seven plant species require habitats specific to salt marsh or coastal conditions, and these types of habitat are not present in the project area. Special-status plant species (including those mentioned above) are not expected to occur in the project area. Table 4.4-1 lists sensitive plant species known to occur within a 5-mile radius of the project area.

Special-Status Wildlife. The CNDDDB identified occurrences of 13 special-status wildlife species within a 5-mile radius of the project area (Table 4.4-2). Analysis of the potential of these species to occur in the project area is based on the availability, quantity, and quality of suitable habitat. The species' habitat requirements and likelihood to occur on the project area are outlined below in Table 4.4-2. Two species identified by the CNDDDB, California horned lark (*Eremophila alpestris actia*) and monarch butterfly (*Danaus plexippus*), could potentially occur on the project area. The California horned lark is a CDFW Special Animal and is on the agency's Watch List because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction. The overwintering population of the monarch butterfly is also a CDFW Special Animal, and the species is under review by USFWS for possible federal listing. The overwintering population in California has declined by more than 99% in recent decades (Xerces Society 2019).

Horned lark has a moderate potential to forage and nest in the project area, as fallow fields are present, and the closest known occurrence is reported within 1 mile of the project area in an agricultural field surrounded by other agricultural fields. The overwintering population of monarch butterfly is on the CDFW Special Animals list. Overwintering roosts are not expected to occur in the project area, but temporary aggregations of monarch butterflies during migration do have low potential to occur in the windrow present in the project area.

Eucalyptus groves along the coast of central and southern California are sometimes used as clustering (aggregation) sites during migration and overwintering of monarch butterflies. Aggregation activity normally occurs from November through February on the California coast. Monarch butterflies typically use the same overwintering sites year after year, and there has been a sustained effort to map and track these sites. No overwintering of monarch butterflies in the project area has been documented (CDFW 2019, Xerces Society 2016). No monarch butterfly aggregations were observed along the windrow during the July 2019 project area visit, although none would be expected at that time of year. It is unlikely that the project area windrow of blue gum eucalyptus, Monterey cypress, and coast beefwood will be used for overwintering in the future, because the positioning of the trees makes them susceptible to high winds, and the trees are located immediately adjacent to North Ventura Road which experiences high human activity. However, the trees could be used temporarily for aggregation during migration to the more permanent overwintering sites.

**Table 4.4-1
 Potential Special-Status Plant Species Reported Within 5 Miles of the Project Area**

Common Name	Scientific Name	Species Status: Fed/State Listing Global /State CNPS CRPR	Habitat Requirements	Potential for Occurrence
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	Ventura Marsh milk-vech	FE/SE G2T1/S1 1B.1	Coastal salt marsh. Within reach of high tide or protected by barrier beaches, more rarely near seeps on sandy bluffs. 1 - 115 ft.	Not expected. No salt marsh habitat present in the project area.
<i>Atriplex serenana</i> var. <i> davidsonii</i>	Davidson's saltscale	-/ G5T1/S1 1B.2	Coastal and coastal bluff scrub. Alkaline soil. From sea level to 1,500 feet elevation.	Not expected. No coastal scrub habitat present on the project area
<i>Chaenactis glabruscula</i> var. <i>orcuttiana</i>	Orcutt's pincushion	-/ G5T1/S1 1B.1	Coastal bluff scrub, coastal dunes. Sandy sites. 9 -330 ft.	Not expected. No coastal or dune habitat present in the project area.
<i>Chloropyron maritimum</i> ssp. <i>Maritimum</i>	Salt marsh bird's-beak	FE/SE G4?T1/S1 1B.2	Coastal salt marsh, coastal dunes. Limited to the higher zones of the salt marsh habitat. 0 – 100ft.	Not expected. No salt marsh habitat present in the project area.
<i>Lasthenia glabrata</i> ssp. <i>Coulteri</i>	Coulter's goldfields	-/ G4T3/S2.1 1B.1	Coastal salt marshes, playas, valley and foothill grassland, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 3 - 4,600 ft.	Not expected. No salt marsh habitat present in the project area.
<i>Malacothrix similis</i>	Mexican malacothrix	-/ G2G3/SH 1A	Coastal dunes. 0 - 130 ft.	Not expected. No coastal dune habitat present in the project area.
<i>Pseudognaphalium leucocephalum</i>	white rabbit-tobacco	-/ G4/S2 2B.2	Riparian woodland, cismontane woodland, coastal scrub, and chaparral. Sandy, gravelly sites. From 115 to 1,700 feet elevation.	Not expected. No suitable habitat present in the project area.

Status:

FE = Federally Endangered SE = State Endangered
 FT = Federally Threatened ST = State Threatened
 FC = Federal Candidate SR = State Rare

G-Rank/S-Rank = Global Rank and State Rank as per NatureServe and CDFW's CNDDDB RareFind3.

CNPS CRPR (California native Plant Society California Rare Plant Rank; formerly CNPS List):

- 1A=Presumed Extinct in California
- 1B=Rare, Threatened, or Endangered in California and elsewhere
- 2=Rare, Threatened, or Endangered in California, but more common elsewhere
- 3=Need more information (a Review List)
- 4=Plants of Limited Distribution (a Watch List)

CRPR Threat Code Extension:

- .1=Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)
- .2=Fairly endangered in California (20-80% occurrences threatened)
- .3=Not very endangered in California (<20% of occurrences threatened)

Note: the "project area" includes the TCSP area and the additional annexation area



**Table 4.4-2
Special-Status Wildlife Species Reported Within 5 Miles of the Project Area**

Scientific Name	Common Name	Species Status: Fed/State Listing Global/State CDFW	Habitat Requirements	Potential for Occurrence
Invertebrates				
<i>Cicindela hirticollis gravida</i>	Sandy beach tiger beetle	-/ G5T2/S1 -	Inhabits areas adjacent to non-brackish water along the coast of California from San Francisco Bay to northern Mexico. Clean, dry, light-colored sand in upper zone. Subterranean larvae prefer moist sand not affected by wave action.	Not expected. Coastal water/sand habitat is not present in the project area.
<i>Coelus globosus</i>	Globose dune beetle	-/ G1/S1 -	Inhabitant of coastal sand dune habitat, from Bodega Head in Sonoma County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks; it burrows beneath the sand surface and is most common beneath dune vegetation.	Not expected. Sand dune habitat is not present in the project area.
<i>Danaus plexippus</i> pop. 1	Monarch butterfly – California overwintering population	-/ G5/S3 -	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Low. No overwintering has been documented at the site. Temporary resting aggregations could occur in the windrow in the project area.
Fish				
<i>Catostomus santaanae</i>	Santa Ana sucker	FT/ G1/S1 SC	Endemic to Los Angeles Basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, & algae.	Not expected. Permanent stream habitat is not present in the project area.
<i>Eucyclogobius newberryi</i>	Tidewater goby	FE/ G3/S2S3 SC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego Co to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water & high oxygen levels.	Not expected. Brackish water habitat is not present in the project area.
Reptiles				
<i>Anniella pulchra</i>	Silvery legless lizard	-/ G3G4T3T4Q/S 3 SC	Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with high moisture content.	Not expected. Populations within 5 miles are known in intact dune habitat, sandy soil habitat is not present in the project area.



Scientific Name	Common Name	Species Status: Fed/State Listing Global/State CDFW	Habitat Requirements	Potential for Occurrence
<i>Emys marmorata</i>	Western pond turtle	-/ G3G4/S3 SC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams & irrigation ditches, usually with aquatic vegetation. Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	Not expected. Aquatic habitat is not present in the project area. Closest known location is associated with the Santa Clara River.
<i>Phrynosoma blainvillii</i>	Coast horned lizard	-/ G4G5/S3S4 SC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial & abundant supply of ants & other insects.	Not expected. Sandy wash habitat not present in the project area. Nearest wash and known location are associated with the Santa Clara River.
Birds				
<i>Athene cunicularia</i>	Burrowing owl	-/ G4/S2 SC	Open, dry annual or perennial grasslands, deserts & scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Not expected. Grasslands, dry annual scrublands with burrows were not observed during July 2019 project area visit.
<i>Charadrius alexandrinus nivosus</i>	Western snowy plover	FT/ G4T3/S2 SC	Sandy beaches, salt pond levees & shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	Not expected. Sandy, gravelly or friable soil habitat is not present in the project area.
<i>Coccyzus americanus occidentalis</i>	Western yellow-billed cuckoo	FT/SE G5T3Q/S1 -	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, w/ lower story of blackberry, nettles, or wild grape.	Not expected. Riparian habitat not present in the project area. Nearest known location is 2 miles north, associated with the Santa Clara River.
<i>Eremophila alpestris actia</i>	California horned lark	-/ G5T3Q/S3 -	Coastal regions, chiefly from Sonoma Co. to San Diego Co. Also, main part of San Joaquin Valley & east to foothills. Short-grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.	Moderate potential for foraging and nesting. Fallow fields are present in the project area. Closest known occurrence was within 1 mile in an agricultural field, surrounded by other agricultural fields.
<i>Laterallus jamaicensis coturniculus</i>	California black rail	-/ST G3G4T1/S1 FP	Inhabits freshwater marshes, wet meadows, and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about one inch that do not fluctuate during the year and dense vegetation for nesting habitat.	Not expected. Marsh habitat is not present in the project area.



Scientific Name	Common Name	Species Status: Fed/State Listing Global/State CDFW	Habitat Requirements	Potential for Occurrence
<i>Passerculus sandwichensis beldingi</i>	Belding's savannah sparrow	-/S G5T3/S3 -	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County. Nests in <i>Salicornia</i> on and about margins of tidal flats.	Not expected. Salt marsh habitat is not present in the project area. Closest known occurrence is in association with the coast.
<i>Riparia</i>	Bank swallow	-/ST G5S2/S3 -	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	Not expected. Riparian habitat, vertical banks and fine-textured/sandy soil habitat is not present in the project area.
<i>Sternula antillarum browni</i>	California least tern	FE/SE G4T2T3Q/S2S3 FP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.	Not expected. Substrate, beach, alkali flat, or landfills are not present in the project area. Nearest known location is, associated with the Santa Clara River mouth and/or coastal habitat.
<i>Vireo bellii pusillus</i>	Least Bell's vireo	FE/SE G5T2/S2 -	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, baccharis, mesquite.	Not expected. Riparian habitat is not present in the project area. Closest known occurrence is associated with the Santa Clara River.

FT = Federally Threatened
 FC = Federal Candidate Species
 FE = Federally Endangered
 FS = Federally Sensitive
 G-Rank/S-Rank = Global Rank and State Rank as per NatureServe and CDFW's CNDDDB RareFind3.
 SC = CDFW Species of Special Concern
 Note: "project area" includes the TCSP area and the additional annexation area

SE = State Endangered
 ST = State Threatened
 SR = State Rare
 FP = Fully Protected

Nesting habitat for birds exists in portions of the project area and birds that are protected by the Federal Migratory Bird Treaty Act and the CFGC 3503 likely nest in the various habitats, such as the tree windrows in the project area.

In general, suitable raptor foraging habitat consists of open space at least 70 feet wide that is vegetated with naturalized grassland that provides suitable habitat for prey species and is connected to adjacent suitable foraging areas (Ormond Beach AMP, 2011). The agricultural fields on the project area provide marginal foraging habitat for common raptor species. The habitat is marginal because it is routinely maintained, consists of agricultural crops and is adjacent to disturbed, commercial, and residential areas. While some common raptor species, such as red-tailed hawk (*Buteo jamaicensis*), are less sensitive to nesting in urbanized



environments, the trees located on the project area offer marginal nesting habitat given there is minimal suitable foraging habitat in the surrounding area. Furthermore, the project area lacks nesting and foraging habitat for sensitive species including burrowing owl (*Athene cunicularia*) and white-tailed kite (*Elanus leucurus*) based on the habitat types and disturbances present.

Sensitive Plant Communities. The CNDDDB identified three sensitive plant communities within a 5-mile radius of the project area: Coastal and Valley Freshwater Marsh, Southern Coastal Saltwater Marsh, and Southern Riparian Scrub. The closest known Coastal and Valley Freshwater Marsh and the Southern Coastal Saltwater Marsh communities are associated with the Pacific Ocean, approximately 2.5 miles away. The closest known Southern Riparian Scrub community is associated with the Santa Clara River, approximately two miles to the north of the project area. None of these sensitive plant communities or other sensitive habitats were observed in or in the vicinity of the project area.

Final Critical Habitat. The CNDDDB identified, within a 5-mile radius of the project area, designated Critical Habitat for southern California steelhead (*Oncorhynchus mykiss*), southwestern willow flycatcher (*Empidonax traillii extimus*), tidewater goby (*Eucyclogobius newberryi*), western snowy plover (*Charadrius alexandrinus nivosus*), and Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*). No Critical Habitat occurs in the project area. Critical Habitat for Southern California steelhead and southwestern willow flycatcher is associated with the Santa Clara River, approximately two miles north of the project area. Critical Habitat for tidewater goby is located at the mouth of the Santa Clara River, approximately 3.5 miles to the northwest. Critical Habitat for western snowy plover and Ventura marsh milk-vetch is associated with the coast, approximately two miles to the west.

e. Jurisdictional Areas. Irrigation drainage ditches surround and bisect the project area. The ditches are not natural hydrological features and have been created for agricultural purposes. The agricultural ditches have discernible bed, bank, and channel characteristics in various locations. The ditches are frequently maintained and are left un-vegetated; however, immediately adjacent to some portions of the ditches, sparse upland non-native vegetation (such as summer mustard) is present. Drainage from the project area flows along the plowed row crops to the shallow above-ground ditches, then is conveyed under unpaved access roads by small-diameter culverts of various sizes and materials. Drainage is then directed toward a 24-inch arched corrugated metal pipe culvert under Patterson Road in the southwest corner of the project area. These ditches do not appear to be jurisdictional.

f. Wildlife Movement. The project area has been under agricultural production historically, as it is presently, and is surrounded by other agricultural and urban uses with high human activity and is not located in a known or mapped wildlife corridor. Although project area drainages may serve as limited and interrupted habitat for some common wildlife species, they are not likely to provide habitat for native or migratory aquatic species. Project area windrows may serve as resting sites for monarch butterflies to use during their migration to more permanent overwintering sites. For a discussion on monarch butterflies see section *d. Special Status Species* above.

4.4.2 Impact Analysis

a. Significance Thresholds. Chapter 1, Section 21001(c) of CEQA states that it is the policy of the state of California to “Prevent the elimination of fish and wildlife species due to man’s activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities.” Environmental impacts relative to biological resources may be assessed using impact significance criteria encompassing the *CEQA Guidelines* and federal, state, and local plans, regulations, and ordinances. Project impacts to flora and fauna may be determined to be significant even if they do not directly affect rare, threatened, or endangered species. In accordance with the City of Oxnard 2017 *CEQA Guidelines*, the proposed project would have a significant impact if it would:

1. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service*
2. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service*
3. *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means*
4. *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*
5. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance*
6. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan*

The project area does not contain riparian habitat or a sensitive natural community. The project area is not protected by any local policies or ordinances or by an adopted conservation plan. Therefore, impacts related to these issues are discussed in Section 6.0, *Effects Found Not to Be Significant*. The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.4-3 lists the thresholds under consideration in the biological resources analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).



**Table 4.4-3
 Summary of Biological Resources Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
4. 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?			X	
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	

Impact BIO-1 In the TCSP area, the additional Annexation area, and where Teal Club Road and Patterson Road would be widened, construction during the bird nesting season could directly or indirectly affect nesting birds protected under the Migratory Bird Treaty Act and the CFGC 3503. This would be a Class II, significant but mitigable, impact.

Development in the project area includes the removal of existing trees that may be used by birds as nesting habitat. Mature trees such as blue gum eucalyptus, Monterey cypress and coast beefwood are located in the project area and provide suitable habitat for nesting birds. Construction activity, including tree removal and construction noise, could potentially impact active nests. All bird nests are protected under CFGC Section 3503. Additionally, the federal Migratory Bird Treaty Act has been incorporated into the CFGC, and protects nesting birds, eggs and young. Disturbance of active bird nests (if present), would result in a significant impact.



Mitigation Measures. The following measures would mitigate potentially significant impacts relating to the presence of nesting birds and would ensure compliance with the Migratory Bird Treaty Act and CFGC. These measures would apply to all phases of project construction.

BIO-1(a) Nesting Bird Survey. If tree removal is to occur during the bird breeding season (February 15 through September 15), at a minimum one (1) survey shall be conducted prior to tree removal by a City-approved qualified biologist (a person with a biology degree and/or established skills in bird recognition). The survey shall occur no more than one (1) week prior to tree removal. The work limits plus a 250-foot buffer, as feasible, shall be surveyed to accommodate potential active raptor nests, as well as other birds nesting nearby. A copy of the biologist contract for these services shall be submitted to the Planning Department for review and approval prior to issuance of grading permits. A preconstruction meeting shall occur prior to tree removal and shall include the project proponent or designee, the construction foreman, City staff, and the City-approved biologist. A report summarizing the findings of the survey and the recommended buffers shall be provided to the Community Development Department prior to vegetation removal activities and vegetation removal and grading activities shall not commence until the Community Development Department provides an authorization to proceed directive. Work may be redirected to other areas by the Community Development Director as recommended by the biologist.

BIO-1(b) Establishment of Appropriate Buffers. In the event that nesting birds are observed within 250 feet of the disturbance/construction area, species-specific exclusionary buffers shall be determined by the qualified biologist, and construction timing and location shall be adjusted accordingly until the nestlings have fledged and are no longer dependent upon the nest. The active nests and exclusionary buffers shall be monitored by a qualified biologist (at least initially) to determine if the active nests are being adversely affected by construction activities and to determine if a buffer would need to be increased to reduce such effects.

Significance After Mitigation. With implementation of the above measures, potential impacts to nesting birds and raptors would be reduced to a less than significant level because preconstruction surveys and maintenance of appropriate buffers would ensure that construction activities remain distant from nesting birds.



Impact BIO-2 California horned lark and monarch butterflies, both locally sensitive animal species, were not observed in the project area during surveys, but may occur within 5 miles of the project area. If present during construction, individuals could potentially be adversely affected. This would be a Class II, *significant but mitigable*, impact.

The locally sensitive California horned lark was not observed during the July 2019 survey, but may occur in the project area based on its location and conditions. Nesting habitat for this species includes agricultural row crops where stubble or short vegetation is present. If construction activities occur during the bird nesting season, the proposed project could directly or indirectly affect the horned lark, which is protected under the Migratory Bird Treaty Act and the CFGC 3503. Mitigation measures BIO-1(a) and BIO-1(b) would mitigate potentially significant impacts related to the potential presence or nesting of the California horned lark and would ensure compliance with the Migratory Bird Treaty Act and CFGC.

The project area has not been documented as a monarch butterfly overwintering site, and the trees in the windrow do not represent suitable habitat for overwintering. However, the windrow is moderately suitable habitat for the temporary aggregation (resting) of monarch butterflies during migration to more permanent overwintering sites. While it is not expected that the project area is used for overwintering, it is possible that monarch butterflies could occur in the windrow in temporary aggregations. The potential to disturb monarch butterflies or their habitat is a significant impact.

Mitigation Measures. Mitigation measures BIO-1(a) and BIO-1(b) listed under Impact BIO-1 are required and would reduce impacts to California horned lark to a less than significant level. Mitigation measures BIO-2(a) and BIO-2(b) are intended to mitigate potentially significant impacts relating to the presence of aggregating monarch butterflies.

BIO-2(a) Monarch Butterfly Survey. If tree removal occurs during the aggregation season (September through December), a qualified biologist (a person with a biology degree and/or established experience with butterflies) shall determine the presence/absence of monarch butterfly activity in the project area. At a minimum, one survey shall be performed no more than one week prior to initial tree removal. A copy of the biologist contract for these services shall be submitted to the Community Development Department for review and approval prior to issuance of grading permits. A report summarizing the findings of the survey and the recommendations shall be provided to the Community Development Department prior to tree trimming/removal activities and grading activities shall not commence until the Community Development Department provides an authorization to proceed directive. A preconstruction meeting shall occur prior to tree removal and shall include the project proponent or designee, the construction foreman, City staff, and the City-approved biologist. Work may be redirected to other areas by the



Community Development Director as recommended by the biologist.

BIO 2(b) Establishment of Appropriate Buffers. If temporary aggregation activity is observed, a 100-foot buffer shall be established until after the aggregation season or until the monarchs have left the project area.

Significance After Mitigation. With implementation of BIO 1(a) and BIO 1(b) listed under Impact BIO-1, potential impacts to the California horned lark would be reduced to a less than significant level. With the implementation of BIO 2(a) and BIO-2(b), potential impacts to the monarch butterfly would be reduced to a less than significant level.

Impact BIO-3 Irrigation ditches are present in the project area and along Teal Club Road west of Patterson Road. However, these do not appear to be jurisdictional and do not contain riparian habitat or sensitive species. Impacts to jurisdictional areas would be Class III, less than significant.

Irrigation drainage ditches surround and bisect the project area. The ditches are not natural hydrological features and have been created for agricultural purposes. The ditches are frequently maintained and are left un-vegetated. Adjacent to some portions of the ditches sparse upland non-native vegetation (such as summer mustard) is present. Therefore, the ditches do not contain wetlands, riparian habitat, or special status species. Drainage from the project area flows along the plowed row crops to the shallow above ground ditches then is conveyed under unpaved access roads by small diameter culverts of various sizes and materials. Drainage is then directed toward a 24-inch arched corrugated metal pipe culvert under Patterson Road in the southwest corner of the project area. These ditches do not appear to be jurisdictional and, as noted above, none of the ditches contain wetlands, riparian habitat, or special status species. Therefore, alteration of the drainages would not result in any significant environmental effects related to biological resources.

Despite the lack of biological habitat in project area ditches, it should be noted that USACE could take jurisdiction over one or more of the ditches. This would make any alteration of the ditches subject to permit requirements of the USACE under Section 404 of the Clean Water Act. The proponent for any individual project area development that would alter a potentially jurisdictional ditch would be required to consult with USACE prior to development that would affect the ditches to determine whether any component of the project would be subject to permit requirements. In addition, CDFW could potentially take jurisdiction over project area ditches and require a Streambed Alteration Agreement from the CDFW pursuant to Section 1600 et. seq. of the CFGC for individual project area proponents. Future project proponents in the project area would need to consult with USACE and/or CDFW as appropriate regarding jurisdiction and, if any affected ditches are determined to be jurisdictional, would need to comply with applicable permit/agreement requirements.

Mitigation Measures. No mitigation is required. Development in the Specific Plan planning areas that involve developments on drainage ditches may need to comply with the requirements of an applicable 404 permit and/or Streambed Alteration Agreement if either the USACE or CDFW elects to take jurisdiction of one or more project area drainage ditches.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. Section 15130 of the *CEQA Guidelines* provides guidance on the discussion of cumulative impacts. Two conditions apply to determine the cumulative effect of a project: first, the overall effect on biological resources caused by existing and known or forecasted projects must be considered significant under the thresholds discussed above; and second, the project must have a “cumulatively considerable” contribution to that effect. The following are considered with respect to analyzing cumulative impacts to biological resources:

- *The cumulative contribution of other approved and proposed projects to fragmentation of open space in the project vicinity;*
- *The loss of sensitive habitats and species;*
- *Contribution of the project to urban expansion into natural areas; and*
- *Isolation of open space within the vicinity by proposed/future projects.*

The City of Oxnard 2030 General Plan Program EIR (certified 2011) concludes that impacts related to a variety of special status and common plant and wildlife species, sensitive natural communities, protected wetlands and other waters, as well as to wildlife habitat, nursery sites, or movement corridors could occur. However, compliance with 2030 General Plan policies related to protection of biological resources were determined to reduce these impacts to a less than significant level. Therefore, implementation of the 2030 General Plan would not result in cumulative biological resources impacts.

The proposed project is consistent with development analyzed in the 2030 General Plan. The areas surrounding the project area are already built out or are agricultural fields. Development proposed in the TCSP area would be on agricultural fields and the additional Annexation area would involve development of land previously developed. The proposed project would be an extension of the existing development of the area and would not result in significant fragmentation of open space in the project vicinity. As such, no additional loss of habitats or sensitive species is expected. The proposed project, when combined with the approved and pending projects, would not increase urban expansion into natural areas or allow for isolated open space within the project boundaries. The impacts on vegetation and wildlife habitat as a result of the proposed project would not cumulatively contribute to the loss of these resources in the region. Additionally, all proposed mitigation measures shall address any potentially significant project and cumulative impacts. Potential impacts from future development would be addressed on a case-by-case basis, subject to CEQA review as part of future discretionary permits, and appropriate mitigation would be designed to mitigate impacts resulting from individual projects. Therefore, no significant cumulative impacts would occur and the proposed project’s impacts would not be cumulatively considerable.



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4.5 GEOLOGY AND SOILS

This section assesses potential impacts relating to geologic and soil hazards. The discussion below is based on a geological “due diligence” investigation prepared by Geolabs in 2004 (Appendix D) and other sources referenced herein. Because the geologic conditions of the site have not changed, this report is still valid.

4.5.1 Setting

a. Regional Geologic Setting. California is divided geologically into several physiographic or geomorphic provinces, including the Sierra Nevada range, the Central (Great) Valley, the Transverse Ranges, the Coast Ranges, and others. The TCSP area and additional Annexation area south of Teal Club Road are within the Transverse Range geomorphic province of California. The Transverse Range includes Ventura County and portions of Los Angeles, San Bernardino, and Riverside counties.

The Transverse Range was formed at the intersection of two tectonic plates: the Pacific and the North American plates. The compressive and shearing motions between the tectonic plates resulted in a complex system of active strike-slip faults, reverse faults, thrust faults and related folds (bends in rock layers). Locally, the Transverse Ranges are characterized by east-west trending mountains and faults. Major basins and ranges in the Transverse Ranges include the Ventura basin and the San Gabriel and San Bernardino Mountains.

b. Seismic Setting. The project area is located in a highly active earthquake region of Southern California and thus is subject to various seismic and geologic hazards, including ground shaking, surface rupture, and landslides. Each potential geological hazard is described below.

c. Seismic Hazards. Faults generally produce damage in two ways: ground shaking and surface rupture. Seismically induced ground shaking covers a wide area and is greatly influenced by the distance of a site to the seismic source, soil conditions, and depth to groundwater. Surface rupture is limited to very near the fault. Other hazards associated with seismically induced ground shaking include earthquake-triggered landslides, liquefaction, and settlement. As with any location in Southern California, in the event of a strong or major earthquake, damage to onsite structures could be severe and loss of life could occur.

Faulting. A fault is a plane or surface in the earth along which failure has occurred and materials on opposite sides have moved relative to one another in response to the accumulation and release of stress. The U.S. Geological Survey defines active faults as those that have had surface displacement within Holocene time (about the last 11,000 years). Holocene surface displacement can be recognized by the existence of cliffs in alluvium, terraces, offset stream courses, fault troughs and aligned saddles, sag ponds, and the existence of steep mountain fronts. Potentially active faults are those that have had surface displacement during Quaternary time, within the last 1.6 million years. Inactive faults have not had surface displacement within the last 1.6 million years. Ground surface displacement along a fault, although more limited in area than the ground shaking associated with it, can have disastrous consequences when structures are located across or near the fault zone.



Alquist-Priolo (A-P) Earthquake Fault Zones encompass surface traces of active faults that have the potential for future surface fault rupture. A-P Fault Zones are designated within 500 feet from a known fault trace. Pursuant to the Alquist-Priolo legislation, no structure for human occupancy is permitted on the trace of an active fault. The term “structure for human occupancy” is defined as any structure used or intended for supporting or sheltering any use or occupancy, which is expected to have a human occupancy rate of more than 2,000 person-hours per year. If development is proposed within an A-P Fault Zone, a geologic study must be conducted for developments of four units or more to determine the location of the fault trace. Based on the findings in the geologic study, all structures for human occupancy must be set back a minimum of 50 feet from the fault trace because, unless proven otherwise, an area within 50 feet of an active fault is presumed to be underlain by active traces of the fault. The TCSP area and additional Annexation area are not located in an Alquist-Priolo Fault Zone (otherwise known as an Earthquake Fault Zone) and do not contain any known active or potentially active faults.

Seismically Induced Ground Shaking. Seismically induced ground acceleration is the shaking motion that is produced by an earthquake. Seismically induced ground shaking covers a wide area and is greatly influenced by the distance from the site to the seismic source, soil conditions, and depth to groundwater. Amounts of movement during an earthquake can reach up to tens of feet. Fault displacement may also occur gradually, not as a result of earthquakes, but as the nearly imperceptible continual movement known as creep. Creep can produce the rupture or bending of buildings, fences, railroads, streets, pipelines, curbs, and other linear structures.

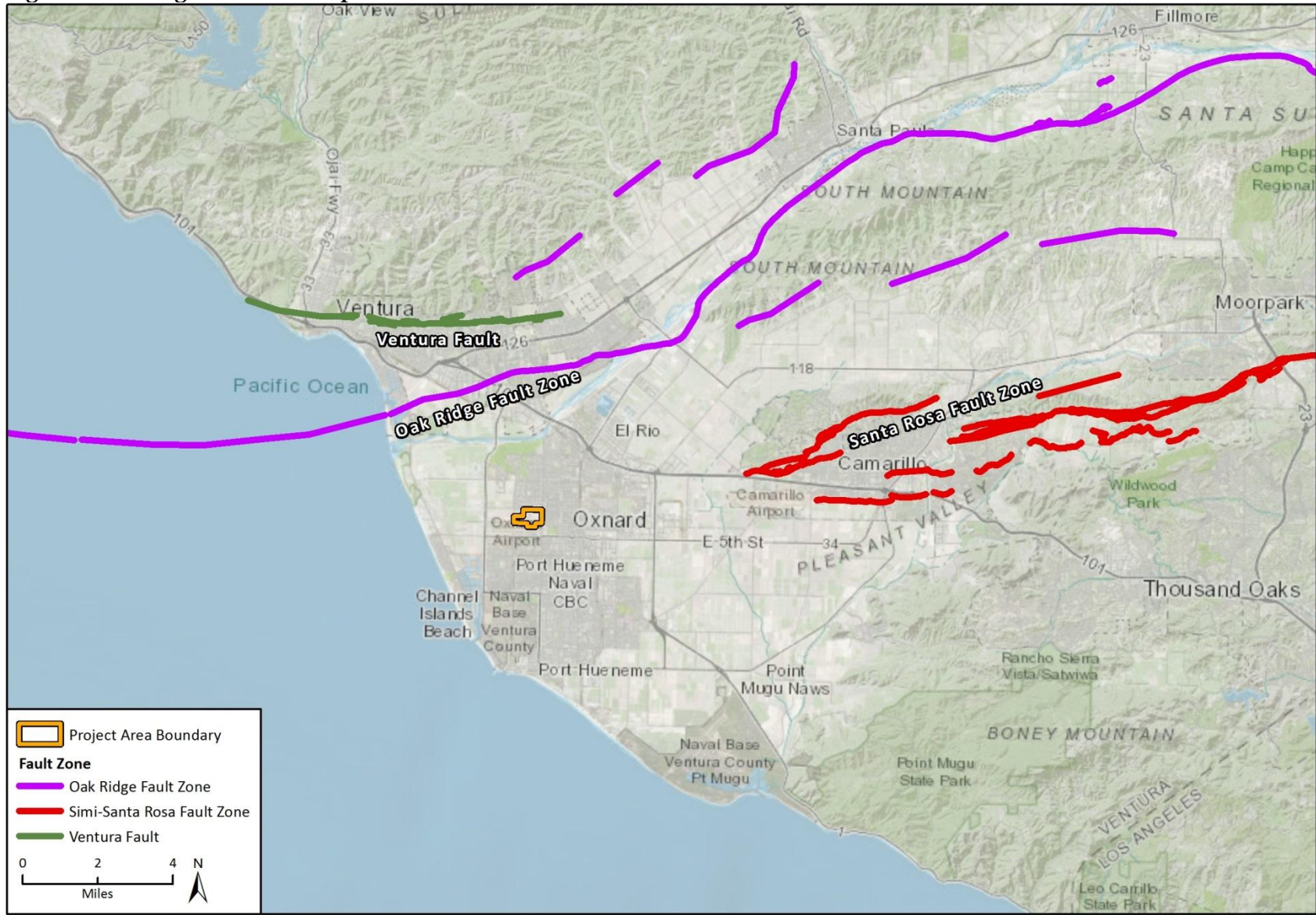
Based on California Department of Conservation earthquake regulatory maps, there are no known earthquake faults in the City of Oxnard. Several active or potentially active faults may affect Oxnard, including the San Andreas Fault, northeast of the project area, and onshore and offshore segments of the Oak Ridge Fault, which is the nearest potentially active fault. The most likely active faults to seismically affect the City and the project area are the Oak Ridge, Ventura, Simi, and San Andreas faults (Figure 4.5-1):

- *Oak Ridge Fault, located approximately 1 mile north of the project area, is considered active.*
- *Simi-Santa Rosa Fault, located approximately 5 miles east of the project area, is considered active.*
- *Ventura Fault, located approximately 6 miles north of the project area, is considered active,*
- *San Andreas Fault, located approximately 65 miles northeast of the project area, is considered active. Much of the trace of this fault is mapped as an Alquist-Priolo Earthquake Fault Zone.*

Ground Rupture. Ground surface rupture results when the movement along a fault is sufficient to cause a gap or rupture along the upper edge of the fault zone on the surface. Since there are no known active faults on or adjacent to the project area, the potential for ground rupture is considered remote (Geolabs, 2004).



Figure 4.5-1 Regional Fault Map



Imagery provided by Microsoft Bing, Esri and their licensors © 2019. Additional data provided by City of Oxnard 2007.
 Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc. Fault data provided by USGS.

Fig 4.5-1 Regional Fault Map



d. Other Geologic and Soil Related Hazards. Secondary seismic and soil related hazards include liquefaction, hydroconsolidation, expansive soils, settlement, subsidence, and hydrocompaction. These types of hazards within the project area are discussed below.

Landslides. A landslide is a perceptible downslope movement of earth mass. It is part of the continuous, natural, gravity-induced movement of soil, rock and debris. Landsliding can range from downslope creep of soil and rock material to sudden failure of entire hillsides. Landslides include rockfalls, slumps, block glides, mudslides, debris flows, and mud flows. Landsliding or slope instability may be caused by natural factors such as fractured or weak bedrock, heavy rainfall, erosion, earthquake activity, and fire, as well as by human alteration of topography and water content in the soil.

The TCSP area and additional annexation area do not contain steep slopes or other potential earthquake-induced landslide areas; areas with a previous landslide movement; or local topographic, geological, geotechnical, and subsurface water conditions with a potential for permanent ground displacements. Therefore, landsliding is not considered a potential hazard in the project area.

Liquefaction. Liquefaction is a temporary, but substantial, loss of shear strength in granular solids, such as sand, silt, and gravel, usually occurring during or after a major earthquake. This occurs when the seismic waves from an earthquake of sufficient magnitude and duration shear a soil deposit that has a tendency to decrease in volume. If drainage cannot occur, this reduction in soil volume will increase the pressure exerted on the water contained in the soil. This process can transform stable granular material into a fluid-like state. The potential for liquefaction to occur is greatest in areas with loose, granular, low-density soil, where the water table is within the upper 40 to 50 feet of the ground surface. Liquefaction can result in slope and/or foundation failure, and also post-liquefaction settlement.

Seismic hazard mapping conducted by the California Geological Survey for the Oxnard 7.5-Minute Quadrangle shows that the City is located in a State designated Liquefaction Hazard Study Zone (Geolabs, 2004).

Hydroconsolidation. Hydroconsolidation is a condition in which dry or moist soils undergo settlement upon wetting. In many cases no additional surcharge load is necessary to trigger hydroconsolidation. Soils sampled on the project area as part of the geological investigation were found to be wet due to shallow groundwater; however, none of the samples tested were found to experience substantial consolidation upon inundation. Therefore, the project area alluvial soils have low potential for hydroconsolidation (Geolabs, 2004).

Expansive Soils. Expansive soils are generally clayey and swell when wetted and shrink when dried. Wetting can occur naturally in a number of ways, (e.g., absorption from the air, rainfall, groundwater fluctuations, lawn watering and broken water or sewer lines). In hillside areas, as expansive soils expand and contract, gradual downslope creep may occur, eventually causing landsliding. Clay soils also retain water and may act as lubricated slippage planes between other soil/rock strata, also producing landslides, often during earthquakes or by unusually moist conditions.



Expansive soils are also often prone to erosion. Foundations of structures placed on expansive soils may rise during the wet season and fall during the succeeding dry season. Expansive soils can act as a lubricant when between differing soil/rock strata, which can facilitate movement triggered during heavy rains or earthquakes. Soils in the project area have very low to low expansiveness (Geolabs, 2004).

Settlement, Lateral Spreading, and Subsidence. Extreme settling or ground subsidence may result from post-liquefaction reconsolidation. Ground settlement often occurs differentially because liquefiable deposits and ground water elevations are seldom distributed evenly over broad areas. If the ground surface slopes even gently, liquefaction may lead to lateral spreading or low angle landsliding of soft saturated soils. This can result in the rapid or gradual loss of strength in the foundation materials, so that structures built upon them settle or break up as the foundation soils flow out from beneath them.

Subsidence may be caused by post-liquefaction reconsolidation. It may also be caused by groundwater withdrawal, oil or gas withdrawal, and hydroconsolidation. Groundwater withdrawal subsidence generally occurs in valley areas underlain by alluvium. This type of subsidence results from extraction of a large quantity of water from an unconsolidated aquifer. As water is removed from the aquifer, the total weight of the overburden, which the water had helped support, is placed on the alluvial structure and it is compressed. If fine-grained silts and clays make up portions of the aquifer, the additional load can squeeze the water out of these layers and into the coarser-grained portions of the aquifer. All of this compaction produces a net loss in volume and hence a subsidence of the land surface. A very similar sequence of events leads to subsidence with the oil and gas withdrawals. Hydroconsolidation subsidence can occur in dry, unconsolidated, porous, semi-arid and arid deposits that, when wetted, lose their strength and develop spontaneous settling, slumping, or cracking.

Damage caused by subsidence generally is not immediate or violent in nature. The consolidation of alluvium and settling of the land surface is a process that tends to take many years, except when prompted by seismic shaking or wetting of highly collapsible soils. However, subsidence that results from groundwater or oil and gas withdrawal can be responsible for numerous structural effects. Most seriously affected are long surface infrastructure facilities that are sensitive to slight changes in gradient, such as wells, sewers, and other underground utility lines.

Lateral spreading is unlikely on the project area and the potential settlement due to an earthquake is 0.25 inches or less (Geolabs, 2004).

Seiche. Seiches are earthquake-generated waves within enclosed or restricted bodies of water. Because no sizable lakes or reservoirs are present in or near the City, there are no seiche hazards.

e. Soil and Hydrologic Setting. The City is located on the Oxnard Plain, an alluvial plain that covers over 200 square miles in the southern portion of Ventura County. The Oxnard Plain is comprised of alluvial deposits of sands, silts and clays, which extend approximately 500 feet below the City. Historical deposition on the plain is related to Santa Clara River flood patterns. The San Pedro geologic formation is predominant in the region and underlies

alluvium to a depth of 4,500 feet. The San Pedro formation is comprised of moderately indurated sandstones and conglomerates. The Oxnard region is relatively flat, with elevations ranging from sea level to about 40 feet above mean sea level. Drainage is generally to the south toward the Pacific Ocean.

The project area is located in the Oxnard Plain Pressure Basin, which is part of the Oxnard Plain Ground Water Basin. The Oxnard Plain Pressure Basin consists of three distinct hydrogeologic units (from top to bottom) - the semi-perched aquifer and clay cap, the Upper Aquifer System, and the Lower Aquifer System. The semi-perched aquifer extends from the base of developed soil horizons to an average depth of approximately 75 feet over most of the Oxnard Plain (Ventura County Department of Public Works, Flood Control District; 1975). This aquifer consists primarily of geologically recent stream-deposited sands and gravels, with minor silt and clay interbeds. The semi-perched zone is generally of poor water quality and limited quantity. The clay cap underlies the semiperched aquifer zone and acts as an aquifer for the underlying Upper Aquifer System. The Upper and Lower Aquifer Systems have historically been used for water supply although water quality varies throughout the Basin as a result of sea water intrusion.

Near surface groundwater in the City is associated with an unconfined aquifer extending from the surface to a depth of about 7.5 feet (CGS, 2002). This upper semi-perched groundwater zone is separated from deeper aquifers by a clay-rich zone that averages over 80 feet in thickness. Ground-water recharge in the Oxnard Plain originates mainly from surface and near-surface water flow of the Santa Clara River.

Earth materials in the project area were found to consist of alluvial fan deposits to the maximum depths explored (Geolabs, 2004). The soils on the upper two to three feet of the TCSP area have been disturbed by agricultural operations and mostly consist of sandy silt and silty sand in a loose condition. Below the upper two to three feet are silt mixtures of clayey silt and silty clay transitioning to predominantly clay at a depth of seven feet.

At the time of subsurface exploration for the geological investigation (Geolabs, 2004), groundwater was encountered at a depth of approximately eight to ten feet. According to the California Geological Survey (CGS) Seismic Hazard Evaluation of the Oxnard 7.5 minute Quadrangle, Seismic Hazard Zone Report 052, the historical high groundwater table is approximately 10 to 20 feet below grade.

f. Regulatory Setting. The International Building Code (IBC), the California Building Code (CBC), the California Residential Code (CRC), and the City's 2030 General Plan and Oxnard City Code incorporate policies and measures to safeguard life, health, property and public welfare from geologic hazards. Each of these is described below:

International Building Code. The International Building Code (IBC) (2000 and later editions) is a model building code that provides the basis for the California Building Code (CBC). The IBC replaced the 1997 Uniform Building Code (UBC). The IBC derives seismic design forces from two ground motion parameters (S_s and S_1), site class, and long-period transition period (T_L). Thus, current building codes use seismic design parameters that vary



across a geographic area, as opposed to zones with distinct geographic boundaries (USGS, 2014).

California Building Code. California law provides a minimum standard for building design through the California Building Code (CBC). Chapter 23 contains specific requirements for seismic safety. Chapter 29 regulates excavation, foundations, and retaining walls. Chapter 33 contains specific requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Chapter 70 regulates grading activities, including drainage and erosion control. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in California Division of Occupational Safety and Health (Cal/OSHA) regulations (Title 8 of the California Code of Regulations [CCR]) and in Section A33 of the CBC.

California Residential Code. Similar to the CBC, the California Residential Code (CRC) provides a minimum standard for building design. However, the CRC applies only to detached one- and two-family dwellings and multiple single-family dwellings (townhouses) not more than three stories above grade plane in height. These types of structures are not required to comply with the more restrictive requirements contained in the CBC unless the proposed structure(s) exceed the design limitations established in the CRC and the code user is specifically directed to use the CBC. Chapter 4 of the CRC provides specific seismic design standards for foundations and Chapter 6 provides specific seismic design standards for walls.

Alquist-Priolo Earthquake Fault Zoning Act. The Alquist-Priolo Earthquake Fault Zoning Act was signed into law in 1972. The purpose of this Act is to prohibit the location of most structures for human occupancy across the traces of active faults and to thereby mitigate the hazard of fault rupture. Under the Act, the State Geologist is required to delineate "Earthquake Fault Zones" along known active faults in California. Cities and counties affected by the zones must regulate certain development projects in the zones. They must withhold development permits for sites in the zones until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting.

Seismic Hazards Mapping Act. The California Geologic Survey, formerly the California Department of Conservation, Division of Mines and Geology (CDMG), provides guidance with regard to seismic hazards. Under CDMG's Seismic Hazards Mapping Act (1990), seismic hazard zones are to be identified and mapped to assist local governments in land use planning. The intent of this publication is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes. In addition, CDMG's Special Publications 117, "Guidelines for Evaluating and Mitigating Seismic Hazards in California," provides guidance for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations.

City of Oxnard Regulations. The Oxnard 2030 General Plan contains policies intended to reduce the potential for geologic hazards to adversely affect people and property, including the following:



- 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.*

The Oxnard City Code (OCC) adopts the most recent CBC and contains additional requirements for construction in the City (OCC Chapter 14, Building Regulations). The City's building codes set procedures and limitations for design of structures based on seismic risk.

4.5.2 Impact Analysis

a. Significance Thresholds. According to City's 2017 *Threshold Guidelines*, development in the project area would result in potentially significant impacts if the project would:

1. *Expose of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - a. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist or based on other substantial evidence of a known fault;*
 - b. *Strong seismic groundshaking that cannot be addressed through compliance with standard Code requirements?*
2. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse that cannot be addressed through compliance with standard code requirements?*
3. *Be located on expansive soil, creating substantial risks to life or property that cannot be addressed through compliance with standard Code requirements?*
4. *Expose people or structures to inundation by seiche or tsunami?*
5. *Rely on dredging or other maintenance activity by another agency that is not guaranteed to continue?*



Potential soil erosion impacts are discussed in Section 4.6, Hydrology and Water Quality. The project site is surrounded by urban and agricultural land and would not be subject to inundation by seiche or tsunami. The nearest water body to the project site is the Pacific Ocean, approximately 2.5 miles west. No dredging or maintenance activities are included in the proposed project. Therefore, impacts related to exposure of people or structures to inundation by seiche or tsunami are discussed in Section 6.0, *Effects Found Not to Be Significant*. The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.5-1 lists the thresholds under consideration in the geology and soils whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.5-1
 Summary of Geology and Soils Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Expose of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist or based on other substantial evidence of a known fault; b. Strong seismic groundshaking that cannot be addressed through compliance with standard Code requirements?			X	
2. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse that cannot be addressed through compliance with standard code requirements?		X		
3. Be located on expansive soil, creating substantial risks to life or property that cannot be addressed through compliance with standard Code requirements?		X		
4. Expose people or structures to inundation by seiche or tsunami?			X	
5. Rely on dredging or other maintenance activity by another agency that is not guaranteed to continue?			X	

Impact GEO-1 Seismically-induced ground failure or ground shaking could result in the exposure of people and structures to the risk of loss, injury, or death. However, mandatory compliance with applicable City of Oxnard and California Building Code or California Residential Code requirements would reduce impacts to a Class III, *less than significant*, level.



The project area contains no known active or potentially active faults, nor is it within an Alquist-Priolo Fault Rupture Hazard Zone (Based on review of Department of Conservation fault zone maps and Geolabs, 2004). Therefore, the potential for ground rupture is considered low (Geolabs, 2004).

Nearby active and potentially active faults can generate groundshaking that could adversely affect the TCSP area and the additional Annexation area. The proximity of active faults is such that the area has experienced strong seismically induced ground motion and will likely experience strong seismically induced ground motion in the future. The project area is located approximately 1 mile from the Oakridge (onshore) fault, 5 miles from the Camarillo (Simi/Santa Rosa) fault, 6 miles from the Ventura fault, and 65 miles from the San Andreas Fault.

Geolabs modeled peak horizontal ground acceleration with a 10% probability of occurrence at the project area over 50 years as 0.62g. Besides the direct physical damage to structures caused by ground shaking, slopes and inadequately compacted fill material could move and cause additional damage. Gas, water, and electrical lines could be ruptured due to groundshaking, or broken during movement of earth caused by ground shaking, which could jeopardize public safety.

Development of the TCSP area and additional Annexation area would be subject to the requirements of the IBC and the CBC or CRC (depending on the type of building under construction), which includes site preparation and construction measures to ensure that the design and construction of new structures are engineered to withstand the expected ground acceleration that may occur in the project area. The geological investigation (Geolabs, 2004) concludes that compliance with standard IBC and CBC/CRC construction methods would minimize impacts to structural development from potential groundshaking.

The TCSP area and additional Annexation area does not contain steep slopes or other potential earthquake-induced landslide areas. In addition, the project area does not contain areas where the previous occurrence of landslide movement, or local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacements. Thus, landsliding is not a potential hazard in the project area. As such, impacts due to seismic hazards would be less than significant.

Mitigation Measures. With required adherence to existing regulations, impacts related to seismic hazards would be less than significant without mitigation.

Significance After Mitigation. The risk of ground shaking from an earthquake with higher ground accelerations can never be completely eliminated. Any structure built in California is susceptible to failure due to seismic activity. However, implementation of the most recent industry standards for structural design, as required in the IBC and CBC or CRC, would reduce the potential to a less than significant level without project-specific mitigation.



Impact GEO-2 The TCSP area and additional Annexation area is in a State designated Liquefaction Hazard Zone. In addition, near-surface alluvial soils in the project area are not considered suitable to support structures and expansive soils may be present. However, geotechnical engineering solutions are available to remediate these issues and development of the residential and other uses envisioned in the TCSP and additional Annexation area would be feasible from a geotechnical perspective. Mitigation Measure GEO-2 would reduce impacts to a Class II, *significant but mitigable*, level.

Liquefaction is a condition where the soil undergoes a deformation due to the build-up of high porewater pressures. The possibility of liquefaction occurring depends on the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size and density and pressures of the soil. The project area is located in a State designated Liquefaction Hazard Study Zone. The geological investigation (Appendix D to this EIR) found groundwater present at the upper 50 feet of the soil profile. Thin zones of coarse-grained soils were encountered in a medium-dense state. These thin zones have a potential to liquefy; however, the zones of liquefiable material are thin and at sufficient depths that surface manifestations from liquefaction of these zones are not anticipated to adversely affect planned structures.

Because liquefiable soils are present in the TCSP area, there is also a potential for liquefaction-induced settlement and later spreading to occur. However, the TCSP geological investigation concludes that lateral spreading is considered unlikely. The potential for liquefaction-induced settlement would be on the order of 0.25 inches or less.

The TCSP geological investigation concludes that onsite near-surface alluvial soils appear loose to medium dense and disturbed. These materials are not considered suitable to support structures or engineered fill. Therefore, impacts are potentially significant.

In addition, preliminary information contained in the TCSP geological investigation found that materials near the finished pad grade are in the very low to low expansion index range. However, the geological investigation recommends that laboratory testing to verify the expansive properties of the near-pad-grade materials should be performed at the completion of rough grading. Therefore, impacts related to expansive soils are potentially significant.

Mitigation Measures. Mitigation Measure GEO-2 would be required to reduce the potential for soil instability.

GEO-2 Geotechnical Recommendations. All recommendations contained in the TCSP geological “due diligence” investigation conducted by Geolabs in 2004 (Appendix D of this EIR) shall be followed for future development proposals in the TCSP area and the annexation area south of Teal Club Road. These recommendations include the following, unless superseded by a project-specific geotechnical report reviewed and approved by the City’s Building and Engineering Services Division:



- *A uniform blanket of compacted fill shall be created for support of structural footings in the alluvial area.*
- *Areas that are to be paved shall be scarified to at least 12 inches below existing or rough grade (whichever is deeper), brought to near material's optimum moisture content, and compacted to appropriate relative compaction.*
- *Areas with disturbed materials and areas to support structures shall be improved by over excavating the unsuitable materials and replacing them with engineered fill.*
- *Any import materials that are to be used as structural fill shall be approved by a qualified geotechnical engineer prior to placement.*
- *Compressible soils that lie within areas to receive engineered fill shall be removed to relatively incompressible material, moisture conditioned, and replaced as properly compacted fill.*
- *Conduct laboratory testing to verify the expansive properties of the near-pad-grade materials shall be performed at the completion of rough grading.*
- *Supplemental subsurface investigations shall be performed for each specific development project within the project area to more thoroughly evaluate the materials within the site and update/augment the measures listed above as appropriate. These reports shall be submitted for City review and approval prior to issuance of grading or building permits within the project area. All recommendations of the supplemental investigations shall be incorporated into approved grading and construction plans.*

Significance After Mitigation. Implementation of Mitigation Measure GEO-2 would ensure future development would incorporate design features to reduce the potential for impacts associated with development on unstable soils. Therefore, impacts would be less than significant with mitigation.

c. Cumulative Impacts. The City of Oxnard 2030 General Plan EIR found that implementation of the General Plan would result in less than significant impacts related to geology and soils. Cumulative development in the City would accommodate a population within a range of 238,000 to 286,000 people in Oxnard by 2030, depending on household size and other demographic factors. Development to accommodate this population growth would expose new residents and property to potential seismic and soil hazards similar to those identified above. However, seismic and soil hazards would be addressed on a project-by-project basis through preparation of required soils and geotechnical engineering studies and adherence to recommendations therein, as well as adherence to the existing City and State regulations, including the IBC, CBC, and/or CRC depending on the type of structure. Cumulative impacts associated with General Plan buildout were found to be less than significant. The potential impacts associated with buildout of the TCSP area and additional Annexation area can be mitigated to a less than significant level and geologic hazards to which future project area developments would be exposed would be addressed on a case-by-case basis; therefore, the proposed project's impacts contribution to cumulative impacts would not be cumulatively considerable.



4.6 GREENHOUSE GAS EMISSIONS/CLIMATE CHANGE

This section includes a discussion of climate change, its causes and the contribution of human activities, as well as a summary of existing greenhouse gas (GHG) emissions. The section describes the criteria for determining the significance of climate change impacts, and estimates the likely greenhouse gas emissions that would result from vehicular traffic and other emission sources. Where appropriate, mitigation measures are recommended to reduce impacts related to the proposed Teal Club Specific Plan (TCSP) and buildout of the additional Annexation area south of Teal Club Road with industrial land uses. Traffic projections used in emissions estimates are based on the traffic study prepared for the project (Appendix I to this EIR). GHG emissions modeling results and calculations are included in Appendix C.

4.6.1 Setting

a. Climate Change and Greenhouse Gases. Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95% or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-20th century (IPCC,2014).

Gas that absorbs and re-emits infrared radiation in the atmosphere is called greenhouse gas (GHG). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHG because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Observations of CO₂ concentrations, globally-averaged temperature, and sea level rise are generally well within the range of the extent of the earlier IPCC projections. The recently observed increases in CH₄ and N₂O concentrations are smaller than those assumed in the scenarios in the previous assessments. Each IPCC assessment has



used new projections of future climate change that have become more detailed as the models have become more advanced.

Man-made GHGs, many of which have greater heat-absorption potential than CO₂, include fluorinated gases and sulfur hexafluoride (SF₆) (United States Environmental Protection Agency [U.S. EPA] 2019). Different types of GHG have varying global warming potential (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHG absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as “carbon dioxide equivalent” (CO₂E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane CH₄ has a GWP of 25, meaning its global warming effect is 25 times greater than carbon dioxide on a molecule per molecule basis (IPCC, 2007).

The accumulation of GHG in the atmosphere regulates the earth’s temperature. Without the natural heat trapping effect of GHG, Earth’s surface would be about 34° C cooler (CalEPA, 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations. The following discusses the primary GHG of concern.

Carbon Dioxide. The global carbon cycle is made up of large carbon flows and reservoirs. Billions of tons of carbon in the form of CO₂ are absorbed by oceans and living biomass (i.e., sinks) and are emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium, carbon fluxes among these various reservoirs are roughly balanced (U.S. Department of State, 2002). CO₂ was the first GHG demonstrated to be increasing in atmospheric concentration, with the first conclusive measurements being made in the second half of the 20th century. Concentrations of CO₂ in the atmosphere have risen approximately 40% since the industrial revolution. The global atmospheric concentration of CO₂ has increased from a pre-industrial value of about 280 parts per million (ppm) to 391 ppm in 2011 (IPCC, 2007; Oceanic and Atmospheric Association [NOAA], 2010). The average annual CO₂ concentration growth rate was larger between 1995 and 2005 (average: 1.9 ppm per year) than it has been since the beginning of continuous direct atmospheric measurements (1960–2005 average: 1.4 ppm per year), although there is year-to-year variability in growth rates (NOAA, 2010). Currently, CO₂ represents an estimated 74% of total GHG emissions (IPCC, 2007). The largest source of CO₂ emissions, and of overall GHG emissions, is fossil fuel combustion.

Methane. Methane (CH₄) is an effective absorber of radiation, though its atmospheric concentration is less than that of CO₂ and its lifetime in the atmosphere is limited to 10 to 12 years. It has a GWP approximately 25 times that of CO₂. Over the last 250 years, the concentration of CH₄ in the atmosphere has increased by 148% (IPCC, 2007), although emissions have declined from 1990 levels. Anthropogenic sources of CH₄ include enteric fermentation associated with domestic livestock, landfills, natural gas and petroleum systems, agricultural activities, coal mining, wastewater treatment, stationary and mobile combustion, and certain industrial processes (U.S. EPA, 2016).



Nitrous Oxide. Concentrations of nitrous oxide (N₂O) began to rise at the beginning of the industrial revolution and continue to increase at a relatively uniform growth rate (NOAA, 2016). N₂O is produced by microbial processes in soil and water, including those reactions that occur in fertilizers that contain nitrogen, fossil fuel combustion, and other chemical processes. Use of these fertilizers has increased over the last century. Agricultural soil management and mobile source fossil fuel combustion are the major sources of N₂O emissions. The GWP of nitrous oxide is approximately 298 times that of CO₂ (IPCC, 2007).

Fluorinated Gases (HFCS, PFCS and SF₆). Fluorinated gases, such as hydrofluorocarbon (HFC), perfluorocarbon (PFC), and sulfurhexafluoride (SF₆), are powerful GHG that are emitted from a variety of industrial processes. Fluorinated gases are used as substitutes for ozone-depleting substances such as chlorofluorocarbon (CFC), hydrochlorofluorocarbon (HCFC), and halon, which have been regulated since the mid-1980s because of their ozone-destroying potential and are phased out under the Montreal Protocol (1987) and Clean Air Act Amendments of 1990. Electrical transmission and distribution systems account for most SF₆ emissions, while PFC emissions result from semiconductor manufacturing and as a by-product of primary aluminum production. Fluorinated gases are typically emitted in smaller quantities than CO₂, CH₄, and N₂O, but these compounds have much higher GWPs. SF₆ is the most potent GHG the IPCC has evaluated.

Greenhouse Gas Emissions Inventory. Worldwide anthropogenic emissions of GHGs were approximately 46,000 million metric tons (MMT, or gigaton) CO₂E in 2010 (IPCC, 2014). CO₂ emissions from fossil fuel combustion and industrial processes contributed about 65% of total emissions in 2010. Of anthropogenic GHGs, carbon dioxide was the most abundant accounting for 76% of total 2010 emissions. Methane emissions accounted for 16% of the 2010 total, while nitrous oxide and fluorinated gases account for 6 and 2% respectively (IPCC, 2014).

Total U.S. GHG emissions were 6,456.7 MMT CO₂E in 2017 (U.S. EPA, 2019). Total U.S. emissions have increased by 1.3% since 1990; emissions decreased by 0.5% from 2016 to 2017. The decrease from 2016 to 2017 was a result of multiple factors, including: (1) a continued shift from coal to natural gas and other non-fossil energy sources in the electric power sector and (2) milder weather in 2017 resulting in overall decreased electricity usage. Since 1990, U.S. emissions have increased at an average annual rate of 0.05%. In 2017, the transportation and industrial end-use sectors accounted for 29% and 30% of CO₂ emissions (with electricity-related emissions distributed), respectively. Meanwhile, the residential and commercial end-use sectors accounted for 15% and 16% of CO₂ emissions, respectively (U.S. EPA, 2019).

Based upon the California Air Resources Board (ARB) California Greenhouse Gas Inventory for 2000-2016 (ARB, 2019), California produced 424.1 MMT CO₂E in 2017. The major source of GHG in California is transportation, contributing 41% of the state's total GHG emissions. The industrial sector is the second largest source, contributing 24 percent of the state's GHG emissions, and electric power accounted for approximately 15 percent. California emissions are due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. In 2016, the State of California achieved its 2020 GHG emission reduction targets as emissions fell below 431 MMT of CO₂e (CARB 2018). The annual 2030 statewide target emissions level is 260 MMT of CO₂e (CARB 2017). With implementation of the



2017 Scoping Plan, regulated GHG emissions are projected to decline to 260 MMT of CO₂e per year by 2030. Per Executive Order (EO) B-55-18, the statewide goal for 2045 is to achieve carbon neutrality and maintain net negative emissions thereafter. This goal supersedes the 2050 goal of an 80 percent reduction in GHG emissions below 1990 levels established by EO S-3-05, and CARB has been tasked with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

Potential Effects of Climate Change. Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Long-term trends have found that each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature (GMST) for the decade from 2006 to 2015 was approximately 0.87°C (0.75°C to 0.99°C) higher than the average GMST over the period from 1850 to 1900. Several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations are in agreement that LSAT as well as sea surface temperatures have increased. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC, 2014; 2018).

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include loss in water supply from snow pack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years (State of California 2018). While there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state as well as regionally-specific climate change case studies (State of California 2018). Below is a summary of some of the potential effects that could be experienced in California as a result of climate change.

Sea Level Rise. According to *The Impacts of Sea-Level Rise on the California Coast*, prepared by the California Climate Change Center (CCCC) (May 2009), climate change has the potential to induce substantial sea level rise in the coming century. The rising sea level increases the likelihood and risk of flooding. Sea levels are rising faster now than in the previous two millennia, and the rise is expected to accelerate, even with robust GHG emission control measures. The most recent IPCC report (2013) predicts a mean sea-level rise of 11-38 inches by 2100. This prediction is more than 50% higher than earlier projections of 7-23 inches, when comparing the same emissions scenarios and time periods. The previous IPCC report (2007) identified a sea level rise on the California coast over the past century of approximately eight inches. Based on the results of various climate change models, sea level rise is expected to continue. The California Climate Adaptation Strategy (December 2009) estimates a sea level rise of up to 55 inches by the end of this century.



Air Quality. Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (California Energy Commission [CEC], March, 2009).

Water Supply. Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future water supplies in California. However, the average early spring snowpack in the Sierra Nevada decreased by about 10% during the last century, a loss of 1.5 million acre-feet of snowpack storage. During the same period, sea level rose eight inches along California's coast. California's temperature has risen 1°F, mostly at night and during the winter, with higher elevations experiencing the highest increase. Many Southern California cities have experienced their lowest recorded annual precipitation twice within the past decade. In a span of only two years, Los Angeles experienced both its driest and wettest years on record (California Department of Water Resources [DWR], 2008; CCCC, May 2009).

This uncertainty complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The Sierra snowpack provides the majority of California's water supply by accumulating snow during the state's wet winters and releasing it slowly during the state's dry springs and summers. Based upon historical data and modeling DWR projects that the Sierra snowpack will experience a 25 to 40% reduction from its historic average by 2050. Climate change is also anticipated to bring warmer storms that result in less snowfall at lower elevations, reducing the total snowpack (DWR, 2008).

Hydrology. As discussed above, climate change could potentially affect: the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys and land gauges, was approximately 3.2 mm per year, which is double the observed 20th century trend of 1.6 mm per year (World Meteorological Organization [WMO], 2013). As a result, sea levels averaged over the last decade were about 8 inches higher than those of 1880 (WMO, 2013). Sea level rise may be a product of climate change through two main processes: expansion of sea water as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply due to salt water intrusion. Increased CO₂ emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.



Agriculture. California has a \$50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2018). Higher CO₂ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater air pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (CCCC, 2006).

Ecosystems and Wildlife. Climate change and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century (State of California 2018). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan, August 2006; State of California, 2018).

b. Regulatory Setting. The following regulations address both climate change and GHG emissions.

Federal Regulations. The United States Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) held that the U.S. EPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act.

The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines, and requires annual reporting of emissions. The first annual reports for these sources were due in March 2011. On May 13, 2010, the U.S. EPA issued a Final Rule that took effect on January 2, 2011, setting a threshold of 75,000 tons CO₂E per year for GHG emissions. New and existing industrial facilities that meet or exceed that threshold will require a permit after that date. On November 10, 2010, the U.S. EPA published the "PSD and Title V Permitting Guidance for Greenhouse Gases." The U.S. EPA's guidance document is directed at state agencies responsible for air pollution permits under the Federal Clean Air Act to help them understand how to implement GHG reduction requirements while mitigating costs for industry. It is expected that most states will use the U.S. EPA's new guidelines when processing new air pollution permits for power plants, oil refineries, cement manufacturing, and other large pollution point sources.

On January 2, 2011, the U.S. EPA implemented the first phase of the Tailoring Rule for GHG emissions Title V Permitting. Under the first phase of the Tailoring Rule, all new sources of emissions are subject to GHG Title V permitting if they are otherwise subject to Title V for another air pollutant and they emit at least 75,000 tons CO₂E per year. Under Phase 1, no sources were required to obtain a Title V permit solely due to GHG emissions. Phase 2 of the Tailoring Rule went into effect July 1, 2011. At that time new sources were subject to GHG Title



V permitting if the source emits 100,000 tons CO₂E per year, or they are otherwise subject to Title V permitting for another pollutant and emit at least 75,000 tons CO₂E per year.

On July 3, 2012 the U.S. EPA issued the final rule that retains the GHG permitting thresholds that were established in Phases 1 and 2 of the GHG Tailoring Rule. These emission thresholds determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in *Utility Air Regulatory Group v. EPA* (134 S. Ct. 2427 [2014]) held that USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology.

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

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires ARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, U.S. EPA granted the waiver of Clean Air Act preemption to California for its greenhouse gas emission standards for motor vehicles beginning with the 2009 model year. Pavley I took effect for model years starting in 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" will cover 2017 to 2025. Fleet average emission standards would reach 22% reduction by 2012 and 30% by 2016. The Advanced Clean Cars program coordinates the goals of the Low Emissions Vehicles (LEV), Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34% fewer GHGs and 75% fewer smog-forming emissions from their model year 2016 levels (ARB, 2011).

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80% below 1990 levels (CalEPA, 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA, 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the



reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc.

California's major initiative for reducing GHG emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006," signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15% reduction below 2005 emission levels; the same requirement as under S-3-05), and requires ARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires ARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO₂e. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, ARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan update defines ARB's climate change priorities for the next five years and sets the groundwork to reach post-2020 goals set forth in EO S-3-05. The update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluates how to align the State's longer-term GHG reduction strategies with other State policy priorities, such as for water, waste, natural resources, clean energy and transportation, and land use (ARB, June 2014).

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

ARB Resolution 07-54 establishes 25,000 MT of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold is just over 0.005% of California's total inventory of GHG emissions for 2004.

Senate Bill (SB) 375, signed in August 2008, enhances the state's ability to reach AB 32 goals by directing ARB to develop regional GHG emission reduction targets to be achieved from vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010, ARB adopted final regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Southern California Association of Governments (SCAG) was assigned targets of an 8% reduction in GHGs from transportation sources by 2020 and a 13% reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375

also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.”

In April 2011, Governor Brown signed SB 2X requiring California to generate 33% of its electricity from renewable energy by 2020.

Adopted on October 7, 2015, SB 350 supports the reduction of GHG emissions from the electricity sector through a number of measures, including requiring electricity providers to achieve a 50 percent renewables portfolio standard by 2030, a cumulative doubling of statewide energy efficiency savings in electricity and natural gas by retail customers by 2030.

Approved by the governor in September 2016, SB 1383 requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

- *Methane – 40% below 2013 levels*
- *Hydrofluorocarbons – 40% below 2013 levels*
- *Anthropogenic black carbon – 50% below 2013 levels*

The bill also requires CalRecycle, in consultation with the state board, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies and policies, such as SB 350 and SB 1383 (see below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with statewide per capita goals of six metric tons (MT) CO₂e by 2030 and two MT CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state’s Renewables Portfolio Standard (RPS) Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045.

Also on September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets



established by SB 375, SB 32, SB 1383, and SB 100. EO B-55-18 also tasks CARB with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

For more information on the Senate and Assembly Bills, Executive Orders, and reports discussed above, and to view reports and research referenced above, please refer to the following websites: www.climatechange.ca.gov and www.arb.ca.gov/cc/cc.htm.

California Environmental Quality Act. Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the *CEQA Guidelines* for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted *CEQA Guidelines* provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Local Regulations. The Southern California Association of Governments (SCAG) adopted a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in April 2012, which applies to the County of Ventura. The following implementation strategies are included in the SCS:

- Promoting a land use pattern that accommodates future employment and housing needs;
- Using land in ways that make developments more compact and improve linkages among jobs, housing, and major activity centers;
- Protecting natural habitats and resource areas;
- Implementing a transportation network of public transit, managed lanes and highways, local streets, bikeways, and walkways built and maintained with available funds;
- Managing demands on the transportation system (TDM) in ways that reduce or eliminate traffic congestion during peak periods of demand;
- Managing the transportation system (TSM) through measures that maximize the efficiency of the transportation network; and
- Utilizing innovative pricing policies to reduce vehicle miles traveled and traffic congestion during peak periods of demand

The County of Ventura has established a Climate Protection Plan (CPP) which includes six action areas and fifteen “Commitments to Climate Protection” (Commitments) with the goal of meeting a GHG reduction target of 15% over a 2005 baseline inventory. The Commitments include items such as integrating full-cost financial analysis and GHG consideration into the County’s Capital Planning and Budgeting process, reviewing County’s building policies to ensure use of latest environmental standards for materials and systems, capturing and storing carbon on County property, and implementing a comprehensive energy action plan (Ventura County Climate Protection Plan, 2012). No specific GHG emission thresholds are included in the CPP.

The City of Oxnard 2030 General Plan Sustainable Community Chapter (2011) includes strategies such as emphasizing pedestrian- and bicycle-friendly environments, shifting toward renewable energy sources, strategic landscaping to increase air filtration by plants, and



increasing project design efficiency to reduce GHG emissions. The City of Oxnard Energy Action Plan (EAP) includes similar strategies and a more complete list of goals to reduce energy use and associated GHG emissions (Energy Action Plan, 2013). No specific GHG emission thresholds are included in the Sustainable Community Chapter or the EAP.

4.6.2 Impact Analysis

a. Methodology and Significance Thresholds. According to the City's 2017 CEQA Guidelines, impacts related to GHG emissions from the proposed project would be significant if the project would:

1. *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment;*
2. *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases or otherwise conflict with state goals for reducing GHG emissions in California; and/or*
3. *Contribute or be subject to potential secondary effects of climate change (e.g., sea level rise, increase fire hazard).*

In addition, CEQA Guidelines Section 15064.4(b) states that a lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- *The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;*
- *Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and*
- *The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions.*

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355).

For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan). Neither VCAPCD nor the City of Oxnard has adopted GHG emissions thresholds. The VCAPCD staff has, however, examined options for GHG thresholds for CEQA documents. Among the approaches discussed, VCAPCD prefers consistency with the South Coast AQMD (SCAQMD) (VCAPCD, 2011). The SCAQMD is considering a tiered approach with locally adopted GHG reduction plans followed by GHG threshold values set to capture



90% of project GHG emissions by project type. SCAQMD's current proposed threshold for 2020 is 6.6 metric tons CO₂E/year per service population (residents and employees) for Specific Plans. Therefore, the contribution to cumulative impacts to GHG emissions and climate change of the TCSP and buildout of the additional annexation parcels with industrial land uses would be cumulatively considerable if the project would produce in excess of 6.6 metric tons CO₂E/year per service population. It is important to note that the City does not recommend adoption of this threshold for any other purpose at this time, but it is used for this analysis for the reasons noted above.

Study Methodology. Calculations of CO₂, CH₄, and N₂O emissions are provided to identify the magnitude of potential project effects. The analysis focuses on CO₂, CH₄, and N₂O because these make up 98.9% of all GHG emissions by volume (IPCC, 2007) and are the GHG emissions that the project would emit in the largest quantities. Fluorinated gases, such as HFCs, PFCs, and SF₆, were also considered for the analysis. However, because the project is a residential/commercial/industrial development, the quantity of fluorinated gases would not be significant since fluorinated gases are primarily associated with industrial processes. Emissions of all GHG are converted into their equivalent weight in CO₂ (CO₂E). Minimal amounts of other main GHG (such as CFC) would be emitted; however, these other GHG emissions would not substantially add to the calculated CO₂E amounts.

On-Site Operational Emissions. Operational emissions from energy use (electricity and natural gas use) for the project were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 software program (see Appendix C for calculations). CalEEMod estimates GHG emissions from energy use by multiplying average rates of non-residential energy consumption by the quantity of non-residential square footage entered in the land use module to obtain total projected energy use. This value is then multiplied by electricity and natural gas GHG emission factors applicable to the TCSP location and utility provider. Additionally, energy usage from residential usage was reduced by 7 percent and non-residential energy usage was reduced by 30 percent to account for the requirements of 2019 Title 24 standards (California Energy Commission 2019).

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating were calculated in CalEEMod and utilize standard emission rates from CARB, U.S. EPA, and district supplied emission factor values (CAPCOA, 2016).

Emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CalEEMod User Guide, 2016). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle). Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California. The indoor and outdoor water use consumption data for each land use subtype comes from the Pacific Institute's *Waste Not, Want Not: The Potential for Urban Water Conservation in California* (2003) (CAPCOA 2017). Based on that report, a percentage of total water consumption was dedicated to landscape irrigation, which is used to determine outdoor water use. Wastewater generation



was similarly based on a reported percentage of total indoor water use. CalEEMod does not incorporate water use reductions achieved by 2016 CalGreen (Part 11 of Title 24). New development would be subject to CalGreen, which requires a 20 percent increase in indoor water use efficiency. Thus, in order to account for compliance with CalGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations for new development.

Direct Emissions from Mobile Combustion. Emissions of CO₂ and CH₄ from transportation sources for the proposed project were quantified using the CalEEMod software model. Because the CalEEMod software program does not calculate N₂O emissions from mobile sources, N₂O emissions were quantified using the California Climate Action Registry General Reporting Protocol (January 2009) direct emissions factors for mobile combustion (see Appendix C for calculations). The estimate of total daily trips associated with the proposed project was based on the project traffic study prepared by Stantec (2019) and was calculated and extrapolated to derive total annual mileage in CalEEMod. Emission rates for N₂O emissions were based on the vehicle mix output generated by CalEEMod and the emission factors found in the California Climate Action Registry General Reporting Protocol.

A limitation of the quantitative analysis of emissions from mobile combustion is that emission models, such as CalEEMod, evaluate aggregate emissions, meaning that all vehicle trips and related emissions assigned to a project are assumed to be new trips and emissions generated by the project itself. Such models do not demonstrate, with respect to a regional air quality impact, what proportion of these emissions are actually “new” emissions, specifically attributable to the project in question. For most projects, the main contributor to regional air quality emissions is from motor vehicles; however, the quantity of vehicle trips appropriately characterized as “new” is usually uncertain as traffic associated with a project may be relocated trips from other locales. In other words, vehicle trips associated with the project may include trips relocated from other existing locations, as people begin to use the proposed project instead of similar existing schools, offices, retail stores and other land uses. Therefore, because the proportion of “new” versus relocated trips is unknown, the VMT estimate generated by CalEEMod is used as a conservative, “worst-case” estimate.

Construction Emissions. Although construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches (as discussed below in *GHG Cumulative Significance*) adequately address impacts from temporary construction activity. As stated in the *CEQA and Climate Change* white paper, “more study is needed to make this assessment or to develop separate thresholds for construction activity” (CAPCOA, 2008). Nevertheless, air districts such as the SCAQMD (2011) have recommended amortizing construction-related emissions over a 30-year period in conjunction with the proposed project’s operational emissions.

Construction of the proposed project would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. The CalEEMod software program was used to estimate emissions associated with the construction period, based on parameters such as the duration of construction activity, area of disturbance, and anticipated equipment use during construction. Due to the generally flat

topography and large area of the state, it is assumed that cut and fill will be balanced where possible. Therefore, although cut and fill would be necessary for project development, no export or import of soil to or from the TCSP area is anticipated.

Emissions were calculated separately for Phase 1, Phase 2, and the proposed annexation, to more accurately model the construction timing and its specific impacts. Applicable VCAPCD recommendations for construction were incorporated into the model, as discussed in Section 4.3, *Air Quality*. For complete results and assumptions from CalEEMod, refer to Appendix C.

Project-Specific Efficiency Threshold. Efficiency thresholds are quantitative thresholds based on a measurement of GHG efficiency for a given project, regardless of the amount of mass emissions. These thresholds identify the emission level below which new development would not interfere with attainment of statewide GHG reduction targets. A project that attains such an efficiency target, with or without mitigation, would result in less than significant GHG emissions. A locally-appropriate 2030 project-specific threshold is derived from CARB's recommendations in the 2017 Climate Change Scoping Plan Update, as discussed below.

With the release of the 2017 Climate Change Scoping Plan Update, CARB recognized the need to balance population growth with emissions reductions and in doing so, provided a new local plan level methodology for target setting that provides consistency with state GHG reduction goals using per capita efficiency thresholds. A project-specific efficiency threshold can be calculated by dividing statewide GHG emissions by the sum of statewide jobs and residents. However, not all statewide emission sources would be impacted by the proposed land use (e.g., agriculture and industrial). Accordingly, consistent with the concerns raised in the Golden Door (2018) and Newhall Ranch (2015) decisions regarding the correlation between state and local conditions, the 2030 statewide inventory target was modified with substantial evidence provided to establish a locally-appropriate, evidence-based, commercial project-specific threshold consistent with the SB 32 target.

To develop this threshold, the local planning Golden Door (2018) and Newhall Ranch (2015) area was first evaluated to determine emissions sectors that are present and would be directly affected by potential land-use changes. A description of major sources of emissions that are included in the State Scoping Plan emissions sectors and representative sources in City of Oxnard can be found in Table 4.3-1.

There are no major agricultural operations in the City. Therefore, the Agricultural emissions sector was considered locally inappropriate and was removed from the State 2030 emissions forecast. Furthermore, Industrial sector source emissions (i.e., oil, gas, and hydrogen production; refineries; general fuel use; and mining operations) would not be directly impacted by the proposed land uses; therefore, the Industrial emissions sector was removed from the State 2030 emissions forecast to retain a more conservative locally-appropriate target. Additionally, Cap and Trade emissions reductions occur independent of any local jurisdictional land use decisions and were also excluded from the locally-appropriate target.

After removing Agricultural, Industrial, and Cap and Trade emissions, the remaining emissions sectors with sources within the City of Oxnard planning area were then summed to create a locally-appropriate emissions total for a mixed residential-commercial development in City of Oxnard. This locally-appropriate emissions total is divided by the statewide 2030 service person



population to determine a locally-appropriate, project-level threshold of 3.2 MT of CO₂e per service population that is consistent with SB 32 targets, as shown in Table 4.6-1 and Table 4.6-2.

At this time, the State has codified a target of reducing emissions to 40 percent below 1990 emissions levels by 2030 (SB 32) and has developed the 2017 Scoping Plan to demonstrate how the State will achieve the 2030 target and make substantial progress toward the 2050 goal of an 80 percent reduction in 1990 GHG emission levels set by EO S-3-05. In the recently signed EO B-55-18, which identifies a new goal of carbon neutrality by 2045 and supersedes the goal established by EO S-3-05, CARB has been tasked with including a pathway toward the EO B-55-18 carbon neutrality goal in the next Scoping Plan update.

While State and regional regulators of energy and transportation systems, along with the State's Cap and Trade program, are designed to be set at limits to achieve most of the reductions needed to hit the State's long-term targets, local governments can do their fair share toward meeting the State's targets by siting and approving projects that accommodate planned population growth and projects that are GHG-efficient. The AEP Climate Change Committee recommends that CEQA GHG analyses evaluate project emissions in light of the trajectory of state climate change legislation and assess their "substantial progress" toward achieving long-term reduction targets identified in available plans, legislation, or EOs. Consistent with AEP Climate Change Committee recommendations, GHG impacts are analyzed in terms of whether the anticipated mixed residential-commercial development would impede "substantial progress" toward meeting the reduction goal identified in SB 32 and EO B-55-18. As SB 32 is considered an interim target toward meeting the 2045 State goal, consistency with SB 32 would be considered contributing substantial progress toward meeting the State's long-term 2045 goals. Avoiding interference with, and making substantial progress toward, these long-term State targets is important because these targets have been set at levels that achieve California's fair share of international emissions reduction targets that will stabilize global climate change effects and avoid the adverse environmental consequences described under Section 4.3.1, *Setting* (EO B-55-18).



**Table 4.6-1
 SB 32 Scoping Plan Emissions Sector Targets**

GHG Emissions Sector¹	2030 State Emissions Target (MMT)¹	Locally Appropriate²	Project Specific	Major Sources³
Residential and Commercial	38	Yes	Yes	Natural gas end uses, including space and water heating of buildings
Electric Power	53	Yes	Yes	Electricity uses, including lighting, appliances, machinery and heating
High GWP	11	Yes	Yes	SF ₆ from power stations, HFCs from refrigerants and air conditioning ⁴
Recycling and Waste	8	Yes	Yes	Waste generated by residential, commercial, and other facilities
Transportation	103	Yes	Yes	Passenger, heavy duty, and other vehicle emissions
Industrial	83	No	No	Oil, gas, and hydrogen production, refineries, general fuel use, and mining operations do not occur substantially within the City
Agriculture	24	No	No	Enteric fermentation, crop residue burning, and manure management do not occur substantially within the City
Cap and Trade Reductions	-60	No	No	Reductions from facilities emitting more than 10,000 MT CO _{2e} per year ⁵
Scoping Plan Target (All Sectors)	260	No	No	All emissions sectors
Locally Inapplicable Sector (Industrial)	-83	No	No	Oil, gas, and hydrogen production, refineries, general fuel use, and mining operations ⁵
Locally Inapplicable Sector (Agriculture)	-24	No	No	Enteric fermentation, crop residue burning, and manure management
Locally Inapplicable Sector (Cap and Trade)	60	No	No	Reductions from facilities emitting more than 10,000 MT CO _{2e} per year ⁵
2030 Locally Applicable Emissions Sectors	213	Yes	Yes	Emissions applicable to the local planning area

MMT = million metric tons

¹ All State targets in MMT CO_{2e}. See the 2017 Climate Change Scoping Plan, page 31 for sector details (CARB 2017).

² Locally-appropriate is defined as having significant emissions in Scoping Plan Categorization categories within the planning area.

³ See CARB GHG Emissions Inventory Scoping Plan Categorization for details, available at: <https://www.arb.ca.gov/cc/inventory/data/data.htm>

⁴ SF₆ is used primarily as an insulator in electrical substations while HFCs can be found in many residential and commercial refrigeration and air conditioning units. HFCs are in the process of being phased out through 2036 in most developed countries.

⁵ Cap and Trade is excluded as reductions will occur independent of local project land use decisions and are therefore not locally appropriate. The Cap and Trade target equates to the gap between expected emissions from all economic sectors in 2030 under the Scoping Plan Scenario (320 MMT CO_{2e}) and the state target of 260 MMT CO_{2e}.



**Table 4.6-2
 SB 32 Locally-Appropriate Project-Specific Threshold**

California 2017 Climate Change Scoping Plan	California 2030 Population (persons) ¹	43,939,333
	California 2030 Employment Projection (persons) ²	23,459,500
	Service Population (persons)	67,398,833
Locally-Appropriate 2030 Project Threshold	2030 Locally-Appropriate Emissions Sectors (MT of CO ₂ e) ³	213,000,000
	2030 Service Population (persons)	67,398,833
	2030 Service Person Target (MT of CO ₂ e per Service Person)	3.2

¹ California Department of Finance 2019.

² Average of employment range projections under implementation scenario. See CARB 2017 Climate Change Scoping Plan Update, page 55 (CARB 2017).

³ See Table 4.3-1 above.

⁴ Total of 3.16 has been rounded up per Scoping Plan general methodology. Lead agencies may determine this threshold in consistence with Scoping Plan and State GHG reduction goals as they deem appropriate, as noted in the Climate Change Scoping Plan (page 102, CARB 2017).

Service Population. The following data from Southern California Association of Governments (SCAG) was used to estimate the number of employment opportunities provided by the proposed TCSP and Annexation area (SCAG 2001):

- *“Other retail/service” land uses employ approximately 1 employee per 412 square feet and was used as a proxy for the commercial/mixed use and urban village commercial areas*
- *“R&D/Flex Space” land use employs approximately 1 employee per 277 square feet as was used as a proxy for the business research park (Pa-13 and PA-14)*
- *“Light Manufacturing” land use employs approximately 1 employee per 202 square feet and was used as a proxy for the manufacturing area south of Teal Club Road*
- *“Warehouse” land use employs approximately 1 employee per 149 square feet and was used as a proxy for the warehouse area south of Teal Club Road*

In addition, the 990 attached and detached residential units are expected to house 3,898 people (CDF 2018).¹ Therefore, the service population of the anticipated development would be approximately 6,549 persons (see Section 4.11, *Population and Housing*).²

b. Project Impacts and Mitigation Measures

Table 4.6-3 lists the thresholds under consideration in the GHG/Climate Change analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

¹ (982 net dwelling units x 3.97 people per dwelling unit)

² (60,000 square feet divided by 412 square feet per employee [146]) + (132,000 square feet divided by 277 square feet per employee [477]) + (173,804 square feet divided by 202 square feet per employee [861]) + (173,804 square feet divided by 149 square feet per employee [1,167])



**Table 4.6-3
 Summary of GHG/Climate Change Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases or otherwise conflict with state goals for reducing GHG emissions in California?			X	
3. Contribute or be subject to potential secondary effects of climate change (e.g., sea level rise, increase fire hazard)?			X	

Impact GHG-1 Development of the proposed TCSP and buildout of the additional Annexation parcels under the proposed zoning would generate additional GHG emissions beyond existing conditions. However, these emissions would be below the per capita emissions threshold for 2030 identified in the State Scoping Plan Impacts would therefore be Class III, less than significant.

