

Proposed Middle School Expansion Project Mitigation Measures

Agriculture and Forestry Resources: Significant and unavoidable impact associated with the loss of important farmland. Mitigation Measure AG-1 will minimize this impact.

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

Air Quality: Potential impact on short-term pollutant concentrations.

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

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

Biological Resources: Potential impacts to special status species and nesting birds.

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

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

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

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

Cultural Resources: Necessary monitoring, potential inadvertent discoveries, and potential indirect visual impacts to historic ranch buildings.

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

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

CUL-3 Inadvertent Discovery Plan: Prior to any proposed construction ground disturbing activities within the project Site, the District Project Manager shall require the construction contractor to retain a Secretary of Interior qualified archaeologist to prepare an Inadvertent Discovery Plan for the proposed project. The Inadvertent Discovery Plan will provide protocols and notification procedures in the event of an inadvertent discovery. During Project construction (e.g., ground disturbing activities such as vegetation removal, excavation, trenching, grading), should subsurface

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

Geology and Soils: Potential risk related to seismic ground shaking, potential soil erosion, and potential impacts to paleontological resources.

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

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

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

- Full-time monitoring by a qualified paleontologist during all grading and excavation extending more than 10 feet bgs or beyond Holocene deposits.

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

Provide brochure of environmental awareness training.

Hazards and Hazardous Materials: Potential hazards and hazardous material impacts that may result from implementation of the proposed project.

HAZ-1: The handling of potentially hazardous materials and substances, and generation of hazardous waste at the new DTPF would be performed under federal, state, and local laws and regulations with regulatory oversight, including but not limited to the DTSC, the City of Oxnard, and County of Ventura.

HAZ-2: Additional step out sampling should be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should be performed at sample location SS-35. Once the extent of OCPs at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of the RDV Expansion Project. The OCP and TPH housekeeping soil removal action will be considered complete following DTSC granting a No Further Action status to the project Site.

Hydrology and Water Quality: Potential impacts to surface or groundwater quality, groundwater supply, and potential release of pollutants due to inundation.

HYDRO-1: If perched groundwater is encountered during construction, the RSD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein.

HYDRO-2: The proposed project shall meet its City of Oxnard Water Neutrality Policy requirements by completing at least one of the following:

Transfer of existing FCGMA groundwater allocations to the City;

Contributing to increased efficiency by funding City water conservation programs;

Funding recycled water retrofit projects; or

Providing additional water supplies.

HYDRO-3: The RSD shall develop and implement an evacuation plan to be implemented in conjunction with the County of Ventura OES Dam Failure Response Plan.

Noise: Potential impacts associated with construction noise. The following Mitigation Measure will be implemented for the proposed project.

N-1: Construction noise levels fluctuate depending on the construction phase, equipment types and duration of use; distance between noise source and sensitive receptor; and the presence or absence of barriers between noise source and receptors. Therefore, the RSD should require construction contractors to limit standard construction activities as follows:

- Equipment and trucks used for proposed project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible. In addition, the time allowed for equipment and trucks to idle will be limited to the extent practicable.
- Stationary noise sources shall be located as far from adjacent receptors as possible and shall be muffled and enclosed within temporary sheds, incorporate insulation barriers or other measures to the extent feasible.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for proposed project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. However, where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible. This could achieve a reduction of 5 dBA. Quieter procedures shall be used such as drilling rather than impact equipment whenever feasible.
- Heavy construction equipment operations should be limited during the school period when classrooms are being utilized in the adjacent middle school buildings.
- When heavy construction activities are located within 75 feet of a residential structure, deploy a temporary portable sound barrier between the construction activities and nearest sensitive receptor.

Transportation: Potential impacts to the circulation system and cumulative traffic impacts.

TRAF-1: School Traffic Management Plan (TMP). RSD develop a school TMP to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps).

TRAF-2: Rose Avenue/Walnut Drive Intersection. The County's Local Roadway Safety Plan provides several general countermeasures focused on making the path of travel clearer, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement, which will require a longer mast arm, and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times. This may require modifications to the northeast corner (ADA improvements, installation of pedestrian push button post).

TRAF-3: Auto Center Drive/Collins Street Intersection (Project-Specific and Cumulative). The project-specific analysis found that the proposed project would contribute to the delays

experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. The low side street volumes (76 peak hour trips in the p.m. peak hour) and delays would not satisfy any traffic signal warrants. The southbound approach is controlled by a stop sign and contains a shared left-right turn lane. Prohibiting parking along the west curb extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole, however the southbound approach would continue to operate at LOS D. Similarly existing plus project conditions, the southbound approach would continue to operate at LOS D after the restripe to separate turning lanes. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. The intersection would not satisfy traffic signal warrants under cumulative plus project conditions.

Tribal and Cultural Resources: Potential impacts for existing tribal cultural resources.

The following two Mitigation Measures will be implemented for the proposed project:

CUL 2 (Cultural Worker Awareness Training) and **CUL 3** (Inadvertent Discovery Plan) as listed under Cultural Resources.

Utilities and Service Systems: Potential impacts to water supply, existing wastewater treatment facilities, and sewer systems.

UTIL-1: RSD shall submit the anticipated sewer flow rates for the proposed project to the City so that it can be analyzed using the City's sewer model. Based on the results, RSD shall coordinate with the City regarding the final sewer design including any required improvements needed to provide adequate sewer service to the project Site.