

# **Final Supplemental Environmental Impact Report Volume I**

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

### **Volume I: Response to Comments on the Draft SEIR**

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June 13, 2025

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## APPENDICES

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### APPENDIX A: MITIGATION MONITORING AND REPORTING PROGRAM

## ACRONYMS/ABBREVIATIONS

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

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

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

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

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

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

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

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

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

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



## 1.0 INTRODUCTION

The Rio del Valle Middle School Existing Campus Expansion Master Plan Supplemental Environmental Impact Report (SCH No. 2022060117) (hereafter “SEIR”) has been prepared pursuant to the California Environmental Quality Act (CEQA) to address the potential environmental effects of modifications to the Rio del Valle Middle School Existing Campus Expansion Master Plan (hereafter “modified project”) and considered by the Rio School District (hereafter “RSD” or “the District”) in connection with its public consideration of requested approvals for the modified project.

This Supplemental Environmental Impact Report (SEIR) has been prepared to describe the disposition of environmental issues raised in the comments received on the Draft SEIR and to evaluate the potential environmental impacts of the modified project, as required under CEQA (California Public Resources Code (PRC) § 21000 et seq.). The SEIR focuses on revisions to the project, including changes to the annexation plan (excluding the northern campus expansion area from annexation into the City of Oxnard), the relocation of the District Transportation and Parking Facility (DTPF) to the southeast corner of the southern campus expansion area, adjustments to parking and student drop-off areas along Rose Avenue, and updated phasing and scheduling of improvements. This SEIR has been completed in accordance with CEQA and the CEQA Guidelines (Title 14, California Code of Regulations, Section 15163), serving as a supplement to the District-certified Final Environmental Impact Report (FEIR) to ensure that the environmental review adequately addresses the modified project.

### 1.1 FINAL EIR REQUIREMENTS

Table 1-1 identifies the required content of a Supplemental Environmental Impact Report (SEIR) per Section 15163 of the CEQA Guidelines and where it can be located within this document.

**Table 1-1** Final SEIR Content

| Required Final SEIR Content Per Section 15163 of the CEQA Guidelines                                               | Where it is located in this SEIR                                                                                                                                               |
|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The information necessary to make the previous EIR adequate for the project as revised                             | SEIR Document, Sections 1.0 through 5.0; Appendices A through F                                                                                                                |
| Comments and recommendations received on the Draft SEIR either verbatim or in Summary.                             | Final SEIR Volume I, Section 2.0, Comments and Response to Comments                                                                                                            |
| The responses of the Lead Agency to significant environmental points raised in the review and consultation process | Final SEIR Volume I, Section 2.0, Comments and Response to Comments                                                                                                            |
| Any other information added by the Lead Agency.                                                                    | Final SEIR Volume I, Section 3.0, SEIR Additions and Corrections; SEIR Document with underline to indicate added text and strikeout to identify removed text where applicable. |

Volume I of the Final SEIR for the modified project has been prepared to provide responses to comments received on the Draft SEIR and is to be used in conjunction with, rather than in place of, the District-certified Final Environmental Impact Report (FEIR) and the SEIR document.

Therefore, the information in this SEIR Volume I, which supplements the FEIR, fulfills state CEQA requirements for a supplemental EIR.

The SEIR provides revisions for clarification or amplification of information already in the record, focusing on modifications to the project, including the revised annexation plan (excluding the northern campus expansion area), the relocation of the District Transportation and Parking Facility (DTPF), adjustments to parking and student drop-

off areas, and updated phasing and scheduling. In no instances do the revisions provide substantial new information or indicate a new impact or increase in the severity of an impact identified in the FEIR or Draft SEIR.

In compliance with CEQA Guidelines Section 15090, prior to approving the modified project, the Lead Agency shall certify that:

- The SEIR has been completed in compliance with CEQA;
- The SEIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information contained in the SEIR and the FEIR prior to approving the modified project; and
- The SEIR reflects the Lead Agency's independent judgment and analysis.

## 2.0 COMMENTS AND RESPONSE TO COMMENTS

This section includes written comments received on the Draft SEIR and RSD's response to each comment received during the public review period. No verbal comments were received, as no public meeting was held during the public review period.

### 2.1 INTRODUCTION

The Draft SEIR was circulated for public review and comment during a 45-day public review period beginning on [start date] and ending on [end date] at [time]. The Draft SEIR was circulated to numerous agencies having jurisdiction over resources that could be affected by the modified project or having expertise or interest in environmental resources. A Notice of Completion was filed with the State Clearinghouse on [start date]. In addition, a Notice of Availability was published in the Ventura County Star (English and Spanish versions) and filed with the Ventura County Clerk on [start date].

No public meeting was held during the public review period for the Draft SEIR. The Rio School District (RSD) determined that written comments and agency consultations adequately facilitated public and agency input on the modified project, in accordance with CEQA Guidelines Section 15163(c).

Three comment letters were received during the public review period as identified in Table 2-1. Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft SEIR are excerpted in this document, the sections are shown indented. In accordance with CEQA Guidelines Section 15088, RSD evaluated comments on environmental issues received from persons who reviewed the Draft SEIR and prepared a written response to all comments received during the noticed comment period.

**Table 2-1** Comments Received on the Draft SEIR

| Comment Letter Number | Signatory                                                           | Date       |
|-----------------------|---------------------------------------------------------------------|------------|
|                       | <b>Agencies</b>                                                     |            |
| 1                     | City of Oxnard Community Development Department - Planning Division | 1/03/2025  |
| 2                     | California Department of Toxic Substances Control                   | 12/27/2024 |
| 3                     | Metropolitan Water District of Southern California                  | 01/06/2025 |

### 2.2 FORMAT OF RESPONSES TO COMMENTS

Responses to each of the comment letters are provided on the following pages. Each comment letter is provided an index number shown in the upper right corner of each letter. Individual comments/points within each letter are numbered in the right-hand margin of each letter. The RSD's responses to each comment letter immediately follow each letter and are referenced by the comment numbers in the margins of the comment letter.

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## 2.3 RESPONSES TO COMMENTS

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Letter 1

COMMUNITY DEVELOPMENT DEPARTMENT  
ADMINISTRATION  
214 SOUTH C STREET  
OXNARD, CALIFORNIA 93030



Friday, January 3, 2025

Dr. John Puglisi, Superintendent  
Rio School District  
1800 Solar Drive  
Oxnard, CA 93030

Subject: *City of Oxnard Comments on the Draft Supplemental Environmental Impact Report*

Project Name: *Rio Del Valle Middle School Existing Campus Expansion Master Plan, Northeast of Rose Avenue and Collins Street (APN 144-0-110-445; -225; & -590)*

Dear Dr. Puglisi:

The City of Oxnard (City) has received and conducted a review of the Draft Supplemental Environmental Impact Report (SEIR) for the proposed new Rio Del Valle Middle School Existing Campus Expansion Master Plan (Project). This letter provides the City's comments on the Draft SEIR.

The City has the following comments on the Draft SEIR.

### OVERALL COMMENT

1. In order for the City to be able to adequately review and determine the adequacy of the analysis provided in the Final and Supplemental EIRs, the review must be done concurrent with the review of the Annexation and all associated permits. Therefore additional comments may result from review of the formal application that may necessitate additional changes to the environmental documents. If that occurs, any additional changes must occur, to the satisfaction of the City, prior to the City taking action on any component of the Project.

### SECTION 2 DESCRIPTION OF PROPOSED REVISIONS

2. In Section 2.1 BACKGROUND there is a statement that reads "*The aging campus is facing several notable pressures and challenges, and the approved project seeks to expand the RDV campus ...*" There is no "approved project" via the City and the statement will read "Proposed Project covered by the FEIR" as used in other sections. All wording referencing "approved project" must be removed and replaced, unless referencing permits issued via the school district and in which case this shall be called out as such.