To determine whether the TCSP development exceeds the per service population emission threshold in line with the State’s 2017 Scoping Plan, a quantitative analysis of GHG emissions associated with construction emissions and operational emissions from the proposed development is provided below. The following summarizes the TCSP’s overall GHG emissions based on the construction and operation of 990 dwelling units as well as non-residential uses (see Appendix C for full CalEEMod worksheets contained in the Air Quality Analysis).

Construction Emissions. Construction will be phased as described in Section 2.0, *Project Description* and would occur over several years. Based on the CalEEMod results, construction activity facilitated by the proposed project would generate an estimated total of 6,424 metric tons of CO₂E (see Table 4.6-4). Amortized over a 30-year period (the assumed life of the project), construction facilitated by the project would generate an estimated 214 metric tons of CO₂E per year.



**Table 4.6-4
 Estimated Construction-Related GHG Emissions**

Emission Source	Emissions CO₂E
Phase 1	3,640 metric tons
Phase 2	1,946 metric tons
Additional Annexation Area	839 metric tons
Total	16,424 metric tons
Amortized over 30 years	214 metric tons per year

¹ See Appendix C for calculations and for GHG emission factor assumptions.

Operational Indirect and Stationary Direct Emissions. Long-term emissions relate to area sources, energy use, solid waste, water use, and transportation. Each of these sources is discussed below.

Area Source Emissions. CalEEMod was used to calculate direct sources of air emissions located at the project site. For the planned uses within the TCSP area, this would primarily include landscape maintenance equipment, which would cause GHG emissions of approximately 12 metric tons of CO₂E per year.

Energy Use. Operation of the proposed new buildings would consume both electricity and natural gas (see Appendix C for calculations). The generation of electricity through combustion of fossil fuels typically yields CO₂, and to a smaller extent, N₂O and CH₄. As discussed above, annual electricity and natural gas emissions can be calculated using average rates of residential and non-residential energy consumption multiplied by the square footage entered in CalEEMod as well as the local utility provider’s GHG emission factors.

In accordance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards, new residential uses would be required to install photovoltaic (PV) solar panels that generate an amount of electricity equal to expected electricity usage. Therefore, based on the calculation method contained in Section 150.1(b)14, proposed development would be required to include 1,570 kW of PV solar panels, which would generate approximately 2,983,258 kWh per year (see Appendix C).

As shown in Table 4.6-5, electricity consumption associated with the project would result in approximately 1,010 metric tons CO₂E per year. Natural gas use would generate approximately 1,157 metric tons CO₂E per year. Thus, overall energy use at the project site would result in approximately 2,167 metric tons CO₂E per year.



**Table 4.6-5
 Estimated Annual Energy-Related GHG Emissions**

Emission Source	Annual Emissions CO₂E
Electricity	1,010 metric tons
Natural Gas	1,157 metric tons
Total	1,167 metric tons

See Appendix C for calculations and GHG emission factor assumptions

Solid Waste Emissions. In accordance with AB 341, it was assumed that the TCSP development would achieve at least a 25% waste diversion from landfills by 2020. It is anticipated that the development facilitated by the proposed project would generate approximately 953 tons of solid waste per year according to the CalEEMod output. As shown in Table 4.6-6, based on this estimate, this aspect of the project would result in approximately 479 metric tons of CO₂E per year.

**Table 4.6-6
 Estimated Annual Solid Waste GHG Emissions**

Emission Source	Annual Emissions CO₂E
Solid Waste	479 metric tons

See Appendix C for calculations and for GHG emission factor assumptions

Water Use Emissions. The project would use approximately 225 million gallons of water per year based on the CalEEMod output, including 143 million gallons for indoor uses and 82 million gallons for outdoor uses. Based on the amount of electricity generated in order to supply this amount of water, as shown in Table 4.6-7, this aspect of the project would result in approximately 622 metric tons of CO₂E per year.

**Table 4.6-7
 Estimated Annual GHG Emissions from Water Use**

Emission Source	Annual Emissions CO₂E
Water Use	1622 metric tons

See Appendix C for calculations and for GHG emission factor assumptions

Transportation Emissions. Mobile source GHG emissions were estimated using the project traffic study and by the total vehicle miles traveled (VMT) estimated in CalEEMod. Based on the CalEEMod estimate, the potential increase of up to 3,390 additional residents and up to 1,234 employees would result in approximately 25,349,026 new annual VMT. Table 4.6-8 shows the estimated mobile emissions of GHGs for the project based on the estimated annual VMT. As noted above, the CalEEMod model does not calculate N₂O emissions related to mobile sources. As such, N₂O emissions were quantified using guidance from CARB (CARB 2013; see Appendix A for calculations). EMFAC 2014 Emissions Inventory were obtained in a spreadsheet output



for the Ventura County region, for the TCSP’s operational year (2023), using EMFAC 2011 categories (CARB 2019). As shown in Table 4.6-8, the project would result in approximately 9,750 metric tons of CO₂E associated with mobile emissions.

**Table 4.6-8
 Estimated Annual Mobile GHG Emissions**

Emission Source	Annual Emissions CO₂E
Mobile Emissions (CO ₂ & CH ₄) ¹	9,658 metric tons
Mobile Emissions (N ₂ O) ²	92 metric tons
Total	9,750 metric tons

¹ See Appendix C for calculations in CalEEMod Model output from Air Quality Analysis

² See Appendix C for calculations according to CARB 2013

Combined Construction, Stationary and Mobile Source Emissions. Table 4.6-9 combines the construction, operational, and mobile GHG emissions associated with on-site development for the TCSP and buildout of the additional annexation parcels with industrial land uses. Construction emissions associated with construction activity (approximately 214 metric tons CO₂E) are amortized over 30 years (the anticipated life of the project). For the proposed project, the combined annual emissions would total approximately 13,245 metric tons CO₂E per year. This total represents less than approximately 0.003% of California’s total 2016 emissions of 429.4 million metric tons. The majority of the project’s GHG emissions are associated with vehicular travel (74%). However, as noted above, mobile emissions are in part a redirection of existing travel to other locations, and so are already a part of the total California GHG emissions.

**Table 4.6-9
 Combined Annual GHG Emissions**

Emission Source	Annual Emissions CO₂E
Construction	214 metric tons
Operational Area Energy Solid Waste Water	12 metric tons 2,167 metric tons 479 metric tons 622 metric tons
Mobile	9,750 metric tons
Total	13,245 metric tons
Service Population	6,549
Emissions per Service Population (MT CO ₂ E/SP/year)	2.02 metric tons
Project-Specific Efficiency Threshold (MT CO ₂ E/SP/year)	3.2
Exceed Project-Specific Threshold?	No

Note: Emission sources may not add up to total due to rounding.

Sources: See Appendix C for calculations and for GHG emission factor assumptions



Based on the increase of approximately 3,898 new residents and 2,561 employees (service population of 6,549, as discussed in Section 4.11, *Population and Housing*) that would result from the proposed TCSP and buildout of the additional Annexation parcels with industrial land uses, total GHG emissions would be approximately 2.02 metric tons CO₂E per year per service population. This would not exceed the locally-appropriate, project-specific threshold of 3.2 MT of CO₂e per service person per year. Therefore, the proposed TCSP would result in a *less than significant* increase in GHG emissions and no mitigation would be required.

Mitigation Measures. As discussed above, the proposed project would result in less than 6.6 metric tons per year CO₂E per SP; therefore, no mitigation is necessary.

Significance after Mitigation. Impacts would be less than significant without mitigation.

Impact GHG-2 With adherence to the mitigation measures included in this EIR, the proposed TCSP and buildout of the additional Annexation parcels with industrial land uses would be consistent with the statewide goals for GHG emissions reduction, as embodied in AB 32, SB 32, and SB 375, as well as the Southern California Association of Governments (SCAG) Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), the 2017 State Scoping Plan, the City of Oxnard Sustainable Community Element, and the City of Oxnard Energy Action Plan. Impacts would therefore be Class III, less than *significant*.

As discussed under Section 4.6.1, *Setting*, a number of plans have been adopted to reduce GHG emissions in the City of Oxnard and at the state level. The project's consistency with the SCAG 2016-2040 RTP/SCS, the Climate Change Scoping Plan, the City of Oxnard 2030 General Plan and the City of Oxnard Energy Action Plan (EAP) are discussed below.

SCAG 2040 RTP/SCS. To be consistent with SB 375, as described in *Regulatory Setting* above, SCAG adopted an RTP/SCS through 2040 in April 2016. The RTP/SCS does not set a VMT reduction target, but encourages VMT reduction by promoting alternative and active transportation. The proposed TCSP would be infill development that would be located within walking and biking distance of commercial and recreational activities as well as public transportation.

SCAG's 2040 RTP/SCS provides land use and transportation strategies to reduce regional GHG emissions. Major goals of the RTP/SCS include that it:

1. Align the plan investments and policies with improving regional economic development and competitiveness.
2. Maximize mobility and accessibility for all people and goods in the region.
3. Ensure travel safety and reliability for all people and goods in the region.
4. Preserve and ensure a sustainable regional transportation system.
5. Maximize the productivity of our transportation system.
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).



7. Actively encourage and create incentives for energy efficiency, where possible.
8. Encourage land use and growth patterns that facilitate transit and active transportation.
9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

The TCSP and buildout of the additional Annexation parcels with industrial land uses include components that would align with RTP/SCS goals, such as promoting a land use pattern that encourages less single-person car use by including pedestrian and bicycle-friendly communities (see Figure 2-4 in Section 2.0, *Project Description*) and creating residential land use in proximity to parks and neighborhood-supporting commercial services. Section 4.3, *Air Quality*, includes mitigation measures relating to energy efficiency to be implemented prior to the issuance of building permits. The TCSP's consistency with applicable goals and objectives from the 2040 RTP/SCS are discussed in Table 4.6-10.

**Table 4.6-10
 TCSP Consistency with Applicable SCAG 2040 RTP/SCS Goals and Objectives**

Goals and Objectives	Project Consistency
Land Use Actions and Strategies	
<p><u>Reflect the Changing Population and Demands</u> The SCAG region, home to about 18.3 million people in 2012, currently features 5.9 million households and 7.4 million jobs. By 2040, the Plan projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. High Quality Transit Areas (HQTAs) will account for three percent of regional total land, but will accommodate 46 percent and 55 percent of future household and employment growth respectively between 2012 and 2040. The 2016 RTP/SCS land use pattern contains sufficient residential capacity to accommodate the region's future growth, including the eight-year regional housing need. The land use pattern accommodates about 530,000 additional households in the SCAG region by 2020 and 1.5 million more households by 2040. The land use pattern also encourages improvement in the jobs-housing balance by accommodating 1.1 million more jobs by 2020 and about 2.4 million more jobs by 2040.</p>	<p><u>Consistent.</u> The project would result in a net increase of 982 residential units which are expected to house 3,898 residents. The project would also include a mix of residential and commercial uses, which would allow future residents to patronize the on-site businesses. New residents associated with project buildout would make up approximately 13% of the projected citywide population growth through 2035 and 2040; the net 982 housing units associated with project buildout would make up approximately 11% of the projected citywide housing growth through 2035 and 2040; and the 2,651 new jobs associated with project buildout would make up approximately 21% of the projected citywide employment growth through 2035 and 19% of projected citywide employment growth through 2040. Neither project-generated population housing nor employment estimates would exceed citywide projections (see Section 4.11, <i>Population and Housing</i>). Therefore, the project reflects the changing population and demands.</p>
<p><u>Focus New Growth Around Transit</u> The 2016 RTP/SCS land use pattern reinforces the trend of focusing growth in the region's High Quality Transit Areas (HQTAs). Concentrating housing and transit in conjunction concentrates roadway repair investments, leverages transit and active transportation investments, reduces regional life cycle infrastructure costs, improves accessibility, avoids greenfield development, and has the potential to improve public health and housing affordability. HQTAs provide households with alternative modes of transport that can reduce VMT and GHG emissions.</p>	<p><u>Consistent.</u> The proposed project would involve development in area that is served by public transit. The project involves a multi-family residential development as well as commercial components including office and retail space, a business research park, and an Urban Village which may include a café, restaurants, hair salon, mail business, dry cleaner, or copy center near public transportation. The project is located within walking distance of a Gold Coast Transit bus stop, approximately 0.15 mile east of the project site, serving bus routes 4A and 4B. In addition, as part of the 2030 General Plan update, new bus stop pull-outs would be built along Ventura Road. Ventura Road is an identified bicycle and pedestrian route, and the road would be widened and include a striped designated bike lane as part of the</p>



Goals and Objectives	Project Consistency
	<p>General Plan update. Two striped bike lanes also exist on Doris Avenue adjacent to the project site. The TCSP would be designed to connect pedestrian and bike paths with public sidewalk and streets, greenbelts and public bike lanes. Public plazas and gathering places in the commercial mixed-use area would also be designed for easy access to the pedestrian network, as described in Section 4.13, <i>Traffic</i>.</p>
<p><u>Plan for Growth Around Livable Corridors</u> The Livable Corridors strategy seeks to revitalize commercial strips through integrated transportation and land use planning that results in increased economic activity and improved mobility options. Since 2006, SCAG has provided technical assistance for 19 planning efforts along arterial roadway corridors. These corridor planning studies focused on providing a better understanding of how corridors function along their entire length. Subsequent research has distinguished the retail density and the specific kinds of retail needed to make these neighborhood nodes destinations for walking and biking.</p> <p>From a land use perspective, Livable Corridors strategies include a special emphasis on fostering collaboration between neighboring jurisdictions to encourage better planning for various land uses, corridor branding, roadway improvements and focusing retail into attractive nodes along a corridor.</p>	<p><u>Consistent.</u> The proposed TCSP would involve a mixed-use development with on-site commercial and retail opportunities along an existing transportation network. The project site is surrounded on three sides by a mix of residential, retail, manufacturing and commercial uses, and Oxnard Airport to the south. Adjacent to the TCSP on the east, Ventura Road is an identified bicycle and pedestrian route. The road would be widened and include a striped designated bike lane as part of the 2030 General Plan update. Two striped bike lanes also exist on Doris Avenue adjacent to the project site. The TCSP would be designed to connect pedestrian and bike paths with public sidewalk and streets, greenbelts and public bike lanes. Public plazas and gathering places in the TCSP's commercial mixed-use area would also be designed for easy access to the pedestrian network, as described in Section 4.13, <i>Traffic</i>. The Urban Village would be oriented around a public plaza and would be within walking distance of residential units. Further, the TCSP consists of traditional neighborhood design components that promote "porch and street orientation" and encourage walking and interaction between residents. High, Medium, and Medium-High Density areas would orient to internal pathways and common areas with connection to the public walking network and to the Urban Village. Therefore, the TCSP would support pedestrian and bicycle transportation and foster connection with local land uses and existing transit options.</p>
<p><u>Provide More Options for Short Trips</u> 38 percent of all trips in the SCAG region are less than three miles. The 2016 RTP/SCS provides two strategies to promote the use of active transport for short trips. Neighborhood Mobility Areas are meant to reduce short trips in a suburban setting, while "complete communities" support the creation of mixed-use districts in strategic growth areas and are applicable to an urban setting.</p>	<p><u>Consistent.</u> The proposed project would involve a mixed-use development with on-site commercial and retail opportunities. Commercial and retail establishments are also located east of the project site and a Gold Coast Transit bus stop is located approximately 0.15-mile to the east of the project site. Additionally, the TCSP would be designed to connect pedestrian and bike paths with public sidewalk and streets, greenbelts and public bike lanes. Public plazas and gathering places in the TCSP's commercial mixed-use area would be designed for easy access to the pedestrian network. Walking or biking would therefore be viable modes of transportation to reach numerous destinations or public transit.</p>
<p><u>Protect Natural and Farm Lands</u> Many natural and agricultural land areas near the edge of existing urbanized areas do not have plans for conservation and they are susceptible to the pressures of development. Many of these lands, such as riparian areas, have high per-acre habitat values</p>	<p><u>Consistent.</u> The TCSP area is primarily composed of agricultural land currently cultivated with row crops. As discussed in Section 4.2, <i>Agricultural Resources</i>, development of the TCSP area was assumed in the City's General Plan and impacts associated with the conversion of agricultural land were determined to be significant and unavoidable. As discussed in Section 4.4,</p>



Goals and Objectives	Project Consistency
<p>and are host to some of the most diverse yet vulnerable species that play an important role in the overall ecosystem.</p>	<p><i>Biological Resources</i>, impacts related to riparian areas were found to be less than significant.</p>
<p><u>Environment</u> California law requires that the SCAG region reduce per capita greenhouse gas emission 8 percent by 2020 and 13 percent by 2035 compared to 2005 levels. The strategies, programs and projects outlined in the RTP/SCS are projected to result in greenhouse gas emissions reductions in the SCAG region that meet or exceed these targets. The region must also meet federal air quality standards.</p>	<p><u>Consistent</u>. The transit-oriented development of the Urban Village would reduce air quality impacts by creating a community that would easily be accessed by pedestrians and would be in close proximity to alternative modes of transportation. See Section 4.3, Air Quality for mitigation measures including energy efficiency design elements and construction requirements that would reduce impacts to air quality to a less than significant level. Mitigation Measure AQ-2(a) requires payment of fees to a TDM, and Section 4.13, Transportation and Traffic, includes mitigation measures to improve intersection and roadway operations, reducing traffic and, therefore, emissions, at intersections. Mitigation measures AQ-2(b) and AQ-2(c) require that construction and building management contracts for residential development with the TCSP area include energy saving requirements, such as exceeding Title 24 requirements and use of solar or low-emission water heaters. It would also be required that all structures with flat roofs be designed to support the installation of solar panels or similar renewable energy equipment; this is a requirement of Title 24 for all newly constructed single-family residences and low-rise multifamily residential buildings, but would apply to all development proposed within the TCSP area and within the nine parcels proposed for Annexation. Mitigation Measure AQ-2(d) requires that applicants for all projects within the TCSP area and within the nine parcels proposed for Annexation include passive energy conservation elements in building design plans. Mitigation Measure AQ-2(e) requires all applicants for all projects within the TCSP area to include natural ventilation in building design plans whenever feasible. Operations and construction of the proposed TCSP would create greenhouse gas emissions consistent the state's per capita reduction threshold for 2030; therefore, this impact would be less than significant. Similarly, greenhouse gas emissions from passenger cars and light duty vehicles would be 70 percent below the 2005 SCAG threshold and exceed the RTP/SCS target of 21 percent.</p>
Transportation Strategies	
<p><u>Preserve Our Existing System</u> Southern California's transportation system is becoming increasingly compromised by decades of underinvestment in maintaining and preserving our infrastructure. These investments have not kept pace with the demands placed on the system and the quality of many of our roads, highways, bridges, transit, and bicycle and pedestrian facilities are continuing to deteriorate. Unfortunately, the longer they deteriorate the more expensive they will be to fix in the future. Even worse, deficient conditions compromise the safety of users throughout the network. For all of these reasons, system</p>	<p>Consistent. As discussed in Section 4.6 <i>Traffic</i>, the proposed TCSP development would generate trips that result in a level of service exceeding City thresholds at several intersections without mitigation. However, with mitigation measures such as added traffic signals and roadway expansion, these impacts would be reduced to a less than significant level. Further, traffic generated by buildout of the proposed TCSP and Annexation area would not exceed City level of service thresholds. The TCSP would also be consistent with the City's General Plan and Bicycle Master Plan and include development of bicycle and pedestrian facilities. The City's 2030 General Plan includes development of additional bus stops along</p>



Goals and Objectives	Project Consistency
<p>preservation and achieving a state of good repair are top priorities of the 2016 RTP/SCS.</p>	<p>Ventura Road which would serve TCSP residents and employees.</p>
<p>Active Transportation The 2016 RTP/SCS includes \$12.9 billion for active transportation improvements, including \$8.1 billion in capital projects and \$4.8 billion as part of the operations and maintenance expenditures on regionally significant local streets and roads. The Active Transportation portion of the 2016 Plan updates the Active Transportation portion of the 2012 Plan, which has goals for improving safety, increasing active transportation usage and friendliness, and encouraging local active transportation plans. It proposes strategies to further develop the regional bikeway network, assumes that all local active transportation plans will be implemented, and dedicates resources to maintain and repair thousands of miles of dilapidated sidewalks. To accommodate the growth in walking, biking and other forms of active transportation regionally, the 2016 Active Transportation Plan also considers new strategies and approaches beyond those proposed in 2012.</p>	<p><u>Consistent.</u> The proposed TCSP would include a mix of uses and is surrounded on three sides by a mix of residential, retail, manufacturing and commercial uses. The TCSP would provide bicycle facilities to serve the project's residents, employees, and visitors and would be designed to connect pedestrian and bike paths with public sidewalk and streets, greenbelts and public bike lanes (see Figure 2-4 in Section 2.0, <i>Project Description</i>). The development includes dedicated pedestrian paths and bicycle paths and would emphasize transit oriented residential development with supporting mixed uses to encourage alternate modes of transportation. This would be consistent with the City of Oxnard's General Plan and Bicycle Master Plan.</p> <p>The TCSP consists of traditional neighborhood design components that promote "porch and street orientation" and encourage walking and interaction between residents. High, Medium, and Medium-High Density areas would orient to internal pathways and common areas with connection to the public walking network and to the Urban Village. Public gathering places in the TCSP's commercial mixed-use area would also be designed for easy access to the pedestrian network, as described in Section 4.13, <i>Traffic</i>. The proposed TCSP would include an Urban Village with neighborhood-serving retail, commercial and restaurant uses with pedestrian scale design. The Urban Village would be oriented around a public plaza and would be within walking distance of residential units. The TCSP would also encourage public transportation: the nearest transit stop is located approximately 0.15 mile east of the project site, serving Gold Coast Transit bus routes 4A and 4B. Gold Coast Transit bus routes 19, 20 and 21 are approximately one mile west of the project site and provide transit service along Victoria Avenue. In addition, as part of the 2030 General Plan update, new bus stop pull-out locations on southbound and northbound lanes of Ventura Road would be built adjacent to the project site (see Section 2.0, <i>Project Description</i>). The planned bus stops and bus shelters would serve the TSCP area and would help provide public transit options. One of the TCSP objectives is to create an integrated vehicular, pedestrian and bicycle circulation system that connects residential, industrial, commercial and institutional uses within the TCSP area. The development is near the Esplanade Mall, Riverpark Town Center, and Oxnard Financial Plaza, which are existing job centers. Commercial and business research park components are also proposed to be located near existing residential uses to the north and east of the TCSP area, as well as within close proximity to the residential uses proposed as part of the Specific Plan. Lastly, Oxnard Airport is directly to the south, providing easy access to air transit for TCSP residents, employees and visitors.</p>



Goals and Objectives	Project Consistency
<p>Transit Since 1991, the SCAG region has spent more than \$50 billion dollars on public transportation. This includes high profile investments in rail transit and lower profile, vital investments in operations and maintenance. Looking toward 2040, the 2016 RTP/SCS maintains a significant investment in public transportation across all transit modes and also calls for new household and employment growth to be targeted in areas that are well served by public transportation to maximize the improvements called for in the Plan.</p>	<p><u>Consistent.</u> The proposed project would involve a mix of uses in an urbanized area that is served by public transit. Bus stops exist approximately 0.15 mile east of the project site, serving Gold Coast Transit bus routes 4A and 4B. Gold Coast Transit bus routes 19, 20 and 21 are approximately one mile west of the project site and provide transit service along Victoria Avenue. In addition, as part of the 2030 General Plan update, new bus stop pull-outs would be built along Ventura Road. As noted in Section 4.13, <i>Traffic</i>, TCSP commercial and industrial developments would also be required to provide adequate transportation demand management and trip reduction measures as required by the City's traffic and transportation manager (OMC Section 16-631).</p>
<p>Zero-Emissions Vehicles While SCAG's policies are technology neutral with regard to supporting zero and/or near zero-emissions vehicles, this section will focus on zero-emissions vehicles. Since SCAG adopted the 2012 RTP/SCS, the Governor's Office released the Zero Emissions Vehicle (ZEV) Action Plan for 2013 and 2015. These plans identified state level funding to support the implementation of Plug-in Electric Vehicle (PEV) and Hydrogen Fuel Cell refueling networks. As part of the 2016 RTP/SCS, SCAG modeled PEV growth specific to Plugin Hybrid Electric Vehicles (PHEV) in the SCAG region. These are electric vehicles that are powered by a gasoline engine when their battery is depleted. The 2016 RTP/SCS proposes a regional charging network that will increase the number of PHEV miles driven on electric power. In many instances, these chargers may double the electric range of PHEVs. A fully funded regional charging network program would result in a reduction of one percent per capita greenhouse gas emissions.</p>	<p><u>Consistent.</u> The TCSP does not identify parking space design, including electric vehicle changing spaces. However, projects developed under the TCSP are expected to comply with the 2019 CalGreen Building Standards, which require that a percentage of residential and commercial parking spaces install electric vehicle (EV) charging stations. Therefore, the TCSP is expected to support EV use and the regional EV charging network.</p>

Source: SCAG 2016.

The GHG emissions reduction targets set by CARB for the SCAG 2040 RTP/SCS are intended to contribute to achieving the statewide SB 32 goal. As a result, if the development reduces GHG emissions to a level consistent with the SB 32 target for 2030, then the development would be consistent with the SCAG 2040 RTP/SCS. As summarized in Table 4.6-10, anticipated per service person GHG emissions from development would be below the threshold set in the State Scoping Plan for 2030. Therefore, the SCSP would be consistent with the statewide SB 32 target and would be consistent with the SCAG 2040 RTP/SCS.

To additionally evaluate the TCSP's consistency with the objectives of SB 375 and the goals of the 2016-2040 RTP/SCS, per-capita CO₂ emissions from passenger and light duty vehicles were analyzed. The 2016-2040 RTP/SCS shows regional per-capita GHG emissions from passenger and light duty vehicles being reduced by 21 percent relative to 2005 levels by 2040. The 2016-2040 RTP/SCS determined that the 2005 per-capita CO₂ emissions from passenger and light duty vehicles in the SCAG region were 23.8 pounds per day.



For the proposed TCSP, per-capita CO₂ emissions from passenger cars/light duty vehicles would be 7.2 lbs/day per person, a reduction of approximately 70 percent relative to the 2005 SCAG regional baseline levels examined under SB 375 (see Appendix C for per capita mobile emissions calculation). This reduction in passenger vehicle per-capita CO₂ emissions exceeds the 21 percent reduction target of the 2016-2040 RTP/SCS as well as the CARB established SB 375 targets of a 13 percent reduction by 2035.

The 2017 Scoping Plan also states that “Since 2014, CARB has been working with MPOs and other stakeholders to update regional SB 375 targets. At the same time, CARB has conducted analysis for development of the Mobile Source Strategy and Scoping Plan that identifies the need for statewide per capita greenhouse gas emissions reductions on the order of 25 percent by 2035, to meet our climate goals.” The development’s 70 percent reduction in passenger vehicle per capita CO₂ emissions relative to the 2005 SCAG regional baseline levels examined under SB 375 would be consistent with this objective of reaching a 25 percent reduction in mobile source emissions from passenger cars by 2035, as identified in the 2017 Scoping Plan.

2017 Scoping Plan and EO B-55-18. The 2017 Scoping Plan outlines a pathway to achieving the reduction targets set under SB 32, which is considered an interim target toward meeting the State’s long-term 2045 goal established by EO B-55-18. As discussed in Section 4.6.2(b), *Significance Thresholds*, the TCSP would impede “substantial progress” toward meeting the SB 32 and EO B-55-18 targets if per service person GHG emissions exceeded the locally-appropriate, project-specific 2030 efficiency threshold. CARB’s 2017 Scoping Plan indicates that local actions that reduce vehicle miles traveled (VMT) are necessary to meet transportation sector-specific goals and achieve the 2030 GHG emission reduction target under SB 32. In its evaluation of the role of the transportation system in meeting the statewide emissions targets, CARB determined that VMT reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCSs) are necessary. According to the 2017 Scoping Plan, a 7 percent VMT reduction translates to a reduction, on average, of 1.5 miles/person/day from projected levels in 2030. To that end, the 2017 Scoping Plan recommends that local governments consider policies to reduce VMT to help achieve these reductions, including: land use and community design that reduces VMT; transit-oriented development; street design policies that prioritize transit, biking, and walking; and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.

As discussed in Table 4.6-10 and in Sections 2.0, *Project Description*, and 4.4, *Land Use and Planning*, the TCSP site is located in an urbanized area immediately adjacent to alternative transit options and within walking distance of multiple commercial opportunities which would provide a range of goods and services to site residents, employees, and visitors. Nearby commercial areas include Esplanade Mall, Riverpark Town Center, and Oxnard Financial Plaza. The proposed development also incorporates dedicated pedestrian and bicycle paths, new bus stops and bus shelters. Finally, the TCSP is a mixed-use development that provides housing, jobs, and visitor amenities in proximity to transit options, jobs, and services. Based on these facts, the TCSP is consistent with the general goal of reducing GHG emissions by reducing VMT.

The 2017 Scoping Plan also recommends that, for discretionary approvals and entitlements of individual development projects, lead agencies should prioritize on-site design features that reduce emissions, especially from VMT, and direct investments in GHG reductions. For example, CARB suggests consideration of design options that reduce VMT, promote transit-oriented development, promote street design policies that prioritize transit, biking, and walking, and increase low carbon mobility choices, including improved access to viable and affordable public transportation, and active transportation opportunities. CARB notes that additional GHG reductions can be achieved through investment in local building retrofit programs that can pay for cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting, energy efficient appliances, energy efficient windows, insulation, and water conservation measures, as well as local direct investment to finance installation of regional electric vehicle (EV) charging stations and enhancement of local urban forests.

As discussed above, the proposed TCSP is a transit-oriented development on a site located in proximity to a range of alternative transit options. Again, the site is also within walking distance of a range of goods and services. As described in Section 4.3, *Air Quality*, Mitigation Measure AQ-2(a), fees would be paid to a TDM program, and as described in Section 4.13, *Transportation and Traffic*, mitigation measures would improve intersection and roadway operations, reducing traffic and emissions at intersections. As discussed in Section 4.3, *Air Quality*, the development would be designed to meet Title 24 California Building Code energy efficiency standards and would be designed with flat roofs to support installation of solar panels or other renewable energy equipment on all buildings within the TCSP, including the nine parcels proposed for Annexation. The proposed TCSP also includes water conserving features, recycled water for all landscape irrigation, and bicycle and pedestrian amenities. Finally, it would maintain vegetative landscaping on-site with 12.3 acres of community parks and open space, 100% water wise plants in commercial and industrial use areas and at least 60% water wise plants in residential areas. Based on these design features, the TCSP would implement Climate Change Scoping Plan recommendations for individual development projects.

In order to evaluate the TCSP's consistency with the 2017 Climate Change Scoping Plan Update, this analysis includes an evaluation of development emissions against a 2030 project-specific efficiency threshold that is derived from the Scoping Plan, as discussed in Section 4.3.2(b) *Impact Analysis: Significance Thresholds*. As discussed in Section 4.3.2(b), a development would impede "substantial progress" toward meeting the SB 32 and EO B-55-18 targets if per service person GHG emissions exceeded the locally-appropriate, project-specific 2030 efficiency threshold. As discussed under Impact GHG-1, the TCSP's GHG emissions would be below the 2030 efficiency threshold of the 2017 Scoping Plan; therefore, the TCSP would not conflict with progress toward meeting the SB 32 and EO B-55-18 targets.

City of Oxnard 2030 General Plan. The 2030 General Plan specifically discusses the TCSP as one of six areas of the City designated as an Urban Village. As defined in 2030 General Plan Goal CD-7, Urban Villages are intended to support "development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity." Policy CD 7.1 of the 2030 General Plan further defines "urban villages" as follows:



CD-7.1 Establishment of Urban Villages: *Six areas of the City are initially designated as Urban Villages. It is the intent of the Urban Village designation that specific or strategic plans for each area will be prepared in advance of the planning entitlement process. Additional Urban Villages and guidelines may be subsequently adopted by the City Council. Urban Villages are envisioned as characterized by:*

- *Infill and/or development of formerly agricultural land*
- *Reinvestment in the existing community*
- *Mixture of land uses*
- *Mix of residential densities and housing types*
- *Providing a minimum of 15 percent affordable housing*
- *Location along or near corridors, downtown, and transit nodes*
- *Transit, pedestrian, and bicycle circulation given high priority*

The TCSP is further described as a residential land in close proximity to neighborhood-supporting public/semi-public uses potentially including a school, parks, and commercial services. Locating residences, schools, and neighborhood commercial services in close proximity to one another would reduce the vehicle miles traveled by residents. The GHG emissions model used for this analysis did not include any assumptions in this regard; however, such a mixture of land uses would likely reduce GHG emissions from vehicle use and would therefore be consistent with the 2030 General Plan goals including CD-1.3 Redevelopment to Mixed Use and CD-1.4 Transportation Choices.

The 2030 General Plan includes additional goals and policies that apply specifically to the Urban Village designation and to the proposed project in general, as discussed further in Section 4.9, *Land Use and Planning*. Notable among these are Goal SC-3, “Energy Generation and Increased Efficiency (Energy Action Plan) - Energy efficiency performance standards and generation from renewable sources” and its related policies applicable to the proposed project. This goal and other 2030 General Plan goals and policies are discussed in more detail in Table 4.6-11 below.

The additional nine parcels proposed for Annexation south of Teal Club Road are designated for Airport Compatible land uses, as shown on the Oxnard 2030 General Plan land use map. For this reason, the Annexation would be consistent with the 2030 General Plan.

**Table 4.6-11
 2030 General Plan Policy Consistency for GHG Emissions**

2030 General Plan Policy	Discussion
Sustainable Community	
<p><i>SC-3.1. New Residential Development. Encourage incorporation of passive and active energy and resources conservation design and devices in new residential development and substantial remodels and/or expansions.</i></p>	<p><u>Consistent.</u> Mitigation measures AQ-2(b) and AQ-2(c) require that construction and building management contracts for residential development within the TCSP area include energy saving requirements, such as exceeding Title 24 requirements and use of solar or low-emission water heaters. It would also be required that all structures with flat roofs be designed to support the installation of solar panels or similar renewable energy equipment; this is a requirement of Title 24 for all newly constructed single family residences and low-rise multifamily residential buildings, but would apply to all development proposed within the TCSP area and within the nine parcels proposed for annexation.</p>
<p><i>SC-3.8. Require Use of Passive Energy Conservation Design. As part of the City and Community EAP's, require the use of passive energy conservation by building material massing, orientation, landscape shading, materials, and other techniques as part of the design of local buildings, where feasible.</i></p>	<p><u>Consistent.</u> Mitigation Measure AQ-2(d) requires that applicants for all projects within the TCSP area and within the nine parcels proposed for Annexation include passive energy conservation elements in building design plans.</p>
<p><i>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.</i></p>	<p><u>Consistent.</u> Mitigation Measure AQ-2(e) requires all applicants for all projects within the TCSP area to include natural ventilation in building design plans.</p>
COMMUNITY DEVELOPMENT	
<p><i>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).</i></p>	<p><u>Consistent.</u> The TCSP consists of traditional neighborhood design components that promote "porch and street orientation" and encourage walking and interaction between residents. High, Medium, and Medium-High Density areas would orient to internal pathways and common areas with connection to the public walking network and to the urban village. The urban village would be oriented around a public plaza, and would be within walking distance of residential units and readily accessible to a new bus stop on Ventura Road (Section 2.0, <i>Project Description</i>).</p>
<p><i>CD 1.5. Housing Variety. Promote the development of a variety of housing types throughout the City including apartments, condominiums, lofts, townhouses, and attached and detached single family units.</i></p>	<p><u>Consistent.</u> The TCSP envisions development of up to 990 residential dwelling units in a variety of densities and product types including both market-rate and affordable housing. In addition to single-family residential units, the TCSP includes single-family courtyard homes, single-family townhomes and multi-family condominiums and apartments (Section 2.0, <i>Project Description</i>).</p>
<p><i>CD 1.9. Commute Reduction. Minimize the commuting distances between residential concentrations and employment centers by encouraging the development of mixed land uses in appropriate areas.</i></p>	<p><u>Consistent.</u> High, Medium, and Medium-High Density areas would orient to internal pathways and common areas with connection to the public walking network and to the urban village. The TCSP Plan includes up to 60,000 gross square feet (gsf) of retail, mixed use, and office uses, and 263,000 gsf of light industrial uses.</p>



2030 General Plan Policy	Discussion
<p><i>CD 5.1. Industrial Clustering. Encourage the clustering of industrial uses into areas that have common needs and are compatible in order to maximize their efficiency.</i></p>	<p><u>Consistent.</u> The nine parcels (11.42 acres combined) to be Annexed south of Teal Club Road are a mix of vacant land and existing small residential and industrial development. Upon Annexation, these parcels would be zoned Light Manufacturing (M-1) by the City of Oxnard and would encourage the clustering of industrial uses in that area and adjacent to the airport.</p>
<p><i>CD 5.3. Available Services. Encourage industrial activities to locate where municipal services are available including adequate storm drainage and water facilities, as well as easy access to multiple modes of transportation.</i></p>	<p><u>Consistent.</u> The nine parcels (11.42 acres combined) to be Annexed south of Teal Club Road are a mix of vacant land and existing small residential and industrial development. Municipal services currently exist in this area. As projects that are proposed within the nine parcels and in the TCSP area come forward for review and approval, they would be required to comply with this policy and with existing national, state and local regulations for storm water management.</p>
<p><i>CD 5.5. "Green" Major Transportation Routes. Guide industrial development to locate near transportation facilities capable of handling goods movements in an efficient manner without decreasing the level of service on the transportation network or dividing existing neighborhoods.</i></p>	<p><u>Consistent.</u> Industrial development would be located in the vicinity of major transportation routes and would not divide an existing neighborhood. The nine parcels proposed for Annexation, which could be developed with industrial uses, are located adjacent to the Oxnard Airport and no existing neighborhood is located on either side of the parcels. Development would occur within 2.5 miles of Highway 101, a major transportation route, which is accessible via arterials such as 5th Street and Victoria Avenue.</p>
<p><i>CD-7.1 Establishment of Urban Villages. Six areas of the City are initially designated as Urban Villages. It is the intent of the Urban Village designation that specific or strategic plans for each area will be prepared in advance of the planning entitlement process. Additional Urban Villages and guidelines may be subsequently adopted by the City Council. Urban Villages are envisioned as characterized by:</i></p> <ul style="list-style-type: none"> ● <i>Infill and/or development of formerly agricultural land</i> ● <i>Reinvestment in the existing community</i> ● <i>Mixture of land uses</i> ● <i>Mix of residential densities and housing types</i> ● <i>Providing a minimum of 15 percent affordable housing</i> ● <i>Location along or near corridors, downtown, and transit nodes</i> ● <i>Transit, pedestrian, and bicycle circulation given high priority</i> <p><i>Teal Club Specific Plan:</i></p> <ul style="list-style-type: none"> ● <i>Location. Teal Club Road, Patterson Road, Doris Avenue, and Ventura Road.</i> ● <i>Land Use. Transit oriented residential with supporting mixed use, schools, parks, and neighborhood commercial services.</i> <p><i>Overview. The intent of this urban village is to encourage neotraditional town planning compatible with surrounding uses and the</i></p>	<p><u>Consistent.</u> The proposed TCSP would be consistent with the 2030 General Plan's Urban Village policy (see additional discussion in Section 4.9, <i>Land Use and Planning</i>) and would therefore reduce emissions compared to traditional zoning practices, which do not encourage mixed-use development and alternative transportation modes. The proposed project would also involve pedestrian, bicycle, and transit improvements as discussed in Section 2.0, <i>Project Description</i>, and shown in Figure 2-4.</p>



2030 General Plan Policy	Discussion
<p><i>Oxnard Airport with a focus on sustainability by using green building and planning principles, provision of adequate public and semi-public uses, transit-oriented development, and an identity creating entry component facing Ventura Road. A central focus of this development will be in the provision of balanced community with jobs, school, recreation, shopping, and affordable and market-rate housing.</i></p>	
<p><i>CD-7.5 Pedestrian and Transit Scale. Design urban village areas to be pedestrian-oriented and transit accessible, incorporating block patterns, walking routes and edges, social orientation of buildings, and streetscapes to provide ease of walking and safety.</i></p>	<p><u>Consistent.</u> The urban village would be oriented around a public plaza, and would be within walking distance of residential units and readily accessible to a new bus stop on Ventura Road. One of the project objectives is to create an integrated vehicular, pedestrian and bicycle circulation system that connects residential, industrial, commercial and institutional uses within the project (see Figure 2-4 in Section 2.0, <i>Project Description</i>).</p>
<p><i>CD-7.6 Connectivity. Provide connectivity to other activity nodes in the form of roadways, transit connections, and bicycle and pedestrian linkages that encourages non-vehicular travel modes. Urban villages should be considered major transit transfer points and have amenities oriented towards transit users.</i></p>	<p><u>Consistent.</u> The urban village would be oriented around a public plaza, and would be within walking distance of residential units and readily accessible to a new bus stop on Ventura Road. One of the project objectives is to create an integrated vehicular, pedestrian and bicycle circulation system that connects residential, industrial, commercial and institutional uses within the project (see Figure 2-4 in Section 2.0, <i>Project Description</i>).</p>
<p><i>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.</i></p>	<p><u>Consistent.</u> Mitigation measures have been included throughout this EIR to avoid or mitigate impacts on air quality, traffic, noise, and other environmental resource areas. See Table ES-1 in the Executive Summary for a full list of mitigation.</p>
<p><i>CD 8.9. Jobs/Housing Balance & Sustainable Communities Strategy (SB 375). Incorporate inter- and intra-city jobs/housing balance in the development of the regional and subregional Sustainable Communities Strategy (SB 375), Urban Village strategy and strategic plans, with the main intent to reduce single-occupancy work-related vehicular trips.</i></p>	<p><u>Consistent.</u> The TCSP would create 2,651 employment opportunities and 982 residential units within a transit oriented development community. The adopted VCOG 2040 forecast projects a total of 83,328 jobs and 71,602 households for the City of Oxnard by the year 2040. Therefore, the 2040 jobs/housing ratio would be 1.16:1 which is within the range of 1.1 and 1.34 jobs per housing unit, the acceptable jobs/housing ratio range identified by the VCOG (VCOG, May 2008). With the additional 2,651 jobs and net increase of 988 housing units under the proposed Specific Plan, the jobs/housing would change to 1.18.1 (more skewed towards a greater number of jobs than housing units) but would still be within the acceptable jobs/housing ratio. Therefore, the project would not move the City's ratio out of the VCOG range.</p>
Infrastructure and Community Services	
<p><i>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.</i></p>	<p><u>Consistent.</u> See Section 4.12, <i>Public Services</i> and Section 4.14, <i>Utilities</i> for a thorough discussion of existing and proposed infrastructure.</p>



2030 General Plan Policy	Discussion
Circulation	
<i>ICS 6.1. Transit Facilities for New Developments. Include transit facilities such as bus benches, shelters, pads or turnouts, where appropriate, in new development improvement plans.</i>	<u>Consistent.</u> A new bus stop with a turnout area and passenger amenities such as benches or shelters on Ventura Road is included in the proposed plan.
<i>ICS 7.3. Travel Patterns Promote compact, mixed use development patterns that compliment and encourage TDM programs, pedestrian and bicycle travel, and transit use.</i>	<u>Consistent.</u> A business/research park on the south side of the TCSP area would provide jobs within walking distance of area residents and the urban village would be oriented around a public plaza, and be within walking distance of residential units, as well as readily accessible to a new bus stop on Ventura Road.
<i>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.</i>	<u>Consistent.</u> TCSP buildout is proposed to be “water neutral” so that future water demand does not exceed the proposed transfer of water rights. To provide adequate potable water for the TCSP project, the existing agricultural water rights within the TCSP area would be transferred for municipal and industrial uses to the City of Oxnard. Recycled water would be used, at a minimum, for all landscape irrigation.
<i>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.</i>	<u>Consistent.</u> Recycled water would be used, at a minimum, for all landscape irrigation when it is available. Other conservation techniques would be instituted as feasible.
<i>ICS 11.12. Water for Irrigation. Require the use of non-potable water supplies for irrigation of landscape and agriculture, whenever available.</i>	<u>Consistent.</u> Recycled water would be used, at a minimum, for all landscape irrigation when it is available.
Environmental Resources	
<i>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.</i>	<u>Consistent.</u> All development within the TCSP area and the nine Annexed parcels would be required to adhere to Chapter 22 Section 22-243 of the Oxnard City Code, which requires that the landscape area of projects proposing commercial or industrial uses shall be designed without the use of turf and with 100% water wise plants. The landscape area of single-family residential, multi-family residential, and institutional type of projects shall be designed with no more than 40% of the landscaped area in turf or plants that are not water wise plants. Recycled water would be used discussed in Section 4.14, <i>Utilities and Service Systems</i> .



2030 General Plan Policy	Discussion
<p><i>ER 14.2. Transportation Demand Management (TDM). Employ best traffic management practices such as bus turnouts and traffic signal synchronization in order to reduce traffic-related air emissions impacts; require commercial developers to improve public transit service between residential and employment uses or shopping centers, bike lanes and protected bicycle parking areas, and other project features that would reduce the need for automobile trips related to the development; and require Transportation Management Associations (TMA) for projects that may have adverse air quality impacts related to mobile sources and contributions to off-site TDM funds to reduce residual impacts that cannot be mitigated on a project-specific basis.</i></p>	<p><u>Consistent.</u> See Section 4.3, <i>Air Quality</i> for Mitigation Measure AQ-2(a) which requires the creation of a TDM program, as well as Section 4.13, <i>Transportation and Traffic</i>, which includes mitigation measures related to reducing congestion and, therefore, emissions, at intersections.</p>
<p><i>ER 14.3. Reducing Carbon Monoxide Exposure at Congested Intersections. Require mitigation measures that consider prohibiting the construction of residences or buildings lacking ventilation systems at congested intersections with the potential for excessive Carbon Monoxide "hot spot" exposure to sensitive receptors.</i></p>	<p><u>Consistent.</u> See Section 4.3, <i>Air Quality</i> for discussion of Carbon Monoxide "hot spot" risks. CO impacts would be less than significant.</p>

City of Oxnard Energy Action Plan (EAP). The City of Oxnard EAP, adopted in April 2013, is the City's guiding document for reducing energy consumption and reducing renewable energy production within City Government and the community relative to planned growth by 2030. The purpose of the document is to establish a net energy consumption reduction target and to identify and scope programs to achieve the target over time. It builds upon existing energy conservation efforts and identifies energy conservation and production programs consistent with 2030 General Plan goals and policies, utility company programs, and State and Federal legislation and initiatives. The project would be consistent with Program C-5: Recycled Water Outreach and Education Program, which focuses on the use of recycled water, with the Advanced Water Purification System. Additionally, the project would be designed to meet Title 24 California Building Code energy efficiency standards. Project emissions would not exceed the GHG emission efficiency threshold of 3.2 MT/year CO₂E per SP and, as described in Section 4.3, *Air Quality*, the project would be consistent with the overall EAP goal of efficient energy use.

The TCSP and buildout of the additional Annexation parcels with industrial land uses would be consistent with the goals in AB 32, SB 375, E-55-18, the SCAG RTP/SCS, the 2017 Climate Change Scoping Plan, City of Oxnard 2030 General Plan, and the City of Oxnard EAP. Therefore, the TCSP would not conflict with any plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts associated with GHG emissions would be less than significant.

Mitigation Measures. As specified above, the proposed project would be potentially consistent with the SCAG 2040 RTP/SCS, the State Scoping Plan, the City's 2030 General Plan, and the City's Energy Action Plan. With mitigation measures identified in Section 4.3, *Air*



Quality, and Section 4.13, *Traffic and Transportation*, would be consistent with applicable plans, policies, and regulations. No additional mitigation is required.

Significance after Mitigation. Impacts would be less than significant without additional mitigation beyond measures described in Section 4.3, *Air Quality*, and Section 4.13, *Traffic and Transportation*.

c. Cumulative Impacts. Growth in Oxnard would result in increased GHG emissions from vehicle trips, energy consumption, and other sources. Analyses of GHGs are cumulative in nature because project-level GHG emissions contribute to the cumulative impact of the accumulation of GHGs in the atmosphere. Projects falling below the impact thresholds discussed above would have a less than significant impact, both individually and cumulatively. As indicated above, GHG emissions associated with the proposed TCSP would be less than significant. As discussed in Impact GHG-2, the TCSP would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Because emissions associated with the proposed TCSP would not exceed quantitative thresholds and proposed development would comply with and implement applicable plans and policies pertaining to GHG reduction, the TCSP's contribution to significant cumulative impacts related to GHG emissions is not cumulatively considerable.



4.7 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates potential impacts relating to hazardous materials in the soil and groundwater on and around the project area, and potential impacts associated with the nearby airport. Geologic hazards are discussed in Section 4.5, *Geology and Soils*, of this EIR. This section is partially based on a Phase I Environmental Site Assessment conducted by California Environmental Geologists & Engineers, Inc., in July of 2007 (Appendix E) and an airport hazard assessment conducted by Heliplanners, Inc., in August of 2012 (Appendix F). As of the writing of this EIR, both documents remain valid, however, as appropriate information has been updated to reflect current conditions. In addition, the project was reviewed by Ventura County Transportation Commission and Ventura County Department of Airports; comments from these agencies are included in letters regarding the Draft EIR that was circulated in 2015.

4.7.1 Setting

a. Hazardous Materials Regulatory Setting. Federal, state, and/or local government laws define hazardous materials as substances that are toxic, flammable/ignitable, reactive, or corrosive. Extremely hazardous materials are substances that show high or chronic toxicity, carcinogenic, bioaccumulative properties, persistence in the environment, or that are water reactive. Hazardous materials impacts are normally a result of project related activities disturbing or otherwise encountering such materials in subsurface soils or groundwater during grading or dewatering. Other means for human contact with hazardous materials are transportation accidents associated with the transportation of hazardous materials along highways and railroads.

Hazardous Materials. At the federal level, primary responsibility for enforcing the laws and regulations that govern the use, storage, and disposal of hazardous materials and hazardous waste falls to the US Environmental Protection Agency (USEPA). The Resource Conservation and Recovery Act of 1976 (RCRA) defines when a hazardous substance is a hazardous waste based on a number of criteria, and regulates hazardous wastes from “cradle to grave,” that is, from generation of the waste through disposal. Title 49 of the Code of Federal Regulations (CFR 49) contains lists of more than 2,400 hazardous materials and regulates the transport of hazardous materials. The Occupational Health and Safety Administration (OSHA) published standard 1910.120, addresses dangers that hazardous materials pose in the workplace. The standard requires that employers evaluate the potential health hazard that hazardous materials pose in the workplace and communicate information concerning hazards and appropriate protective measures to employees. Under OSHA standard 1910.120, a health hazard is defined to mean “a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees.” The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, also known as Superfund, was established to hold multiple parties, including past and present owners, operators, transporters, and generators jointly, severally, and strictly liable for the remediation costs of a contaminated site.

At the state level, under Title 22, Division 4.5 of the California Code of Regulations (CCR 22), the California Department of Toxic Substance Control (DTSC) regulates hazardous waste in



California primarily under the authority of the federal Resource Conservation and Recovery Act of 1976, and the California Health and Safety Code. The DTSC is responsible for permitting, inspection, compliance, and corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. The DTSC defines hazardous waste as waste substances which can pose a substantial or potential hazard to human health or the environment when improperly managed. Hazardous waste possesses at least one of these four characteristics: ignitability, corrosivity, reactivity or toxicity; or it appears on special USEPA lists.

The State of California Water Resources Control Board (SWRCB) also regulates the handling, storage, and disposal of hazardous substances in construction projects. Permits and/or other action by the SWRCB may be required if contamination of water or soils occurs during buildout of the proposed TCSP or construction facilitated by the additional parcels proposed for Annexation.

CalEPA is directly responsible for administering the “Unified Program,” which consolidates and coordinates the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs. The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs and is implemented at the local government level by Certified Unified Program Agencies (CUPA). A local CUPA is responsible for administering/overseeing compliance with the following programs, as required by state and federal regulations:

- *Hazardous Materials Release Response Plans and Inventories (Business Plans)*
- *California Accidental Release Prevention (CalARP) Program*
- *Underground Storage Tank Program (UST)*
- *Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control and Countermeasure (SPCC) Plans (AST)*
- *Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs*
- *California Uniform Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements*

In Oxnard the local CUPA is the City of Oxnard Fire Department.

Soil Contamination Health Risk Assessment. Regulatory agencies such as the USEPA, DTSC, and California Office of Environmental Health Hazard Assessment (OEHHA) set forth guidelines that list concentration thresholds over which contaminants pose a risk to human health. The USEPA combines current toxicity values of contaminants with exposure factors to estimate what the maximum concentration of a contaminant can be in environmental media before it is a risk to human health. These concentrations set forth by the USEPA are termed Preliminary Remediation Goals (PRGs) for various pollutants in soil, air, and tap water (USEPA Region IX, Preliminary Remediation Goals Tables, 2002). PRG concentrations can be used to screen pollutants in environmental media, trigger further investigation, and provide an initial cleanup goal. PRGs for soil contamination have been developed for both industrial and residential land uses. Residential PRGs are more conservative and take into account the possibility of the contaminated environmental media coming into contact with sensitive



receptor sites such as nurseries and schools. PRGs consider exposure to pollutants by means of ingestion, dermal contact, and inhalation, but do not consider impacts to groundwater.

Soil Contamination Groundwater Protection. The Los Angeles Regional Water Quality Control Board (RWQCB) has developed an interim guidance document that contains numerical site screening levels to determine the need for remediation of gasoline and volatile organic compound (VOC) contaminated soils (Los Angeles RWQCB, 1996). The guidance document has been used to determine when a site may require remedial action or to establish an acceptable clean up standard for a particular constituent. The document was developed to simplify the remediation process by facilitating the selection of soil cleanup levels for gasoline and VOC impacted sites.

Groundwater Contamination. Both the USEPA and the California Department of Health Services (DHS) regulate the concentration of various chemicals in drinking water. DHS thresholds are generally stricter than USEPA thresholds. Primary maximum contaminant levels (MCLs) are established for a number of chemical and radioactive contaminants (Title 22, Division 4, Chapter 15, California Code of Regulations). MCLs are often used by regulatory agencies to determine cleanup standards when groundwater is affected with contaminants.

Asbestos. Asbestos is a highly crumbly material often found in older buildings (pre-1979), typically used as insulation in walls or ceilings. It was popular as an insulating material; however, it can pose a health risk when very small particles become airborne. In conformance with the Clean Air Act, the EPA established the National Emissions Standards for Hazardous Air Pollutants (NESHAP) to protect the public. The asbestos regulations under NESHAP control work practices during the demolition and renovation of institutional, commercial or industrial structures. Following identification of friable asbestos, the Federal OSHA and VCAPCD require that asbestos trained and certified abatement personnel perform asbestos abatement and all asbestos containing material (ACM) removed from structures shall be hauled to a licensed receiving facility and disposed of under proper manifest by a transportation company certified to handle asbestos. Disposal of any ACM is also regulated by the County Fire Department and specific requirements are determined during the permitting process.

Lead-Based Paint. Prior to the enactment of federal regulations limiting their use in the late 1970s, lead-based paint (LBP) was often used in residential construction. Lead is a highly toxic metal that was used for many years in products found in and around homes. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. The primary source of lead exposure in residences is deteriorating LBP. Lead dust can form when LBP is dry scraped, dry sanded or heated. Dust also forms when painted surfaces bump or rub together. Lead-based paint that is in good condition is usually not a hazard. Regulations for LBP are contained in the Lead-Based Paint Elimination Final Rule 24 CFR 33, governed by the U.S. Housing and Urban Development (HUD) requires sellers and lessors to disclose known lead-based paint and lead-based paint hazards to perspective purchasers and lessees. Additionally, all lead-based paint abatement activities must be in compliance with California and Federal OSHA and with the State of California Department of Health Services requirements. Only lead-based paint trained and certified abatement personnel are allowed to perform abatement activities. All lead-based paint removed from structures must



be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

Pesticide Use Regulations. The CalEPA's Department of Pesticide Regulations establishes regulations regarding agricultural chemical use. These regulations are designed to prevent pesticides from being used in such a way as to jeopardize or cause injury to others. Since their approval in 1970, the Ventura County Agricultural Commissioner's office enforces these regulations through site visits and the permitting process. Among these regulations is Section 6614 from Title 3 of the California Code of Regulations, which is included in part as follows:

- (b) *Notwithstanding that substantial drift will be prevented, no pesticide application shall be made or continued when:*
 - (1) *There is a reasonable possibility of contamination of the bodies or clothing of persons not involved in the application process;*
 - (2) *There is a reasonable possibility of damage to non-target crops, animals, or other public or private property;*
 - (3) *There is a reasonable possibility of contamination of non-target public or private property, including the creation of a health hazard, preventing normal use of such property.*

b. Project Area Hazardous Materials Setting. The following discussion is based on an Environmental Site Assessment (ESA), Phase I Update prepared by California Environmental, Inc. in 2007 (Appendix E) and other documents. The Phase I ESA included research of available land use records and other sources for indications of hazardous material impacts to the soil and groundwater beneath the TCSP area. The Phase I ESA included the land bounded by Doris Avenue to the north, Ventura Road to the east, Teal Club Road to the south, and Patterson Road to the west. In addition, an updated record search of the DTSC EnviroStor and SWRCB GeoTracker databases was performed in August 2019. No new listings indicating releases of hazardous materials were present on the TCSP area or additional Annexation area.

Historical Land Use. Historical aerial photographs indicate the TCSP area has been historically used for agriculture. Much of the land surrounding the TCSP area has transitioned from agriculture to residential development over the last 30 years. Gasoline service stations were historically present east of the TCSP area on the northeast and southeast corners of Ventura Road and Doris Avenue.

Information about the historical use of the additional Annexation area south of Teal Club Road was not discussed in the Phase I ESA for the TCSP area. However, this area, like the TCSP area, is presumed to have been historically used for agriculture and to have transitioned from agriculture to residential and industrial development over the last 30 years.

Existing Structures. The TCSP area is in active agricultural use, currently cultivated with row crops. There are several agricultural accessory buildings in the TCSP area, the largest being a barn and greenhouses in the central-southern portion along Teal Club Road. The TCSP area also supports two single family residences, one just east of the barn and one in the northeastern corner of the project area at Doris Avenue and North Ventura Road. Some of the agricultural accessory buildings are well over 50 years old. The single family residence in the central-



southern portion of the project area along Teal Club Road was constructed in the early to mid-1960s and the other single family residence in the northeastern corner was constructed in the early 1920s. Due to the age of the existing structures, lead and asbestos-containing materials may be present.

The additional Annexation area south of Teal Club Road is currently a mix of vacant land and approximately six small residences and industrial development.

Soils and Groundwater. Agricultural activity has been ongoing in the TCSP area itself for at least 60 years. Farming activity has included sugar beets, citrus and row crops such as lettuce. Agricultural pesticides associated with crop production have been used on the TCSP area. The Phase I ESA found residual levels of chlorinated pesticides in the soil. The residual levels were typically restricted to the upper 1 foot to 1.5 feet below ground surface (bgs). The most common pesticide found in soil beneath the property was toxaphene. Concentrations of toxaphene were found to exceed Preliminary Remediation Goals (PRGs) for residential soils. Concentrations of chlordane, DDT, DDE, DDD were also found to exceed Total Threshold Limit Concentrations (TTLC) for the toxicity characteristic of hazardous waste in soil. Toxaphene levels exceeded the PRG at depths of at least one foot bgs and generally decreased to non-detect by 2.5 feet bgs. DDT, DDE, and DDD were less uniformly distributed and were detected at combined concentrations that exceed the TTLC at only one sampling location. DDT, DDE, and DDD were not detected above their respective PRG. The concentrations generally decreased to non-detect by 2.5 feet below the ground surface. Arsenic was also found above the PRG to be uniformly distributed within the upper one foot bgs.

Hazardous Materials. No evidence of the past or current use, treatment, storage, disposal or generation of hazardous substances, other than fuels, was observed in the TCSP area. (Note: the additional Annexation area was not surveyed as part of the 2007 Phase I ESA for the TCSP area, but the results of a database search for the additional Annexation area are discussed below in this subsection.) An aboveground diesel fuel storage tank (approximately 5,000 gallons) is present in the maintenance area at the northeast corner of the TCSP area. This facility appears to be an unpermitted, unregulated fuel tank without the required spill containment and overfill protection. Minor diesel soil contamination was recognized in the area of the aboveground tank. No other evidence of existing underground storage tanks, clarifiers, sumps, or grease interceptors was observed during the project area reconnaissance.

Various pole mounted and pad mounted electrical transformers are present adjacent to or on the TCSP area. No evidence of leakage or spillage of hydraulic oils was found. The transformers are maintained and serviced by Southern California Edison.

As part of the Phase I ESA, Environmental Data Resources, Inc. (EDR) was contracted to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred. The search found that one property within the TCSP area and no properties within the additional Annexation area were listed on a hazardous materials database. The property at 1618 Doris Avenue within the TCSP area is listed as a facility that generated and stored hazardous materials on the Underground Storage Tank (UST) database and the Historic UST Registered Database. The property at 1618 Doris Avenue was also identified as a site that had a reportable release of fuel



on the on the CORTESE list and Leaking Underground Storage Tank (LUST) database. The leaking underground fuel storage tanks and surrounding soil at 1618 Doris Avenue were excavated and removed in 1987. Five groundwater monitor wells were installed around the area of the gasoline fuel hydrocarbon release. The wells were monitored intermittently from 1989 through 1995. A request for closure was made to the County of Ventura and the County required one more round of groundwater sampling which occurred in 1997. The 1997 groundwater sampling showed non-detect levels of gasoline fuel hydrocarbons in all wells. Based on this finding, the County of Ventura issued final case closure for the property on February 9, 1998. The Phase I ESA found toxaphene, along with DDT and its breakdown products to depths of up to 10 feet in the area of the underground storage tank removal and remediation work. It is suspected that the residual pesticide contamination found at depth in this location is related to backfilling of the underground storage tank excavation with project area soil.

Two hazardous materials sites are located just outside the additional Annexation area south of Teal Club Road. The Proodos Properties, Inc. site, located at 2200 Teal Club Road just west of the additional Annexation area, was identified as a site that had a reportable release of fuel on the CORTEST list and LUST database. However, RWQCB issued case closure in March 1996. In addition, a LUST was reported at the Ven Oaks Plumbing site in 1987, which is located at 131 Mallard Way just east of the additional Annexation area. Remediation of this LUST occurred in 1989 and the RWQCB issued case closure in May 2006.

Another LUST site is located at the closed Mobil Oil Service Station located at 600 Ventura Road, approximately 0.23 miles northeast of the project area. Mobil Oil had a release of gasoline in September 1988. Impacted soil was excavated and disposed offsite. The RWQCB issued case closure in September 2001.

The updated August 2019 database search found one EnviroStor site at the location of a potential Oxnard School District educational facilities site adjacent to the project area. The site is restricted to non-residential uses through a land use covenant, and has been certified since September 2018.

b. Airport Setting. Oxnard Airport was opened in 1934 and is located in the central portion of Oxnard. Oxnard Airport is owned and operated by the County of Ventura. The airport is bounded by the additional Annexation area and other residences and light industrial uses to the north, Victoria Avenue on the west, Ventura Road on the east, and West Fifth Street on the south. The airport encompasses a total of 216 acres and consists of a single east-west asphalt runway that is 5,953 feet long by 100 feet wide. Also, the airport area includes 56,100 square feet of hangar space and a 10,000 square foot passenger terminal. The TCSP area is approximately 750 to 2,800 feet north of the runway. The additional Annexation area is approximately to 720 feet north of the runway.

The proximity of Oxnard Airport to populated areas of the City presents some inherent land use conflicts that are addressed by both City and County planning programs and Federal regulations.



Federal Regulations. The Federal Aviation Administration (FAA) controls air traffic in the vicinity of certain “controlled airports.” Oxnard is a controlled airport and has FAA-staff Air Traffic Controllers providing control over aircraft from 7:00 am to 9:00 pm. The FAA publishes various “advisory circulars” that address airport planning and design issues. In general, compliance with these circulars is required for airports that accept federal funding under the Airport Improvement Program. Oxnard Airport has been the recipient of federal grants for planning and construction projects.

The FAA also reviews projects proposed on or near airports for compliance with airspace obstruction-clearance criteria published in 14 CFR, Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace*, of the Federal Aviation Regulations (FARs). FAR Part 77 requires that a project be submitted to the FAA for review if it would penetrate a “notice surface” based on a slope of 100 feet horizontal to 1 foot vertical from the nearest point of the nearest runway. The notice surface simply establishes a threshold for FAA study; it does not suggest that an object that might penetrate it would be an obstruction. The application initiates an “obstruction evaluation” (OE) by FAA staff. The FAA's role in conducting an OE is solely to determine if a proposed structure might constitute an obstruction or, more seriously, a “hazard” to air navigation. Regardless of its findings, FAA cannot approve or prohibit construction; that responsibility is with the local jurisdiction in exercising its zoning powers.

The most distant structure from the airport runway in the TCSP area would be approximately 2,800 feet away. At this distance, a structure over 28 feet would penetrate the “notice surface.” Because the nearest structures within the TCSP area would be only about 250 feet from the runway edge, virtually all of them could penetrate the notice surface. In addition, as the additional Annexation area is within 250-720 feet from the runway, all buildings within the additional Annexation area would penetrate the notice surface. Therefore, Part 77 does require that the developer submit the project to FAA for study. This can be done as a blanket application for the entire development rather than as individual applications for each building.

State Regulations. Caltrans’ Division of Aeronautics (DOA) is charged with granting permits for construction of airports and heliports in California. DOA ensures that facilities meet state design standards prior to licensing and continues to meet them during annual inspections. Oxnard Airport holds an Airport Permit issued by DOA. Caltrans DOA also publishes the California Airport Land Use Planning Handbook (the Handbook), which establishes statewide guidelines for airport land use compatible planning based on the State Aeronautics Act.

State law requires that counties with one or more airports are generally required to establish a county airport land use commission. Each commission is required to formulate and approve an airport land use compatibility plan that provides for the orderly growth of each public airport and the area surrounding the airport that is within the commission’s jurisdiction.

In Ventura County, the Ventura County Airport Land Use Commission (the “Commission”) was created in response to the requirements of state law. In 1991, the Commission approved the plan that is now known as the Ventura County Comprehensive Airport Land Use Plan (the “Plan”). As part of the Plan, the Commission adopted specific zones around the airports in Ventura County, including the Oxnard Airport. The zones include the Runway Protection Zone,



the Outer Safety Zone and the Traffic Pattern Zone. The Plan includes use specific restrictions for each of the zones.

State law outlines a specific process that is to be followed to obtain an official determination from the Commission. Specifically, state law requires that specific types of legislative acts and regulations within areas covered by the Plan must be submitted to the Commission for a determination of whether the development is consistent with the Plan. If the Commission determines that the proposed action is inconsistent with the Plan, then the City has the option of overruling the Commission. That, however, can only occur if at least 2/3rds of the City Council (i.e., five members) vote to make specific findings that the proposed action is consistent with specific provisions of state law regarding the orderly development of airports, including preventing the creation of new noise and safety problems.

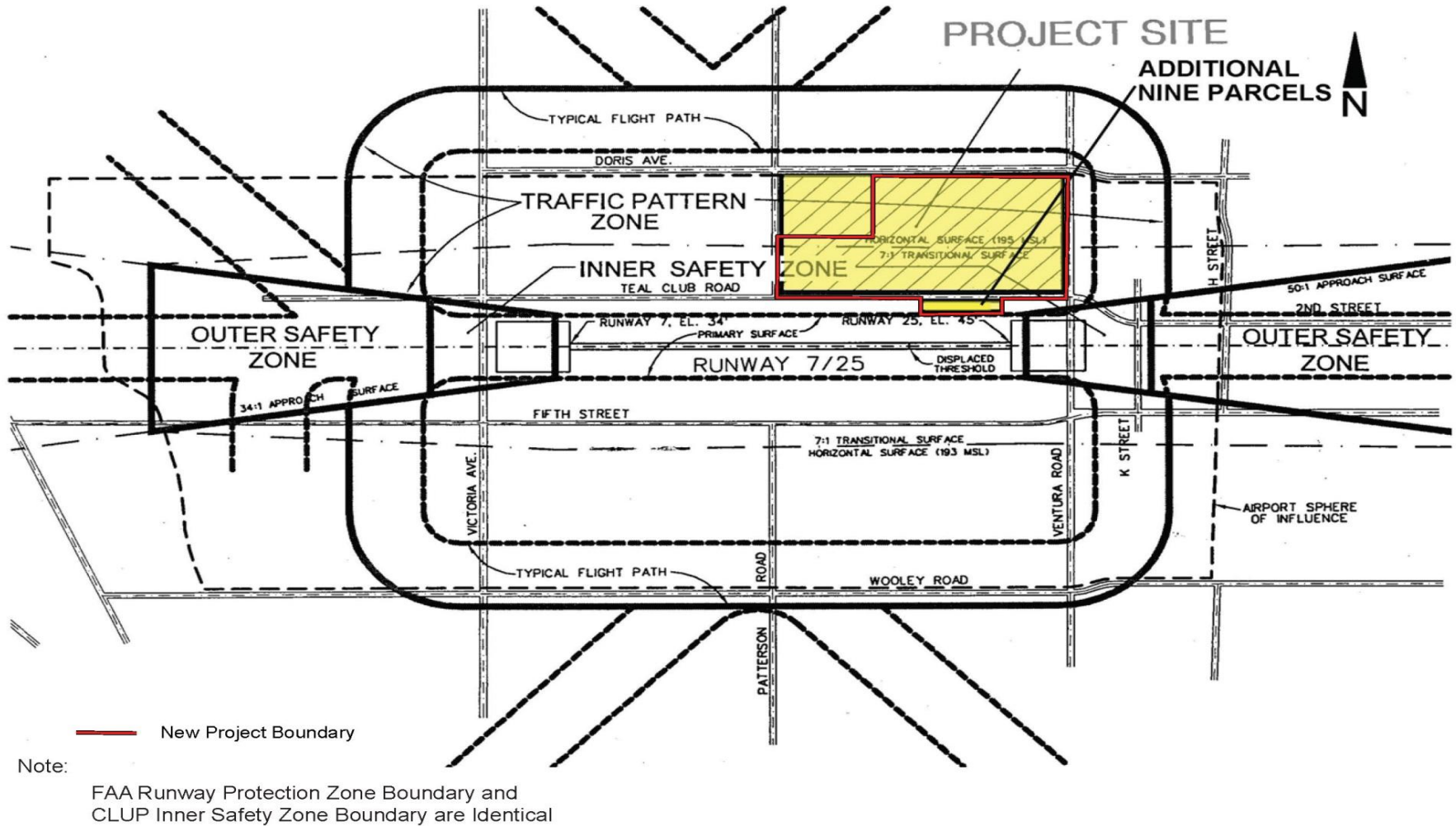
At least 45 days prior to the City Council's decision to consider whether to override the decision of the Commission, the City Council must provide the Commission and Caltrans' Division of Aeronautics with the proposed decision and findings. The Commission and Division of Aeronautics may provide comments to the City Council within 30 days of receiving the proposed decision and findings. The City Council is to include comments from the Commission and the Division of Aeronautics in the final record of any final decision to overrule the airport land use commission.

County of Ventura Planning Programs. In order to minimize conflicts between airports and surrounding uses, each county in California is required to have an Airport Land Use Commission (ALUC). The purpose of the ALUC is to work towards ensuring compatible land use surrounding airports with respect to noise and safety. The Ventura County Transportation Commission (VCTC) acts as the ALUC for Ventura County, and is charged with reviewing land use proposals within certain planning boundaries. Those boundaries are defined in the Airport Comprehensive Land Use Plan for Ventura County (CLUP), adopted in 1991 and updated in 2000. The project area is within the airport planning boundaries defined in the CLUP. The CLUP is intended to protect and promote public safety and governs all aviation facilities in the County. The CLUP establishes planning boundaries, use restrictions, and development standards based on the State Aeronautics Program 1993 Airport Land Use Planning Handbook, and the California Public Utilities Code. The CLUP has established three general areas of concern with regard to land use planning around the county airports. These include building height restrictions, air traffic safety, and aircraft noise. The airport noise impacts are discussed in this EIR in Section 4.10, *Noise*.

Safety Zones. The CLUP defined three "air safety zones" surrounding the airport that are designed to provide a method of assessing the compatibility of various types of land uses with respect to aircraft operations. The three zones are the "inner safety zone," the "outer safety zone," and the "traffic pattern zone." The project area is inside the traffic pattern zone. Figure 4.7-1 illustrates the current airport safety zones and where these zones are relative to the project area.



Figure 4.7-1 Air Safety Zones



Source: Heliplanners



Height Restricted Zone. Height limitations in the CLUP are based on the guidelines in the Federal Aviation Regulations (FAR) Title 14 Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace. These standards are used by the FAA in determining whether objects may obstruct safe air navigation. Part 77 defines a variety of “imaginary surfaces” at specific altitudes and specific distances from the runway that are utilized by the FAA as a preemptive measure to identify potential flight hazards prior to their construction. The “horizontal surface” is established at 150 feet above the official airport elevation level. The “transitional surfaces” extend up and out from the primary approach surface edges and rise at a 7:1 slope (seven feet horizontal to one foot vertical) until reaching the horizontal surface at 195 above mean sea level (MSL). Any penetrations of these surfaces are subject to review by the FAA. If a safety problem is found, the FAA issues a determination of a hazard to air navigation. The FAA cannot prevent development; rather, it is up to the local authorities to implement FAA recommendations. The TCSP area underlies both the northern transitional surface and the horizontal surface. The Oxnard Airport is at 45 feet above MSL; therefore, the horizontal surface for purposes of planning is 195 MSL. The transitional surface in the southern part of the TCSP area near Teal Club Road is approximately 95 feet above MSL. The transitional surface in the southern part of the additional Annexation area is approximately 45 feet above MSL as the southern part of the Annexation area is contiguous with the airport property line.

City of Oxnard Planning Programs. The Oxnard 2030 General Plan defines an Airport Sphere of Influence that includes the TCSP area. Oxnard Zoning Ordinance 2132, Part 6, Section 36-5.13.0 (Airport Hazard Overlay Zone) subjects projects proposed within the Sphere of Influence to an assessment of potential risk from aviation activities. Proposed new development projects within the Airport Sphere of Influence are referred to the Oxnard Airport Authority for review and approval. Proposed changes to Oxnard’s General Plan, zoning, or development regulations that may affect property in the Airport Sphere of Influence are referred to the Ventura County Land Use Commission.

Before filing an application for any project within the “sphere of influence”, the developer is required to submit the project to the Federal Aviation Administration (“FAA”) for review and report to determine compliance with adopted approach and departure slopes, and clear zones established for the Oxnard Airport.

As part of this process, the applicant is responsible for the preparation of an aircraft hazard and land use risk assessment concerning the proposed use as part of the process.

The aircraft hazard and land use risk assessment is required to address a range of issue, including:

- (a) Relationship of the project to adopted FAA glide slopes and clear zones;
- (b) Relationship of the project to adopted aircraft approach, departure, and traffic patterns;
- (c) A report of all aircraft accidents within the traffic area of the Oxnard tower within the past six months;
- (d) A report on the number of operations at Oxnard Airport and violations (if available) under the authority of the Oxnard Airport control tower for the preceding 6- to 18-month period; and
- (e) An assessment of the level of risk posed to persons involved in the proposed land use by the potential forced landing or crash of an aircraft on the developed site.



A project within the sphere of influence is also required to be submitted to the Oxnard Airport Authority for review and recommendation before the project is considered by the Planning Commission. The staff report and minutes of the Oxnard Airport Authority's review are to be furnished to the Planning Commission as part of the approval process

4.7.2 Impact Analysis

a. Methodology and Significance Thresholds. The methodology used in this assessment includes review of previous environmental reports for the project area and other readily available information to assess the potential presence of hazards and contamination sources within the project area. For the purpose of this analysis, in accordance with the City of Oxnard's 2017 CEQA Guidelines, a significant effect would occur if the proposed project would:

1. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials that cannot be addressed through compliance with standard regulatory requirements*
2. *Create a substantial hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment*
3. *Emit hazardous substances or involve handling of hazardous or acutely hazardous substances or waste within ¼ mile of an existing or proposed school in quantities or a manner that would create a substantial hazard*
4. *Be located on a site which is included on a list of hazardous material 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*
5. *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan*

The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.7-1 lists the thresholds under consideration in the hazards and hazardous materials analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).



**Table 4.7-1
 Summary of Hazards and Hazardous Materials Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials that cannot be addressed through compliance with standard regulatory requirements?			X	
2. Create a substantial hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		
3. Emit hazardous substances or involve handling of hazardous or acutely hazardous substances or waste within ¼ mile of an existing or proposed school in quantities or a manner that would create a substantial hazard?			X	
4. Be located on a site which is included on a list of hazardous material 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?			X	
5. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	

Impact HAZ-1 Buildout of the TCSP area and additional Annexation area would include development of residential, commercial, and light industrial land uses that could involve the use, storage, disposal or transportation of hazardous materials. However, required adherence to existing regulations would help to ensure that this is a Class III, less than significant impact.

The proposed TCSP and additional Annexation area could facilitate the construction of residential, commercial, and light industrial land uses that could involve the use, storage, disposal or transportation of hazardous materials. The potential residential and most of the potential commercial uses do not generally involve the use, storage, disposal, or transportation of significant quantities of hazardous materials. They may involve use and storage of some materials that are considered hazardous, though these materials would be primarily limited to solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies. These materials would not be substantially different from household chemicals and solvents already in general and wide use throughout the City.

The additional Annexation parcels would be zoned M-1 for light manufacturing uses. Permitted uses in the M-1 zone include manufacturing facilities, machine shops, assembly and production facilities, warehouses, automobile, aircraft or boat assembly or repair, and research and development operations, among others. All uses, with the exception of parking, must be conducted within an enclosed building unless otherwise approved by a special use permit. Pursuant to Section 16-168, "Obnoxious industrial uses, which adversely affect the environment or which exhibit an unusual degree of hazard" are expressly prohibited in the M-1 Zone. As



with any manufacturing or industrial operation, project area activity involving hazardous substances, and the transport, storage, handling, and retail sale of household hazardous materials (e.g., pesticides, fertilizer, paint solvents, and cleaning products), must adhere to applicable local, state, and federal safety standards, ordinances, or regulations. Businesses engaged in the use, sale, storage, or transport of hazardous substances are monitored by various local (e.g., Oxnard Fire Department and City of Oxnard) and State (e.g., Department of Toxic Substance Control) entities. Potential future manufacturing uses would be required to store hazardous materials in designated areas designed to prevent accidental release into the environment.

Development in the City must be in compliance with the following environmental and emergency programs: Aboveground Storage Tank Program, Business Emergency Plan/Handler Program, California Accidental Release Prevention Program, Certified Unified Program Agency (CUPA) program, Environmental Clean-Up Oversight, Hazardous Waste Generator Program, and Underground Storage Tank Program. It should be noted that, in 1994, SB 1082 was enacted to consolidate the six hazardous materials related programs (Business Emergency Plan/Hazardous Materials Handler, Hazardous Waste Generators, Underground Storage Tanks, California Accidental Release Prevention Plans, Aboveground Storage Tanks and Uniform Fire Code Hazardous Materials Management Plans). The result of this effort evolved into what is now called the CUPA program. The City of Oxnard Fire Department is the local agency charged with implementing these programs and provides permitting, inspections, and enforcement associated with these required regulations within the City of Oxnard.

Although proposed light industrial uses in the additional Annexation area would involve the use, storage, and transport of hazardous materials, adherence to the required environmental and emergency programs mentioned above would ensure that these uses would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The proposed project would not create a significant hazard to the public or environment involving hazardous materials. Therefore, impacts would be less than significant.

Mitigation Measures. No mitigation measures are necessary beyond adherence to applicable laws and regulations.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact HAZ-2 Development of the TCSP and additional parcels to be Annexed would require the demolition of structures that could contain asbestos or lead based paints. Demolition of these buildings, if these materials are present, could potentially expose workers to hazards that would adversely affect human health and safety. Also, buried asbestos-cement (“transite”) water pipes contain asbestos. However, compliance with both locally adopted Ventura County Air Pollution Control District (VCAPCD) and State regulations regarding the handling and disposal of these materials would reduce these potential impacts to Class II, *significant but mitigable*.



As indicated in the *Setting*, the proposed project would involve the demolition of two single family residences, one just east of the barn and one in the northeastern corner of the project area at Doris Avenue and North Ventura Road. These residences are over 50 years old. In addition, some of the agricultural accessory buildings that would be demolished as part of the proposed project are well over 50 years old. Construction of the project would involve demolition of the existing buildings, which, due to their age, may contain asbestos and/or lead-based paint. Demolition of these structures could result in health hazard impacts to workers if not remediated prior to construction activities. There are also buried asbestos-cement (or transite) water pipes in the TCSP area which contain asbestos and may be encountered during grading (California Environmental, 2007). Therefore, impacts would be potentially significant.

Mitigation Measures. The following measures are required to mitigate potential impacts related to the potential release of asbestos or lead during building demolition. These measures would apply to all phases of project construction and are consistent with the Ventura County Air Pollution Control District Rule 62.7 (Asbestos Demolition and Renovation), the California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials, and the California Code of Regulations, §1532.1, which requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards.

HAZ-2(a) Asbestos and Lead Based Paint Surveys. Prior to issuance of a demolition permit for any structure in the project area constructed prior to 1978, a lead-based paint and asbestos survey shall be performed by a qualified and appropriately licensed professional and submitted to the City. All testing procedures shall follow recognized local standards as well as established California and Federal assessment protocols. The lead-based paint and asbestos survey report shall quantify the areas of lead-based paint and asbestos containing materials.

HAZ-2(b) Asbestos Abatement. Prior to any demolition or renovation, project area structures found to contain asbestos must have the asbestos containing material removed according to proper abatement procedures recommended by the asbestos consultant and as required by the VCAPCD. All abatement activities shall be in compliance with California and Federal OSHA, and with the VCAPCD requirements. Only asbestos trained and certified abatement personnel shall be allowed to perform asbestos abatement. All asbestos containing material removed from project area structures shall be hauled and disposed of by a transportation company licensed to handle asbestos-containing materials and disposed of at a licensed receiving facility and under proper manifest. Following completion of the asbestos abatement, the asbestos consultant shall provide a report documenting the abatement procedures used, the volume of asbestos containing material removed, where the material was disposed. This report shall include transportation and disposal



manifests or dump tickets. The abatement report shall be prepared for the property owner or other responsible party, with a copy submitted to the VCAPCD and the City of Oxnard.

- HAZ-2(c) Lead-Based Paint Removal.** Prior to the issuance of a permit for the renovation or demolition of any structure in the project area, a licensed lead-based paint professional shall be contracted to evaluate the structure for lead-based paint. If lead-based paint is discovered, it shall be removed according to proper abatement procedures recommended by the consultant and in accordance with VCAPCD, State of California and Federal requirements. Only lead-based paint trained and certified abatement personnel shall be allowed to perform abatement activities. All lead-based paint removed from these structures shall be hauled and disposed of by a transportation company licensed to transport this type of material. In addition, the material shall be taken to a landfill or receiving facility licensed to accept the waste. Following completion of the lead based paint abatement, the lead based paint consultant shall provide a report documenting the abatement procedures used, the volume of lead based paint removed, where the material was moved to, and include transportation and disposal manifests or dump tickets. The abatement report shall be prepared for the property owner or other responsible party, with a copy submitted to the VCAPCD and the City of Oxnard.

Significance After Mitigation. With implementation of the above mitigation measures, the impacts related to exposure to asbestos containing material and lead based paint would be less than significant because existing asbestos and lead based paint would be properly identified, abated, and removed prior to demolition.

- Impact HAZ-3 The proposed TCSP area is currently used for agriculture. Residual levels of chlorinated pesticides were found in the soil. Chemicals could be released during grading activities for development under the proposed TCSP, exposing construction workers and nearby receptors to contaminated soils. However, with adherence to existing regulations pertaining to the remediation of such soils, impacts would be Class II, significant but mitigable.**

As identified in the *Setting*, the TCSP area is currently used for agricultural production and has been used as such for at least the last 60 years. The Phase I ESA found residual levels of chlorinated pesticides in the soil. The residual levels were typically restricted to the upper 1 foot to 1.5 feet below the ground surface, and generally decreased to non-detect by 2.5 feet below ground surface, except at the site where the leaking underground storage tanks were excavated and removed. Contaminants were found there at depths up to 10 feet. It is suspected that the residual pesticide contamination found at depth in this location is related to backfilling of the underground storage tank excavation with project area soil.