## 2.2 PROPOSED PROJECT COVERED BY THE FEIR

3. This section shall be revised to only describe the project covered by the Final EIR. The Modified Project Section must be revised to only discuss the changes to the original project. Currently, these discussions are intermingled, therefore it is unclear what the Modified Project is. Currently, there are discussions of changes or clarifications to the project identified under the "Proposed Project Covered By The FEIR" section that are not mentioned or included in the Modified Project section, such as the comment referencing the joint uses by the John F. Flynn Community Clinic and sheriff department *"This SEIR clarifies that expansion of these uses is not currently planned, and existing uses will benefit from the additional parking and other infrastructure improvements."*. However, this statement along with others are not mentioned in the Modified Project description.
4. The description of the "Proposed Project Covered By The FEIR" must be revised to include only the work/improvement covered by the Final EIR. As noted in prior comments the description continues to include work that was completed prior to the completion of the Final EIR, and was therefore completed without appropriate CEQA review or was not part of the project as it was the existing condition.
5. The Supplemental EIR fails to clarify and describe the existing use by the John F. Flynn Community Clinic and Sheriff's Department. The Supplemental EIR must be revised to include a discussion of the existing use of the site by the Clinic and Sheriff's Department, including but not limited to: the number of people associated with these uses, the frequency with which these entities use the site, hours of operation, a description of the activities occurring onsite, parking and traffic demand, etc. Lastly, no justification is provided to support the implication that the expanded parking areas will not result in an intensification of these uses, as the site is being expanded and therefore can accommodate a greater number of people.
6. There are a total of 219 parking spaces proposed for parking lot "A". The SEIR identifies the fields and parking is to accommodate the youth sports groups. Please confirm that the transportation analysis, and all other appropriate studies has adequately incorporated and analyzed impacts from these and other joint use activities. Currently, the traffic analysis, air quality analysis, or utility analysis does not address the impacts from these other proposed uses, therefore must be updated to address all existing and proposed uses.

## SECTION 3 SUPPLEMENT-MODIFIED PROJECT

7. This section must be revised to include discussion of off-site roadway infrastructure improvements to adjacent roadways, including but not limited to, Rose Avenue and Collins Street. These improvements are required to implement the proposed project and therefore must be discussed with the other required infrastructure and utility improvements. Also, the Modified Project requires improvements to the full width of Rose Avenue and Collins, therefore Figure 1 and the project description must be revised to accurately show proposed improvements. The analysis throughout the SEIR shall be

updated to appropriately account for construction and operational impacts associated with the required street improvements.

8. The Modified Project clarifies that the DTPF is only for bus parking and not for vehicle maintenance such as oil changes, and that no automotive maintenance projects such as motor and transmission oil, paint or fuel will be stored or disposed of at the project site, as all maintenance will occur offsite. However, this section fails to identify the intended purpose of the 11,000 square foot DTPF Building. The use of this building must be identified to adequately assess the potential impacts of the Modified Project. Also, the plans submitted by the District showing the floor plan for the DTPF (maintenance and operations) building shows a mechanics office and an approximately 2,000 square foot mechanics shop with vehicle and school bus lifts. The plans must be revised to reflect the inconsistency.

### 3.1 MODIFIED PROJECT PHASING

9. The phasing fails to identify the timing of the required roadway improvements on both Rose Avenue. The project requires improvement to the full width of both Rose Avenue and Collins Street, as part of the first phase. The Modified Project Phasing must be updated to include all required improvements.
10. All offsite improvements and improvements that may impact the public right of way must be completed as part of the Phase I. These include but are not limited to: Off-Site Sewer, Water, and Storm Drain improvements as required by the City of Oxnard, Landscape Improvements along Collins Street, Fire Access Land, and Bus Drop Off Area/Drop Off Lane.
11. The phasing is unclear as some items are duplicated in multiple phases. For Example "Off-Site Sewer, Water, and Storm Drain Improvements as required by the City of Oxnard" is listed in both Phase I-B and Phase II-B. Also, Phase I-B include "Landscape improvements along Rose Avenue & Collins Street Adjacent to Parking Lot A" but this overlaps with Phase II-A "Landscape Improvements along Collins Street". The phasing must be revised to clearly define the extent of each proposed phase. Lastly, this phasing must be revised to clarify the timing of landscape improvement along the remainder of Rose Avenue, or confirm Phase I-B includes all of the landscape improvements along Rose Avenue.
12. A phasing site plan must be included to show how each phase will function and appropriately mitigate impacts associated with each phase. The analysis throughout the SEIR must account for the proposed phasing. For example, adequate emergency access requires the construction of the Fire Access Road, however, that is currently proposed in Phase II-B. Therefore, as proposed the other phases could be completed before Phase II-B is started, potentially resulting in inadequate access.

### 5.2 AGRICULTURAL AND FOREST RESOURCES

13. This mitigation measure AG-2 is inconsistent with section 1 of the SEIR which states that the "The SEIR only includes the existing main campus and southern campus expansion

*areas in the annexation to the City of Oxnard. Since the northern campus expansion area will remain in agricultural use in perpetuity, its addition to the existing RDV campus is no longer considered part of the modified project.”* This is inconsistent with the mitigation measure as it only commits to a 10 year term. Again, as noted in the Final EIR comments, the Supplemental EIR again fails to appropriately mitigate the loss of the agricultural land. The proposed Mitigations (AG-1 and AG-2) does nothing to mitigate the physical loss of the over ten acres of agricultural land on the northern expansion portion.

14. The SEIR incorrectly states that the development of the southern expansion area would only result in the conversion of 8.7 acres of farmland. However, the entire southern expansion area is identified as either Prime Farmland or Farmland of Statewide Importance. Therefore, the entire property meets the definition of Agricultural Land per section 21060.1 of Chapter 2.5: Definitions under the California CEQA Guidelines. Additionally, locally the entire property is designated Agricultural and is covered by the Save Our Agricultural Resources Ordinance. Therefore, the entire 11.3 acre southern expansion area must be mitigated for. The SEIR must be revised to recognize the conversion of the 11.3 acres not 8.7 acres of agricultural land.
15. The addition of mitigation measure AG-3 is appreciated, however the mitigation fails to include the timing of the mitigation. The final fee amount shall be determined prior to any action on the proposed entitlements and the payment of the fee to the City of Oxnard shall be made prior to annexation of the project site (main campus and southern expansion area). Mitigation measure AG-3 must be revised to incorporate timing of the mitigation.

#### 5.11 LAND USE AND PLANNING

16. The analysis incorrectly states “The existing RDV campus (APNs 144-0-110-445, and 144-0-110-225) is located within the City’s Sphere of Influence and City Urban Restriction Boundary (CURB).” APN 114-0-110-225 is not located within the City’s Sphere of Influence and/or City Urban Restriction Boundary (CURB). The section must be revised to accurately reflect that only the Existing Main Campus is within the City’s Sphere of Influence and City Urban Restriction Boundary (CURB).

The City offers the following comments to the Rio del Valle Middle School Expansion Draft EIR Utilities and Traffic Analysis and Studies:

#### ENGINEERING COMMENTS

##### Water Resources

17. The proposed water allocation transfer of 25.911 AFY is not acceptable. This amount needs to account for the future 45% pumping reduction, and the amount needs to be closer to 47.11 AFY.
18. The conservation and irrigation improvements the Developer made in past years have nothing to do with the water transfer allocation since any accepted allocations by the City

will be reduced by 45% by 2040. Thus, the City would only be able to pump 14.25 AFY in 2040 to serve the project with the proposed transfer of 25.911 AFY. This would not be sufficient unless the Developer can obtain a verification letter from the Fox Canyon Groundwater Management Agency stating that the proposed transfer amount of 25.911 AFY will not be subjected to future pumping reductions.