The most common pesticide found in soil beneath the TCSP area is toxaphene. Concentrations of chlordane, DDT, DDE, DDD were also found to exceed Total Threshold Limit Concentrations (TTLC) for the toxicity characteristic of hazardous waste in soil.

Disturbance of soil that may contain materials such as those discussed above has the potential to cause human health hazards, as it would create dust that could transport contaminants through the air affecting project area workers or adjacent receptors through contact or ingestion. This would be a potentially significant impact.

Mitigation Measures. The following measures shall be implemented to mitigate potentially significant adverse health impacts relating to project area soil contamination.

HAZ-3 Remediation. The following recommendations contained in the Phase I ESA shall be implemented during construction of projects in the TCSP area:

- The upper agricultural disturbed soil (approximately upper 1 to 1.5 feet below surface level, to be determined by Building and Engineering Services), shall be removed and the site shall be recompact.
- Monitoring of residual levels of pesticides shall be confirmed both during and following completion of the grading activities to be sure residual levels are below action levels. California Environmental Protection Agency (Cal EPA) California Human Health Screening Levels (CHHSLs) shall be used to set appropriate residual levels for organochlorine pesticide contamination found.
- If residual organochlorine pesticide contamination is found at levels exceeding CHHSLs set by Cal EPA, a Soil Management Plan, Removal Action Plan or equivalent document must be prepared by a qualified hazardous materials consultant. The plan must establish remedial measures and/ or soil management practices to ensure construction worker safety and the health of future workers, residents, and visitors. The Plan shall be submitted to the hazardous materials response team in the Oxnard Fire Department for review and approval.

Significance After Mitigation. Implementation of the above mitigation measures would reduce human health risks associated with possible contamination from herbicides and pesticides to a less than significant level by ensuring that agricultural disturbed soil would be removed and underlying soils would be monitored for the presence of residual levels of pesticides.



Impact HAZ-4 The property at 1618 Doris Avenue in the TCSP area, which is also within ¼-mile of the proposed OSD school site, is listed as a facility that generated and stored hazardous waste materials and is listed on the CORTESE list and the Leaking Underground Storage Tank (LUST) database. However, the LUST has been removed and contaminated soil has been excavated and remediated. Therefore, the impact from the LUST would be Class III, *less than significant*.

As discussed in *Setting*, the property at 1618 Doris Avenue is listed as a facility that generated and stored hazardous materials on the HIST UST and UST lists. The subject property was also identified as a leaking underground storage tank site on the CORTESE and LUST databases where gasoline impacts to soil and groundwater were recognized. This site is located in the TCSP area and within ¼ mile of the OSD site planned for development of two schools. Exposure to hazardous waste materials could affect human health or the environment.

According to Ventura County records, the leaking underground storage tank was removed in 1987 and gasoline fuel hydrocarbons were detected in the soil during removal. The remedial response at the site included excavation and removal of gasoline impacted soil and groundwater monitoring. Five groundwater monitoring wells were installed around the area of the gasoline fuel hydrocarbon release. The wells were monitored intermittently from 1989 through 1995. A request for closure was made to the County of Ventura and the County required one more round of groundwater sampling which occurred in 1997. The 1997 groundwater sampling showed “non-detect” levels of gasoline fuel hydrocarbons in all wells. Based on this finding, the County of Ventura issued final case closure for the property on February 9, 1998. Contamination from the leaking underground storage tank has been remediated and will not create a significant hazard to the public or the environment. Accordingly, risks associated with the former contamination would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. This impact would be less than significant without mitigation.

Impact HAZ-5 The proposed TCSP area and additional annexation area are both within the Oxnard Airport’s traffic pattern zone (TPZ) and are subject to height restrictions. Structures in these areas may be considered obstructions to air travel. Impacts related to airport safety clearance are Class II, *significant but mitigable*.

An aircraft hazard and land use risk assessment was conducted by Heliplanners, Inc. in 2012. This report assessed potential hazards regarding the height of the proposed structures and development within safety zones. The following information is based on the Heliplanners report and the Airport Comprehensive Land Use Plan for Ventura County (CLUP).

The report found that the proposed structures within the TCSP area would likely comply with all relevant criteria, as discussed below, and would not be considered obstructions or hazards to aviation. However, structures on the nine parcels south of Teal Club Road may be considered



obstructions or hazards to aviation. Regardless, because all structures would likely penetrate the FAA “notice surface,” the applicant would be required to initiate an Obstruction Evaluation through the FAA. Mitigation Measure HAZ-6(a) is required.

TCSP Area.

Safety Zones: The TCSP area is within the traffic pattern zone (see Figure 4.7-1). The CLUP contains a list of acceptable, conditionally acceptable, and unacceptable land uses within each safety zone category. The TCSP includes development of single-family residences, multi-family residences, commercial uses, and a park. Parks are listed as acceptable uses in the TPZ. Single-family residences and multi-family residences are listed as conditionally acceptable uses, provided the maximum structural coverage of the land is no greater than 25%. Commercial uses are listed as conditionally acceptable uses, provided the maximum structural coverage does not exceed 50%. Heliplanners estimated that structural coverage in the TCSP area would be less than 20%. Nonetheless, Mitigation Measure HAZ-5(b) is required for development in the TCSP area.

Height Restricted Zone: The TCSP area underlies the horizontal and transitional surfaces for the purposes of airport land use planning. The horizontal surface is at 195 feet MSL and the transitional surface at the southern part of the TCSP area closest to the airport is approximately 95 feet MSL. The tallest proposed building in the TCSP area would be approximately 92 feet MSL. Therefore, no proposed structures would be a significant factor with regard to the horizontal or transitional surfaces. Therefore, the proposed structures in the TCSP area would not be an issue with regards to the height-restricted zone.

Additional Annexation Area.

Safety Zones: The annexation area is within the TPZ. This area is designated for Airport Compatible uses according to the Oxnard 2030 General Plan land use map. The General Plan states that development in land designated for Airport Compatible uses would include low intensity commercial and industrial uses which are compatible with airport operations and activities in that they do not pose unreasonable hazards to aircraft operations. According to the CLUP, industrial and commercial uses in the TPZ are considered conditionally acceptable uses, provided that the maximum structural coverage does not exceed 50%. Therefore, Mitigation Measure HAZ-6(c) is required for development in the additional annexation area.

Height Restricted Zone: The southern edge of the additional annexation area south of Teal Club Road is contiguous with the airport property line. Virtually any structure in this area would violate the 7:1 transitional surface and would constitute an “obstruction” under the criteria published in FAR Part 77. Further, trees, light standards, and power lines may also constitute an “obstruction.” Therefore, the FAA must conduct an obstruction evaluation process for structures in this area to determine if they would be classified as a “hazard” to aviation. (See Mitigation Measure HAZ-6(c).)

The County of Ventura has requested an avigation easement be granted to the County. Typically, an avigation easement indicates that property owner(s) acknowledge that their



properties are in an area subject to frequent aircraft overflights and that such overflights may result in noise, exhaust emissions and vibrations.

For structures in both the TCSP area and the additional annexation area, the ALUC must review the proposed plan for consistency with the CLUP. Assuming review by the ALUC, compliance with County requirements, and adoption of the mitigation measures listed below, impacts would be less than significant.

Mitigation Measure. The following mitigation measures are required to reduce potential impacts related to airport operations:

HAZ-5(a) FAA Notification. For all development in the TCSP area and the additional annexation area, the applicant shall notify the FAA via online application at FAA's <https://oeaaa.faa.gov/oeaaa/external/portal.jsp> website. The FAA will determine if the structure is an "obstruction" or "hazard" to aviation, and if so, will make recommendations to reduce the obstruction or hazard. Prior to issuance of building permits, the applicant shall forward the FAA determination and recommendations to the City of Oxnard and the City shall require that the applicant implement the recommendations provided by the FAA. Recommendations may include the use of red obstruction lighting on new construction.

HAZ-5(b) Structural Coverage in the TCSP Area. Structures within the TCSP area shall conform to the following guidelines:

- Residential uses: Maximum structural coverage of the residential planning areas must be no more than 25%. "Structural coverage" is defined as the percent of building footprint area to total land area, including streets and greenbelts
- Commercial uses: Maximum structural coverage of the commercial planning areas must not exceed 50%. "Structural coverage" is defined as the percent of building footprint area to total land area, including streets and greenbelts.

HAZ-5(c) Structural Coverage in the Additional Annexation Area. Structures within the additional annexation area shall conform to the following guidelines:

- Commercial and industrial uses: Maximum structural coverage must not exceed 50%. "Structural coverage" is defined as the percent of building footprint area to total land area, including streets and greenbelts. Where development is proposed immediately adjacent to the airport property, site plans shall be designed to locate structures as far as practical from the runway.



Significance After Mitigation. With implementation of the mitigation measures above, impacts related to airport operations would be reduced to less than significant levels.

Impact HAZ-6 **Development of the proposed project would place residential, commercial, and manufacturing uses within 2,000 feet of the Oxnard Airport runway, potentially exposing people residing and working in the area to safety hazards. However, the probability of an accident occurring in the project area is low. Further, the presence of nearby emergency landing areas would reduce accident hazards. Therefore, impacts related to airport safety hazards would be Class III, less than significant.**

An aircraft hazard and land use risk assessment was conducted by Heliplanners Inc. in 2012. This report assessed potential safety hazards for residents and workers in the TCSP area and additional Annexation area. The following information is based on the Heliplanners report.

As mentioned in *Setting*, the TCSP area and the additional Annexation area are within the Airport Sphere of Influence defined by the Oxnard 2030 General Plan, an area of approximately 3.6 square miles. During the past 33 years, there have been six significant accidents involving aircraft approaching or departing Oxnard Airport within its Sphere of Influence and two other accidents have occurred near but outside the Sphere of Influence. Therefore, during the past 26 years, there have been eight significant accidents associated with Oxnard Airport, averaging about one every 3.9 years.

The 2012 Heliplanners report calculated the probability of an accident occurring in and adjacent to the TCSP area. In order to calculate this, Heliplanners first examined the probability of an accident occurring somewhere in the Oxnard Airport vicinity. According to figures contained in the 1991 CLUP, a three-year study period from 1986 to 1988 resulted in a national average of 0.36 off-airport accidents per 100,000 operations. At this rate, Oxnard should experience a probability of about 0.31 off-airport accidents per year assuming an activity level of about 86,000 annual operations¹ (or one off-airport accident somewhere in the airport vicinity every 3.23 years).

Second, the report examined the probability of an accident occurring within or adjacent to the TCSP area. The report examined data from 873 aircraft accident records as inventoried by the National Transportation Safety Board. Of the 873 accidents, nine arrival accidents and 17 departure accidents would have occurred within or adjacent to the TCSP area if they had occurred at the Oxnard Airport. This represents 26 (2.98%) of the 873 accidents in the national database. Therefore, the probability of an accident at or near the project site can be seen as 2.98% of the probability of an accident somewhere in the airport vicinity.

Multiplying Oxnard's projected rate of 0.31 off-airport accidents per year by 0.0298, the probability of an accident occurring in the TCSP area is 0.0092 accidents per year, or about one accident every 109 years within or near the project boundaries.

¹ Note: this is a conservative estimate. According to the County of Ventura, there are approximately 70,000 operations per year.



In the event of an in-flight emergency, a pilot may need to land an aircraft at other than a prepared runway. As long as adequate emergency landing areas exist, the potential for an aircraft impacting a building is minimized and the chance of surviving a forced landing is enhanced. Recent nearby development has gradually eliminated some of the land previously available for emergency use. The proposed plan would add to the cumulative effect of diminishing land areas available for emergency landings.

While recent development has occurred near Oxnard Airport, there is still a large amount of land devoted to agricultural and greenbelt uses. In fact, the San Buenaventura-Oxnard Greenbelt Agreement specifies that much of the land west and north of the airport be designated for permanent agriculture and open space in accordance with a proposal made in the Open Space/Conservation Element of the Oxnard General Plan (City of Oxnard 1990). This land is depicted in Exhibit 2 of Appendix F. These areas may yet be able to serve as emergency landing areas, depending upon the location and nature of an in-flight emergency.

Due to the low probability of an accident occurring in the TCSP area, and the availability of emergency land areas, impacts related to airport safety hazards would be less than significant.

Mitigation Measures. No mitigation required.

Significance After Mitigation. Less than significant without mitigation.

Impact HAZ-6 **Development of the proposed TCSP would place manufacturing uses within 0.25 mile of a planned school site owned by Oxnard School District, potentially emitting hazardous emissions within one-quarter mile of a proposed school. However, compliance with existing regulatory requirements would minimize risks to schools and students, resulting in a less than significant impact. This is a Class III, less than significant, impact.**

No schools are proposed as part of the proposed TCSP. However, in February 2018, the Oxnard School District approved plans to build an elementary school and a middle school adjacent to the Plan Area on Doris Avenue. This potential school site would be located approximately 0.25-mile northwest of the 11.4-acre additional annexation area where manufacturing uses are proposed. The proposed project would involve new industrial or manufacturing uses that could involve the use, storage, disposal, or transportation of hazardous materials within 0.25 mile of proposed schools. Hazardous materials normally associated with industrial and manufacturing uses typically include lubricants, solvents, fuels, and oils and waste generated from the use of these materials. The exact types, quantities, and locations of these hazardous materials and wastes would depend on the specific uses of the developments.

New residential and commercial uses would not involve the use, storage, disposal, or transportation of significant quantities of hazardous materials. These uses may involve use and storage of some materials considered hazardous, though primarily these would be limited to solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies. These materials would not be different from household chemicals and solvents



already in general and wide use throughout the Plan Area. Uses in the Plan Area that sell, use, store, generate, or release hazardous materials must adhere to applicable federal, State, and local safety standards, ordinances, and regulations.

As mentioned in Impact HAZ-1 and the analysis above, construction associated with future development in the TCSP area may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. In addition, demolition of existing buildings and grading and excavation activities associated with new construction in the TCSP area may result in emissions and transport of hazardous materials within one-quarter mile of existing schools. However, adherence to applicable policies regarding emission and transport of hazardous materials would ensure impacts to schools from operation of development projects in the TCSP area would be less than significant.

Mitigation Measures. Mitigation measures are not required with adherence to existing regulations.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. Cumulative development in Oxnard and the surrounding area has potential to expose future area residents, employees, and visitors to current and historical use of hazardous materials. As indicated in Section 3.0, *Environmental Setting*, buildout analyzed in the City's 2030 General Plan would add between 34,355 and 82,355 residents to the City's current population. Continued urban development and added users of hazardous materials in the City of Oxnard will cumulatively increase the potential for exposure to existing hazards associated with hazardous materials and airports. Therefore, an overall increase in the potential for human health hazards will occur as urbanization occurs. However, the 2030 General Plan Program EIR found that impacts related to hazards and hazardous materials from implementation of the General Plan would be less than significant. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Implementation of appropriate mitigation measures, including remedial action on contaminated sites, would avoid potential hazard impacts associated with cumulative development in the City.

As discussed above, development in Airport Hazard Zones must be assessed by the FAA and VCALUC. Compliance with these regulations would reduce project-specific and cumulative impacts to a less than significant level.

Hazards and hazardous materials impacts associated with individual developments are site-specific in nature and must be addressed on a case-by-case basis. Since hazards and hazardous materials are required to be examined as part of the permit application and environmental review process, it is anticipated that potential impacts associated with individual projects will be adequately addressed and mitigated prior to permit approval. With implementation of site-specific mitigation measures, as outlined above for the project the project would not substantially contribute to significant cumulative impacts.



4.8 HYDROLOGY AND WATER QUALITY

This section analyzes the proposed project’s potential to adversely affect existing drainage facilities and stormwater quality. This section is partially based on the Teal Club Road Project Preliminary Drainage Report prepared by RBF Consulting in 2007 (included in Appendix G), the Teal Club Development Infrastructure Review prepared by Kennedy/Jenks in 2007 (included in Appendix K) , and the geological “due diligence” investigation prepared by Geolabs in 2004 (included in Appendix D).

4.8.1 Setting

a. Hydrology and Storm Drain System. The City of Oxnard is located in the Santa Clara River Watershed, which has an area of approximately 1,634 miles and is the largest river system in southern California remaining in a relatively undeveloped state. The headwaters of the Santa Clara River are located in the San Gabriel Mountains. The water flows westerly for approximately 84 miles through Ventura County to its outlet in the Pacific Ocean near the City of Ventura. The climate of the watershed is characterized by long, dry periods and a relatively short wet period during winter.

The City of Oxnard uses storm drain facilities maintained by the City of Oxnard Public Works Department Operations Division and Ventura County Watershed Protection District (VCWPD) to handle stormwater runoff. The drainage system eventually discharges to the Pacific Ocean. Table 4.8-1 lists the major drainage facilities located in Oxnard.

**Table 4.8-1
 VCWPD Drainage Facilities in Oxnard**

VCWPD Channels	Length (Miles)
Beardsley Wash	3.66
Camarillo Drain	0.37
Doris Avenue Drain	1.76
El Rio Drain	0.81
West 5th Street Drain	0.95
J Street Drain	2.37
Nyeland Drain	1.35
Oxnard Industrial Drain	3.44
Oxnard West Drain	2.48
Revolon Slough	2.48
Rice Road Drain	3.83
Wooley Road Drain	0.98
Unknown Name	1.15

Source: City of Oxnard Public Works Integrated Master Plan: Stormwater, 2016

The project area is generally flat. The TCSP area has a gradual slope towards the southwest. Runoff flow patterns are defined by the layout of the several separate farm fields and the general slope to the southwest. Drainage from the proposed TCSP area under existing conditions sheet-flows along the plowed row crops to shallow above-ground unlined drainage



ditches. The drainage is conveyed under project area unpaved access roads by small diameter culverts of various sizes and materials. The cumulative project area drainage is directed toward a 24-inch arched corrugated metal pipe culvert under Patterson Road in the southwest corner of the project area. This culvert outlets into an open unlined drainage ditch that runs west to Victoria Avenue along the north side of Teal Club Road. Drainage from the additional nine parcels proposed for Annexation sheet flows primarily toward the airport property to the south.

b. Flood Hazard Zones. The Federal Emergency Management Agency (FEMA) has defined the 100-year flood hazard areas through the publication of Flood Insurance Rate Maps (FIRM). The FIRM for the project area (Map ID 06111C0905E) indicates that the project area is within shaded Zone X, or "Other Flood Areas." Shade Zone X designates an area with a moderate risk of flooding, usually between the limits of the 100-year and 500-year floods. This zone is also used to "designate base floodplains of lesser hazards, such as areas protected by levees from 100-year flood, or shallow flooding areas with average depths of less than one foot or drainage areas less than one square mile" (FEMA, 2010).

c. Water Quality Regulations.

Federal, State and County Regulations. Direct discharges of pollutants into waters of the United States¹ are not allowed except in accordance with the National Pollutant Discharge Elimination System (NPDES) program established in Section 402 of the Clean Water Act (CWA). The foremost purpose of the NPDES program is to protect human health and the environment by protecting the quality of water. California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Board (RWQCB) broad powers to protect water quality and is the primary vehicle for implementation of California's responsibility under the federal CWA. 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.

All construction sites over one acre are subject to the State of California Construction General Permit (CGP), which regulates stormwater discharge from construction activities. The CGP requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) that contains specific actions, termed best management practices (BMPs), to control the discharge of pollutants, including sediment, into local surface water drainages. A Notice of Intent (NOI) to perform work under the Permit must be filed with the State.

The preparation of an SWPPP requires the developer to select a suite of BMPs that are designed to specifically address the potential pollution risks that will be incurred during project construction. BMPs are selected from an approved list of documents (i.e., the California Storm Water BMP Handbook, the Caltrans Storm Water Handbook, Ventura County Stormwater Quality Standard Sheet, the EPA database, and the ASCE database) which describe practices

¹ The term "waters of the U.S." incorporates deep-water aquatic habitats and special aquatic sites, including wetlands. Waters of the U.S. includes essentially all surface waters such as all navigable waters and their tributaries, all interstate waters and their tributaries, all wetlands adjacent to these waters, and all impoundments of these waters.



that have a proven track record of effectively preventing stormwater pollution on construction sites. BMPs appropriate for construction activities are organized into four major categories:

1. *Erosion Control: Measures that prevent erosion and keep soil particles from entering stormwater, lessening the eroded sediment that must be trapped, both during and at completion of construction.*
2. *Sediment Control: Feasible methods of trapping eroded sediments so as to prevent a net increase in sediment load in stormwater discharges from the site.*
3. *Site Management: Methods to manage the construction site and construction activities in a manner that prevents pollutants from entering stormwater, drainage systems or receiving waters.*
4. *Materials and Waste Management: Methods to manage construction materials and wastes that prevent their entry into stormwater, drainage systems, or receiving waters.*

Stormwater management control measures are also provided in the 2011 *Ventura County Technical Guidance Manual for Stormwater Control Measures* (TGM). The TGM provides guidance for the implementation of stormwater management control measures in new development and redevelopment projects in the County of Ventura and the incorporated cities therein. These guidelines are intended to improve water quality and mitigate potential water quality impacts. These guidelines have been developed to meet the Planning and Land Development requirements contained in Part 4, Section E of the Los Angeles RWQCB's municipal separate storm sewer system (MS4) permit (Order R4-2010-0108, NPDES Permit No. CAS004002) for Ventura County.

The VCWPD, County of Ventura and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley, and Thousand Oaks have joined together to form a program and are named as co-permittees under Order R4-2010-0108. The co-permittees are required to administer, implement, and enforce a Stormwater Management Program (SMP) to reduce pollutants in urban runoff to the "maximum extent practical." The SMP emphasizes all aspects of pollution control including, but not limited to, public awareness and participation, source control, regulatory restrictions, water quality monitoring, and treatment control. Controlling urban runoff pollution from new development and redevelopment projects during and after construction is critical to the success of the SMP. The Planning and Land Development Program is an element of the SMP being implemented by the co-permittees to specifically control post-construction urban runoff pollutants from new development and redevelopment projects. 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. In order to achieve this goal, Order R4-2010-0108 requires new development and redevelopment to control pollutants, pollutant loads, and runoff volume emanating from impervious surfaces by limiting the effective impervious area (EIA)² 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 development site. These requirements must be achieved through implementing best management practices (BMPs).

² *Effective Impervious Area (EIA): that portion of the surface area that is hydrologically connected via sheet flow over a hardened conveyance or impervious surface without any intervening medium to mitigate flow volume.*



The 2011 TGM lists BMPs and provides guidance on how to meet the requirements set forth in Order R4-1010-0108. Measures included in the 2011 TGM include:

- 1) **Site Design Principles and Techniques:** stormwater management strategies that emphasize conservation and use of existing features to reduce the amount of runoff and pollutant loading that is generated from a development site.
- 2) **Source Control Measures:** limit the exposure of materials and activities so that potential sources of pollutants are prevented from making contact with stormwater runoff.
- 3) **Retention BMPs:** stormwater BMPs that are designed to retain water onsite, and achieve a greater reduction in surface runoff from a project development site than traditional stormwater Treatment Control Measures. The term “Retention BMPs” encompasses infiltration, rainwater harvesting, and evapotranspiration BMPs. Retention BMPs are preferred and shall be selected over biofiltration BMPs and Treatment Control Measures where technically feasible to do so.
- 4) **Biofiltration BMPs:** vegetated stormwater BMPs that remove pollutants by filtering stormwater through vegetation and soils.
- 5) **Treatment Control Measures:** engineered BMPs that provide a reduction of pollutant loads and concentrations in stormwater runoff.

City of Oxnard. Oxnard City Code (OCC) Chapter 22, Article XII relates to stormwater quality management. The article implements the Clean Water Act by prohibiting non-stormwater discharges into the City’s municipal separate storm sewer system (MS4). OCC Section 22-219 requires a Storm Water 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

The Oxnard 2030 General Plan includes the following policies related to drainage and water quality:

- ICS-13.2** *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** *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** *Incorporate low impact development (LID) alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education.*



4.8.2 Impact Analysis

a. Significance Thresholds. According to the City's 2017 CEQA Guidelines, impacts would be considered potentially significant if the proposed project would:

1. *Cause a violation of any adopted water quality standards or waste discharge treatment requirements*
2. *Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).*
3. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in on- or off-site flooding or exceed the capacity of existing or planned stormwater drainage systems*
4. *Place new structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map*
5. *Impede or redirect flood flows such that it would increase on- or off-site flood potential*
6. *Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam*
7. *Be exposed to a substantial risk related to inundation by seiche, tsunami, or mudflow*

As stated in the *Setting* section, the project area is not within a 100-year flood hazard area. Further, the project area is not at risk from inundation by seiche, tsunami, or mudflow. Therefore, impacts related to flooding are discussed in Section 6.0, *Effects Found Not to Be Significant*. Impacts to groundwater supply and stormwater drainage systems are discussed in Section 4.16, *Utilities and Service Systems*. The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.8-2 lists the thresholds under consideration in the hydrology and water quality analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).



**Table 4.8-2
 Summary of Hydrology and Water Quality Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Cause a violation of any adopted water quality standards or waste discharge treatment requirements?		X		
2. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or of the local groundwater table level (e.g., the production rat of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?			X	
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in on- or off-site flooding or exceed the capacity of existing or planned stormwater drainage systems?			X	
4. Place new structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X	
5. Impede or redirect flood flows such that it would increase on- or off-site flood potential?			X	
6. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam			X	
7. Be exposed to a substantial risk related to inundation by seiche, tsunami, or mudflow?			X	

Impact HWQ-1 Construction activities that would occur in the project area through TCSP implementation and annexation of the additional parcels south of Teal Club Road would have the potential to increase erosion and sedimentation. If uncontrolled, this could adversely impact surface water and ground water quality or cause flooding. However, compliance with the NPDES Construction General Permit requirements would reduce temporary construction related water quality and flooding impacts to a Class III, *less than significant*, level.

Future development within the project area would include residential, commercial, business and research, manufacturing, and open space uses. Excavation and grading in the project area could result in erosion of project area soils and sedimentation during storms or high wind events. Development would also involve the removal of soil for the laying of structural foundations and/or the importation of soil as fill material. This would likely necessitate temporary stockpiling of soils on the construction site. During excavation, grading and soil stockpiling, there is potential for soil migration via wind entrainment and/or water erosion. In addition, structural and concrete residue/dust from demolition of surface parking lots and buildings could potentially migrate and adversely impact water quality. General construction activities would loosen and expose soils, potentially resulting in erosion and sedimentation.



During construction, groundwater quality may also be affected by the deposition of construction materials.

As discussed in the *Setting*, future development of planning areas in the TCSP area would involve ground disturbance of areas over one acre in size and development would be required to comply with the NPDES CGP. The CGP requires the preparation of a SWPPP with applicable BMPs to control discharge of pollutants from the construction site. The BMPs to be implemented during construction would be developed as part of the SWPPP (see Section (c) Water Quality Regulation above under *Setting* for more information about the kinds of BMPs that would apply to the project). Implementation of the SWPPP is the responsibility of the applicant with oversight and inspection by the City of Oxnard. Specific measures in the SWPPP must comply with NPDES CGP requirements. Implementation of BMPs would reduce the potential for construction associated with buildout of the project area to violate applicable waste discharge requirements. Compliance with applicable BMPs would reduce the potential for pollutants to enter groundwater or to leave the development site through wind or erosion and contaminate surface water.

In addition to project area development affecting water quality, the quantity of surface water may temporarily increase due to construction activities. This could create flooding in or adjacent to the project area. BMP implementation would require that water is retained on the individual development site in a low impact development facility. Therefore, the potential for flooding in and adjacent to the project area would be reduced.

With adherence to NPDES CGP requirements, impacts would be less than significant.

Mitigation Measures. Impacts would be less than significant without mitigation. Implementation of a SWPPP and required BMPs during construction would reduce temporary water quality impacts during the construction phases of future development in the TCSP area and additional Annexation area to a less than significant level.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact HWQ-2 Development in the project area would increase impervious surfaces, resulting in increased surface water pollutants. However, implementation of proposed stormwater detention in accordance with NPDES MS4 requirements would reduce the potential for runoff to contain pollutants during operation of the project. This would be a Class III, *less than significant*, impact.

The nine parcels south of Teal Club Road are partially developed, with a mix of vacant land (the westernmost three parcels) and residential development with ancillary vehicle storage and shop uses. These parcels would be zoned Light Manufacturing and could accommodate manufacturing uses. The majority of the TCSP area is comprised of undeveloped agricultural fields. Development accommodated under the TCSP would include commercial, residential, business and research, and park uses. Therefore, existing vacant land and agricultural fields (permeable surfaces) would be replaced with impermeable surfaces, including buildings, surface parking lots, and streets. These impermeable surfaces would reduce project area



stormwater infiltration compared to existing conditions, which could potentially result in increased peak stormwater runoff during storm events and downstream flooding.

These impermeable surfaces also have the potential to accumulate deposits of oil, grease, other vehicle fluids and hydrocarbons, or other potentially hazardous constituents. Common sources of polluted stormwater include vehicles, which produce traces of heavy metals deposited on streets and nutrients from fertilizers, including nitrogen and phosphorous. During a storm event, these deposits could flow into and through drainage channels and into the Pacific Ocean, thereby adversely affecting water quality.

Stormwater runoff can have a variety of harmful effects on water quality. Oil and grease contain a number of hydrocarbon compounds, some of which are toxic to aquatic organisms at low concentrations. Heavy metals such as lead, cadmium, and copper are the most common metals found in urban stormwater runoff. These metals can be toxic to aquatic organisms, and have the potential to contaminate drinking water supplies. Nitrogen and phosphorous can result in excessive or accelerated growth of vegetation or algae, resulting in oxygen depletion. The proposed TCSP would involve removal of project area agriculture uses. Therefore, during project operation, the amount of fertilizer use in the TCSP area would decrease compared to existing conditions and the potential for fertilizer in runoff would decrease.

The proposed stormwater system in the project area would be required to comply with the requirements of the *Ventura County Technical Guidance Manual for Stormwater Control Measures* (2011) under Order R4-2010-0108. The TGM provides guidance on design elements for stormwater control systems, as well as development of site-specific BMPs and LID measures, including bioretention, vegetated swales, sand filters, infiltration trenches, drywells and catch basins, which contribute to reduced peak stormwater runoff volumes and filter contaminants associated with stormwater runoff.

According to the Interim Hydromodification Control Criteria contained in the 2011 TGM, projects disturbing 50 acres or more must develop and implement a Hydromodification Analysis Study (HAS) that demonstrates that post development conditions are expected to approximate the pre-developed erosive effect of sediment transporting flows in receiving waters. The HAS must lead to the incorporation of project design features intended to approximate, to the extent feasible, an Erosion Potential value of 1, or any alternative value that can be shown to be protective of the natural drainage systems from erosion, incision, and sedimentation that can occur as a result of flow increases from impervious surfaces and damage stream habitat in natural drainage systems.

With adherence to the NPDES MS4 requirements and incorporation of appropriate BMPs contained in the 2011 TGM, drainage systems in the project area would adequately control stormwater runoff and any associated water contaminants. Therefore, impacts would be less than significant.

Mitigation Measures. Impacts would be less than significant with required adherence to existing regulations. No additional mitigation would be required.

Significance After Mitigation. Impacts related to polluted stormwater runoff would be less than significant.

Impact HWQ-3 Development in the project area would increase impervious surfaces, resulting in increased peak stormwater runoff flows, which could lead to flooding. However, implementation of proposed stormwater detention, storm drain improvements and infrastructure would maintain pre-development stormwater discharge rates, consistent with County requirements. Impacts would be Class III, less than significant.

The nine parcels south of Teal Club Road are partially developed, with a mix of vacant land (the westernmost three parcels) and residential development with ancillary vehicle storage and shop uses. These parcels would be zoned Light Manufacturing and could accommodate manufacturing and warehouse uses. The majority of the proposed TCSP area is comprised of undeveloped agricultural fields. Development accommodated under the proposed TCSP would include commercial, residential, business and research, and park uses. Much of the existing vacant land and agricultural fields (permeable surfaces) would be replaced with impermeable surfaces, including buildings, surface parking lots, and streets. These impermeable surfaces would reduce stormwater infiltration compared to existing conditions, which could potentially result in increased peak stormwater runoff during storm events and downstream flooding.

The TCSP includes measures that would improve drainage compared to existing conditions. Conceptually, the project area would generally drain into new storm drains in Teal Club Road and Patterson Road, with additional stormwater management provided by the proposed retention and project area infiltration areas shown on the Land Use Plan (Figure 2-3) as “stormwater treatment” areas. The precise configuration of the drainage system for proposed TCSP buildout would be determined with the review and approval of City staff at the time individual tract maps are prepared for each phase of the TCSP.

For buildout of the TCSP and any development on the nine additional parcels south of Teal Club Road, the developer would be required to comply with the requirements of the 2011 TGM under Order R4-2010-0108 which provides guidance on design elements for stormwater control systems, as well as individual development site-specific BMPs and LID measures, including bioretention, vegetated swales, sand filters, infiltration trenches, drywells and catch basins, which contribute to reduced peak stormwater runoff volumes and filter contaminants associated with stormwater runoff. The developer would also be required to comply with MS4 requirements, including the requirement to control post-development peak stormwater runoff discharge rates to maintain or reduce pre-development discharge rates.

According to a drainage report by RBF Consulting in 2007, project area drainage patterns would be changed slightly compared to existing conditions, but overall drainage discharge quantities and patterns would remain constant. The report determined that the proposed stormwater facilities and detention basins would adequately detain stormwater runoff and the runoff from the 10-year and 100-year storm event. Therefore, the proposed TCSP would comply with the MS4 requirement to maintain or reduce pre-development discharge rates. The conclusions contained in the Drainage Report are based on planned infrastructure during Phase 1 of the TCSP. (Please see Section 4.14, *Utilities and Service Systems*, for a discussion on impacts to



stormwater facilities). Because the proposed stormwater facilities and detention basins would be included in Phase 1 of the TCSP, if subsequent phases of the TCSP are delayed, stormwater facilities would remain adequate to prevent flooding.

With adherence to State and County regulations and technical guidance and individual tract map and project review and approval requirements of the City of Oxnard, development in the project area would not substantially increase discharge rates or modify existing drainage patterns. Moreover, project area development would comply with the requirements of the MS4 permit to maintain or reduce pre-development discharge rates. With these improvements, development of the TCSP area would not increase stormwater runoff such that flooding downstream occurs. Impacts would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. The proposed storm drainage system and adherence to existing regulations and technical guidance would reduce potential impacts related to peak stormwater flows to a less than significant level.

Impact HWQ-4 During excavation and grading in the project area, groundwater could be encountered on individual development sites. This may require temporary dewatering. However, impacts would be Class II, significant but mitigable.

Grading and site preparation in the project area would require excavation and fill. Two cone penetrometer tests (CPT) and one deep boring were used to obtain subsurface data. Groundwater was encountered at depths ranging from 8 to 10 feet below the existing ground surface (Geolabs, 2004). Therefore, grading or excavation associated with future development in the project area could result in the need for dewatering. If groundwater is contaminated, dewatering of contaminated water could result in exposure to hazards as runoff or disposal of contaminated water could contaminate stormwater systems. Therefore, groundwater dewatering may be required in the project area and impacts would be potentially significant.

Mitigation Measures. The following mitigation measure would be required to reduce impacts from encountering groundwater during excavation.

HWQ-4 Dewatering Program. Prior to the issuance of any grading permits in the project area, a qualified engineer, hydrologist or hydrogeologist shall estimate from the final engineering plans the volume of dewatering necessary for development within the project area. If dewatering is required, a dewatering program shall be designed to properly convey and treat dewatering discharge in accordance with the NPDES permits, as well as state and local regulations. The program shall be subject to the approval of the City of Oxnard Public Works Department. The program shall include development site design methods for treatment and conveyance of temporary and, if required, permanent dewatering discharge, including infiltration ponds, vegetated swales, and/or reuse for landscape irrigation. Prior to implementation of a



dewatering program, groundwater sampling shall be performed to ensure that the system is adequately designed and permitted to address project area groundwater conditions. Groundwater samples shall be analyzed for chemicals related to agricultural operations (i.e., pesticides and arsenic), petroleum hydrocarbons, and volatile organic compounds (VOCs).

Significance After Mitigation. Implementation of all requirements of the NPDES permits and local regulations, in conjunction with Mitigation Measure HWQ-4 would reduce impacts from encountering groundwater during excavation and grading to a less than significant level.

Impact HWQ-5 Buildout of the proposed TCSP and Annexation of the additional nine parcels on the south side of Teal Club Road would increase impervious surfaces in the project area, which could affect the location and amount of infiltration and thus interfere with groundwater recharge. However, based on the proposed hydrologic conditions in the project area, impacts would be Class III, less than significant.

The project area is in the Oxnard Plain Groundwater Basin. The Oxnard Plain Groundwater Basin is made up of two aquifer systems known as the Upper Aquifer System (UAS) and the Lower Aquifer System (LAS). The City currently has seven active wells and three wells under construction at Blending Station No. 1. None of the City's wells are located in the project area.

Because the majority of the existing project area is pervious, water can percolate directly into the ground. Development within the project area would include buildings, parking areas, and other hardscaping. The addition of this impervious surfacing on a currently pervious site could decrease infiltration into groundwater.

However, the developer would be required to reduce the post-development peak discharges at or below pre-development peak discharge rates in accordance with the MS4 permit requirements, including installing detention basins and bioswales. The proposed TCSP includes areas identified for "Stormwater Treatment" (see Land Use Plan Figure 2-3 in Section 2.0, *Project Description*) wherein some of these features could be located. Individual project area developments would be required to include on-site stormwater detention and infiltration. Overall, there would be areas where groundwater recharge could occur throughout the project area.

Further, the project does not involve the use of new groundwater wells that would pump local groundwater. As discussed in Impact UTL-2 in Section 4.14, Utilities and Energy, the proposed project would transfer approximately 500 AFY of ground water extraction allocations to the City via agriculture land converted to urban uses. The proposed project would not require additional ground water. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. Impacts would be less than significant.



Mitigation Measures. Impacts would be less than significant without mitigation.

Significance After Mitigation. Impacts would be less than significant.

Impact HWQ-6 The City of Oxnard is located in a Dam Inundation Zone, or Dam Failure Hazard Zone. However, the potential for a dam failure is considered low. Impacts would be Class III, less than significant.

Several dams are located at least 35 miles to the east and northeast of the project area. These include the Santa Felicia Dam at Lake Piru, the Castaic Lake Dam and the Pyramid Lake Dam. According to the *Multi-Jurisdictional Hazard Mitigation Plan for Ventura County* (2005), the entire City of Oxnard is located in a Dam Inundation Zone, or Dam Failure Hazard Zone, and 170,540 residents (approximately 98% of the population) are at risk from dam failure. Damage to the City could be in the form of a wall of fast-moving water, mud and debris. This could lead to injury or loss of life. However, according to the Oxnard 2030 General Plan, the potential for dam failure is low. According to the 2030 General Plan Program EIR, this is because it is assumed that all dams have been constructed to the specifications set forth by State and federal agencies. Additionally, regular inspections are conducted to identify any weaknesses or problems with the dams that could cause structural damage or overtopping. Furthermore, development of the project area would not increase the potential for dam inundation. Impacts related to dam inundation would be less than significant.

Mitigation Measures. Impacts would be less than significant without mitigation.

Significance After Mitigation. Impacts would be less than significant.

c. Cumulative Impacts. Cumulative development accommodated under the City's 2030 General Plan combined with development accommodated by the proposed project would increase impermeable surface area in the City. Development would potentially increase peak flood flows, alter drainage patterns, reduce groundwater recharge, and increase pollutants in the regional stormwater. These effects could occur during construction and operation of planned or pending projects. The 2030 General Plan Program EIR found that impacts related to hydrology and flooding would be less than significant.

All development would, however, be required to adhere to requirements of California, Ventura County, and the City of Oxnard, including compliance with the CGP, the NPDES MS4 Permit, and the 2011 *Ventura County Technical Guidance Manual for Stormwater Quality Control Measures*. The NPDES Permit and the 2011 TGM are specifically designed to develop, achieve, and implement a timely, comprehensive, and cost-effective stormwater pollution control program. The ultimate goal is to reduce pollutants in Ventura County stormwater discharges to the maximum extent practical. Thus, implementation of applicable requirements on all development in the City would reduce cumulative impacts to a less than significant level.

Implementation of NPDES, County, and City requirements would reduce the potential for increased pollutants in stormwater and groundwater, particularly because BMPs would be required on all development sites. These requirements would also decrease operational effects of cumulative development because each development proposal would be required to reduce



the post-development peak discharges at or below pre-development peak discharge rates. Implementation of this requirement on all new development would reduce cumulative impacts to area hydrology to a less than significant level. As discussed above, the storm drainage system proposed for the project would result in similar peak stormwater flows due to the proposed detention basin systems and bypass channel. Additionally, the detention basins and other BMPs would reduce the potential for polluted stormwater and groundwater. Thus, implementation of the project would not contribute to any cumulative increases in peak runoff or associated flooding impacts. Because implementation of the project would not expose residents or structures to flood hazards, the project would not result in cumulative effects regarding flooding.



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4.9 LAND USE AND PLANNING

4.9.1 Setting

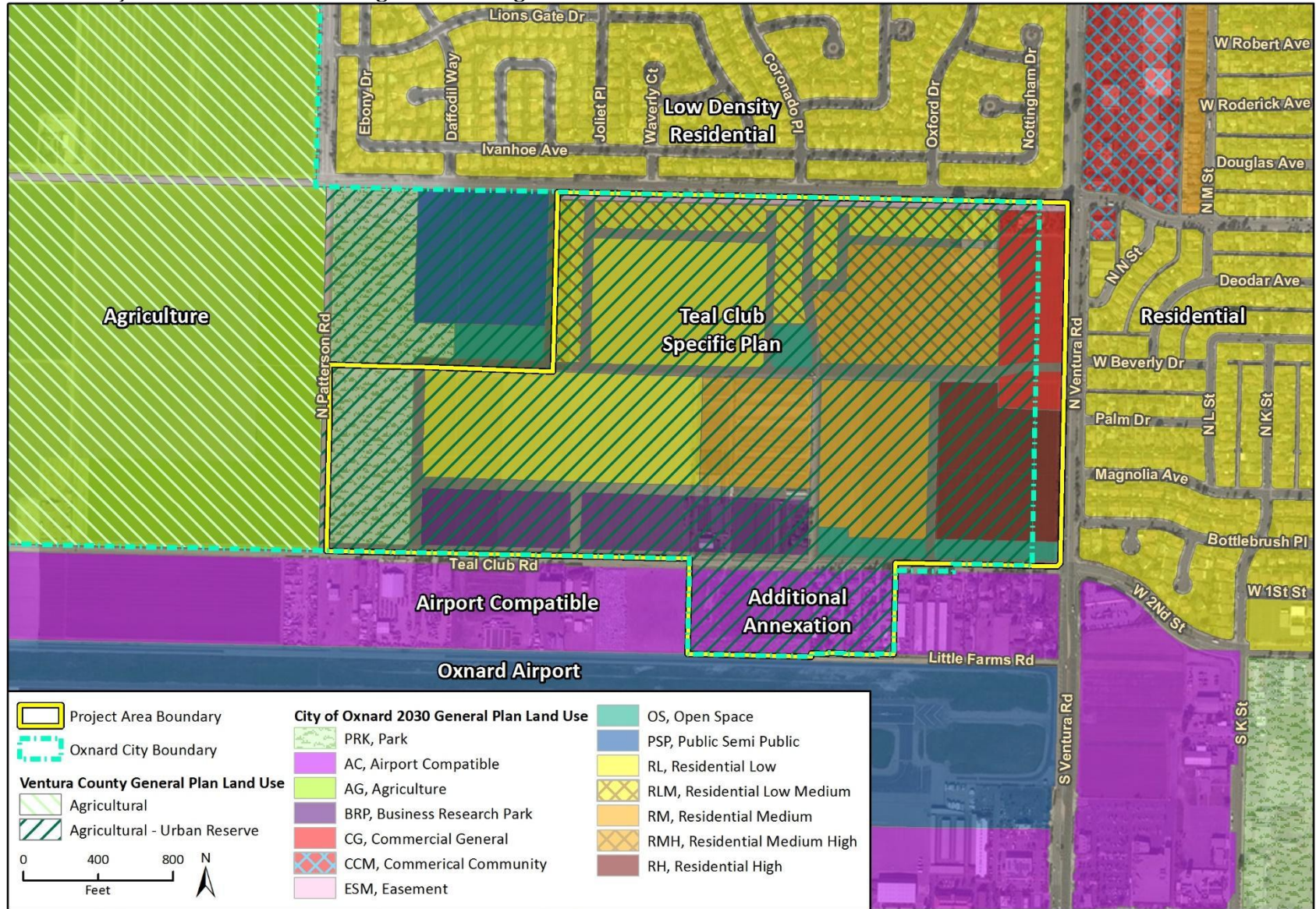
a. Citywide Land Use. The City of Oxnard is an incorporated area of approximately 26.9 square miles (17,230 acres) and the City's Planning Area includes additional surrounding unincorporated areas for a total of 43 square miles (27,526 acres), which includes the project area. Bordered by the farmland of the Oxnard plain and the Pacific Ocean, the City's urban development is clustered in a core area mostly surrounded by rural open areas and agriculture. The predominant land use in the City is residential. Commercial, industrial, institutional, open spaces and other uses are also represented. Oxnard's historic land use pattern reflects the City's central location in the Oxnard plain with surrounding agriculture, as Oxnard grew in all directions from the original small town founded in 1903. With the exception of several high rise buildings in north Oxnard, the City is characterized predominantly by one- or two-story residential and commercial buildings and several industrial areas. Most of the City's higher intensity development lies adjacent to primary thoroughfares such as Highway 101, Gonzales Road, Rose Avenue, Rice Avenue, Oxnard Boulevard, Hueneme Road, Ventura Road, Victoria Avenue, Saviers Road, and in the Downtown.

b. Site and Surrounding Land Uses. The majority of the 161-acre project area (the 149.72-acre proposed TCSP area plus the 11.4 additional acres proposed for Annexation) is located in unincorporated Ventura County while two parcels (totaling 7.6- acres) are located in the City of Oxnard. The entire TCSP area is located within the City of Oxnard's Sphere of Influence and City Urban Restriction Boundary (CURB) line. The TCSP portion of the project area is in active agricultural use and currently cultivated with row crops. There are several agricultural accessory buildings in the TCSP area, the largest being a barn and greenhouses in the central-southern portion along Teal Club Road. The TCSP area also supports two single-family residences, one just east of the barn and one in the northeastern corner of the site at Doris Avenue and North Ventura Road. The nine additional parcels to be Annexed south of Teal Club Road are a mix of vacant land (the westernmost three parcels) and approximately six residences with ancillary vehicle storage and shop uses (the easternmost six parcels). Figure 2-2 in Section 2.0, *Project Description*, shows the project area's location and an aerial view of the project area and surrounding uses. The project area, as a whole, is surrounded by residential neighborhoods to the north (Cabrillo) and east (Fremont South), by active agricultural operations and a site owned by the Oxnard School District and planned for new educational facilities (a district office, a 700-student elementary school and a 1,200-student middle school) to the west, and by the Oxnard Airport and associated industrial land uses to the south. The area between the TCSP area and the airport is a mix of residential and commercial development and several vacant parcels. This area includes the nine additional parcels proposed for Annexation.

c. Regulatory Setting. Development in the City is subject to the policies and development guidelines contained within the City's 2030 General Plan and the City's zoning regulations. The Ventura County Local Agency Formation Commission and the Oxnard Airport policies and regulations are also applicable to the proposed project. Figures 4.9-1 and 4.9-2 show the existing land use and zoning designations, respectively, of the project area and vicinity.



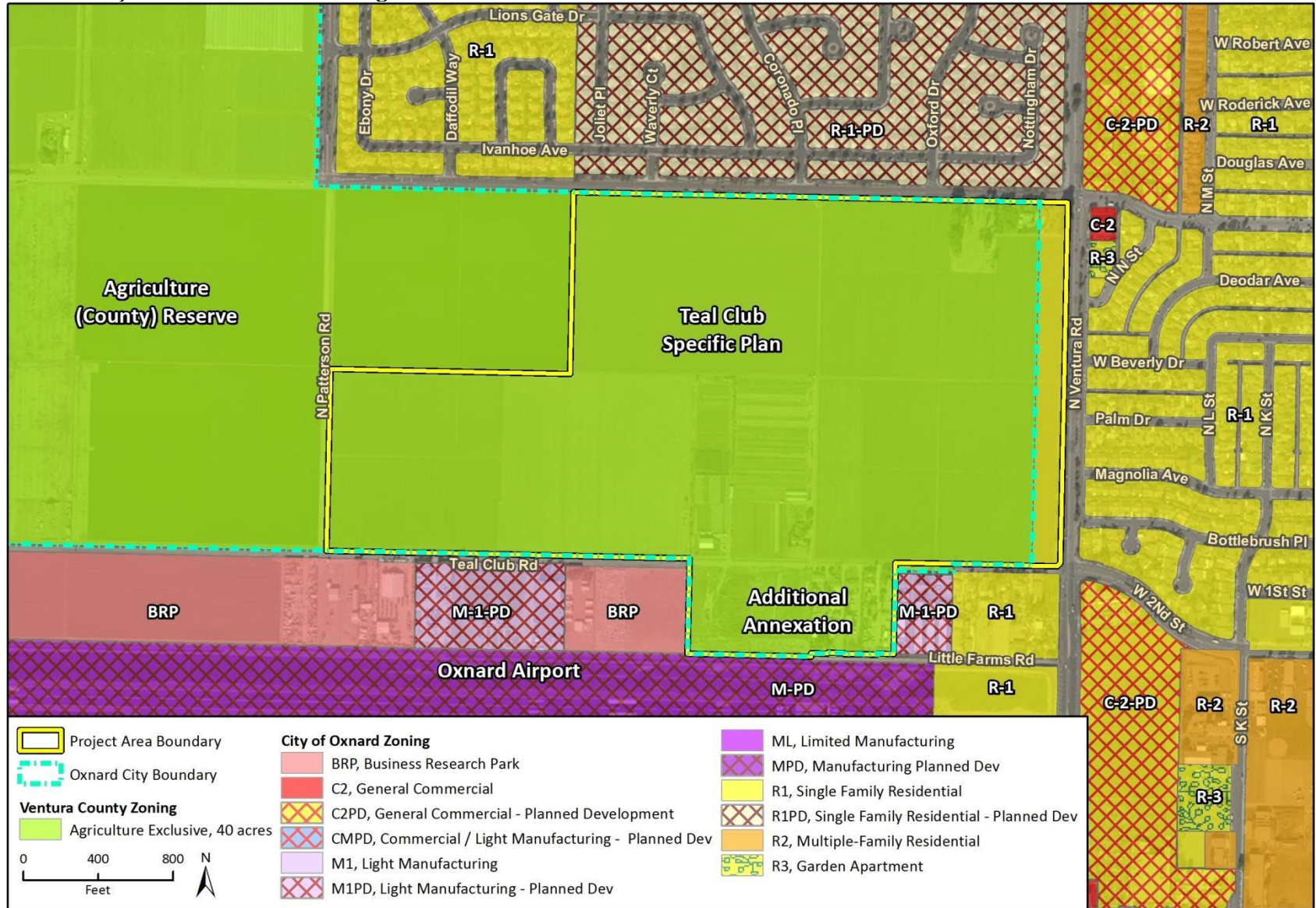
Figure 4.9-1 Project Site and Surrounding Area Zoning



Imagery provided by Microsoft Bing and its licensors © 2019. Additional data provided by City of Oxnard GIS and Planning, September 2012.
 Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc. Additional data provided by County of Ventura 2018.

Fig 4.9-1 LU Design Proj Site and Vic

Figure 4.9-2 Project Site and Surrounding Area Land Use



Imagery provided by Microsoft Bing and its licensors © 2019. Additional data provided by City of Oxnard GIS and Planning, September 2012.
 Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc. Additional data provided by County of Ventura 2018.

Fig 4.9-2 Zoning Design Proj Site and Vic

County of Ventura General Plan. The majority of the project area is currently located within unincorporated Ventura County, with the exception of two parcels which are located within the City of Oxnard. The entire TCSP area is within the City of Oxnard's Sphere of Influence and City Urban Restriction Boundary (CURB) line. The proposed project includes Annexation of the project area to the City of Oxnard. The proposed TCSP area and the nine additional parcels to be Annexed south of Teal Club Road are designated Agricultural-Urban Reserve in the Ventura County General Plan (last amended by the Ventura County Board of Supervisors in September 2020).

City of Oxnard 2030 General Plan. Two parcels in the TCSP area are located within the City of Oxnard, and the TCSP area is entirely within the Oxnard Sphere of Influence and CURB. The 2030 General Plan was adopted in October, 2011. The 2030 General Plan includes the seven State-required General Plan elements (land use, circulation, housing, open-space, conservation, safety, and noise) within five chapters, each divided into a Background document and companion Goals and Policies document. The 2013-2021 Housing Element is incorporated by reference into the 2030 General Plan document as Chapter 8. The 2030 General Plan also includes a separate chapter on sustainable community development that addresses topics of climate change, alternative energy, and the implementation of Senate Bill 375.

A comprehensive General Plan provides a city with a consistent framework for land use and other decision-making. The General Plan has been called the “constitution” for land use development to emphasize its importance to land use decisions. The General Plan and its maps, diagrams, and development policies form the basis for city zoning, subdivision, and public works actions.

The Community Development Element (within 2030 General Plan Chapter 3) designates the general distribution and intensity of land uses within the planning area. The Infrastructure and Community Services Element (within Chapter 4) identifies the general location and extent of existing and proposed transportation facilities. The Housing Element (2030 General Plan Chapter 8) is a comprehensive assessment of current and future housing needs for all segments of the city population, as well as a program for meeting those needs. The Environmental Resources Element (within 2030 General Plan Chapter 5) describes measures for the preservation of open space for the protection of natural resources, the managed production of resources, and for recreation and public health and safety. The Environmental Resources Element (within 2030 General Plan Chapter 5) addresses the conservation, development, and use of natural resources. The Safety and Hazards Element (within 2030 General Plan Chapter 6) establishes policies to protect the community from risks associated with natural and human-made hazards such as seismic, geologic, flooding, wildfire hazards, and air pollution. The Safety and Hazards Element (within 2030 General Plan Chapter 6) also identifies major noise sources and contains policies intended to protect the community from exposure to excessive noise levels.

The proposed TCSP area is pre-designated “Urban Village” in the City of Oxnard 2030 General Plan. As defined in 2030 General Plan Goal CD-7, Urban Villages are intended to support “development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.” The additional nine parcels



proposed for Annexation south of Teal Club Road are designated for Airport Compatible land uses, as shown on the Oxnard 2030 General Plan land use map.

Airport Land Use Plan. The project area is within the planning area, or Land Use Study Area, of the Oxnard Airport, a general aviation facility owned and operated by the County of Ventura. The County of Ventura has prepared the Airport Comprehensive Land Use Plan (CLUP) to “provide for the orderly growth of each public airport and the area surrounding the airport... [and] safeguard the general welfare of the inhabitants within the vicinity of the [Oxnard] airport and the public in general” (California Public Utilities Code Section 21675). Prior to making a decision on the proposed project, the City of Oxnard must refer the proposed project to the Ventura County Airport Land Use Commission (ALUC) for review and comment. The ALUC will review the project for consistency with the CLUP. The CLUP includes policies related to surrounding land uses and exposure to airport noise and hazards. Various regulations of the Federal Aviation Administration also apply to land use and structural development in proximity to active airports.

State law outlines a specific process that is to be followed to obtain an official determination from the Commission. Specifically, state law requires that specific types of legislative acts and regulations within areas covered by the Plan must be submitted to the Commission for a determination of whether the development is consistent with the Plan. If the Commission determines that the proposed action is inconsistent with the Plan, then the City has the option of overruling the Commission. That, however, can only occur if at least 2/3rds of the City Council (i.e., five members) vote to make specific findings that the proposed action is consistent with specific provisions of state law regarding the orderly development of airports, including preventing the creation of new noise and safety problems.

At least 45 days prior to the City Council’s decision to consider whether to override the decision of the Commission, the City Council must provide the Commission and Caltrans’ Division of Aeronautics with the proposed decision and findings. The Commission and Division of Aeronautics may provide comments to the City Council within 30 days of receiving the proposed decision and findings. The City Council is to include comments from the Commission and the Division of Aeronautics in the final record of any final decision to overrule the airport land use commission.

City of Oxnard Zoning Ordinance. The County of Ventura currently zoned the entire project area as Agricultural Exclusive with a minimum lot size of 40 acres (AE-40). Upon Annexation, each Planning Area within the proposed TCSP area would have a City zone to reflect the specific uses approved for the site. Upon Annexation, the additional nine parcels proposed for Annexation south of Teal Club Road would be zoned Light Manufacturing (M-1) by the City of Oxnard. The purpose and intent of the M-1 Zone district is described in the Municipal Code in Section 16-160 as follows:

“The purpose of the M-1 Zone is to provide areas for manufacturing and related service uses and activities where the principal activity occurs within a building, but also permits outdoor assembly, fabrication, public services, and storage that conform to the development and performance standards of this chapter, and provide areas suitable for adult businesses. Industrial uses in this zone shall be limited to those that conduct fabrication, assembly, or land processing of materials (including agricultural produce)



primarily within a building. The development and performance standards of this chapter limit the creation of smoke, gas, odor, dust, sound, and vibration that might be detrimental to health, safety, and welfare to protect any adjoining uses. Wholesale and retail sales and services related to principal uses are permitted. Limited outdoor storage associated with a primary use may be permitted."

Maximum building height in the M-1 Zone is 55 feet and maximum lot coverage is 70%.

Ventura County Local Agency Formation Commission. The Ventura County Local Agency Formation Commission ("LAFCo") was formed and operates under the provisions of state law, specifically what is now known as the 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 Spheres of Influence, Incorporations, Annexations, Reorganizations and other changes of organization. In this capacity the Ventura County LAFCo is the boundary agency for cities and most special districts in Ventura County, empowered to review, approve or deny proposals for boundary changes, including Annexations, and incorporations for cities, counties, and special districts.

In considering whether to approve or deny the proposed Annexations to the City of Oxnard, LAFCo must assess consistency of the annexations with LAFCO's adopted policies and standards. LAFCo has also adopted standards for Annexation to cities and districts, general boundary criteria, and agriculture and open space preservation, among others.

Southern California Association of Governments. The project is located within the jurisdiction of the Southern California Association of Governments (SCAG), which includes Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial Counties. To facilitate planning activities for such a large region, SCAG has divided its jurisdiction into a number of sub-regions. The TCSP area is located within the Ventura Council of Governments Sub-region, which includes the Cities of Agoura Hills, Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley, Thousand Oaks, and Westlake Village, as well as the County of Ventura.

To coordinate regional transportation planning efforts and in response to Federal air and water quality laws, SCAG has prepared a Regional Comprehensive Plan (RCP). The RCP is a major advisory plan prepared by SCAG that addresses important regional issues like housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance.

4.9.2 Impact Analysis

a. Methodology and Significance Thresholds. According to the City of Oxnard's 2017 CEQA Guidelines, the proposed project would have a significant impact on land use if it would cause any of the following conditions to occur:



- 1) *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 an environmental effect;*
- 2) *Involve land uses that are not allowed under an applicable airport land use compatibility plan;*
- 3) *Conflict with an applicable habitat conservation plan or natural community conservation plan; or,*
- 4) *Physically divide an established community.*

The site is not protected by a habitat conservation plan, natural community conservation plan, or other adopted conservation plan. Therefore, impacts related to conservation plans are discussed in Section 6.0, *Effects Found Not to Be Significant*. The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects. The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.9-1 lists the thresholds under consideration in the land use and planning analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.9-1
 Summary of Land Use and Planning Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. 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 an environmental effect?		X		
2. Involve land uses that are not allowed under an applicable airport land use compatibility plan?		X		
3. Conflict with an applicable habitat conservation plan or natural community conservation plan?		X		
4. Physically divide an established community?			X	

Impact LU-1 The proposed project would not physically divide an established community. This is a Class III, less than significant, impact.

The project area is located where the urban City of Oxnard meets the agricultural unincorporated County lands west of the City boundary. It is surrounded on its other three sides, to the north, east and south, by urban development and airport uses. Implementation of the proposed Specific Plan and buildout of the additional Annexation parcels with industrial land uses would continue the residential and commercial development pattern surrounding the site, but would not cut off connected neighborhoods or land uses from each other. In fact, it would enhance connectivity through the project area by providing through streets and



sidewalks. No new roads, linear infrastructure or other development features are proposed that would divide an established community or limit movement, travel or social interaction between established land uses.

Mitigation Measures. As impacts would be less than significant, no mitigation is necessary.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact LU-2 The proposed project is potentially inconsistent with applicable land use plans, policies and regulations such that an environmental impact may occur. This is a Class II, significant but mitigable impact.

The City of Oxnard's 2030 General Plan is the primary policy planning document that guides land use in the City. Proposed Specific Plans and development projects must be consistent with the 2030 General Plan's land use designations, goals, policies and objectives in order to be approved. As discussed under Goal CD-7, the 2030 General Plan specifically identifies the proposed TCSP area as an "Urban Village" with the range of land uses proposed in the TCSP, and indicates that a Specific Plan is the appropriate planning approach to the project area. Accordingly, the proposed project includes a request that the City adopt the Teal Club Specific Plan for the TCSP area portion of the project area. The nine parcels south of Teal Club Road proposed for Annexation and zone change to Light Manufacturing (M-1) are designated Airport Compatible, which includes low intensity commercial and industrial uses that are compatible with the adjacent airport operations. Thus, the proposed Annexation, Specific Plan and M-1 zone change are consistent with the general intent of the 2030 General Plan land use designations for the project area. Mitigation measures as described throughout this EIR and included in sections 4.1, *Aesthetics*, 4.2, *Agricultural Resources*, 4.3, *Air Quality*, 4.5, *Geology and Soils*, 4.7, *Hazards and Hazardous Materials*, 4.8, *Hydrology and Water Quality*, 4.10, *Noise*, and 4.13, *Transportation and Traffic*, further ensure consistency with relevant policies.

Table 4.9-1 contains a discussion of the TCSP's consistency with applicable policies of the City's 2030 General Plan. Consistent with the scope and purpose of this EIR, the discussion primarily focuses on those policies that relate to avoiding or mitigating environmental impacts. See Section 4.6, *Greenhouse Gas Emissions/Climate Change* for discussion of the Specific Plan's consistency with policies directly related to greenhouse gas emissions. The ultimate determination of whether the proposed project is consistent with the 2030 General Plan lies with the decision-making bodies (Planning Commission and City Council). Only policies relevant and applicable to the TCSP are included. Policies that are redundant between elements are omitted or combined. Policies that call for City actions that are independent of review and approval or denial of the proposed project are also omitted. As discussed above, the proposed M-1 zoning for the additional nine Annexation parcels is consistent with the City's land use designation for those parcels; a more detailed assessment of policy consistency is not possible at this time or necessary because no specific development is proposed on those parcels as part of the project, and any future development on the additional nine Annexation parcels would be reviewed for consistency with the General Plan in effect at that time.)



According to the consistency procedure outlined in Chapter 9 of the 2030 General Plan, the City has a three-level procedure for determining consistency. The three levels are defined by the relationship between the 2030 General Plan goal and its representative implementing policies and the proposed project. The three levels are:

- I. Direct Applicability to the Proposed Project
- II. Related or Indirect Applicability to the Proposed Project
- III. No or Distant Applicability to the Proposed Project

A 2030 General Plan consistency analysis starts by categorizing all 2030 General Plan goals into one of the three consistency levels as they relate to the proposed project. Each Level I classification is supported by a narrative of appropriate length explaining the relationship between the 2030 goal and the proposed project. Level II classifications are listed into one or more groups with a summary narrative explaining the relationship between the 2030 goal and the proposed project. Level III goals are assumed to be all goals not classified as Level I or Level II and do not have to be individually listed in a consistency analysis. After the Level I and II goals are identified, consistency is found (or not found, as the case may be) for each identified goal. For Level I goals, the consistency standard is that the proposed project furthers at least one of the goal’s implementing policies and otherwise does not inhibit achievement of remaining policies. For Level II goals, the consistency standard is that the proposed project shall not significantly inhibit achievement of the goal or its implementing policies.

Level III policies are not included in Table 4.9-2. Level I and Level II policies are included and are identified as either Level I or II in the narrative discussion.

**Table 4.9-2
 2030 General Plan Policy Consistency**

General Plan Policy	Discussion
Sustainable Community	
<i>SC-3.1. New Residential Development. Encourage incorporation of passive and active energy and resources conservation design and devices in new residential development and substantial remodels and/or expansions.</i>	<u>Level II - Consistent.</u> Mitigation Measures AQ-2(b) and AQ-2(c) require that construction and building management contracts for residential development within the TCSP include energy saving requirements mandated by State Green Building Code, as amended during the life of the project.
<i>SC-3.8. Require Use of Passive Energy Conservation Design. As part of the City and Community EAP’s, require the use of passive energy conservation by building material massing, orientation, landscape shading, materials, and other techniques as part of the design of local buildings, where feasible.</i>	Mitigation AQ-2(c) also required that all structures include passive energy conservation design elements, including building material massing, orientation, architectural elements (deeply recessed windows, eave overhangs, etc.), landscape shading, recycled or low-impact materials, window glazing to increase insulation, and water circulation pumps to reduce water use, and/or similar measures shown to be equally effective. This mitigation measure that applies to all development proposed within the TCSP and within the nine parcels proposed for Annexation.
<i>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.</i>	<u>Level II - Consistent.</u> Mitigation Measure AQ-2(e) requires all applicants for all projects within the TCSP area and within the nine parcels proposed for Annexation to include natural ventilation in building design plans whenever feasible, as required by the State Green Building Code, as amended during the life of the project.



General Plan Policy	Discussion
Community Development	
<p><i>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).</i></p>	<p><u>Level I - Consistent.</u> The TCSP consists of traditional neighborhood design components that promote “porch and street orientation” and encourage walking and interaction between residents. High, Medium, and Medium-High Density areas would orient to internal pathways and common areas with connection to the public walking network and to the Urban Village. The Urban Village would be oriented around a public plaza, and would be within walking distance of residential units and readily accessible to a new bus stop on Ventura Road (Section 2.0, <i>Project Description</i>).</p>
<p><i>CD 1.5. Housing Variety. Promote the development of a variety of housing types throughout the City including apartments, condominiums, lofts, townhouses, and attached and detached single family units.</i></p>	<p><u>Level I - Consistent.</u> The TCSP envisions development of up to 990 residential dwelling units in a variety of densities and product types including both market-rate and affordable housing. In addition to single-family residential units, the TCSP includes single-family courtyard homes, single-family townhomes and multi-family condominiums and apartments (Section 2.0, <i>Project Description</i>).</p>
<p><i>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.</i></p>	<p><u>Level I - Consistent.</u> . The TCSP includes a 6.5-acre public (City) Community Park (PA 8) with playground equipment, picnic tables, restrooms, and backstops and fencing for softball/baseball play and soccer use. Within the residential and commercial PA’s, a 6.5-acre community park, a 3.5-acre community park, and a 7.4-acre community park combine for a total of 17.4 park and open space acres. Combined with the Beverly Dr. greenbelt, the TCSP would provide 17.8 gross acres of public parks and open space, about 12% of the project acreage.</p>
<p><i>CD 1.7. Compact Development. Promote the use of development patterns that are more compactly built and use space in an efficient aesthetic manner as part of the community vision.</i></p>	<p><u>Level I - Consistent.</u> High-density residential zones are 30 or more dwelling units per acre and medium-high zones are 18 to 30 dwelling units per acre, as described in the City of Oxnard General Plan 2030. The TCSP would include maximum densities of between 10 and 30 dwelling units per acre. The general distribution of densities for the site is included in the 2030 General Plan Land Use map, and the proposed TCSP generally adheres to that distribution.</p>
<p><i>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.</i></p>	<p><u>Level I - Consistent.</u> As discussed in Section 4.4, <i>Biological Resources</i>, the project area does not include any natural open space areas, as it is currently used for agricultural activities and urban development. The project area is adjacent to agricultural areas to the west that are outside of the CURB boundary. Approximately 17.76 acres of open space and parks are proposed within the TCSP area. As discussed in Section 4.12 <i>Public Services and Recreation</i>, this acreage would exceed the required 12 acres of parkland for the project.</p>
<p><i>CD 1.9. Commute Reduction. Minimize the commuting distances between residential concentrations and employment centers by encouraging the development of mixed land uses in appropriate areas.</i></p>	<p><u>Level I - Consistent.</u> High, Medium, and Medium-High Density areas in the TCSP would orient to internal pathways and common areas with connection to the public walking network, the proposed Business Research Park zone (PA 13 and 14), the proposed commercial zones (PA 6 and 7), and the nine parcels south of Teal Club Road which would be rezoned for employment-generating uses.</p>



General Plan Policy	Discussion
<p><i>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.</i></p>	<p><u>Level I - Consistent.</u> The TCSP includes residential uses, as well as retail, office, and a business and research park, which would offer job opportunities to residents. The adopted VCOG 2040 forecast projects a total of 83,328 jobs and 71,602 households for the City of Oxnard by the year 2040. Therefore, the 2040 jobs/housing ratio would be 1.16:1 which is within the range of 1.1 and 1.34 jobs per housing unit, the acceptable jobs/housing ratio range identified by the VCOG (VCOG, May 2008). With the additional 2,651 jobs and net increase of 988 housing units under the proposed Specific Plan, the jobs/housing would change to 1.18:1 (more skewed towards a greater number of jobs than housing units) but would still be within the acceptable jobs/housing ratio. Therefore, the project would not move the City's ratio out of the VCOG range.</p>
<p><i>CD 1.12. Avoiding Encroaching the Oxnard Airport. Retain land within the airport hazard area as permanent open space as shown on the Land Use Map or otherwise recommended by the County Department of Airports.</i></p>	<p><u>Level II - Potentially Consistent.</u> Development of the Specific Plan would place residential and commercial uses within 2,000 feet of the Oxnard Airport runway, potentially exposing people residing and working in the area to safety hazards. However, no habitable development is proposed within the airport's inner or outer safety zone, and as discussed in Section 4.7, <i>Hazards and Hazardous Materials</i>, the probability of an accident occurring in the Plan Area is low. Further, the presence of nearby emergency landing areas would reduce accident hazards. Safety would be further ensured through mitigation measures HAZ-5(a-c). Prior to making a decision on the proposed project, the City of Oxnard must refer the proposed project to the ALUC for review and comment. The ALUC would then review the project for consistency with the Airport Comprehensive Land Use Plan. The City must consider the comments of the ALUC prior to making a decision on adoption of the Specific Plan.</p>
<p><i>CD 3.1. Neighborhood Preservation. Protect existing residential neighborhoods from the encroachment of incompatible activities and land uses as determined through environmental review and/or determination by the Planning Commission.</i></p>	<p><u>Level II - Consistent.</u> The development within the TCSP would be compatible with the existing residential neighborhood located to the north of the TCSP area. The proposed Urban Village would locate residential uses adjacent to the existing residences. Residences to the east are across Ventura Road from the project area, which would provide a buffer from the neighborhood commercial and higher density residential uses proposed in the eastern portion of the TCSP area.</p>
<p><i>CD 4.1. Mitigate Land Use Conflicts. Mitigate conflicts between commercial and other land uses, especially residential and recreational uses.</i></p>	<p><u>Level II - Consistent.</u> Proposed commercial uses in the TCSP would not be located directly adjacent to any existing residential or recreational uses. Existing residences to the east of proposed commercial land use in PA 6 and 7 are across Ventura Road from the project area, which would provide a buffer from the neighborhood commercial uses.</p>
<p><i>CD 5.1. Industrial Clustering. Encourage the clustering of industrial uses into areas that have common needs and are compatible in order to maximize their efficiency.</i></p>	<p><u>Level II - Consistent.</u> The nine parcels (11.4 acres combined) to be Annexed south of Teal Club Road are a mix of vacant land and existing small residential and industrial development. Upon Annexation, these nine parcels would be zoned Light Manufacturing (M-1) by the City of Oxnard and would encourage the clustering of industrial uses. The airport area is designated by the City as an area where industrial uses are allowed. Business and Research Park uses are also proposed for the TCSP area nearest to the airport (PA 13 and 14).</p>



General Plan Policy	Discussion
<p><i>CD 5.2. Compatible Land Use. Ensure adequate separation between sensitive land uses (residential, educational, open space, healthcare) to minimize land use incompatibility associated with noise, odors, and air pollutant emissions.</i></p>	<p><u>Level II - Consistent.</u> The proposed industrial component of the Specific Plan would be compatible with existing industrial uses as well as the adjacent agricultural, open space, and residential land uses with incorporation of the mitigation measures specified in Section 4.2, <i>Agriculture</i>. See Section 4.7, <i>Hazards and Hazardous Materials</i> and Section 4.10, <i>Noise</i> for further discussion regarding compatibility. The proposed Business and Research Park uses in PA 13 and 14 would not include heavy manufacturing uses likely to produce incompatible odors.</p>
<p><i>CD 5.3. Available Services. Encourage industrial activities to locate where municipal services are available including adequate storm drainage and water facilities, as well as easy access to multiple modes of transportation.</i></p>	<p><u>Level I - Consistent.</u> The nine parcels (11.4 acres combined) to be Annexed south of Teal Club Road are a mix of vacant land and existing small residential and industrial development. Municipal services currently exist in this area including water and sewer lines. When projects are proposed within the nine parcels and in the TCSP area, they would be required to comply with this 2030 General Plan policy and with existing regulations for stormwater. The project area is accessible to bicycle lanes and bus stops.</p>
<p><i>CD 5.5. "Green" Major Transportation Routes. Guide industrial development to locate near transportation facilities capable of handling goods movements in an efficient manner without decreasing the level of service on the transportation network or dividing existing neighborhoods.</i></p>	<p><u>Level I - Consistent.</u> Industrial development would be located in the vicinity of major transportation routes including Ventura Road, Fifth Street and Victoria Avenue, and would not divide an existing neighborhood, as discussed above under Impact LU-1. The nine parcels south of Teal Club Road proposed for Annexation, which could be rezoned for industrial uses, are located adjacent to the Oxnard Airport, generally surrounded by other industrial land uses and commercial development, and no existing neighborhood is located on either side of the parcels. The parcels are located within 2.5 miles of Highway 101, a major transportation route.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.2, <i>Agricultural Resources</i>, and Mitigation Measure AG-2, which requires interim agricultural buffers, Phase 1 would include 91.83 acres of the site and interim agricultural buffers are proposed to allow Phase 2 owners to continue farming indefinitely. Phase I would also include all internal roadway circulation needed to service Phase 1. Proposed agricultural buffers would be 300 feet or 150 feet wide with a double row of appropriate trees (windrows). All proposed Phase 1 roads would be built and operable; residences for lots in the Phase 1 area within 150-foot buffers would not be built until Phase 2 is committed to development. Trespassing, vandalism, and pilferage impacts would be reduced through the development of the Community Park separating agricultural production and proposed urban land uses. Agricultural uses to the west would be buffered by open space planning areas and North Patterson Road. Finally, the community park (PA 10) would provide a buffer between the residential and business park use and agricultural use to the west.</p>
<p><i>CD 6.2. Agricultural Preservation. Preserve agricultural land and uses within the Oxnard Planning Area unless other uses are allowed through a future CURB amendment and/or applicable exemptions.</i></p>	<p><u>Level II - Consistent.</u> When voters approved the city's Save Open Space and Agricultural Resources ("SOAR") initiative in 1998, the Teal Club site was located inside the urban growth boundary ("CURB").</p>



General Plan Policy	Discussion
<p><i>CD-7.1 Establishment of Urban Villages: Six areas of the City are initially designated as Urban Villages. It is the intent of the Urban Village designation that specific or strategic plans for each area will be prepared in advance of the planning entitlement process. Additional Urban Villages and guidelines may be subsequently adopted by the City Council*. Urban Villages are envisioned as characterized by:</i></p> <ul style="list-style-type: none"> ● <i>Infill and/or development of formerly agricultural land</i> ● <i>Reinvestment in the existing community</i> ● <i>Mixture of land uses</i> ● <i>Mix of residential densities and housing types</i> ● <i>Providing a minimum of 15 percent affordable housing</i> ● <i>Location along or near corridors, downtown, and transit nodes</i> ● <i>Transit, pedestrian, and bicycle circulation given high priority</i> <p><i>Teal Club Specific Plan:</i></p> <ul style="list-style-type: none"> ● <i>Location. Teal Club Road, Patterson Road, Doris Avenue, and Ventura Road.</i> ● <i>Land Use. Transit oriented residential with supporting mixed use, schools, parks, and neighborhood commercial services.</i> ● <i>Overview. The intent of this urban village is to encourage neotraditional town planning compatible with surrounding uses and the Oxnard Airport with a focus on sustainability by using green building and planning principles, provision of adequate public and semi-public uses, transit-oriented development, and an identity creating entry component facing Ventura Road. A central focus of this development will be in the provision of balanced community with jobs, school, recreation, shopping, and affordable and market-rate housing.</i> 	<p><u>Level I - Consistent.</u> The proposed TCSP would be consistent with the 2030 General Plan’s Urban Village policy, as it is one of the areas specifically defined as an Urban Village. The TCSP would provide a mix of land uses including but not limited to commercial, retail, business research, residential, public/semipublic uses, and open space.</p> <p>The TCSP envisions development of up to 990 residential dwelling units in a variety of densities and product types including both market-rate and affordable housing (15% affordable). In addition to single-family residential units, the TCSP includes single-family courtyard homes, single-family townhomes and multi-family condominiums and apartments (Section 2.0, <i>Project Description</i>).</p> <p>The TCSP would be located within 2.5 miles of Highway 101, a major transportation route and would provide access to other public transportation options, including Gold Coast Transit buses.</p> <p>The Urban Village would be oriented around a public plaza, and would be within walking distance of residential units and readily accessible to bus pull-out locations on southbound and northbound lanes of Ventura Road which would be built as part of the project. The planned bus stops would serve the project area and would help provide public transit options. Leasing preferences and incentives may be required so that the Urban Village provides a mix of uses that reduce vehicle trips by residents (Section 2.0, <i>Project Description</i>).</p>
<p><i>CD-7.5 Pedestrian and Transit Scale. Design urban village areas to be pedestrian-oriented and transit accessible, incorporating block patterns, walking routes and edges, social orientation of buildings, and streetscapes to provide ease of walking and safety.</i></p>	<p><u>Level I - Consistent.</u> The urban village would be oriented around a public plaza, and would be within walking distance of residential units and readily accessible to bus pull-out locations on southbound and northbound lanes of Ventura Road, which would be built as part of the project. The planned bus stops would serve the project area and would help provide public transit options. One of the project objectives is to create an integrated vehicular, pedestrian and bicycle circulation system that connects residential, industrial, commercial and institutional uses within the project area. The proposed project would involve pedestrian, bicycle, and transit improvements as discussed in Section 2.0, <i>Project Description</i>, and shown in Figure 2-4.</p>
<p><i>CD-7.6 Connectivity. Provide connectivity to other activity nodes in the form of roadways, transit connections, and bicycle and pedestrian linkages that encourages non-vehicular travel modes. Urban villages should be considered major transit transfer points and have amenities oriented towards transit users.</i></p>	



General Plan Policy	Discussion
<p><i>CD-7.7 Urban Village Streetscapes and Identification. Include streetscape and signage programs in roadway improvements that provide each area a unique identification and enhance the functionality and beauty of entry corridors. Ensure that planned roadway improvements do not conflict with other policies that encourage pedestrian activities and circulation.</i></p>	<p><u>Level II - Consistent.</u> Development under the TCSP, when proposed, would be required to adhere to streetscape and identification programs as defined by the 2030 General Plan.</p>
<p><i>CD-7.8 Road Design. Reflect the residential and commercial activities of the urban village area by using appropriate roadway widths for road and streetscape design.</i></p>	<p><u>Level II - Consistent.</u> Development under the Specific Plan, when proposed, would be required to adhere to road and streetscape design as defined by the 2030 General Plan.</p>
<p><i>CD-7.9 Infrastructure Compatibility. Ensure new development within each urban village complies with the City's adopted infrastructure master plans and provides fair share contributions towards existing and future improvements necessary to serve the development.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.14, <i>Utilities and Service Systems</i>, developers of the proposed project would pay fees for the necessary wastewater infrastructure, project developers would design on-site water systems to serve the development, and the proposed project would not significantly impact water or solid waste infrastructure.</p>
<p><i>CD-7.11 Urban Village Open Space Areas/Parks. Park sizes and locations shall follow City standards and be within walking distance of a majority of the population.</i></p>	<p><u>Level II - Consistent.</u> The TCSP would include 17.8 acres of parks and open space, most of which would be located east of Patterson Road. The 7.4-acre park adjacent to Patterson Road would be within walking distance of all TCSP residents, as well as existing residential neighborhoods north and east of the project area.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> The proposed TCSP does not involve collocation of schools and parks; however, the 7.4-acre City Community Park proposed to be located alongside Patterson Road would be near the proposed OSD school site adjacent to the TCSP area.</p>
<p><i>CD-7.13 Urban Village Trail and Open Space 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.</i></p>	<p><u>Level II - Consistent.</u> The TCSP would include open space areas, including greenbelts along Beverly Drive and Street C. The area adjacent to Patterson Road, nearest to the agricultural uses, would be developed as a 7.4 acre park area, which would be accessible to other neighborhoods.</p>
<p><i>CD 8.1. Limiting Development. Continue to limit development to those areas that can be served by existing or planned utilities, transportation, and service systems.</i></p>	<p><u>Level II - Consistent.</u> See Section 4.14, <i>Utilities and Service Systems</i>. The proposed project is at the edge of the existing service area. It would involve development in an area that, with the mitigation proposed, can be served by existing or planned service systems. Since service does not exist currently, the project is potentially consistent.</p>
<p><i>CD 8.2. Services. Continue to ensure that public services and facilities are in place at the time of need or prior to the time new development occurs in order to avoid overloading existing urban service systems.</i></p>	
<p><i>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.</i></p>	<p><u>Level I - Consistent.</u> See Section 4.3, <i>Air Quality</i> for mitigation measures including energy efficiency design elements and construction requirements that would reduce impacts to air quality to a less than significant level. See Section 4.10, <i>Noise</i>, which includes mitigation measures and concludes that impacts related to noise would be less than significant. See Section 4.13, <i>Transportation and Traffic</i> for mitigation measures related to intersections that would ensure that impacts related to traffic would be less than significant. Other mitigation measures and impacts to environmental resources are discussed throughout this EIR and impacts would be reduced to the extent feasible.</p>



General Plan Policy	Discussion
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> When voters approved the city’s Save Open Space and Agricultural Resources (“SOAR”) initiative in 1998, the Teal Club site was specifically located inside the urban growth boundary (“CURB”) (Specific Plan, July 2013).</p>
<p><i>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 centers, parks, and infrastructure utility for support facilities.</i></p>	<p><u>Level I - Consistent.</u> Within the residential and commercial Planning Areas are a 6.5-acre community park, a 3.5-acre community park, and a 0.4-acre greenbelt combine for a total of 10.4 park acres. A 7.4-acre City Community Park would also be included in the TCSP to the east of Patterson Road. Public access to the Community Park would be available to all Oxnard residents via Patterson Road. In addition, the property at 1618 Doris Avenue in the TCSP area, which is also within ¼-mile of the proposed Oxnard School District school site</p>
<p><i>CD 8.9. Jobs/Housing Balance & Sustainable Communities Strategy (SB 375). Incorporate inter- and intra-city jobs/housing balance in the development of the regional and subregional Sustainable Communities Strategy (SB 375), Urban Village strategy and strategic plans, with the main intent to reduce single-occupancy work-related vehicular trips.</i></p>	<p><u>Level I - Consistent.</u> The TCSP would create 2,651 employment opportunities and 988 residential units within a transit-oriented development community. This would potentially reduce single-occupancy work-related vehicular trips by locating employment centers near residences.</p>
<p><i>CD 8.10. Timing of Large-Scale Development. Consider at an early stage the infrastructure investment needs of largescale developments in order to evaluate these needs as part of long-range water supply, conveyance, wastewater, and other relevant planning.</i></p>	<p><u>Level II - Potentially Consistent.</u> As described in Section 4.14, <i>Utilities and Service Systems</i>, existing water supply and solid waste conveyance systems would be able to serve the proposed project. Wastewater conveyance systems and an on-site recycled water system would be developed prior to occupancy.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> Given the limited extent to which the proposed project would affect scenic vistas (see Section 4.1, <i>Aesthetics</i>), the project would not have a significant adverse impact on scenic vistas.</p>
<p><i>CD 9.5. Unique Character Preservation. Ensure that new public and private investment maintains the unique coastal and agricultural character of the City.</i></p>	<p><u>Level II - Consistent.</u> As discussed in Section 4.2, <i>Agricultural Resources</i>, there was a significant and unmitigable impact associated with the conversion of agricultural land in the 2030 General Plan.</p>
<p><i>CD 10.1. Human-Scale Development. In the evaluation of development proposals, require urban development on a human scale, by emphasizing the pedestrian experience over the movement and storage of vehicles.</i></p>	<p><u>Level II - Consistent.</u> The TCSP would provide for the pedestrian experience. High, Medium, and Medium-High Density residential areas would orient to internal pathways and common areas with connection to the public walking network and to the urban village component.</p>
<p><i>CD 10.2. Neighborhood Themes. In the evaluation of development proposals, require neighborhood themes and principles of design, such as neotraditional town planning, which include central parks, schools, and community and commercial facilities, strong pedestrian orientation and de-emphasis of automobile related elements in new development projects.</i></p>	<p><u>Level II - Consistent.</u> The TCSP would emphasize the neighborhood themes. High, Medium, and Medium-High Density areas would orient to internal pathways and common areas with connection to the public walking network and to the urban village. Small parks or “greenbelts” would be located along major roadways within the TCSP area, including on Beverly Drive and Street C. The TCSP also includes a Community park.</p>



General Plan Policy	Discussion
<i>CD 11.3. Protect and Enhance Cultural Resources. Ensure that new public and private investment protects and enhances Oxnard’s existing cultural resources, traditional neighborhoods, and historic districts, to the extent feasible.</i>	<u>Level II - Consistent.</u> See Section 6.0, <i>Effects Found Not to be Significant</i> . There are no officially designated historic resources or known cultural resources on or adjacent to the project area.
Infrastructure and Community Services	
<i>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.</i>	<u>Level II - Consistent.</u> The proposed project includes payment of wastewater infrastructure fees to ensure that infrastructure would be in place to support development. The project also includes development of on-site water systems. The project area is on the edge of the existing service area for utilities and water and sewer lines are located near the project area. The applicant would also be required to fund development of an additional fire station, fire engine, and staff to provide fire/emergency services to the project area (Mitigation Measure PS-1). See Section 4.12, <i>Public Services</i> and Section 4.14, <i>Utilities and Service Systems</i> for a discussion of existing and proposed infrastructure.
Circulation	
<i>ICS 2.5. Mitigate Impacts on County Roads. Require new development to contribute to the enhancement of Ventura County-maintained roads based on an updated City/ County Memorandum of Understanding.</i>	<u>Level II - Consistent.</u> Intersection improvements and payment of standard traffic impact fees would be required as described in detail in Section 4.13, <i>Transportation and Traffic</i> .
<i>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. The City Council may allow an exception to level of service “D” in order to avoid impacting private homes and/or businesses, avoid adverse environmental impacts, or preserve or enhance aesthetic integrity.</i>	<u>Level II - Consistent.</u> The proposed project would include improvements to ensure that the project does not result in a level of service lower than “C.” See Section 4.13, <i>Transportation and Traffic</i> and mitigation measures T-1(a-h) and T-2(a-h) for specific details regarding the affected roadways and intersections.
<i>ICS 6.1. Transit Facilities for New Developments. Include transit facilities such as bus benches, shelters, pads or turnouts, where appropriate, in new development improvement plans.</i>	<u>Level I - Consistent.</u> Enhanced bus facilities on Ventura Road are included in the proposed plan. This would include multiple bus pull-out locations and bus shelters on southbound and northbound lanes of Ventura Road, which would be built as part of the project. The planned bus stops would serve the project area and would help provide public transit options.
<i>ICS 7.3. Travel Patterns. Promote compact, mixed use development patterns that compliment and encourage TDM programs, pedestrian and bicycle travel, and transit use.</i>	<u>Level II - Consistent.</u> A business/research park on the south side of the TCSP area would provide jobs within walking distance of area residents and the urban village would be oriented around a public plaza, and be within walking distance of residential units, as well as readily accessible to a new bus stop on Ventura Road. Fees would be paid to a TDM program, as described in Section 4.3, <i>Air Quality</i> Mitigation Measure AQ-2(a). The proposed density would be relatively compact for airport-adjacent areas.
<i>ICS 8.4. New Development Requires Bicycle Improvements. Where designated, require proposed developments to include bicycle paths and / or lanes in their plan and to clearly indicate possible bicycling hazards such as speed bumps and storm drain inlet grates in parking lots.</i>	<u>Level I - Consistent.</u> When submitted to the City, bike path design and alignment would be reviewed for appropriate safety elements. (See Figure 2-4 in Section 2.0, <i>Project Description</i> , for proposed pedestrian, bicycle, and transit improvements).