#### Wastewater

19. Page 42—The SEIR needs to determine that while the immediate public sanitary sewer system is adequate to serve the project, an analysis must be conducted to assess the project impact on the trunk line downstream to ensure that the campus project does not reduce capacity reserved for other developable lands already within city limits discharging to the same sewer trunk.
20. Appendix B: The supplemental EIR needs to include the downstream sanitary sewer study in the appendix, along with any sewer monitoring required to complete the assessment and identify the necessary downstream improvements. A copy of the analysis was submitted separately before and needs to be included in the SEIR, along with the identified monitoring locations.

#### Hydrology

21. Page 28 – The SEIR states that the “design of the stormwater drainage features will be required to comply with the City’s 1 cfs/ac flow rate to prevent downstream flooding of the receiving waters and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems.” This statement is inaccurate as the stormwater analysis did not include an assessment of the tributary runoff to the existing storm drainage system, which the campus park is a part of.
22. Appendix B:
  - The analysis focuses on the campus expansion (phases 1, 2, and 3) with proposed detention without analyzing the collective impact on Lateral H. The report needs to analyze flow conveyance and detention from the perspective of the tributary draining to Lateral H between the intended design, existing condition, and proposed development.
  - The downstream auto center tract has a restricted flow rate of 1.1 cfs/ac up to the 100-year storm. How does the proposed detention facility meet or exceed this requirement when the design proposes discharging up to 1.54 cfs/ac for the 100-year storm?
  - Overflow: As currently proposed, more runoff will be directed to Lateral H and surcharge the headwall north of private properties. Explain how the overflow is directed to Collins Street and provide an exhibit demonstrating the concept.

Overall, what measures will the campus park project implement to reduce overflow downstream that could impact other private properties?

## TRANSPORTATION COMMENTS

### Annexation Proposal

23. Provide confirmation that the bus turnaround is sufficient for a bus to turn around. The size of the bus needs to be considered in the turning radius. The applicant shall demonstrate that the design is adequate to accommodate bus traffic on site, as to not impact adjacent public streets.
24. Lane configuration shown on Stantec Updated Traffic and Circulation Study page 7 is showing Rose & Walnut Dr lane configuration SB as 3 lanes, while there are only 2 lanes. If this error propagated through the analysis or report or has impacted analysis/results, it must be corrected throughout.
25. For better traffic operation at the ingress of the drop off location and for allowing longer storage for parking Lot A: allow only one lane to enter at the ingress to the drop off area (rather than 2 lanes), do not allow entry to the Parking Lot A area from the ingress point. Counting from the drop off lane, Label 3rd lane to guide drivers to parking Lot A, and allow only SB direction within the Parking Lot A.

### General Traffic Comments

26. Improvements of the off-site roadways and signalized intersections shall be considered in phase I of construction.
27. The applicant shall use the City's signal timing basic parameters for the timing sheet. This shall include the minimum greens that satisfy the bike min green. Walk/Don't walk times, Yellow intervals shall be calculated according to the CAMUTCD.
28. The applicant shall redesign the intersections of Rose Ave/Walnut Dr and Rose Ave/Collins's St per the City of Oxnard standards and provide a protected LT NB phase at Rose Ave/Walnut Dr. The applicant shall change ALL equipment at these two intersections to new equipment, since the majority of these equipment are nearing the end of their functional lifespan. This is to include, but not limited to: Poles, Mast arms, safety lighting, power cabinets, signal heads, pedestrian heads, push buttons (APS), signal cabinets, and ALL inside cabinet equipment such as signal controllers, switches, conflict monitors, battery backup, etc., the upgrade shall include new installation of video detection equipment and signal communication system to the Traffic Management Center.

29. Pedestrian crossing ramps shall meet the ADA standards at all crossings at all intersections that are part of the Safe Route to School. If these ramps do not meet ADA standards, the applicant shall redesign and reconstruct these ramps.
30. The applicant shall change the intersection of Auto Center Dr/Collins St (Via Estrada) to a signalized intersection in order to handle school buses as well as other traffic to and from school during peak hours. The design and construction of the signalized intersection and its equipment shall meet the City of Oxnard standards and specifications.
31. The applicant shall work with SCE to eliminate all conflict of power lines with traffic signal equipment and allow the installation of safety lights on signal poles at all intersections, as well remove all wires obscuring the traffic signal indicators.
32. The applicant shall prevent entrance from the SB into the drop off ingress by building raised median.
33. The School shall be responsible for managing the drop off area at all times.
34. Pedestrian crossing at the north leg of the intersection of Rose Ave / Walnut Dr. and at Rose Ave/Collins shall be perpendicular to the curb line to minimize students' crossing distance. The pedestrian crossing shall lead to the student walkway to the school buildings. This needs to be better clarified on the conceptual plan.
35. The applicant shall provide a sidewalk along the westerly side of Rose Ave, between Auto Center Drive and Collins St. The design of the sidewalk and its integration with Rose Ave shall meet City of Oxnard standards on major arterials.

Thank you for the opportunity to comment on the SEIR. Please call Joe Pearson II, Planning & Environmental Services Manager, at 805-385-8272, or you can email at [Joe.Pearson@oxnard.org](mailto:Joe.Pearson@oxnard.org) if you have any questions.

Sincerely,



Joe Pearson, II  
Planning & Environmental Services Manager  
City of Oxnard

cc: Ashley Golden, Assistant City Manager (via email)  
Jeff Pengilley, Community Development Director (via email)  
Amanda Daams, Best, Best & Krieger (via email)  
Tai Chau, Supervising Civil Engineer (via email)  
Kenneth Rozell, Chief Assistant City Attorney (via email)

|          |                                                                                                             |
|----------|-------------------------------------------------------------------------------------------------------------|
| Letter 1 | Joe Pearson, Planning and Environmental Services Manager<br>City of Oxnard Community Development Department |
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### Response to Comment 1-1

The Rio School District (RSD) anticipates certifying the Final SEIR during the Board Meeting scheduled for June 25, 2025. To ensure a comprehensive and efficient review process, we propose the following:

**CEQA Compliance:** All issues related to environmental impacts have been thoroughly addressed within the scope of the EIR, including the FEIR as modified by the SEIR, as mandated by CEQA and the City CEQA Guidelines. This will ensure that all potential environmental concerns are evaluated and mitigated appropriately for local planning jurisdictions and the State of California.

**Development Application:** Any issues that fall outside the realm of environmental impacts, such as those additional conditions that may be imposed related to the annexation and associated permits, will be addressed separately within the development application process. This will allow for a focused and detailed review of these aspects in accordance with the City's requirements. The RSD acknowledges that the City may have additional conditions imposed as part of the annexation process that are not environmental impacts but nonetheless have a nexus to the proposed annexation and will remain conditions of the City's agreement to annex the Main Campus and Southern Campus Expansion Areas into the City. Where the City's comments do not present environmental impact issues, but potential annexation conditions, RSD has noted that such comments have been addressed in the RSD's response to the City's DAC comments. This approach will facilitate a clear and effective review process, ensuring that both CEQA obligations and City CEQA guidelines are satisfactorily met.

### Response to Comment 1-2

To address this comment, the following revisions have been made to the SEIR:

- The statement was updated to read: "The aging campus is facing several notable pressures and challenges, and the proposed project covered by the FEIR seeks to expand the RDV campus ..."
- All references to "approved project" have been removed and replaced with "proposed project as set forth by the FEIR," unless specifically referencing specific permits issued by the City and/or other agencies, including the State or County. In such cases, the SEIR will clearly indicate the agencies approving such permits. The Final SEIR accurately describes the proposed project.