General Plan Policy	Discussion
<p><i>ICS 10.2. Oxnard Airport Compatible Land Use. Continue to ensure that the land use and zoning adjacent to Oxnard Airport is compatible in order to minimize potential noise and safety problems.</i></p>	<p><u>Level II - Potentially Consistent.</u> Only a small portion along the southern boundary in the western half of the TCSP area would be within the 60 dBA CNEL contour. This portion is proposed for a retention basin and business park uses, which would be compatible with potential noise from the Oxnard Airport. The light manufacturing uses that could be located on the nine parcels south of the TCSP area would be compatible with the noise levels associated with the Oxnard Airport (see Section 4.10, <i>Noise</i>). The proposed TCSP area and additional Annexation area are both within the Oxnard Airport’s traffic pattern zone (TPZ) and are subject to height restrictions. Development of the Specific Plan would place residential and commercial uses within 2,000 feet of the Oxnard Airport runway, potentially exposing people residing and working in the area to safety hazards. However, the probability of an accident occurring in the Plan Area is low. Further, the presence of nearby emergency landing areas would reduce accident hazards. Safety would be further ensured through mitigation measures HAZ-5(a-c). See Section 4.7, <i>Hazards and Hazardous Materials</i> for further discussion.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> TCSP buildout is proposed to be “water neutral” so that future water demand would not exceed the proposed transfer of water rights. To provide adequate potable water for the TCSP project, the existing agricultural water rights within the TCSP area would be transferred for municipal and industrial uses to the City of Oxnard. All TCSP development water needs for which recycled water use is appropriate would be connected to the City’s Ventura Road recycled water distribution pipeline. Recycled water would be used, at a minimum, for all landscape irrigation and other water conservation measures would be required by mitigation measures UTIL-3(c) and UTIL-3(d). See Section 4.14, <i>Utilities and Service Systems</i> for further discussion of water conveyance.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> Recycled water would be used, at a minimum, for all landscape irrigation, provided that the Utilities Department extends the recycled water facilities an extension of services to the project area is approved. Development within the TCSP area and the nine Annexed parcels would be required to adhere to Oxnard City Code (OCC) Chapter 22 <i>Water</i>, Section 22-243 <i>Compliance Requirements</i>, which requires that the landscape area of projects proposing commercial or industrial uses shall be designed without the use of turf and with 100% water wise plants. The landscape area of single-family residential, and multi-family residential projects shall be designed with no more than 40% of the landscaped area in turf or plants that are not water wise plants. Mitigation Measure AQ-2(d) requires implementation of passive energy conservation design techniques such as water conserving fixtures; other water conservation measures would be required by mitigation measure UTIL-3(c) for exterior water conservation.</p>
<p><i>ICS 11.12. Water for Irrigation. Require the use of non-potable water supplies for irrigation of landscape and agriculture, whenever available.</i></p>	<p><u>Level II - Potentially Consistent.</u> Recycled water would be used, at a minimum, for all landscape irrigation, provided that the Utilities Department extends the recycled water facilities to the project area.</p>



General Plan Policy	Discussion
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> The site would generally drain into new storm drains within Teal Club Road and Patterson Road, with additional storm water management provided by the proposed retention and on-site infiltration areas shown on the Land Use Plan (Figure 2-3) as “storm water treatment” areas. The precise configuration of the drainage system would be determined with the review and approval of each phase of the Specific Plan. All facilities within the TCSP area would be funded, permitted, and maintained by a Master Property Association, Community Facilities District, or other private entity as approved by the City. Implementation of the TSCP and buildout of the nine additional parcels would be required to comply with local, state and federal water quality and discharge requirements.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> The proposed project would include underground drainpipes and detention basins. The detention basins and infiltration areas would be located along the southern portion of the TCSP area, adjacent to Teal Club Road and the Business Research Park. The location would be visually unobtrusive.</p>
<p><i>ICS 13.4. Low Impact Development. Incorporate low impact development (LID) alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education.</i></p>	
<p>Environmental Resources</p>	
<p><i>ER 1.1. Protect Oxnard’s Natural and Cultural Resources. Protect the City’s natural resource areas, fish and wildlife habitat, scenic areas, open space 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.</i></p>	<p><u>Level II - Consistent.</u> No natural resource areas, habitat, historic resources, or other natural or cultural resources are located adjacent to the project area; therefore, no encroachment would occur. Nesting birds and/or monarch butterflies, as well as irrigation ditches that may be biological resources would be mitigated to the maximum extent feasible under mitigation measures as described in Section 4.4, <i>Biological Resources</i>.</p>
<p><i>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 Save Open-Space and Agricultural Resources Ordinance, and other programs or policies that may subsequently be adopted such as the SB 375 Sustainable Communities Strategy.</i></p>	<p><u>Level II - Consistent.</u> Implementation of the TCSP and Annexation of the nine parcels would not encroach upon agricultural areas to the west of the site. Interim agriculture buffers, as described in Mitigation Measure AG-2, would protect agricultural land on the project area during and after development of Phase 1 and before development of Phase 2. See Section 4.2, <i>Agricultural Resources</i> for a more detailed discussion.</p>
<p><i>ER 2.3. Promote Areas for Open Space. Reserve, preserve, and promote areas particularly suited for open space/recreational uses. Appropriate public access to these resources shall be preserved, enhanced, restored, and properly controlled.</i></p>	<p><u>Level I - Consistent.</u> Within the residential and commercial PA’s, a 6.5-acre community park, a 3.5-acre community park, and a 0.4 acre greenbelt combine for a total of 10.4 park acres. A 7.4-acre City Community Park would also be included in the TCSP to the east of Patterson Road. Public access to the Community Park would be available to all Oxnard residents via Patterson Road.</p>



General Plan Policy	Discussion
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> As discussed in Section 4.4, <i>Biological Resources</i>, there are no special-status species or known jurisdictional wetlands on the project area. Nesting birds and monarch butterflies would be protected through mitigation measures as described in Section 4.4, <i>Biological Resources</i>.</p>
<p><i>ER 3.5. Reduce Construction Silt and Sediment. Require that construction-related silt and sediment be minimized or prohibited to minimize temporary impacts on biological resources.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.8, <i>Hydrology and Water Quality</i>, compliance with NPDES Construction General Permit and the City of Oxnard ordinance requiring implementation of a Stormwater Pollution Control Plan would ensure that impacts on biological resources would be minimized.</p>
<p><i>ER 5.5. Abandoned Water Wells and Transfer of Water Rights. Require immediate capping of abandoned water wells at the time of abandonment and where appropriate and feasible, require and accept transference of water rights to the City.</i></p>	<p><u>Level II - Consistent.</u> One well currently exists on the project area. The existing agricultural water rights on the site would be transferred to the City as part of the proposed Annexation under applicable rules of the Fox Canyon Groundwater Management Agency.</p>
<p><i>ER 5.7. Minimizing Paved Surfaces. Require minimization and/or permeability of paved surfaces in new developments and replacement paving, where feasible.</i></p>	<p><u>Level II - Consistent.</u> The TCSP includes greenbelts and parks throughout the TCSP area, as well as detention basins located along the southern boundary of the TCSP area. Impermeable surfaces, including buildings, surface parking lots, and streets do not exceed requirements. See Section 4.8, <i>Hydrology and Water Quality</i> for more details.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> As discussed in Section 4.1, <i>Aesthetics</i> impacts to scenic views would be less than significant. Many of the views currently available from in and around the project area would continue to be accessible via internal streets and across the proposed parks and other open areas.</p>
<p><i>ER 6.6. New Development Private Open Space. Ensure that new development incorporates open space areas that provide community and neighborhood identity, private quality exterior private open space for each housing unit, and minimize conflicting land uses and noise generators.</i></p>	<p><u>Level II - Consistent.</u> The TCSP would include 17.8 acres of parks and open space, including a 7.4-acre City Community Park. The Community Park would be located between the TCSP and existing agricultural uses west of Patterson Road, which would minimize land use conflicts between urban uses and agricultural uses, including those related to air quality and noise.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> The TCSP would be an "Urban Village," emphasizing mixed land uses (single- and multi-family residential, retail, commercial, a business research park, and public/semi-public uses), pedestrian orientation and scale, transit accessibility, and neighborhood identity. As described in Section 4.1, <i>Aesthetics</i>, development within the TCSP would be subject to the <u>Oxnard Design Review Process & Guidelines, which include guidelines related to compatibility with existing development and reducing effects on sensitive visual resources.</u></p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> All development within the TCSP area and the nine Annexed parcels would be required to adhere to OCC Chapter 22 <i>Water</i>, Section 22-243 <i>Compliance Requirements</i>, which requires that the landscape area of projects proposing commercial or industrial uses shall be designed without the use of turf and with 100% water wise plants. The landscape area of single-family residential, multi-family residential projects shall be designed with no more than 40% of the landscaped area in turf or plants that are not water wise plants.</p>



General Plan Policy	Discussion
<p><i>ER 11.1. Archaeological Resource Surveys. Continue to require 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.</i></p>	<p><u>Level II - Consistent.</u> Ground disturbance that has occurred on the project area during past development and agricultural activities, as well as the lack of natural surface water features, reduces the likelihood that intact prehistoric cultural resources are present. However, mitigation measures CR-1(a) through CR-1(c) would minimize impacts to cultural resources by requiring monitoring during grading (all earth disturbing work within the vicinity of the find would be temporarily suspended or redirected until an archaeologist has evaluated) and procedures for discovery of unearthened cultural resources.</p>
<p><i>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.</i></p>	
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.2, <i>Agricultural Resources</i>, the conversion of agricultural land and its soils to non-agricultural uses would be a significant and unmitigable impact. Transfer of soils would result in potentially significant air quality and noise impacts related to excavation and hauling; in addition, no especially suited or needed receiver site has been identified. Buildout of the TCSP would be primarily at-grade and would not require substantial hauling of soil for disposal.</p>
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 2.0, <i>Project Description</i>, the TCSP would include buffer zones. A 7.4-acre public park would be located east of Patterson Road between the TCSP and agricultural uses. Interim buffers, as required by Mitigation Measure AG-2, would reduce conflicts between proposed residential uses and existing agricultural uses within the TCSP area.</p>
<p><i>ER 14.1. Incorporate Ventura County AQMP Mitigations. Incorporate construction and operation mitigation measures recommended or required by the current Ventura County Air Quality Management Plan (AQMP) when preparing CEQA reviews, as appropriate.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.3, <i>Air Quality</i>, mitigation measures consistent with this policy would be required for development within the TCSP and nine parcels proposed for Annexation.</p>
<p><i>ER 14.2. Transportation Demand Management (TDM). Employ best traffic management practices such as bus turnouts and traffic signal synchronization in order to reduce traffic-related air emissions impacts; require commercial developers to improve public transit service between residential and employment uses or shopping centers, bike lanes and protected bicycle parking areas, and other project features that would reduce the need for automobile trips related to the development; and require Transportation Management Associations (TMA) for projects that may have adverse air quality impacts related to mobile sources and contributions to off-site TDM funds to reduce residual impacts that cannot be mitigated on a project-specific basis.</i></p>	<p><u>Level II - Consistent.</u> The transit oriented development of the Urban Village would reduce air quality impacts by creating a community that would be accessed by pedestrians and would be in close proximity to alternative modes of transportation, such as buses. Enhanced bus facilities on Ventura Road are included in the proposed plan. This would include multiple bus pull-out locations and bus shelters on southbound and northbound lanes of Ventura Road, which would be built as part of the project. The planned bus stops would serve the project area and would help provide public transit options. See Section 4.3, <i>Air Quality</i> for Mitigation Measure AQ-2(a) which requires payment of fees to a TDM, as well as Section 4.13, <i>Transportation and Traffic</i>, which includes mitigation measures to improve intersection and roadway operations, reducing traffic and, therefore, emissions, at intersections.</p>



General Plan Policy	Discussion
<i>ER 14.3. Reducing Carbon Monoxide Exposure at Congested Intersections. Require mitigation measures that consider prohibiting the construction of residences or buildings lacking ventilation systems at congested intersections with the potential for excessive Carbon Monoxide “hot spot” exposure to sensitive receptors.</i>	<u>Level II - Consistent.</u> See Section 4.3, <i>Air Quality</i> for discussion of Carbon Monoxide “hot spot” risks. It was determined that future traffic combined with project traffic would not cause an exceedance of either the state or federal CO standards in 2020 or 2025 and project-related CO impacts would be less than significant.
<i>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.</i>	<u>Level II - Consistent.</u> See Section 4.3, <i>Air Quality</i> for requirements related to construction equipment, which ensure consistency with this policy.
<i>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).</i>	<u>Level II - Consistent.</u> See Section 4.3, <i>Air Quality</i> , which includes the requirement that the construction period be lengthened in Mitigation Measure AQ-1(b).
<i>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.</i>	<u>Level II - Consistent.</u> Mitigation measures consistent with this policy are included in the EIR in Section 4.3, <i>Air Quality</i> , mitigation measures AQ-1(a and b), which require dust control measures and construction equipment controls in accordance with VCAPCD requirements.
<i>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.</i>	<u>Level II - Consistent.</u> The Mitigation Monitoring Program includes specific details on how each mitigation measure is monitored, including those related to air emissions in compliance with CEQA Guidelines 7.15097.
<i>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.</i>	<u>Level II - Consistent.</u> See Section 4.3, <i>Air Quality</i> for discussion of the TCSP’s consistency with the VCAPCD Air Quality Assessment Guidelines. This EIR determined that operational emissions related to air quality would be significant and unmitigable based on these guidelines. All project developers would be required to use the guidelines for specific project development within the TCSP and nine parcels proposed for annexation.
Safety & Hazards	
<i>SH 1.1. Minimize Liquefaction Risk. Ensure that structures for human occupancy are only constructed or placed on a potential liquefaction site if the approved geological report shows that an acceptable hazard risk would be created and/or required mitigation measures are met.</i>	<u>Level II - Consistent.</u> Mitigation consistent with this policy is included in Section 4.5, <i>Geology and Soils</i> . Impact GEO-2 discusses liquefaction and Mitigation Measure GEO-2 would ensure that liquefaction risk would be minimized.
<i>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.</i>	<u>Level II - Consistent.</u> Mitigation consistent with this policy is included in Section 4.5, <i>Geology and Soils</i> . Mitigation Measure GEO-2 would ensure that subsidence risk would be minimized. Furthermore, the proposed project would be water neutral and would not require increased groundwater extraction to meet new water demands.



General Plan Policy	Discussion
<p><i>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.</i></p>	<p><u>Level II - Consistent.</u> As discussed in Section 4.5, <i>Geology and Soils</i>, mandatory compliance with applicable City of Oxnard and California Building Code requirements would mitigate seismic hazards to a less than significant level.</p>
<p><i>SH 5.4. Older Neighborhood Noise Mitigation. Develop a noise research and mitigation program for any area where traffic generated noise is significant and exceeds or is likely to exceed acceptable thresholds.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.10, <i>Noise</i>, impacts would be less than significant other than potential traffic noise impacts on future development within the proposed project area. Mitigation Measure N-4(a) would require future applicants for development within noise contours that would exceed City standards to retain a professional acoustical consultant to conduct an acoustical analysis.</p>
<p><i>SH 5.6. Compatibility with Oxnard Airport. Work with the Oxnard Airport in revising flight paths to minimize flyovers of residential areas, especially "touch and go" pattern flying at low altitude and at relatively high frequency.</i></p>	<p><u>Level II - Consistent.</u> Prior to making a decision on the proposed project, the City of Oxnard must refer the proposed project to the ALUC for review and comment. The ALUC would then review the project for consistency with the Airport Comprehensive Land Use Plan, including the policies and standards discussed above. The City must consider the comments of the ALUC prior to making a decision on adoption of the Specific Plan. Mitigation measures HAZ-5(a-c) would also ensure consistency with airport safety through requirements such as limiting the density of new land uses.</p>
<p><i>SH 6.1. Construction Noise Control. Provide best practices guidelines to developers for reducing potential noise impacts on surrounding land uses.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.10, <i>Noise</i>, impacts would be less than significant for surrounding land uses.</p>
<p><i>SH 6.2. Limiting Construction Activities. Continue to limit construction activities to the hours of 7 am to 7 pm, Monday through Saturday. No construction shall occur after hours, on Sundays, or national holidays without permission from the City.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.10, <i>Noise</i>, construction hours would be limited to 7am to 6pm Monday through Saturday.</p>
<p><i>SH 6.3. Buffering of Sensitive Receptors. Require noise buffering and/or other construction treatments in development located near major streets, highways, the airport, rail road tracks, or other significant noise sources as recommended by a noise analysis.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.10, <i>Noise</i>, impacts would be less than significant other than potential traffic noise impacts on future development within the proposed project area. Mitigation Measure N-4(a) would require future applicants for development within noise contours that would exceed City standards to retain a professional acoustical consultant to conduct an acoustical analysis.</p>
<p><i>SH 6.4. New Development Noise Compatibility. Require that proposed development projects not generate more noise than that classified as "satisfactory" based on CEQA Thresholds of significance on nearby property.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.10, <i>Noise</i>, impacts would be less than significant and the proposed project would not generate noise that exceeds significant thresholds on any nearby properties.</p>
<p><i>SH 6.5. Land Use Compatibility with Noise. Encourage non-noise sensitive land uses to locate in areas that are permanently committed to noise producing land uses, such as transportation corridors and industrial zones.</i></p>	<p><u>Level II - Consistent.</u> The additional nine parcels proposed for Annexation south of Teal Club Road are designated for Airport Compatible land uses, as shown on the Oxnard 2030 General Plan land use map and would be developed with light industrial uses, which are compatible with the noise levels generated by the Oxnard Airport. As discussed in Impact LU-3, industrial development would not impact nearby residences.</p>



General Plan Policy	Discussion
<p><i>SH 6.7. Peak Noise Evaluation Along Truck Routes. Evaluate peak event noise impacts for existing and proposed development along existing or proposed designated truck routes and require feasible and appropriate mitigations for project subject to discretionary review and approval.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.10, <i>Noise</i>, impacts would be less than significant other than potential traffic noise impacts on future development within the proposed project area. No truck routes are located adjacent to the project area. However, Mitigation Measure N-4(a) would require future applicants for development within noise contours that would exceed City standards to retain a professional acoustical consultant to conduct an acoustical analysis.</p>
<p><i>SH 6.9. Minimize Noise Exposure to Sensitive Receptors. Prohibit the development of new commercial, industrial, or other noise generating land uses adjacent to existing residential uses, and other sensitive noise receptors such as schools, child and daycare facilities, health care facilities, libraries, and churches if noise levels are expected to exceed 70 dBA.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.10, <i>Noise</i>, impacts would be less than significant other than potential traffic noise impacts on future development within the proposed project area. Mitigation Measure N-4(a) would require future applicants for development within noise contours that would exceed City standards to retain a professional acoustical consultant to conduct an acoustical analysis. No residential uses or other sensitive noise receptors such as schools, child and daycare facilities, health care facilities, libraries, or churches would be exposed to noise levels exceeding 70 dBA as a result of the proposed project.</p>
<p><i>SH 6.12. Development Near Railroads and Oxnard Airport. Require that new habitable structures be setback at least 85 feet from the nearest railroad track measured from the edge of the outermost railroad track, and only compatible new development is located within the Oxnard Airport 65 dBA CNEL contour.</i></p>	<p><u>Level II - Consistent.</u> Prior to making a final decision on the TCSP project, the City of Oxnard will refer it to the ALUC for a consistency review with the Airport Land Use Plan. Only a small portion of the TCSP area is within the 65 dBA CNEL contour and it would not contain residences or other incompatible land uses. The nine parcels proposed for Annexation consist of land that is within the 65 dBA CNEL contour; however, this land would be zoned for light industrial uses, which are compatible. Mitigation measures HAZ-5(a-c) would also ensure consistency with airport safety and noise regulations.</p>
<p><i>SH 6.13. Noise Acceptable for Open Windows and Patios. Continue to require noise analysis of proposed development projects as part of the environmental review process and the require mitigation measures to reduce noise impacts to acceptable levels within outside activity areas and within residential structures without relying on mechanical ventilation, if feasible.</i></p>	<p><u>Level II - Consistent.</u> As described in Section 4.10, <i>Noise</i>, impacts would be less than significant other than potential traffic noise impacts on future development within the proposed project area. Mitigation Measure N-4(a) would require future applicants for development within noise contours that would exceed City standards to retain a professional acoustical consultant to conduct an acoustical analysis.</p>
<p><i>SH-7.12 Hazardous Materials Studies. Ensure that the proponents of new development projects address hazardous materials concerns through the preparation of phase I or phase II hazardous materials studies for each identified site as part of the design phase for each project. Recommendations required to satisfy federal or State cleanup standards outlined in the studies will be implemented as part of the construction phase for each project.</i></p>	<p><u>Level II - Consistent.</u> Mitigation Measure HAZ-3 requires adherence to recommendations made in the Phase 1 for the TCSP and nine parcels proposed for Annexation. This would require removal and recompaction of soil, as well as continued monitoring and appropriate remediation of potentially contaminated soil.</p>



General Plan Policy	Discussion
<p><i>SH 9.1. Airport Land Use Compatibility Plans. Require development around the Oxnard and Camarillo Airports to be consistent with the safety policies and land use compatibility guidelines contained within the Ventura County Airport Land Use plan.</i></p>	<p><u>Level II - Consistent.</u> The additional nine parcels proposed for Annexation south of Teal Club Road are designated for Airport Compatible land uses, as shown on the Oxnard 2030 General Plan land use map. Upon Annexation, the additional nine parcels proposed for annexation south of Teal Club Road would be rezoned Light Manufacturing (M-1) by the City of Oxnard and would be compatible. Mitigation measures HAZ-5(a-c) would also ensure consistency with airport safety and noise regulations for the entire project area.</p>
<p><i>SH 9.2. Compliance with FAA Regulations. Ensure development within the airport approach and departure zones are in compliance with applicable Federal Aviation Administration regulations that address objects affecting navigable airspace.</i></p>	<p><u>Level II - Consistent.</u> The additional nine parcels proposed for Annexation south of Teal Club Road are designated for Airport Compatible land uses, as shown on the Oxnard 2030 General Plan land use map. Upon Annexation, the additional nine parcels proposed for annexation south of Teal Club Road would be rezoned Light Manufacturing (M-1) by the City of Oxnard. Development on the parcels would be reviewed to ensure compliance with the FAA regulations at the time such development is proposed. Mitigation measures HAZ-5(a-c) would also ensure consistency with airport safety and noise regulations for the entire project area through requirements including notification of the FAA.</p>
Housing	
<p><i>Housing Element Policy-2.2 Balanced Opportunities. Provide opportunities to the private and public sector for the production of housing that meets the needs of special needs-, extremely low-, very low-, low-, moderate, and above moderate-income housing to achieve a balanced community.</i></p>	<p><u>Level II - Consistent.</u> The TCSP envisions development of up to 990 residential dwelling units in a variety of densities and product types including both market-rate and affordable housing (15% affordable). In addition to single-family residential units, the TCSP includes single-family courtyard homes, single-family townhomes and multi-family condominiums and apartments (Section 2.0, <i>Project Description</i>).</p>

Airport Land Use Plan. The project area is within the planning area of the Oxnard Airport. The Ventura County ALUC has prepared an Airport Comprehensive Land Use Plan (CLUP) (2000) to “provide for the orderly growth of each public airport and the area surrounding the airport... [and] safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general” (California Public Utilities Code Section 21675). As shown on Exhibit 6B of the CLUP, the project area is within the airport’s Traffic Pattern Zone (TPZ) and partially within the Height Restriction Zone (HRZ). The CLUP includes the following policies related to surrounding land uses and exposure to airport noise and hazards:

- *Any structures proposed within the HRZ must remain below the Approach and Transitional Surface.*
- *For all conditionally acceptable land uses, the recording of a fair disclosure agreement and covenant shall be required.*
- *Any structures proposed within any part of the F.A.R. Part 77 Airspace Plan which require a variance, conditional use, or special use permit because they exceed the permitted height requirements of the zoning ordinance shall be reviewed by the ALUC if the height of the proposed structure would penetrate any F.A.R. Part 77 surface.*
- *If the FAA reviews the proposed structure and finds that the structure would represent a hazard to air navigation, the proposal shall be disapproved. The proposal shall also be disapproved if the FAA finds that the structure would require the raising of approach minimums at any military or public use airport in the County.*



- *If the Federal Aviation Administration (FAA) reviews the proposed structure and makes a finding of “no hazard,” the structure shall be permitted, provided that it shall be marked and lighted in accordance with the recommendations of the FAA.*

Noise Compatibility. As discussed in Section 4.10, *Noise*, the entire TCSP area is outside of the projected future 65 dBA CNEL airport noise contour, and all but a narrow strip of the proposed TCSP area is outside of the 60 dBA CNEL contour. The nine additional parcels proposed for Annexation and M-1 zoning are split between the 60, 65 and 70 dBA CNEL contours (Kimley-Horn & Associates, 2010). The CLUP sets forth noise compatibility standards (CLUP Section 6.1) for Ventura County airports. The proposed land use categories and their associated classifications in the CLUP for the noise contours into which they would fall are:

- *Residential outside of the 60 dBA CNEL contour – acceptable.*
- *Residential within the 60-65 dBA contour – conditionally acceptable, i.e., must meet the following criterion: new construction or development may be undertaken only after an analysis of noise reduction requirements and necessary noise insulation is included in the design.*
- *Industrial (includes light industrial and business park uses) and Commercial uses within the 60-70 dBA contours – acceptable.*

The California Building Code as adopted by the City of Oxnard (Ord. No. 2760, 2968) requires that interior noise levels are attenuated to 45 dBA or lower through construction techniques and materials. This existing regulation would ensure that “necessary noise insulation is included in the design” of new residential construction that would be facilitated by adoption of the proposed Specific Plan. Thus, the proposed project would be consistent with the noise compatibility guidelines of the CLUP.

Safety Compatibility. The CLUP sets forth safety compatibility standards (CLUP Section 6.2) for Ventura County airports. This includes classifying the compatibility of specific land uses in proximity to the airport as to whether they are acceptable, conditionally acceptable or unacceptable within identified safety zones. The proposed land use categories and their associated classifications in the CLUP are:

- *Residential – conditionally acceptable, i.e., must meet the following criteria: structural coverage may not exceed 25%, and an avigation easement and fair disclosure agreement and covenant must be recorded for the subject property.*
- *Industrial (includes light industrial and business park uses) and Commercial – conditionally acceptable, i.e., must meet the following criteria: structural coverage may not exceed 50%, with structures placed as far as practical from the runway on parcels immediately adjacent to airport property; and an avigation easement and fair disclosure agreement and covenant must be recorded for the subject property.*

As discussed in Section 4.10, *Noise* and Section 4.7, *Hazards and Hazardous Materials*, mitigation measures HAZ-5(a-c) would ensure that the criteria for residential and commercial/industrial uses are met. As discussed in Impact N-5, noise impacts associated with the airport would be less than significant.

Prior to making a decision on the proposed project, the City of Oxnard must refer the proposed project to the ALUC for review and comment. The ALUC would then review the project for



consistency with the Airport Comprehensive Land Use Plan, including the policies and standards discussed above. The City must consider the comments of the ALUC prior to making a decision on adoption of the Specific Plan and can vote to override the findings of an ALUC with a super majority (two-thirds). Neither the County of Ventura, the ALUC, nor the FAA has approval authority over the project; therefore, consistency findings and other decisions or recommendations from these agencies are limited in the context of whether the City of Oxnard ultimately approves, approves with conditions, or denies the proposed project.

The FAA also reviews projects proposed on or near airports for compliance with airspace obstruction-clearance criteria published in 14 CFR, Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace*, of the Federal Aviation Regulations (FARs). FAR Part 77 requires that a project be submitted to the FAA for review if it would penetrate a "notice surface" based on a slope of 100 feet horizontal to 1 foot vertical from the nearest point of the nearest runway. The notice surface simply establishes a threshold for FAA study; it does not suggest that an object that might penetrate it would be an obstruction. The application initiates an "obstruction evaluation" (OE) by FAA staff. The FAA's role in conducting an OE is solely to determine if a proposed structure might constitute an obstruction or, more seriously, a "hazard" to air navigation. Regardless of its findings, FAA cannot approve or prohibit construction; that responsibility is with the local jurisdiction in exercising its zoning powers.

The most distant structure from the airport runway in the TCSP area would be approximately 2,800 feet away. At this distance, a structure over 28 feet would penetrate the "notice surface." Because the nearest structures would be only about 750 feet from the runway edge, virtually all of them could penetrate the notice surface. Therefore, Part 77 does require that the developer submit the project to FAA for study. This can be done as a blanket application for the entire development rather than as individual applications for each building and Mitigation Measure HAZ-6(a) is required to ensure compliance with this regulation.

City of Oxnard Zoning Ordinance. The entire project area is currently zoned Agricultural Exclusive with a minimum lot size of 40 acres (AE-40) by the County of Ventura. Upon annexation, each Planning Area within the proposed TCSP area would be assigned a City zone to reflect the specific uses approved for the site. If the proposed annexation and Specific Plan were approved, the project would be consistent with the zoning regulations.

Upon annexation, the additional nine parcels proposed for Annexation south of Teal Club Road would be rezoned Light Manufacturing (M-1) by the City of Oxnard. The Annexation and application of the new zoning are not associated with any specific development project or proposal. This analysis assumes that buildout under the proposed new zoning would be consistent with the M-1 standards per standard City requirements and existing regulations.

Local Agency Formation Commission. In considering whether to approve or deny the proposed annexations to the City of Oxnard that are part of the proposed project, LAFCo must assess consistency of the Annexations with their adopted policies and standards. A discussion of the project's potential consistency with LAFCo policies is presented in Table 4.9-3.



**Table 4.9-3
 LAFCo Policy Consistency**

Policy	Discussion
General Policies	
<p><i>Urban development should occur, whenever and wherever practical, within incorporated cities which exist to provide a full range of municipal services and are responsible for urban land use planning.</i></p>	<p>The proposed TCSP area is adjacent to the City of Oxnard and fully within the City of Oxnard Sphere of Influence and CURB. Annexation to the City of Oxnard, Calleguas Municipal Water District (CMWD) and Metropolitan Water District (MWD) is proposed. LAFCo generally avoids creating unincorporated islands and attempts to eliminate existing unincorporated islands as a condition of approval for nearby Annexations; the project also includes nine parcels south of Teal Club Road to create one contiguous Annexation area and avoid creating unincorporated islands. The TCSP would provide planning policies for the entire Annexed area to help guide development in the area to be Annexed. As discussed in Section 4.12, <i>Public Services and Recreation</i>, and 4.14, <i>Utilities and Service Systems</i>, municipal services would be available to serve these contiguous areas.</p>
<p><i>The cities and the County should strive to produce general plans, ordinances and policies which will fulfill these guidelines.</i></p>	<p>Proposed adoption of the TCSP and pre-zoning of the additional nine parcels to be Annexed fulfills the goal of providing policies to guide urban planning in the area.</p>
Policies within Spheres of Influence	
<p><i>The following policies shall apply within City Spheres of Influence (Spheres of Influence are created by LAFCo, as required by State law, to identify the probable boundaries of cities and special districts, realizing that spheres may be amended from time to time as conditions warrant):</i></p>	
<ul style="list-style-type: none"> ● <i>Applicants for land use permits or entitlements for urban uses shall be encouraged to apply to the City to achieve their development goals and discouraged from applying to the County.</i> 	<p>In order for the development to be built and occupied, the project would first have to be Annexed into the City, and the TCSP approved by the City. Subsequent entitlements would be under the City's jurisdiction. If the Annexation is not approved, development in the TCSP area, or on the nine additional parcels under the proposed M-1 zoning, would not move forward as proposed.</p>
<ul style="list-style-type: none"> ● <i>The City is primarily responsible for local land use planning and for providing municipal services.</i> 	<p>The City would adopt the TCSP and the M-1 Zoning for the nine additional parcels. As discussed in Section 4.12, <i>Public Services and Recreation</i>, and 4.14, <i>Utilities and Service Systems</i>, municipal services would be available to serve these contiguous areas.</p>
<ul style="list-style-type: none"> ● <i>Prior to being developed for urban purposes or to receiving municipal services, land should be annexed to the City.</i> 	<p>Annexation to the City is proposed.</p>
<ul style="list-style-type: none"> ● <i>Annexation to the City is preferable to the formation of new or expansion of existing County service areas.</i> 	
<ul style="list-style-type: none"> ● <i>Land uses which are allowed by the County without annexation should be equal to or more restrictive than land uses allowed by the City.</i> 	
<ul style="list-style-type: none"> ● <i>Development standards and capital improvement requirements imposed by the County for new or expanding developments should not be less than those that would be imposed by the City.</i> 	



Policy	Discussion
Specific Policies	
<i>Any annexation to the City of Oxnard shall only be considered and approved if the subject territory is already within the Calleguas Municipal Water District, or is approved concurrently with an annexation to the Calleguas Municipal Water District, 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:</i>	
(a) <i>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.</i>	Annexation to the Calleguas Municipal Water District is proposed.
(b) <i>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.</i>	
(c) <i>Calleguas Municipal Water District requests that annexation not occur as the District cannot provide timely service to subject territory.</i>	
<i>Consistency with General and Specific Plans: 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:</i>	
(a) <i>For proposals by a city, the general plan of the city.</i>	Consistency with the City of Oxnard 2030 General Plan is discussed throughout this document and in Table 4.9-1 above. The project is consistent, or potentially consistent based on Specific Plan-level information, with the 2030 General Plan.
(b) <i>For proposals by a district, where the affected territory lies within an adopted sphere of influence of a city, the general plan of the city.</i>	Not applicable.
(c) <i>For proposals by a district, where the affected territory lies outside an adopted city sphere of influence, the Ventura County General Plan.</i>	Not applicable.
<i>LAFCo will not approve a proposal from a city that is in conflict with any Greenbelt Agreement unless exceptional 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.</i>	The Oxnard-Ventura Greenbelt begins on the west side of Patterson Road. The project area is not located within either of these greenbelts, but is adjacent to the Oxnard-Ventura Greenbelt.
<i>Factors Favorable To Approval:</i>	
(a) <i>The proposal would eliminate islands, corridors, or other distortion of existing boundaries.</i>	The proposed TCSP area is adjacent to the City of Oxnard and fully within the City of Oxnard Sphere of Influence and CURB. Although not an island, it is a "cut-out" shape in the City boundary that would be filled in to result in a more coherent City boundary in this location.
(b) <i>The affected territory is urban in character or urban development is imminent, requiring municipal or urban-type services.</i>	The proposed TCSP area is not urban in nature, but the TCSP area and the nine parcels proposed for annexation are surrounded on three sides by urban and airport development and within the Sphere and CURB.
(c) <i>The affected territory can be provided all urban services by the city or district as shown by the city's or district's service plans and the proposal would enhance the efficient provision of urban services.</i>	As discussed in Section 4.12, <i>Public Services and Recreation</i> , and 4.14, <i>Utilities and Service Systems</i> , municipal services would be available to serve these contiguous areas.



Policy	Discussion
(d) <i>The proposal is consistent with state law, adopted spheres of influence, applicable general and specific plans, and these policies.</i>	No conflicts with state law, adopted spheres of influence, applicable general and specific plans, or these policies has been identified.
(e) <i>The proposal is for the annexation of city or district owned property, used or to be used for public purposes.</i>	The project is for the Annexation of property currently used for agriculture, which would be privately owned but developed with some public uses, including a 7.4-acre City Community Park.
<i>Factors Unfavorable To Approval:</i>	
(a) <i>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.</i>	The TCSP area and nine parcels proposed for Annexation are adjacent to the City of Oxnard and would not distort any existing boundaries.
(b) <i>The proposal would result in a premature intrusion of urbanization into a predominantly agricultural or rural area.</i>	The TCSP area and land to the west of the site are currently used for agriculture. However, the project area is surrounded on three sides by urban development. The nine parcels proposed for Annexation are located between areas that are currently developed with urban commercial, industrial, and residential uses. The conversion would not be premature as the project area is within the CURB and the City's Sphere of Influence and identified for development in the City's 2030 General Plan.
(c) <i>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.</i>	As described in Table 4.9-1, the proposed project is generally consistent with the City of Oxnard General Plan (2030). The TCSP is included in the 2030 General Plan as an Urban Village. See Table 4.9-3, below, for consistency with SCAG plans, policies, and goals. The site is not protected by any local policies or ordinances pertaining to biological resources or by an adopted conservation plan.
(d) <i>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.</i>	No topographical or natural boundaries exist that would cause the extension of public services to be financially infeasible. The TCSP area and nine parcels proposed for Annexation are adjacent to existing urban development. See Section 4.14, <i>Utilities and Service Systems</i> for further discussion of the availability of services.
(e) <i>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.</i>	The area proposed for Annexation is not isolated, the terrain is similar to the terrain of the surrounding urban areas, and no other economic or social reasons exist that would cause the project to be outside of the public interest.
(f) <i>The proposal appears to be motivated by inter-agency rivalry or other motives not in the public interest.</i>	The project is not motivated by inter-agency rivalry or other motives not in the public interest.
(g) <i>The proposed boundaries do not include logical service areas or are otherwise improperly drawn.</i>	The proposed Annexation is adjacent to the City of Oxnard and urban development and is a logical extension of the city limits.
(h) <i>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.</i>	The project area is not within a 100-year flood hazard area. Further, the site is not at risk from inundation but seiche, tsunami, or mudflow. The Plan Area and the additional Annexation area are not located within wildfire hazard areas as identified in the Ventura County General Plan Hazards and Safety Element (2020). The site is not in any hazardous area designated by federal, state or local public agencies. See Section 4.7, <i>Hazards and Hazardous Materials</i> for further discussion.



Policy	Discussion
(i) <i>The proposal will result in an unacceptable significant adverse impact(s) to the environment as determined by the Commission.</i>	This EIR identifies significant impacts related to agriculture and operational emissions of air pollutants. Whether these impacts are unacceptable or not is a matter to be decided by the City and LAFCo in making their decisions on the project.
<i>LAFCo Favors Applications with Boundaries that do the Following:</i>	
(a) <i>Create logical boundaries that coincide with existing and planned service areas and, where possible, eliminate previously existing islands.</i>	The project area as a whole would be within City service areas. Although the area is not an “island” that is surrounded by City service areas on all sides, it is a “cut-out” shape in the City boundary that would be filled in to result in a more coherent City boundary in this location.
(b) <i>Follow natural and man-made features, such as ridge lines drainage areas, watercourses, and edges of right-of-way, 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.</i>	The generally level project area follows the edges of right-of-way along North Ventura Road, Doris Avenue, and North Patterson Road, as well as the boundaries of the Oxnard Airport to the south. The parcels included in the project area allow for ease of mapping lines of assessment.
(c) <i>Include adjacent urbanized areas which are receiving or which may require urban services such as public water and/or sewer services.</i>	The proposed Annexation area is adjacent to the City of Oxnard and urban development that is served by City water and sewer services.
<i>LAFCo Discourages Applications with Boundaries that:</i>	
(a) <i>Split neighborhoods or divide an existing identifiable community, commercial district, or other area having a social and economic identity.</i>	The proposed project would not divide any existing neighborhood or communities, or other areas having a social or economic identity. The Annexation would be adjacent to existing urban areas on the south, north and east of the project area.
(b) <i>Create areas where it is difficult to provide services.</i>	The proposed project is adjacent to urban areas that are already provided with services; no such difficulty would occur.
(c) <i>Create boundaries which result in islands, peninsulas, flags, “pinpoint contiguity,” “cherry stems,” or cause, or further, the distortion of existing boundaries.</i>	The TCSP area and nine parcels proposed for annexation are adjacent to the City of Oxnard and have been proposed such that they would not distort any existing boundaries.
(d) <i>Are drawn for the primary purpose of encompassing revenue-producing territories.</i>	Revenue production for the City is not the primary purpose of the proposed annexation.
<i>Findings and Criteria for Prime Agricultural and Open Space Land Conversion: LAFCo will approve a proposal for a change of organization or reorganization which is likely to result in the conversion of prime agricultural or 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:</i>	
(a) <i>The territory involved is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development.</i>	The TCSP area and nine parcels that are proposed for Annexation are contiguous to lands that are developed with urban uses. The southern boundary is adjacent to the Oxnard Airport and other urban uses.
(b) <i>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.</i>	The TCSP area is designated in the City of Oxnard General Plan (2030) for development that would occur in two phases over a number of years, expecting to commence Phase I within five years of the TCSP.



Policy	Discussion
(c) <i>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.</i>	There are limited vacant, non-prime areas of comparable size, configuration and location within the City of Oxnard that are similarly identified for development in the City's 2030 General Plan at a scale of the proposed plan.
(d) <i>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.</i>	The project area is not on a site subject to voter approval. It is within the Oxnard CURB and designated for urban uses in the City's 2030 General Plan.
(e) <i>The proposal will have no significant adverse effects on the physical and economic integrity of other prime agricultural or open space lands.</i>	See Section 4.2, <i>Agricultural Resources</i> for a complete discussion of the project's effects on agricultural land. Impacts to nearby agricultural uses were determined to be significant but mitigable and Mitigation Measure AG-2, which required agricultural buffers, would ensure that significant adverse effects would not occur.
<i>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 boundaries of the agency unless the applicable jurisdiction has prepared a detailed alternative site analysis which at a minimum includes:</i>	
(a) <i>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.</i>	The TCSP contains approximately 149.72 acres of farmland of statewide importance. Development under the proposed Specific Plan would involve permanently removing 149.72 acres of land, identified as farmland of statewide importance, from agricultural production, a significant and unavoidable impact. The 2030 General Plan Program EIR, incorporated by reference, included the conversion of the TCSP to urban use and made the same significant impact finding. A Statement of Overriding Considerations was adopted with the 2030 General Plan that includes the TCSP area. The location selected for the TCSP was so chosen because it can emphasize transportation oriented development, a mixed-use community, and a jobs/housing balance. The proposed site is the proper size and location for the project objectives, as laid out in the 2030 General Plan. As discussed in Section 7.0, <i>Alternatives</i> , there are no potential alternative project sites in the local vicinity that are similar in acreage and could achieve the project objectives. The City's 2030 General Plan evaluated land within the City of Oxnard and determined that the project area was suited for the proposed uses. Other programs and policies of the General Plan address re-use and redevelopment of areas already within the City. As described in Section 4.2, <i>Agricultural Resources</i> , Mitigation Measure AG-1 includes options for agricultural conservation that would either require the applicant to record permanent agricultural conservation easements in order to help avert the future regional loss of agricultural lands or provide an in-lieu fee to contribute to the provision of farmworker housing.
(b) <i>An evaluation of the re-use and redevelopment potential of developed areas within the boundaries of the jurisdiction for the same or similar uses.</i>	
(c) <i>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 open space lands are necessary for the planned, orderly, and efficient development of the jurisdiction.</i>	
<i>Impacts on adjoining prime agricultural or open space lands: In making the determination whether conversion will adversely impact adjoining prime agricultural or open space lands, the Commission will consider the following factors:</i>	
(a) <i>The prime agricultural and open space significance of the territory and adjacent areas relative to other agricultural and open space lands in the region.</i>	Please see the specific consistency discussions above, in addition to the analysis and conclusions of the EIR, for discussions of these topics. Agricultural resources on the site and the project's impacts on those resources, land uses



Policy	Discussion
<i>(b) The economic viability of the prime agricultural lands to be converted.</i>	surrounding the project area, as well as the configuration and topography of the project area, 2030 General Plan consistency, and municipal services and utilities are addressed in those discussions.
<i>(c) The health and well being of any urban residents adjacent to the prime agricultural lands to be converted.</i>	
<i>(d) The use of the territory and the adjacent areas.</i>	
<i>(e) Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of prime agricultural or open space land outside of the agency's sphere of influence, or will be extended through prime agricultural or open space lands outside the agency's sphere of influence.</i>	
<i>(f) Whether natural or man-made barriers serve to buffer prime agricultural or open space lands outside of the agency's sphere of influence from the effects of the proposal.</i>	
<i>(g) 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 open space.</i>	
<i>(h) Comments and recommendations by the Ventura County Agricultural Commissioner.</i>	

Southern California Association of Governments. The TCSP area is located within the area served by the Southern California Association of Governments (SCAG), which includes Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial Counties. The TCSP area is located within the Ventura Council of Governments Subregion, which includes the Cities of Agoura Hills, Camarillo, Fillmore Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley, Thousand Oaks, and Westlake Village, as well as the County of Ventura.

SCAG's Regional Comprehensive Plan and Guide (RCPG) is the agency's primary policy document for coordination of regional planning efforts and compliance with federal air and water quality laws. The RCPG includes a set of broad goals for the region and identifies strategies designed to guide local decision-making. SCAG's Regional Transportation Plan (RTP), and Compass Growth Visioning document also contain goals, policies and principals applicable to the proposed Oxnard Village Specific Plan. Table 4.9-4 contains a discussion of the proposed project's consistency with selected applicable goals, objectives and policies of these SCAG plans and documents.



**Table 4.9-4
 Consistency with SCAG Goals, Policies and Principles**

Regional Comprehensive Plan and Guide	
Plan Goal or Policy	Discussion
<p><i>Growth Management Policy 3.05. Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.</i></p> <p><i>Growth Management Policy 3.09. Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.</i></p>	<p>Development under the proposed TCSP and of the nine parcels proposed for development would connect to existing utility lines and roadways in the immediate vicinity. Any updates of existing utility lines that may need to be made to accommodate projects within the area would be the responsibility of the project developer(s). See Section 4.14, <i>Utilities and Service Systems</i>, for more details.</p>
<p><i>Growth Management Policy 3.12. Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.</i></p> <p><i>Growth Management Policy 3.14. Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.</i></p> <p><i>Growth Management Policy 3.15. Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.</i></p> <p><i>Growth Management Policy 3.16. Encourage developments in and around activity centers, transportation corridors, under-utilized infrastructure systems and areas needing recycling and redevelopment</i></p>	<p>The TCSP generally reflects urban land uses, as described in the City's 2030 General Plan, that emphasizes residential development with supporting mixed uses and transit access to encourage alternate modes of transportation. Commercial and retail uses, business parks, and other frequently traveled-to uses would be located such that residents could travel via alternate modes of transportation. Bus stops and associated amenities are located within walking distance of all of the aforementioned uses; see Section 4.13, <i>Transportation and Traffic</i> for further details. Enhanced bus facilities on Ventura Road are included in the proposed plan. This would include multiple bus pull-out locations and bus shelters on southbound and northbound lanes of Ventura Road, which would be built as part of the project. The planned bus stops would serve the project area and would help provide public transit options. The TCSP area is located within three miles of U.S. 101, State Route 1, and the Union Pacific railroad tracks. The project area is near to major transportation corridors including U.S. 101 and State Route 1, as well as Ventura Road, Fifth Street and Victoria Avenue.</p>
<p><i>Growth Management Policy 3.20. Vital resources as wetlands, groundwater recharge areas, woodlands, productions lands, and land containing unique and endangered plants and animals should be protected.</i></p> <p><i>Open Space and Conservation Core Action: Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.</i></p>	<p>The project area does not support any sensitive habitats or riparian habitat, and is not considered to be critical for regional wildlife movement or migration, or as a native wildlife nursery. The site is surrounded on three sides by urban development and airport uses. See Section 4.4, <i>Biological Resources</i>, for further discussion and mitigation measures that would ensure protection for nesting birds, monarch butterflies, and irrigation ditches that may be present on the project area.</p>



Plan Goal or Policy	Discussion
<p><i>Growth Management Policy 3.23. Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.</i></p>	<p>Mitigation measures are included in Section 4.4, <i>Biological Resources</i>, Section 4.5, <i>Geology and Soils</i> and Section 4.10, <i>Noise</i> to address potential impacts to biological resources, seismic hazards, and noise.</p>
<p><i>Growth Management Policy 3.24. Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.</i></p>	<p>The TCSP includes 990 residential units and would increase the number of households on site and citywide. Up to 148 (15%) affordable housing units are incorporated into the project.</p>
Regional Transportation Plan	
<p><i>Regional Transportation Plan Goal: Maximize mobility and accessibility for all people and goods in the region.</i></p> <p><i>Regional Transportation Plan Goal: Encourage land use and growth patterns that complement our transportation investments.</i></p>	<p>The project is located within three miles of major transportation corridors including the Union Pacific railroad tracks, U.S. 101 and State Route 1.</p>
Compass Growth Visioning	
<p><i>Growth Visioning Principle 1: Improve mobility for all residents</i></p> <ul style="list-style-type: none"> ● <i>Encourage transportation investments and land use decisions that are mutually supportive.</i> ● <i>Locate new housing near existing jobs and new jobs near existing housing</i> ● <i>Encourage transit-oriented development</i> ● <i>Promote a variety of travel choices</i> 	<p>The project is located near major transportation corridors including the Union Pacific railroad tracks, U.S. 101 and State Route 1. The project is within five miles of (approximately 15 minutes driving time) the Esplanade Mall, Riverpark Town Center, and Oxnard Financial Plaza, which are existing job centers. Commercial and business research park components are also proposed to be located near existing residential uses to the north and east of the TCSP area, as well as within close proximity to the residential uses proposed as part of the Specific Plan. Enhanced bus facilities on Ventura Road are included in the proposed plan. This would include multiple bus pull-out locations and bus shelters on southbound and northbound lanes of Ventura Road, which would be built as part of the project. The planned bus stops would serve the project area and would help provide public transit options. The project is also located within the vicinity of existing bus stops. Additional transportation amenities and options are also part of the project, as discussed in Section 4.13 <i>Transportation and Traffic</i>. The project includes dedicated pedestrian paths and bicycle paths (see Figure 2-4 in Section 2.0, <i>Project Description</i>) and would emphasize transit oriented residential development with supporting mixed uses to encourage alternate modes of transportation.</p>



Plan Goal or Policy	Discussion
<p><i>Growth Visioning Principle 2: Foster livability in all communities</i></p> <ul style="list-style-type: none"> ● <i>Promote infill development and redevelopment to revitalize existing communities.</i> ● <i>Promote developments, which provide a mix of uses.</i> ● <i>Promote “people scaled,” walkable communities.</i> ● <i>Support the preservation of stable, single family neighborhoods.</i> 	<p>The TCSP and nine parcels proposed for Annexation are adjacent to an urban area. The TCSP includes a mix of uses (commercial, business research park, and residential) and emphasizes walkability. The proposed Specific Plan includes dedicated pedestrian paths and bicycle paths (see Figure 2-4 in Section 2.0, <i>Project Description</i>).</p>
<p><i>Growth Visioning Principle 3: Enable prosperity for all people</i></p> <ul style="list-style-type: none"> ● <i>Provide in each community, a variety of housing types to meet the housing needs of all income levels.</i> ● <i>Support educational opportunities that promote balanced growth.</i> ● <i>Ensure environmental justice regardless of race, ethnicity or income class.</i> ● <i>Support local and state fiscal policies that encourage balanced growth</i> ● <i>Encourage civic engagement</i> 	<p>The TCSP includes a mix of housing types including single and multi-family residential, and would include a range of purchase prices and rent levels. The TCSP includes 990 residential units and up to 148 affordable housing units.</p>
<p><i>Growth Visioning Principle 4: Promote sustainability for future generations</i></p> <ul style="list-style-type: none"> ● <i>Preserve rural, agricultural, recreational and environmentally sensitive areas.</i> ● <i>Focus development in urban centers and existing cities.</i> ● <i>Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste</i> ● <i>Utilize “green” development techniques.</i> 	<p>In general, the project is consistent with these policies, as it would involve Annexation of prime agricultural land at the City’s outside boundary and convert it to urban uses. This planning decision was made when the City adopted the 2030 General Plan, and was analyzed in an EIR herein incorporated by reference. In addition, the Urban Village planning approach provides opportunities for reduction of vehicle trips through enhanced transit access, bicycle and pedestrian circulation, and locating jobs near housing, which reflect some “green” development concepts.</p>

Conclusion. The project is consistent, or potentially consistent, with goals, policies and objectives of the 2030 General Plan and other policy documents, with inclusion of the mitigation measures described throughout this EIR and in the tables above.

Mitigation Measures. Mitigation measures contained in Sections 4.1, *Aesthetics*, 4.2, *Agricultural Resources*, 4.3, *Air Quality*, 4.5, *Geology and Soils*, 4.7, *Hazards and Hazardous Materials*, 4.10, *Noise*, and 4.13, *Transportation and Traffic*.



Significance After Mitigation. Mitigation measures listed above would reduce environmental impacts to help achieve consistency with adopted goals and policies.

Impact LU-3 The proposed project would be generally consistent with land uses allowed under the airport land use plan for the Oxnard Airport; however, existing structures, trees and lighting on the nine parcels in the additional Annexation area constitute an obstruction to airport operations. This is considered a Class II, significant but mitigable, impact.

Development of the Specific Plan would place residential and commercial uses within 2,000 feet of the Oxnard Airport runway. An aircraft hazard and land use risk assessment was conducted by Heliplanners, Inc. in 2012. This report assessed potential conflicts regarding the height of the proposed structures and development within safety zones. The following analysis is based on Heliplanners report and the Airport Land Use Comprehensive Land Use Plan for Ventura County (CLUP).

TCSP Area

Safety Zones: The TCSP area is within the traffic pattern zone of the Oxnard Airport (see Figure 4.7-1). The CLUP contains a list of acceptable, conditionally acceptable, and unacceptable land uses within each safety zone category. The TCSP includes development of single-family residences, multi-family residences, commercial uses, and a park. Parks are listed as acceptable uses in the TPZ. Single-family residences and multi-family residences are listed as conditionally acceptable uses, provided the maximum structural coverage of the land is no greater than 25%. Commercial uses are listed as conditionally acceptable uses, provided the maximum structural coverage does not exceed 50%. Heliplanners estimated that structural coverage in the TCSP area would be less than 20%, in compliance with FAA standards. Nonetheless, Mitigation Measure LU-3(b) is required to ensure that development in the TCSP area does not exceed FAA maximum structural coverage standards.

Height Restricted Zone: The TCSP area underlies the horizontal and transitional surfaces for the purposes of airport land use planning. The horizontal surface is at 195 feet MSL and the transitional surface at the southern part of the TCSP area closest to the airport is approximately 95 feet MSL. The tallest proposed building in the TCSP area would be approximately 92 feet MSL. Therefore, no proposed structures would be a significant factor with regard to the horizontal or transitional surfaces. Therefore, the proposed structures in the TCSP area would not conflict with the CLUP height-restricted zone.

Additional Annexation Area

Safety Zones: The Annexation area is within the TPZ. This area is designated for Airport Compatible uses according to the Oxnard 2030 General Plan land use map. The General Plan states that development in land designated for Airport Compatible uses would include low intensity commercial and industrial uses which are compatible with airport operations and activities in that they do not pose unreasonable hazards to aircraft operations. According to the CLUP, industrial and commercial uses in the TPZ are considered conditionally acceptable uses, provided that the maximum structural coverage does not exceed 50%. Although the General



Plan does not list residential uses as Airport Compatible uses, the existing residential uses in the additional Annexation are expected to be replaced with industrial and commercial uses under implementation of the proposed project. Nonetheless, Mitigation Measure LU-3(c) is required to ensure that future development in the additional annexation area does not exceed FAA structural coverage limits.

Height Restricted Zone: The southern edge of the additional Annexation area south of Teal Club Road is contiguous with the airport property line. Virtually any structure in this area would violate the 7:1 transitional surface and would constitute an “obstruction” under the criteria published in FAR Part 77. Further, trees, light standards, and power lines may also constitute an “obstruction.” In addition, future development, such as rooftops with high-glare solar panels, could result in glare visible to pilots or control tower staff. Therefore, the FAA must conduct an obstruction evaluation process for structures in this area to determine if they would be classified as a “hazard” to aviation. (See Mitigation Measure LU-3(c).)

The County of Ventura has requested an aviation easement be granted to the County. Typically, an aviation easement indicates that property owner(s) acknowledge that their properties are in an area subject to frequent aircraft overflights and that such overflights may result in noise, exhaust emissions and vibrations.

For structures in both the TCSP area and the additional Annexation area, the ALUC must review the proposed plan for consistency with the CLUP. If the Commission determines that the proposed action is inconsistent with the Plan, then the City has the option of overruling the Commission. That, however, can only occur if at least 2/3rds of the City Council (i.e., five members) vote to make specific findings that the proposed action is consistent with specific provisions of state law regarding the orderly development of airports, including preventing the creation of new noise and safety problems. Assuming review by the ALUC, compliance with County requirements, and adoption of the mitigation measures listed below, impacts would be less than significant. The report found that the proposed structures within the TCSP area would likely comply with all relevant criteria; however, structures on the nine parcels south of Teal Club Road may be considered obstructions or hazards to aviation. Regardless, because all structures would likely penetrate the FAA “notice surface,” the applicant would be required to initiate an Obstruction Evaluation through the FAA. Therefore, airport land use impacts would be significant and implementation of Mitigation Measure LU-3(a) is required. Impacts are Class II significant but mitigable.

Mitigation Measures. The following mitigation measures would be required to reduce conflicts with the applicable airport land use plan to a less than significant level.

- LU-3(a) FAA Notification.** For all development in the TCSP area and the additional Annexation area, the applicant shall notify the FAA via online application at FAA’s <https://oeaaa.faa.gov/oeaaa/external/portal.jsp> website. The FAA will determine if the structure is an “obstruction” or “hazard” to aviation, and if so, will make recommendations to reduce the obstruction or hazard. Prior to issuance of building permits, the applicant shall forward the FAA determination and



recommendations to the City of Oxnard and the City shall require that the applicant implement the recommendations provided by the FAA. Recommendations may include the use of red obstruction lighting on new construction.

- LU-3(b) Structural Coverage in the TCSP Area.** Structures within the TCSP area shall conform to the following guidelines:
- Residential uses: Maximum structural coverage of the residential planning areas must be no more than 25%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts
 - Commercial uses: Maximum structural coverage of the commercial planning areas must not exceed 50%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts.
- LU-3(c) Structural Coverage in the Additional Annexation Area.** Structures within the additional Annexation area shall conform to the following guidelines:
- Commercial and industrial uses: Maximum structural coverage must not exceed 50%. “Structural coverage” is defined as the percent of building footprint area to total land area, including streets and greenbelts. Where development is proposed immediately adjacent to the airport property, site plans shall be designed to locate structures as far as practical from the runway.
- LU-3(d) Avigation Easement.** Prior to issuance of final tract maps for development pursuant to the proposed Specific Plan or rezone of additional Annexation areas, the project applicant shall grant an avigation easement to the County of Ventura to record that the property owner(s) acknowledge that their properties are in an area subject to frequent aircraft overflights and that such overflights may result in noise, exhaust emissions and vibrations.

Significance After Mitigation. With implementation of the mitigation measures above, impacts related to airport operations would be reduced to less than significant levels.

c. Cumulative Impacts. Implementation of the proposed project, in conjunction with other related projects as part of buildout projected in the City’s 2030 General Plan, would cumulatively result in an overall intensification and recycling of land uses in Oxnard. Although some future projects may require General Plan Amendments, Zone Changes, Variances, Conditional Use Permits, Tract Map approvals, or other discretionary land use actions, the merits of each project would be considered on a case-by-case basis. These projects may not be approved if they are found inconsistent with the 2030 General Plan, or the General Plan in place at that time, or if the required findings of approval, which typically address land use



compatibility, cannot be made. Increased development densities from these projects would generate secondary cumulative impacts with respect to traffic, air quality, noise, and public services. These impacts are discussed in their respective sections of this EIR. Therefore, overall the proposed project would not substantially contribute to significant cumulative impacts.



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4.10 NOISE

This section addresses the impact of the noise generated by future development facilitated by the proposed TCSP and additional Annexations on nearby noise-sensitive land uses, as well as the effect of current and future noise levels on the proposed TCSP land uses.

4.10.1 Setting

a. Overview of Sound Measurement. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range and ambient noise levels greater than 65 dBA can interrupt conversations. Table 4.10-1 illustrates representative noise levels for the environment.

Noise levels typically attenuate (or drop off) at a rate of about 6 dBA per doubling of distance from point sources (such as industrial machinery). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed (approximately 30 years old or older) generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units and office buildings is generally 30 dBA or more (FTA, May 2006).

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period. Lmax is the highest RMS (root mean squared) sound pressure level within the measurement period, and Lmin is the lowest RMS sound pressure level within the measurement period.



The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (Ldn) or the Community Noise Equivalent Level (CNEL), which weight hourly Leqs over a 24-hour period. Ldn adds 10 dBA to actual noise levels occurring from 10 PM to 7 AM CNEL adds a 5 dBA penalty for noise occurring from 7 PM to 10 PM and a 10 dBA penalty for noise occurring from 10 PM to 7 AM. Noise levels described by Ldn and CNEL usually do not differ by more than 1 dBA.

**Table 4.10-1
 Representative Environmental Noise Levels**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 1,000 feet		
	—100—	
Gas Lawnmower at 3 feet		
	—90—	
		Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing

Source: Caltrans, 1998: <http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf>

b. Fundamentals of Groundborne Vibration. Vibrating objects in contact with the ground radiate energy through that medium. If a vibrating object is massive enough and/or close enough to the observer, its vibration is perceptible. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured in vibration decibels (VdB).



The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, which is the general threshold where minor damage can occur in fragile buildings (FTA, 2006).

The general human response to different levels of groundborne vibration velocity levels is described in Table 4.10-2.

**Table 4.10-2
 Human Response to Different Levels of Groundborne Vibration**

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.
90 VdB	Difficulty with tasks such as reading computer screens.

Source: FTA, 2006.

c. Sensitive Receptors. The City of Oxnard 2030 General Plan defines sensitive receptors as residential areas, hospitals, child and daycare facilities, convalescent homes and facilities, schools, and other similar land uses. These uses are considered sensitive because the presence of excessive noise may interrupt normal activities typically associated with their use. Noise sensitive land uses near the project area include residential neighborhoods approximately 75 feet north of the project area across Doris Avenue and 130 feet east of the project area across Ventura Road. The existing residences on the parcels south of Teal Club Road proposed for Annexation are also noise sensitive land uses. These residences are approximately 50 feet south of the TCSP area and 25 feet from potential future industrial development.

d. Regulatory Setting. Plans and policies that pertain to noise and its effect on the project area vicinity include the City of Oxnard 2030 General Plan Safety and Hazards Element and the City’s Noise Regulation Ordinance (Chapter 7, Article XI of the Oxnard CityCode).

The City’s Noise Ordinance identifies noise standards for various sources and includes specific noise restrictions for sources of noise within the City. Section 7-184 of the Oxnard CityCode designates sound zones for properties within the City based on their corresponding land use. Residential uses are designated as Sound Zone I; Commercial properties are designated as



Sound Zone II; Industrial areas are designated as Sound Zone III; and all property within the contours around a roadway, railroad track, or the Oxnard Airport (as identified in Figure IX-2 of the Noise Element of the 2020 General Plan) are designated as Sound Zone IV.

Table 4.10-3 shows the allowable noise levels and corresponding times of day for each of the identified sound zones.

**Table 4.10-3
 Exterior Noise Standards**

Sound Zone	Type of Land Use	Allowable Exterior Sound Level	
		7:00 AM to 10:00 PM	10:00 PM to 7:00 AM
I	Residential	55 dBA	50 dBA
II	Commercial	65 dBA	60 dBA
III	Industrial	70 dBA	70 dBA
IV	As identified in Figure IX-2 of the 2020 General Plan		

Source: City of Oxnard CityCode § 7-185.

Section 7-185 of the City Code specifies that no person at any location within the City shall create, maintain, cause or allow any sound on property which causes the sound level, when measured on any other property, to exceed:

- (1) *The allowable exterior sound level for a cumulative period of more than 30 minutes in any hour;*
- (2) *The allowable exterior sound level plus five dBA for a cumulative period of more than 15 minutes in any hour;*
- (3) *The allowable exterior sound level plus ten dBA for a cumulative period of more than five minutes in any hour;*
- (4) *The allowable exterior sound level plus 15 dBA for a cumulative period of more than one minute in any hour; or*
- (5) *The allowable exterior sound level plus 20 dBA for any period of time.*

In addition, with respect to residential uses, the interior noise level may not exceed 45 dBA between the hours of 10 PM and 7 AM and 50 dBA between 7 AM and 10 PM for a period of five or more minutes in any hour, as shown in Table 4.10-4. Further, the allowable interior level plus 5 dBA cannot be exceeded for more than one minute in an hour and the allowable interior level plus 10 dBA cannot be exceeded for any period of time (City Code Section 7-186).



**Table 4.10-4
 Residential Interior Noise Standards**

Sound Zone	Type of Land Use	Allowable Interior Sound Level	
		7:00 AM to 10:00 PM	10:00 PM to 7:00 AM
All	Residential	50 dBA	45 dBA

Source: City of Oxnard City Code § 7-186

e. Existing Noise Sources. The most common sources of noise in the project area vicinity are transportation sources, including traffic on surrounding roads and intermittent aircraft noise. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create sustained noise levels. Existing noise sources within the TCSP area are limited to agricultural operations, with intermittent noise derived from tractors and other similar agriculturally related equipment and operations. Existing noise sources within the additional Annexation includes noise typical of residential development.

The Oxnard Airport runway is approximately 750 feet south of the TCSP area and 225 feet south of the proposed additional Annexation area. The nine parcels south of Teal Club Road are within the 65 dBA CNEL noise contour for the Oxnard Airport (General Plan 2030 EIR).

On August 27, 2019, Rincon Consultants staff performed three 15-minute weekday noise measurements using an ANSI Type II integrating sound level meter.¹ The noise monitoring results are summarized on Table 4.10-5 and the various locations of the measurements are shown on Figure 4.10-1. These measurements reflect noise at various times ranging from 7:20 AM to 9:00 AM. These measurements reflect noise levels at peak traffic hours (typically 7 AM to 9 AM and 4 PM to 6 PM), which is generally when the highest levels of vehicular traffic occur and generate the highest average noise levels.

**Table 4.10-5
 Noise Measurement Results**

Measurement Number (as shown on Figure 4.10-1)	Measurement Location	Primary Noise Source	Approximate Distance to Roadway Centerline	Leq (dBA)	Lmax (dBA)
1	Teal Club Rd between Patterson Rd and Ventura Rd	Traffic/Airport	15 feet	72.1	86.3
2	Ventura Rd between Teal Club Road and Doris Ave	Traffic	35 feet	78.6	96.2
3	Doris Ave between Patterson Rd and Ventura Rd	Traffic	35 feet	67.5	85.0

Source: Rincon Consultants, Inc. Recorded during field visit using ANSI Type II Integrating sound level meter. See Appendix H for noise monitoring data sheets.

¹ Current ambient noise levels during the COVID-19 pandemic may be temporarily lower than measured as a result of reduced traffic and aircraft volumes; however, these noise measurements are representative of typical ambient noise levels in the vicinity of the project site. It is anticipated that traffic and aircraft volumes would return to pre-pandemic levels by implementation of Phase 1 of the proposed project. Therefore, the measurements remain appropriate for determining baseline noise conditions.



Figure 4.10-1 Noise Measurement Locations



Imagery provided by Microsoft Bing and its licensors © 2019.
 Project area boundary hand digitized from: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc. Additional data provided by County of Ventura 2018.

Fig 4.10-1 Noise Measurement Locations



4.10.2 Impact Analysis

a. Methodology and Thresholds of Significance. The following thresholds are based on the City of Oxnard's 2017 CEQA Guidelines. Impacts would also be potentially significant if the proposed project would:

- 1) *Generate or expose persons to noise levels exceeding standards established in the Oxnard 2030 General Plan or Noise Ordinance, or applicable standards of other agencies;*
- 2) *Generate or expose persons to excessive groundborne vibration or groundborne noise levels;*
- 3) *Generate a substantial temporary or period increase in ambient noise levels in the project vicinity above levels existing without the project;*
- 4) *Generate a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;*
- 5) *For a project located within an airport land use plan for Oxnard Airport or within two miles of Naval Base, Ventura County at Point Mugu, would the project expose people residing or working in the project area to excessive noise levels; or*
- 6) *Expose non-human species to excessive noise.*

Future development within the project area would generate noise during construction and operations. Impacts associated with exposure of non-human species to excessive noise are discussed in Section 4.4, *Biological Resources*. The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

Long-Term Operational Noise. Impacts to future development within the project area relating to operational project area activities, traffic noise, and aircraft noise would be considered significant if project-related activities create noise exceeding the City's noise standards as shown in Table 4.10-3 and 4.10-4 above.

Traffic Noise. Noise levels associated with existing and future traffic along area roadways and highways were calculated using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) based on data provided in the 2014 traffic report prepared for the proposed Specific Plan).² Cumulative conditions correspond to projected buildout of the City's General Plan, as discussed in Section 3.0, *Environmental Setting*. While information used for the traffic model was provided by the original 2014 Stantec-prepared traffic study for the proposed project, that study assumed 1,094 AM peak hour trips, 1,359 PM peak hour trips, and 13,794 total average daily trips. As shown in Section 4.13, *Transportation and Traffic*, the current proposed project would generate an estimated 892 AM peak hour trips (a 202 trip reduction compared to previous project), 998 PM peak hour trips (a 361 trip reduction) and 13,611 average

² Data in the 2014 traffic study remains representative of existing traffic conditions on area roadways. Traffic volumes have not significantly increased since preparation of this traffic study.



daily trips (a 183 trip reduction). Therefore, the modeling presented in this section includes a conservative analysis of traffic noise increases generated by the proposed project.

For traffic-related noise, impacts would be significant if project-generated traffic noise would result in exposure of sensitive receptors to an unacceptable increase in noise levels. Recommendations contained in the September 2018 *Transit Noise and Vibration Impact Assessment* report created by the Federal Transit Administration (FTA) were used to determine whether increases in traffic noise would be unacceptable.³ With these thresholds, the allowable noise exposure increase is reduced with increasing ambient existing noise exposure, such that higher ambient noise levels have a lower allowable noise exposure increase. Table 4.10-6 shows the significance thresholds for increases in traffic-related noise levels caused either by the project alone or by the project’s contribution to cumulative development.

Temporary Construction Noise and Vibration. Construction noise and groundborne vibration levels were estimated based estimates from the FTA’s *Transit Noise and Vibration Impact Assessment* (September 2018). Reference noise and vibration levels from that document were used to estimate noise levels at nearby sensitive receptor locations based on the distance between the construction site and receptors and a standard noise attenuation rate of 6 dBA per doubling of distance and vibration attenuation rate of approximately 6 VdB per doubling of distance. Construction noise and vibration level estimates do not account for the presence of intervening structures or topography, which could further reduce noise and vibration levels at receptor locations. Therefore, the noise and vibration levels presented herein represent a conservative estimate of actual construction noise.

**Table 4.10-6
 Significance of Changes in Operational Roadway Noise Exposure**

Existing Noise Exposure (dBA Ldn or Leq)	Allowable Noise Exposure Increase (dBA Ldn or Leq)
45-50	7
50-55	5
55-60	3
60-65	2
65-74	1
75+	0

Source: Federal Transit Administration. Transit Noise and Vibration Impact Assessment. September 2018.

Construction noise would be significant if it would occur between the hours of 6 PM and 7 AM Monday through Saturday or anytime on Sunday; however, Oxnard City Code Section 7-188 exempts construction and grading activities from the City’s noise restrictions provided the activities occur between the hours of 7:00 AM and 6:00 PM Monday through Saturday.

³ The FTA’s 2018 manual is the most current authoritative source of recommended criteria for significant increases in traffic noise due to projects.



The City has not adopted specific numerical thresholds for groundborne vibration impacts. Therefore, this analysis uses the FTA’s vibration impact thresholds to determine whether groundborne vibration would be “excessive.” A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Consequently, the FTA recommends an 80 VdB threshold for infrequent events at residences and buildings where people normally sleep (e.g., the future project area residences and the residences 500 feet southwest of the project area). The FTA does not consider most commercial and industrial uses to be noise-sensitive (except for those that depend on quiet as an important part of operations, such as sound recording studios) and, therefore, does not recommend thresholds for groundborne vibration impacts to such uses. In terms of groundborne vibration impacts on structures, the FTA states that groundborne vibration levels in excess of 100 VdB would damage fragile buildings and levels in excess of 95 VdB would damage extremely fragile historic buildings.

b. Project Impacts and Mitigation Measures. Table 4.10-7 lists the thresholds under consideration in the noise analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.10-7
 Summary of Noise Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Would the project generate or expose persons to noise levels in excess of standards established in the Oxnard 2030 General Plan or noise ordinance, or applicable standards of other agencies;			X	
2. Would the project generate or expose persons to excessive groundborne vibration or groundborne noise levels?			X	
3. Would the project generate a substantial temporary or periodic increase in ambient noise in the project vicinity above levels existing without the project?			X	
4. Would the project generate a substantial permanent increase in ambient noise in the project vicinity above levels existing without the project?			X	
5. For a project located within the airport land use plan for Oxnard Airport or within two miles of Naval Base, Ventura County at Point Mugu, would the project expose people residing or working in the project area to excessive noise levels?			X	
6. Would the project expose non-human species to excessive noise?			X	



Impact N-1 Construction-related activities associated with potential buildout of the project area would intermittently generate high noise levels and groundborne vibration within and adjacent to the project area. This may affect existing and future receptors in or near the project area. However, construction noise would be temporary and subject to the requirements of City Code Article XI Sound Regulation, which would ensure that this impact would remain Class III, less than significant.

As shown in Table 4.10-5, measured ambient noise levels in the project area range from 67.5 dBA to 78.6 dBA Leq. Nearby noise-sensitive land uses, including the existing residential neighborhoods 75 feet north and 130 feet east of the project area, and the residences located on the area south of Teal Club Road proposed for Annexation, could be exposed to temporary construction noise and groundborne vibration during buildout of the TCSP and nine additional parcels to be annexed. Residences south of Teal Club Road in the additional annexation area would be approximately 50 feet away from Phase 1 TCSP development and approximately 25 feet away from development in the Annexation area. In addition, Phase 1 TCSP development, including residential uses and other sensitive uses, could be exposed to temporary construction noise and groundborne vibration that occur during Phase 2 TCSP development and development in the additional Annexation area. As shown in Figure 2-3 in Section 2.0, *Project Description*, residential uses (PA1, PA2, PA3, and PA5) would be immediately adjacent to the Phase 2 development area. Therefore, residential uses in the Phase 1 development area would be exposed to construction noise during Phase 2 development.

The sensitive receptors closest to potential project area construction sites are the existing residences in the additional Annexation area 25 feet from potential future manufacturing uses. As illustrated in Table 4.10-8, noise levels associated with the use of heavy equipment at construction sites can range from about 82 to 91 dBA 25 feet from the source, depending upon the types of equipment in operation at any given time and the phase of construction. The operation of heavy equipment during construction would result in temporary increases in noise in the immediate vicinity of the project area. The highest noise levels would generally occur during grading, excavation, and foundation development, which involve the use of such equipment as backhoes, bulldozers, shovels, and front-end loaders. In addition, construction vehicles traveling on local roadways can generate intermittent noise levels that affect adjacent receptors.

Vibration from construction activities could also have an impact on nearby noise-sensitive land uses. Table 4.10-9 identifies various vibration velocity levels for the types of construction equipment that would operate in the project area during construction.

The primary sources of man-made vibration are blasting, grading, pavement breaking and demolition. The primary vibratory source during construction within the project area would likely be large bulldozers to demolish existing structures and loaded trucks for the import of construction materials or the export of soil or demolition materials. As shown, typical bulldozer or loaded truck activities generate an approximate vibration level of 58-87 Vdb at a distance of 25 feet. Vibration levels in excess of 80 VdB may result in periodic annoyance. As such, existing residences in the additional Annexation area approximately 25 feet from potential future manufacturing uses may intermittently be disturbed by vibration noise during the day.



Vibration levels would not exceed 100 VdB, which is the threshold where minor damage can occur in fragile buildings.

**Table 4.10-8
 Typical Noise Levels at Construction Sites**

Equipment Onsite	Typical Level (dBA) 25 Feet from the Source	Typical Level (dBA) 50 Feet from the Source	Typical Level (dBA) 75 Feet from the Source	Typical Level (dBA) 130 Feet from the Source
Air Compressor	86	80	76.5	71.7
Backhoe	86	80	76.5	71.7
Concrete Mixer	91	85	81.5	76.7
Crane, mobile	89	83	79.5	74.7
Dozer	91	85	81.5	76.7
Jack Hammer	94	88	84.5	79.7
Paver	91	85	81.5	76.7
Saw	82	76	72.5	67.7
Truck	90	84	80.5	75.7

Noise levels assume a noise attenuation rate of 6 dBA per doubling of distance. The analysis provided does not account for attenuating factors, such as topography, structures, or vegetation. Such factors would decrease the noise levels at sensitive receptors.

Source: Federal Transit Administration (FTA), September 2018

**Table 4.10-9
 Vibration Source Levels for Construction Equipment**

Equipment	Approximate VdB			
	25 Feet	50 Feet	75 Feet	130 Feet
Large Bulldozer	87	81	77	72.7
Loaded Trucks	86	80	76	71.7
Jackhammer	79	73	69	64.7
Small Bulldozer	58	52	48	43.7

Vibration levels assume an attenuation rate of 6 VdB per doubling of distance.

Source: Federal Transit Administration (FTA), September 2018

Based on the information presented in Table 4.10-8 and Table 4.10-9, temporary construction noise and groundborne vibration could affect sensitive noise receptors. Noise levels could reach up to 95 dBA and vibration levels could reach up to 87 VdB at a distance of 25 feet. These noise levels would exceed the City’s standards for allowable exterior noise at residential uses and would be intermittently audible as the project area builds out.

Sensitive receptors are less noise sensitive during daytime hours. The City has a standard condition of approval for construction projects to limit construction hours to between the hours



of 7:00 AM and 6:00 PM Monday through Saturday, consistent with Oxnard City Code Section 7-188. Therefore, although project construction would result in noise levels that would exceed City standards at residential uses, because these activities would occur during the daytime hours, impacts would be less than significant. Further, construction-related noise and vibration would be temporary and intermittent in nature and would not result in long-term noise impacts.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact N-2 Project area operations would generate noise that may periodically be audible to existing land uses near and in the project area. However, operational noise would not exceed City noise standards. This is a Class III, less than significant impact.

As discussed above, sensitive receptors are located at distances between 50 and 130 feet from the TCSP area and are located in the additional Annexation area where future manufacturing uses may be developed. The dominant existing noise source from the TCSP area is agricultural equipment (e.g., tractors). Agricultural equipment for the cultivation of row crops generates noise on an intermittent basis, especially during tillage of the soil, seeding or planting, fertilization, and harvesting. Existing noise from the additional Annexation area includes noise typical of commercial, industrial and residential uses. In addition, noise on roadways surrounding the project area (Ventura Road, Teal Club Road, and Doris Avenue) is audible at adjacent receptor locations.

The proposed project would involve replacing agriculture-related noise with noise typical of commercial, business park, manufacturing, residential uses. Noise sources associated with the proposed commercial and business park uses in the TCSP area and manufacturing uses in the Annexation area include noise generated by loading docks, mechanical equipment (such as heating, ventilation and air conditioning units), deliveries, trash hauling activities, and parking lots (such as engine starts, car doors closing, horns, and alarms). Noise generated by residential uses typically includes noise from landscaping equipment, car operation, children playing, and conversations. Noise from residential, commercial, business park, and manufacturing land uses would be intermittent but more frequent than existing noise generated by agricultural equipment in the TCSP area. As discussed in Section 4.11, *Population and Housing*, the proposed project would result in an estimated increase 3,909 residents to the project area, in addition to new commercial and light industrial uses. Greater density would increase the amount of mechanical equipment and vehicles operating and generating noise in the project area.

Noise associated with operation of the proposed project could be audible at nearby residential areas. However, commercial and manufacturing uses are subject to the City's Noise Ordinance (OCC Section 7-180 et. seq.) which prohibits sound levels above specified noise standards. Although the specific design of individual structures and residences in the project area are not known at this time, as shown in Figure 2-3 in Section 2.0, *Project Description*, residential and non-residential uses would generally be separated. For example, the business research park area would be separated from residential areas at least approximately 100 feet by existing and planned roadways. In addition, residential, school, commercial, retail, dining, and professional office uses



are not generally significant noise generators. Noise generated by these activities would be intermittent in nature and therefore would likely not exceed City standards. Although project area noise sources may create temporary annoyances to nearby receptors, all project area activities would be subject to the City's Noise Ordinance (OCC Section 7-180 et. seq.) which prohibits sound levels above specified noise standards. Impacts would be less than significant.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Compliance with the City's Noise Ordinance would prohibit sound levels above specified noise standards and prevent loud and excessive noise. Impacts would be less than significant.

Impact N-3 Traffic generated by development under the proposed project would incrementally increase traffic-related noise in the vicinity of the project area. However, because increases in noise would not exceed significance thresholds on any study area road segment, this impact would be Class III, less than significant.

Development facilitated by the proposed project would increase the number of vehicle trips to and from the project area, which would increase traffic noise on area roadways in the vicinity of the project area. Traffic levels from the 2014 traffic study were used to estimate the change in noise levels resulting from increased traffic on 10 roadway segments within the vicinity of the project area. Table 4.10-10 shows exterior noise levels that would result from project-related traffic increases. As shown in the table, based on the traffic increases projected to occur, project implementation would cause noise level increases of up to 1.4 dBA. The projected noise increases would not exceed significance thresholds on any study area road segment. Impacts from project-related traffic noise increases would therefore be less than significant.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact N-4 Future residences in the TCSP area would be exposed to ambient traffic noise levels that may exceed City standards. Through the plan check review process for new developments, the City would ensure acceptable noise levels at residences. Furthermore, the exposure of new sensitive receptors to noise would be an effect of the environment on the project, which is not a significant impact under CEQA. Therefore, this would be a Class III, less than significant impact.

The following analysis of the exposure of new sensitive receptors to ambient noise is presented for informational purposes only. Noise exposure is an issue of concern to the community, and it is also relevant to the proposed TCSP's consistency with the City's noise standards. However, the Second District Court of Appeal found in 2011 that analysis of impacts of the environment on a project (such as the exposure of new residents to ambient noise) is not required for CEQA compliance (*Ballona Wetlands Land Trust et al. v. City of Los Angeles*).



**Table 4.10-10
 Pre-Project and Post-Project Traffic Noise Impacts on Existing Development**

Roadway	Projected Noise Level (dBA Leq)				Change In Noise Level (dBA Leq)		FTA Thresholds	Significant Impact?
	2020 No Project (1)	2020 + Project (2)	Cumulative 2030 No+ Project (3)	Cumulative 2030 + Project (4)	Project Only (2 minus 1)	Cumulative Growth + Project (4 minus 3)		
Victoria Ave north of Doris Ave	72.9	73.0	73.2	73.2	0.1	0.0	1	No
Victoria Ave south of Teal Club Rd	76.1	76.1	76.1	76.2	0.0	0.1	0	No
Doris Ave west of Patterson Rd	60.9	61.5	61.8	61.8	0.6	0.0	2	No
Doris Ave east of Patterson Rd	64.0	63.9	65.3	65.2	0.1	-0.1	1	No
Teal Club Rd west of Patterson Rd	57.6	59.0	59.0	59.3	1.4	0.3	3	No
Teal Club Rd east of Patterson Rd	61.2	61.0	62.2	62.0	-0.2	-0.2	2	No
Patterson Rd south of Doris Ave	57.4	58.1	59.0	58.1	0.7	0.9	3	No
Ventura Rd north of Doris Ave	72.6	73.0	73.3	73.5	0.4	0.2	1	No
Ventura Rd south of Doris Ave	72.8	73.2	72.9	73.2	0.4	0.3	1	No
Ventura Rd south of Teal Club Rd	73.3	73.5	73.7	73.6	0.2	-0.1	1	No

* Noise thresholds shown in Table 4.10-7.

**This is a fractional increase due to rounding. A noise level increase of less than 0.1 DBA would not be audible.

Note: Noise levels estimated in this table are based on trip generation rates for 990 residential units, 192,000 square feet of business park, and urban village commercial land uses, as well as 23.9 acres of community neighborhood parks and an eight-acre public/ semi-public use area. As shown in Section 4.13, Traffic, trip generation rates for the proposed project would be lower. Thus, this table represents a conservative estimate.

Source: Noise levels modeled in FHWA TNM2.5. Existing + Project noise level based on existing noise levels and completed development, while cumulative growth + project generates noise levels under 2030 traffic levels. Noise levels within 50 feet of roadway centerline.



The proposed TCSP would facilitate future development that includes noise sensitive receptors such as residences. Future residential development in the TCSP area would be located adjacent to planned roadway segments (such as Coronado Place and Beverly Drive, see Figure 2.3 in Section 2.0, *Project Description*) and therefore would be exposed to vehicle noise. The precise location of future sensitive receptors under the TCSP relative to future roadways is not known at this time. Generally, as shown in Figure 2-3 in Section 2.0, *Project Description*, residential uses would be located next to proposed roadways such as Coronado Place (PA 12, PA 2, PA 11, and PA 4) and Beverly Drive (PA 10, PA 11, PA 1, PA 3, PA 4, PA5, PA6, and PA 7). Internal roadways would be built during Phase 1 development. Depending on the traffic noise levels on internal roadways, proximity of receptors to roadway segments, and the type of building material used, exterior traffic noise may result in internal noise levels in future receptors in the TCSP area above the City's interior residential noise standards of 50 dBA during the daytime and 45 dBA during the nighttime (see Table 4.10-4).

The exterior-to-interior noise attenuation of standard building materials used for residential development can be up to 30 dBA (FTA, September 2018). Therefore, for sensitive receptors located near internal roadways with noise levels above 75 dBA, interior noise levels may exceed City standards. As shown in Table 4.10-10, high traffic roadways in the vicinity of the project area could have noise levels from between 58 and 76.2 dBA at 50 feet from the roadway centerline in cumulative plus project conditions. However, the future TCSP roadways would have lower traffic levels than those analyzed in Table 4.10-10 as they would contain internal TCSP traffic only. Therefore, noise levels on interior roadways would be lower than noise levels estimated in Table 4.10-10. Nonetheless, depending on the exact distance between sensitive receptors and planned internal roadways and on internal traffic volumes, project area residences could be exposed to interior noise levels that exceed 45 dBA. During the plan check review process for future residential developments in the TCSP area, the City would ensure that residences are designed to attain an acceptable interior noise level of 45 dBA or lower.

As discussed above, the exposure of new residents in the TCSP area to ambient traffic noise is an impact of the environment on the project, which does not constitute a significant impact under CEQA. Therefore, this impact would be less than significant.

Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact N-5 Aircraft associated with the Oxnard Airport would periodically generate noise that may be audible to future land uses within the project area. However, aircraft noise in the project area would not exceed City noise standards. Furthermore, the exposure of new sensitive receptors to noise would be an effect of the environment on the project, which is not a significant impact under CEQA. This is a Class III, less than significant impact.

The following analysis of the exposure of new sensitive receptors to ambient aircraft noise is presented for informational purposes only. As discussed in Impact N-4, the Second District Court of Appeal found in 2011 that analysis of impacts of the environment on a project (e.g., the



exposure of new residents to aircraft noise) is not required for CEQA compliance (*Ballona Wetlands Land Trust et al. v. City of Los Angeles*).

The project area is not in the vicinity of a private airstrip. The public Oxnard Airport runway is approximately 750 feet south of the TCSP area and 225 feet south of the proposed additional Annexation area. Operation of aircraft at this airport may intermittently generate noise that is audible within the project area. Figure 4.10-2, based on Figure 6-2 in the City of Oxnard 2030 General Plan Program EIR, shows the airport's 65, 70, and 75 dBA CNEL noise contours. Policy SH-6.12 in the City's 2030 General Plan requires that "only compatible new development is located within the Oxnard Airport 65 dBA CNEL contour."

No part of the TCSP area is located within the 65 dBA CNEL noise contour. Therefore, no residential or other noise sensitive uses associated with the TCSP would be exposed to excessive airport noise.

The additional Annexation area south of Teal Club Road would be within the 65 dBA noise contour and a small part of the southern portion of the additional Annexation area would be within the 70 dBA noise contour (see Figure 4.10-2). However, this area would be zoned for manufacturing, which would be compatible new development in accordance with 2030 General Plan Policy SH-6.12. Sensitive receptors including residences, schools, child and daycare facilities, health care facilities, libraries, and churches would not be located in the additional Annexation area. Impacts would be less than significant.

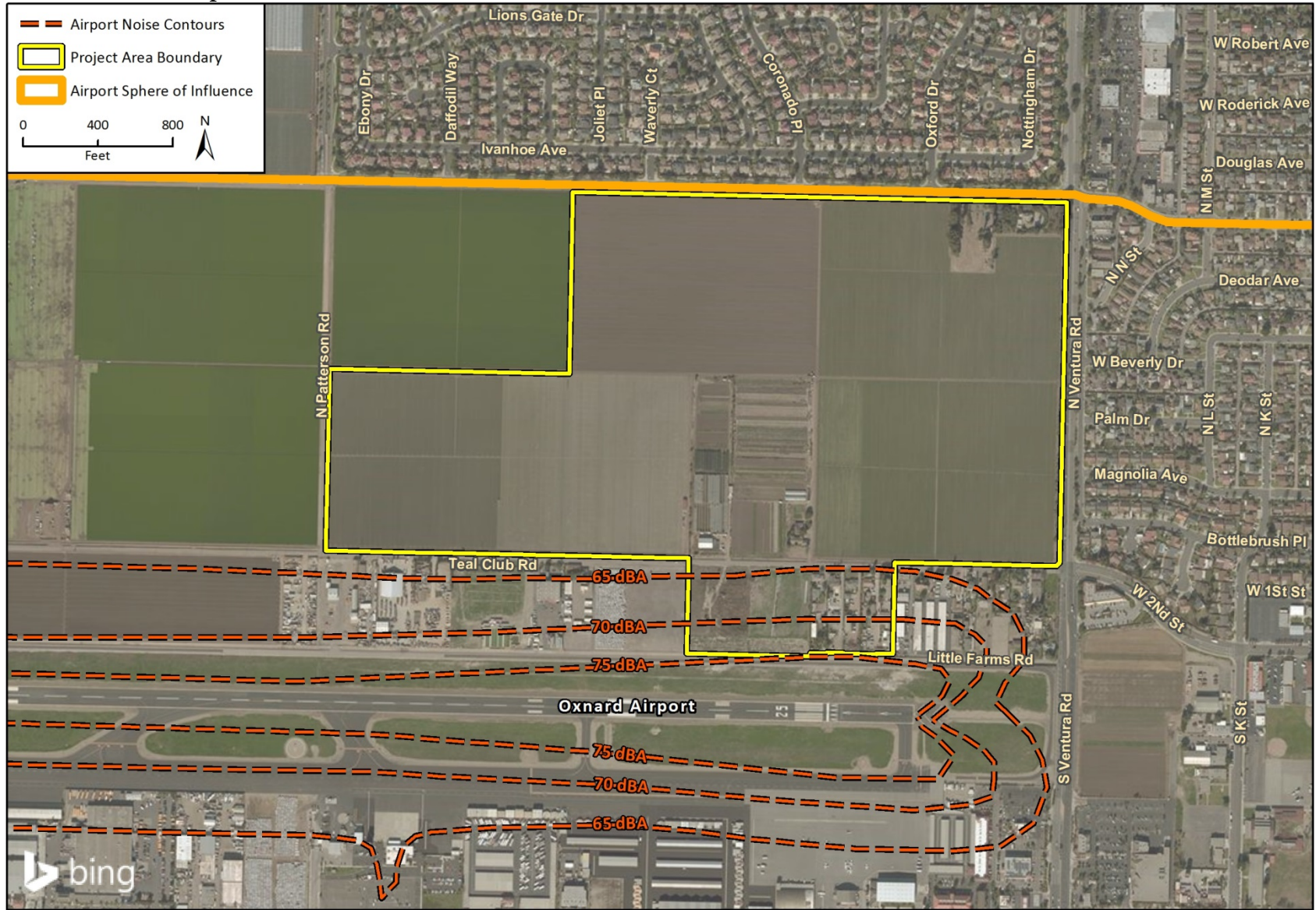
Mitigation Measures. No mitigation measures are required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. Cumulative development would incrementally increase noise levels throughout the City. In accordance with the City's 2030 General Plan, cumulative development would accommodate a population within a range of 238,000 to 286,000 people in Oxnard by 2030, depending on household size and other demographic factors. The City of Oxnard 2030 General Plan Program EIR (certified 2011) concludes that impacts related to exposure of noise-sensitive uses to traffic noise, railroad noise, and groundborne vibration would be significant and unavoidable. The land uses proposed under the proposed project make up a part of the total development called for under the 2030 General Plan and were included in the development analyzed in the 2030 General Plan Program EIR. The proposed project is consistent with development of the project area and other cumulative projects already examined in the 2030 General Plan Program EIR. As discussed above, noise impacts associated with this proposed project would be less than significant. Therefore, the project would not significantly contribute to the unavoidably significant cumulative noise impacts identified in the General Plan EIR.



Figure 4.10-2 Oxnard Airport Noise Level Contours



Imagery provided by Microsoft Bing and its licensors © 2019. Additional data provided by City of Oxnard GIS and Planning, September 2012.
Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc. Additional data provided by County of Ventura 2018.

Fig 4.10-2 Oxnard Airport Noise Level Contours



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4.11 POPULATION, EDUCATION, AND HOUSING

This section evaluates the proposed project’s potential impact on population, housing and employment in the City of Oxnard.

4.11.1 Setting

a. City of Oxnard Population, Housing, and Employment. Oxnard is the largest city in Ventura County, with a 2020 population estimate of 206,352 (California Department of Finance [DOF], January 2020). Table 4.11-1 provides the 2020 estimates of population and housing for the City of Oxnard and Ventura County as a whole. Oxnard accounts for approximately 25% of the countywide 2020 population of 842,886. The City’s 56,240 households make up approximately 19% of the County’s total households. The average number of persons per household in Oxnard is 3.89, more than the countywide average of 3.01 persons per household.

**Table 4.11-1
 2019 Housing and Population**

	Oxnard	Ventura County	Percent of County
Households	56,240	291,210	19.3
Population	206,352	842,886	24.5
Persons/Household	3.89	3.01	-

Source: .California Department of Finance, 2020.

Table 4.11-2 shows employment, households and population projections for 2035 and 2040 for Oxnard compiled by the Southern California Association of Governments (SCAG). As shown, according to the most recent data available (2017), the number of jobs in the City is estimated at 65,550, which is 18% of the 358,229 total jobs in Ventura County.

**Table 4.11-2
 SCAG Employment, Households and Population Projections for Oxnard**

	2020	2035 ¹	2040 ¹
Employment (number of jobs)	65,550 (2017) ²	78,200	79,200
Households	56,240 ³	59,800	60,100
Population	206,352 ³	236,300	237,300

¹ Source: SCAG. Growth Forecasting. Integrated Growth Forecast. Accessed November 2020.

² SCAG, Profile of the City of Oxnard, May 2019

b. Project Area Setting. The TCSP area is in active agricultural use, currently cultivated with row crops. There are several agricultural accessory buildings in the TCSP area, the largest being a barn and greenhouses in the central-southern portion along Teal Club Road. The area also supports two single-family residences, one just east of the barn and one in the northeastern corner of the site at Doris Avenue and North Ventura Road.



The additional parcels to be Annexed south of Teal Club Road are a mix of vacant land (the westernmost three parcels) and approximately six residences and industrial development (the easternmost six parcels, which include approximately six houses).

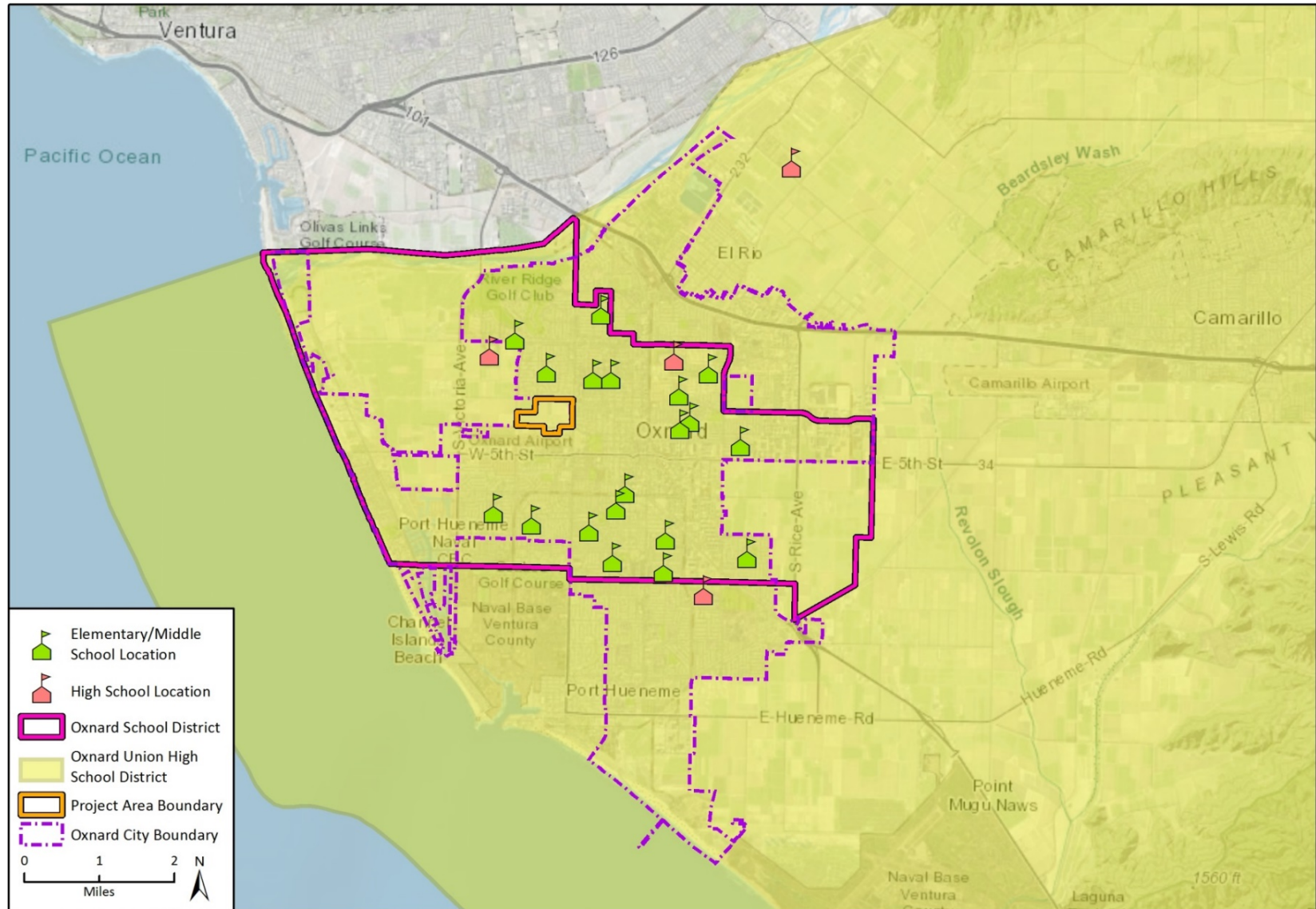
c. Schools Setting. In the project area, public education is provided by the Oxnard School District (OSD) and the Oxnard Union High School District (OUHSD) (see Figure 4.11-1). The OSD provides educational services for kindergarten through eighth grade students, while the OUHSD provides educational services for ninth through twelfth grade students. The attendance boundaries of individual schools are adjusted by the school districts periodically on an as-needed basis. For this reason, students from homes developed in the TCSP area could potentially affect enrollment at any school within the District. As such, it is unknown which specific schools could be impacted. For this reason, the analysis focuses on overall school district capacities. Further, although in March 2018, OSD approved a new school site adjacent to the project area that would include a district office, a 700-student elementary school, and a 1,200-student middle school, the timing of construction and opening of these schools is unknown. The capacity and enrollment for each school in the OSD is summarized in Table 4.11-3. As shown, OSD is operating at 107% capacity. However, with the proposed new elementary and middle school (additional capacity of 1,900 students) the OSD would operate at below capacity.

According to the OUHSD's 2020 *Developer Fee Justification Study*, the District currently has a capacity of 15,234 students (not including the facilities for the Adult Transitional SDC) and the 2019/2020 enrollment was 17,091 students in grades 9-12. Therefore, enrollment exceeds school capacity by 1,857 students.

Both the OSD and OUHSD provide bus services. The OSD provides bus service for students within the district who live greater than 1.5 miles from their assigned Grade Pre-K-6 school or two miles from their assigned Grade 7-8 school (Adriana Romero, July 2012). The OUHSD provides bus service for students within the district who live more than 3 miles from their assigned school site (Stephen McFarland, July 2012).



Figure 4.11-1 Oxnard School Districts



Imagery provided by Microsoft Bing, Esri and their licensors © 2019. Additional data provided by City of Oxnard 2007.
 Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc.

Fig 4.12-3 Oxnard School District and Oxnard High School District



**Table 4.11-3
 Current Enrollments and Capacity at Oxnard School District**

District and Schools	Enrollment 2018-2019¹	Total Permanent Classrooms	Capacity²	Percent of Capacity
Brekke K-6 Elementary	600	27	675	89%
Elm K-6 Elementary	574	12	300	191%
Harrington K-6 Elementary	588	17	425	138%
Marina West K-6 Elementary	595	20	500	119%
Marshall K-6 Elementary	593	28	700	85%
McAuliffe K-6 Elementary	698	28	700	100%
McKinna K-6 Elementary	711	17	425	167%
Ramona K-6 Elementary	606	26	650	93%
Ritchen K-6 Elementary	612	28	700	87%
Rose Avenue K-6 Elementary	622	31	775	80%
Sierra Linda K-6 Elementary	661	21	525	126%
Chavez K-8 Elementary	896	41	1,052	85%
Curren K-8 Elementary	1,026	41	1,052	98%
Driffill K-6 Elementary	1,169	41	1,052	111%
Kamala K-8 Elementary	1,119	40	1,027	109%
Lemonwood K-8 Elementary	844	16	411	205%
Soria K-8 Elementary	1,032	37	950	109%
Frank 6-8 Intermediate	1,223	45	1,215	100%
Fremont 6-8 Intermediate	1,065	36	972	110%
Haydock 6-8 Intermediate	895	32	864	104%
Total	16,134	584	14,970	107%

N/A = not available

¹ Enrollment data from California Department of Education DataQuest website, August 2019.

² Capacity data from written and personal communication, Jorge Gutierrez, Executive Director of Facilities Planning, Engineering, and Operations, OSD, December 2014; Based on state loading standards of 25 students per classroom for elementary grades and 27 students per classroom for middle grades.

Note: this table does not include the future planned 700-student elementary and 1,200 student middle schools

Funding for Public Education. School districts are funded by local property tax revenue accrued at the state level and then allocated to each school district based primarily on average daily student attendance. Because state funding for capital improvements has lagged behind enrollment growth, physical improvements to accommodate new students come primarily from assessed fees on development projects and local facility bonds. In 1986, the State Legislature approved Assembly Bill 2926 (Chap. 887), which authorized school districts to levy school impact fees on new development projects, and at the same time placed a cap on the total amount of fees that could be levied. School facilities legislation (California Government Code Section 65995) was enacted to generate revenue for school districts for capital acquisitions and improvements. This legislation allows one-time fees on new development projects. These fees are divided between the primary and secondary schools and are termed Level One fees. The current statutory Level One fee that may be imposed on residential construction is \$4.08 per square foot of assessable space for new residential development and \$0.66 per square foot of



chargeable covered and enclosed commercial/industrial development for the impact to Kindergarten through 12th grades (OUHSD, 2020)

In the past, statutory limitations regarding the payment of development fees to school districts were placed on projects that did not require quasi-legislative approvals, such as Zoning Amendments, Rezoning, Plan Amendments, Specific Plans, and Development Agreements, as decided in the Mira, Hart, and Murietta State Supreme Court cases. In cases where projects required quasi-legislative approvals, the Courts allowed local agencies to collect additional fees as mitigation measures under CEQA. However, the November 1998 passage of Proposition 1A, and the funding made available through its passage, requires implementation of Senate Bill 50 (SB 50) and eliminates the additional funding allowed per the Mira, Hart, and Murietta cases. Instead, SB 50 provides for Level Two and Level Three fees in residential development; these fees are allowed to be in excess of the previous limitation. Level Two fees require the developer to provide one-half (50%) of the costs of housing students in new schools, while the state would provide the other half. Level Three fees require the developer to pay the full cost of housing the students in new schools and would be implemented at the time the funds available from Proposition 1A are expended. School districts must demonstrate to the State their long-term facilities needs and costs based on long-term population growth in order to qualify for this source of funding. Once qualified, the districts may impose fees as calculated per SB 50. According to Government Code Section 65996, the development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.”

The OSD is eligible for Level One and Level Two funding. The current Level One school developer fee rate for OSD is \$3.83 per square foot for residential space and \$0.436 per square foot for commercial/industrial development (OSD, 2020). OUHSD is not eligible for Level Two or Level Three funding. OUHSD Level One fee amounts vary per elementary school feeder district. For Oxnard Elementary, OUHSD has a rate of \$1.39 per square foot for residential space and \$0.22 per square foot of commercial space (OUHSD, 2020).

4.11.2 Impact Analysis

a. Methodology and Significance Thresholds. In accordance with the City’s 2017 CEQA Guidelines, a project would result in a significant impact on the environment if it would:

1. *Involve a General Plan Amendment that could result in an increase in population beyond that projected in the 2030 General Plan that may result in one or more significant physical environmental effects*
2. *Induce substantial growth on the project site or surrounding area, resulting in one or more significant physical environmental effects*
3. *Result in a substantial (15 single--family or 25 multi--family dwelling units – about one-half block) net loss of housing units through demolition, conversion, or other means that may necessitate the development of replacement housing*
4. *Result in a net loss of existing housing units affordable to very low--- or low--- income households (as defined by federal and/or City standards), through demolition, conversion, or other means that may necessitate the development of replacement housing*



5. *Cause an increase in enrollment at local public schools that would exceed capacity and necessitate the construction of new or expanded facilities?*
6. *Directly or indirectly interfere with the operation of an existing or planned school?*

The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.11-4 lists the thresholds under consideration in the population, education, and housing analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.11-4
 Summary of Population, Education, and Housing Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Involve a General Plan Amendment that could result in an increase in population beyond that projected in the 2030 General Plan that may result in one or more significant physical environmental effects?			X	
2. Induce substantial growth on the project site or surrounding area, resulting in one or more significant physical environmental effects?			X	
3. Result in a substantial (15 single-family or 25 multi-family dwelling units – about one-half block) net loss of housing units through demolition, conversion, or other means that may necessitate the development of replacement housing?			X	
4. Result in a net loss of existing housing units affordable to very low- or low-income households (as defined by federal and/or City standards), through demolition, conversion, or other means that may necessitate the development of replacement housing?			X	
5. Cause an increase in enrollment at local public schools that would exceed capacity and necessitate the construction of new or expanded facilities?			X	
6. Would the project directly or indirectly interfere with the operation of an existing or planned school?			X	

Impact PEH-1 The proposed project would add 982 residential units and an estimated 2,651 employees and 3,909 residents to the project area. However, because these increases are within Oxnard 2030 General Plan and SCAG projections for the City, impacts related to housing and population growth would be Class III, *less than significant*.

Project implementation would result in a net increase of 982 residential units (990 units proposed minus eight existing units to be demolished), up to 60,000 square feet of neighborhood serving



commercial retail, mixed use, and office uses in a variety of single- and mixed-use structures, and a 132,000 square foot Business Research Park, as described in Section 2.0, *Project Description*. As discussed in Section 4.9, *Land Use and Planning*, the project does not involve a General Plan Amendment. Potential buildout of the additional parcels to be Annexed and rezoned south of Teal Club Road could result in up to approximately 347,608 square feet of light industrial development, of which 173,804 square feet is assumed to be manufacturing space and 173,804 square feet is assumed to be warehouse space. Based on the City average of 3.98 persons per household, the proposed addition of 982 residential units would generate an increase of approximately 3,909 residents. Based on the estimated 2020 citywide population of 206,352 residents, the addition of 3,909 residents would increase Oxnard’s population by approximately 1.9% added incrementally over an approximately 10-year period as the project area builds out. The addition of 982 residential units would increase the current (2020) number of households in the City by approximately 1.7%.

The proposed project would add an estimated 2,651 employees at full buildout. Table 4.11-5 shows the estimated employment at buildout of the proposed project.

**Table 4.11-5
 Estimated On-Site Employment at Project Buildout**

Land Use	Building Area (square feet)	Employees / sf *	Estimated Jobs
Commercial/Retail	60,000	1/412	146
R&D/Flex Space (Business Research Park)	132,000	1/277	477
Light Manufacturing (Annexed Parcels)	173,804	1/202	861
Warehouse	173,804	1/149	1,167
Total			2,651

* Employee generation factors from SCAG’s 2001 Employee Density Study

Table 4.11-6 compares project-generated population, employment and housing growth to SCAG growth projections for the City of Oxnard. As indicated, the net 3,909 new residents associated with project buildout would make up approximately 13% of the projected citywide population growth through 2035 and 2040. The net 982 housing units associated with project buildout would make up approximately 11% of the projected citywide housing growth through 2035 and 2040. The 2,651 new jobs associated with project buildout would make up approximately 21% of the projected citywide employment growth through 2035 and 19% of projected citywide employment growth through 2040. Neither project-generated population housing nor employment estimates would exceed citywide projections.



**Table 4.11-6
 Comparison of Project Population and Housing Growth to City Projections**

	Projected Citywide Growth Through 2035 *			Project Growth as a % of Overall Growth	
	Proposed Project (net)	SCAG Growth Projections for Oxnard		City of Oxnard	
		2035	2040	2035	2040
Housing *	982 units ¹	8,702 units	9,002 units	11%	11%
Population	3,909 residents	29,801 residents	30,801 residents	13%	13%
Employment	2,651 jobs	12,650 jobs	13,650 jobs	21%	19%

* Citywide projections are taken from tables 4.11-1 and 4.11-2.

¹ 990 proposed dwelling units minus eight existing occupied single-family units to be demolished

As indicated in Table 4.11-6, the increases in housing, employment and population as a result of the proposed project are within SCAG projections for the City. Moreover, buildout of the proposed TCSP was included in the growth and development estimates used for the City’s 2030 General Plan adopted in 2011. Impacts would be less than significant.

Mitigation Measures. None required.

Significance After Mitigation. Impacts related to growth in housing and population would be less than significant without mitigation.

Impact PEH-2 The proposed project would involve demolition of up to eight on-site single-family residential units that are not considered “affordable” units, which would displace approximately eight occupied housing units and the on-site population and reduce the City’s housing stock. The proposed project would involve the development of up to 990 housing units, with at least 15%, or 148, of those housing units reserved as “affordable.” This would be required to meet the City’s very low- and low-income price restrictions. Therefore, impacts related to the displacement of housing and population would be Class III, *less than significant*.

The proposed TCSP includes the construction of up to 990 residential units, development of 192,000 gross square feet (gsf) of business park uses and a general commercial space. In order to accommodate the proposed TCSP, all existing project area structures (existing barn, greenhouses, and two single-family residences) would be demolished and/or removed. As noted above in *Setting*, there are also approximately six residences on the nine additional parcels proposed for annexation. Because the residences in the Annexation area are subject to higher levels of airport noise than those in most surrounding areas, including the TCSP area, and because they would be located in a potentially developing Light Manufacturing zone, it is reasonable to anticipate that residents may move out or redevelop their properties with industrial uses over time. Thus, the Annexation and Rezoning may lead to displacement, directly or indirectly, of some or all of those residents as well.



The proposed project would displace both the single-family residences and the project area population supported by those residences. As discussed in Section 2.0, *Project Description*, the TCSP area is designated “Urban Village” in the City of Oxnard 2030 General Plan, which is required to provide a minimum of 15% affordable housing. While none of the eight single-family residences are designated as affordable units, 15%, or 148, of the 990 proposed residential units would be reserved as “affordable” units. Affordable units would comprise 15% of the total project area residential development, as the entire residential project area is defined as “Urban Village.” Levels of affordability would be approximately 40% Very Low income and 60% Low income. Approximately 108 affordable units would be built as part of Phase 1 and 40 would be built as part of Phase 2. Affordable units would be generally distributed between Planning Areas 5, 11, and 12.

The eight residences involved, including those on the TCSP area and those on the nine parcels proposed for Annexation, would not constitute substantial displacement. The project would not involve the removal of more than 15 single-family units and would not result in a net loss of affordable housing units. In addition, although buildout in the TCSP area and nine additional parcels could displace several residential units, the proposed project would include 990 new residential units, including 148 affordable units, which is a substantial net increase in housing for the project area. Therefore, impacts related to the displacement of housing and population would be less than significant.

Mitigation Measures. None required.

Significance After Mitigation. Impacts related to the displacement of housing and people would be less than significant without mitigation.

Impact PEH-3 The proposed project would generate an estimated 491 K-8th Grade school-age students and 166 9-12th Grade school-age students. This could adversely affect school facilities in the Oxnard School District and Oxnard Union High School District. However, with payment of required school impact fees, impacts would be reduced to a Class III, *less than significant*, level.

Table 4.11-7 shows the projected number of students that would be generated by the proposed project. These projections are based on a student generation factors used by the OSD and OUHSD to estimate students generated by new development. Student generation factors for OSD were derived from the *School Facilities Needs Analysis* (February 2012). Student generation factors for OUHSD were derived from the *Fee Justification Report for New Residential and Commercial/Industrial Development* (August 2020). As indicated in the table, the proposed project would generate an estimated 491 new elementary and middle school students at the OSD, and 65 high school students at the OUHSD. It is possible that residents and students would relocate from elsewhere in the OSD or OUHSD service areas; however, this analysis assumes all new students in the systems.



**Table 4.11-7
 School District Generation Factors and Student Generation**

School District	Projected Units	Student Generation Factor (students per dwelling unit)	Students Generated
Oxnard School District	Single Family Detached - 220	1.0000	220
	Single Family Attached ¹ - 770	0.3520	271
Oxnard Union High School District	Single Family - 220	0.08	18
	Multi Family - 770	0.06	47
Total Students			556

¹ For purposes of this analysis all attached units were assumed to be single family attached (townhomes, condominiums, etc.) as this type of unit had the higher generation factor.
 Source: Oxnard School District School Facilities Needs Analysis, February 2019 and Oxnard Union High School District Fee Justification Report, August 2020.

Table 4.11-8 compares projected enrollment at the schools serving the project area to the current capacity of those schools. Based on the current enrollment and projected number of students generated by the proposed project, implementation of the project would put the Oxnard School District approximately 11% over capacity with a total of about 16,625 students. In addition, the projected number of students generated by the proposed project would add to existing overcrowded conditions at Oxnard Union High School District. The proposed project would put OUHSD 13% over capacity with a total of 17,156 students.

**Table 4.11-8
 Project School Enrollment and Capacities**

School District	Capacity	Current Enrollment	Current % of Capacity	Students Generated by Project	Projected Enrollment with Project	Projected % of Capacity	Over Capacity?
Oxnard School District	14,970	16,134	108%	491	16,625	111%	Yes
Oxnard Union High School District	15,234	17,091	112%	65	17,156	113%	Yes

Source: Oxnard School District School Facilities Needs Analysis, February 2012 and Oxnard Union High School Developer Fee Justification Study August 2020

Given that the project would put the OSD over capacity and OUHSD is currently operating over capacity, the increase in the student population associated with the proposed project would adversely affect school facilities at both districts if new facilities are not developed. However, as a condition of development, the developer would be required to pay the applicable required State-mandated school impact fees under the provisions of SB 50. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, with payment of school impact fees, potential impacts to schools resulting from the proposed project would be less than significant.

Within the OSD, the elementary and intermediate schools closest to the project area are Ritchen Elementary and Soria Elementary, both of which are approximately ½ mile from the project area, and Fremont Intermediate, which is approximately 0.35 miles from the project area. The OSD's "My School Locator" website indicates that residents along Teal Club Road just south of the project area are currently served by Ritchen Elementary and Fremont Intermediate. Soria is



currently operating at 109% of its capacity. Ritchen Elementary is currently operating at 87% of its capacity (see Table 4.11-3).

Further, a 25-acre site adjacent to the TCSP area has been approved by the Oxnard School District for development of an elementary school and middle school. Future students in the TCSP area would be served by these planned schools. In addition, the OUHSD is proposing a new high school (Del Sol High School) at Rose Avenue and Camino Del Sol approximately three miles from the project area.

The OSD provides bus service for students within the district who live greater than 1.5 miles from their assigned Grade Pre-K-6 school or two miles from their assigned Grade 7-8 school (OSD Transportation Services website, 2020). The OUHSD provides bus service for students within the district who live more than three miles from their assigned school site (OUHSD Transportation website, 2020). The project area is less than one mile from Ritchen Elementary School and Fremont Intermediate School, and approximately 1.2 miles from Oxnard High School. Additionally, with development of the schools adjacent to the TCSP area, travel distances to local elementary and middle schools would be reduced even further. The OSD and OUHSD would not be required to bus students from the project area to their schools.

The developer would be required to pay State-mandated school impact fees under the provisions of SB 50. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), payment of these fees is deemed full and complete mitigation. With payment of impact fees and with planned new schools that would serve the project, the project would not cause an increase in enrollment at local public schools that would exceed capacity and necessitate the construction of new or expanded facilities. The school district may choose to use these fees as it sees fit for school facilities and/or buses. Therefore, payment of school impact fees would reduce the potential impacts resulting from the proposed project to a less than significant level. Further, the project would not directly indirectly interfere with the operation of an existing or planned school. Please see Section 4.13 *Transportation and Circulation* for a discussion of proposed pedestrian amenities including paths and sidewalks, and a discussion of safe routes to schools from the project site.

Mitigation Measures. No mitigation is necessary. The applicable required State-mandated school impact fees would be collected at the time of building permit issuance.

Significance After Mitigation. Payment of the applicable State-mandated school impact fees is considered full mitigation for the proposed project's impacts under CEQA, and provision of a school site and development of a K-8 school within the TCSP area would alleviate overcrowding at local elementary and middle schools, although the proposed project could add to existing overcrowded conditions at Oxnard Union High School District schools.

c. Cumulative Impacts.

Housing, Population, and Employment. The cumulative impacts analysis for this EIR is based on the City's 2030 General Plan, adopted in September 2011, and its Draft Program Environmental Impact Report (DPEIR). The 2030 General Plan evaluated a population between 238,000 to 286,000 people by 2030, depending on household size and other factors. Currently



(2020), the City's population is 206,352 and with the estimated additional 3,909 new residents the project would not exceed the City's General Plan population buildout. The 2030 General Plan assumes Annexation and full development of the TCSP area and the additional Annexation area, including the associated population increases from housing and employment opportunities.

As discussed in Impact PEH-1, the TCSP is included in the City's 2030 General Plan, and the project's associated population, housing and employment generation is accounted for in the growth forecasts in the 2030 General Plan. Further, the Therefore, the proposed project's contribution to cumulative population and housing impacts would be within SCAG and City projections and would be less than significant.

Displacement of Housing and Population. Cumulative development would contribute to displacement and population growth in Oxnard. In accordance with the City's 2030 General Plan, cumulative development would accommodate a population within a range of 238,000 to 286,000 people in Oxnard by 2030, depending on household size and other demographic factors. The City of Oxnard 2030 General Plan Program EIR (certified 2011) did not analyze population and housing or displacement impacts specifically. However, the land uses proposed under the proposed project make up a part of the total development called for under the 2030 General Plan and were included in the development analyzed in the 2030 General Plan Program EIR. The proposed project is consistent with development of the project area and other cumulative projects already examined in the 2030 General Plan Program EIR. As discussed above, the proposed project would displace both of the two single-family residences in the TCSP area and the project area population supported by those residences. It may also displace the residences located on the nine parcels proposed for Annexation over time, should the residents choose to leave or the owners choose to redevelop with industrial uses. The eight residences involved would not constitute substantial displacement. Cumulative development projects throughout the City could similarly displace residences and populations. However, the proposed project would displace a relatively small number of residences and would add up to 990 housing units (net gain of 982 units), a substantial net gain for the City. Therefore, the project's contribution to cumulative impacts related to the displacement of people and housing would be less than significant.

Public Schools. Cumulative development would increase student enrollment at Oxnard schools. As discussed in Impact PEH-3 above, the proposed project would generate approximately 556 students. Even though the schools in the area are operating at near or above capacity, as projects are approved, they would be required to pay the full statutory fees allowed by the provisions of SB 50. With the collection of these fees for all new developments, cumulative impacts to schools would be mitigated to a less than significant level. Additionally, a potential elementary and middle schools site is planned for development by OSD and is located adjacent to the TCSP area, and a new high school (Del Sol High School) has been proposed at Rose Avenue and Camino Del Sol. If constructed, they would help to further mitigate cumulative impacts to educational facilities.



4.12 PUBLIC SERVICES AND RECREATION

This section evaluates the proposed project's potential impacts to fire protection services, police protection services, and parks and recreation facilities.

4.12.1 Setting

a. Fire Protection. The City of Oxnard Fire Department (OFD) provides fire prevention, fire suppression, and emergency services in Oxnard and coordinates the City's disaster preparedness program. The Fire Department also responds to chemical spills, injuries, and vehicle accidents, and is responsible for managing the City's records pertaining to hazardous material Risk Management and Prevention programs. The OFD also has mutual aid agreements with Ventura County and the City of Ventura for emergency assistance.

The OFD operates eight fire stations equipped with breathing apparatus, emergency medical supplies, tools, and fire-proof clothing. Each station is equipped with a fire engine. The closest fire station to the project area is Fire Station #1. On-duty staffing and equipment at each fire station is listed below.

Fire Station #1:

- Apparatus: Engine #61, Truck #61, Utility #60, Engine #161, Truck #161.
- Personnel: Captains 2, Engineers 2, and Firefighters 3.

Fire Station #2:

- Apparatus: Engine #62, Utility #62, Engine #162.
- Personnel: Captains 1, Engineers 1, and Firefighters 1.
- Secondary Focus: Drivers Training.

Fire Station #3:

- Apparatus: Engine #63, Engine #163.
- Personnel: Captain 1, Engineer 1, Firefighter 1.

Fire Station #4:

- Apparatus: Engine #64, Office of Emergency Services #396.
- Personnel: Captain 1, Engineer 1, Firefighter 1.
- Secondary Focus: Wildland Firefighting, High Rise.

Fire Station #5:

- Apparatus: Engine #65, Light and Air 65.
- Personnel: Captain 1, Engineer 1, Firefighter 1.

Fire Station #6:

- Apparatus: Engine #66, Ocean Rescue #66. Rescue Water Craft #66.
- Personnel: Captain 1, Engineer 1, Firefighters 3.
- Secondary Focus: Water Rescue.



Fire Station #7:

- Apparatus: Engine #67, HM (Hazardous Materials unit) #67.
- Personnel: Captain 1, Engineer 1, Firefighters1.
- Secondary Focus: Hazmat.

Fire Station #8:

- Apparatus: Engine #68, Battalion #61, USAR #68, Squad #68
- Personnel: Captain 1, Engineer 1, Firefighter 1.
- Secondary Focus: Training site, Urban Search and Rescue, Swift Water Rescue, Advanced Life Support (Paramedic)

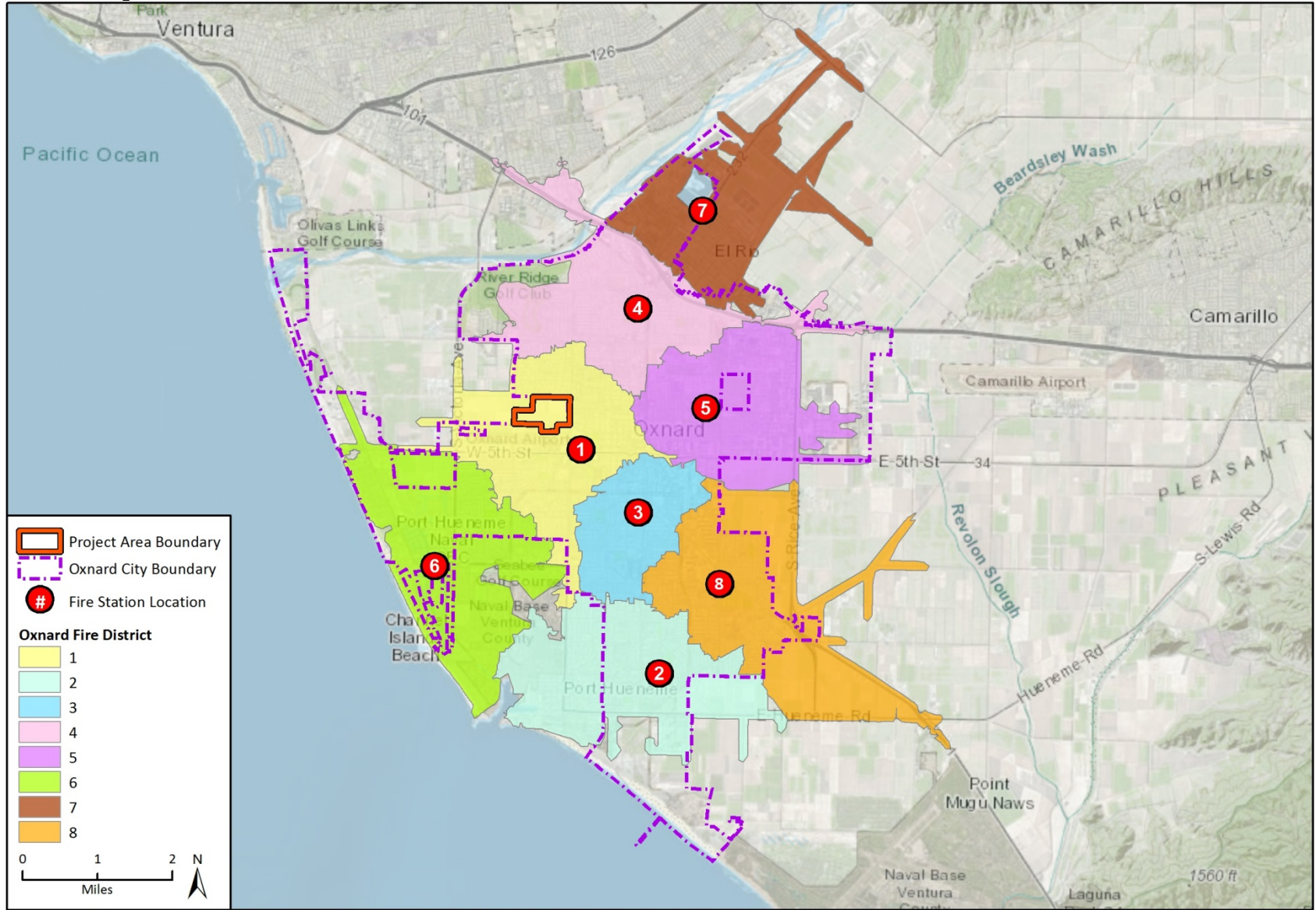
The OFD, among its 128 total staff, currently has 36 uniformed personnel (firefighters) on duty per day, which equates to 0.17 firefighters for every 1,000 people in the City, based on its current population of 206,352 (DOF 2020). The International City Managers Association recommends a ratio of 1 firefighter per 1,000 people (Rod Thorp, June 2012). The City is divided into eight overlapping response areas (see Figure 4.12-1). Each fire station has a primary service area in which its personnel respond to calls for service. Each station also has a secondary and tertiary response area to ensure adequate coverage of the City in case the primary engine is out on a call. Secondary response units are also dispatched to any structure fire along with the primary response unit. The OFD has identified a response time goal of four personnel on scene within five minutes for 90% of all structure fire responses, which is consistent with the National Fire Protection Association Standard 1710 response time goal. The OFD achieves the five minute response time goal 17.2% of the time. For medical calls, OFD arrives on the scene within 5 minutes, 54% of the time (Alex Hamilton, September 2019).

The OFD is also the Certified Unified Program Agency (CUPA) for the City of Oxnard. Senate Bill 1082, passed in 1993, created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which requires the administrative consolidation of six hazardous materials and waste programs (program elements) under one agency, called a CUPA. The program elements consolidated under the Unified Program are as follows:

1. *Hazardous Materials Inventory and Business Plan Program.*
2. *Hazardous Waste Generator.*
3. *Onsite Hazardous Waste Treatment (Tiered Permitting) Programs.*
4. *Underground Storage Tank (UST) Program.*
5. *Aboveground Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC) Program.*
6. *California Accidental Release Prevention (CalARP) Program.*



Figure 4.12-1 Response Areas for Fire Stations



Imagery provided by Microsoft Bing, Esri and their licensors © 2019. Additional data provided by City of Oxnard 2015.
 Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc.

Fig 4.12-1 Response Area Fire Stations



Under the Unified Program, application forms are standardized and consolidated, inspections are combined where possible, annual fees for each program element are merged into a single fee system, and enforcement procedures are made more consistent. The goal of the Unified Program is to create a more cohesive, effective and efficient program to address the management of hazardous materials. As part of this program, the State has assessed a service fee (surcharge) to fund their oversight activities; the local agency collects the surcharge for the state, but retains no portion of it. For more information on hazardous materials response, see Section 4.7, *Hazards and Hazardous Materials*.

b. Police Protection. Police protection services in Oxnard are provided by the City of Oxnard Police Department (OPD), which operates from the police station located at 251 South C Street. The station is located approximately 0.9 miles east of the project area. The City is divided into four Police Districts, each of which is further divided into smaller response beats (see Figure 4.12-2). Each beat is patrolled 24 hours a day, seven days a week in three overlapping 12-hour shifts. The project site is located in Beat 22, which is part of District 2. In addition to its police stations, the OPD operates eight storefront police substations.

The OPD currently has 249 sworn officers and 124 civil support personnel (Scott Swenson, OPD, pers. comm. 2019). With a 2020 population of 206,352 and 249 sworn officers, Oxnard's police officer to population ratio is currently 1.2 officers for every 1,000 persons.

The OPD's total calls for service in 2019 were 137,403 (Scott Swenson, 2019). Response times vary based on the type of call and the priority that each call is assigned when it is received. Response times start when a call is received in the dispatch center and entered into the Computer Aided Dispatch System. The clock continues to run until the first emergency unit arrives on scene. According to the most recent response time data available (2015), response times are the following (Cliff Waer, OPD, pers. comm. January 2015):

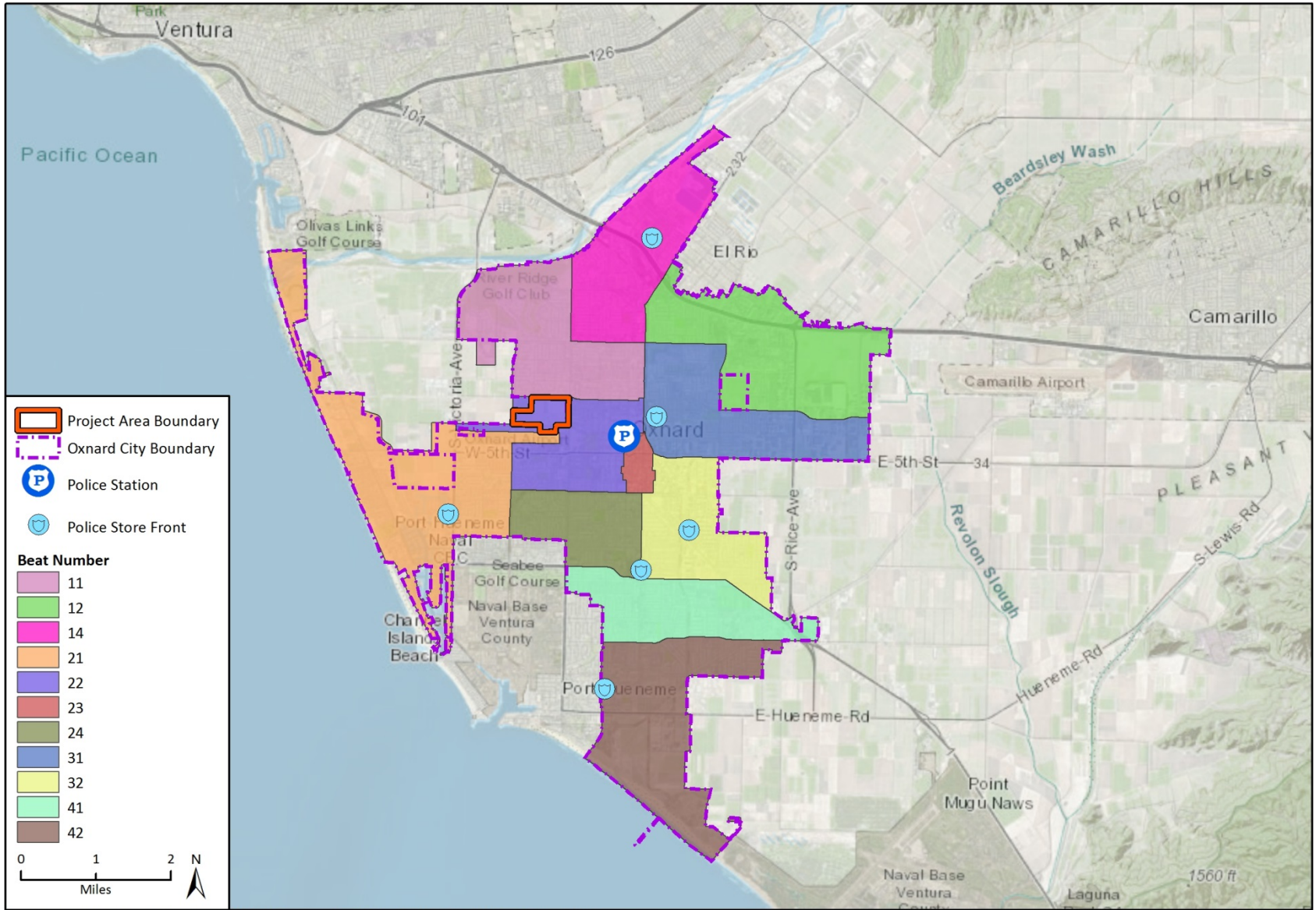
- Priority 1+ = 4.37 minute response time (Highest Priority).
- Priority 1 = 9.41 minute response time (Medium Priority).
- Priority 2 = 21.49 minute response time (Lowest Priority).

c. Parks. The City of Oxnard Parks Division is responsible for all municipally owned and operated park facilities within the City. The Department operates and maintains 523.42 acres spread over 58 parks and amenities which includes 36 ball diamonds 38 basketball courts and 8 playgrounds (City of Oxnard, 2020). There are also approximately 374 acres of beaches within the City¹ (City of Oxnard, 2011). With a 2020 population of approximately 206,352 residents (DOF, 2020), the City has a parkland to population ratio of 4.3 acres/1,000 residents. The City's standard for parkland to population ration is 3 acres/1,000 residents (Michael Henderson, City of Oxnard General Services Superintendent, pers. com., October 24, 2012). Table 4.12-1 lists park facilities within an approximately one-mile radius of the project area, including a list of selected features of each park. Figure 4.12-3 shows the location of these facilities in relationship to the project area.

¹ Beach acreage is based on an average of 300 feet in width.



Figure 4.12-2 Police Beats



Imagery provided by Microsoft Bing, Esri and their licensors © 2019. Additional data provided by City of Oxnard 2015.
 Project area boundary source: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc.

Fig 4.12-2 Police Beat Stations



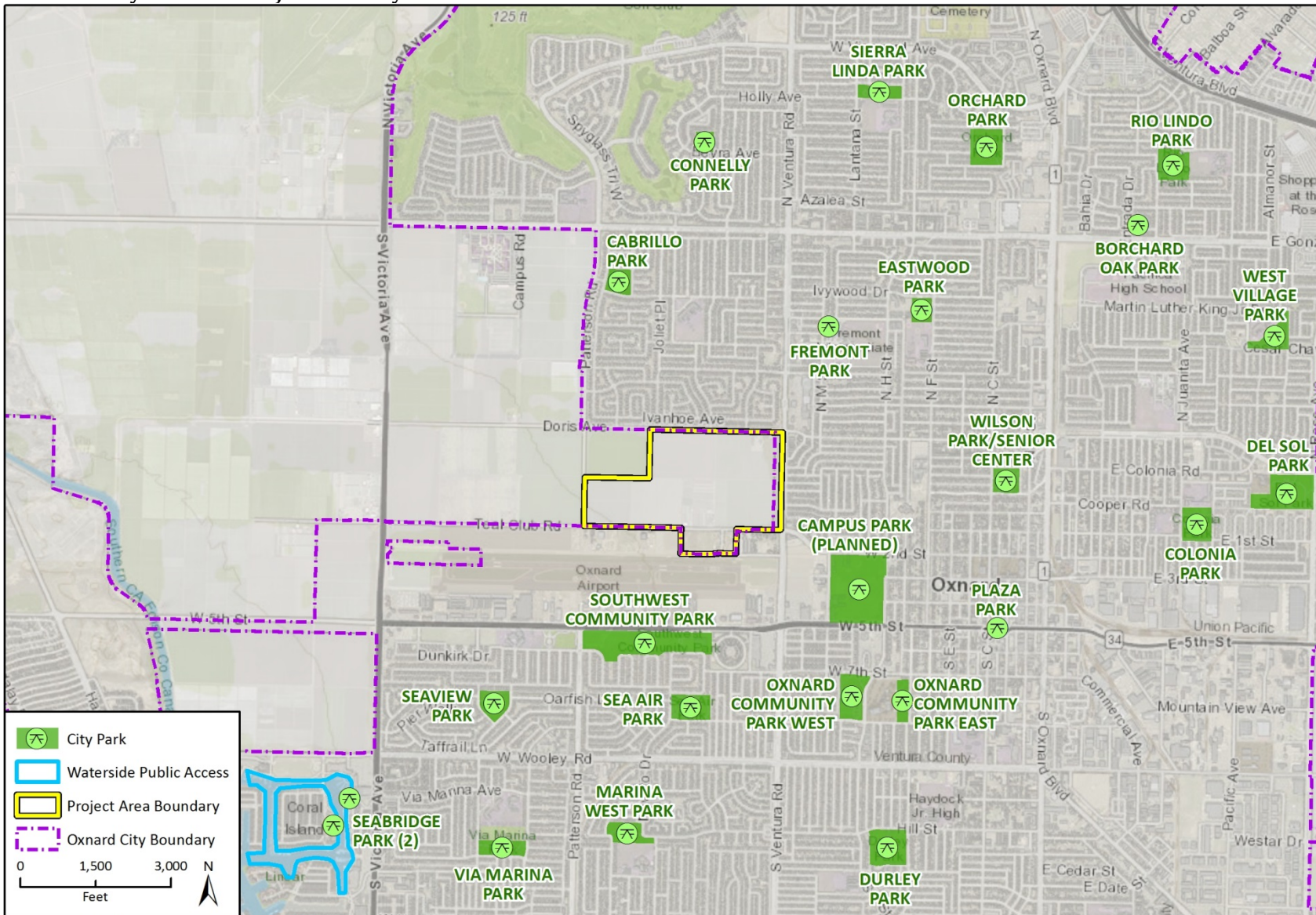
**Table 4.12-1
 City Parks in Project Vicinity**

Park Name	Acreege	Area Lighting	Ball Diamond	Basketball Court	Bleachers	Drinking Fountains	Exercise Stations	Horseshoes	Jogging Path	Off Street Parking	Group Picnic Area	Area for Reservation	Picnic Tables	Playground	Recreation Building	Restrooms	Shuffleboard	Soccer Field	Tennis Court	Volleyball	Concrete Walks	Dog Park
Cabrillo Park	6	*																			*	
Campus Park	30		3			*					*					*	*					
Community Center East Park	11	*		1		*		*		*	2	1	*	1	*	*					*	
Community Center West Park	4	*	2		*	*				*			*	1	*	*			8			
Connelly Park	3.1	*				*			*											1		
Durley Park	11	*	4	2	*	*				*			*	1	*	*					*	
Eastwood Park	4.2	*	2	1	*	*					*		*	1		*						
Fremont Tot Park	1.5					*							*	1							*	
Marina West Park	6.3	*				*							*	2		*			2		*	
Orchard Park	12.6	*		0.5		*					*		*	1		*			1		*	
Plaza Park	2	*				*															*	
Sea Air Park	8.6	*	1	1		*	*		*		*		*	1		*			1		*	
SeaBridge	13.6	*											*	1		*			2	1	*	
Sea View Park	6.4	*	1	1		*					*		*	2		*			2		*	
Southwest Community Park	26									*				1				2				
Southwest Community Park Extension	5.5	*		1		*	*		*				*	1				2				
Via Marina Park	12	*	1	1	*	*		*			*		*	1		*			1			

Source: City of Oxnard Spring 2020 Recreation Guide



Figure 4.12-3 City Parks in Project Vicinity



Imagery provided by Microsoft Bing and its licensors © 2019.

Project area boundary hand digitized from: TEAL CLUB SPECIFIC PLAN - EIR ALTERNATIVES SUMMARY (May 9, 2018 Update) – Development Planning Services, Inc. Additional data provided by City of Oxnard 2007.

Fig 4.12-4 City Parks



d. Libraries. The Oxnard Public Library (OPL) provides library services throughout the city at three locations: Downtown Main Library, South Oxnard Center Branch Library, and the Colonia Branch Library. The Main Library is the closest to the TCSP area approximately 1 mile east of the TCPS area. Overall, the OPL has nearly 400,000 items in its collection and approximately 95,560 square feet of library space (72,000 sf at the Downtown Main Library, 23,000 sf at the South Oxnard Branch Library and 560 sf at the Colonia Branch Library). The State of California library standards are a goal of 0.5 sf of library facility per resident. The 1996 American Association minimum standard for public library space was 0.6 sf per residing in the library's service area. In the 1990s, the ALA standard was increased to 1.0 sf per resident.

4.12.2 Impact Analysis

a. Methodology and Significance Thresholds. Information on current fire, police, and park facilities was collected from personal and written communication with the OFD and OPD, personnel as well as from the City's 2030 General Plan. In accordance with the City of Oxnard 2017 CEQA Guidelines, a significant impact could occur if a project would:

- 1) *Increase demand for fire protection service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects;*
- 2) *Increase the demand for law enforcement service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects;*
- 3) *Increase the use of existing park facilities such that substantial physical deterioration of the facilities would occur or be accelerated or that new or expanded park facilities would be needed to maintain acceptable service levels; or*
- 4) *Increase the use for or use of existing library or other community facilities such that substantial physical deterioration of the facilities would occur or be accelerated.*

The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.12-2 lists the thresholds under consideration in the public services analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).



**Table 4.12-2
 Summary of Public Services Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Increase demand for fire protection service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?		X		
2. Increase the demand for law enforcement service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?		X		
3. Increase the use of existing park facilities such that substantial physical deterioration of the facilities would occur or be accelerated or that new or expanded park facilities would be needed to maintain acceptable service levels?			X	
4. Increase the use for or use of existing library or other community facilities such that substantial physical deterioration of the facilities would occur or be accelerated?			X	

Impact PS-1 The proposed project would incrementally increase demands on the Oxnard Fire Department. This increase would affect the personnel, equipment, and the organization of the Fire Department. This would be a Class II, significant but mitigable, impact.

Development of the project area would incrementally increase demand for fire protection and emergency response services above and beyond current on-site conditions. With buildout of the TCSP, calls for service are expected to be typical of residential, commercial, and business park uses, and would include calls for structure fires, garbage bin fires, car fires, electrical fires, and emergency medical response. With buildout of the additional Annexation area, calls for service are expected to be typical of light industrial uses and would also include calls for structure fires, electrical fires, and emergency medical response.

The City of Oxnard Fire Department has prepared a *Fire Protection Planning Guide* (2015), which is a compilation of general development requirements for fire prevention and protection measures. All new development within the City must comply with the requirements of this guide, and new development is subject to a detailed review by Fire Department staff to ensure such compliance. The *Fire Protection Planning Guide* includes access requirements for fire apparatus and firefighting; fire protection requirements for fire sprinklers, fire hydrants, fire flow, hydrant spacing, and fire department connections; protective signaling systems; and hazardous materials. The proposed project would be required to install automatic fire sprinklers per OFD requirements and comply with all fire safety regulations outlined in the Uniform Fire Code. The proposed project would be subject to the City's Growth Requirement Capital Fee, which requires that new construction pay fees per dwelling unit or per 1,000 building square foot of non-residential space that would fund improvements and expansions to fire facilities.



The Fire Department can also require additional fire prevention measures during review of development plans. Along with required implementation of measures in the *Fire Protection Planning Guide*, the Fire Department has indicated that development of the proposed project would require development of a fire station, a fire engine, and staff to provide fire/emergency services to the project area, and that a Community Facilities District would be required to offset associated staffing costs (Rod Thorp, 2019). These requirements have been incorporated into Mitigation Measure PS-1, discussed below.

Impacts related to response times, staffing, and fire hydrants are discussed below.

Response Times. Fire Station 1, located at 491 South K Street, would be the primary response unit for fire emergencies within the project area under the proposed project. This Fire Station is approximately 0.5 miles away from the closest part of the project area and approximately 1.6 miles away from the most distant portion of the project area. Estimated total response time for this area is 5 minutes² (Rod Thorp, July 2012). The OFD has identified a response time goal of five minutes for 90% of all emergency responses, which is consistent with the National Fire Protection Association Standard 1710 response time goal. The OFD achieves the five minute response time goal 17% of the time (Alex Hamilton, September 2019). Because the project area is within the OFD's preferred 5-minute response radius from the Fire Station 1, impacts associated with response times would be less than significant.

Staffing. In the City of Oxnard there are currently a total of 36 uniformed firefighters that serve a population of 206,352, which equates to approximately 0.17 firefighters for every 1,000 people. This is below the City of Oxnard's standard of one firefighter for every 1,000 people. The proposed development would incrementally increase the population of the City, thus exacerbating the existing service ratio deficiency. This is a potentially significant impact.

Funding for additional staffing is allocated to the Fire Department through the City's budget process and is not directly tied to individual development projects. The growth of the City over time, including growth associated with the proposed project, will require that increased funding be allocated to the Fire Department to maintain adequate levels of service and service ratios. The project's share of this funding would be provided through Mitigation Measure PS-1, discussed below. Implementation of Mitigation Measure PS-1 would mitigate staffing impacts related to the proposed project's contribution to the overall staff deficiency in the City.

Fire Flows. The proposed project would also be required to maintain minimum water flows through fire hydrants to provide sufficient water to firefighters during an emergency. Fire flow is defined as the amount of water required, above and beyond domestic needs, to extinguish a fire in a structure and which should be available during peak water demand periods. It is the City's policy not to permit new development unless there is adequate water supply and pressure to serve the fire flow needs of the project. Before development of any phase of the proposed project, the developer of that phase would be required to demonstrate that it would meet this requirement, which would help ensure that there would be adequate

² Response time is reported as "total time to respond," which includes "reaction time" plus the "response time".



water supply and pressure to serve the proposed project. Therefore, impacts relating to fire flows would be less than significant.

Mitigation Measures. The developer would be required to incorporate measures identified in the *Fire Protection Planning Guideline* and Fire Code requirements such as automatic sprinklers, fire hydrants, and adequate water flows, as well as project-specific measures required during final Fire Department review of proposed projects built out under the TCSP and in the additional annexation area, into final site and building plans. Building plans would be subject to review and approval by the Fire Department. In addition, the following measure is proposed to reduce impacts associated with equipment and facilities needs to a less than significant level.

PS-1 New Fire Equipment and Staffing. The developer shall provide sufficient proportional funding for development of an additional fire station, fire engine, and staff to provide fire/emergency services to the project area. The City of Oxnard shall create a Community Facilities (Mello Roos) District within the project area to offset proportional associated staffing costs. Mitigation shall be in place and operational prior to occupancy to be determined by the Oxnard Fire Department.

Significance After Mitigation. Mitigation Measure PS-1 has been included to ensure that the City has the appropriate funding to staff and serve the proposed project. Implementation of the mitigation measures identified above would reduce impacts associated with fire protection to a less than significant level.

Impact PS-2 The proposed project would incrementally increase demands on the Oxnard Police Department, which could adversely affect the Police Department. This would be a Class II, significant but mitigable impact.

Development of the proposed project would incrementally increase the demand for police services in the area. The project area is within the service area of the OPD. The proposed project includes a residential component that would increase the onsite population, reduce the citywide officer-to-population ratio, and increase the number of service calls. While there is not a directly proportional relationship between increases in development and land use activity and increases in demand for police protection services, the number of request for assistance calls for police response to burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the buildout of the project area. Based on the most recently available data, the OPD estimates that the proposed project's projected population increase of up to 3,909 people would generate approximately 2,200 new service calls per year (most service calls are for paramedic services), and that, with the average patrol officer handling 1,100 calls per year, an increase of two officers would be required to accommodate these new service calls (Scott Swenson, personal communication, 2019).

However, as with firefighting personnel, funding for additional staffing is allocated to the OPD through the City's budget process and is not directly tied to individual development projects. The proposed project would be subject to the City's Growth Requirement Capital Fee, which



requires that new construction pay fees per dwelling unit or per 1,000 building square foot of non-residential space that would fund improvements and expansions to police facilities. The growth of the City over time will require that increased funding be allocated to the OPD to maintain adequate levels of service and service ratios. Provided that additional funding is made available to the OPD to support new personnel as expected, the proposed project would not significantly affect police protection service standards. Nonetheless, because the OPD estimates that two additional officers would be needed to service the Plan Area, this impact would be potentially significant.

Response times vary based on the type of call and the priority that each call is assigned when it is received. Response times start when a call is received in the dispatch center and entered into the Computer Aided Dispatch System. The clock continues to run until the first emergency unit arrives on scene. In Oxnard, Priority 1+ has a response time of 4:37 minutes, Priority 1 has a response time of 9:41 minutes, and Priority 2 has a response time of 21:49 minutes. All response times are reported as “total time to respond,” which includes “reaction time” plus “response time”. The most common incidents requiring police response at largely residential developments like the proposed project tend to be petty or property related crimes such as theft, burglary, graffiti, auto theft, code violations, family disputes, alarm calls, and others (Jeri Williams, Chief of Police, Oxnard Police Department, personal communication, July 2012).

The OPD is actively involved in the City’s Development Design Review process and sits on the City’s Development Advisory Committee to provide crime and safety recommendations to all developments. The OPD recommends implementation of CPTED (Crime Prevention Through Environmental Design) strategies in order to ensure the project’s design does not negatively impact the community (Jeri Williams, Chief of Police, Oxnard Police Department, personal communication, July 2012). Unless appropriate CPTED-type crime prevention design features are incorporated into project design, this impact would be potentially significant.

Mitigation Measures. The following mitigation measures would reduce impacts to police services to a less than significant level.

- PS-2(a) Oxnard Police Department Consultation.** Prior to approval of individual Development Design Review permits, the developer shall work closely with the Oxnard Police Department prior to the final design of the project to ensure the development of adequate security measures for the construction and occupancy stages of development. Such measures shall include, but are not limited to the following:
- Compliance with Oxnard Police Department recommendations relative to building design, site design, visibility, access, graffiti control, landscaping, security lighting, doors, locks and other relevant factors in the preparation of the final plans.
 - The Oxnard Police Department shall be included in the plan check process to enable the Department to recommend specific improvements that will enhance crime prevention for the



project and allow for the police to better plan for calls that may be generated by the development.

- Implement fencing and security measures during the construction phase. The City of Oxnard Police Department shall approve security measures.

PS-2(b) New Police Staffing. The developer shall provide sufficient proportional funding for development of additional police staffing to provide police protection services to the project area. The City of Oxnard shall create a Community Facilities (Mello Roos) District within the project area to offset proportional associated staffing costs. Mitigation shall be in place and operational prior to occupancy to be determined by the Oxnard Police Department.

Significance After Mitigation. Impacts to police protection services would be less than significant with implementation of the above mitigation measures.

Impact PS-3 The proposed project would both incrementally increase demand for, and incrementally increase demands on, local recreational facilities. The proposed project includes 17.8 acres of parks and open space that would more than satisfy the additional park demand generated by future TCSP residents. This impact would be Class III, less than significant.

The City of Oxnard has adopted a parkland threshold which requires 3 acres of parkland for every 1,000 residents in an area. Currently the City of Oxnard contains approximately 897 acres of parkland and beaches (City of Oxnard Spring 2020 Recreation Guide, 2020; City of Oxnard, 2011). The current population for the City of Oxnard is 206,352, putting the parkland to population ratio at 4.3 acres per 1,000 residents. This is over the requirement set by the City of Oxnard.

It is anticipated that the proposed project would bring approximately 3,898 new residents to the area, which would require approximately 12 acres of parkland according to the 3 acres per 1,000 residents standard. The project proposes 17.8 acres of parkland and open space (including both parks and parkways). This would exceed the required 12 acres of parkland, and would bring the City's parkland and beach total to approximately 915 acres and its parkland ratio to 4.35 acres per 1,000 residents. This would improve the parkland ratio for the City of Oxnard, which would have a beneficial impact on the availability of parklands in the City. Therefore, at full buildout, the project would have a beneficial impact in this regard.

Phase 1 of the TCSP involves development of 1.5 acres of linear parkland along Teal Club Road and Ventura Road. Therefore, because the majority of parkland proposed would be developed subsequent to development of the Phase 1 TCSP housing, there may be insufficient recreational facilities to serve the Phase 1 residents in between when the housing is occupied and the park is built. However, during operation of Phase I, residents would be able to access the proposed Phase I parkland as well as existing parks in the adjacent neighborhoods and throughout the city. Further, the future development under the proposed project would be subject to the City's



Parks and Recreation Fee, which requires that new construction pay fees per dwelling unit or per 1,000 building square foot of non-residential space that would fund improvements and expansions to park and recreation facilities. Overall, impacts would be less than significant.

Mitigation Measures. No mitigation is required.

Significance after Mitigation. Impacts would be less than significant without mitigation.

Impact PS-4 The proposed project would incrementally increase the demand for library services but would not cause substantial physical deterioration of such facilities. This impact would be Class III, less than significant.

As discussed in the setting, the most recent ALA standard for library space is 1.0 sf per resident and the OPL has approximately 95,560 square feet of library space. The current population of Oxnard is an estimated 206,352; therefore, the City is below the ALA goal of 1.0 sf per resident. Currently, the City has approximately 0.46 sf per resident. The proposed project would add an estimated 3,909 new residents. Assuming a goal of 1.0 sf per resident that would equate to 3,909 sf. With the proposed project, the ratio of library square feet per resident would be approximately 0.45 sf per resident. Although the project would also introduce new employees, in general, employees are not likely to patronize libraries during working hours, as they are more likely to use libraries near their homes during non-work hours.

The proposed project would only incrementally affect the overall ratio of library sf per resident. Further, the proposed project would be subject to the City's Growth Requirement Capital Fee, which requires that new construction pay fees per dwelling unit or per 1,000 building square foot of non-residential space that would fund improvements and expansions to government facilities and cultural and recreational facilities such as libraries.

As discussed, in Section 4.11, *Land Use and Planning*, the TCSP was anticipated in the City's General Plan. The General Plan includes goals and policies to support the City's public library system by developing funding, expanding library services, and expanding online access. It is not anticipated that the project would increase the use of existing libraries such that substantial physical deterioration of the facilities would occur or be accelerated. Should the City determine that future expanded library facilities are needed, new or expanded library facilities would be subject to CEQA environmental analysis and any identified mitigation measures required to avoid, minimize, or reduce any identified environmental effects. This impact would be less than significant.

Mitigation Measures. No mitigation is required.

Significance after Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts. As discussed in Section 3.0, *Environmental Setting*, cumulative development within the City of Oxnard includes buildout in accordance with the City's 2030 General Plan which accommodates a population between 238,000 and 236,000 people by 2030. The City's 2030 General Plan Program EIR (certified 2011) found that impacts associated with



implementation of the General Plan related to law enforcement service, fire protection service, parks and recreation facilities, and library facilities, would be less than significant.

Fire Protection. Cumulative development would increase demands on fire protection services by adding residents and generating additional traffic that would hinder emergency response. Without increases in staffing and facilities correlating to these population increases, potentially significant impacts could occur. As discussed in Impact PS-1 above, the proposed project would not significantly impact responses times or staffing with implementation of Mitigation Measure PS-1. Subsequent projects would need to be analyzed on a case-by-case basis to ensure their design allows them to be adequately served by the OFD. Funding for the OFD comes from the City's General Fund. Provided that the City allocates funds to the OFD in proportion to the population and its service obligations, no significant cumulative impacts would occur. The environmental effects of any future facility expansions would need to be evaluated and mitigated, if necessary, prior to the implementation of such facilities. Therefore, the proposed project's contribution to cumulative impacts to fire protection services would not be cumulatively considerable.

Police Protection. Cumulative development would increase demands on police protection services by adding both residents and a daytime population, and by increasing traffic that would hinder emergency response. Without increases in staffing and facilities correlating to these population increases, potentially significant impacts could occur. Subsequent projects would need to be analyzed on a case-by-case basis to ensure their design allows them to be adequately served by the OPD. Funding for the OPD comes from the City's General Fund. Provided that the City allocates funds to the OPD in proportion to the population and its service obligations, no significant cumulative impacts would occur. The environmental effects of any future facility expansions would need to be evaluated and mitigated, if necessary, prior to the implementation of such facilities. Therefore, the proposed project's contribution to cumulative impacts to police protection services would not be cumulatively considerable.

Parks and Recreation. Cumulative development would increase demands on parkland within the City and impact the City's parkland to population ratio. As discussed under Impact PS-3, the proposed project would add parkland and would improve the City's parkland to population ratio. Therefore, the proposed project would have a beneficial effect and the proposed project would not contribute to cumulative impacts to park and recreation facilities.

Libraries. Cumulative development would increase demands on library services. As discussed under Impact PS-4, the project is anticipated under the City's General Plan EIR, which found that impacts related to library services would be less than significant with implementation of goals and policies in the City's General Plan. Therefore, the proposed project would not contribute to a cumulative impact on library facilities.



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4.13 TRANSPORTATION AND TRAFFIC

This section assesses the impacts of the proposed TCSP and development of the additional Annexation area on traffic conditions in the project vicinity. The analysis in this section is based on the traffic impact study prepared for the project by Stantec in September 2014 and updated in May 2015 and in December 2019. The full updated study is included in this EIR as Appendix I.

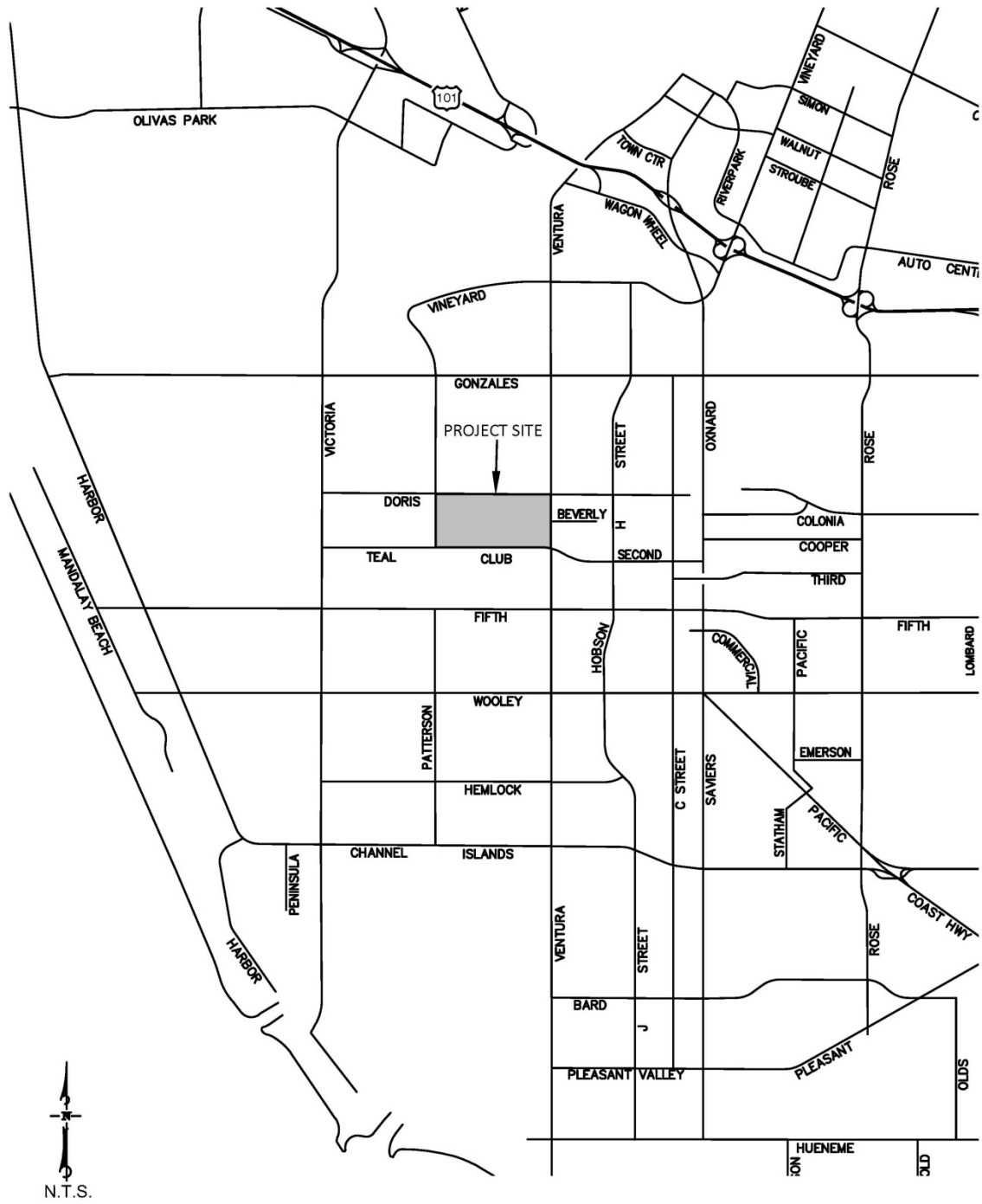
4.13.1 Setting

a. Existing Roadway System. Figure 4.13-1 shows the local street system, and the following describes the major roadways serving the project study area:

- 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. Highway 101 to the project site is provided via the interchanges with Victoria Avenue, Ventura Road and Oxnard Boulevard.
- *Doris Avenue:* This is a three-lane east-west local arterial with one lane eastbound and two lanes westbound adjacent to the project site. The intersections with Victoria Avenue and Ventura Road are signalized, all other intersections are controlled with stop signs on the side streets.
- *Fifth Street:* This thoroughfare is the principal east-west street serving the Central Business District of the City and the mid-City region on both the east and west sides of Oxnard. It is currently designated State Route 34 east of Rice Avenue. Fifth Street functions as a secondary arterial except for the segments from Victoria Avenue to H Street and Oxnard Boulevard to Rose Avenue, which presently function as primary arterials.
- *Gonzales Road:* This road is a main east-west thoroughfare that serves the central and north central portions of the City of Oxnard. This roadway presently extends from Harbor Boulevard to Rice Avenue. Gonzales Road serves as a primary arterial over its length except from Victoria Avenue to Harbor Boulevard, where it functions as a local arterial. Primary arterials have a recommended right-of-way width of 120-feet. This can be larger based on landscaping requirements of the TCSP.
- *Oxnard Boulevard:* This roadway is one of the principal entrances into the City of Oxnard. It is also the principal north-south access to the Central Area, and continues southerly through the “Five Points” intersection to southeast commercial and residential areas. Its location in the center of the City has led to its functioning as a primary arterial. North of the Ventura Freeway (U.S. 101) it terminates as a collector street in the Riverpark residential development.