### Response to Comment 1-3

To address the comment, the following revisions have been made:

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**Project Description:** This section was revised to exclusively describe the project covered by the FEIR. This will ensure that the original project details are clearly presented without any intermingling with modifications.

**Modified Project Section:** This section was revised to solely discuss the changes to the original project, ensuring that all modifications, clarifications, and updates have been clearly outlined in this section.

**Consistency in Descriptions:** All changes or clarifications mentioned in the "Proposed Project Covered by the FEIR" section, such as the joint uses by the John F. Flynn Community Clinic and the Sheriff's Department, are also included in the Modified Project section. This includes statements like, "This SEIR clarifies that expansion of these uses is not currently planned, and existing uses will benefit from the additional parking and other infrastructure improvements."

The Final SEIR provides a clear and accurate description of both the original and modified projects.

#### **Response to Comment 1-4**

To address this comment, the following revisions have been made to the SEIR:

**Project Description Revision:** The description of the "Proposed Project Covered by the FEIR" has been revised to include only the work and improvements covered by the FEIR. This will ensure that the project description accurately reflects the scope of work that underwent CEQA review in the FEIR.

**Exclusion of Prior Work:** All references to work that was completed prior to the completion of the FEIR have been removed. This will ensure that the SEIR accurately distinguishes between the existing conditions and the proposed project.

#### **Response to Comment 1-5**

To address this comment, the following revisions have been made to the SEIR:

**Existing Use Description:** Please review the additional information included in Appendix D (and called out in text), including the Joint Use Agreement for the Construction and Operation of the Rio Del Valle Junior High School Gymnasium. The SEIR has been revised to include a more detailed discussion of the existing use of the Site by the John F. Flynn Community Clinic and the Sheriff's Department.

This will cover:

- The estimated average number of people associated with these uses.
  - John F. Flynn Community Clinic serves as a pediatric well child clinic with the expectation of providing services to 18 to 20 patients per day. The patients would be spread relatively evenly throughout the day.
- The estimated frequency with which these entities use the Site.

- The Sheriff's Department has access to the facility on an as-needed basis. Historically, a few times a month with one or two sheriff vehicles, unless needed for an emergency use.
- John F. Flynn Community Clinic provides services to patients three days a week and also provides pediatric patients vaccines (nurse only visits) offered on the other two days of the week.
- Hours of operation/availability.
  - John F. Flynn Community Clinic is open 8 am - 5 pm Monday through Friday.
- A description of likely activities occurring onsite: Medical care and training.
- Anticipated parking and traffic demand. Minimal. See Transportation Section of SEIR.

Traffic counts were collected on two roadway segments and nine intersections, of which two intersections accommodate the school's existing ingress and egress driveways. The roadway and intersection traffic counts captured all trips generated by the existing school site, including trips generated by school activity and trips generated by community (joint) use of school facilities, (John F. Flynn Community Clinic use, Sheriff's Department use and youth sports groups gym and field use).

Justification for Expanded Parking: RSD has provided an expanded justification to clarify that the new parking areas are intended to support the existing uses, including sporting events. The additional parking and infrastructure improvements have been designed to enhance the current operations and safety including easy access for emergency vehicles without significantly increasing the number of people or activities onsite.

### **Response to Comment 1-6**

To address this comment, the following revisions have been made to the SEIR:

Traffic counts were collected on two roadway segments and nine intersections, of which two intersections accommodate the school's existing ingress and egress driveways. The roadway and intersection traffic counts captured all trips generated by the existing school site, including trips generated by school activity and trips generated by community (joint) use of school facilities, (John F. Flynn Community Clinic use, Sheriff's Department use and youth sports groups gym and field use).

Parking Lot "A" has a total of 150 parking spaces (Figure 1). We're not sure how the City came up with a total of 219 parking spaces for Parking Lot "A".

**Confirmation of Analysis:** The SEIR has been revised to adequately incorporate and analyze the potential for impacts from the youth sports groups and other joint use activities. The SEIR traffic analysis, air quality analysis, and utility analysis has addressed the impacts from all

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existing and proposed uses. See the Final SEIR for an assessment of the parking demand, traffic flow, air quality implications, and utility requirements associated with the expanded parking areas and joint use activities.

### **Response to Comment 1-7**

To address this comment, the following revisions have been made to the SEIR:

**Discussion of Off-Site Roadway Improvements:** The SEIR has been revised to include a discussion of the required off-site roadway infrastructure improvements required for the proposed project, related to CEQA impacts and specific-related nexus. This specifically cover improvements to adjacent roadways, including but not limited to Rose Avenue and Collins Street that are included as mitigation for impacts to traffic identified under CEQA.

The RSD will complete the following items during Phase I as shown in Figure 2:

- Curbs;
- Gutters;
- Sidewalks;
- Bike Lanes;
- Entire Parking Plan;
- Upgrade on Traffic Signal at Egress to RDV; and
- Pro Rata share of Traffic Signal at Collins Street (estimated to be 10 percent use of this intersection).

Negotiations regarding specific off-site roadway improvements to be made at the request of the City, are ongoing with the City. Any improvements that are not directly related to environmental impacts and/or included as mitigation measures will be addressed within the DAC process. A meet and confer process with the City will ensure that all relevant issues are appropriately reviewed and resolved.

**Revisions to Project Description and Figures:** The project description and Figure 1 (Project Site Plan) has been revised to accurately reflect the proposed improvements. This will ensure that all necessary infrastructure and utility improvements have been clearly depicted.

**Updated Analysis:** The analysis throughout the SEIR has been updated to appropriately account for the construction and operational impacts associated with any required street improvements. This has included evaluation of the potential impacts on traffic, air quality, noise, and utilities.

### **Response to Comment 1-8**

To address this comment, the following revisions have been made to the SEIR:

Clarification of DTPF Building Use: The SEIR site plan (Figure 1) has been revised and the SEIR has clearly identified the intended purpose of the DTPF building. This building is intended for administrative and operational purposes, including offices, storage, and support spaces. Specifically, the DTPF building includes:

- Administrative offices;
- Storage areas; and
- Support spaces for operational activities.

As previously stated, no vehicle maintenance activities such as oil changes, or storage and disposal of automotive materials, will occur onsite. All maintenance will be conducted offsite.

**Reference to Plans:** Refer to the submitted plans in DAC, which provide detailed floor plans and descriptions of the uses within the DTPF building. These plans have been updated to ensure consistency with the stated purpose and to remove any references to vehicle maintenance activities.

#### **Response to Comment 1-9**

To address this comment, the following revisions have been made to the SEIR:

**Inclusion of Roadway Improvements in Phasing:** The SEIR has been revised to clearly identify the timing of the required roadway improvements on both Rose Avenue and Collins Street. These improvements will be included as part of the first phase of the project. This will ensure that the project phasing accurately reflects all required improvements and their associated timelines.

**Updated Project Phasing:** The Modified Project Phasing has been updated to include all required improvements to both Rose Avenue and Collins Street. This will ensure that the SEIR has provided a comprehensive and accurate depiction of the project's phasing and the necessary infrastructure improvements. A new figure (Figure 2) showing the phasing plan has been added to the Final SEIR.

Additionally, negotiations regarding which specific improvements will be made are ongoing with the City. Any improvements that are not directly related to environmental impacts and included as mitigation measures should be addressed within the DAC process. This approach will ensure that all relevant issues are appropriately reviewed and resolved in accordance with the City's requirements.

#### **Response to Comment 1-10**

To address this comment, the following revisions have been made to the SEIR:

**Inclusion of Off-Site Improvements in Phase I:** Per the Settlement Agreement, the SEIR has been revised to clearly state that all off-site improvements and improvements impacting the public right of way, except for specific storm water treatment improvements tied to later phases, will be

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completed as part of Phase I (including Phase I-B). These improvements include, but are not limited to:

- Off-Site Sewer improvements;
- Water improvements;
- Storm Drain improvements as required by the City (initial infrastructure installation);
- Landscape Improvements along Collins Street;
- Fire Access Land; and
- Bus Drop Off Area/Drop Off Lane.