Figure 4.13-1 Existing Street Network and Project Location



- *Patterson Road*: This local arterial, which has a gap at the Oxnard Airport, provides access to residential neighborhoods in the northwest and southwest areas of Oxnard. In addition, Patterson Road provides access to the Oxnard Airport, the City of Port Hueneme and the U.S. Navy Construction Battalion Center.
- *Teal Club Road*: This local arterial would provide direct access to the project site, and has future plans to expand to secondary arterial.
- *Ventura Road*: This four to six-lane north-south primary arterial provides access to the west side of the City. To the south, the road serves the City of Port Hueneme, the U.S. Navy Construction Battalion Center and to a lesser degree the current Hueneme Road industrial area. Ventura Road also extends north of Vineyard Avenue, and terminates in the Riverpark area.
- *Victoria Avenue*: This is an important four to six-lane north-south arterial street in west Oxnard, which provides a crossing of the Santa Clara River for connection with the County Government Center in east Ventura. The southern terminus is in the Silver Strand area.
- *Wooley Road*: This is a major east-west thoroughfare that provides access to the residential community in the southwest portion of the City, to the central area of Oxnard, and to the Central Industrial Area. This road functions as a secondary arterial but is affected by the presence of the rail lines belonging to the Ventura County Railway as well as operational limitations of the “Five Points” intersection.

b. Study Area. Twenty-five intersections have been identified and investigated as potentially impacted by the proposed project. These intersections are as follows:

1. Victoria Ave & US 101 NB Ramps
2. Victoria Ave & Valentine Rd
3. Victoria Ave & Olivas Park Rd
4. Victoria Ave & Gonzales Rd
5. Victoria Ave & Doris Ave
6. Victoria Ave & Teal Club Rd
7. Victoria Ave & Fifth St
8. Victoria Ave & Wooley Rd
9. Patterson Rd & Gonzales Rd
10. Patterson Rd & Doris Rd
11. Patterson Rd & Teal Club Rd
12. Ventura Rd/ Town Center Dr
13. Ventura Rd/ Wagon Wheel Dr
14. Wagon Wheel Dr / U.S. 11 SB Off
15. Ventura Rd & Vineyard Ave
16. Ventura Rd & Gonzales Rd
17. Ventura Rd & Doris Ave
18. Ventura Rd & Beverly Dr
19. Ventura Rd & Teal Club/Second Street



- 20. Ventura Rd & Fifth Street
- 21. Ventura Rd & Wooley Rd
- 22. Oxnard Blvd & Town Center Dr
- 23. Oxnard Blvd & US 101 NB Ramps
- 24. Oxnard Blvd & US 101 SB Ramps
- 25. Oxnard Blvd & Gonzales Rd

c. Existing Conditions. Peak hour intersection vehicle turning movement and average daily traffic (ADT) counts were obtained in May 2018. The performance criteria used for evaluating traffic volumes and roadway capacities are based on the City of Oxnard standards of Intersection Capacity Utilization (ICU) methodology for calculating Level of Service (LOS) values at signalized intersections during the AM and PM peak hours. For Caltrans intersections and unsignalized intersections, the delay-based methodology as contained in the Highway Capacity Manual (HCM) was also used.

The term "Level of Service" (LOS) is used by traffic engineers to estimate the level of congestion generally accepted by drivers and to grade the stability of traffic flow. The ICU methodology defines LOS as the volume to capacity (V/C) ratio at an intersection. This is typically used to describe the percentage of capacity utilized by existing or projected traffic at an intersection. Under the HCM methodology, LOS at intersections is defined as a function of the average overall wait time for a vehicle to pass through the intersection. In this way, LOS can be quantitatively measured at any intersection. Table 4.13-1 summarizes LOS definitions.

**Table 4.13-1
 Level of Service Descriptions**

LOS	Description	HCM Delay per Vehicle (sec)		ICU Volume/ Capacity (V/C) Ratio
		Signalized	Unsignalized	
A	Conditions of free unobstructed flow, no delays and all signal phases sufficient in duration to clear all approaching vehicles.	< 10.0	< 10.0	< 0.60
B	Conditions of stable flow, very little delay, a few phases are unable to handle all approaching vehicles.	10.0 – 20.0	10.0 – 15.0	0.61 - 0.70
C	Conditions of stable flow, delays are low to moderate, full use of peak direction signal phases is experienced.	20.0 – 35.0	15.0 – 25.0	0.71 - 0.80
D	Conditions approaching unstable flow, delays are moderate to heavy, significant signal time deficiencies are experienced for short durations during the peak traffic period.	35.0 – 55.0	25.0 – 35.0	0.81 - 0.90
E	Conditions of unstable flow, delays are significant, signal phase timing is generally insufficient, congestion exists for extended duration throughout the peak period.	55.0 – 80.0	35.0 – 50.0	0.91 - 1.00
F	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.	> 80.1	> 50.0	> 1.00

V/C = volume-to-capacity; LOS = level of service

Source: Highway Capacity Manual 6th Edition: A guide for Multi-Modal Mobility Analysis, Transportation Research Board, 2016, Transportation Research Board, National Research Council.



Existing Levels of Service. Table 4.13-2 summarizes the existing AM and PM peak hour LOS at each of the study intersections in existing conditions. Existing intersection geometries and existing AM and PM peak hour traffic volumes are shown in Figure 4.13-2. According to the *Guidelines for CMP Traffic Impact Analysis Reports in Ventura County* and City criteria, LOS C is considered the minimum acceptable LOS for an intersection in Oxnard. LOS D is the minimum City of Ventura standard. Caltrans has established the cusp of the LOS C/D range as the target level of service standard for their facilities.

As shown in the table, the majority of intersections within the City of Oxnard operate at the City's acceptable LOS C during both peak hours in existing conditions. The Victoria Avenue/Teal Club Road intersection and Ventura Road/Beverly Drive intersection, which are unsignalized, operate below the City's LOS C standard.

d. Existing Public Transit. Public transportation in the Oxnard area is provided by Gold Coast Transit, created in 1973 by a joint powers merger of the Oxnard and Ventura municipal bus systems. Gold Coast Transit Route 4A (Gonzales Road - North Oxnard) and 4B (St. John's - Gonzales Road) currently provide transit service in the vicinity of the project area with bus stops located at Doris Avenue and M Street approximately 0.15 miles east of the project site. In addition, Gold Coast Transit Routes 21 (Pacific View Mall - Victoria Avenue - C Street), 19 (Fifth Street - Victoria Avenue - Gonzales Road) and 20 (Rice Avenue - Gonzales Road - Fifth Street) provide transit service along Victoria Avenue with bus stops at Victoria Avenue and Fifth Street and Victoria Avenue a little over one mile west of the project site.

The City also provides a "dial-a-ride" transit service for elderly and handicapped residents. The service is well utilized and provides valuable transportation for essential purposes (medical and shopping).

e. Existing Pedestrian Facilities. Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. As the project area is currently used for agricultural operations, there are no pedestrian sidewalks around or within the project area. There are pedestrian sidewalks on the east side of Ventura Avenue across the street from the project area and on the north side of Doris Avenue across the street from the project site.

f. Existing Bicycle Facilities. Bikeway planning and design in California, including the Oxnard 2030 General Plan, typically relies on guidelines and design standards established by Caltrans in the Highway Design Manual (Chapter 1000: Bikeway Planning and Design). Caltrans provides for three distinct types of bikeway facilities, as described below and shown on the accompanying figures.

- *Class I Bikeways (Bike Paths)* provide a completely separate right-of-way and are designated for the exclusive use of bicycles and pedestrians with vehicle and pedestrian cross-flow minimized. In general, bike paths serve corridors not served by streets and highways or where sufficient right-of-way exists to allow such facilities to be constructed away from the influence of parallel streets and vehicle conflicts.



**Table 4.13-2
Existing Intersection Conditions**

Intersection	AM Peak Hour			PM Peak Hour		
	ICU V/C Ratio	HCM	LOS	ICU V/C Ratio	HCM	LOS
1. Victoria Ave & US 101 NB Ramps*	--	21.4 sec	C	--	20.4 sec	C
2. Victoria Ave & Valentine Rd**	0.55	--	A	0.68	--	B
3. Victoria Ave & Olivas Park Rd**	0.70	--	B	0.72	--	C
4. Victoria Ave & Gonzales Rd	0.74	--	C	0.75	--	C
5. Victoria Ave & Doris Ave	0.82	--	D	0.78	--	C
6. Victoria Ave & Teal Club Rd (TWS)	---	>50.0	F		50.0	F
7. Victoria Ave & Fifth St	.67	--	B	0.53	--	A
8. Victoria Ave & Wooley Rd	0.65	--	B	0.60	--	A
9. Patterson Rd & Gonzales Rd	0.60	--	A	0.44		A
10. Patterson Rd & Doris Rd (AWS)	--	13.2 sec	B	--	10.5 sec	B
11. Patterson Rd & Teal Club Rd (TWS)	--	10.2 sec	B	--	9.9 sec	A
12. Ventura Rd/ Town Center Dr	0.30	---	A	0.45	---	A
13. Ventura Rd/Wagon Wheel Dr	0.53	---	A	0.50	---	A
14. Wagon Wheel Dr/ U.S. 101 SB Off (CT)	---	7.6	A	--	7.0	A
15. Ventura Rd & Vineyard Ave	0.47	--	A	0.48	--	A
16. Ventura Rd & Gonzales Rd	0.63	--	B	0.65	--	B
17. Ventura Rd & Doris Ave	0.76	--	C	0.76	--	C
18. Ventura Rd & Beverly Dr (TWS)	--	29.7 sec	D	--	44.9 sec	E
19. Ventura Rd & Teal Club	0.74	--	C	0.75	--	C
20. Ventura Rd & Fifth St	0.63	--	B	0.62	--	B
21. Ventura Rd & Wooley Rd	0.74	--	C	0.71	--	C
22. Oxnard Blvd/Town Center Dr	0.53	---	A	0.52	---	A
23. Oxnard Blvd/U.S. 101 NB Ramps (CT)	--	22.2	C	--	26.9	C
24. Oxnard Blvd/ U.S. 101 SB Ramps (CT)	--	18.8	B	--	19.5	B
25. Oxnard Blvd & Gonzales Rd	0.65		B	0.68		B

* Caltrans Controlled (HCM methodology)

** City of Ventura

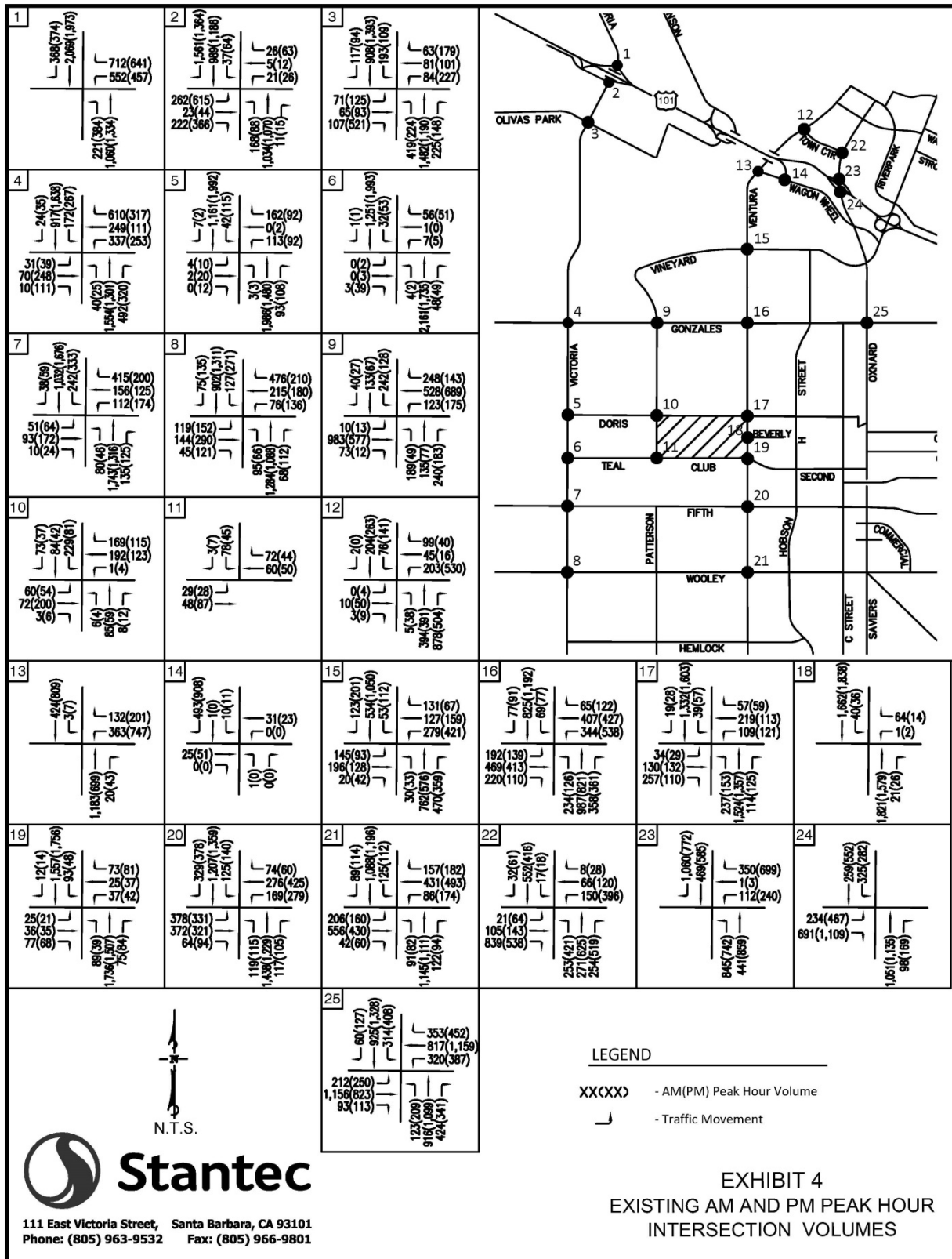
sec = average vehicle delay (in seconds) per vehicle, AWS = All-Way Stop, TWS = Two-Way Stop, CT = Caltrans controlled intersection, bolded values exceed LOS Standard.

Caltrans intersections and unsignalized intersections analyzed using the HCM methodology. LOS determined by vehicle delay in seconds.

Source: Stantec, 2019



Figure 4.13-2 Existing AM and PM Peak Hour Traffic Volumes



- *Class II Bikeways (Bike Lanes)* are lanes for bicyclists generally adjacent to the outer vehicle travel lanes. These lanes have special lane markings, pavement legends, and signage. Bicycle lanes are generally five (5) feet wide. Adjacent vehicle parking and vehicle/pedestrian cross-flow are permitted.
- *Class III Bikeways (Bike Routes)* are designated by signs or pavement markings for shared use with pedestrians or motor vehicles, but have no separated bike right-of-way or lane striping. Bike routes serve either to: a) provide continuity to other bicycle facilities, or b) designate preferred routes through high demand corridors.

According to Figure 4-6 of the Oxnard 2030 General Plan Background Report (April 2006), Ventura Road adjacent to the project area is an identified bicycle and pedestrian route. As mentioned above, Ventura Road is planned to be widened as envisioned in the 2030 General Plan, including on-street bike lane striping.

Doris Avenue between Patterson Road and Ventura Road was resurfaced in July 2014. As a result of that resurfacing, westbound Doris Avenue was striped with two lanes plus a bicycle lane and a planted median with street lights between Coronado Place and Waverly Court.

Construction of the Teal Club will result in provision of Class II bike lanes on Patterson Road, Doris Avenue, Teal Club Road and Ventura Road adjacent to the Specific Plan area as well as an internal Class I route along Beverly Drive. There are no other dedicated bicycle facilities provided in the vicinity of the project site.

g. Regulatory Setting. The City of Oxnard requires payment of a Traffic Impact Fee for new development based on the traffic increases resulting from each project. The funds accumulated by the City through assessment of these fees are earmarked for improvements to the City's transportation network, including arterial roads and intersections.

The County of Ventura also administers a traffic impact mitigation fee program to address the cumulative adverse impacts of development on the County's road network. Because the City of Oxnard currently has a reciprocal agreement with the County, the project developer would be required to pay a County fee to mitigate for project related contributions to the regional road network.

4.13.2 Impact Analysis

a. Methodology and Thresholds of Significance. The analysis is based upon a traffic study prepared for the proposed project by Stantec in March 2019. This analysis focuses on traffic associated with the proposed TCSP. Pursuant to the City's 2017 CEQA Thresholds and City traffic impact study requirements, the traffic analysis includes the following traffic scenarios:

1. Existing Conditions
2. Existing plus Project Conditions
3. Cumulative (Existing plus approved and pending projects) Conditions
4. Cumulative plus Project Conditions
5. Buildout Conditions



Existing Conditions are discussed within the Setting section in the preceding paragraphs. The Existing plus Project, Cumulative plus Project, and Buildout Conditions are discussed in the following impact discussions labeled T-2, T-6, and T-7, respectively. The Impact T-3 section discusses the project's consistency with the City's General Plan and Bicycle Master Plan with respect to public transit, and bicycle and pedestrian facilities. Impact T-4 discusses the project's potential to increase hazards due to a design feature or incompatible uses or to result in inadequate emergency access.

Trip Generation. The traffic projections for the proposed TCSP were developed using the following three steps: 1) estimating the trip generation of the TCSP; 2) determining trip distribution; and 3) assigning the TCSP traffic to the roadway system. These three steps are described below.

TCSP Trip Generation. Trip generation estimates for the Teal Club Specific Plan were developed based on the rates presented in the Institute of Transportation Engineers Trip Generation Manual for Land Use #210 – Single Family Residence, Land Use #220 – Multi-Family Housing (Low-Rise) and Land Use #710 – General Office. and rates contained in SANDAG's Traffic Generators for Neighborhood Commercial, Community Park and Neighborhood Park.

A portion of external trips to the commercial land uses proposed along Ventura Road would be "pass-by trips", meaning trips that are already on the adjacent road system and simply stop at the site on their way to or from another (primary) destination. The pass-by trips would be attracted from traffic already traveling on Ventura Road, which offer direct access to the site. Pass-by trips are therefore not new to the immediate vicinity of the site. Based on ITE's Trip Generation Handbook Appendix E – Database on Pass-By, Diverted and Primary Trips, the pass-by rate for commercial is 34% of the external PM peak hour trips, and a 10% pass-by rate was applied to the average daily trips and AM peak hour trips.

The trip generation rates assume that each project component is a stand-alone land use. Due to the mix of land uses proposed on the site, a portion of the trips generated by the project would remain internal to the site and not enter the external roadway network. ITE's Trip Generation Handbook defines a multi-use development as a "real estate project that consists of two or more ITE land use classifications between which trips are made without using the off-site road system." The project's internal trips were determined based on the recommended procedure presented in NCHRP Report 684: Enhancing Internal Trip Capture Estimation for Mixed-Use Developments.

Table 4.13-3 summarizes the trip generation rates and resulting trip generation for the TCSP. As shown in the table, the TCSP is estimated to generate 13,570 daily trips at full buildout, with 867 trips in the AM peak hour and 956 trips in the PM peak hour.



**Table 4.13-3
 Project Trip Generation Summary**

Land Use	SF/DU	AM Peak Hour Trips			PM Peak Hour Trips			ADT
		In	Out	Total	In	Out	Total	
Single-Family Residential	220	41	122	163	139	79	218	2,077
Multi-Family (Low-rise)	770	82	273	355	272	159	431	5,636
Neighborhood Commercial	60,000	173	115	288	360	360	720	7,200
Business Park/R&D	132,000	132	21	153	24	128	152	1,286
Community Park	17.8	7	7	14	14	14	28	356
<i>Sub Total</i>		434	538	972	809	740	1,549	16,555
<i>Internal Trips</i>		31	45	76	206	191	397	2,483
<i>External Trips</i>		403	493	896	603	549	1,152	14,072
<i>Pass-by Trips</i>		17	12	29	107	89	196	502
Total Primary Trips		386	481	867	496	460	956	13,570

ADT = Average Daily Traffic, DU = Dwelling Units, TSF = Thousand Square Feet, Stu = Students
 Source: Stantec, 2019 (see Appendix I)

TCSP Trip Distribution. Project trips were distributed and assigned to the local street network based on modeled select zone volumes from the Oxnard Traffic Model, as developed for the project site for the Teal Club Specific Plan. Trip distribution is illustrated on Figure 4.13-3.

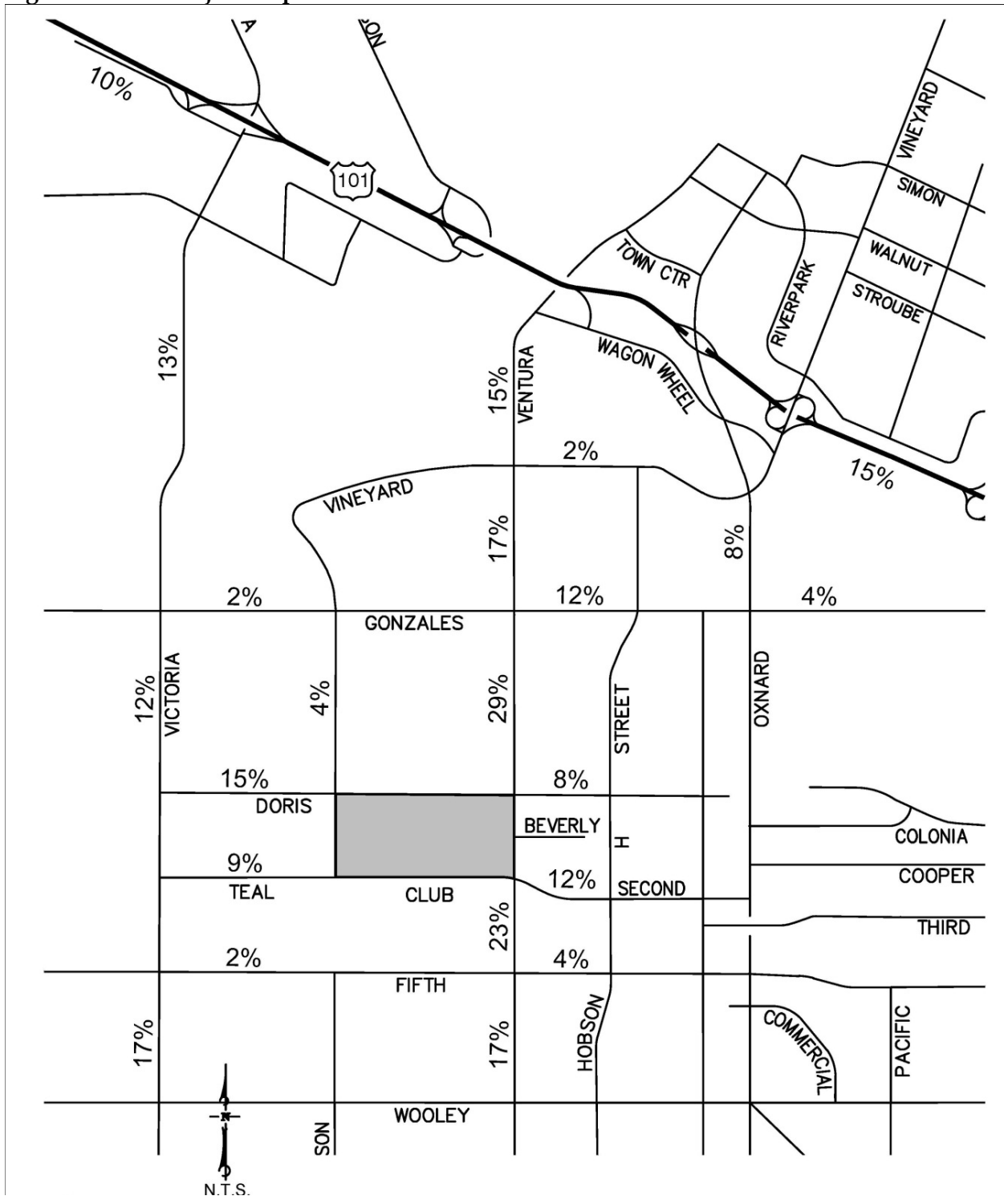
Significance Thresholds. The significance criteria for this analysis were developed from criteria presented in Appendix G “Environmental Checklist Form” of the City of Oxnard’s 2017 CEQA Thresholds Guidelines. The proposed project would result in a significant impact if it would:

- 1) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratios on roads, or congestion at intersections) based on adopted City of Oxnard level of service (LOS) standards;
- 2) Exceed, either individually or cumulatively, an LOS standard established by the Ventura County Congestion Management Program (CMP) for designated roads or highways;
- 3) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- 4) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- 5) Result in inadequate emergency access; or,
- 6) Conflict with adopted policies plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No impact with respect to criterion (3) would occur and this issue is therefore discussed in Section 6.0, *Effects Found Not to be Significant*. The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.



Figure 4.13-3 Project Trip Distribution



In 2018 the State CEQA Guidelines underwent revisions that removed Level of Service (LOS) as a consideration in determining the significance of transportation-related impacts under CEQA and replaced LOS with other metrics, such as vehicle miles traveled (VMT). Therefore, to augment the City's 2017 CEQA Thresholds Guidelines, the following threshold has been added consistent with Appendix G of the State CEQA Guidelines:

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

CEQA Guidelines Section 15064.3 sets forth considerations for evaluating a project's transportation impacts. According to Section 15064.3(a), "a project's effect on automobile delay shall not constitute a significant environmental impact." CEQA Guidelines Section 15064.3(b) includes criteria for analyzing transportation impacts. For land use projects, the guidelines state

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

While the CEQA Guidelines have removed LOS considerations for evaluating a project's transportation impacts, the City of Oxnard's General Plan still includes policy language which requires:

- "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." Goal ICS-2
- "Level of service "C" at designated intersections, unless otherwise reduced by City Council direction." Goal ICS-3
 - Policy ICS-3.2 identifies the following five specific intersections that may operation with a level of service "D" either in the AM or PM periods, or both, at the five intersections listed below and level of service "F" at Five Points in order to avoid adversely impacting private homes and/or businesses resulting from additional mitigations, or preserve or enhance aesthetic integrity.
 1. C Street and Wooley Road
 2. Oxnard Boulevard and Vineyard Avenue
 3. Oxnard Boulevard and Gonzales Road
 4. Gonzales Road and Rose Avenue
 5. Five Points (Oxnard Boulevard/Saviers Road/Wooley Road)

Consequently, for purposes of transparency, this EIR still includes a LOS discussion. The EIR includes "recommended" mitigation measures to achieve consistency with the General Plan standards.

Performance Criteria.

City of Oxnard. According to the City of Oxnard criteria, LOS C (peak hour ICU less than or equal to 0.80) is considered the worst acceptable LOS for an intersection in Oxnard. A project



causes a significant impact if it contributes 0.02 or more to the ICU value at an intersection operating at LOS C or worse. Mitigation would require construction of all improvements necessary to reduce project impacts at intersections operating at LOS C or worse where the project would worsen the ICU value by 0.02 or more.

Caltrans. Caltrans-controlled intersections use Caltrans thresholds and performance standards. Caltrans has established the cusp of the LOS C/D range as the target level of service standard for State Highway intersections. If an existing State Highway facility is operating at less than the target LOS, the existing Measure of Effectiveness (MOE) should be maintained.

b. Project Impacts and Mitigation Measures. Table 4.13-4 lists the thresholds under consideration in the traffic analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.13-4
 Summary of Traffic Impact Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratios on roads, or congestion at intersections) based on adopted City of Oxnard level of service (LOS) standards?			X	
2. Exceed, either individually or cumulatively, an LOS standard established by the Ventura County Congestion Management Program (CMP) for designated roads or highways			X	
3. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;			X	
4. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
5. Result in inadequate emergency access			X	
6. Conflict with adopted policies plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X	
7. Conflict with or be inconsistent with CEQA Guidelines 15064.3, subdivision (b)?			X	

Impact T-1 **The proposed TCSP includes road widening improvements on Ventura Road, Patterson Road, Doris Avenue, and Teal Club Road to accommodate traffic associated with the Specific Plan. With the proposed roadway improvements, impacts would be Class III, less than significant.**



In December 2019 California's Third District Court of Appeal ruled that under SB 743, automobile delay may no longer be treated as a significant impact in CEQA analysis (*Citizens for Positive Growth & Preservation v. City of Sacramento*). Nonetheless, an analysis related to roadway congestion is included for informational purposes.

Consistent with the 2030 General Plan, the proposed TCSP includes improvements to the local area roadway system adjacent to the site. Ventura Road, Patterson Road, Doris Avenue and Teal Club Road would be widened to Local (two to four lanes) and Primary Arterial (six lanes) standards. Where these roads are adjacent to the TCSP Area, the widening would be required to occur on the Teal Club properties.

Ventura Road would be built out to a six-lane Primary Arterial, with the project improvement limits starting north of Doris Avenue and ending south of Teal Club Road. Included in the widening of Ventura Road, the project has planned for multiple bus pull-out locations on southbound and northbound lanes as well as on-street bike lane striping. The addition of bus stops on southbound and northbound lanes would help provide public transit options to serve the residents of the Teal Club Specific Plan development. This may require a partial realignment of the entire right of way (ROW) to create room for bus stops on the east side of Ventura Road.

Teal Club Road is currently a two-lane rural road and is programmed to be built up to two-lane local arterial standards between Victoria Avenue and Patterson Road, and to secondary arterial standards between Patterson Road and Oxnard Boulevard. The preferred lane configuration for the secondary arterial would be two travel lanes and a Class II bike lane in each direction divided by a raised median. Widening of Teal Club Road to local arterial and secondary arterial standards would improve roadway operations to accommodate the increase in traffic volume as a result of the proposed project.

Patterson Road between Doris Avenue and Teal Club Road is also programmed to be built out to a local arterial with a cross section similar to Teal Club Road. Patterson Road north of Doris Avenue has a 16-foot wide planted median, and this treatment could also be an option for Patterson Road between Doris Avenue and Teal Club Road.

Doris Avenue between Patterson Road and Ventura Road was resurfaced in July 2014. As a result of that resurfacing, westbound Doris Avenue was striped with two lanes plus a bicycle lane and a planted median with street lights between Coronado Place and Waverly Court. The City would prefer to see this median treatment continuous between Ventura Road and Patterson Road and for the lanes to match for the eastbound direction. The cross section would be two travel lanes and a Class II bike lane in each direction divided by a raised median.

The future roadway widening to local arterial standards of Doris Avenue and Teal Club Road between Patterson Road and Victoria Avenue should be planned based on future development in the area (including the adjacent Oxnard School District school site), for which the Teal Club Specific Plan project would pay its proportionate share to the cost of roadway widening. Although these are not significant impacts under CEQA, mitigation measures are recommended to implement roadway widenings. Based on the required mitigation improvements needed at each project completion phase, Table 4.13-5 summarizes the full build out of the local roadway network.



**Table 4.13-5
 Project Frontage Roadway Segment Improvements**

Segment	Improvements	Completion
Ventura Road (north of Doris to south of Teal club)	Full Roadway widening – 6 Lane Primary Arterial	Prior to occupancy of Phase 1
Patterson Road (Project boundary to Teal)	Full Roadway widening – 2 Lane Local Arterial	Prior to occupancy of Phase 2
Doris Avenue (Project boundary to Ventura)	Full Roadway widening – 4 lane Local Arterial	Prior to occupancy of Phase 1
Teal Club Road (Ventura to Coronado)	Full Roadway widening - 4 Lane Local Arterial	Prior to occupancy of Phase 1
Teal Club Road (Coronado to Patterson)	Full Roadway widening - 4 Lane Local Arterial	Prior to occupancy of Phase 2

Source: Stantec, 2019

Mitigation Measures. The following mitigation measures are recommended.

- T-1(a) Ventura Road between Doris Avenue and Teal Club Road.** The project developer shall construct the widening of this roadway segment to primary arterial (six lane) standards. Construction shall be completed prior to occupancy clearance for any portion of Phase 1 development.

- T-1(b) Doris Avenue between the Plan Area Boundary and Ventura Road.** The project developer shall construct the widening of this roadway segment to full local arterial (four lane) standards. Construction shall be completed prior to occupancy clearance for any portion of Phase 1 development.

- T-1(c) Teal Club Road between Ventura Avenue and Coronado Road.** The project developer shall construction the widening of this roadway segment to full local arterial (four lane) standards. Construction shall be completed prior to occupancy clearance for any portion of Phase 1 development.

- T-1(d) Patterson Road between the Plan Area Boundary and Teal Club Road.** The project developer shall implement improvements at this location of the widening of this roadway segment to local arterial (two lane) standards. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.

- T-1(e) Teal Club Road between Coronado Road and Patterson Road.** The project developer shall implement improvements at this location of the widening of this roadway segment to local arterial (four lane) standards. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.



- T-1(f) Doris Avenue between Patterson Road and Victoria Avenue.**
The project developer shall install safety measures as determined by the City's Traffic Engineer to address the open ditch on the north side of the roadway.
- T-1(g) Teal Club Road between Patterson Road and Victoria Avenue.**
The project developer shall install safety measures as determined by the City's Traffic Engineer to address the open ditch on the north side of the roadway.

Significance After Mitigation. Because automobile delay may no longer be treated as a significant impact under CEQA, impacts would be less than significant without mitigation. Nonetheless, mitigation is recommended for proposed roadway widening.

- Impact T-2 Traffic generated by the proposed TCSP when added to existing conditions would result in levels of service that exceed City thresholds at two intersections and would warrant signalization of two intersections. Mitigation is recommended to address this impact; however, automobile delay is no longer considered a significant impact in CEQA analysis. Impacts would be Class III, less than significant.**

In December 2019 California's Third District Court of Appeal ruled that under SB 743, automobile delay may no longer be treated as a significant impact in CEQA analysis (*Citizens for Positive Growth & Preservation v. City of Sacramento*).

Project-generated traffic was added to the existing peak hour traffic volumes and levels of service were recalculated for Existing plus Project conditions. This analysis assumes that the project would widen Patterson Road, Doris Avenue, and Teal Club Road to Local Arterial standards, and Ventura Road to Primary Arterial standards along its frontage (refer to Impact T-1). These would result in increased capacity at the Patterson Road/Teal Club Road intersection and the intersections of Ventura Road with Doris Avenue, Beverly Drive and Teal Club Road, by adding turning lanes and through lanes at intersection approaches. The intersection geometries under project-specific conditions are shown in Figure 4.13-4.

The existing plus project traffic volumes are illustrated in Figure 4.13-5; and Table 4.13-6 and Table 4.13-7 summarize the level of service calculations. As shown in the tables, the project would generate project-specific impacts based on City of Oxnard impact thresholds at the following intersections:

6. Victoria Avenue/Teal Club Road. The intersection is currently controlled by a stop sign on Teal Club Road. According to the project traffic study, the existing plus project volumes would satisfy Warrant 3 - Peak Hour (70% Factor/Rural) signal warrants.
18. Ventura Road/Beverly Drive. The intersection is currently controlled by a stop sign on Beverly Drive. According to the project traffic study, the existing plus project peak hour volumes would satisfy Warrant 3 - Peak Hour signal warrants.



Although this is not a significant impact under CEQA, mitigation is recommended.

**Table 4.13-6
Existing plus Project AM Intersection Levels of Service**

Intersection	AM Peak Hour				V/C or Delay Increase	Impact?
	Existing		Existing Plus Project			
	ICU/HCM	LOS	ICU/HCM	LOS		
1. Victoria Ave & US 101 NB Ramps	21.4 sec	C	21.5 sec	C	0.1 sec	No
2. Victoria Ave & Valentine Rd	0.55	A	0.57	A	0.02	No
3. Victoria Ave & Olivas Park Rd	0.70	B	0.72	C	0.02	No
4. Victoria Ave & Gonzales Rd	0.74	C	0.77	C	0.03	No
5. Victoria Ave & Doris Ave	0.82	D	0.83	D	0.01	No
6. Victoria Ave & Teal Club Rd	<50.0	F	>50.0	F	n/a	Yes
7. Victoria Ave & Fifth St	0.67	B	0.68	B	0.01	No
8. Victoria Ave & Wooley Rd	0.65	B	0.66	B	0.01	No
9. Patterson Rd & Gonzales Rd	0.60	A	0.61	B	0.01	No
10. Patterson Rd & Doris Rd (AWS)	13.2	B	15.5 sec	C	2.3 sec	No
11. Patterson Rd & Teal Club Rd (TWS) ¹	10.2	B	10.5 sec	B	0.3 sec	No
12. Ventura Rd & Town Center Dr	0.30	A	0.31	A	0.01	No
13. Ventura Rd & Wagon Wheel Dr	0.53	A	0.56	A	0.03	No
14. Wagon Wheel Dr & U.S. 101 SB off	7.6	A	7.6	A	0 sec	No
15. Ventura Rd & Vineyard Dr	0.47	A	0.48	A	0.01	No
16. Ventura Rd & Gonzales Rd	0.63	B	0.65	B	0.02	No
17. Ventura Rd & Doris Ave	0.76	C	0.66	B	n/a	No
18. Ventura Rd & Beverley Dr	29.7 sec	D	>50.0	F	>21.3 sec	Yes
19. Ventura Rd & Teal Club Rd	0.74	C	0.65	B	n/a	No
20. Ventura Rd & Fifth St	0.63	B	0.66	B	0.03	No
21. Ventura Rd & Wooley Rd	0.74	C	0.76	C	0.02	No
22. Oxnard Blvd & Town Center Dr	0.53	A	0.54	A	0.01	No
23. Oxnard Blvd & U.S. 101 NB Ramps	22.2 sec	C	22.5	C	0.3 sec	No
24. Oxnard Blvd & U.S. 101 SB Ramps	18.8	B	18.9	C	0.1 sec	No
25. Oxnard Blvd & Gonzales Rd	0.65	B	0.65	B	0	No

¹ Project frontage improvement: intersection widening and geometry improvements under project-specific conditions.

Source: Stantec, 2019



**Table 4.13-7
Existing plus Project PM Intersection Levels of Service**

Intersection	PM Peak Hour				V/C or Delay Increase	Impact?
	Existing		Existing Plus Project			
	ICU/HCM	LOS	ICU/HCM	LOS		
1. Victoria Ave & US 101 NB Ramps	20.4 sec	C	20.5 sec	C	0.1 sec	No
2. Victoria Ave & Valentine Rd	0.68	B	0.69	B	0.01	No
3. Victoria Ave & Olivas Park Rd	0.72	C	0.74	C	0.02	No
4. Victoria Ave & Gonzales Rd	0.75	C	0.78	C	0.03	No
5. Victoria Ave & Doris Ave	0.78	C	0.79	C	0.01	No
6. Victoria Ave & Teal Club Rd	<50.0	F	>50.0	F	n/a	Yes
7. Victoria Ave & Fifth St	0.53	A	0.54	A	0.01	No
8. Victoria Ave & Wooley Rd	0.60	A	0.60	A	0	No
9. Patterson Rd & Gonzales Rd	0.44	A	0.44	A	0	No
10. Patterson Rd & Doris Rd (AWS)	10.5 sec	B	12.5 sec	B	2.0 sec	No
11. Patterson Rd & Teal Club Rd (TWS) ¹	9.9 sec	A	10.4 sec	B	0.5 sec	No
12. Ventura Rd & Town Center Dr	0.45	A	0.46	A	0.01	No
13. Ventura Rd & Wagon Wheel Dr	0.50	A	0.54	A	0.04	No
14. Wagon Wheel Dr & U.S. 101 SB off	7.0 sec	A	7.0 sec	A	0 sec	No
15. Ventura Rd & Vineyard Dr	0.48	A	0.51	A	0.03	No
16. Ventura Rd & Gonzales Rd	0.65	B	0.69	B	0.04	No
17. Ventura Rd & Doris Ave	0.76	C	0.65	B	n/a	No
18. Ventura Rd & Beverley Dr	44.9	E	>50.0	F	n/a	Yes
19. Ventura Rd & Teal Club Rd	0.75	C	0.59	A	n/a	No
20. Ventura Rd & Fifth St	0.62	B	0.67	B	0.05	No
21. Ventura Rd & Wooley Rd	0.71	C	0.73	C	0.02	No
22. Oxnard Blvd & Town Center Dr	0.52	A	0.53	A	0.01	No
23. Oxnard Blvd & U.S. 101 NB Ramps	26.9 sec	C	27.3 sec	C	0.4 sec	No
24. Oxnard Blvd & U.S. 101 SB Ramps	19.5 sec	B	22.3 sec	C	2.7 sec	No
25. Oxnard Blvd & Gonzales Rd	0.68	B	0.70	B	0.02	No

¹ Project frontage improvement: intersection widening and geometry improvements under project-specific conditions.

Source: Stantec 2019



Figure 4.13-4 Project Specific Intersection Geometries

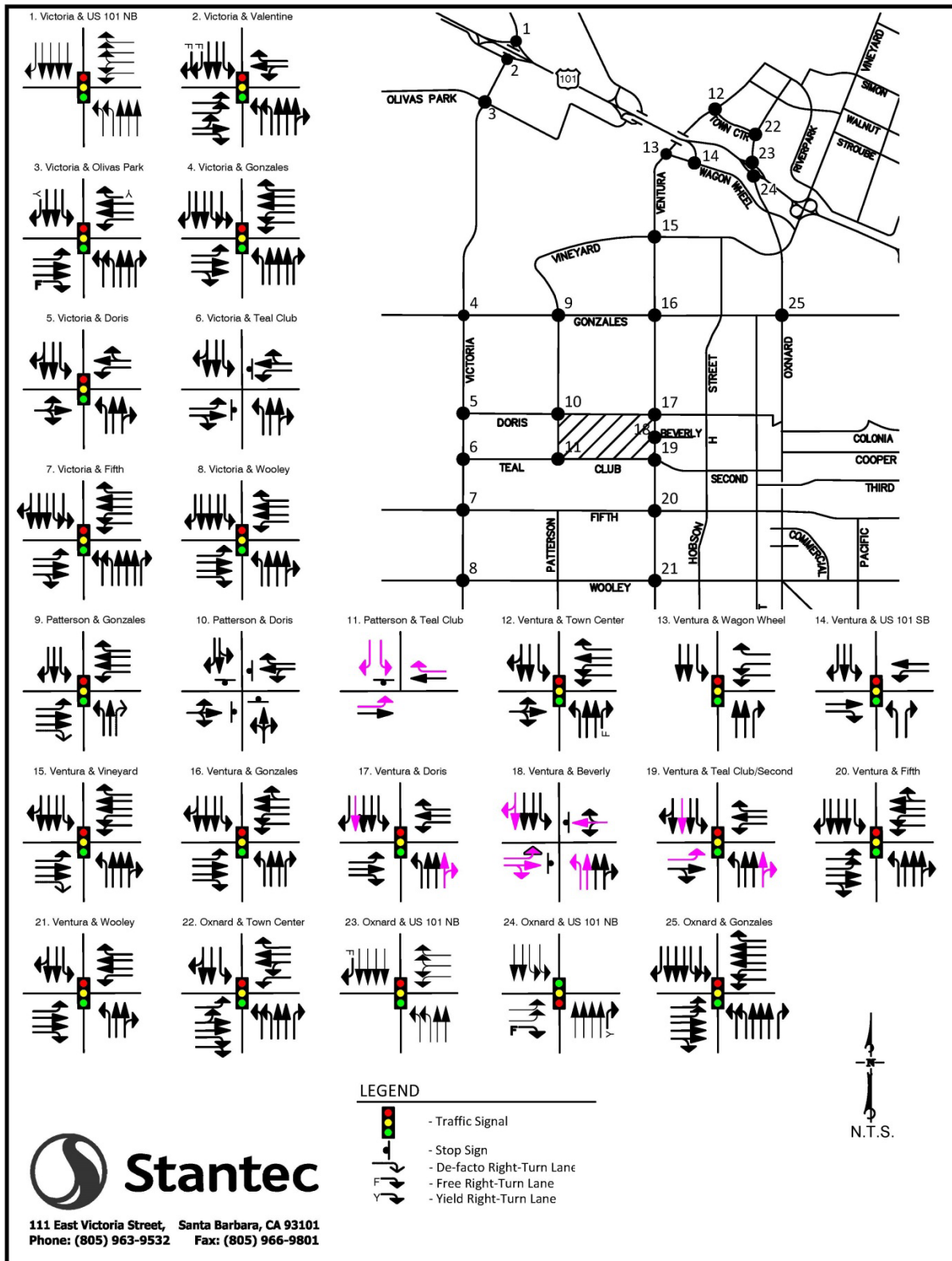
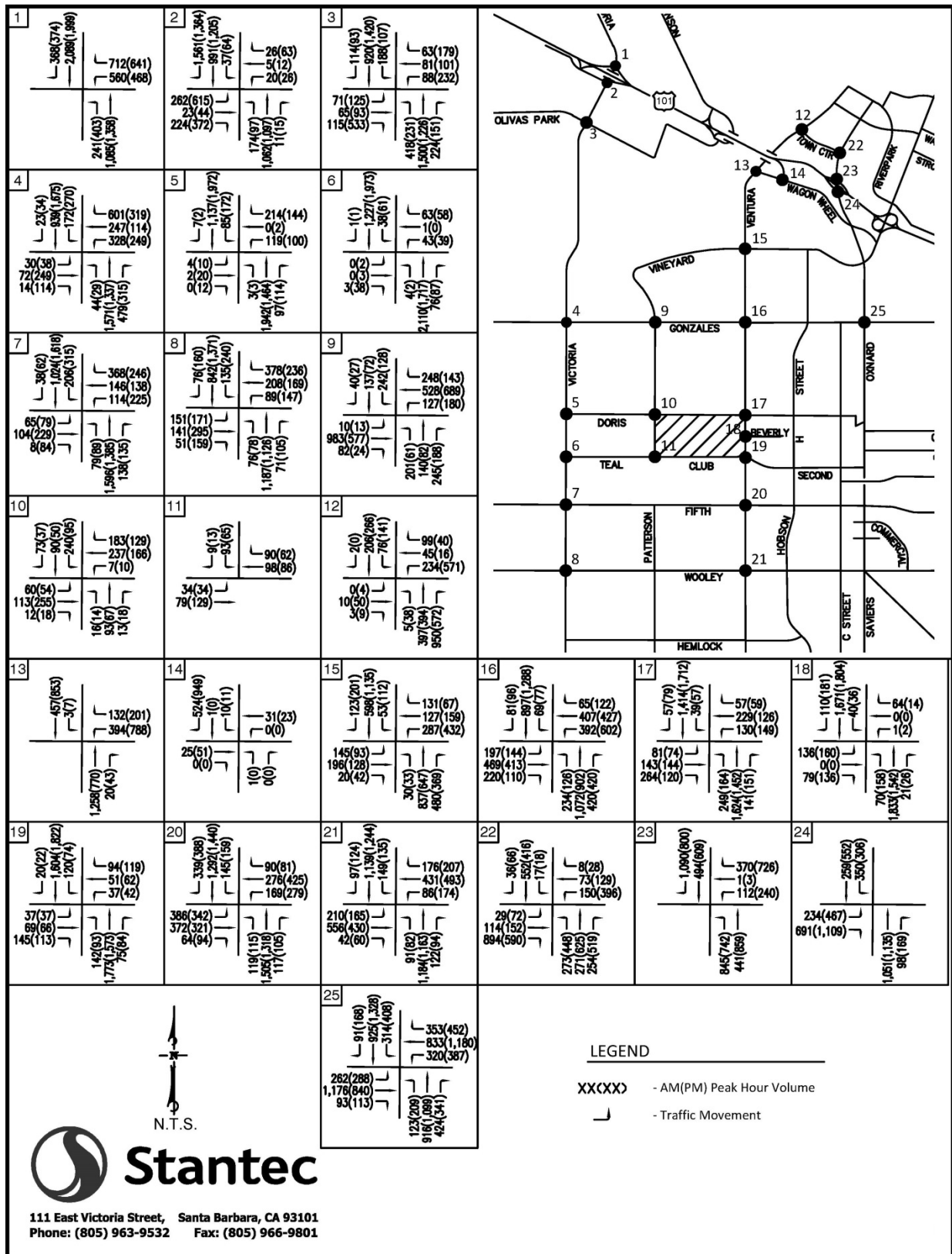


Figure 4.13-5 Existing + Project AM and PM Peak Hour Traffic Volumes



Mitigation Measures. The following mitigation measures are recommended to reduce impacts to the applicable intersections to the extent feasible.

- T-2(a) Victoria Avenue and Teal Club Road.** The project developer shall be responsible for signalization of the intersection. Signalization shall occur prior to occupancy clearance for any portion of Phase 1 development.
- T-2(b) Ventura Road and Beverly Drive.** The project developer shall be responsible for signalization of the intersection. Signalization shall occur prior to occupancy clearance for any portion of Phase 1 development.

Significance After Mitigation. Because automobile delay may no longer be treated as a significant impact under CEQA, impacts would be less than significant without mitigation. Nonetheless, mitigation is recommended to mitigate intersection LOS to an acceptable LOS C. As shown in Table 4.13-8, with implementation of recommended mitigation measures T-2(a) and T-2(b), the Victoria Avenue/Teal Club Road and Ventura Road and Beverly Drive intersections would operate at an acceptable LOS level.

**Table 4.13-8
 Project-Specific Mitigated Intersection Levels of Service**

Intersection	Mitigation Measure	AM Peak Hour			PM Peak Hour		
		Unmitigated	Mitigated	Impact?	Unmitigated	Mitigated	Impact?
6. Victoria Ave/Teal Club Road	T-2(a)	>50.0/ LOS F	0.80/ LOS C	No	>50.0/ LOS F	0.77/ LOS C	No
18. Ventura Rd/Beverly Dr	T-2(b)	>50.0/ LOS F	0.60/ LOS A	No	>50.0/ LOS F	0.67/ LOS B	No

Unmitigated = Existing plus Project Unmitigated ICU – HCM/LOS

Mitigated = Mitigated HCM/LOS

Source: Stantec, 2019 (see Appendix I)

Impact T-3 Future development anticipated under the proposed TCSP and additional annexation area would be consistent with the City’s General Plan and Bicycle Master Plan by developing bicycle and pedestrian facilities. Public transit facilities would be installed as part of the City’s General Plan. Impacts would be Class III, less than significant.

As mentioned previously, included in the 2030 General Plan are plans to widen Ventura Road. As part of this widening project, multiple bus pull-out locations on southbound and northbound lanes of Ventura Road would be built. The planned bus stops would serve the project area. The addition of bus stops on southbound and northbound lanes would help provide public transit options to serve the project area. Additional routes or operations needed to serve the project area would be based on demand for public transit and would be evaluated and implemented by Gold Coast Transit as development occurs under the TCSP. This would assure that adequate public transit is provided within the project area. As such, the proposed TCSP would not conflict with, degrade or decrease the safety of planned public transportation.



Future transit improvements would be subject to subsequent environmental review, wherein potential impacts would be addressed. Overall, impacts would be less than significant.

The Ventura Road widening project would involve on-street bike lane striping that would serve bicyclists traveling to and from the project site. The TCSP would also include facilities to accommodate cyclists and pedestrians. The project area would be interconnected by sidewalks along public streets, pedestrian and bike paths within greenbelts, and bike lanes on major public streets (see Figure 2-4 in Section 2.0, *Project Description*). Public plazas and gathering places in the commercial mixed-use area would be designed for easy access to the pedestrian network.

Commercial and industrial developments would also be required to provide adequate transportation demand management and trip reduction measures as required by the City's traffic and transportation manager (OCC Section 16-631). Therefore, the TCSP and development in the additional annexation area would be consistent with adopted policies, plans, or programs supporting alternative transportation.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Impacts to alternative transportation facilities would be less than significant without mitigation.

Impact T-4 Future development anticipated under the proposed TCSP would not increase hazards due to a design feature or incompatible uses and would not result in inadequate emergency access. Impacts would be Class III, less than significant.

Vehicular, pedestrian, and bicycle access to the TCSP is proposed via two connections to Doris Avenue, four connections to Teal Club Road and one connection to Ventura Road opposite Beverly Drive (see Figure 2-4 in Section 2.0, *Project Description*). It is expected that the new intersections on Doris Avenue and Teal Club Road will operate acceptably with stop control on the minor (project) approaches. The Ventura Road/Beverly Drive intersection currently operates below the City's LOS C standard and project traffic would further increase (side street) delays. As discussed above, frontage improvements proposed as part of the project would include installation of a traffic signal. The intersection is expected to operate at LOS C or better with a traffic signal and addition of a third lane in the southbound direction (existing plus and cumulative plus project conditions), and at LOS B or better with a traffic signal and addition of a third lane in the northbound and southbound direction (buildout plus project conditions). The ultimate intersection geometry is shown in Figure 4.13-7.

Roadways within the TCSP area will be designed constructed according to City residential and collector roadway standards to provide adequate local, emergency vehicle and service vehicle access. The specific plan will include an internal circulation system that will provide pedestrian connectivity between the residential, office, retail uses and parks, as well as to the adjacent future school complex and the external sidewalk system. Buildout of Patterson Road, Doris Avenue, Teal Club Road and Ventura Road will include provision of sidewalks along the specific plan boundary, and crosswalks at the signalized intersections of Ventura Road with Doris Avenue, Beverly Drive and Teal Club Road. The future school complex is expected to



install crosswalks at the Patterson Road/Doris Avenue. Installation of crosswalks at other (unsignalized) intersections along Doris Avenue could be evaluated in the future as pedestrian volumes warrant. Vehicles traveling to and from the site would not cause any conflicts with the properties to the south, east, and west of the site as the proposed project does not involve any agricultural uses that would involve farm equipment and the project site is integrated into the overall circulation system for the neighborhood. Therefore, the proposed project would not increase hazards due to a design feature (e.g., sharp curves or dangerous intersections).

The project area would not introduce incompatible uses (e.g., on-site farm equipment) that would increase hazards. Adjacent agricultural uses may result in slow farm vehicles and equipment traveling on area roadways. However, farm vehicles would not utilize TCSP roadways. In addition, farm vehicles related to agricultural uses west of the project site may travel westward to other agricultural uses, but would not often head eastward past the project area towards the City of Oxnard. The proposed project would add vehicles traveling west on Doris Avenue and Teal Club Road past agricultural uses. However, the added passenger traffic would not change significantly compared to existing conditions as passenger vehicles currently utilize these roadways to travel west and north. Therefore, the TCSP would not increase hazards due to incompatible uses.

Emergency vehicles would also have access to the project area via any of the proposed access points and the roadways would meet the minimum standards required by the City of Oxnard Fire Department. Therefore, the TCSP would not result in inadequate emergency access.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

Impact T-5 The proposed TCSP and development of the additional Annexation area would not conflict with or be inconsistent with CEQA Guidelines 15064.3(b). Impacts would be Class III, less than significant.

Per Senate Bill (SB) 743, the State CEQA Guidelines have been updated to incorporate VMT as the primary metric for analyzing transportation impacts under CEQA. The City of Oxnard has not adopted specific thresholds related to VMT. The OPR's Technical Advisory on Evaluating Transportation Impacts, dated 2018, provides guidance on analyzing VMT impacts in light of SB 743. The Advisory recommends thresholds for residential, office, and retail land uses. The proposed TCSP includes residential, commercial mixed use (retail and office), a business and research park, as well as parks and open space. The proposed Annexation area would allow for warehouse and manufacturing uses. Therefore, OPR's advisory does not recommend thresholds for many of the land uses proposed under the TCPS and Annexation. Nonetheless, the Advisory suggests that residential or retail projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact.

As explained in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, based on the CalEEMod estimate, the proposed project would result in approximately 25,349,026 new annual VMT. This would equate to approximately 4,207 miles per service population (residents and employees)



per year or approximately 12 miles per day. By comparison, the Southern California Association of Governments estimates the 2040 average work trip length at 15.5 miles. This suggests an average of 31 miles (15.5 x 2) per employee per day. The 12 miles per employee per day for the project would be about 61% lower than this average, which far exceeds the 15% reduction threshold that the OPR recommends.

In addition, by its nature, the proposed project is intended to provide for overall VMT reduction. As discussed above under Impact T-4 and in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, the TCSP site is located in an urbanized area immediately adjacent to alternative transit options and within walking distance of multiple commercial opportunities which would provide a range of goods and services to site residents, employees, and visitors. Nearby commercial areas include Esplanade Mall, Riverpark Town Center, and Oxnard Financial Plaza. The proposed development also incorporates dedicated pedestrian and bicycle paths, new bus stops and bus shelters. Finally, the TCSP is a mixed-use development that provides housing, jobs, and visitor amenities in proximity to transit options, jobs, and services. Based on these facts, the TCSP is consistent with the general goal of reducing GHG emissions by reducing VMT.

Based on the above, the project would not conflict with or be inconsistent with CEQA Guidelines 15064.3(b). This impact would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts.

Impact T-6 Traffic generated by the proposed TCSP when added to the cumulative condition would result in levels of service that exceed City thresholds at four intersections. Mitigation is recommended to address this impact; however, automobile delay is no longer considered a significant impact in CEQA analysis. Therefore, impacts would be Class II, *less than significant*.

In December 2019 California's Third District Court of Appeal ruled that under SB 743, automobile delay may no longer be treated as a significant impact in CEQA analysis (*Citizens for Positive Growth & Preservation v. City of Sacramento*).

The City of Oxnard requires that the study-area intersections are analyzed assuming "background" traffic conditions, which include traffic that could be generated by other developments in the study area. The following section discusses the cumulative (existing conditions plus approved and pending projects) conditions.

Review of roadway or intersection improvements associated with approved projects included in the cumulative analysis and the City's Five-Year Capital Improvement Plan indicates that the following improvements are planned within the study-area.



- **U.S. 101 Southbound Off-Ramp at Wagon Wheel Road.** The Oxnard Village Specific Plan, proposed south of U.S. 101 and west of Oxnard Boulevard, will realign Wagon Wheel Road further south away from U.S. 101 and realign the U.S. 101 Southbound Off-Ramp to intersect with Ventura Road instead of Wagon Wheel Road. The Wagon Wheel Road/U.S. 101 SB Off-Ramp intersection is therefore removed from the cumulative analysis.
- **Patterson Road and Doris Avenue.** The Oxnard School District school complex, proposed on the northwest corner of the Teal Club Specific Plan, will widen Patterson Road and Doris Avenue along its frontage to Local Arterial standards. While the traffic study completed for the school site indicated that the project would warrant traffic signals at the Victoria Avenue/Teal Club Road and Patterson Road/Doris Avenue intersection, the following cumulative analysis does not assume these signals to be in place.

Cumulative traffic volumes were developed using a list of pending development projects provided by City staff. In addition, traffic generated by the Oxnard School District school site was added to the cumulative volumes. A map showing the pending projects within the study area is included in Appendix I.

The cumulative projects traffic volumes were distributed onto the study-area street network based on each individual project's location, existing traffic patterns, and a general knowledge of the residential and commercial lay-out of the Oxnard area. The cumulative projects' AM and PM peak turning volumes were assigned to the study area intersections and added to the existing peak hour volumes. The cumulative plus project peak hour volumes are illustrated in Figure 4.13-6.

Intersection levels of service were recalculated assuming cumulative and cumulative traffic conditions. The calculations are summarized in Table 4.13-9 and Table 4.13-10, which indicates that the project would generate cumulative impacts based on City of Oxnard impact thresholds at the following intersections:

5. Victoria Avenue/Doris Avenue;
6. Victoria Avenue/Teal Club Road;
10. Patterson Road/Doris Avenue.
18. Ventura Road/Beverly Drive

Similar to project-specific conditions (Existing plus Project), the project frontage improvement to widen Ventura Road to Primary Arterial standards would increase capacity intersections for Doris Avenue, Beverly Drive and Teal Club Road (see discussion under Impact T-1). The project frontage improvements would also reduce delays at the Patterson Road/Teal Club Road intersection under cumulative plus project conditions by adding capacity on the southbound and westbound approaches. Nevertheless, mitigation is recommended to reduce impacts to the four listed intersections.



**Table 4.13-9
 Cumulative plus Project AM Intersection Levels of Service**

Intersection	AM Peak Hour				V/C or Delay Increase	Impact?
	Cumulative		Cumulative plus Project			
	ICU/HCM	LOS	ICU/HCM	LOS		
1. Victoria Ave & US 101 NB Ramps	21.4 sec	C	21.5 sec	C	0.1 sec	No
2. Victoria Ave & Valentine Rd	0.56	A	0.58	A	0.02	No
3. Victoria Ave & Olivias Park Rd	0.73	C	0.75	C	0.02	No
4. Victoria Ave & Gonzales Rd	0.77	C	0.79	C	0.02	No
5. Victoria Ave & Doris Ave	0.86	D	0.90	D	0.04	Yes
6. Victoria Ave & Teal Club Rd	>50.0	F	>50.0	F	n/a	Yes
7. Victoria Ave & Fifth St	0.73	C	0.73	C	0	No
8. Victoria Ave & Wooley Rd	0.71	C	0.73	C	0.02	No
9. Patterson Rd & Gonzales Rd	0.66	B	0.66	B	0	No
10. Patterson Rd & Doris Rd (AWS)	>50.0	F	>50.0	F	n/a	Yes
11. Patterson Rd & Teal Club Rd (TWS) ¹	12.8 sec	B	14.9 sec	B	2.1 sec	No
12. Ventura Rd & Town Center Dr	0.42	A	0.43	A	0.01	No
13. Ventura Rd & Wagon Wheel Dr	0.60	A	0.63	A	0.01	No
14. Wagon Wheel Dr & U.S. 101 SB off	Intersection Removed					
15. Ventura Rd & Vineyard Dr	0.49	A	0.51	A	0.02	No
16. Ventura Rd & Gonzales Rd	0.66	B	0.68	B	0.02	No
17. Ventura Rd & Doris Ave	0.82	D	0.73	C	n/a	No
18. Ventura Rd & Beverley Dr	32.9 sec	D	>50.0	F	n/a	Yes
19. Ventura Rd & Teal Club Rd	0.76	C	0.67	B	n/a	No
20. Ventura Rd & Fifth St	0.64	B	0.68	B	0.04	No
21. Ventura Rd & Wooley Rd	0.75	C	0.78	C	0.03	No
22. Oxnard Blvd & Town Center Dr	0.66	B	0.68	B	0.02	No
23. Oxnard Blvd & U.S. 101 NB Ramps	22.2 sec	C	22.6 sec	C	0.4 sec	No
24. Oxnard Blvd & U.S. 101 SB Ramps	18.8 sec	B	18.8 sec	B	0	No
25. Oxnard Blvd & Gonzales Rd	0.65	B	0.66	B	0.01	No

¹ Project frontage improvement: intersection widening and geometry improvements under cumulative + project conditions
 Source: Stantec, 2019



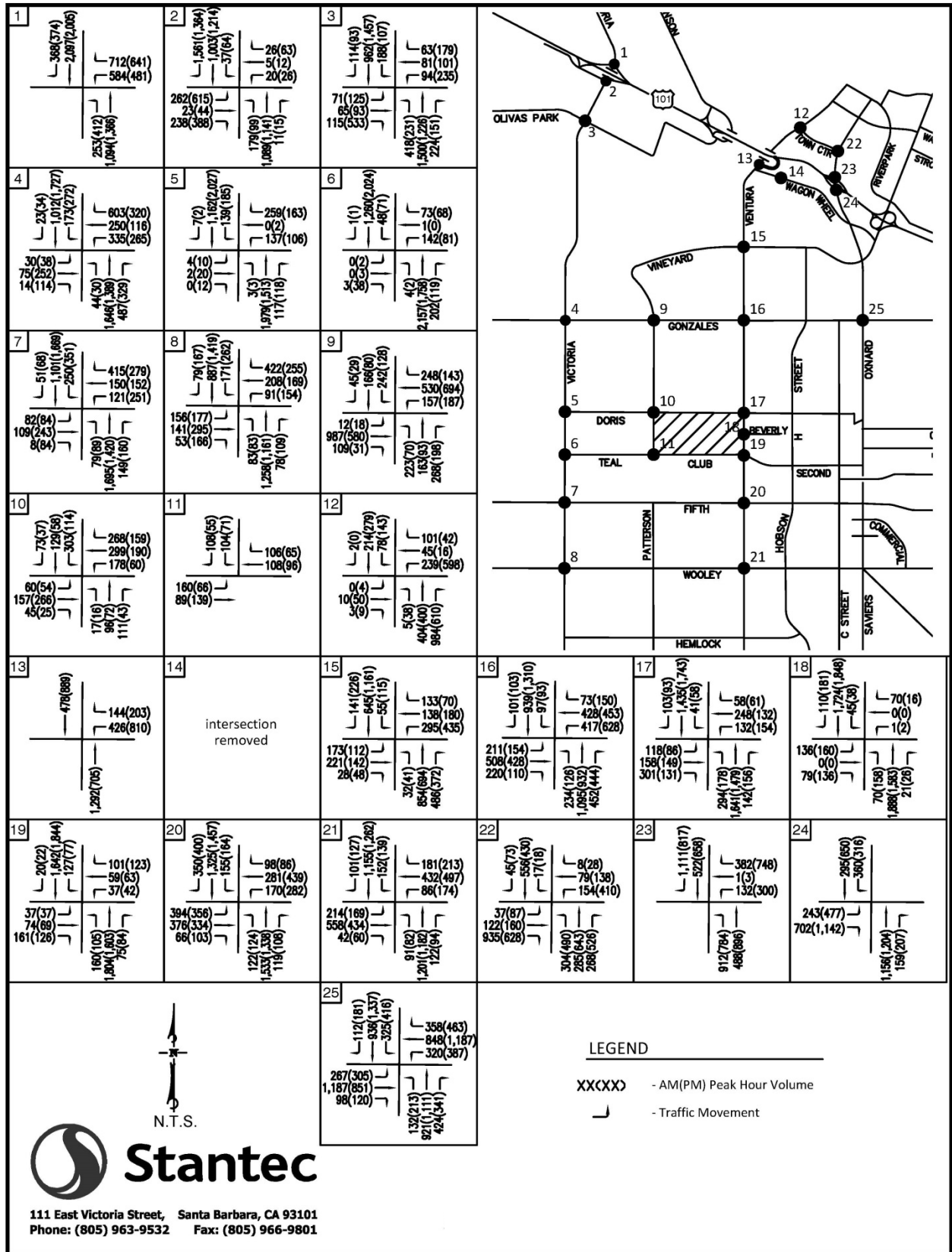
**Table 4.13-10
 Cumulative plus Project PM Intersection Levels of Service**

Intersection	PM Peak Hour				V/C or Delay Increase	Impact?
	Cumulative		Cumulative Plus Project			
	ICU/HCM	LOS	ICU/HCM	LOS		
1. Victoria Ave & US 101 NB Ramps	20.4 sec	C	20.5 sec	C	0.1 sec	No
2. Victoria Ave & Valentine Rd	0.70	B	0.72	C	0.02	No
3. Victoria Ave & Olivas Park Rd	0.74	C	0.76	C	0.02	No
4. Victoria Ave & Gonzales Rd	0.77	C	0.80	C	0.02	No
5. Victoria Ave & Doris Ave	0.80	C	0.81	D	0.01	Yes
6. Victoria Ave & Teal Club Rd	>50.0	F	>50.0	F	n/a	Yes
7. Victoria Ave & Fifth St	0.56	A	0.57	A	0.01	No
8. Victoria Ave & Wooley Rd	0.62	B	0.63	B	0.01	No
9. Patterson Rd & Gonzales Rd	0.44	A	0.45	A	0.01	No
10. Patterson Rd & Doris Rd (AWS)	11.7 sec	B	14.3 sec	B	2.6 sec	No
11. Patterson Rd & Teal Club Rd (TWS) ¹	10.3 sec	B	10.6 sec	B	0.3 sec	No
12. Ventura Rd & Town Center Dr	0.55	A	0.58	A	0.03	No
13. Ventura Rd & Wagon Wheel Dr	0.60	A	0.63	B	0.03	No
14. Wagon Wheel Dr & U.S. 101 SB off	Intersection Removed					
15. Ventura Rd & Vineyard Dr	0.50	A	0.53	A	0.03	No
16. Ventura Rd & Gonzales Rd	0.66	B	0.70	B	0.04	No
17. Ventura Rd & Doris Ave	0.79	C	0.68	B	n/a	No
18. Ventura Rd & Beverley Dr	>50.0	F	>50.0	F	n/a	Yes
19. Ventura Rd & Teal Club Rd	0.75	C	0.63	B	n/a	No
20. Ventura Rd & Fifth St	0.64	B	0.67	B	0.03	No
21. Ventura Rd & Wooley Rd	0.73	C	0.76	C	0.03	No
22. Oxnard Blvd & Town Center Dr	0.58	A	0.59	A	0.01	No
23. Oxnard Blvd & U.S. 101 NB Ramps	27.9 sec	C	30.8 sec	C	2.9 sec	No
24. Oxnard Blvd & U.S. 101 SB Ramps	23.0 sec	C	22.1 sec	C	0.1 sec	No
25. Oxnard Blvd & Gonzales Rd	0.68	B	0.71	B	0.03	No

¹ Project frontage improvement: intersection widening and geometry improvements under cumulative + project conditions
 Source: Stantec, 2019



Figure 4.13-6 Cumulative + Project AM and PM Peak Hour Intersection Volumes



Mitigation Measures. In addition to Mitigation Measure T-2(b) listed under Impact T-2, the following mitigation measures are recommended to reduce impacts to the applicable intersections.

- T-3(a) Victoria Avenue/Doris Avenue.** The project developer shall pay a fair share cost (estimated at 40%) towards implementing improvements to the Victoria Road and Doris Avenue intersection that add a third northbound through lane and a third southbound thru lane. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.
- T-3(b) Victoria Avenue and Teal Club Road.** The project developer shall pay a fair share cost (estimated at 23%) towards implementing improvements to the Victoria Avenue and Teal Club Road intersection to signalize the intersection and add a third southbound thru lane. To provide for acceptable service levels, installation of a third northbound and southbound through lane, consistent with the future planned widening of Victoria Avenue to Primary Arterial (six-lane) standards, would be required. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.
- T-3(c) Patterson Road and Doris Avenue.** The project developer shall pay a fair share cost (estimated at 21%) towards signaling the intersection of Patterson Road and Doris Avenue. To provide for acceptable operations, a traffic signal should be installed and a left-turn lane and shared through/right-turn lane should be provided on all approaches. This will require widening of the eastbound approach. The fair share cost shall be determined by the City's Traffic Engineering Division based on the project's trip generation and distribution. Improvements shall occur prior to occupancy clearance for any portion of Phase 2 development.

Significance After Mitigation. Because automobile delay may no longer be treated as a significant impact under CEQA, impacts would be less than significant without mitigation. Nonetheless, mitigation is recommended to mitigate intersection LOS to an acceptable LOS C. As shown in Table 4.13-11, with recommended mitigation measures all intersections would operate at an acceptable LOS level.



**Table 4.13-11
 Cumulative plus Project Mitigated Intersection Levels of Service**

Intersection	Mitigation Measure	Mitigated?	AM Peak Hour		PM Peak Hour		Proportionate Share
			Un-mitigated	Mitigated	Un-mitigated	Mitigated	
5. Victoria Ave/ Doris Avenue	T-3(a)	Yes	0.90/ LOS D	0.67/ LOS B	0.81/ LOS D	0.59/ LOS A	40%
6. Victoria Ave/ Teal Club Road	T-3(b)	Yes	>50.0/ LOS F	0.614/ LOS B	>50.0/ LOS F	0.59/ LOS A	23%
10. Patterson Rd/ Doris Ave	T-3(c)	Yes	>50.0/ LOS F	0.71/ LOS C	14.3/ LOS B	0.41/ LOS A	21%
18. Ventura Rd/ Beverly Dr	T-2(b)	Yes	>50.0/ LOS F	0.60/ LOS A	>50.0/ LOS F	0.67/ LOS B	100%

Unmitigated = Cumulative plus Project Unmitigated ICU – HCM/LOS

Mitigated = Mitigated HCM/LOS

Source: Stantec, 2019 (see Appendix I)

Impact T-7 Traffic generated by the proposed TCSP when added to Buildout (2030) traffic conditions would result in future levels of service that exceed City thresholds at four intersections. Mitigation is recommended to address this impact; however, automobile delay is no longer considered a significant impact in CEQA analysis. Impacts would be Class III, less than significant.

In December 2019 California’s Third District Court of Appeal ruled that under SB 743, automobile delay may no longer be treated as a significant impact in CEQA analysis (Citizens for Positive Growth & Preservation v. City of Sacramento).

Traffic volumes for City of Oxnard General Plan buildout conditions are derived from the City of Oxnard Traffic Model Year 2030 volumes and from the Future (2030) Traffic Volumes with Specific Plan Amendment contained in the Riverpark Project FEIR Addendum No. 1012. The 2030 Oxnard Traffic Model future (General Plan) intersection lane geometrics for the study-area intersections are shown in Figure 4.13-7. The analysis assumes that buildout of the General Plan street network includes signalization of the Victoria Avenue/Teal Club Road and Patterson Road/Doris Avenue intersections. The 2030 Oxnard Traffic Model peak hour traffic volumes with the Teal Club Specific Plan are shown in Figure 4.13-8.

Intersection levels of service were recalculated assuming buildout and buildout plus project conditions. Table 4.13-12 and Table 4.13-13 summarizes the buildout and buildout plus project level of service calculations. As shown in the table, the project could reduce LOS at the following intersections under buildout conditions:

- 7. Ventura Road/Doris Avenue
- 11. Patterson Road/Teal Club Road
- 17. Ventura Road/Doris Avenue
- 18. Ventura Road/Beverly Drive

The Oxnard Boulevard/U.S. 101 Northbound Ramps intersection would operate at the cusp of



LOS C/D during the PM peak hour, which is considered acceptable based on Caltrans standards. The Oxnard Boulevard/Gonzales Road intersection would operate in the LOS D range under buildout conditions. The City Council allows as an exception level of service D either in the AM or PM periods, or both, at this location in order to avoid adversely impacting private homes and/or businesses resulting from additional mitigation measures, or to preserve or enhance aesthetic integrity.

**Table 4.13-12
 Buildout plus Project AM Intersection Levels of Service**

Intersection	AM Peak Hour				V/C or Delay Increase	Impact?
	Buildout		Buildout plus Project			
	ICU/HCM	LOS	ICU/HCM	LOS		
1. Victoria Ave & US 101 NB Ramps	33.5 sec	D	37.2 sec	D	1.7 sec	No
2. Victoria Ave & Valentine Rd	0.76	C	0.77	C	0.01	No
3. Victoria Ave & Olivas Park Rd	0.67	B	0.68	B	0.01	No
4. Victoria Ave & Gonzales Rd ¹	0.81	D	0.83	D	0.02	Yes
5. Victoria Ave & Doris Ave	0.72	C	0.76	C	0.04	No
6. Victoria Ave & Teal Club Rd	0.64	B	0.67	B	0.03	No
7. Victoria Ave & Fifth St	0.57	A	0.58	A	0.01	No
8. Victoria Ave & Wooley Rd	0.64	B	0.66	B	0.02	No
9. Patterson Rd & Gonzales Rd	0.68	B	0.68	B	0	No
10. Patterson Rd & Doris Rd (AWS)	0.72	C	0.75	C	0.03	No
11. Patterson Rd & Teal Club Rd (TWS)	20.3 sec	C	28.4	D	8.1 sec	Yes
12. Ventura Rd & Town Center Dr	0.48	A	0.49	A	0.01	No
13. Ventura Rd & Wagon Wheel Dr	0.67	B	0.71	C	0.04	No
14. Wagon Wheel Dr & U.S. 101 SB off	Intersection Removed					
15. Ventura Rd & Vineyard Dr	0.55	A	0.57	A	0.02	No
16. Ventura Rd & Gonzales Rd	0.55	A	0.57	A	0.02	No
17. Ventura Rd & Doris Ave	0.74	C	0.78	C	0.04	No
18. Ventura Rd & Beverley Dr	<50.0	F	>50.0	F	n/a	Yes
19. Ventura Rd & Teal Club Rd	0.64	B	0.69	B	0.05	No
20. Ventura Rd & Fifth St	0.59	A	0.62	B	0.03	No
21. Ventura Rd & Wooley Rd	0.66	B	0.68	B	0.02	No
22. Oxnard Blvd & Town Center Dr	0.74	C	0.75	C	0.01	No
23. Oxnard Blvd & U.S. 101 NB Ramps	24.4 sec	C	24.5 sec	C	0.1 sec	No
24. Oxnard Blvd & U.S. 101 SB Ramps	19.0	B	19.0	B	0	No
25. Oxnard Blvd & Gonzales Rd	0.83	D	0.83	D	0	No

¹ Intersection analyzed assuming existing intersection lane geometry under General Plan Buildout conditions.
 Source: Stantec, 2019



**Table 4.13-13
 Buildout plus Project PM Intersection Levels of Service**

Intersection	PM Peak Hour				V/C or Delay Increase	Impact?
	Buildout		Buildout Plus Project			
	ICU/HCM	LOS	ICU/HCM	LOS		
1. Victoria Ave & US 101 NB Ramps	24.7 sec	C	25.5 sec	C	0	No
2. Victoria Ave & Valentine Rd	0.76	C	0.77	C	0.01	No
3. Victoria Ave & Olivias Park Rd	0.78	C	0.80	C	0.2	No
4. Victoria Ave & Gonzales Rd ¹	0.95	E	0.98	E	0.03	Yes
5. Victoria Ave & Doris Ave	0.70	C	0.74	C	0.04	No
6. Victoria Ave & Teal Club Rd	0.71	C	0.71	C	0	No
7. Victoria Ave & Fifth St	0.58	A	0.59	A	0.01	No
8. Victoria Ave & Wooley Rd	0.67	B	0.69	B	0.02	No
9. Patterson Rd & Gonzales Rd	0.52	A	0.52	A	0	No
10. Patterson Rd & Doris Rd (AWS)	0.45	A	0.51	A	0	No
11. Patterson Rd & Teal Club Rd (TWS)	12.9 sec	B	14.9 sec	B	2.0 Sec	No
12. Ventura Rd & Town Center Dr	0.71	C	0.72	C	0.01	No
13. Ventura Rd & Wagon Wheel Dr	0.72	C	0.74	C	0.04	No
14. Wagon Wheel Dr & U.S. 101 SB off	Intersection Removed					
15. Ventura Rd & Vineyard Dr	0.62	B	0.64	B	0.02	No
16. Ventura Rd & Gonzales Rd	0.71	C	0.75	C	0.04	No
17. Ventura Rd & Doris Ave	0.82	D	0.88	D	0.06	Yes
18. Ventura Rd & Beverley Dr	<50.0	F	>50.0	F	n/a	Yes
19. Ventura Rd & Teal Club Rd	0.57	A	0.62	B	0.05	No
20. Ventura Rd & Fifth St	0.75	C	0.78	C	0.03	No
21. Ventura Rd & Wooley Rd	0.79	C	0.80	C	0.01	No
22. Oxnard Blvd & Town Center Dr	0.77	C	0.72	C	0.01	No
23. Oxnard Blvd & U.S. 101 NB Ramps	33.9 sec	C	35.5 sec	D	1.4 sec	No
24. Oxnard Blvd & U.S. 101 SB Ramps	30.1 sec	C	20.4	C	0.3 Sec	No
25. Oxnard Blvd & Gonzales Rd	0.85	D	0.87	D	0.02	No

¹ Intersection analyzed assuming existing intersection lane geometry under General Plan Buildout conditions.
 Source: Stantec, 2019



Figure 4.13-7 Buildout Intersection Geometries

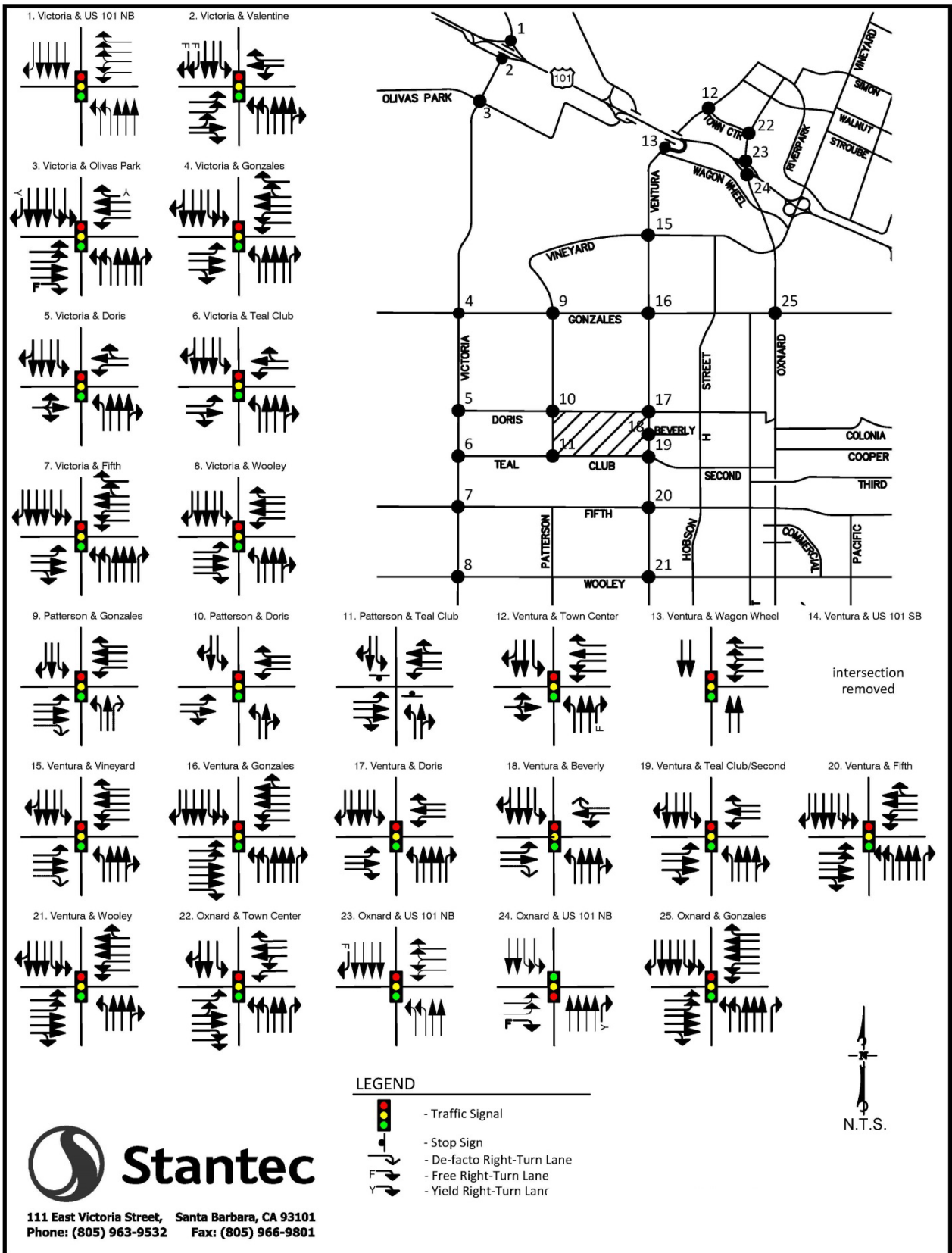
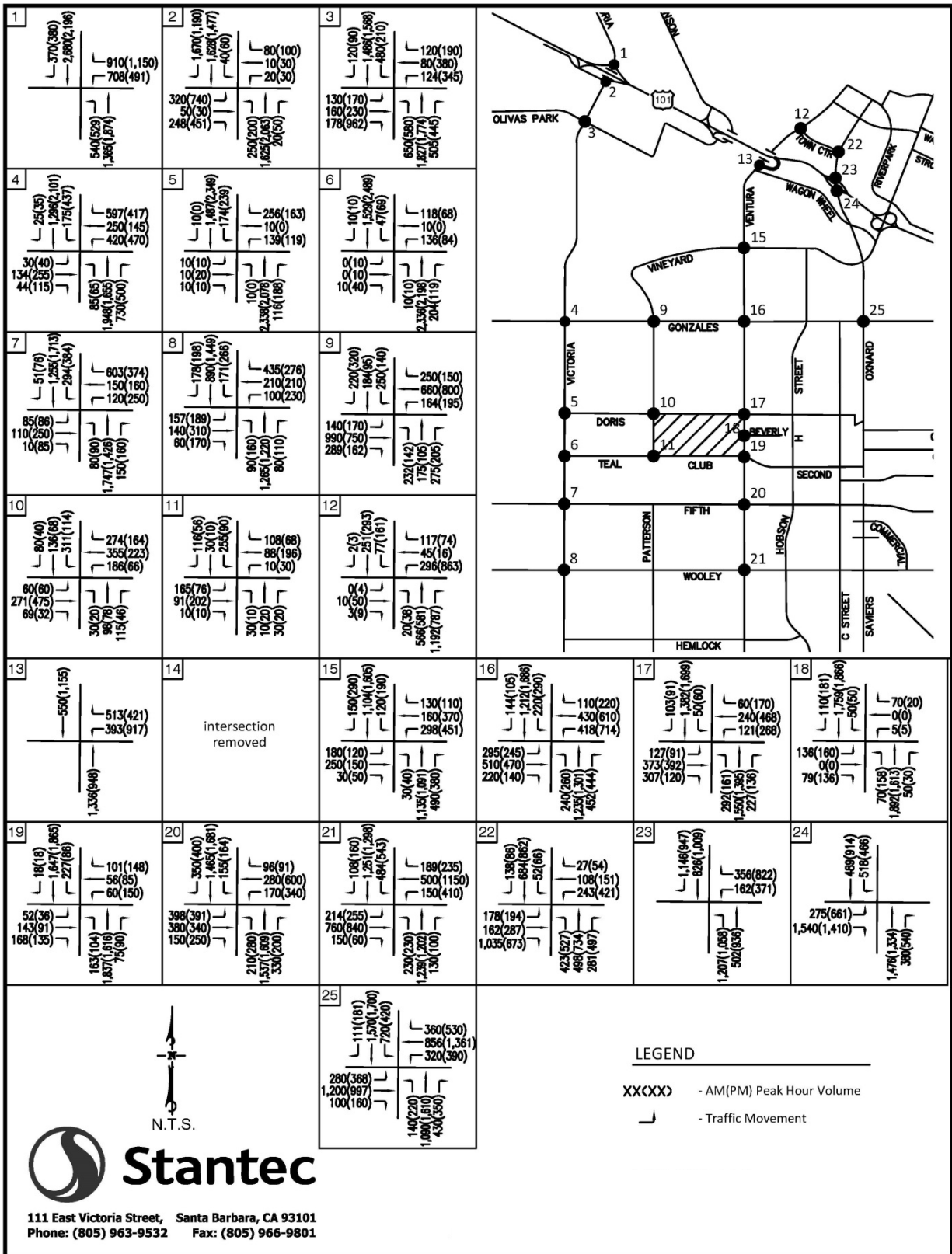


Figure 4.13-8 Buildout + Project AM and PM Peak Hour Intersection Volumes



Mitigation Measures. In addition to Mitigation Measure T-2(b) listed under Impact T-2, the following mitigation measures is recommended.