**Clarification on Storm Water Treatment Improvements:** As negotiated in the Settlement Agreement, storm water treatment improvements associated with specific project components, such as the District Vehicle/Bus Parking, are scheduled for Phase II-A. The SEIR has been updated to clearly distinguish between the initial storm drain infrastructure installation (included in Phase I-B) and the storm water treatment improvements deferred to Phase II-A, ensuring alignment with the Settlement Agreement terms.

**Updated Project Phasing:** The Modified Project Phasing has been updated to reflect that Phase I (including Phase I-B) encompasses all required off-site improvements and public right-of-way improvements, except for the noted storm water treatment improvements in Phase II-A. This has provided a comprehensive and accurate depiction of the proposed Project's phasing and infrastructure improvements.

**Ongoing Negotiations:** Negotiations with the City of Oxnard regarding the specific scope of improvements are ongoing. Any improvements not directly related to environmental impacts or included as mitigation measures will be addressed through the DAC process, ensuring compliance with the City's requirements and appropriate review of all relevant issues.

#### **Response to Comment 1-11**

To address this comment, the following revisions have been made to the SEIR:

**Clarification of Phasing for Off-Site Sewer, Water, and Storm Drain Improvements:** The listing of "Off-Site Sewer, Water, and Storm Drain Improvements as required by the City of Oxnard" in both Phase I-B and Phase II-B has caused confusion. To clarify, Phase I-B will include the installation of off-site sewer, water, and storm drain infrastructure as required by the City. The reference in Phase II-B was intended to address storm drain treatment improvements associated with later project components, as negotiated in the Settlement Agreement. The SEIR explicitly states that Phase I-B covers the initial storm drain infrastructure installation, while storm drain treatment improvements will occur in Phase II-A and Phase II-B, as applicable, to align with the Settlement Agreement terms.

**Landscape Improvements Along Rose Avenue and Collins Street:** To provide clarity:

- Phase I-B has included all landscape improvements along Rose Avenue and Collins Street adjacent to Parking Lot A.
- Phase II-A has addressed additional landscape improvements along Collins Street, excluding areas adjacent to Parking Lot A.

**Timing of Landscape Improvements Along Rose Avenue:** All landscape improvements along Rose Avenue will be completed in Phase I-B to ensure a cohesive and timely implementation.

The SEIR phasing plan has been revised to clearly define the extent and timing of each phase, eliminate duplications, and reflect the negotiated purpose of storm drain treatment improvements in Phase II-A and Phase II-B as outlined in the Settlement Agreement. These updates have ensured the phasing is transparent and consistent with project requirements and agreements. A new figure (Figure 2) showing the phasing plan has been added to the Final SEIR.

### **Response to Comment 1-12**

To address this comment, the following revisions have been made to the SEIR:

**Inclusion of a Phasing Site Plan:** A comprehensive phasing site plan has been incorporated into the Final SEIR to provide a clear visual representation of the project's progression. This plan has ensured that each phase is appropriately sequenced and that impacts are mitigated effectively. A new figure (Figure 2) showing the phasing site plan has been added to the Final SEIR.

**Analysis of Phasing in the SEIR:** The analysis throughout the SEIR has been revised to account for the proposed phasing. This included an examination of how each phase will address potential impacts and ensure compliance with CEQA requirements.

**Emergency Access and Fire Access Road:** This ensures that the project phases are clearly defined, impacts are mitigated appropriately, and emergency access is maintained at all times. To address this issue:

- The phasing plan has been revised to ensure that the Fire Access Road is constructed earlier in the project timeline, specifically in Phase I-B. This adjustment will guarantee that adequate emergency access is available throughout all phases of the project.
- The SEIR has been updated to reflect this change and to analyze the impacts of providing emergency access in Phase I-B.

### **Response to Comment 1-13**

To address this comment, the following revisions have been made to the SEIR:

**Inconsistency with Section 1 of the SEIR:** The SEIR correctly states that the northern campus expansion area is not part of the proposed Project and will remain in agricultural use. As this area is

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not part of the proposed Project, Mitigation Measure AG-2 has been removed from the SEIR. With the removal of Mitigation Measure AG-2, there is no inconsistency with Section 1 of the SEIR.

**Mitigation of Agricultural Land Loss:** Since the northern campus expansion area is no longer part of the proposed Project, the mitigation measures related to this area are no longer applicable. Therefore, Mitigation Measure AG-2 has been removed from the SEIR.

These revisions have been reflected in the Final SEIR to ensure that the mitigation measures are consistent with the proposed Project's scope and goals.

#### **Response to Comment 1-14**

To address the comment, the following revisions have been made to the SEIR:

**Clarification of Farmland Conversion:** The SEIR has been revised to state that the development of the southern campus expansion area will result in impacts to 11.3 acres of farmland. This revision has ensured that the SEIR accurately reflects the extent of farmland conversion and complies with both state and local regulations. Please note that of the 11.3 acres approximately 2.4 acres have been used as a residence, swimming pool, parking area, and a storage area.

**Local Designation and SOAR Ordinance:** The entire property is designated as Agricultural and is covered by the Save Our Agricultural Resources (SOAR) Ordinance. This ordinance has emphasized the importance of preserving agricultural land within the region.

**Mitigation Measures:** The revised SEIR has included available and appropriate mitigation measures to address the conversion of the full 11.3 acres of agricultural land. These measures are designed to minimize the impact on agricultural resources and comply with CEQA requirements.

#### **Response to Comment 1-15**

To address this comment, the following revisions have been made to the SEIR:

**Inclusion of Timing for Mitigation Measure AG-2:** The SEIR has been revised to specify that the final fee amount shall be determined and the payment of the fee to the City shall be made prior to the annexation of the main campus and southern campus expansion areas. This ensures that the mitigation is implemented in a timely manner and in accordance with CEQA guidelines.

**Renumbering and Revision of Mitigation Measure AG-2:** Mitigation Measure AG-3 has been renumbered as AG-2 since AG-2 in the FEIR has been removed since the northern campus expansion area is no longer part of the proposed Project.

Mitigation Measure AG-2 has been revised to include the timing of the mitigation as follows:

**AG-2:** The District shall pay an agricultural conservation in-lieu fee to the City of Oxnard. The final fee amount shall be determined by the RSD and the City of Oxnard. 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. The final fee amount shall be determined and the payment of the fee to the City of Oxnard shall be made prior to annexation of the proposed Project site (main campus and southern campus expansion areas).

These revisions have been reflected in the Final SEIR to ensure that the mitigation measures are clear, enforceable, and effective.

#### **Response to Comment 1-16**

Upon review, it has been confirmed that APN 144-0-110-225 is not located within the City's Sphere of Influence and/or City Urban Restriction Boundary (CURB).

**Revision of SEIR:** The SEIR has been revised to accurately reflect that only the Existing Main Campus (APN 144-0-110-445) is within the City's Sphere of Influence and City Urban Restriction Boundary (CURB). The section has been updated to ensure that the information is correct and consistent with the City's planning boundaries.

These revisions have been reflected in the Final SEIR to ensure that the document accurately has represented the project's context and complies with CEQA guidelines.

#### **Response to Comment 1-17**

What has been proposed by RSD is already a 45% reduction from historical pumping and the City is asking for an additional 45% reduction on top of that. Water allocation discussions are ongoing and the 45% reduction was not substantiated by Fox Canyon Groundwater Management Agency (FCGMA) and is a City stance that warrants further discussion. The RSD will be continuing conversations with the City regarding the proposed water allocation transfer issue.