- T-4(a) Victoria Avenue/Gonzales Road.** The project developer shall pay a fair share cost (estimated at 10%) towards intersection improvements including conversion of the southbound right-turn lane to a shared through/right-turn lane, and conversion of the westbound #2 through lane to a shared through/right-turn lane. The fair share cost shall be determined by the City’s Traffic Engineering Division based on the project’s trip generation and distribution. Improvements shall occur in conjunction with the widening of Victoria Avenue south of Gonzalez Road to provide three southbound travel lanes.
- T-4(b) Patterson Road/Teal Club Road.** The project developer shall pay a fair share cost (estimated at 17%) towards signalizing the intersection of Patterson Road and Teal Club Road. The fair share cost shall be determined by the City’s Traffic Engineering Division based on the project’s trip generation and distribution.
- T-4(c) Ventura Road/Doris Avenue.** The project developer shall pay a fair share cost (estimated at 33%) towards reconfiguring the intersection to a dedicated left-turn lane, a through lane, and a shared through/right-turn lane. The fair share cost shall be determined by the City’s Traffic Engineering Division based on the project’s trip generation and distribution. Improvements shall occur prior to Phase 2 occupancy clearance.

Significance After Mitigation. Because automobile delay may no longer be treated as a significant impact under CEQA, impacts would be less than significant without mitigation. Nonetheless, mitigation is recommended to mitigate to an acceptable LOS C. As shown in Table 4.13-14, with implementation of recommended Mitigation Measure T-2(b) and mitigation measure T-4(a) through T-4(c), the intersections would operate at an acceptable LOS level.

**Table 4.13-14
 Buildout plus Project Mitigated Intersection Levels of Service**

Intersection	Mitigation Measure	Mitigated?	AM Peak Hour		PM Peak Hour		Fair Share
			Unmitigated	Mitigated	Unmitigated	Mitigated	
4. Victoria Ave/ Gonzales Rd	T-4(a)	Yes	0.83/ LOS D	0.69/ LOS B	0.98/ LOS E	0.77/ LOS C	10%
11 Patterson Rd/ Teal Club Road	T-4(b)	Yes	28.4/ LOS D	0.40/ LOS B	14.9/ LOS B	0.26/ LOS A	17%
17 Ventura Rd/ Doris Ave	T-4(c)	Yes	0.78/ LOS C	0.76/ LOS C	0.88/ LOS D	0.79/ LOS C	33%
18. Ventura Rd/ Beverly Dr	T-2(b)	Yes	>50.0/ LOS F	0.59/ LOS A	>50.0/ LOS F	0.68/ LOS B	100%

Unmitigated = Buildout plus Project Unmitigated ICU – HCM/LOS

Mitigated = Mitigated HCM/LOS

Source: Stantec, 2019 (see Appendix I)



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4.14 UTILITIES AND ENERGY

This section analyzes potential impacts to City of Oxnard utilities, including water supply and associated conveyance infrastructure, wastewater conveyance and treatment infrastructure, storm drain infrastructure, and solid waste disposal systems. This section is partially based on the TCSP’s Water Supply Assessment prepared by Milner-Villa Consulting in October 2019 (included in Appendix J) and the *Teal Club Development Infrastructure Review* prepared by Kennedy/Jenks in 2007 (included in Appendix K).

4.14.1 Setting

a. Water Supply. The environmental setting for water supply provided in this subsection is based on a project specific water supply assessment (WSA), titled *Water Supply Assessment Teal Club Development*, prepared by Milner-Villa Consulting and dated October 2019 (Appendix J). The WSA analyzes the sufficiency of the City’s water supplies to serve the proposed TCSP, in addition to the demands of the City’s existing and planned future customers. The WSA describes the City’s current and planned future water supplies, which are summarized below.

City Water Supplies. The City uses two sources of water to serve its customers: local groundwater and imported surface water. With very few exceptions, all City customers receive a blend of these two supplies through a combination of: (1) City-owned groundwater wells; (2) groundwater purchased through a long-term contract with United Water Conservation District (UWCD); and (3) imported surface water purchased through a contract with Calleguas Municipal Water District (CMWD). The proportion of groundwater to imported water in this blend changes based on the supplies available to the City at any given time.

Water Supply Sources. This subsection summarizes the information presented in the WSA regarding the City’s various sources of supply and discusses associated environmental or reliability issues. Table 4.14-1 summarizes the current and projected sources of water for the City of Oxnard.

**Table 4.14-1
 Summary Projected Water Supplies**

Projected Water Supplies (AFY)	2020	2025	2030	2035	2040
Ground Water – City Produced	14,186	21,186	21,186	21,186	21,186
Ground Water – Purchased from UWCD	7,329	7,329	7,329	7,329	7,329
Imported Surface Water – Purchase from CMWD	11,826	11,826	11,826	11,826	11,826
Recycled Water – City Produced	7,000	14,000	14,000	14,000	14,000
Total Estimated Water Supplies	40,341	54,341	54,341	54,341	54,341

Source: Milner-Villa Consulting, *Teal Club WSA*, 2019

Imported Water

Metropolitan Water District (MWD) of Southern California. MWD obtains the water that it imports from two major sources: the Colorado River and the State Water Project (SWP) operated by the California Department of Water Resources (DWR). For planning purposes,



MWD based the imported water supply projections contained in its 2016 Regional Urban Water Management Plan (2016) on the 2015 SWP Reliability Report.

State Water Project. Oxnard receives imported surface water from the SWP via CMWD. The SWP is the largest state-built, multi-purpose water project in the country. The SWP is owned by the State of California and operated by the DWR. The primary purpose of the SWP is to deliver water to 29 urban and agricultural water suppliers in Northern California, the San Francisco Bay Area, the San Joaquin Valley, the Central Coast, and Southern California, including 20 million urban users and 750,000 acres of farmland. Of the contracted water supply, approximately 70% serves urban users and 30% serves agricultural users.

SWP Reliability. The amount of SWP water delivered to MWD and other SWP contractors in a given year depends on a number of factors, including the demand for the supply, amount of rainfall, snowpack, runoff, water in storage, pumping capacity from the Delta, and legal/regulatory constraints on SWP operation. Water delivery reliability depends on three general factors: the availability of water, the ability to convey water to the desired point of delivery, and the magnitude of demand for the water. Urban SWP contractors' requests for SWP water, which were low in the early years of the SWP, have been steadily increasing over time.

DWR prepares a biennial report titled, "State Water Project Delivery Capability Report." This report assists SWP contractors in assessing the reliability of the SWP component of their overall supplies. The SWP Capability Report 2017 (January 2018) provides DWR's estimate of the current (2017) and future (2035) water delivery reliability of the SWP. The updated analysis shows that the primary component of the annual SWP water deliveries from the Delta (commonly referred to as Table A deliveries) will be less under current and future conditions, when compared to the preceding 2015 report.

Contractors' requests for their water entitlements cannot always be met. In some years there are shortages and in other years surpluses. It was thought at the time that the SWP was constructed that the system could deliver about 50% of its entitlement in a very dry year. In 2019, SWP contractors received 3,145,105 acre-feet (af; 75%) of their SWP Table A allocations (DWR, 2019) Deliveries for the 2012-2016 period averaged 1,500,000 af (35%) for Table A allocations.

The SWP Reliability Report 2017 (December 2017) provided a projection of DWR's water delivery reliability for current (2017) scenario and future (2033) scenario. The SWP Reliability Report 2017 indicated that the SWP, using existing facilities operated under current regulatory and operational constraints and future anticipated conditions, and with all contractors requesting delivery of their full Table A allocations in most years, could deliver 50% of Table A allocations on a long-term average basis. However, in a single dry-year (worst case scenario) DWR estimated delivery of an average of only 8% of Table A allocations. In a four-year drought scenario, DWR estimated delivery of an average of 16% of Table A allocations.

SWP Water Quantity Challenges. The focal point of SWP supplies is the Bay-Delta; the largest estuary on the west coast through which 60% of the freshwater used in the state must pass. In recent years, the Delta smelt, winter-run Chinook salmon, spring-run Chinook salmon, and splittail, all of which are present in the waters of the Bay-Delta, were added as threatened or



endangered species under the federal Endangered Species Act (ESA). Resulting actions taken to protect these species and the wider ecosystem of the Bay-Delta have placed additional restrictions on SWP operations.

SWP Water Quality Challenges. SWP water is generally of high quality. Total dissolved solids (TDS) concentrations range between 250 and 350 milligrams per liter (mg/L). The quality of SWP water as a drinking water source is affected by a number of factors, most notably seawater intrusion and agricultural drainage from peat soil islands in the Bay-Delta.

The water quality parameters of most concern are total organic carbon (TOC), bromide, and salinity. Levels of TOC and bromide in the water increase substantially as it moves through the Bay-Delta. These constituents can combine with chemicals used in the water treatment process to form disinfection byproducts that are carcinogenic. Treated wastewater discharged from cities and towns surrounding the Bay-Delta also add salts and pathogens to the water, which affect its suitability for drinking and recycling. Moreover, actions to protect Bay-Delta fisheries have exacerbated existing water quality problems by forcing SWP diversions to shift from the spring to the fall, when salinity and bromide levels are highest. Closure of the Delta Cross Channel gates to protect migrating fish has also degraded the quality of SWP supplies by reducing the flow of higher quality Sacramento River water.

Calleguas Municipal Water District. CMWD purchases SWP water from MWD. MWD delivers water to CMWD via the West Valley Feeder, which is either stored in Lake Bard to be re-treated before distribution or is fed directly to the Springville Reservoir near Camarillo. The water supply projections detailed in CMWD's 2010 UWMP are based on MWD's SWP supply projections, along with anticipated local supplies (Milner-Villa, 2014).

City Imported Water Supply Projections. The City receives SWP water from CMWD's Springville Reservoir through the City's Oxnard and Del Norte Conduits which feed five of the City's six water blending stations. In 2015, the City purchased approximately 10,612 acre-feet (af) of water from CMWD (Milner-Villa, 2019). Of this amount, approximately 700 af were distributed directly to the Port Hueneme Water Agency (PHWA) in exchange for an equal amount of PHWA local groundwater allocations.

Local Supplies.

Local Basin Overview. Within the Oxnard Forebay Groundwater Basin and the Oxnard Plain Groundwater Basin, there are two primary aquifer systems of importance to the City:

- Upper Aquifer System (UAS) – The UAS consists of the semiperched zone, the Oxnard Aquifer, and the Mugu Aquifer.
- Lower Aquifer System (LAS) – The LAS is comprised of the Hueneme, Fox Canyon, and Grimes Canyon Aquifers.

The Forebay Basin is an important part of the aquifer system, where the aquifers come together and are unconfined. The Forebay Basin is recharged from the Santa Clara River, including water that is diverted from the river to UWCD's spreading basins. The Forebay Basin is hydraulically connected to the aquifers in the Oxnard Basin. Thus, the primary recharge to the Oxnard Basin



is from the underflow from the Forebay Basin, rather than from deep percolation of water from surface sources on the Oxnard Plain (Milner-Villa Consulting, 2014).

For further detailed information about the aquifers in the area, see Appendix J.

Fox Canyon Groundwater Management Agency. Groundwater supplies upon which the City relies are regulated through a legislatively created groundwater management agency – the Fox Canyon Groundwater Management Agency (FCGMA). The FCGMA has jurisdiction over the main groundwater supply aquifers for the City: the Oxnard Forebay and the Oxnard Plain Basins.

The FCGMA controls groundwater pumping through an allocation system. Each municipal and industrial groundwater user within the FCGMA, including the City, has an established groundwater pumping allocation, which the FCGMA monitors. FCGMA policy also allows groundwater users to “bank” any unused groundwater allocation in the form of credits. For example, if the City limits its groundwater use to less than its annual allocation, it earns a conservation credit. These credits may be used to offset any pumping in subsequent years to avoid payment of the GMA surcharge. However, Emergency Ordinance E, adopted in April 2014, states that, “...conservation credits shall not be obtained and may not be used to avoid paying surcharges for extractions while this emergency ordinance is in effect.” Emergency Ordinance E also imposes additional pumping restrictions within the FCGMA boundary. These reductions include an additional 10% on July 1, 2014, additional 5% on January 1, 2015, and additional 5% on July 1, 2015.

In addition to its own groundwater allocation, the City holds a water supply contract (the Oxnard Hueneme Pipeline Water Supply Contract) with UWCD. Pursuant to this contract, UWCD holds FCGMA allocations for the benefit of the City. UWCD exercises this allocation when it delivers groundwater to the City from UWCD wells in the Forebay Basin.

Several other features of the FCGMA allocation and credit regulatory program are also important to the overall water supply and reliability assessment for the City. First, the FCGMA grants the City additional groundwater allocation when the City takes over water service responsibility for newly developed lands. For example, when agricultural lands are converted to municipal uses (commercial, industrial or residential uses, for example), the City obtains additional allocation. When the City takes over service responsibility to property already committed to municipal uses, the City takes over the existing allocation and credits previously dedicated to those lands.

Along with the regulatory tools described above, the FCGMA also promotes responsible groundwater management through the implementation of its Groundwater Management Plan. The FCGMA updated its operative Groundwater Management Plan in May 2007.¹ Although the Management Plan contains a wide variety of programs which will further the FCGMA’s goals of preserving the local groundwater basin resources, there are two cornerstone strategies articulated in the Plan: a) aggressive development and use of recycled water in lieu of groundwater, and b) reducing local groundwater pumping in certain areas that are difficult to

¹ The FCGMA Management Plan, May 2007. A copy of the FCGMA Management Plan is available for review at the City of Oxnard Planning and Environmental Services Division located at 214 South C Street Oxnard, California.



recharge and are prone to localized over-pumping. Instead, these stressed areas are supplied with alternative sources (e.g., recycled water, surface water or groundwater obtained from areas easily recharged). In turn, the conservation credits developed from the reduced pumping in the stressed areas are transferred for use in and around the Oxnard Forebay Basin because the Forebay is easily recharged.

GREAT Program. Complete implementation of the City's Groundwater Recovery Enhancement and Treatment (GREAT) Program will provide approximately 20,000 acre-feet per year (afy) of additional assured water supplies to the City.

The existing Oxnard Wastewater Treatment Plant (OWTP) currently produces approximately 23 million gallons per day (mgd), or about 25,800 afy, of secondary treated wastewater and discharges the effluent to the Pacific Ocean through its ocean outfall. The GREAT Program will make beneficial use of up to 90% of treated wastewater resources through advanced treatment and subsequent reuse through a number of mechanisms including:

- Advanced Water Treatment. The City constructed an Advanced Water Purification Facility (AWPF) at the existing OWTP, to produce a high quality recycled water product which meets State Water Resources Control Board (formerly California Department of Public Health (CDPH)) criteria for groundwater recharge, agricultural and municipal uses. The AWPF will receive secondary treated effluent from the OWTP and treat it with microfiltration, reverse osmosis, and ultraviolet advanced oxidation. The AWPF has a production capacity of 6.25 mgd of recycled water. The first phases of the AWPF and the Recycled Water Backbone System (RWBS) have been completed.
- Recycled Water Delivery System. The recycled water delivery system will deliver water to all of the following:
 - Municipal and industrial uses, both existing and new;
 - Agricultural properties; and
 - Groundwater injection for subsequent extraction through aquifer storage and recovery wells.
- Groundwater Desalination. Local groundwater contains higher levels of total dissolved solids (TDS) than imported water purchased from CMWD. To maintain the current water quality provided to City customers, the GREAT Program includes desalters that remove dissolved minerals from pumped local groundwater. This allows the City to increase the overall percentage of groundwater compared to imported water in its potable water supplies. The GREAT Desalter was constructed in 2007 to 2008 and began operation in 2009. The GREAT Desalter includes low pressure reverse osmosis units with 6.25 mgd capacity. Three newer wells currently pump water from the poor quality Oxnard Aquifer and feed the Desalter (Oxnard UWMP, 2015).
- Concentrate Collection System. Although not yet constructed, the concentrate collection system would divert some portion of the highly degraded water entering the OWTP. Instead, this waste stream would bypass the treatment system and be disposed directly



through the City's ocean outfall. This system would improve the efficiency of operation of both the OWTP and the AWPf.

In June 2013, the Fox Canyon Groundwater Management Agency passed Resolution No. 2013-02 which outlined conditions for the City of Oxnard to utilize recycled water to create a new category of groundwater pumping credit. The FCGMA approved the City to accrue up to 5,200 AFY of "Recycled Water Pumping Allocation" (RWPA). The City can accrue one acre-foot of RWPA for each acre-foot of recycled water use that results in one acre-foot decrease in groundwater pumping by recycled water users. The FCGMA Resolution identified specific conditions for the City to accrue the RWPA. In addition, the FCGMA Resolution states that the City can extract up to 8,000 AFY of RWPA. Required monitoring and reporting conditions are included in the Resolution.

Recycled Water. The City's recycled water system obtains source water from the City's OWTP. The OWTP is a secondary treatment plant located at 6001 S. Perkins Road in the City of Oxnard. All treated effluent is currently discharged to the Pacific Ocean (Millner-Villa Consulting, 2019). The OWTP has an average dry weather flow (ADWF) design capacity of 31.7 mgd (35,500 afy) with provision for an ultimate ADWF design capacity of 39.7 mgd (44,500 afy). Current flow to the OWTP is 23 mgd (25,800 afy).

The City is working on completing recycled water agreements (agriculture, commercial, and municipal), recycled water retrofits (retrofits for existing customers to allow dual plumbing; use of potable and or recycled water), recycled water storage, power backup at the AWPf, and additional recycled water distribution pipelines. The first phase of the AWPf and the Recycled Water Backbone System (RWBS) have been completed. In 2015, the City sold approximately 605 AFY of recycled water for golf course irrigation. Future expansions of the AWPf and the Recycled Water System will be developed when funding becomes available. Recycled water will be a key component of the City's future water supply strategy.

The City plans to implement an aquifer storage and recovery (ASR) program. This proposed program would include construction of new wells to inject up to 6,000 acre-feet per year of high quality recycled water into local aquifers. The recycled water would meet all requirements of the California indirect potable reuse regulations. The City would then extract and treat the water at existing City facilities in times of high potable water demand. In addition, the City plans to implement a direct potable reuse program starting in 2025, whereby up to 5,000 AFY (by 2040) of high-quality recycled water is mixed with potable water within the distribution system.

United Water Conservation District. UWCD manages groundwater and delivers water to cities and agriculture within an area of approximately 330 square miles within Ventura County.

UWCD diverts Santa Clara River water at the Vern Freeman Diversion Dam southeast of Saticoy and delivers a portion of the water to the Saticoy and El Rio Spreading Grounds and to agricultural users on the Oxnard Plain. Water percolated in these spreading basins recharges the Forebay Basin and the Oxnard Plain Basin. Eleven UWCD wells are then used to extract the water and deliver it to customers along the O-H Pipeline. Of the eleven wells, three extract



water from the LAS, and eight extract water from the UAS. Water extracted by these wells is delivered to the El Rio Pumping Station, disinfected, and pumped to customers through the O-H Pipeline.

UWCD currently provides 29% (7,344 afy in 2015) of the City's water supply. Table 4.14-1 indicates that the City has purchased approximately 7,344 afy from UWCD in 2015. This arrangement has been in place since 1954, and was formalized in the 1996 Water Supply Agreement for Delivery of Water through the Oxnard-Hueneme Pipeline. UWCD holds a pumping sub-allocation for all users of the O-H Pipeline, which includes the City, PHWA, and a number of small mutual water companies.

UWCD also maintains FCGMA groundwater credit subaccounts for each of its contractors, including the City. As of December 31, 2010 the City had a balance of 10,863 af of credit available through the UWCD sub-allocation. See subsection 4.14.1(a)(ii)(B) as to the status of these credits at this time.

Table 4.14-1 indicates that the City anticipates having nearly 40,341 afy of available water supplies in 2020, with available water supplies increasing to nearly 54,341 afy by 2040. The City anticipates purchasing 7,329 afy of groundwater from UWCD each year for the period 2020 to 2040.

City Groundwater. Local groundwater is generally extracted from the aquifers of the Oxnard Plain Groundwater Basin. The City's baseline groundwater pumping allocation is 936 afy. The historical groundwater pumping allocation is approximately 8,146 afy, after 2010 when the FCGMA 25% reduction was fully realized (Milner-Villa Consulting, 2019).²

In addition to the City's baseline groundwater pumping allocation, in 2009 the City participated in the Good Deed Credit Trust Program. As part of that program the City helped UWCD purchase an additional recharge basin known as the Ferro Pit. In return, UWCD provided a one-time transfer of 11,000 af of Good Deed Credit Trust groundwater allocation to the City. The Good Deed Credit Trust Program provides an additional 1,000 afy of allocation to the City through 2019.

The City also participates in the 2002 Three Party Agreement Water Supply Agreement, which includes the City, CMWD, and PHWA. The Agreement is valid until 2036 and states that PHWA can transfer allocation or credits to the City. The City obtains an annual transfer of 700 afy of FCGMA credits from PHWA via this Agreement. These credits result from reduction in pumping of PHWA member agency wells as a result of the operation of PHWA's Brackish Water Reclamation Demonstration Facility.

After the City extracts groundwater, the water is mixed (blended) with imported water or desalted water at the City's blending stations. Groundwater pumping capacity is a function of aquifer condition as well as the condition of the well, pumping equipment, and groundwater levels. Table 4.14-1 indicates that City wells provided 26% (7,442 afy) of the City's water supply in 2010. The City has produced an average of approximately 6,732 afy over the period 2006 to

² These figures do not take into account allocations for properties with private wells that develop and convert to City water.



2010 (Milner-Villa Consulting, 2014). The City anticipates pumping approximately 9,100 to 10,800 afy of groundwater for the period 2015 to 2035 (see Table 4.14-1).

Projected Citywide Water Demand. Table 4.14-2 shows the estimated water demand projection for the City through the year 2040. These estimates were developed by the City Planning Division and used to update and supplement information included in the 2010 UWMP water demand projections.

**Table 4.14-2
 Current and Projected City Water Demand (afy)**

	2015 ¹	2020	2025	2030	2035	2040
Total Demand	26,028	39,664	48,054	49,445	50,835	52,225

Source: Milner-Villa Consulting, Teal Club WSA, 2019

¹ 2015 demand represents actual consumption, 2020-2040 data projected based on the City's 2015 UWMP

Projected Water Supply Balance. Tables 4.14-3 through 4.14-5 provide a comparison of the water supply and demands for a normal, single dry, and multiple dry water years as provided in the WSA. They show that for all water years from 2015 – 2040 the City's supplies are sufficient to meet projected demand. It should also be noted that estimates of water demand are highly conservative and include a contingency factor. The City utilized SWP delivery estimates for future SWP water supply reliability based on best available data from DWR, MWD, and CMWD.

**Table 4.14-3
 Projected Supply and Demand Comparison – Normal Year**

	2020	2025	2030	2035	2040
Total Estimated Supplies	40,341	54,341	54,341	54,341	54,341
Total Estimated Demand	39,664	48,054	49,445	50,835	52,225
Difference = Supply - Demand	677	6,287	4,287	3,506	2,116

Source: Milner-Villa Consulting, Teal Club WSA, 2019

**Table 4.14-4
 Projected Supply and Demand Comparison – Single Dry Year**

	2020	2025	2030	2035	2040
Total Estimated Supplies	29,247	52,867	52,867	52,867	52,867
Total Estimated Demand with Conservation	34,213	36,667	37,146	37,446	38,782
Difference = Supply - Demand	9,785	12,442	12,384	12,029	9,938

Source: Milner-Villa Consulting, Teal Club WSA, 2019



**Table 4.14-5
 Projected Supply and Demand Comparison – Multiple Dry-Years**

	2020	2025	2030	2035	2040
Year 1 Total Estimated Supplies	38,756	52,206	52,206	52,206	52,206
Year 1 Total Estimated Demand	39,664	48,054	49,445	50,835	52,225
Year 1 Difference = Supply – Demand	(908)	4,152	2,761	1,371	(19)
Year 2 Total Estimated Supplies	38,426	51,762	51,762	51,762	51,762
Year 2 Total Estimated Demand	39,664	48,054	49,445	50,835	52,225
Year 2 Difference = Supply – Demand	(1,238)	3,708	2,317	927	(463)
Year 3 Total Estimated Supplies	36,383	49,009	49,009	49,009	49,009
Year 3 Total Estimated Demand	39,664	48,054	49,445	50,835	52,225
Year 3 Difference = Supply – Demand	(3,281)	955	(436)	(1,826)	(3,216)

Source: Milner-Villa Consulting, Teal Club WSA, 2019
 () denotes subtraction

Water Transmission and Distribution Infrastructure. The City's water transmission and distribution system consists of a wide variety of pipe types and sizes; asbestos cement pipe (ACP), polyvinyl chloride (PVC) pipe, and cast iron pipe (CIP) are the most common.

Pipelines in the vicinity of the project area include 16-inch and 20-inch pipelines along the eastern boundary of the project area under Ventura Road, a 12-inch pipeline along the southern boundary of the project area under Teal Club Road, and a 12-inch pipeline along the northern boundary of the project area under Doris Avenue.

The primary sources of water for the TCSP would be Blending Station Nos. 1 and 3, located approximately 1 mile to the southeast and 3 miles to the northeast of the project area, respectively. These two blending stations combine water from City groundwater wells, CMWD, UWCD, and groundwater treated at the City's GREAT Desalter facility.

The City takes delivery of water from CMWD via the Springville Reservoir through the City's Oxnard and Del Norte Conduits. These connections have a total rated flow capacity of 50 cfs under normal operating conditions, which equals approximately 22,500 gallons per minute (gpm) or 36,200 afy if run continuously at maximum capacity. There are no deficiencies in the CMWD or City water distribution systems that would limit the availability of water supplies to serve the TCSP.

b. Wastewater. The Wastewater Section of the City Public Works Department owns, operates, and maintains wastewater collection and treatment infrastructure in the City, including over 300 miles of sewer pipelines and 16 wastewater pumping stations. The collection system conveys flow to the OWTP. The majority of the flow in the system is conveyed through the Ventura Road, Rose Avenue, Redwood, Western, Central, and Eastern trunk sewers. The OWTP has a current capacity of 31.7 mgd with average daily flows of approximately 23 mgd.

The project area is served by the 21-inch Western Trunk Sewer that flows south along Patterson Road then west along Teal Club Road, and by the 42-inch Redwood Trunk Sewer that flows south along Ventura Road (Kennedy/Jenks Consultants, 2007). The Redwood Trunk Sewer was designed to relieve the former Ventura Trunk Sewer and to open up capacity along the Central



Trunk Sewer. It was also designed to accept flows from future growth as projected under full buildout of the 2030 General Plan. The Redwood Trunk Sewer is currently operating below capacity. The Western Trunk Sewer is currently operating near design capacity (Kennedy/Jenks Consultants, 2007).

c. Solid Waste Disposal. The City of Oxnard provides solid waste collection and recycling service to residences and businesses within the City. Solid waste collected in Oxnard is taken to the City-owned and operated Del Norte Regional Recycling and Transfer Station, a material recovery and waste transfer 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 recyclable materials include aluminum, glass, paper, metals, plastics, wood, and yard waste. The MRF also accepts some appliances (e.g. refrigerators and air conditioners) and tires. The permitted capacity of the MRF is 2,779 tons per day (CalRecycle, 2014).

Solid waste that cannot be recycled is taken to either the Toland Road Landfill east of Santa Paula or the Simi Valley Landfill. The Toland Road Landfill, a Class II municipal landfill operated by the Ventura County Sanitation District, has a permitted capacity of 1,500 tons of solid waste per day. The landfill's projected closure date is 2027 (CalRecycle, 2016). The Ventura Regional Sanitation District, which operates the Toland Road Landfill, is proposing changes to the landfill operations to remove the 15,000 tons per day maximum permitted disposal rate and replace it with a condition that allows a maximum daily tonnage to be based on the capacity of 15 heavy truck trips per day as well as remove the 2027 closure date. These changes have not yet been approved. The Simi Valley Landfill is a private facility operated by Waste Management, Inc. with a daily capacity of 9,250 tons of solid waste. The projected closure date for the Simi Valley Landfill is January 31, 2052.

The City's Environmental Resources Division runs the City's Waste Reduction and Education programs, which are designed to achieve the State-mandated waste diversion goals. Waste diversion programs include both residential and business recycling programs, tailored to meet the needs of individual customers. In 2019, the maximum allowable per capita disposal was 11.2 pounds per person per day. Oxnard's disposal was calculated as 9.2 pounds/person/day. Therefore, the City exceeds State diversion requirements.

d. Storm Water. The Preliminary Drainage Report for the proposed TCSP (RBF Consulting, 2007), which is included in Appendix G, describes the existing terrain of the TCSP area as generally flat with a very gradual slope towards the southwest corner of the site. Runoff flow patterns are defined by the layout of the several separate farm fields and the general slope to the southwest. Under existing conditions, surface drainage in the TCSP area flows along the plowed row crops to shallow unlined drainage ditches. Flows are then conveyed under onsite unpaved access roads by small diameter culverts of various sizes and materials. The cumulative site drainage is directed toward a 24" arched corrugated metal pipe culvert under Patterson Road at the southwest corner of the site. This culvert outlets into an open unlined drainage ditch, which runs west to Victoria Avenue along the north side of Teal Club Road.

e. Electricity and Natural Gas. The Southern California Gas Company (SCG) provides natural gas service to the project area. SCG's service territory encompasses approximately 20,000 square miles from Visalia and San Luis Obispo to the Mexican border. SCG provides



natural gas to 20.9 million customers in this area through 5.8 million meters (Southern California Gas Company, 2012). The availability of natural gas service is based upon conditions of gas supply and regulatory agencies.

Southern California Edison (SCE) provides electrical service throughout Southern California, including the Oxnard area. SCE maintains a large network of transmission and distribution infrastructure throughout the area in order to provide electrical power and service to its customers. On an average day SCE provides power to nearly 14 million people in a 50,000 square-mile service area encompassing 11 counties in central, coastal and Southern California. It also provides power to commercial, industrial and nonprofit customers, including 5,000 large businesses and 280,000 small businesses. SCE delivers this power, through 16 utility interconnections, 4,990 transmission and distribution circuits, 425 transmission and distribution crews, and more than 15,500 employees (Southern California Edison, 2012).

f. Regulatory Setting.

Water Supply. The federal Clean Water Act (CWA) establishes regulatory requirements for potable water supplies including raw and treated water quality criteria. Oxnard is required to monitor water quality and conform to the regulatory requirements of the CWA. The federal Safe Drinking Water Act (SDWA) establishes standards for contaminants in drinking water supplies. Maximum contaminant levels and treatment techniques are established for each of the contaminants. The listed contaminants include metals, nitrates, asbestos, total dissolved solids, and microbes.

California enacted its own Safe Water Drinking Act in 1976. The California State Water Resources Board, Division of Drinking Water (DDW) has been granted primary enforcement responsibility for the SWDA. Title 22 of the California Administrative Code stipulates drinking water quality and monitoring standards. These standards are equal to or more stringent than federal standards.

Senate Bill 610 (Costa) was signed into law in 2001. This law requires cities and counties to develop water supply assessments when considering approval of applicable development projects in order to determine whether projected water supplies can meet the project's anticipated water demand. Since the proposed project involves the development of 990 residential units and approximately 60,000 square feet of retail, mixed use and office space, and approximately 132,000 square feet of business park space, it required the preparation of a water supply assessment.

The State Water Board adopted an emergency mandatory urban water conservation regulation (Resolution No. 2015-0032) on May 5, 2015. Under the adopted regulation, the City of Oxnard is required to cut its water usage by 12%. The provisions of the emergency regulation went into effect on May 15, 2015.

The FCGMA has 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. The primary FCGMA regulatory tool is Ordinance 8.1.³ In meeting its goals in managing the local groundwater basins, the FCGMA has also adopted several resolutions and recently updated its Groundwater Management Plan.

The FCGMA's primary groundwater preservation program is embodied in its comprehensive ordinance code, requiring: a) all groundwater wells to be registered with the agency, b) all groundwater use to be reported to the agency, and c) limits on the amount of groundwater that may be pumped from within the agency's jurisdiction without the payment of a pumping surcharge (financial payment currently set at \$725 per acre foot).⁴ FCGMA has prepared Groundwater Sustainability Plans for the Oxnard Subbasin, Pleasant Valley Basin, and Los Pinos Valley Basin.

As noted previously, Emergency Ordinance E requires additional pumping restrictions within the FCGMA boundary and currently restricts the use of groundwater conservation credits.

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 acre-feet per year (af/yr) for retail or wholesale uses are required to submit an Urban Water Management Plan (UWMP) every five years to the California Department of Water Resources (DWR). 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. UWMPs are prepared by California's urban water suppliers to support their long-term resource planning and to ensure that reliable and adequate water supplies are available to meet existing and future water demands over a 20-year planning horizon during normal, single-dry and multiple-dry year periods. The City of Oxnard's most recent UMPW is the 2015 UWMP, adopted in 2016.

In 2018, AB 1668 and SB 606 were enacted and lay out a new long-term water conservation framework for California. Programs and initiatives are organized around four primary goals: (1) Use water more wisely, (2) Eliminate water waste, (3) Strengthen local drought resilience, and, (4) Improve agricultural water use efficiency and drought planning. This legislation applies to the actions of DWR, the [State Water Resources Control Board](#) (State Water Board), and water suppliers. It does not set any standards or rules for individual use (DWR 2020).

Articles VIII, Water Waste, and IX, Water Conservation and Water Shortage Response Procedures, of the Oxnard City Code, approved by the City establish permanent water conservation standards to maximize water use efficiency for non-shortage conditions and provide response actions implemented during water shortage conditions.

As defined in the Oxnard City Code, during a declared water shortage condition the water sources available to the City will be put to the maximum beneficial use to the greatest extent

³ A copy of the FCGMA Ordinance 8.1 is available for review at the City of Oxnard Planning and Environmental Services Division located at 214 South C Street Oxnard, California.

⁴ See Ordinance 8.1



possible. Priorities for use of available water, based on California Water Code, include the following:

- Health and Safety: Interior residential, sanitation and fire protection;
- Commercial, Industrial, and Governmental: Maintain jobs and economic base;
- Existing Landscaping: Especially trees and shrubs; and
- New Demand: Projects with permits when shortage declared.

The waste or unreasonable use of water will be prevented, and water supplies available will be conserved for public welfare in the interests of City residents. The primary purpose of Article IX of the Oxnard City Code is to provide response actions for use during water shortages, including procedures that will significantly reduce the consumption of City water over an extended period of time. The aim is to extend the water available to City residents while reducing the hardship on the City and the general public to the greatest extent possible.

As per Article IX of the Oxnard City Code, after determining the severity of the water shortage emergency, the City Council will establish, by resolution, water conservation goals by stages. Immediately after adoption of a City Council resolution declaring the water conservation goals, water allocations will be in effect and customers will be prohibited from using water in excess of their allocation. Each customer will be solely responsible for managing his/her water uses in such a manner as to not exceed the amount of water allocated. Percentage reduction stages and goals will be in effect with the first full billing period commencing on or after the effective date of the City Council resolution adopting a water shortage plan. During a water shortage emergency, the City Manager will take specific actions in response to the failure of any customer to comply with established water use restrictions.

On July 29, 2014, the Oxnard City Council declared a Stage Two drought. This action prohibits and imposes a range of water conservation measures that are designed to reduce consumption of potable water in a variety of uses. Residents, commercial establishments, municipal and schools are required to implement the following water conservation measures:

- The use of running water from a hose, pipe, or faucet to clean buildings, pavement, tile, wood, plastic, driveways, parking lots, and other paved surfaces, is prohibited, except for compelling public health and safety reasons. If allowed, a hose with a positive shut-off nozzle must be used;
- All restaurants that provide table service shall post, in a conspicuous place, a notice of water shortage conditions and shall refrain from serving water except upon specific request by a customer;
- Use of potable water to fill or refill recreational or ornamental lakes, ponds or fountains is prohibited;
- Operators of hotels, motels, and other commercial establishments offering lodgings shall post in each room a notice of water shortage conditions, encouraging water conservation practices;
- Any use of water that causes runoff to occur beyond the immediate vicinity of use is prohibited;
- Watering of lawns, ornamental turf, trees, shrubs, vegetation, landscape and other outside irrigation 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 saving, no more than twice a week. Use of a hand held hose with positive shut-off nozzle, bucket, or micro irrigation systems/equipment is encouraged;

- Irrigation is permitted for ground cover for fire protection purposes and erosion control;
- Boats and vehicles shall be washed only at commercial wash facilities that recycle their wash water, or by use of a bucket and hose equipped with a self-closing valve that requires operator pressure to activate the flow of water, or by mobile high pressure/low volume professional services;
- Watering to maintain the level of water in swimming pools shall occur only when necessary. A pool cover shall be used to conserve water when the pool is not in use. Draining of pools or refilling shall be done only for health or safety reasons;
- Irrigation of parks, school ground areas, and road median landscaping will not be permitted more than twice a week and only if necessary.

On January 15, 2008, the City Council 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. This policy ensures that development approval will take place at the pace anticipated in the 2010 UWMP so that the growth in water demand does not exceed available supply. 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.

Additionally, the Oxnard City Council established a water demand “neutrality” policy. All new development approved within the City must 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 occurring in the City. 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.

Wastewater. As authorized by the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. NPDES permits are required for operators of industrial facilities, including wastewater treatment plants.

Solid Waste. The California Integrated Waste Management Act of 1989 (AB 939), required each city or county’s source reduction and recycling element to include an implementation schedule showing that a city or county must divert 50% of solid waste from landfill disposal or transformation on and after January 1, 2000. SB 1016, passed in 2008, now requires the 50% diversion requirement to be calculated in a per capita disposal rate equivalent.



AB 341 set a new statewide diversion goal of 75 percent by 2020 and requires that any organization generating four (4) or more cubic yards of waste a week, or multi-family residences of five (5) or more units, engage in recycling services (effective July 1, 2012). AB 827 requires a business subject to either AB 341 or AB 1826, and that provides customers access to the business, to provide customers with a recycling bin or container for that waste stream that is visible, easily accessible, adjacent to each bin or container for trash other than that recyclable waste stream, except in restrooms, and clearly marked with educational signage, as specified. Full-service restaurants, as defined, are exempted from its requirements, as specified (effective July 1, 2020).

AB 1327 requires commercial or multifamily developments of 5 units or more to include adequate, accessible and convenient areas for collecting and loading recyclable materials. SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. It establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025 (effective January 1, 2020).

AB 1826 requires that any organization generating two (2) or more cubic yards of waste on a weekly basis (as of January 1, 2020), or multi-family residences of five (5) or more units, to engage in organic recycling services (effective April 1, 2016).

Electricity and Natural Gas. As public utilities, SCG and SCE 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 and is willing to pay for the service and comply with the utility’s rules and regulations.

City of Oxnard. The following Implementation Measures related to utilities are included in the Oxnard 2030 General Plan.

- CD 7-10** *Urban Village Infrastructure Master Plans. Require an Urban Village Infrastructure Master Plan as part of any urban village specific plan. This plan shall provide the detailed plan for infrastructure improvements, phasing and financing.*

- 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.*
- ICS 11-12** *Water for Irrigation. Require the use of non-potable water supplies for irrigation of landscape and agriculture, whenever available.*

In addition, the City's water demand neutrality policy would apply to the proposed TCSP, as referenced in subsection 4.4.1.a(vi).

4.14.2 Environmental Impact Analysis

a. Methodology and Significance Thresholds. The analysis of impacts to utilities involved: (1) Incorporation of the findings of the Milner-Villa Consultants, *Water Supply Assessment Teal Club Plan Project*, prepared in August 2019; (2) Incorporation of the findings of City of Oxnard and Kennedy/Jenks Consultants, *Teal Club Development Infrastructure Review – Evaluation of Potable Water Facilities, Evaluation of Wastewater Facilities and Evaluation of Recycled Water Facilities*, prepared in May 2007 and the Jensen Design and Survey, Inc., *Teal Club Specific Plan Sewer Study*, prepared in January 2014 ; and (3) review of relevant documents, including the City of Oxnard official website, Water System Master Plan, 2030 General Plan, and Teal Club Specific Plan. Solid waste generation was based on land use/generation rates available from the California Integrated Waste Management Board. Impacts were evaluated based upon the City's 2017 CEQA Thresholds.

Impacts to utilities are considered significant if the project would:

1. *Require additional wastewater conveyance or treatment capacity to serve project demand and existing commitments;*
2. *Require new or expanded water supply entitlements to serve the project that are not anticipated in the current Urban Water Management Plan;*
3. *Generate solid waste that would exceed the permitted capacity of a landfill serving the City;*
4. *Not comply with federal, state, and local statutes and regulations related to solid waste;*
5. *Involve wasteful, inefficient, or unnecessary consumption of energy during project construction, operation, maintenance, and/or removal;*
6. *Require additional energy facilities, the provision of which may have a significant effect on the environment;*
7. *Inconsistent with existing energy standards; or*
8. *Preempt future energy development or future energy conservation, or inhibit the future use or renewable energy or energy storage.*



The proposed Development Agreement that is part of the project would provide the framework for financial commitments paid to the City and would not change the physical elements of the project or result in physical environmental effects.

b. Project Impacts and Mitigation Measures. Table 4.14-6 lists the thresholds under consideration in the utilities and energy analysis and whether the impact was found to be significant and unavoidable (Class I), significant but mitigable (Class II), less than significant (Class III), or beneficial (Class IV).

**Table 4.14-6
 Summary of Traffic Utilities and Energy Conclusions**

Would the project:	Significant and Unavoidable (Class I)	Significant but Mitigable (Class II)	Less than Significant (Class III)	Beneficial (Class IV)
1. Require additional wastewater conveyance or treatment capacity to serve project demand and existing commitments?			X	
2. Require new or expanded water supply entitlements to serve the project that are not anticipated in the current Urban Water Management Plan;?		X		
3. Generate solid waste that would exceed the permitted capacity of a landfill serving the City?			X	
4. Not comply with federal, state, and local statutes and regulations related to solid waste?			X	
5. Involve wasteful, inefficient, or unnecessary consumption of energy during project construction, operation, maintenance, and/or removal?			X	
6. Require additional energy facilities, the provision of which may have a significant effect on the environment?			X	
7. Inconsistent with existing energy standards?			X	
8. Preempt future energy development or future energy conservation, or inhibit the future use or renewable energy or energy storage?			X	

Impact UTL-1 The proposed TCSP would generate an estimated 235,140 gallons of wastewater per day, which would flow to the Oxnard Wastewater Treatment Plant. The local treatment plant would have sufficient capacity to treat this increase in wastewater and local conveyance infrastructure would have sufficient capacity to convey flows from the site. Therefore, this impact is considered Class III, *less than significant*.

Wastewater Treatment. This analysis is based in part on the *Teal Club Development Infrastructure Review*, which was completed by Kennedy/Jenks Consultants in May 2007 (see Appendix K). Table 4.14-7 shows estimated wastewater flows generated by buildout of the TCSP based on its proposed land uses. Peak wet weather wastewater flow would be 368 gpm and peak dry weather wastewater flow would be 295 gpm. Wastewater flows would average 235,140 gallons per day (gpd) or about 0.23 mgd.



As discussed in subsection 4.14.1b, OWTP has a current capacity of 31.7 mgd with average daily flows of approximately 23.0 mgd. Thus, there is a current surplus capacity of approximately 8.7 mgd. The estimated 0.23 mgd of wastewater generated by buildout of the TCSP would account for approximately 2.7% of the OWTP’s surplus capacity. Therefore, there would be sufficient capacity to accommodate the flows from full buildout of the TCSP. The OWTP treats wastewater in compliance with Regional Water Quality Control Board requirements. All wastewater from the TCSP would be treated so as to meet or exceed these requirements.

**Table 4.14-7
 Project Generated Wastewater Flows**

Land Use	Acreage	Wastewater Duty Factor (gpad)	Wastewater Flow (gpd)	Wastewater Flow (gpm) ²
Single Family Residential	27.53	1,365	37,578.45	26.09
Multi-Family Residential	45.78	2,380	108,956.4	75.66
Commercial	8.78	1,350	11,853	8.23
Total Average Daily Flow			120,809.4	83.89
Total Peak Dry Weather Flow (PDWF = 1.81)¹			218,665.01	151.85
RDI/I	175.14	600	105,080	73
Total Peak Wet Weather Flow			323,745.01	224.82

Source: Kennedy/Jenks Consultants, Teal Club Development Infrastructure Review – Evaluation of Wastewater Facilities, May 2007.

gpad = gallons per acre per day

gpd = gallons per day

gpm = gallons per minute

RDI/I = Rainfall Dependent Inflow/Infiltration

¹ The peak dry weather factor was calculated using the following equation as given in the 2005 Draft Oxnard Wastewater Master Plan Update: Peak Dry Weather Factor = 1.73 x (Average Dry Weather Flow Rate)^{-0.0337}. This produced a Peak Dry Weather Factor of 1.81 for the average day flow resulting in a Peak Dry Weather Flow of 312 gpm.

² The gallons per minute was calculated using by dividing gallons per day by 1,440 (the number of minutes in a day).

Wastewater Conveyance. As part of the 2005 Oxnard Wastewater Master Plan Update, Kennedy/Jenks Consultants developed a computer model to simulate wastewater system performance and to identify deficiencies under various peak flow scenarios. The two scenarios used for design were peak wet weather flows under existing conditions and peak wet weather flows under buildout conditions. The buildout scenario for the wastewater model was assumed to be 2020.

The Teal Club Development Infrastructure Review (Kennedy/Jenks Consultants, 2007) explored several alternatives for routing sewer flows from the TCSP area to the sewer system:

- Alternative 1 -Western Trunk Option: Drain all flows by gravity to Manhole AY+01 of the Western Trunk Sewer at the intersection of Patterson and Teal Club Roads near the southwest corner of the Teal Club property.
- Alternative 2- Teal Club Pump Relief Sewer and Pump Station Option: Pump all Teal Club flows along Teal Club Road to Manhole AAA+061 along the Redwood Trunk Sewer at the intersection of Ventura and Teal Club Roads near the southwest corner of the Teal Club property.



- Alternative 3 - Regional Relief Sewer and Pump Station Option: Pump all flows upstream of Manhole AY+01 along the Western Trunk Sewer including Teal Club flows to Manhole AAA+061 along the Redwood Trunk Sewer. This alternative would require verification that it would eliminate the need to upsize pipes along the Western Trunk Sewer south of Manhole AY+01.
- Alternative 4 - Flow Split Option: Convey, if hydraulically possible and feasible, a portion of Teal Club flows to the Redwood Trunk Sewer by gravity.

The existing diameters of the sewers serving the parcels comprising the TCSP area, as well as the sewers conveying the flows downstream, are presented in Tables 4-3 and 4-4 of the *Teal Club Development Infrastructure Review* (see Appendix K). Based on the simulated flows of the model, it was determined that much of the existing wastewater conveyance system would be inadequate to meet the needs of the proposed TCSP. This is based on the fact that while the Redwood Trunk Sewer has the capacity to absorb flows from the proposed TCSP, existing topography and hydraulics on the site are unsuitable for gravity flow. As part of the proposed TCSP, the topography of the site would be adjusted via the import of 100,000 cubic yards of fill, which would be used to raise the central portion of the site approximately 5 feet in elevation in order to provide sewer line cover and allow gravity flow. Up to 50% of the sewer flows would be directed to the Redwood Trunk sewer via gravity flow, with a peak flow of 0.91 cfs. A peak flow of 0.56 cfs would flow to the Victoria Trunk Line, located west of the project site. As shown in the sewer study prepared by Jensen Design and Survey (2014), depths of flow in the Western Trunk Sewer would remain in compliance with City standards after construction of the proposed TCSP is complete and no downstream deficiencies would be increased by the proposed TCSP. Therefore, installation of new wastewater conveyance infrastructure beyond what is proposed as part of the TCSP would not be required and impacts to wastewater conveyance would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Impacts are less than significant without mitigation.

Impact UTL-2 Buildout under the proposed TCSP would generate an estimated water demand of about 447 acre feet per year. The City's projected water supply is expected to be adequate to serve the TCSP demands through the Year 2040. Impacts would be Class II, significant but mitigable.

The TCSP area is currently in active agriculture use and is planted with row crops. The existing water demand is served by private wells located on the property. Based on groundwater extraction data from the wells that serve the TCSP area, average annual water use is approximately 475 afy with a maximum year water use of 744 afy in 1990 (Milner-Villa, 2019).

Based on a conservative estimate using high daily demand factors provided by City of Oxnard staff, water demand from the proposed TCSP would total about 477 afy. Potable water demands from residential uses would account for an estimated 377 afy and commercial and industrial uses would account for an estimated 44 afy. Once available, recycled water demand from commercial and business development uses would account for an estimated 3.9 afy, and park



and landscaping would account for an estimated 14.9 afy. Table 4.14-8 provides a water demand summary for the proposed TCSP.

**Table 4.14-8
 Estimated Project Water Demand**

Land Use	Acres ¹	Daily Demand Factor (gpad) ²	Total Annual Demand (afy)
Potable Water Demand			
Residential – Low Density	27.53	2,250 per acre	69.4
Residential – Medium and High Density	45.78	6,000 per acre	307.7
Light industrial ³	9.11	2,800 per acre	28.6
Commercial/mixed use ⁴	8.78	1,600 per acre	15.7
<i>Total Potable Water Demand</i>			421.4
Recycled Water Demand			
Residential – Low Density ⁵	27.73	0	0
Residential – Medium and High Density ⁵	45.78	0	0
Light Industrial ³	9.11	700 per acre	7.1
Commercial/mixed use ⁴	8.78	400 per acre	3.9
Park and Landscaping	17.76	750 per acre	14.9
<i>Total Recycled Water Demand</i>			26.0
Total Water Demand			447

Notes: All values rounded.

Source: Milner-Villa Consulting, Teal Club WSA, 2019;

¹ See Section 2.0, Project Description. Project also includes approximately 41 acres of interior roadways and storm water detention basins.

² Oxnard, 2007, Teal Club Development Infrastructure Review, Tables 3-1 and 3-2.

³ Demand represents 3,500 gpad with 80% potable water for indoor uses and 20% recycled water for landscape irrigation.⁴ Demand represents 2,000 gpad with 80% potable water for indoor uses and 20% recycled water for landscape irrigation.

⁵ City of Oxnard does not currently approve of recycled water to be piped to single-family and multiple-family residential parcels.

As described in detail in subsection 4.14.1 (a)(ii), the City’s existing and ongoing water management programs provided about 40,341 afy to serve the water needs of the City in 2020. Table 4.14-1 provides a summary of water supply sources for the City, projected for the years 2015 through 2040.

Based on Table 4.14-8, the TCSP’s total estimated water demand (447 afy) would be about 1.7% of the City’s water usage in 2015 (26,028 afy; see Table 4.14-2) and about 0.9% of the City’s estimated 2040 total water demand (52,225 afy; see Table 4.14-2).

The applicant anticipates compliance with the City's Water Neutrality Policy. The applicant will transfer groundwater allocations to the City upon final approval of the TCSP. The FCGMA Ordinance Code allows an allocation of one acre-feet per year per acre for converting historical agricultural groundwater allocations to municipal allocations (FCGMA Ordinance Code, Section 5.3.3). Therefore, the applicant will transfer approximately 500 afy to the City.

Based on the analysis provided in the City's Urban Water Management Plan (Oxnard, 2016), the City’s total projected normal water-year water supplies available through the year 2040 will generally meet the City’s projected water demands, including the proposed project, within the



service area. Under single dry water-year conditions (see Table 4.14-4 for details), the City anticipates that projected supplies would meet projected demands including the project, in most years through the year 2040. For multiple dry water-year conditions, the City's projected water resources would meet the projected water demands including the project, in most years through the year 2040 (see Table 4.14-5 for details). During years when deliveries of existing water supplies are below normal, the City anticipates implementing multiple strategies including but not limited to the following: 1) obtaining additional water resources via supplemental local ground water extractions, 2) additional purchases from local and regional suppliers, and 3) increasing water conservation and demand management measures.

The proposed project would utilize local and sustainable water resources, including City potable water and City recycled water for landscape irrigation. The City has sufficient water supplies available to serve the project from existing entitlements and resources during normal water-years (Oxnard, 2016). These water supplies are available via treated local ground water, imported surface water from the SWP, and recycled water. The proposed project would transfer approximately 500 AFY of ground water extraction allocations to the City via agriculture land converted to urban uses. This transfer would result in creating additional ground water extraction allocations (i.e., exceeding demands) and potential additional revenue for the City. The proposed project would not require additional ground water or surface water purchases from local or imported sources. The proposed project would not require or result in the construction of significant additional City water facilities or expansion of existing facilities. Thus, the project would potentially be water neutral with respect to use of potable water and recycled water.

Based on the above, projected City water demands, which include the proposed project, could be met by existing water supplies and transfer of groundwater sources from agricultural activities to the City. Since the timing of development of the City's planned sources and GMA approval of transfer of water credits is not certain at this time, impacts would be potentially significant and mitigation would potentially be required.

Mitigation Measures. The following mitigation measures would be required to address potentially significant impacts to water supply if the water transfer credits are not approved.

UTL-2(a) Availability of Recycled Water. In order to ensure that the proposed TCSP or the area on the site south of Teal Club Road does not draw from Phase I AWPf recycled water, the City shall confirm that planned additional AWPf capacity is at least 50% funded and engineering plans are 25% completed before any building permits for the first phase of the TCSP or the area on the site south of Teal Club Road are issued and/or adequate alternative new water are available.

UTL-2(b) On-site Recycled Water System. The recycled water system serving the TCSP area and the area on the site south of Teal Club Road shall include the following:

- Pipeline extension from the mainline in Ventura Road to the property. The developer shall be responsible for either



constructing the line or payment of fees to the City for its construction.

- A recycled water system that serves all practical irrigated areas and which is: (1) separated from the domestic water system; (2) constructed per the City's Recycled Water Construction Standards; (3) irrigated at night; and (4) properly signed. Note that the signs shall be installed once the system is fully operational.
- Mainline shall be a public system with meters, as appropriate, to recycled water customers. The developer shall be responsible for the design and construction of the recycled water main pipeline system within the development. Construction shall be per City standard requirements with payment of applicable fees.
- Separate meters for the portion of the irrigated area intended for the future recycled water system and the portion of the system that will not be connected to the future recycled water system, if any.
- Until the recycled water system is operational, the common area irrigation system shall be connected to the domestic system. Once recycled water is available, and connection to the recycled water system is made, the developer shall remove the connection to the domestic water system.
- Prior to the availability of recycled water, the developer shall be responsible for payment of the Recycled Water Connection Fee or the water connection fee, whichever is greater for facilities constructed.
- At such time as recycled water is available, the developer shall be responsible for all costs involved with the re-connection of the applicable portions of the irrigation system to the public recycled water system, including appropriate signage. Credits for connection fees shall be given by the City based on the size of the meter(s). Under no circumstance will there be a refund of water connection fees already paid.
- The developer shall be responsible for appropriate CCRs covering the use of recycled water within the property and for proper disclosures.

UTL-2(c)

Exterior Water Conservation. The developer shall incorporate into the TCSP and the area on the site south of Teal Club Road the following exterior water conservation features in order to reduce water demand to the greatest extent feasible, with a goal of at least 30% water use reduction compared to traditional turf landscaping. These shall include, but are not limited to:

- Landscape of common areas with low water-using plants (i.e., drought tolerant plant species);
- Weather-based irrigation controllers for all landscaped areas;



- Minimize the use of turf by limiting it to lawn dependent uses; and,
- Wherever turf is used, install warm season grasses.

UTL-2(d)

On-site Domestic Water System. The on-site domestic water system shall include:

- For the TCSP, connections to the City's system in at least two locations as approved by the City, generally located along the eastern side of the property (Ventura Road) and along either the north or south side of the development away from Ventura Road. There shall be an on-site looped main transmission system through the development. For the area of the site south of Teal Club Road, configuration of the on-site domestic water system will be determined in consultation with the City and meet City design requirements.
- Public pipeline systems which feed into separate water meters for each ownership. In addition, there shall be separate water meters for each multi-family unit.
- An internal water system designed to provide for the higher of either maximum day plus fire or peak hour demand.

UTL-2(e)

Water Neutrality. To ensure that the proposed TCSP and the area of the site south of Teal Club Road meets the objectives of the City's Water Neutrality Policy, the City shall confirm, at the time individual phases of the project are reviewed and at the time development of the area of the site south of Teal Club Road is proposed, that the FCGMA allocation transfer rate in place is sufficient to meet the water demand of the phase/area under consideration. Additional water demand above the amount of transferred supply, shall be provided by the applicant to offset the net additional water demand associated with the project. This shall be accomplished through a Water Neutrality Plan to be reviewed and approved by the City prior to issuance of any building permit. The Water Neutrality Plan shall contain any combination of the following measures, or other measures suggested by the Applicant, that are quantifiable, permanent offsets of existing potable water use elsewhere in the City, or bring new water supply to the City, that match or exceed potable water shortfall:

- a. Use recycled water for indoor residential uses, including but not limited to, toilet flushing;
- b. Use recycled water for indoor business park and commercial and industrial elements of the project including, but not limited to, toilet and urinal flushing, process uses and air conditioning.
- c. Contribute to expansion of the City's water conservation program, such as but not limited to offsets available through



- programs such as toilet exchange and showerhead replacements;
- d. Provide to the City financial contributions towards City programs which generate in-City water conservation or recycled water capacity or conveyance not otherwise required by another State or local water conservation program;
 - e. Participate in other similar programs with cumulatively result in an adequate water supply contribution; and
 - f. Provide to the City water supplies equal to the shortage amount.

The City shall ensure implementation of the approved plan in all aspects of permitting and construction of individual phases addressed in the plan.

Significance After Mitigation. Following implementation of the above measures, the TCSP would have a less than significant impact on water supply.

Impact UTL-3 Current water system infrastructure would meet the City of Oxnard's water service pressure requirements and the Fire Department's fire flow requirements. Impacts would be Class III, less than significant.

The City's Standard Plans for Public Works Construction 2002 Edition delineates minimum hydrant and water flow requirements. The requirements for residential and industrial/commercial areas are summarized below:

- Residential – Fire flow of 2,500 gpm at 20 pounds per square inch (psi); 500-foot fire hydrant spacing for single family residential with no structure more than 300-feet from a hydrant; 300-foot fire hydrant spacing for multi-family residential with no structure more than 200-feet from a hydrant.
- Industrial/commercial - Fire flow of 4,500 gpm at 20 psi; 300-foot fire hydrant spacing for single family residential with no structure more than 150-feet from multiple hydrants (on-site included).

Based on the type of development proposed in the TCSP, including three story residential buildings, the City of Oxnard Fire Department has set the fire flow requirements for this analysis as shown in Table 4.14-9 (Kennedy/Jenks, 2007). This flow must be available under maximum day conditions with a residual of 20 psi (flow pressure of fire hydrants must not drop below 20 psi).



**Table 4.14-9
 Fire Flow Requirements**

Use Type	Flow (gpm)	Pressure (psi)
SF1 Single Family 1	1,500	20
SF2 Single Family 2	2,500	20
GC General Commercial	2,500	20
HC Heavy Commercial	3,500	20
MF Multi Family	3,000	20
CBD Commercial Business District	4,000	20
M/I Manufacturing/Industry	4,500	20

Source: Kennedy/Jenks Consultants, Teal Club Infrastructure Review 2007.

The 2007 Teal Club Infrastructure Review, included as Appendix K, determined that under fire flow conditions there is existing fire flow availability on the site of 4,500 gpm and an ultimate fire flow availability of 4,000 gpm. This exceeds the requirements set by the Oxnard Fire Department. Impacts would be less than significant.

Mitigation Measures. No mitigation is required.

Significance After Mitigation. Water pressure in the TCSP area exceeds fire flow and water service pressure requirements. Impacts would be less than significant.

Impact UTL-4 The proposed TCSP would generate an estimated 2,383 tons of solid waste per year. This is within the existing capacity of solid waste disposal facilities serving the City. Therefore, this impact would be Class III, less than significant.

Table 4.14-10 shows the estimated solid waste that would be generated by buildout of the proposed TCSP. The proposed TCSP would generate an estimated 2,383 tons of solid waste per year, or about 6.5 tons per day.

As discussed in *Setting*, existing City recycling programs are currently achieving a citywide diversion rate of about 67%. The Toland Road Landfill has capacity for 1,500 tons of solid waste per day, while the Simi Valley Landfill has capacity for 9,250 tons per day. With the expected 67% diversion rate, the amount of solid waste from the proposed TCSP sent to area landfills would be reduced to approximately 2.15 tons per day, accounting for about 0.1% and less than 0.02% of the daily capacities of Toland Road Landfill and Simi Valley Landfill, respectively. Both of these landfills would have adequate capacity to accommodate waste generated by the proposed TCSP.



**Table 4.14-10
 Projected Solid Waste Generation**

Land Use	Unit	Solid Waste Generation Factor ^a	Projected Solid Waste	
			Daily (tpd) ^b	Annually (tpy) ^c
Single Family Residential	328 units	12.23 lbs/unit/day	2.0	730
Multi-Family Residential	662 units	12.23 lbs/unit/day	4.0	1,460
Commercial	60,000 sf	5 lbs/1000 sf/day	0.15	54.8
Industrial	132,000 sf	5 lbs/1000 sf/day	0.33	120
Total			6.53	2,383

^a The California Integrated Waste Management Board Solid waste generation factors were used in the analysis.

<http://www.ciwmb.ca.gov/WasteChar/WasteGenRates/>

^b tpd = tons per day

^c tpy = tons per year

The proposed TCSP would be required to participate in existing City recycling programs. The City requires:

1. Preparation of a Waste Management Plan that details how materials generated during construction will be managed to achieve the 65% diversion requirement per CalGreen standards. This plan must be prepared and submitted to the Environmental Resources Division prior to the issuance of a building permit.
2. Submission of a Waste Management Report that verifies how materials generated during construction were managed to achieve the 65% diversion requirement. Certified weight slips or receipts must be submitted with the report to provide confirmation of diversion activity. This report must be submitted prior to issuance of a certificate of occupancy.
3. Preparation of an Occupancy Plan that details how waste reduction, recycling and organics diversion programs will be implemented on site. The plan must explain how tenants will be educated about the programs and encouraged to participate. It must also provide information on the entities that will be providing collection services for all material required to be diverted from disposal per state law. This plan must be submitted prior to issuance of a certificate of occupancy.

The Solid Waste Division also requires annual reports on what is actually recycled during occupancy.

Based on the above, the waste generated by the proposed TCSP would not adversely affect solid waste disposal facilities and impacts related to solid waste disposal facilities would be less than significant.

Mitigation Measures. As discussed above, local landfills would have adequate capacity to accept solid waste generated under full buildout of the proposed TCSP. No mitigation is required.

Significance After Mitigation. Impacts would be less than significant without mitigation.



Impact UTL-5 The project would result in use of substantial amounts of electricity and natural gas. However, compliance with General Plan policies and mitigation measures would avoid wasteful or inefficient use of energy, ensure consistency with existing energy standards, and would not preempt future energy development or conservation. Impacts would be Class III, *less than significant*.

The proposed TCSP and new development in the additional annexation area would result in the use of electricity and natural gas. The project would allow for the construction of up to 990 residential units (net increase of 982 units), 132,000 square feet of business park and Urban Village Commercial space and 17.8 acres of community and neighborhood parks. Energy would be consumed throughout the construction and operation of such new development, in addition to energy consumption associated with existing development in the additional Annexation area. Energy would be required during construction with the transportation of building materials, manufacturing of building materials, and the actual construction of buildings and infrastructure. During operation, energy would be consumed for purposes including but, not limited to, building heating and cooling, use of consumer products, lighting, and vehicular traffic.

As noted in Sections 4.3, Air Quality, 4.6, *Greenhouse Gas Emissions*, and 4.14, *Utilities and Service Systems*, the City of Oxnard 2030 General Plan contains goals and policies relating to energy efficiency. Specifically, Policies SC-3.1, SC3.8, and SC-4.1 call for the use of passive energy and resource conservation design and devices, and implementation of California Green Building Code standards in new building construction throughout the City. The City's Energy Action Plan in 2013 sets a reduction target of 10% below the 2005 baseline for electricity and natural gas consumption.

In February 2019, all residents in the City of Oxnard were automatically enrolled in Clean Power Alliance, a community choice energy program providing renewable electric energy transported and delivered via existing Southern California Edison infrastructure (City of Oxnard 2019). During project operation, residential electricity customers would receive renewable electric energy from Clean Power Alliance, consistent with City General Plan and Energy Action Plan goals and policies. Furthermore, with implementation of Mitigation Measures AQ-2(b-e) applicants for all projects within the TCSP area would be required to increase building energy efficiency 15% beyond Title 24 to achieve Tier 1 "green building" standards, install solar panels on flat roofs, integrate passive energy conservation design elements, and maximize natural ventilation in new building design. Implementation of these mitigation measures would ensure efficient use of energy resources and would not preempt future energy development or conservation efforts. Impacts would be less than significant.

Mitigation Measures. As discussed above, construction of new energy facilities is not anticipated and compliance with General Plan policies and project mitigation measures would not result in wasteful or inefficient use of energy resources, consistency with existing energy standards or preempt future energy development or conservation. Impacts would less than significant, and no mitigation is required.



Significance After Mitigation. Impacts would be less than significant without mitigation.

c. Cumulative Impacts.

Water. The analysis provided under Impact UTL-2 is cumulative in nature and considers the demand for water from existing and future development in the City. As described above, existing and planned sources of supply would be sufficient to accommodate projected citywide demand during normal and single-dry years. During multiple dry years, the City projected water resources would meet the projected water demands in most years through the year 2040. During years when deliveries of existing water supplies are below normal, the City anticipates implementing multiple strategies including but not limited to the following: 1) obtaining additional water resources via supplemental local ground water extractions, 2) additional purchases from local and regional suppliers, and 3) increasing water conservation and demand management measures. Further, existing water supplies are projected to be able to meet demand with the proposed project. Implementation of mitigation measures UTL-2(a) through (d) would reduce the contribution of the proposed project to this cumulative impact by ensuring supplies are available prior to approval of the individual phases of the TCSP and reducing the demand for potable water supplies from the proposed TCSP to the extent feasible. In addition, 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 discussion above, the contribution of the proposed project to this significant impact would not be cumulatively considerable.

Wastewater. Buildout of cumulative projects in the City will continue to increase demands on the OWTP. However, the plant currently has the capacity to accommodate up to 31.7 mgd (with 8.7 mgd of available capacity); treatment plant upgrades that would not generate additional capacity are currently in the planning process. The current capacity of the OWTP is sufficient to serve planned and pending development. City general fund monies and wastewater treatment connection fees provide revenue for the necessary replacement and improvements to the wastewater treatment plant. Therefore, cumulative impacts relating to the local wastewater system are considered less than significant.

Cumulative development would also increase the demand on the wastewater conveyance system. Individual projects would be required to mitigate wastewater collection system impacts on a case-by-case basis. Funding for increases in sewer capacity and other improvements come from a combination of connection fees paid by developers, service districts and general fund monies. The wastewater conveyance connection fee is required so that necessary expansions to the sewage collection system can accommodate new development in the City of Oxnard. Compliance with these requirements would reduce cumulative impacts to wastewater collection systems to a less than significant level.

Solid Waste. Planned and pending development in the City would continue to increase citywide solid waste generation. However, as discussed in the *Setting* and under Impact UTL-4, area landfills continue to have capacity to accommodate additional solid waste. The City currently diverts about 67% of the solid waste generated citywide. Because all new development in the City



would be required to participate in current and planned solid waste reduction programs, it is anticipated that the City will maintain, or even improve upon, this diversion rate. Thus, cumulative impacts to solid waste facilities would be less than significant.

Energy. Planned and pending development in the City would continue to increase citywide energy use. However, as discussed in the *Setting* and under Impact UTL-5, existing energy facilities continue to have capacity to serve additional energy demand. Because all residential electricity customers in the City were automatically enrolled in Clean Power Alliance and all future development project would be required to comply with General Plan policies related to green building standards, it is anticipated that the City will maintain, or increase efficiency in energy consumption. Thus, cumulative impacts to energy would be less than significant. Cumulative impacts have been addressed in the EIR prepared for the City's 2030 General Plan (November 2009), herein incorporated by reference. Cumulative development throughout Oxnard would incrementally contribute to energy resource impacts. However, the project would have less than significant impact with respect to wasteful or inefficient use of energy resources and would not obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the project would not contribute to a cumulative impact in this regard.



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5.0 GROWTH-INDUCING EFFECTS AND OTHER CEQA-REQUIRED DISCUSSIONS

This section addresses other topics required to be addressed under the *CEQA Guidelines* that are not covered in other parts of this EIR, including growth inducing effects and significant irreversible changes. Effects found not to be significant are addressed in Section 6.0 of this EIR.

5.1 GROWTH EFFECTS

Section 15126(d) of the *CEQA Guidelines* requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth effects are considered significant if they could result in significant physical effects in one or more environmental issue areas. The most commonly cited example of how an economic effect might create a physical change is where economic growth in one area could create blight conditions elsewhere by causing existing competitors to go out of business and the buildings to be left vacant.

5.1.1 Economic and Population Growth

As discussed in Section 2.0, *Project Description*, and Section 4.11, *Population, Education, and Housing* of this EIR, the TCSP would result in a net increase of 982 residential units (990 units proposed minus eight existing units to be demolished), up to 60,000 square feet of neighborhood serving commercial retail, mixed use, and office uses in a variety of single- and mixed-use structures, and a 132,000 square foot Business Research Park. Potential buildout of the additional parcels to be Annexed and rezoned south of Teal Club Road could result in up to approximately 347,608 square feet of light industrial development, of which half (173,804 square feet) is assumed to be manufacturing space and half is assumed to be warehouse space. Based on the City average of 3.89 persons per household, the proposed net addition of 982 residential units would generate an increase of approximately 3,909 residents. Based on the estimated 2019 citywide population of 206,352 residents, the addition of 3,909 residents would increase Oxnard's population by approximately 1.9% over the 10-year buildout. The net addition of 982 residential units would increase the current (2020) number of households in the City by approximately 1.7% over the 10-year buildout.

SCAG's 2001 Employee Density Study estimates one employee per 412 square feet of commercial retail space as an employee generation factor for Ventura County. Based on this factor, the proposed project would generate approximately 146 employees in the retail sector (60,000 sf of retail/mixed-use). The 2001 Employee Density Study also estimates one employee per 277 square feet of R&D/flex space; therefore, the proposed project would generate approximately 477 office workers (Business Research Park). The 2001 Employee Density Study also estimates one employee per 202 square feet of light manufacturing space and one employee per 149 square feet of warehouse space (SCAG, October 31, 2001). Based on these generation factors, the additional parcels to be Annexed south of Teal Club Road would generate up to



approximately 2,028 employees in the manufacturing sector (approximately 861 employees from the proposed manufacturing space and approximately 1,167 employees from the proposed warehouse space). Therefore, the proposed TCSP and the Annexation of the nine parcels south of Teal Club Road would generate an estimated total of approximately 2,651 employees.

Buildout under the proposed TCSP and Annexation of the nine additional parcels would generate temporary employment opportunities in industries such as construction. However, this would not be expected to draw a substantial number of new employees to the community, because it is anticipated that, given the extent and time frame of development, most construction jobs would be filled by the workforce already existing in the area at the time of construction.

As discussed in Section 4.11, *Population, Education, and Housing* of this EIR, the projected increase in housing, employment, and population as a result of the proposed project are within SCAG projections for Oxnard. In addition, development in the project area would be required to adhere to the goals and policies contained in the City of Oxnard 2030 General Plan. It is the specific purpose of the City of Oxnard 2030 General Plan to accommodate the orderly development of Oxnard, including the project area. Therefore, by its nature, the 2030 General Plan is intended to reduce the potential for uncontrolled growth and associated environmental impacts in Oxnard, including the project area. The TCSP area is pre-designated “Urban Village” in the City of Oxnard 2030 General Plan. As defined in 2030 General Plan Goal CD-7, Urban Villages are intended to support “development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.” The additional nine parcels proposed for Annexation south of Teal Club Road are designated for Airport Compatible land uses, as shown on the Oxnard 2030 General Plan land use map. Thus, the proposed uses and development have already been anticipated by the City and programmatically analyzed in the 2030 General Plan EIR.

5.1.2 Removal of Obstacles to Growth

As discussed above, approval of the proposed TCSP and Annexation of the additional nine parcels would accommodate increased development and population. The project area is surrounded on three sides by urban development, and these areas are served by full municipal services and utilities including roads, water, sewer, and other infrastructure that could be extended to the project area. The extension of infrastructure into the project area would not remove an obstacle to additional growth outside the project area. Therefore, the proposed project would not require or induce extension of utilities or other services into undeveloped areas in or around the project area that would induce growth beyond that associated with the proposed project. It should also be noted that undeveloped areas to the west of the project area are not within the City of Oxnard City Boundary and are outside of Oxnard’s City Urban Restriction Boundary (CURB) and Sphere of Influence. The proposed project would not have any significant effect from removing obstacles to growth outside of the project area.



5.2 IRREVERSIBLE ENVIRONMENTAL EFFECTS

The *CEQA Guidelines* require that EIRs evaluating projects involving amendments to public plans, ordinances, or policies contain a discussion of significant irreversible environmental changes. CEQA also requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. This section addresses nonrenewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed development.

Development of the proposed TCSP would convert approximately 149.5 acres of important farmland in the TCSP area to urban uses. Because this conversion would be unlikely to be reversed, it would represent an irreversible environmental effect of the project on Agricultural Resources, as discussed in Section 4.2 of this EIR. Mitigation Measure AG-1 would require the recordation of agricultural conservation easements to preserve important farmland at a 1:1 ratio with converted farmland. Implementation of this measure would mitigate the loss of important farmland to the extent feasible, by averting the future loss of important farmland on a regional scale. However, it would not undo the irreversible loss of important farmland from the TCSP area. The environmental effects of this conversion from a citywide perspective were studied in the City's 2030 General Plan EIR (City of Oxnard, November 2009). Chapter 8, *Other CEQA Considerations*, and Section 3.2, *Land Use*, of the General Plan EIR found that loss of existing agricultural land within the City's Planning Area is a significant, unavoidable adverse impact of the development envisioned under the 2030 General Plan.

Construction activity associated with the proposed TCSP and additional parcels to be Annexed would involve the use of building materials and energy, some of which are nonrenewable resources. Consumption of these resources would occur with any development in the region and are not unique to the project area. The addition of new residential and non-residential development in the project area would irreversibly increase local demand for nonrenewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies included in the TCSP and the City of Oxnard 2030 General Plan, are expected to offset this demand to some degree. As discussed below, it is not anticipated that the development envisioned by the proposed TCSP would significantly affect local or regional energy supplies.

Growth associated with the proposed project would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in Sections 4.12 and 4.14 of this EIR, impacts related to public services and utilities would be less than significant with incorporated mitigation.

The additional vehicle trips associated with the proposed project would incrementally increase local traffic, noise levels and regional air pollutant emissions. As discussed in Section 4.3, *Air Quality*, certain emissions associated with project implementation would exceed applicable significance thresholds even with incorporated mitigation, resulting in a significant and unavoidable impact.

As discussed in Section 4.10, *Noise*, of this EIR, increased noise levels from traffic noise associated with the project would not expose sensitive receptors to noise levels exceeding



applicable standards, and this impact would be less than significant. Other operational noise impacts would be less than significant with mitigation. Construction noise impacts, because they would occur during the daytime and would be temporary, would be less than significant with mitigation incorporated.

Finally, as discussed in Section 4.13, *Transportation and Traffic*, of this EIR, the project would require modifications to surrounding roads and intersections and would extend new roads into and within the project area. These modifications are unlikely to reverse.



6.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the California Environmental Quality Act (CEQA) *Guidelines* requires an EIR to briefly describe any possible significant effects that were determined not to be significant and were, therefore, not discussed in detail in the EIR. This section addresses the potential environmental effects of the proposed project that have been found not to be significant. The items listed below that were found not to be significant are contained in the environmental checklist form included the City of Oxnard's 2017 *CEQA Guidelines*. Any items not addressed in this section were addressed in Section 4.0, *Environmental Impact Analysis*, of this EIR. Section 4.0 also includes an expanded discussion of the settings under each environmental factor listed.

6.1 AESTHETICS

Effects were found to be potentially significant as discussed in Section 4.1 of the EIR.

6.2 AGRICULTURAL RESOURCES

Effects were found to be potentially significant as discussed in Section 4.2 of the EIR.

6.3 AIR QUALITY

Effects were found to be potentially significant as discussed in Section 4.3 of the EIR.

6.4 BIOLOGICAL RESOURCES

Setting. Setting information is provided in Section 4.4.1

Checklist Questions.

Would the project:

- 1) *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service*
- 2) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service*
- 3) *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means*
- 4) *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*
- 5) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance*



- 6) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan*

Answers to Checklist Questions.

Checklist items (1), (3) and (4) are discussed in Section 4.4 of the EIR.

2) The project area is currently in agricultural production and contains row crops, farm houses, and associated structures. According to the California Natural Diversity Database (CNDDB), and a field reconnaissance survey completed by Rincon Consultants in July 2019, the project area does not contain any riparian habitat or other sensitive natural community. Therefore, no impact would occur in this regard.

5-6) The project area is not within the boundaries of an existing Habitat Conservation Plan, Natural Community Conservation Plan or other approved habitat conservation plan. Numerous trees would be removed from the project area. The City of Oxnard policy requiring the replacement of trees for the removal of “certain significant trees” is addressed in the Land Use and Aesthetics Sections. **No impact** would occur.

Cumulative Impacts. Cumulative impacts have been addressed in the EIR prepared for the City’s 2030 General Plan (November 2009), herein incorporated by reference. Potential cumulative impacts to biological resources associated with this project are discussed in Section 4.4, *Biological Resources*, for impacts (1), (3), and (4). Because the project would have no impact for impacts (2), (5), and (6), it would make no contribution towards cumulative impacts in these areas.

Conclusions. No impacts related to riparian habitat, sensitive natural communities, or conflicts with an approved habitat conservation plan would occur. These topics do not require further study in the EIR. Impacts to protected species, migratory corridors, and wetlands are discussed in detail in Section 4.4 of the EIR.

6.5 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

Setting. There are no officially designated historical resources in or adjacent to the project area (Post/Hazeltine Associates, August 2007). A structure may be considered historically significant and eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR) if it meets any of the following criteria:

- 1) Is associated with events that have made a significant contribution to the broad patterns of history and cultural heritage;
- 2) Is associated with the lives of persons important in our past;
- 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- 4) Has yielded, or may be likely to yield, information important in prehistory or history.



For a structure, building, or property to be eligible for listing on the NRHP, it must be at least 50 years of age or older and retain its visual and physical integrity.

Checklist Questions.

Would the project:

- 1) Cause a substantial adverse change in the significance of an historical resource as defined in State CEQA Guidelines Section §15064.5?
- 2) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to State CEQA Guidelines Section §15064.5?
- 3) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- 4) Disturb any human remains, including those interred outside of formal cemeteries?

Answers to Checklist Questions.

1) The single family residence in the central-southern portion of the site along Teal Club Road was constructed in the early to mid-1960s and the single family residence in the northeastern corner (Borchard residence) was constructed in 1938. However, these farmhouses are not considered historic resources as they do not meet any of the criteria described above. The farmhouses are not associated with significant events or persons. The farmhouses are typical and do not embody the distinctive characteristics of a type, period, region or method nor do they have artistic value. Further, the farmhouses have not yielded and are not likely to yield important information. No impact to historic resources would occur (Post/Hazeltine Associates, August 2007).

2-4) Because of the conversion from agricultural to urbanized uses proposed under the project, extensive ground disturbance would occur. However, extensive ground disturbance that has occurred on the project area during past development and agricultural activities, as well as the lack of natural surface water features, reduces the likelihood that intact prehistoric cultural or tribal cultural resources are present, and the possibility of encountering previously undisturbed cultural resources during project construction would be remote. **This would be a less than significant impact; however, mitigation measures CR-1(a) through CR-1(c) are recommended in order to minimize impacts to cultural resources.** This is a standard measure that is used when there is a possibility of encountering cultural resources during project construction.

Recommended Mitigation:

The following measures are recommended in order to further reduce cultural resource impacts:

- CR-1(a) Native American Monitoring.** Developer shall contract with a Native American monitor to be present during all subsurface grading, trenching or construction activities on the project area. The monitor shall provide a monthly report to the Planning Division summarizing their activities during the reporting period. Monitoring may be reduced or halted at the discretion of the monitors as warranted by conditions such as encountering bedrock, sediments being excavated are fill, soils occur within formations unlikely to yield cultural resources (e.g., soils



formations predating human occupation of the region), or negative findings during the first 30 percent of rough grading. If monitoring is reduced to spot-checking, spot-checking shall occur when ground-disturbance moves to a new location in the project site and when ground disturbance will extend to depths not previously reached (unless those depths are within bedrock). A copy of the contract for these services shall be submitted to the Planning Manager for review and approval prior to grading activities on site. The monitoring report(s) shall be provided to the Planning Division prior to approval of final building permits.

- CR-1(b) Procedures for Discovery of Intact Cultural Resources.** In the event that archaeological resources are unearthed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (NPS 1983) has evaluated the nature and significance of the find. If necessary, the evaluation may require preparation of a treatment plan and testing for the California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work, such as data recovery excavation, may be required to mitigate any significant impacts to historical resources. After the find has been appropriately mitigated, work in the area may resume. A Chumash representative shall monitor any mitigation work associated with Native American cultural material.
- CR-1(c) Procedures for Discovery of Human Remains.** If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the California Native American Heritage Commission.
- CR-1(d) Unanticipated Discovery of Tribal Cultural Resources.** In the event that cultural resources of Native American origin are identified during construction, all earth-disturbing work within the vicinity of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in



consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archeologist and the appropriate Native American tribal representative.

Cumulative Impacts. Cumulative cultural resources impacts have been addressed in the City's 2030 General Plan Program EIR (certified 2011), herein incorporated by reference. The 2030 General Plan EIR determined that impacts to historic resources from implementation of the 2030 General Plan would be less than significant. The 2030 General Plan EIR also states that the preservation of cultural resources is a key goal of the 2030 General Plan, in particular the Community Development and Environmental Chapters. The Community Development Chapter contains a number of policies designed to protect the historic qualities of the City's unique historic and traditional neighborhoods as new development is proposed in the Planning Area. For example, Policy CD-9.1, "Neighborhood Identity", requires that infill development respect historic structures and be of comparable scale/character with existing historic areas. Policies within the proposed Environmental Resources Chapter establish protocols (see policies ER-12.1 "Archaeological Resource Surveys" and ER-12.6 "Identification of Archaeological Resources") to address archaeological resources including pre-project activities (i.e., resource surveys, records searches) and resource discovery measures (i.e., data recovery and analysis). The Environmental Resources chapter also contains Policy ER-12.3 "Development Applicant" that requires development applicants to conduct a records search at the South Central Coast Information Center located at California State University Fullerton. Policy ER-12.7 "Native American Remains" also requires compliance with CEQA guidelines if human remains of possible Native American origin are discovered during project construction.

Cumulative development throughout the Oxnard area would incrementally contribute to cultural resource impacts. However, the project's contribution to cumulative cultural resource impacts would not be considerable because the site is already developed, no cultural resources have been identified within the project area, and potential impacts would be further reduced through the implementation of the 2030 General Plan policies listed above and the recommended mitigation measures listed herein that address standard discovery provisions.

Conclusions. Impacts to cultural resources would be less than significant. Recommended mitigation measures CR-1(a) through CR-1(d) are included in the *Executive Summary* in Table ES-1 (which lists identified impacts and mitigation measures) as a *recommended* mitigation measure.

6.6 GEOLOGY/SOILS

Setting. Setting information is provided in Section 4.5.1.

Checklist Questions.

Would the project:

- 1) *Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*



- a. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Map issued by the State Geologist or based on other substantial evidence of a known fault.;*
- b. *Strong seismic groundshaking that cannot be addressed through compliance with standard Code requirements*
- 2) *Location of development on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse that cannot be addressed through compliance with standard Code requirements; or*
- 3) *Location of development on expansive soil, creating substantial risks to life or property that cannot be addressed through compliance with standard Code requirements.*
- 4) *Expose people or structures to inundation by seiche or tsunami*
- 5) *Rely on dredging or other maintenance activity by another agency that is not guaranteed to continue*

Answers to Checklist Questions.