#### **Response to Comment 1-18**

What has been proposed by RSD is already a 45% reduction from historical pumping and the City is asking for an additional 45% reduction on top of that. Per the February 4, 2025 letter provided by Arne Anselm (FCGMA), there is no FCGMA requirement for reduction that substantiates the 45% reduction the City has cited. The letter explains that the City will be required to comply with the Sustainable Groundwater Management Act by ensuring the basins are sustainably managed by 2040, but this can happen in a number of ways and does not correlate to a 45% reduction of allocated water to every property throughout the basin. This reduction request by the City requires further discussion to determine a justifiable allocation.

#### **Response to Comment 1-19**

The RSD is in the process of pulling an encroachment permit with the City to install monitoring equipment within Rice Avenue. This monitoring will be completed per the May 30, 2024 letter provided by Tai Chau. The monitoring results and previously provided sewer build out calculations and exhibit will assist the City in determination of future impact to the public sanitary sewer.

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**Response to Comment 1-20**

Sewer monitoring is scheduled to begin May 6, 2025 and run for two weeks. Once our analysis is available, it will be submitted to the City for review. Additionally, the Downstream Sewer Analysis Report dated December 1, 2023 and prepared by Jensen at the request of the City will be attached as an attachment to the Final SEIR.

**Response to Comment 1-21**

Per the March 6, 2025 meeting with Tai Chau, the proposed Project will provide sufficient detention in order to mitigate the 10-, 50-, and 100-year post-development peak runoff to the 10-year pre-development condition. This reduction is beyond any standard requirements in the City of Oxnard but will be done by the RSD to help improve an existing City deficiency for which the RSD is not responsible.

**Response to Comment 1-22**

See our response to comment #21, the proposed Project will provide detention to mitigate post-development peak runoff of all storms up to the 100-year back down to the 10-year pre-development condition. This is in excess of normal requirements in the City of Oxnard in order to reduce previously allowed impacts to lateral H that were not associated with the RSD.

The existing built-out campus was included within the design of the Auto Center Tract storm drain system. As such, it was never intended for the proposed Project site to provide detention beyond the existing peak runoff, so the 1.1 cfs/ac unit runoff would not apply. As noted in our previous response to comments #21 and #22, the RSD is providing detention beyond standard City requirements and per the updated hydrology letter, the unit runoff of all storms up to the 100-year will be reduced to 0.70 cfs/ac.

This project does not propose directing additional runoff to Lateral H. It was proposed to reduce the peak runoff to predevelopment conditions for which Lateral H and the Auto Center storm drain system were designed to accommodate. Due to improvements completed by others, Lateral H currently accepts flow above what was shown in its original design report. In order to assist the City in this issue, the RSD will be providing detention beyond City standard requirements as noted in previous response to comments #21 and #22.

**Response to Comment 1-23**

The on-site civil engineering design has incorporated a school bus turning analysis using Autoturn software to determine the bus turnaround dimensions and confirmed the bus turnaround was sufficient.

**Response to Comment 1-24**

Exhibit 3 (Page 7) depicts a separate southbound right-turn lane (3 lanes) at the Rose Avenue/Walnut Drive intersection in error. The analysis and resulting operational findings assume a

shared through/right-turn lane (2 lanes), which is correct. No corrections to the Updated Traffic and Circulation Study are required.

**Response to Comment 1-25**

The most recent site plan (Figure 1) has incorporated these suggested changes to Parking Lot A.

**Response to Comment 1-26**

Comment noted. A new figure (Figure 2) showing the phasing plan has been added to the Final SEIR. This comment appears to be a DAC comment and not a CEQA comment.

**Response to Comment 1-27**

The signal calculation worksheets, which have been provided to City staff, have incorporated the City's signal timing basic parameters.

**Response to Comment 1-28**

The traffic study indicated that the proposed Project would not generate an impact at the Rose Avenue/Walnut Drive and Rose Avenue/Collins Street intersections based on CEQA criteria (XVII. Transportation a. through d.). Please refer to RSD's response to comments to the City's DAC comments.

**Response to Comment 1-29**

This comment does not appear to be related to CEQA criteria (XVII. Transportation a. through d.). Please refer to RSD's response to comments to the City's DAC comments.

**Response to Comment 1-30**

The intersection currently operates in the LOS D range without the proposed Project. The proposed Project, along with other pending and approved (cumulative) developments would add trips to this intersection. The intersection does not meet CAMUTCD signal warrant criteria. Stopping sight distance criteria at the stopped approach (300' at 40 MPH posted speed limit) are satisfied in both directions. RSD doesn't believe that the Auto Center Drive/Collins Street intersection requires a signal. City staff previously provided the following comment regarding this intersection on February 23, 2024: "To ensure safety, the project shall at a minimum propose restrictions of left turns out of Collins at this intersection by installing a compatible raised median and the necessary signage."

**Response to Comment 1-31**

All power lines and communication cables will be undergrounded along the school boundary. Therefore, any crossing lines and cables will also be undergrounded.

**Response to Comment 1-32**

A raised median is shown on the Project Site Plan (Figure 1) and turning restrictions have been incorporated in the traffic study.

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**Response to Comment 1-33**

Comment noted by RSD.

**Response to Comment 1-34**

This comment does not appear to be related to CEQA criteria (XVII. Transportation a. through d.). Please refer to RSD's response to comments to the City's DAC comments.

**Response to Comment 1-35**

This comment does not appear to be related to CEQA criteria (XVII. Transportation a. through d.). Please refer to RSD's response to comments to the City's DAC comments.

DRAFT

Letter 2



**Yana Garcia**  
Secretary for  
Environmental Protection



**Department of Toxic Substances Control**

Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200  
[dtsc.ca.gov](http://dtsc.ca.gov)



**Gavin Newsom**  
Governor

**SENT VIA ELECTRONIC MAIL**

December 27, 2024

Dr. John Puglisi  
Superintendent  
Rio School District  
1800 Solar Drive  
Oxnard, CA 93030  
[jpuglisi@rioschools.org](mailto:jpuglisi@rioschools.org)

RE: SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE RIO DEL VALLE MIDDLE SCHOOL EXISTING CAMPUS EXPANSION MASTER PLAN DATED NOVEMBER 20, 2024, STATE CLEARINGHOUSE NUMBER [2022060117](#)

Dear Dr. John Puglisi,

The Department of Toxic Substances Control (DTSC) has received the Supplement Environmental Impact Report (SEIR) for the Rio Del Valle Middle School (RDVMS) Existing Campus Expansion Master Plan (Project). The Project includes the expansion of the RDVMS campus located at 3100 Rose Avenue in unincorporated County of Ventura. The existing campus is approximately 30.2 acres, including the 20.2-acre main campus (APN 144-0-110-445) and 10 acres of active agricultural lands (a portion of APN 144-0-110-225) to the north of the main campus buildings. The proposed Project would add approximately 11.3-acres to the south (a portion of APN 144-0-110-590) that the Rio School District (RSD) proposes to develop with new educational and support facilities, resulting in an approximately 41.5-acre campus (Project Site).

The proposed modified Project includes development within the expanded campus which would occur in phases and would include options for: new classrooms, library and media center, multi-purposed building, student transportation and parking facilities,

student bus turnout, recreational facilities including two basketball courts, baseball field, softball field, a "flex" multi-sport playfield, which can be configured into a soccer field and or a baseball field as needed, four sand volleyball courts, an athletic restroom/storage building, and up to ten tennis courts and/or pickleball courts. The buildout of the RDVMS Existing Campus Expansion Master Plan is anticipated to occur over approximately five years.

On May 25, 2022, RSD entered into an [Environmental Oversight Agreement \(EOA\) \(Docket No. HAS-FY21/22-135\)](#) with DTSC for oversight of an environmental investigation for the 11.1-acre portion of the Project Site. RSD conducted a Preliminary Endangerment Assessment (PEA) Equivalent Report (Phase I Environmental Site Assessment, Tetra Tech, September 23, 2021, and Phase II Environmental Site Assessment, Tetra Tech, September 24, 2021), and a Supplemental Site Investigation (SSI) (Tetra Tech, September 26, 2022), to evaluate and investigate an 11.1-acre portion of Assessor's Parcel No. (APN) 144-0110-590. The SSI concluded that the Site soil is impacted with organochlorine pesticides (OCPs) and total petroleum hydrocarbons (TPHs) and recommended step out sampling to assess the lateral extent of contamination. On October 27, 2022, DTSC concurred with this conclusion and recommendation and approved the SSI. On June 22, 2023, DTSC approved a Technical Memorandum Housekeeping Action Plan (Tetra Tech, June 12, 2023) for further investigating the Site. As of today, this proposed work has not been completed. On December 20, 2024, Tetra Tech notified DTSC that the sampling activities would be conducted during the week of January 6-10, 2025, and the final report will be available by the middle of March 2025. DTSC has the following comments:

1. On June 22, 2022, DTSC provided [comments](#) on the Notice of Preparation of an Environmental Impact Report and Initial Study. RSD partially addressed DTSC's comments, but DTSC has not yet received the final report.
2. Section 9, Hazards Hazardous Materials of the SEIR states, "As documented in the FEIR, impacts related to hazards and hazardous materials related to the proposed Project covered by the FEIR would remain less than significant with implementation of mitigation measures HAZ-1, HAZ-2, and HAZ-3." As of date, the implementation of mitigation measures is not completed.

Dr. John Puglisi  
December 27, 2024  
Page 3

3. If the Project requires import soil to backfill the areas excavated, DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).
4. DTSC recommends RSD to discuss the procedures that will be taken if the soil and/or groundwater contamination is suspected or discovered during grading, construction and/or demolition.

The SEIR states that the proposed Project would add approximately 11.3-acres to the south (a portion of APN 144-0-110-590) that RSD proposes to develop with new educational and support facilities, resulting in an approximately 41.5-acre Project Site. If this area is different than the May 25, 2022 executed EOA, DTSC has the following comments:

- 5 The SEIR should identify and determine whether current or historic uses at the Project Site may have resulted in any release of hazardous wastes/substances. Historic operations of the 11.3-acre Site are not mentioned in the SEIR and, a Phase I Environmental Site Assessment is necessary to identify any recognized environmental conditions. If state funding is anticipated, then DTSC review/approval is required pursuant to California Education Code. For school Projects that do not require state funding, DTSC recommends environmental review under the DTSC school program oversight to ensure the school is safe for students and staff.

- 6 Section 5.9, Hazards and Hazardous Materials of the SEIR states, "The modified Project would be required to comply with the applicable state and local requirements, including, but not limited to, the DTSC, CDE, FAR, Caltrans, County of Ventura Department of Airports (DOA), Ventura County, and the City of Oxnard, and would be required to implement, recommendations of the Site-specific PEA Equivalent Report, SSI Report, and associated DTSC approval letters, and existing mitigation can be applied to the SEIR phasing. For these reasons, the modified Project's contribution to hazards and hazardous materials continues to be less than significant." DTSC has not provided oversight for any environmental investigations at this 11.3-acre area of the Project.
- 7 If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).
- 8 Section 5.2, Agriculture and Forest Resources states, "The District-certified Project would convert important farmland in the southern campus expansion area to non-agricultural use." If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides.
- 9 If there are any recognized environmental conditions in the Project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
- 10 If soil contamination is suspected or observed in the Project area, DTSC

Dr. John Puglisi  
December 27, 2024  
Page 5

recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#).

Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

11

If during construction/demolition of the Project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the SEIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

DTSC appreciates the opportunity to comment on the SEIR for the RDVMS Existing Campus Expansion Master Plan. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

*Tamara Purvis*

Tamara Purvis  
Associate Environmental Planner  
HWMP - Permitting Division – CEQA Unit  
Department of Toxic Substances Control  
[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)

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|-----------------|-------------------------------------------------------------------------------------------------------------------|
| <b>Letter 2</b> | <b>Tamara Purvis, Associate Environmental Planner</b><br><b>California Department of Toxic Substances Control</b> |
|-----------------|-------------------------------------------------------------------------------------------------------------------|

### **Response to Comment 2-1**

The RSD acknowledges that the sampling activities scheduled for January 6–10, 2025, as notified by Tetra Tech on December 20, 2024, have been completed. The final report is expected by August 2025. The Final SEIR incorporates findings from this report and fully address DTSC’s 2022 NOP comments. The RSD will provide DTSC with the final report upon completion for review and approval.

### **Response to Comment 2-2**

The District confirms that Mitigation Measures HAZ-1 and HAZ-2 remain applicable and will be implemented as part of the Project’s phased development. The northern campus expansion area (10 acres, portion of APN 144-0-110-225) is excluded from the modified project and remains in agricultural use in perpetuity, eliminating the need for Mitigation Measure HAZ-3. The Final SEIR and Mitigation Monitoring and Reporting Program (MMRP) includes an updated status of these mitigation measures, detailing their implementation timeline and compliance with DTSC oversight, to ensure impacts remain less than significant.

### **Response to Comment 2-3**

The RSD agrees to test all imported soil and fill material for contaminants of concern, document the origins of the material, and ensure suitability for the intended land use. The Final SEIR includes a commitment to follow DTSC’s guidance, including soil sampling based on the source and prior land use, with results submitted to DTSC for review.

### **Response to Comment 2-4**

The Final SEIR includes a detailed protocol specifying that construction will cease in areas where contamination is suspected, followed by implementation of health and safety procedures. The RSD will coordinate with DTSC and other regulatory agencies to conduct investigations, sampling, and remediation as needed, with oversight from the appropriate agency.

### **Response to Comment 2-5**

The RSD clarifies that the 11.3-acre area is part of the 11.1-acre portion covered by the Environmental Oversight Agreement (EOA, Docket No. HAS-FY21/22-135) with DTSC, with a slight discrepancy in acreage due to updated surveys. To address DTSC’s concern, the Final SEIR includes a discussion of current and historic uses of the 11.3-acre area, referencing the Phase I ESA (Tetra Tech, September 23, 2021) and Supplemental Site Investigation (SSI, Tetra Tech, September 26, 2022). If additional investigation is required, the RSD will conduct this work under DTSC oversight.

**Response to Comment 2-6**

As clarified in Response DTSC-5, this area is included in the EOA, and investigations (Phase I, Phase II, and SSI) have been conducted under DTSC's oversight. The Final SEIR clearly documents DTSC's role and reference the EOA, PEA Equivalent Report, SSI Report, and DTSC approval letters (e.g., October 27, 2022, and June 22, 2023). The RSD welcomes continued DTSC oversight to ensure compliance and safety.

**Response to Comment 2-7**

The proposed Project does not currently involve demolition of buildings on the 11.3-acre southern expansion area, as it is primarily agricultural land. However, the Final SEIR includes a commitment to conduct such surveys if demolition is proposed in future phases, with removal and disposal complying with California regulations and DTSC guidance.

**Response to Comment 2-8**

The SSI (Tetra Tech, September 26, 2022) identified organochlorine pesticides (OCPs) in the 11.1-acre portion, and additional soil sampling was conducted in January 2025 under DTSC oversight to further assess the extent of soil impacted with OCPs at concentrations above screening levels. The Final SEIR incorporates these findings and outline mitigation measures to address residual pesticides, ensuring protection of human health and the environment, with DTSC oversight.