All of the checklist questions except items (4) and (5) are discussed in Section 4.5 of the EIR.

4) Seiches are oscillations of the surface of an inland body of water that varies in period from a few minutes to several hours. Seismic excitations can induce such oscillations. Since the project area is not located close to an inland body of water, there is no risk of inundation by seiche. Commonly called “tidal waves,” tsunamis are seismic sea waves caused by submarine landslides, volcanic disturbances or offshore earthquakes. The State of California Department of Conservation Tsunami Inundation Map for the Oxnard Quadrangle (February 15, 2009) indicates that the project area is not within an area considered to be vulnerable to tsunamis. No impact would occur.

5) The project would not involve dredging or other maintenance activity by another agency that is not guaranteed to continue. No impact would occur.

Cumulative Impacts. Cumulative impacts have been addressed in the EIR prepared for the City’s 2030 General Plan (November 2009), herein incorporated by reference. Cumulative development throughout Oxnard would incrementally contribute to geologic resource impacts. However, the project would have no impact with respect to seiche, tsunami, dredging, or maintenance by another agency; therefore, it would not contribute to a cumulative impact in this regard. Cumulative impacts related to seismic hazards, erosion, water quality impacts, or unstable soils are discussed in Section 4.5 of this EIR.

Conclusions. The project would not result in impacts related to seiche, tsunami, dredging, or maintenance by another agency, and these impacts require no further study in the EIR. Impacts related to seismic hazards, erosion, water quality impacts, expansion, and unstable soils are discussed in Section 4.5 of this EIR.

6.7 GREENHOUSE GAS EMISSIONS/CLIMATE CHANGE

Effects were found to be potentially significant as discussed in Section 4.6 of the EIR.



6.8 HAZARDS AND HAZARDOUS MATERIALS

Setting. Setting information is provided in Section 4.7.1.

Checklist Questions.

Would the project:

- 1) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials that cannot be addressed through compliance with standard regulatory requirements?*
- 2) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*
- 3) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school, in quantities or a manner that would create a substantial hazard?*
- 4) *Be located on a site which is included on a list of hazardous material 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?*
- 5) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Answers to Checklist Questions.

All of the checklist questions except item (5) are discussed in Section 4.7 of the EIR.

5) The City of Oxnard General Plan Policy ICS-20.10 requires that new development provide access for emergency vehicles and evacuation routes, as appropriate. All development in the TCSP area and the additional annexation area, including new roads and driveways, would be required to meet City, County, and California Fire Code regulations for emergency access. No existing roads would be narrowed, closed or otherwise modified to reduce access. The project would not impair or interfere with an emergency response or evacuation plan. **No impacts would occur.**

Cumulative Impacts. Cumulative impacts have been addressed in the EIR prepared for the City's 2030 General Plan (November 2009, certified October 2011), herein incorporated by reference. Potential cumulative impacts related to hazards and hazardous materials associated with this project are discussed in Section 4.7, *Hazards and Hazardous Materials*, for impacts (1) through (4). Because the project would have no impact for impact (5), it would make no contribution towards cumulative impacts in this area.

Conclusions. The project would not expose persons to significant impact with respect to an adopted emergency response or evacuation plan and this impact require no further study in the EIR. Impacts related to all other hazards are discussed in Section 4.7 of this EIR.



6.9 HYDROLOGY AND WATER QUALITY

Setting. The project area is within shaded Zone X, which indicates a moderate risk of flooding, typically between the limits of the 100-year and 500-year floods. Additional setting information is provided in Section 4.8.1.

Checklist Questions

Would the project:

1. *Cause a violation of any adopted water quality standards or waste discharge requirements?*
2. *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?*
3. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
4. *Place new structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*
5. *Impede or redirect flood flows such that it would increase on- or off-site flood potential?*
6. *Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?*
7. *Inundation by seiche, tsunami, or mudflow?*

Answers to Checklist Questions.

Checklist items (1), (2), and (3) are discussed in Section 4.8 of the EIR.

4-6) The project area is in shaded Zone X, which indicates a moderate risk of flooding, typically between the limits of the 100-year and 500-year floods. This zone is also used to “designate base floodplains of lesser hazards, such as areas protected by levees from 100-year flood, or shallow flooding areas with average depths of less than one foot or drainage areas less than 1 square mile” (FEMA, 2012). Because the project area is outside the 100-year flood zone, buildings and residents onsite would not be placed within a flood hazard area. Additionally, the project would not involve placing structures that would impede or redirect flood flows within a 100-year flood hazard area. Implementation of the proposed TCSP and buildout of the nine parcels to be annexed and rezoned for manufacturing uses would not create new areas of flooding. **No impact would occur.**

7) Seiches are oscillations of the surface of an inland body of water that varies in period from a few minutes to several hours. Seismic excitations can induce such oscillations. Since the project area is not located close to an inland body of water, there is no risk of inundation by seiche.

Commonly called “tidal waves,” tsunamis are seismic sea waves caused by submarine landslides, volcanic disturbances or offshore earthquakes. The State of California Department of Conservation Tsunami Inundation Map for the Oxnard Quadrangle (February 15, 2009) indicates that the project area is not within an area considered to be vulnerable to tsunamis.



Additionally, mudflow potential would not pose a hazard to the project area as the project area is located on a flat portion of the City and is not adjacent to any mountains or hills. **No impact would occur.**

Cumulative Impacts. Cumulative impacts have been addressed in the EIR prepared for the City's 2030 General Plan (November 2009), herein incorporated by reference. Potential cumulative impacts related to hydrology and water quality associated with this project are discussed in Section 4.8, *Hydrology and Water Quality*, for impacts (a) through (c). Because the project would have no impact for impacts (4) through (7), it would make no contribution towards cumulative impacts in these areas.

Conclusions. The project would not expose persons to significant impact with respect to flooding or inundation by seiche, tsunami, or mudflow and these impacts require no further study in the EIR. Impacts related to all other hydrology and water quality impacts are discussed in Section 4.8 of this EIR.

6.10 LAND USE AND PLANNING

Setting. Setting information for land use is provided in Section 4.9.1.

Checklist Questions

Would the project:

- 1) *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 an environmental effect;*
- 2) *Involve land uses that are not allowed under an applicable airport land use compatibility plan;*
- 3) *Conflict with an applicable habitat conservation plan or natural community conservation plan; or,*
- 4) *Physically divide an established community.*

Answers to Checklist Questions.

All of the checklist items except item (3) are discussed in Section 4.9 of the EIR.

3) The site is not protected by a habitat conservation plan, natural community conservation plan, or other adopted conservation plan. **No impact** would occur.

Cumulative Impacts. Cumulative impacts have been addressed in the EIR prepared for the City's 2030 General Plan (November 2009), herein incorporated by reference. Potential cumulative impacts to land use and planning associated with this project are discussed in Section 4.9, *Land Use and Planning*, for impacts (1), (2), and (4). Because the project would have no impact for impacts (3) it would make no contribution towards cumulative impacts in this area.



Conclusions. No impacts related to an approved habitat conservation plan or natural community conservation plan would occur. This topic does not require further study in the EIR.

6.11 MINERAL RESOURCES

Setting. The project area is located in Ventura County, just outside the western boundary of the City of Oxnard. According to the City's 2030 General Plan, important mineral / sand / gravel deposits are primarily located along the Santa Clara River channel, along Route 101 (Ventura Freeway) corridor and along the eastern edge of the City extending as far west as Oxnard Boulevard in several areas.

Checklist Questions.

Would the project:

- 1) *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?*
- 2) *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?*

Answers to Checklist Questions.

1, 2) The proposed project involves annexation of the project area into the City of Oxnard, development of the proposed TCSP on currently agricultural land, and potential future development of the 11.4 acres south of Teal Club Road. These actions would lead to increased development in the project area. However, the project area is not designated as a significant mineral resources zone (City of Oxnard 2030 General Plan PEIR, November 2009), and mineral resource extraction in this area would be generally incompatible with existing surrounding residential uses. **As such, no mineral resource impacts would occur.**

Cumulative Impacts. Cumulative impacts have been addressed in the EIR prepared for the City's 2030 General Plan (November 2009), herein incorporated by reference. There are no mineral resource impacts associated with this project.

Conclusions. No impacts to mineral resources would occur as a result of the proposed project. This topic does not require further study in the EIR.

6.12 NOISE

Effects were found to be potentially significant as discussed in Section 4.10 of the EIR.

6.13 POPULATION AND HOUSING

Effects were found to be potentially significant as discussed in Section 4.11 of the EIR.

6.14 PUBLIC SERVICES

Effects were found to be potentially significant as discussed in Section 4.12 of the EIR.



6.15 RECREATION

Effects were found to be potentially significant as discussed in Section 4.12 of the EIR.

6.16 TRANSPORTATION/TRAFFIC

Setting. Setting information is provided in Section 4.13.1.

Checklist Questions.

Would the project:

- 1) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections) based on adopted City of Oxnard level of service (LOS) standards?
- 2) Exceed, either individually or cumulatively, an LOS standard established by Ventura County Congestion Management Program (CMP) for designated roads or highways?
- 3) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- 4) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- 5) Result in inadequate emergency access;
- 6) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Answers to Checklist Questions.

All of the checklist questions except item (3) are discussed in Section 4.13 of the EIR.

3) The project area is located in proximity to Oxnard Airport. However, neither the proposed TCSP uses and development nor the potential uses and development in the parcels to be annexed south of Teal Club Road would result in a change in air traffic patterns or increase in air traffic levels. (Safety risks related to the change of land uses and development in proximity to the airport are discussed in Section 4.7, *Hazards and Hazardous Materials*.) The project would also not require any modification of flight paths for the Oxnard Airport. Therefore, **no impact** would occur.

Cumulative Impacts. Cumulative impacts have been addressed in the EIR prepared for the City's 2030 General Plan (November 2009), herein incorporated by reference. Potential cumulative impacts related to traffic associated with this project are discussed in Section 4.13, *Transportation and Traffic*, for impacts (1), (2), (4), (5), and (6). Because the project would have no impact for impact (3), it would make no contribution towards cumulative impacts in this area.

Conclusions. The project would not result in a change in air traffic patterns or levels that results in a substantial safety risk and this impact requires no further study in the EIR. Impacts related to all other traffic impacts are discussed in Section 4.13 of this EIR.



6.17 UTILITIES AND ENERGY

Effects were found to be potentially significant as discussed in Section 4.14 of the EIR.

6.18 WILDFIRE

Checklist Questions.

Would the project:

- 1) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- 2) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- 3) Require installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- 4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Answers to Checklist Questions.

Checklist question (1) is discussed in Subsection 6.8, Hazards and Hazardous Materials, above.

2) The TCSP area and the additional annexation area are not located within wildfire hazard areas as identified in the Ventura County General Plan Appendix (2011). Surrounding land uses consist of the airport, residential neighborhoods and irrigated cropland. The project area is flat and does not contain slopes or other features which would exacerbate wildfire risks. Therefore, the project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. **No impact** would occur.

3) The proposed project would include development of new roads, power lines and other utilities to serve the new residential, commercial and park land uses in the TCSP area. As noted in Section 4.12, Public Services, all development under the proposed project including construction of new roads and driveways would comply with the City of Oxnard Fire Code. Therefore, installation and maintenance of associated infrastructure under the proposed project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. **No impact** would occur.

4) The project area is generally flat and surrounded by generally flat areas. The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. **No impact** would occur.



Cumulative Impacts. Cumulative impacts have been addressed in the EIR prepared for the City's 2030 General Plan (November 2009), herein incorporated by reference. Cumulative development throughout Oxnard would incrementally contribute to wildfire impacts. However, the project would have no impact with respect to impairing an adopted emergency response or evacuation plan, exacerbating wildfire risks, or requiring installation or maintenance of infrastructure which could exacerbate fire risk. Therefore, the project would not contribute to a cumulative impact in this regard.

Conclusions. No impacts related to wildfire would occur as a result of the proposed project. Therefore, the project would not contribute to a significant cumulative impact. This topic does not require further study in the EIR.

6.19 MANDATORY FINDINGS OF SIGNIFICANCE

Checklist Questions.

- 1) *Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*
- 2) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*
- 3) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Answers to Checklist Questions.

a) Based on the analysis contained in this document, the project would have significant but mitigable impacts on nesting birds, the California horned lark (a locally sensitive animal), monarch butterfly aggregations, and potential jurisdictional waters (including wetlands and riparian habitat). For this reason, the project would have the potential to reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, but these impacts would be **less than significant with incorporated mitigation** contained in Section 4.3, *Biological Resources* of this EIR.

There are no officially designated historical resources on or adjacent to the project area. Because of the conversion from agricultural to urbanized uses proposed under the project, extensive ground disturbance would occur. However, extensive ground disturbance that has occurred on the project area during past development and agricultural activities, as well as the lack of natural surface water features, reduces the likelihood that intact prehistoric cultural resources are present, and the possibility of encountering previously undisturbed cultural resources during project construction would be remote. **This would be a less than significant impact; however, mitigation measures CR-1(a) through CR-1(c) are recommended in order to minimize impacts to cultural resources.** This is a standard measure that is used when there is a possibility of encountering cultural resources during project construction.



b) Cumulative impacts have been addressed in the EIR prepared for the City's 2030 General Plan (November 2009, certified October 2011), herein incorporated by reference. In addition, cumulative impacts are examined for each issue area above. As discussed, cumulative impacts related to Aesthetics, Air Quality, Geology/Soils, Greenhouse Gas Emissions, Hazards/Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Population/Housing, Transportation/Traffic, Public Services, and Utilities/Service Systems are **potentially significant and have been addressed in Sections 4.0 and 5.0 of the EIR.**

c) As presented in this document, the project has the potential to degrade the quality of the environment that could substantially affect human beings in several issue areas including Aesthetics, Air Quality, Geology/Soils, Greenhouse Gas Emissions, Hazards/Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Population/Housing, Transportation/Traffic, Public Services, and Utilities/Service Systems. **These impacts are potentially significant and have been addressed in Sections 4.0 and 5.0 of the EIR.**



7.0 ALTERNATIVES

As required by Section 15126(d) of the State CEQA Guidelines, this EIR examines a range of reasonable alternatives to the proposed project that could feasibly achieve similar objectives. The discussion focuses on alternatives that may be able to reduce one or more of the adverse impacts associated with the proposed project. Included in this analysis are the CEQA-required “no project” alternative and two additional alternatives. These are listed and summarized below, and subsequently discussed in greater detail within the impact analysis for each alternative:

- *Alternative 1: No Project – No Development*
- *Alternative 2: Phase 1 Development Only*
- *Alternative 3: Reduced Intensity*

This section also identifies the Environmentally Superior Alternative in accordance with CEQA. Table 7-1 provides a summary comparison of the development characteristics of the proposed project and the alternatives. A more detailed description of the alternatives is included in the impact analysis for each alternative.

**Table 7-1
 Comparison of Proposed Project Alternatives Buildout Characteristics**

Characteristic	Alternatives			
	Proposed Project	Alternative 1: No Project – No Development	Alternative 2: Phase 1 Development Only	Alternative 3: Reduced Intensity
TCSP Area				
Residential Buildout (dwelling units)	990	0	718	990
Non-Residential Buildout (square feet)	192,000	0	60,000	50,000
Parks and Open Space (acres)	12.3	0	6.88	17.76
Additional Annexation Area				
Manufacturing (square feet)	173,804	0	173,804	173,804
Warehouse (square feet)	173,804	0	173,804	173,804

As listed in Section 2.0 *Project Description*, the project objectives for the proposed project are:

Project Proponent:

- 1) *Create an integrated land, transportation, and infrastructure plan that allows for a mix of residential, mixed-use, and commercial development to minimize the need for short distance single-person vehicle trips both within the project and within the City.*
- 2) *Provide a balance and economic match, to the extent feasible, between on-site housing and employment opportunities.*
- 3) *Create an integrated vehicular, pedestrian and bicycle circulation system that connects residential, industrial, and commercial uses within the project.*
- 4) *Create recreational opportunities accessible to the neighborhood and City of Oxnard.*



- 5) *Establish land uses that permit a range of housing opportunities with varying densities, types, styles, prices and tenancy characteristics including compliance with the 2030 General Plan Housing Element affordability requirements.*
- 6) *Adopt design guidelines and regulations to provide for consistent and orderly implementation of the plan.*
- 7) *Provide development and transitional land use patterns that do not conflict with surrounding land uses and neighborhoods.*
- 8) *Avoid leapfrog development and accommodate projected growth in a location adjacent to existing infrastructure, urban services, existing circulation elements and community facilities.*
- 9) *Minimize traffic trips by providing a variety of neighborhood services in the commercial area of the project.*
- 10) *Establish development regulations to ensure residential neighborhoods are compatible with the surrounding area and all proposed land uses are properly integrated or buffered, as appropriate.*
- 11) *Access the City's Advanced Water Purification program for non-potable water uses.*
- 12) *Provide an adequate buffer between the TCSP area and agricultural uses to the west on both an interim and permanent basis, as needed.*
- 13) *Utilize commercial land uses to buffer the TCSP area from the Oxnard Airport to the south.*
- 14) *Provide bike and trail linkages between the TCSP area and existing facilities.*
- 15) *Provide a mix of land uses that are financially independent, sustainable, and not a fiscal burden on the General Fund of the City of Oxnard.*
- 16) *Ensure appropriate phasing and financing for community facilities including street and road improvements, water, urban runoff and flood control facilities, and parks.*
- 17) *Create neighborhoods with lasting value by setting high quality standards for residential and commercial land development and related public improvements.*
- 18) *Comply with the State of California's "Build it Green" standards.*

City of Oxnard:

- 1) *Develop a project consistent with the 2030 General Plan and other adopted and relevant City policies and capital improvement plans and programs.*
- 2) *Incorporate innovative, feasible, flexible features that assist the City in implementing relevant 2030 General Plan and related environmental, economic development, and planning goals, policies, and programs.*

7.1 NO PROJECT - NO DEVELOPMENT

This alternative assumes that the proposed project is not approved and that the project area is not developed. For the TCSP area, the existing County of Ventura Zoning of Agricultural Exclusive-40 and County of Ventura General Plan designation of Agricultural would remain and the area would remain in active agricultural uses. The existing structures on-site would not be demolished. The nine parcels in the additional Annexation area would not be Annexed and would remain designated as Agricultural-Urban Reserve in the Ventura County General Plan.

7.1.1 Impact Analysis

The No Project - No Development alternative would involve no changes to the physical environment and thus would have no environmental effects. As such, this alternative would



have no impact with respect to aesthetics, agricultural resources, biological resources, geology, greenhouse gas (GHG) emissions/climate change, hazards and hazardous materials, hydrology, noise, population, education, and housing, public services and recreation, traffic, or utilities and energy. This alternative would be inherently consistent with the Ventura County General Plan, but would conflict with the City of Oxnard General Plan, which pre-designates the project area as “Urban Village” and includes a goal to support development of this land. This alternative would not require Annexation of any properties into the City of Oxnard.

Construction impacts associated with the proposed project would be avoided because no development would occur in the project area. This alternative would eliminate the proposed project’s significant and unavoidable impacts with respect to conversion of important farmland, operational air pollution emissions, and change in visual character. No mitigation measures would be required for the No Project – No Development alternative. Overall impacts would be lower than those of the proposed project since no change to environmental conditions would occur.

The No Project – No Development Alternative would not meet several of the objectives of the proposed project, including:

- *Provide a mix of residential and commercial development to minimize vehicle trips (Objective 1)*
- *Create recreational opportunities (Objective 4)*
- *Create housing opportunities (Objective 5)*

7.2 ALTERNATIVE 2: PHASE 1 DEVELOPMENT ONLY

This alternative anticipates that Phase 2 of the TCSP would not be developed. The 57.9 acres that comprise Phase 2 would continue to be used for agriculture. The 91.8 acres of the Phase 1 planning area would be developed, 150-foot agricultural buffers (with a vegetative screen) would be provided and the Phase 2 area would be removed from the TCSP (see Figure 7-1). The resulting project (Phase 1 only) would include 723 dwelling units at various densities, a 6.5-acre Community Park, and Urban Village core along Ventura Road. Total non-residential development in the TCSP area would include 60,000 square feet of commercial/mixed-use space. Development of the business research park would not occur. The additional nine parcels south of Teal Club Road would still be annexed and zoned for light manufacturing, potentially facilitating up to 347,608 square feet of light industrial development. Table 7-2 compares the characteristics of Alternative 2 to the proposed project.



**Table 7-2
Comparison of Proposed Project to Alternative 2**

Land Use	Proposed Project			Alternative 2: Phase 1 Development Only		
	Acres	Dwelling Units	Building Square Footage	Acres	Dwelling Units	Building Square Footage
Residential						
PA-1 Detached Residential	17.52	140	-	17.52	140	-
PA-2 Detached Residential	10.01	80	-	10.01	80	-
Subtotal Single-Family Detached	27.53	220	-	27.53	220	-
PA-3 Attached Residential	9.60	145	-	9.6	145	-
PA-4 Attached Residential	5.54	88	-	5.54	88	-
PA-5 Attached Residential	10.57	240	-	10.57	240	-
PA-11 Attached Residential	15.64	167	-	0	0	-
Commercial/Mixed Use (Residential)	0.0	30	-	0	30	-
PA-12 Attached Residential/Apartments	4.43	100	-	0	0	-
Subtotal Multi-Family	45.78	770	-	25.71	503	-
Total	73.31	990	-	53.24	723	-
Non-residential						
PA-8 Community Park	6.50	0	-	6.5	0	-
PA-9 Community Park	3.50	0	-	0	0	-
Beverly Dr. Greenbelt	0.38	0	-	0.38	0	-
Parks & Open Space Subtotal	17.76	0	-	6.88	0	-
PA-6 Commercial/Mixed Use	4.35	0	10,000	4.35	0	10,000
PA-7 Urban Village Commercial	4.43	0	50,000	4.43	0	50,000
Commercial/Mixed Use Subtotal	8.78	0	60,000	8.78	0	60,000
PA-13 Business Research Park	6.19	0	88,000	0	0	0
PA-14 Business Research Park	2.92	0	44,000	0	0	0
Light Industrial Subtotal	9.11	0	132,000	0	0	0
Ventura Road	2.82	0	-	2.82	0	-
Doris Avenue	2.80	0	-	2.8	0	-
Patterson Road	0.30	0	-	0	0	-
Teal Club Road	7.20	0	-	2.9	0	-
Arterial Roadways Subtotal	13.12	0	-	8.52	0	-
Interior Roadways	22.18	0	-	12.42	0	-
Detention Basins	5.46	0	-	2.37	0	-
Interior Roadways & Misc. Subtotal	27.64	0	-	14.79	0	-
Total TCSP area	149.72	990	192,000	91.83	723	60,000
Total additional annexation area	11.4	-	347,608	11.4	-	347,608



Figure 7-1 Alternative 2, Phase I Development Only



Source: TEAL CLUB SPECIFIC PLAN



Overall, this alternative would result in 267 fewer residential units than the proposed project (a 27% reduction) and 132,000 fewer square feet of non-residential development (a 29% reduction). This alternative would result in the demolition of one existing single-family residence in the TCSP area and approximately six residences in the additional Annexation area.

7.2.1 Aesthetics

This alternative would reduce overall development compared to the proposed project as the 57.9-acre TCSP Phase 2 development area would not be developed. Nonetheless, TCSP Phase 1 development would be visible from viewpoints along several public roadways, including Ventura Road, Patterson Road, Doris Avenue, Victoria Avenue, and Fifth Street, which are identified in the Oxnard General Plan as routes within the City's Scenic Highway System. However, similar to the proposed project, given the limited extent to which the project would affect scenic vistas, and the fact that views of the elements of these vistas, such as distant mountains and nearby agricultural lands, are readily available from nearby areas, impacts would be Class III, *less than significant*.

Like the proposed project, this alternative would replace scenic resources such as farmland and tree windrows which define the project area's visual character. However, as this alternative would reduce development by 57.9 acres, it would remove less farmland and fewer tree windrows than the proposed project. Therefore, impacts would be reduced. Nonetheless, with development of the 91.8-acre TCSP Phase 1 development area and development of the additional Annexation area, the visual character and quality of the site would be substantially altered. Impacts would remain Class II, *significant but mitigable* and Mitigation Measure AES-2 would continue to apply.

This introduction of light and glare to the project area would be reduced under this alternative as the amount of development would be reduced. Impacts related to light and glare would therefore be reduced under this alternative compared to the proposed project, and would continue to be Class III, *less than significant*.

7.2.2 Agricultural Resources

This alternative would reduce the amount of converted farmland compared to the proposed project by 57.9 acres. Nonetheless, this alternative would convert approximately 92 acres of "important farmland" to non-agricultural uses, resulting in a similar Class I, *significant and unavoidable*, permanent loss of agricultural lands. As with the proposed project, Mitigation Measure AG-1 would require the applicant to record permanent agricultural conservation easements in order to help avert the future regional conservation of agricultural lands to the extent feasible. However, the impact to important farmland would remain significant and unavoidable due to the permanent, irreversible loss of important farmland within the TCSP area.

With this alternative, the Phase 2 area would remain in agricultural production. As shown in Figure 7-1, this would place residential uses immediately east and north of the agricultural uses. Therefore, this alternative would create potential land use conflicts between urban and agricultural uses. Impacts to residents may result from agricultural chemicals, dust, odors associated with pesticides and livestock, and farming equipment noise. However, as shown in



Figure 7-1, this alternative would involve 150-foot agricultural setbacks where development would not occur. In addition, this alternative would involve a vegetative screen between development and agricultural uses. With the 150-foot setback and vegetative screen, this alternative would be in compliance with the Ventura County Agricultural/Urban Buffer Policy. The policy is designed to prevent impacts related to agricultural and urban land use conflicts. Therefore, impacts related to agricultural compatibility would be Class III, *less than significant*. Mitigation Measure AG-2 regarding interim agricultural buffers would not be needed as this alternative would provide appropriate buffers.

7.2.3 Air Quality

A project is consistent with the 2007 AQMP if its direct and indirect emissions are accounted for in the growth assumptions of the AQMP (or the most recent VCOG population projections) and the project is consistent with the policies in the AQMP. As noted in Section 4.3, *Air Quality*, the proposed project would be consistent with the AQMP because, compared to the expected population increase in Oxnard by 2030 and 2035, it would not generate population growth exceeding the most recent VCOG or General Plan projections. The Phase 1 Development Only Alternative would generate 716 net new housing units (723 minus one existing residence in the TCSP area and six residences in the additional Annexation area that would be demolished). Based on an average of 3.89 people/dwelling unit (Department of Finance [DOF] 2020), this alternative would add an estimated 2,786 new residents to the City of Oxnard (716 net new residences x 3.89 = 2,786). This is a 28% reduction when compared to the proposed project and would also be within the VCOG growth projections. As with the proposed project, impacts would be Class III, *less than significant*.

The Phase 1 Development Only Alternative would allow the development of up to 723 residential units and 407,608square feet of non-residential space. This is a 28% reduction in residential buildout and a 24% reduction in non-residential buildout. Temporary impacts to air quality resulting from construction of this alternative would therefore be reduced compared to the proposed project. However, new development would still generate temporary increases in localized air pollutant emissions. Therefore, impacts would remain Class II, *significant but mitigable*, similar to the proposed project, and mitigation measures AQ-1(a)through AQ-1(c) would continue to be required.

As this alternative would reduce buildout of the project area by 27% for residential uses and 24% for non-residential uses, operational emissions would be reduced. Nevertheless, emissions of ROG and NO_x would still exceed VCAPCD's daily thresholds (see Table 7-3). As with the proposed project, mitigation measures AQ-2(a) through AQ-2(e) would be required, but would not reduce emissions to below VCAPCD thresholds. Therefore, like the proposed project, this alternative would have a Class I, *significant and unavoidable*, impact on regional air quality.

Due to the reduced traffic generation associated with this alternative (see subsection 7.2.13 of this section), impacts related to carbon monoxide concentrations would be reduced. As with the proposed project, this impact would be Class III, *less than significant*.

Like the proposed project, this alternative would involve Annexation of nine parcels south of Teal Club Road that would be zoned for light industrial uses. Industrial uses may generate



odors near residential uses. However, with adherence to General Plan Policy CD-5.2 to create appropriate separation distances between odor-generators and sensitive uses, impacts related to odors would be Class III, *less than significant*, similar to the proposed project. As with the proposed project, no mitigation would be required.

**Table 7-3
Alternative 2 Estimated Operational Emissions**

Emission Source	Emissions Estimate (lbs/day)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Teal Club Specific Plan – Phase I:					
Area	30.8	0.7	59.5	0.3	0.3
Energy	0.4	3.1	1.4	0.3	0.3
Mobile	10.7	40.5	111.9	55.9	15.1
Subtotal	41.9	44.3	172.8	56.5	15.7
Additional Annexation Area:					
Area	8.0	<0.01	<0.01	<0.01	<0.01
Energy	0.1	1.2	1.0	0.1	0.1
Mobile	0.9	3.4	10.8	5.9	1.6
Subtotal	9.0	4.6	11.8	6.0	1.7
Alternative 2 Total Emissions	50.9	48.9	184.6	62.5	17.4
Proposed Project Total Emissions	64.2	62.5	243.9	82.4	22.9
VCAPCD Significance Threshold	25	25	N/A	N/A	N/A
Exceeds Threshold?	Yes	Yes	N/A	N/A	N/A

Source: Calculations using CalEEMod 2013.2.2. See Appendix C for calculations.

7.2.4 Biological Resources

This alternative would reduce development by 57.9 acres compared to the proposed project. However, the tree windrow located along Ventura Avenue would still be removed with this alternative. Therefore, impacts to nesting birds and monarch butterfly habitat in the windrow would be the same as the proposed project. Since this alternative would not remove as many acres of row crops as the proposed project (approximately 91.8 acres compared to 149.72 acres), impacts to the locally sensitive California horned lark, which nests in agricultural row crops where stubble or short vegetation is present, would be reduced. Nonetheless, approximately 91.8 acres of row crops would be removed with this alternative. Impacts to nesting birds and monarch butterflies would remain Class II, *significant but mitigable*, and mitigation measures BIO-1(a), BIO-1(b), BIO-2(a), and BIO-2(b) would continue to apply.

This alternative would not involve potential changes to a number of irrigation ditches in the project area and along Teal Club Road west of Patterson Road, but still may involve removal of other irrigation ditches present along the project area. Nonetheless, for the same reasons as described in Section 4.4, *Biological Resources*, these do not appear to be jurisdictional and do not contain riparian habitat or sensitive species. Impacts to jurisdictional areas would be less than significant, the same as under the proposed project.



7.2.5 Geology and Soils

This alternative would accommodate 267 fewer residential units and fewer non-residential structures when compared to full buildout of the proposed project. Therefore, development under this alternative would expose fewer structures and residents to geologic hazards, including groundshaking, liquefaction, and expansion. Although liquefaction and other seismic- and soil-related hazards would be reduced, this alternative would still allow the development of new residences in an area exposed geologic hazards. Impacts related to groundshaking would remain Class III, *less than significant*, while impacts related to soil instability would remain Class II, *significant but mitigable*, similar to the proposed project. Mitigation Measure GEO-2 would still be required to address soil instability impacts.

7.2.6 Greenhouse Gas Emissions

The Phase 1 Development Only Alternative would reduce residential development by 28% and non-residential development by 24% compared to the proposed project. Greenhouse gas (GHG) emissions would therefore be reduced when compared to the proposed project.

The proposed project would generate 13,245 metric tons of CO₂e annually, or approximately 2.00 metric tons of CO₂e per service population (refer to Table 4.6-6 in Section 4.6, *Greenhouse Gas Emissions/Climate Change*). By comparison, the Phase 1 Development Only Alternative would generate approximately 11,842 metric tons of CO₂e annually.

As noted in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, impacts related to GHG are determined based on the Scoping Plan threshold of 3.2 metric tons of CO₂e per year per service population (defined to include both residents and employees). As discussed in subsection 7.2.11, buildout of this alternative would add an estimated 2,786 new residents and 2,174 new employees. Therefore, the service population (sum of population and employees) that would be added to the City under this alternative would be 4,960.

Based on this service population, the total volume of GHG emissions projected to be generated by the Phase 1 Development Only Alternative equates to approximately 2.39 metric tons of CO₂e per service population, which is, counterintuitively, slightly higher than the proposed project's generation of 2.00 metric tons of CO₂e per service population. Even though less development would be constructed in this Alternative, a smaller service population would also be generated, which increases the emissions per service population. Impacts related to GHG emissions would therefore be higher than the proposed project but would remain Class III, *less than significant*.

7.2.7 Hazards and Hazardous Materials

This alternative would reduce residential and non-residential development, but would still involve the development of commercial, institutional, and light industrial land uses that could involve the use, storage, disposal or transportation of hazardous materials. However, like the proposed project, with required adherence to existing regulations, impacts would be Class III, *less than significant*.



This alternative would require the demolition of one existing residence in the Phase 1 area of the TCSP area that could contain asbestos or lead based paints. Similar to the proposed project, impacts related to lead and asbestos hazards would be Class II, *significant but mitigable*, and mitigation measures HAZ-2(a), HAZ-2(b), and HAZ-2(c) would continue to be required.

This alternative would reduce overall construction compared to the proposed project; therefore, fewer construction workers would be exposed to residual agricultural chemicals in the soil. This impact would be incrementally reduced compared to the proposed project, but would be Class II, *significant but mitigable*, and Mitigation Measure HAZ-3 would be required.

Fewer site workers and residents would be exposed to potential hazards from the Oxnard Airport under this alternative. These impacts would be reduced, but would continue to be Class II, *significant but mitigable*, and Mitigation Measures HAZ-5(a), HAZ-5(b), and HAZ-5(c) would be required.

7.2.8 Hydrology and Water Quality

Alternative 2 would reduce the area of development by 57.9 acres compared to the proposed project. Construction-related erosion and sedimentation, and pollutant discharges would therefore be reduced under this alternative. Compliance with NPDES Permit requirements and City ordinances would ensure that temporary construction related water quality impacts would ensure that impacts remain Class III, *less than significant*, similar to the proposed project.

As with the proposed project, this alternative would increase impervious surfaces and result in increased stormwater runoff and potentially impact water quality and affect groundwater recharge. However, this alternative would reduce the amount of paved areas compared to the proposed project as 57.9 acres would not be developed and would remain in agricultural production. Therefore, increases in peak stormwater runoff would be reduced compared to the proposed project. Like the proposed project, this alternative would involve on-site detention basins and would be required to maintain pre-development stormwater discharge rates. In addition, as the 57.9 acres would remain in agricultural production, sedimentation from agricultural runoff may be higher with this alternative than would occur with operation of the proposed project. Impacts related to sedimentation may increase with this alternative. Nonetheless, impacts under this alternative would remain Class III, *less than significant*, similar to the proposed project.

As with the proposed project, excavation and grading for development associated with this alternative could require temporary or permanent dewatering. Because less overall development would occur, the potential for this impact would be reduced when compared to the proposed project. Nevertheless, Mitigation Measure HYD-5 would still be required, and impacts would remain Class II, *significant but mitigable*.

The City of Oxnard is located within a dam inundation area. Because this alternative would reduce overall development potential, fewer structures would be located in potentially affected areas. However, the potential for dam failure is considered low and like the proposed project, impacts would be Class III, *less than significant*.



7.2.9 Land Use and Planning

The Phase 1 Development Only Alternative would result in a similar land use pattern as the proposed project in the Phase 1 portion of the TCSP area. The Phase 2 area would not be developed and there would be no change in land use. As outlined in Section 4.9, *Land Use and Planning*, the proposed project would be potentially consistent with all relevant policies of the City of Oxnard General Plan, LAFCo, and SCAG with incorporation of mitigation included in sections 4.1, *Aesthetics*, 4.2, *Agricultural Resources*, 4.3, *Air Quality*, 4.5, *Geology and Soils*, 4.7, *Hazards and Hazardous Materials*, 4.10, *Noise*, and 4.13, *Transportation and Traffic*. The TCSP area is pre-designated “Urban Village” in the City of Oxnard 2030 General Plan. Under this alternative, the Phase 2 area would not be developed and would remain in agricultural production. Therefore, this alternative is potentially inconsistent with the City’s 2030 General Plan vision for the project site. However, the Phase 1 area would be developed as is envisioned by the general plan. Though the Phase 2 area would remain in agricultural production, this would keep with the existing use of the area and would not create a significant environmental impact with respect to land use. Similar to the proposed project, impacts would be Class II, *significant but mitigable*.

7.2.10 Noise

This alternative would reduce residential and non-residential buildout as the Phase 2 portion of the TCSP would not be developed. Noise and vibration levels would be the same as the proposed project as the same amount and type of construction equipment would be used. However, the overall duration of noise and vibration associated with construction would be reduced as the duration of construction would be reduced. In addition, sensitive receptors located near the Phase 2 area would not be affected by construction noise and vibration. Similar to the proposed project, impacts would be Class III, *less than significant*, with adherence to City of Oxnard construction timing restrictions and no mitigation would be required.

Similar to the proposed project, this alternative would involve development adjacent to residential neighborhoods. Operational noise levels associated with on-site operations (such as noise generated by loading docks, mechanical equipment, deliveries, conversations, music, etc.) would be similar to the proposed project as the uses would be similar. However, as the Phase 2 area would not be developed, sensitive receptors near the Phase 2 area would not be exposed to as much operational noise. Nonetheless, sensitive receptors adjacent to the Phase 1 area, future sensitive receptors within the Phase 1 area, and existing sensitive receptors in the additional Annexation area would be exposed to operational noise. However, on-site uses would be subject to the City’s Noise Ordinance which prohibits sound levels above specified noise standards. Similar to the proposed project, impacts would be Class III, *less than significant*. As with the proposed project, no mitigation would be required.

As discussed in subsection 7.2.13, *Transportation and Traffic*, Phase 1 of the Specific Plan would generate approximately 10,449 average daily trips (ADT), or 3,162 (23%) fewer trips than would be generated by the proposed project. Consequently, noise level increases on roadways near the project area and within the TCSP area would be lower. Therefore, impacts would be reduced when compared to the proposed project and would remain Class III, *less than significant*.



Like the proposed project, this alternative involves residential uses near the Oxnard Airport. Future residences may be exposed to noise from aircraft flyovers. However, like the proposed project, this alternative would not locate residences within the 65 dBA noise contour. As such, noise associated with the airport would not exceed the City's standards. Impacts would remain Class III, *less than significant*.

7.2.11 Population, Education, and Housing

This alternative would generate 716 net new housing units (723 minus seven existing residence that would be demolished). Based on an average of 3.89 people/dwelling unit (SCAG, DOF 2020), this alternative would add an estimated 2,786 new residents to the City of Oxnard (716 net new residences x 3.89= 2,786). This is a 28% reduction when compared to the proposed project. This alternative would also generate 2,174 new employees (2,651 employees for proposed project - 477 employees associated with the business research park in the Phase 2 area), which is an 18% reduction (based on employment generation factors found in the *Employment Density Summary Report*, completed for the Southern California Association of Governments [SCAG] by The Natelson Co., Inc. [October, 2001]). As with the proposed project, the increase in population and employment would not exceed SCAG population, housing, or employment growth projections for the City of Oxnard. Impacts would remain Class III, *less than significant*.

This alternative would involve the demolition of one single-family residence in the TCSP area and approximately six residences in the additional Annexation area whereas the proposed project would remove two residences in the TCSP area and six residences in the additional Annexation area. Like the proposed project, this alternative would result in a net increase in housing, including affordable housing units. Therefore, impacts related to displacement would be Class III, *less than significant*, similar to the proposed project.

Based on the students per household generation rates used in the public services analysis for the proposed project (refer to Table 4.12-2 in Section 4.12, *Public Services and Recreation*), this alternative would generate approximately 446 new students (397 elementary and middle school students and 49 high school students, see Table 7-4). This represents a reduction of 156 students (23%) when compared to the proposed project. Therefore, demand for school services would also decrease. Impacts to schools would be Class III, *less than significant*, under this alternative, similar to the proposed project.

**Table 7-4
Alternative 2 Student Generation**

School District	Student Generation Factor (students per dwelling unit)	Proposed Project	Alternative 2	Proposed Project Students Generated	Alternative 2 Students Generated
Oxnard School District	1.0000	Single Family Detached - 220	Single Family Detached - 220	220	220
	0.3520	Single Family Attached ¹ - 770	Single Family Attached ¹ - 503	271	177
Oxnard Union High School District	0.08	Single Family Detached - 220	Single Family Detached - 220	18	18
	0.06	Multi Family - 770	Multi Family - 503	47	31
Total Students				556	446

¹ For purposes of this analysis all attached units were assumed to be single family attached (townhomes, condominiums, etc.) as this type of unit had the higher generation factor.

Number of units takes into account removal of existing single family residences on site.

Source: Oxnard School District School Facilities Needs Analysis, February 2019 and Oxnard Union High School District School District Fee Justification Report, June 2014.

7.2.12 Public Services and Recreation

This alternative would result in 267 fewer residential units than the proposed project. Consequently, demand for police and fire protection would incrementally decrease. Impacts to fire and police protection would continue to be Class II, *significant but mitigable*, and mitigation measures PS-1 and PS-2(a) and (b) would still apply.

This alternative would generate an estimated 2,868 new residents, which would require 8.6 acres of parkland according to the 3 acres per 1,000 residents threshold discussed in Section 4.12, *Public Services*. This alternative would involve 6.88 acres of parkland and open space (greenbelt), which would not satisfy the required 8.6 acres. Therefore, this alternative may increase demand for parkland such that significant impacts may occur. Mitigation may be needed in the form of payment of park impact fees or dedication of new parkland.

As discussed Section 4.12, *Public Services*, the City of Oxnard is currently below the ALA goal of 1.0 sf of library space per resident, with approximately 0.46 sf per resident. This alternative would add an estimated 2,786 new residents, which would result in a ratio of approximately 0.45 sf of library space per resident. Although the alternative would also introduce new employees, in general, employees are not likely to patronize libraries during working hours, as they are more likely to use libraries near their homes during non-work hours. As with the proposed project, this alternative would only incrementally affect the overall ratio of library sf per resident. As discussed, in Section 4.11, *Land Use and Planning*, the TCSP was anticipated in the City’s General Plan. The General Plan includes goals and policies to support the City’s public library system by developing funding, expanding library services, and expanding online access. It is not anticipated that the project would increase the use of existing libraries such that substantial physical deterioration of the facilities would occur or be accelerated. Should the City determine that future expanded library facilities are needed, new or expanded library facilities would be subject to CEQA environmental analysis and any identified mitigation measures



required to avoid, minimize, or reduce any identified environmental effects. Impacts would be similar to those of the proposed project and would remain Class III, *less than significant*.

7.2.13 Transportation and Traffic

As described in Section 4.13, *Transportation and Traffic*, in December 2019 California’s Third District Court of Appeal ruled that under SB 743, automobile delay may no longer be treated as a significant impact in CEQA analysis (*Citizens for Positive Growth & Preservation v. City of Sacramento*). Nonetheless, consistent with the analysis for the proposed project, an analysis related to roadway congestion is included for informational purposes.

This alternative would involve Phase 1 development only. Traffic impacts associated with Phase 1 development in the 2020 opening year were analyzed in Section 4.13, *Transportation and Traffic*. As shown in Table 7-5, Phase 1 of the Specific Plan would generate approximately 634 AM peak hour trips and 746 PM peak hour trips, and a total of 10,655 ADT. This would involve a reduction in 236 AM peak hour trips (27% reduction) and a reduction in 210 PM peak hour trips (22% reduction) compared to the proposed project. Therefore, impacts would be reduced compared to the proposed project. Similar to the proposed project, impacts to affected intersections would be Class III, *less than significant*. In addition, although these are not significant impacts under CEQA, recommended mitigation measures T-1(a) through T-1(g) related to roadway widenings would apply to this alternative.

**Table 7-5
Alternative 2 Trip Generation**

Land Use	SF/DU	AM Peak Hour Trips			PM Peak Hour Trips			ADT
		In	Out	Total	In	Out	Total	
Single-Family Residential	220	41	122	163	139	79	218	2,077
Multi-Family (Low-rise)	503	53	178	231	178	104	282	3,682
Neighborhood Commercial	60,000	173	115	288	360	360	720	7,200
Community Park	17.86.5	3	3	6	5	5	10	130
<i>Sub Total</i>		270	418	688	682	548	1,230	13,089
<i>Internal Trips</i>		9	19	28	152	136	288	1,932
<i>External Trips</i>		261	399	660	530	412	942	11,157
<i>Pass-by Trips</i>		17	12	29	107	89	196	502
Total Primary Trips		244	387	631	423	323	746	10,655

ADT = Average Daily Traffic, DU = Dwelling Units, TSF = Thousand Square Feet, Stu = Students
Source: Stantec, 2019 (see Appendix I)

Similar to the proposed project, this alternative would develop bicycle, pedestrian, and public transit facilities. Development would therefore be consistent the City’s General Plan and Bicycle Master Plan. Impacts would be similar to those of the proposed project and would remain Class III, *less than significant*.

As explained in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, based on the CalEEMod estimate, the proposed project would result in approximately 25,349,026 new annual VMT. The Phase 1 Development Only Alternative would reduce residential development by 28% and non-residential development by 24% compared to the proposed project. VMT would therefore be



reduced when compared to the proposed project. Since the VMT project would be well below the 15% reduction threshold that the OPR recommends, VMT under this alternative would also be below the threshold.

In addition, consistent with the proposed project, the Alternative is intended to provide for overall VMT reduction. As discussed above under Impact T-4 and in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, the TCSP site is located in an urbanized area immediately adjacent to alternative transit options and within walking distance of multiple commercial opportunities which would provide a range of goods and services to site residents, employees, and visitors. Commercial areas within walking distance include Esplanade Mall, Riverpark Town Center, and Oxnard Financial Plaza. The proposed development also incorporates dedicated pedestrian and bicycle paths, new bus stops and bus shelters. Finally, the TCSP is a mixed-use development that provides housing, jobs, and visitor amenities in proximity to transit options, jobs, and services. Based on these facts, the TCSP is consistent with the general goal of reducing GHG emissions by reducing VMT. Impacts would be similar to those of the proposed project and would remain Class III, *less than significant*.

Like the proposed project, this alternative would not increase hazards due to a design feature and would not result in inadequate emergency access. This alternative would involve agricultural uses adjacent to development. Adjacent agricultural uses may result in slow farm vehicles and equipment traveling on area roadways. However, farm vehicles would not utilize TCSP roadways. In addition, farm vehicles related to agricultural uses may travel westward to other agricultural uses, but would not often head eastward past the project area towards the City of Oxnard. Impacts would be similar to those of the proposed project and would remain Class III, *less than significant*.

7.2.14 Utilities and Energy

As shown in Table 7-5 and based on the wastewater demand factors used in Section 4.14, *Utilities and Energy* (Table 4.14-8), this alternative would generate an estimated 101 gallons of wastewater per minute.

**Table 7-6
 Alternative 2 Wastewater Generation**

Use	Alternative 2 Acres	Wastewater Generation Factor (gpad)	Overall Wastewater Generation (gpm) ¹	
			Proposed Project	Alternative 2
Single Family Residences	27.53	1,365	26.9	26.9
Multi-Family Residences	25.71	2,380	75.7	42.5
Commercial and Industrial	8.78	1,350	16.8	8.23
Total			119.4	77.63

gpad – Gallons per acre per day; gpm – Gallons per minute

¹ *gpm was calculated by multiplying the acreage for each use by the gpad and then dividing by 1,440 (the number of minutes in a day).*

This represents a reduction of approximately 54% when compared to the proposed project. Like the proposed project, the Oxnard Wastewater Treatment Plant has adequate capacity to serve this alternative. Impacts would be Class III, *less than significant*, similar to the proposed project.



Compared to the proposed project, this alternative would reduce residential buildout by 28% and would reduce non-residential buildout by 31%. Therefore, as shown on Table 7-7, potable water demand would be reduced by 42% under this alternative to 257.9 afy. This alternative would also reduce the amount of parkland by 11.88 acres. Therefore, non-potable water demand would be reduced by 63% to 9.7 afy. Impacts would remain Class III, *less than significant*. As with the proposed project, mitigation measures UTL-2(a) through UTL-2(c) would be recommended to ensure efficient connection to the water system and reduce onsite outdoor water use.

**Table 7-7
Alternative 2 Water Demand**

Use	Alternative 2 Acres	Daily Demand Factor per acre (gpd)	Overall Water Demand (afy) ^{1,2}	
			Proposed Project	Alternative 2
Potable Water Demand				
Residential – Low Density ³	27.53	2,250	69.4	69.4
Residential – High and Medium Density ⁴	25.71	6,000	307.7	172.8
Business Park/ Industrial	0	2,800	28.6	0
Commercial, Retail, Community ⁵	8.78	1,600	15.7	15.7
Total Potable Water Demand			421.4	257.9
Recycled Water Demand				
Residential – Low Density	27.53	0	0	0
Residential – High and Medium Density ⁴	25.71	0	0	0
Business Park	0	700	7.1	0
Commercial, Retail, Community ⁵	8.78	400	3.9	3.9
Park and Greenbelt	6.88	750	14.9	5.8
Total Recycled Water Demand			26.0	9.7
Total Water Demand			447	267.6

gpd – gallons per day; afy – acrefeet per year

¹ Total demand values rounded

² afy was calculated by multiplying the demand factor by the acreage, multiplying the result by 365 (number of days in a year) and then dividing by 3.068x10⁻⁶ (the number of gallons in an acre-foot)

³ Includes PA-1 and PA-10 as shown on Table 6-2

⁴ Includes PA-2, PA-3, PA-4, PA-5, and PA-12 as shown on Table 6-2

⁵ Includes retail, commercial, mixed use, community building, etc.

This alternative would result in less development than the proposed project, but development would be of the same type. In the 2007 Teal Club Infrastructure Review, Kennedy/Jenks Consultants determined that existing fire flow availability on the site is 4,500 gpm and fire flow availability would be 4,000 gpm at buildout. This exceeds the required fire flow of 3,000 gpm. This would be the same for this alternative. Impacts would be Class III, *less than significant*. As shown in Table 7-8, and based on the residential solid waste generation rates used in the public services analysis for the proposed project (refer to Table 4.14-11 in Section 4.14, *Utilities and Energy*), this alternative would generate approximately 4.7 tons of solid waste per day prior to the consideration of any waste reduction efforts. This represents a reduction of 2 tons per day (30%) when compared to buildout of the proposed project. Impacts would be reduced and, as with the proposed project, would be Class III, *less than significant*.



**Table 7-8
Alternative 2 Solid Waste Generation**

Use	Alternative 2 Units or SF	Solid Waste Generation Factor	Overall Solid Waste Generation (tpd) ¹	
			Proposed Project	Alternative 2
Single Residences	220 units	12.23 lbs/unit/day	1.34	1.34
Multi-Family Residences	503 units	12.23 lbs/unit/day	4.7	3.0
Commercial	60,000 sf	5 lbs/1,000 sf/day	0.15	0.15
Industrial	-	5 lbs/1,000 sf/day	0.33	-
Total			6.52	4.49

tpd – tons per day

¹ *tpd was calculated by multiplying the unit amount by the generation factor and then dividing by 2,000 (the number of pounds in a ton)*

As described in Section 4.14, *Utilities and Energy*, in February 2019, all residents in the City of Oxnard were automatically enrolled in Clean Power Alliance, a community choice energy program providing renewable electric energy transported and delivered via existing Southern California Edison infrastructure. As with the proposed project, during operation under this alternative, residential electricity customers would receive renewable electric energy from Clean Power Alliance, consistent with City General Plan and Energy Action Plan goals and policies. Furthermore, with implementation of Mitigation Measures AQ-2(b-e) applicants for all projects within the TCSP area would be required to increase building energy efficiency 15% beyond Title 24 to achieve Tier 1 “green building” standards, install solar panels on flat roofs, integrate passive energy conservation design elements, and maximize natural ventilation in new building design. Implementation of these mitigation measures would ensure efficient use of energy resources and would not preempt future energy development or conservation efforts. Similar to the proposed project, impacts would be Class III, *less than significant*.

7.3 ALTERNATIVE 3: REDUCED INTENSITY

This alternative would be similar to the proposed project with similar land uses and development patterns, but would replace the business research park area with single-family residential units. This alternative assumes 387 single-family dwelling units would be constructed (instead of the 220 under the proposed project) and 603 multi-family dwelling units would be constructed (instead of the 770 under the proposed project). In other words, 167 additional single-family units would be constructed and 167 fewer multi-family units would be constructed; the total number of dwelling units would remain the same as the proposed project. This alternative would also reduce the commercial/mixed-use building area by 10,000 square feet and would not involve the 132,000 square feet of business research park use. All other components of the proposed project would remain, including the 990 dwelling units.

In total, this alternative would reduce non-residential development in the TCSP area development by 142,000 square feet. The additional nine parcels south of Teal Club Road would still be annexed and zoned for light manufacturing, potentially facilitating up to 347,608 square feet of light industrial development. Overall, this alternative would result in 142,000 fewer square feet of non-residential development (a 26% reduction). See Figure 7-2 for the Reduced



Figure 7-2 Alternative 3, Reduced Intensity Alternative



Source: TEAL CLUB SPECIFIC PLAN



Intensity Alternative plan-view layout. Table 7-9 compares the characteristics of Alternative 3 to the proposed project.

**Table 7-9
 Comparison of Proposed Project to Alternative 3**

Land Use	Proposed Project			Alternative 3: Reduced Intensity		
	Acres	Dwelling Units	Building Square Footage	Acres	Dwelling Units	Building Square Footage
Residential						
PA-1 Detached Cluster Residential	17.52	140	-	17.52	140	-
PA-2 Detached Cluster Residential	10.01	80	-	10.01	80	-
PA-11 Detached Cluster Residential	-	-	-	23.94	167	-
Subtotal Single-Family Detached	27.53	220	-	51.47	387	-
PA-3 Attached Residential	9.6	145	-	9.60	145	-
PA-4 Attached Residential	5.54	88	-	5.54	88	-
PA-5 Attached Residential	10.64	240	-	10.57	240	-
PA-11 Attached Residential	15.64	167	-	0	0	-
PA-12 Attached Residential	4.43	100	-	8.35	100	-
Commercial/Mixed Use (Residential)	0	8	-	0	30	-
Subtotal Multi-Family	45.9	770	-	34.06	603	-
Total	73.4	990	-	85.53	990	-
Non-residential						
PA-8 Community Park	6.5	0	-	6.5	0	-
PA-9 Community Park	3.5	0	-	3.5	0	-
PA-10 Community Park	7.38	0	-	7.38	0	-
Beverly Dr. Greenbelt	0.38			0.38		
Parks & Open Space Subtotal	17.76	0	-	17.76	0	-
PA-6 Commercial/Mixed Use	4.35	0	10,000	4.35	0	10,000
PA-7 Urban Village Commercial	4.43	0	50,000	4.43	0	40,000
Commercial/Mixed Use Subtotal	8.78	0	60,000	8.78	0	50,000
PA-13 Business Research Park	6.19	0	88,000	0	0	0
PA-14 Business Research Park	2.92	0	44,000	0	0	0
Light Industrial Subtotal	9.11	0	132,000	0	0	0
Ventura Road	2.82	0	-	2.82	0	-



Land Use	Proposed Project			Alternative 3: Reduced Intensity		
	Acres	Dwelling Units	Building Square Footage	Acres	Dwelling Units	Building Square Footage
Doris Avenue	2.80	0	-	2.80	0	-
Patterson Road	0.30	0	-	0.30	0	-
Teal Club Road	7.20	0	-	7.20	0	-
Arterial Roadways Subtotal	13.12	0	-	13.12	0	-
Interior Roadways	22.18	0	-	19.07	0	-
Detention Basins	5.46	0	-	5.46	0	-
Interior Roadways & Misc. Subtotal	27.64	0	-	24.53	0	-
Total Specific Plan Area	149.72	990	192,000	149.72	990	50,000
Total Additional Annexation Area	11.4	-	347,608	11.4	-	347,608

7.3.1 Aesthetics

Development of the project area in accordance with this alternative would reduce the intensity of development, but the number of developed acres would remain the same. Therefore, development associated with this alternative would be visible from viewpoints along several public roadways, including Ventura Road, Patterson Road, Doris Avenue, Victoria Avenue, and Fifth Street which are identified in the Oxnard General Plan as routes within the City’s Scenic Highway System. However, similar to the proposed project, given the limited extent to which the project would affect scenic vistas, and the fact that views of the elements of these vistas, such as distant mountains and nearby agricultural lands, are readily available from nearby areas, impacts would be Class III, *less than significant*.

Like the proposed project, this alternative would replace scenic resources such as farmland and tree windrows. In addition, with development of the project area, the visual character and quality of the site would be substantially altered. Similar to the proposed project, impacts to visual character would be Class II, *significant but mitigable* and Mitigation Measure AES-2 would apply.

This introduction of light and glare to the area would be similar to the proposed project as the same acreage would be developed, but would be slightly reduced as the intensity of development would incrementally decrease. Impacts related to light and glare would therefore be slightly reduced under this alternative as compared to the proposed project and would continue to be Class III, *less than significant*.

7.3.2 Agricultural Resources

Although less overall development would be facilitated under the Reduced Intensity Alternative when compared to the proposed project, the same acreage would continue to be developed. As a result, this alternative would convert the same approximately 149.5 acres of “important farmland” to non-agricultural uses as the proposed project. Impacts related to the permanent loss of agricultural lands would therefore be the same and would remain Class I, *significant and unavoidable*. Mitigation Measure AG-1 would require the applicant to recorded



permanent agricultural conservation easements in order to help avert the future regional conservation of agricultural lands to the extent feasible. However, the impact to important farmland would remain significant and unavoidable due to the permanent, irreversible loss of important farmland within the TCSP area

Because development potential and land use pattern under this alternative would be similar to the proposed project, impacts resulting from conflicts between urban and agricultural uses would also be similar. Impacts related to agricultural compatibility would remain Class II, *significant but mitigable*, and mitigation measure AG-2 regarding interim agricultural buffers would continue to apply.

7.3.3 Air Quality

A project is consistent with the 2007 AQMP if its direct and indirect emissions are accounted for in the growth assumptions of the AQMP (or the most recent VCOG population projections) and the project is consistent with the policies in the AQMP. As noted in Section 4.3, *Air Quality*, the proposed project would be consistent with the AQMP because it would not result in population growth exceeding the most recent VCOG or General Plan population projections. The Reduced Density Alternative would include development of the same number of residential units and therefore the same population growth. Impacts would therefore be the same as those of the proposed project and would be Class III, *less than significant*.

The Reduced Density Alternative would reduce non-residential buildout by 26%. However, new construction would still generate temporary increases in localized air pollutant emissions. Impacts would remain Class II, *significant but mitigable*, similar to the proposed project, and mitigation measures AQ-1(a) through AQ-1(c) would continue to be required.

The Reduced Density Alternative would reduce non-residential development by 26%. See Table 7-10 for a summary of emissions associated with this alternative. Emissions of ROG and NO_x would exceed VCAPCD's daily thresholds under this alternative. Total emissions for Phase 1 would be higher, due to the increased number of single-family residences. Total emissions for all pollutants in Phase 2 would be lower and for the Annexation area, emissions would stay the same. Overall, emissions would be slightly lower; nevertheless, as with the proposed project, mitigation measures AQ-2(a) through AQ-2(d) would be required and the impact to regional air quality would be Class I, *significant and unavoidable*.



**Table 7-10
Alternative 3 Estimated Operational Emissions**

Emission Source	Emissions Estimate (lbs/day)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Teal Club Specific Plan – Phase I					
Area	30.6	0.7	59.5	0.3	0.3
Energy	0.4	3.1	1.4	0.2	0.2
Mobile	10.4	40.4	121.8	65.0	17.6
Subtotal	41.4	44.2	182.6	65.6	18.2
Teal Club Specific Plan – Phase II					
Area	10.0	0.3	22.0	0.1	0.1
Energy	0.2	1.4	0.6	0.1	0.1
Mobile	2.3	9.1	28.0	15.2	4.1
Subtotal	12.5	10.8	50.6	15.4	4.3
Additional Annexation Area					
Area	8.0	<0.01	<0.01	<0.01	<0.01
Energy	0.1	1.2	1.0	0.1	0.1
Mobile	0.9	3.4	10.8	5.9	1.6
Subtotal	9.0	4.6	11.8	6.0	1.7
Alternative 3 Total Emissions	101.2	49.6	294.4	57.0	16.4
Proposed Project Total Emissions	64.2	62.5	243.9	82.4	22.9
VCAPCD Significance Threshold	25	25	N/A	N/A	N/A
Exceeds Threshold?	Yes	Yes	N/A	N/A	N/A

Source: Calculations using CalEEMod 2013.2.2. See Appendix C for calculations.
Note: numbers may not add up due to rounding.

Due to the reduced traffic generation associated with this alternative (see subsection 7.3.13), impacts related to carbon monoxide concentrations would be reduced. As with the proposed project, this impact would be Class III, *less than significant*.

Like the proposed project, this alternative would involve Annexation of nine parcels south of Teal Club Road that would be zoned for light industrial uses. Industrial uses may generate odors near residential uses. However, with adherence to General Plan Policy CD-5.2 to create appropriate separation distances between odor-generators and sensitive uses, impacts related to odors would be Class III, *less than significant*, similar to the proposed project. As with the proposed project, no mitigation would be required.

7.3.4 Biological Resources

Although the Reduced Intensity Alternative would facilitate less intensive development when compared to the proposed project, the same acreage would continue to be developed. As a result, biological resources impacts would be similar to those resulting from the proposed project. Mitigation outlined in Section 4.4, *Biological Resources*, would continue to apply and impacts would remain Class II, *significant but mitigable*.

7.3.5 Geology and Soils

This alternative would accommodate the same number of residential units and 142,000 square feet (26%) less non-residential building area when compared to the proposed project. Therefore, development under this alternative would expose the same number of residents and a slightly



reduced number of structures to geologic hazards, including groundshaking, settlement, liquefaction, landsliding, erosion, and expansion. Although liquefaction and other seismic- and soil-related hazards would be reduced, this alternative would still allow the development of new residences and structures in an area exposed geologic hazards. Therefore, impacts related to groundshaking would remain Class III, *less than significant*, while impacts related to soil instability would remain Class II, *significant but mitigable*, similar to the proposed project. Mitigation Measure GEO-2 would still be required to address soil instability impacts.

7.3.6 Greenhouse Gas Emissions

The Reduced Density Alternative would reduce non-residential development by 26%. The proposed project would generate 13,245 metric tons of CO₂e annually, or approximately 2.00 metric tons of CO₂e per service population (refer to Table 4.6-6 in Section 4.6, *Greenhouse Gas Emissions/Climate Change*). As shown in Table 70-11, in comparison, the Reduced Density Alternative would generate 10,210 metric tons of CO₂e. This represents a 23% reduction in total GHG emissions.

**Table 7-11
Alternative 3 Greenhouse Gas Emissions**

Emission Source	Annual Emissions (CO₂e)
Amortized Construction	323 metric tons
Operational	
Area	12 metric tons
Energy	1,972 metric tons
Solid Waste	473 metric tons
Water	528 metric tons
Mobile	8,873 metric tons
Total	10,210 metric tons
Service Population	6,112
Alternative 3 Emissions per Service Population	1.67 metric tons
Proposed Project Emissions per Service Population	2.00 metric tons

See Appendix C for calculations and for GHG emission factor assumptions

As noted in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, impacts related to GHG are determined based on the Scoping Plan threshold of 3.2 metric tons CO₂e per year per service population (defined to include both residents and employees). As shown in subsection 7.3.11, the Reduced Density Alternative would add an estimated 3,909 residents and 2,150 new employees. Therefore, the service population (sum of population and employees) that would be added to the City under this alternative would be 6,059.

Based on this service population, the total volume of GHG emissions projected to be generated by the Reduced Density Alternative equates to approximately 1.67 metric tons CO₂e per service population, which is slightly lower than the proposed project's generation of 2.00 metric tons CO₂e per service population. Impacts related to GHG emissions would therefore be slightly lower than the proposed project and would remain Class III, *less than significant*.



7.3.7 Hazards and Hazardous Materials

This alternative would reduce non-residential development, but would still involve the development of commercial, institutional, and light industrial land uses that could involve the use, storage, disposal or transportation of hazardous materials. However, as with the proposed project, required adherence to existing regulations would reduce impacts to Class III, *less than significant*.

This alternative would require the demolition of the same structures that could contain asbestos or lead based paints that would be demolished under the proposed project. Impacts related to lead and asbestos hazards would be similar to those of the proposed project and would be Class II, *significant but mitigable*. Mitigation measures HAZ-2(a), HAZ-2(b), and HAZ-2(c) would be required.

This alternative would reduce non-residential development by 26%. Since this alternative would reduce overall construction compared to the proposed project, fewer construction workers would be exposed to residual agricultural chemicals in the soil. This impact would be incrementally reduced compared to the proposed project, but would be Class II, *significant but mitigable*, and Mitigation Measure HAZ-3 would be required to health risks associated with soil contamination.

Fewer site workers and residents would be exposed to potential hazards from the Oxnard Airport under this alternative. These impacts would be reduced, but would continue to be Class II, *significant but mitigable*, and Mitigation Measures HAZ-5(a), HAZ-5(b), and HAZ-5(c) would be required.

7.3.8 Hydrology and Water Quality

Though the overall acreage of development would remain the same, Alternative 3 would reduce non-residential development by 26% compared to the proposed project. Construction-related erosion and sedimentation, and pollutant discharges would therefore be reduced under this alternative. Compliance with NPDES Permit requirements and City ordinances would ensure that temporary construction-related water quality impacts would ensure that impacts would be Class III, *less than significant*, similar to the proposed project.

As with the proposed project, this alternative would increase impervious surfaces and result in increased stormwater runoff and potentially impact water quality and affect groundwater recharge. This alternative may slightly reduce the amount of paved areas compared to the proposed project as this alternative would replace the proposed Business Research Park with single-family homes. Therefore, the increase in peak stormwater runoff would be incrementally reduced compared to the proposed project. Like the proposed project, this alternative would include on-site detention basins and would be required to maintain pre-development stormwater discharge rates. Therefore, impacts under this alternative would remain Class III, *less than significant*, similar the proposed project.

As with the proposed project, excavation and grading for development associated with this alternative could require temporary or permanent dewatering. Because less overall development would occur, the potential for this impact would be reduced when compared to



the proposed project. Nevertheless, Mitigation Measure HYD-5 would still be required, and impacts would remain Class II, *significant but mitigable*.

The City of Oxnard is located within a dam inundation area. Because this alternative would reduce overall development potential, fewer structures would be located in potentially affected areas. However, the potential for dam failure is considered low and like the proposed project, impacts would be Class III, *less than significant*.

7.3.9 Land Use and Planning

The Reduced Density Specific Plan Alternative would result in a similar land use pattern as the proposed project, but would facilitate slightly less overall development. As outlined in Section 4.9, *Land Use and Planning*, the proposed project would be consistent with all relevant policies in the City of Oxnard General Plan, LAFCo policies, and SCAG policies with incorporation of mitigation included in sections 4.1, *Aesthetics*, 4.2, *Agricultural Resources*, 4.3, *Air Quality*, 4.5, *Geology and Soils*, 4.7, *Hazards and Hazardous Materials*, 4.10, *Noise*, and 4.13, *Transportation and Traffic*. This alternative would also be consistent with applicable policies and impacts would remain Class II, *significant but mitigable*.

7.3.10 Noise

The Reduced Intensity Alternative would result in a similar land use pattern as the proposed project but would reduce non-residential development by 142,000 square feet, a 26% reduction. Temporary construction-related noise and ground borne vibrations would therefore be reduced under this alternative. The overall duration of noise and vibration associated with construction would also be reduced as the duration of construction would be reduced. Similar to the proposed project, impacts would be Class III, *less than significant*, with adherence to City of Oxnard construction timing restrictions and no mitigation would be required.

Similarly to the proposed project, this alternative would involve development adjacent to residential neighborhoods. Operational noise levels associated with on-site operations (such as noise generated by loading docks, mechanical equipment, deliveries, conversations, music, etc.) would be similar to the proposed project as the developed area and land uses would be similar. Sensitive receptors adjacent to the project area, future sensitive receptors within the project area, and existing sensitive receptors in the additional Annexation area would be exposed to operational noise. However, on-site uses would be subject to the City's Noise Ordinance which prohibits sound levels above specified noise standards. Similar to the proposed project, impacts would be Class III, *less than significant*. As with the proposed project, no mitigation would be required.

As discussed in subsection 7.3.13, *Transportation and Traffic*, this alternative would result in 11,743 (14%) fewer ADT than would be generated by the proposed project. Consequently, noise level increases on roadways near the project area would be lower. Therefore, impacts would be reduced when compared to the proposed project and would remain Class III, *less than significant*.

Like the proposed project, this alternative involves residential uses near the Oxnard Airport. Future residences may be exposed to noise from aircraft flyovers. However, like the proposed project, this alternative would not locate residences within the 65 dBA noise contour. As such, noise associated with the airport would not exceed the City's standards. Impacts would remain Class III, *less than significant*.

7.3.11 Population, Education and Housing

This alternative would generate the same number of housing units as the proposed project; therefore, the number of new residents would remain the same as under the proposed project (3,909 new residents). However, this alternative would reduce the number of employees generated as non-residential development would be reduced by 26%. Based on employment generation shown in Section 4.11, *Population and Housing*, this alternative would generate 2,150 employees, a 19% reduction compared to the proposed project (2,651 employees for proposed project - 477 employees associated with Business Research Park - 24 employees associated with commercial/retail development). Like the proposed project, this alternative would not exceed SCAG population, housing, or employment growth projections for the City of Oxnard. As with the proposed project, impacts would remain Class III, *less than significant*.

This alternative would displace the same housing units (eight) as the proposed project, and would generate the same level of new residential development. Impacts related to displacement would be Class III, *less than significant*, similar to the proposed project.

This alternative would result in the same overall number of housing units (990) compared to the proposed project. However, the number of single family detached residents would increase (from 220 to 387) and the number of single family attached residences would decrease (from 770 to 603). Based on the students per household generation rates used in the public services analysis for the proposed project (refer to Table 4.12-2 in Section 4.12, *Public Services and Recreation*), this alternative would generate approximately 632 new students (564 elementary and middle school students and 68 high school students, see Table 7-12). This represents an increase of 76 students (14%) when compared to the proposed project. Therefore, demand for school services would also increase. Nonetheless, impacts to schools would be Class III, *less than significant*, with payment of school impact fees under this alternative, similar to the proposed project.



**Table 7-12
Alternative 3 Student Generation**

School District	Student Generation Factor (students per dwelling unit)	Proposed Project	Alternative 3	Proposed Project Students Generated	Alternative 3 Students Generated
Oxnard School District	1.00	Single Family Detached - 220	Single Family Detached - 387	220	387
	0.3520	Single Family Attached ¹ - 770	Single Family Attached ¹ - 503	271	177
Oxnard Union High School District	0.08	Single Family Detached - 220	Single Family Detached - 387	18	31
	0.06	Multi Family - 770	Multi Family - 603	47	37
Total Students				556	632

¹ For purposes of this analysis all attached units were assumed to be single family attached (townhomes, condominiums, etc.) as this type of unit had the higher generation factor.
Number of units takes into account removal of existing single family residences on site.
Source: Oxnard School District School Facilities Needs Analysis, February 2019 and Oxnard Union High School District School District Fee Justification Report, June 2014.

7.3.12 Public Services and Recreation

This alternative would result in the same number of residential units as the proposed project, but would reduce non-residential development. Generally, this alternative would result in the same level of demand for police and fire protection services. Therefore, impacts to fire and police protection would be similar and would be Class II, *significant but mitigable*. Mitigation measures PS-1 and PS-2 would continue to apply.

As discussed Section 4.12, *Public Services*, the City of Oxnard is currently below the ALA goal of 1.0 sf of library space per resident, with approximately 0.46 sf per resident. This alternative would add an estimated 3909 new residents, the same as under the proposed project. Although the alternative would also introduce new employees, in general, employees are not likely to patronize libraries during working hours, as they are more likely to use libraries near their homes during non-work hours. As with the proposed project, this alternative would only incrementally affect the overall ratio of library sf per resident. As discussed, in Section 4.11, *Land Use and Planning*, the TCSP was anticipated in the City’s General Plan. The General Plan includes goals and policies to support the City’s public library system by developing funding, expanding library services, and expanding online access. It is not anticipated that the project would increase the use of existing libraries such that substantial physical deterioration of the facilities would occur or be accelerated. Should the City determine that future expanded library facilities are needed, new or expanded library facilities would be subject to CEQA environmental analysis and any identified mitigation measures required to avoid, minimize, or reduce any identified environmental effects. Impacts would be similar to those of the proposed project and would remain Class III, *less than significant*.

7.3.13 Transportation and Traffic

As described in Section 4.13, *Transportation and Traffic*, in December 2019 California’s Third District Court of Appeal ruled that under SB 743, automobile delay may no longer be treated as



a significant impact in CEQA analysis (*Citizens for Positive Growth & Preservation v. City of Sacramento*). Nonetheless, consistent with the analysis for the proposed project, an analysis related to roadway congestion is included for informational purposes.

The Reduced Intensity Alternative was analyzed in a traffic study prepared for the proposed project by Stantec in 2014 (refer to Appendix F for complete study). Table 7-13 summarizes the trip generation for this alternative.

**Table 7-13
 Alternative 3 Trip Generation Summary**

Land Use	Units	AM Peak Hour			PM Peak Hour			ADT
		In	Out	Total	In	Out	Total	
Single-Family Residential	387 DU	72	215	287	244	139	383	3,653
Multi-Family Residential	603 DU	64	213	277	213	125	338	4,414
Neighborhood Commercial	50 TSF	144	96	240	300	300	600	6000
Community Park	17.8 Acre	14	10	24	90	74	164	420
<i>Sub Total</i>		287	531	818	771	578	1,349	14,423
<i>Internal Trips</i>		17	33	50	147	128	275	2,146
<i>External Trips</i>		270	498	768	624	450	1,074	12,277
<i>Pass-by Trips</i>		14	10	24	90	74	164	4220
Total		256	488	744	534	376	910	11,857

ADT = Average Daily Traffic, DU = Dwelling Units, TSF = Thousand Square Feet
 Source: Stantec, 2019

The Reduced Intensity Alternative would have a trip generation of 744AM peak hour trips, 910 PM peak hour trips, and 11,857 average daily trips. Compared to the proposed project, this alternative would reduce trip generation by 123 trips (14%) for the AM peak hour, 46 trips (5%) in the PM peak hour. Therefore, impacts would be reduced compared to the proposed project. Similar to the proposed project, impacts to affected intersections would be Class III, *less than significant*. In addition, although these are not significant impacts under CEQA, recommended mitigation measures T-1(a) through T-1(g) related to roadway widenings would apply to this alternative.

As explained in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, based on the CalEEMod estimate, the proposed project would result in approximately 25,349,026 new annual VMT. This alternative would reduce non-residential development by 26% compared to the proposed project. VMT would therefore be reduced when compared to the proposed project. Since the VMT project would be well below the 15% reduction threshold that the OPR recommends, VMT under this alternative would also be below the threshold.

In addition, consistent with the proposed project, the Alternative is intended to provide for overall VMT reduction. As discussed above under Impact T-4 and in Section 4.6, *Greenhouse Gas Emissions/Climate Change*, the TCSP site is located in an urbanized area immediately adjacent to alternative transit options and within walking distance of multiple commercial opportunities which would provide a range of goods and services to site residents, employees, and visitors. Commercial areas within walking distance include Esplanade Mall, Riverpark Town Center, and Oxnard Financial Plaza. The proposed development also incorporates dedicated pedestrian



and bicycle paths, new bus stops and bus shelters. Finally, the TCSP is a mixed-use development that provides housing, jobs, and visitor amenities in proximity to transit options, jobs, and services. Based on these facts, the TCSP is consistent with the general goal of reducing GHG emissions by reducing VMT. Impacts would be similar to those of the proposed project and would remain Class III, *less than significant*.

Similar to the proposed project, this alternative would develop bicycle, pedestrian, and public transit facilities. Development would therefore be consistent the City’s General Plan and Bicycle Master Plan. Impacts would be similar to those of the proposed project and would remain Class III, *less than significant*.

Like the proposed project, this alternative would not increase hazards due to a design feature or incompatible use and would not result in inadequate emergency access. Impacts would be similar to those of the proposed project and would remain Class III, *less than significant*.

7.3.14 Utilities and Energy

As shown in Table 7-14 and based on the wastewater demand factors used in Section 4.14, *Utilities and Energy* (Table 4.14-8), this alternative would generate an estimated 114.83 gallons of wastewater per minute. This represents a reduction of approximately 4% when compared to the proposed project. The Oxnard Wastewater Treatment Plant has adequate capacity to serve either the proposed project or this alternative. Impacts would be Class III, *less than significant but*, the same as the proposed project.

**Table 7-14
Alternative 3 Wastewater Generation**

Use	Alternative 3 Acres	Wastewater Generation Factor (gpad)	Overall Wastewater Generation (gpm) ¹	
			Proposed Project	Alternative 3
Single Residences	51.47	1,365	26.0	48.7
Multi-Family Residences	34.06	2,380	75.6	57.9
Commercial and Industrial	8.78	1,350	16.77	8.23
Total			118.37	114.83

gpad – Gallons per acre per day

gpm – Gallons per minute

¹ *gpm was calculated by multiplying the acreage for each use by the gpad and then dividing by 1,440 (the number of minutes in a day).*

Compared to the proposed project, this alternative would reduce non-residential buildout by 31%. The land that would have been developed with industrial uses would be developed with residential use. As shown on Table 7-15, this transfer of proposed land use would reduce water demand. Impacts would remain Class III, *less than significant*. Similar to the proposed project, mitigation measures UTL-2(a) through UTL-2(c) would be recommended to ensure efficient connection to the water system and reduce onsite outdoor water use.



**Table 7-15
Alternative 3 Water Demand**

Use	Alternative 3 Acres	Daily Demand Factor per acre (gpd)	Overall Water Demand (afy) ^{1,2}	
			Proposed Project	Alternative 3
Potable Water Demand				
Residential – Low Density ³	51.47	2,250	69.4	129.7
Residential – High and Medium Density ⁴	34.06	6,000	307.7	228.9
Business Park/ Light Industrial	0	2,800	28.6	0
Commercial/ Mixed-Use ⁵	8.78	1,600	15.7	15.7
Total Potable Water Demand			421.4	374.3
Recycled Water Demand				
Residential – Low Density ⁶	51.47	0	0	0
Residential – High and Medium Density ⁴	34.06	0	0	0
Industrial	0	700	7.1	0
Commercial, Retail, Community ⁵	8.78	400	3.9	3.9
Park and Greenbelt	17.76	750	14.9	14.9
Total Recycled Water Demand			26.0	18.8
Total Water Demand			447	366.1

gpd – gallons per day, afy – acrefeet per year

¹ Total demand values rounded

² afy was calculated by multiplying the demand factor by the acreage, multiplying the result by 365 (number of days in a year) and then dividing by 3.068x10⁶ (the number of gallons in an acrefoot)

³ Includes PA-1, PA-10, and PA-11 as shown on Table 6-2

⁴ Includes PA-2, PA-3, PA-4, PA-5, and PA-12 as shown on Table 6-2

⁵ Includes retail, commercial, mixed use, community building, etc.

Compared to the proposed project, this alternative would reduce non-residential buildout by 26%. Potable and non-potable water demand would be similar to the proposed project under this alternative. This alternative would also slightly reduce the amount of parkland and other irrigated landscaping.

This alternative would result in less development than the proposed project, but development would be of the same type. In the 2007 Teal Club Infrastructure Review, Kennedy/Jenks Consultants determined that under fire flow conditions there is existing fire flow availability on the site of 4,500 gpm and ultimate fire flow availability of 4,000 gpm at buildout. This is in excess of the required flow of 3,000 gpm. This would be the same for this alternative. Impacts would be Class III, *less than significant*.

As shown on Table 7-16 and based on the residential solid waste generation rates used in the public services analysis for the proposed project (refer to Table 4.14-11 in Section 4.14, *Utilities and Energy*), this alternative would generate approximately 6.38 tons of solid waste per day prior to the consideration of any waste reduction efforts. This represents a decrease of 0.4 tons per day (5.2% less) when compared to buildout of the project. Impacts would be reduced, and would continue to be Class III, *less than significant*.



**Table 7-16
Alternative 3 Solid Waste Generation**

Use	Alternative 3 Units or SF	Solid Waste Generation Factor	Overall Solid Waste Generation (tpd) ¹	
			Proposed Project	Alternative 3
Single Residences	387 units	12.23 lbs/unit/day	1.34	2.36
Multi-Family Residences	603 units	12.23 lbs/unit/day	4.70	3.68
Commercial	50,000 sf	5 lbs/1000 sf/day	0.15	0.13
Industrial	-	5 lbs/1000 sf/day	0.33	-
Total			6.52	6.17

tpd – tons per day

¹ *tpd was calculated by multiplying the unit amount by the generation factor and then dividing by 2,000 (the number of pounds in a ton)*

As described in Section 4.14, *Utilities and Energy*, in February 2019, all residents in the City of Oxnard were automatically enrolled in Clean Power Alliance, a community choice energy program providing renewable electric energy transported and delivered via existing Southern California Edison infrastructure. As with the proposed project, during operation under this alternative, residential electricity customers would receive renewable electric energy from Clean Power Alliance, consistent with City General Plan and Energy Action Plan goals and policies. Furthermore, with implementation of Mitigation Measures AQ-2(b-e) applicants for all projects within the TCSP area would be required to increase building energy efficiency 15% beyond Title 24 to achieve Tier 1 “green building” standards, install solar panels on flat roofs, integrate passive energy conservation design elements, and maximize natural ventilation in new building design. Implementation of these mitigation measures would ensure efficient use of energy resources and would not preempt future energy development or conservation efforts. Similar to the proposed project, impacts would be Class III, *less than significant*.

7.4 ALTERNATIVE SITES

A discussion of alternative sites is needed if the project “may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved” at another site. Several criteria form the basis of whether alternative sites need to be considered in detail. These criteria take the form of the following questions:

1. *Could the size and other characteristics of another site physically accommodate the project?*
2. *Is another site reasonably available for acquisition?*
3. *Is the timing of carrying out development on an alternative site reasonable for the applicant?*
4. *Is the project economically feasible on another site?*
5. *What are the land use designation(s) of alternative sites?*
6. *Does the lead agency have jurisdiction over alternative sites? and*
7. *Are there any social, technological, or other factors that may make the consideration of alternative sites infeasible?*

Alternative sites generally need to be of sufficient size to accommodate development envisioned under the proposed project and such sites do not exist in the City of Oxnard. There are no potential alternative project sites in the local vicinity that are similar in acreage and could achieve the project objectives. Consequently, because relocation of the TCSP to an alternative site is not feasible, discussion of the impacts of alternative sites is not warranted.



7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of the environmentally superior alternative among the options studied. When the “No Project” alternative is determined to be environmentally superior, CEQA also requires identification of the environmentally superior alternative among the development options.

Table 7-17 indicates whether each alternative’s environmental impact is greater, lesser, or similar to the proposed project. As shown therein, the No Project – No Development would avoid all of the proposed project impacts and would be environmentally superior to the proposed project. However, this alternative would not fulfill the project objectives.

Among the other alternatives being considered, the Phase 1 Only Development alternative could be considered environmentally superior, as it would reduce impacts in many issue areas, due primarily to the 57-acre reduction in the development area. This alternative would reduce, but not eliminate, the Class I impacts related to Air Quality and Agricultural Resources. This alternative would generally meet the project objectives, although fewer housing units, office uses and public park acreage would be constructed.



**Table 7-17
 Comparison of Environmental Impacts of Alternatives**

Issue	Proposed Project	Alternative 1: No Project – No Development	Alternative 2: Phase 1 Development Only	Alternative 3: Reduced Intensity
Aesthetics	=	+	+/=	=
Agriculture	=	+	+	=
Air Quality	=	+	+/=	+/=
Biological Resources	=	+	+/=	=
Geology and Soils	=	+	+/=	=
Greenhouse Gas Emissions/Climate Change	=	+	+/=	+/=
Hazards and Hazardous Materials	=	+	+/=	=
Hydrology and Water Quality	=	+	+/=	=
Land Use and Planning	=	+	=	=
Noise	=	+	+/=	=
Population, Education, and Housing	=	+	+/=	=
Public Services and Recreation	=	+	+/-	+/=
Transportation and Traffic	=	+	+/=	+/=
Utilities and Energy	=	+	+	=
Overall	<i>n/a</i>	+	+/=	+/=

+Superior to the proposed project
 - Inferior to the proposed project
 = Similar impact to the proposed project
Bold typeface indicates a significant and unavoidable (Class I) impact.



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8.0 REFERENCES AND PREPARERS

8.1 REFERENCES

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