**Response to Comment 2-9**

The RSD confirms that the ongoing environmental investigations (per the EOA and January 2025 sampling) are addressing these recognized environmental conditions. The Final SEIR summarizes the results and detail remedial actions, if required, with regulatory oversight by DTSC.

**Response to Comment 2-10**

As addressed in Response DTSC-3, the RSD will test and document imported soil per DTSC's guidance, with results submitted to DTSC for review.

**Response to Comment 2-11**

As addressed in Response DTSC-4, the Final SEIR includes a protocol for ceasing work, implementing health and safety measures, and coordinating with DTSC for investigation and remediation, ensuring adequate regulatory oversight.



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

**Letter 3**

January 6, 2025

Via Email

Dr. John Puglisi, Ph.D.  
Superintendent  
Rio School District  
1800 Solar Drive  
Oxnard, CA 93030

Dear Dr. Puglisi:

Notice of Availability of a Draft Supplemental Environmental Impact Report for the  
Rio Del Valle Middle School Existing Campus Expansion Master Plan (SCH No. 2022060117)

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Availability of a Draft Supplemental Environmental Impact Report (Draft SEIR) for the Rio Del Valle Middle School Existing Campus Expansion Master Plan Project (Project). The Rio School District is acting as the Lead Agency under the California Environmental Quality Act for this Project. The Project consists of expanding the existing Rio Del Valle Middle School, approximately 11.3 acres with new educational and support facilities (e.g., classrooms, library and media center, multi-purpose building, student transportation and parking facilities, student bus turnout, athletic restroom/storage building, recreational facilities), resulting in an approximately 41.5-acre campus. The Project also requires discretionary approvals for zone changes, general plan amendments, annexations, and other approvals. This letter contains Metropolitan's response to the Public Notice as an affected public agency.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26-member public agencies serving approximately 19 million people in portions of six counties in Southern California. Metropolitan's mission is to provide its 5,200 square miles service area with adequate and reliable supplies of safe, high-quality drinking water to meet present and future needs in an environmentally and economically responsible way.

Metropolitan reviewed the project description of the proposed Project and determined that the proposed Project is partially within Metropolitan's service area. The existing Del Rio Campus is located within Metropolitan's member agency, Calleguas Municipal Water District (Calleguas), boundaries; refer to the attached project figure. The proposed Project areas identified as the North Campus Expansion Area and South Campus Expansion Area, located north and south of the existing Del Rio Campus, are not currently within Metropolitan's service area and must be annexed before water is served. If the parcels ever develop and receive imported water, they must be annexed to Metropolitan and Calleguas. Metropolitan is a responsible agency with respect to annexation and needs to be listed in the agency approval list related to EIR actions.

700 N. Alameda Street, Los Angeles, California 90012 • Mailing Address: Box 54153, Los Angeles, California 90054-0153 • Telephone (213) 217-6000

Dr. John Puglisi, Ph.D.  
 Page 2  
 January 6, 2025

1

The Draft SEIR needs to include in the project description a brief statement on the proposed annexation to Metropolitan, Calleguas, and Ventura LAFCO, including water standby charges and other required conditions for annexation. Then, in the appropriate impact section (e.g., water supplies or utilities), this proposed annexation must be analyzed so that Metropolitan and others can rely on the Draft SEIR for their discretionary actions. We encourage the Rio School District to work with Metropolitan, Calleguas, and Ventura LAFCO on annexation procedures by contacting Ethel Young at (213) 217-7677 or [eyoung@mw2o.com](mailto:eyoung@mw2o.com).

Under Metropolitan's Administrative Code Section 3100, property outside Metropolitan's service area requires annexation before water is served. Section 3104(b) states, "water sold and delivered by the District shall not be used in any manner which intentionally or avoidably results in the direct or indirect benefit of areas outside the District including use of such water outside the District or use thereof within the District in substitution for other water used outside the District." Promoting the development of areas not annexed to Metropolitan while receiving the benefit of imported water would otherwise confer direct benefit to the Rio School District. If the Rio School District intends to approve development in the unannexed area, it must annex the areas before development. See also Metropolitan's Administrative Code Section 4509, restricting the use of imported water and its benefits to use within Metropolitan's service area. Excerpts of the relevant code sections are enclosed for reference.

2

We encourage projects within its service area to include water conservation measures. Water conservation, reclaimed water use, and groundwater recharge programs are integral to regional water supply planning. Metropolitan supports mitigation measures such as using water-efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increased water use associated with the proposed Project.

We appreciate the opportunity to provide input to your planning process, and we look forward to receiving the Final SEIR and future environmental documentation on this Project. Please contact Ms. Brenda Marines at (213) 217-7902 or [bmarines@mw2o.com](mailto:bmarines@mw2o.com) if you require further assistance.

Very truly yours,

 Digitally signed by  
 Sean Carlson  
 Date: 2025.01.06  
 10:48:01 -08'00'

Sean Carlson  
 Team Manager, Environmental Planning

BSM:bsm

Enclosures:

- 1) Project Location Figure
- 2) Excerpts of Section 3104 and 4509 of Metropolitan's Administrative Code

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|-----------------|----------------------------------------------------------------------------------------------------------------------------|
| <b>Letter 3</b> | <b>Sean Carlson, Team Manager, Environmental Planning</b><br><b>The Metropolitan Water District of Southern California</b> |
|-----------------|----------------------------------------------------------------------------------------------------------------------------|

### **Response to Comment 3-1**

The Final SEIR includes a revised project description with a statement on the proposed annexation process to Metropolitan, Calleguas, and the Ventura Local Agency Formation Commission (LAFCO), including water standby charges and other conditions. The water supply and utilities section analyzes the annexation to support discretionary actions by responsible agencies. The RSD will contact Ms. Ethel Young ([eyoung@mwdh2o.com](mailto:eyoung@mwdh2o.com)), (213) 217-7677) to initiate annexation discussions.

### **Response to Comment 3-2**

The Project design incorporates water-efficient fixtures, drought-tolerant landscaping, and reclaimed water use. The Final SEIR further evaluates opportunities to integrate reclaimed water and other conservation strategies to offset increased water demand.

DRAFT

## 3.0 DRAFT EIR CORRECTIONS AND ADDITIONS

### 3.1 OVERVIEW

This section contains revisions to the Draft SEIR. The following corrections and changes are made to the Draft SEIR and are incorporated herein as part of the SEIR. The changes below were made to the Draft SEIR in response to comments received and errata discovered after the Draft SEIR was circulated. In reviewing and responding to comments on the Draft SEIR, the RSD determined that minor revisions to portions of the Draft SEIR text were warranted to provide clarification or amplification of certain information, particularly regarding the modified project's annexation plan, relocation of the District Transportation and Parking Facility (DTPF), adjustments to parking and student drop-off areas, and updated phasing and scheduling. These corrections and clarifications represent additional information or revisions that do not significantly alter the modified project, change the SEIR's significance conclusions, or result in a conclusion that significantly more severe environmental impacts could result from the modified project compared to the District-certified Final Environmental Impact Report (FEIR). The RSD finds that the changes and modifications made as identified below do not individually or collectively constitute significant new information within the meaning of CEQA Guidelines Section 15088.5.

CEQA Guidelines Section 15088(d) provides that where the response to comments makes important changes in the information contained in the text of the Draft SEIR, the Lead Agency should either revise the text in the body of the SEIR or include marginal notes showing that the information is revised in the response to comments.

The revisions identified below were made to the text of the Draft SEIR, and amended text is identified by section number. Amended text to the Draft SEIR is shown in italicized underline and grey highlight (example) when new text has been added. Removed text is shown in italicized strikethrough, italics, and grey highlight (example). This Additions and Corrections section is included because it provides a means by which the corrections and additions in the Draft SEIR are presented in one place.

### 3.2 CORRECTIONS AND ADDITIONS TO DEIR SECTIONS

#### 3.2.1 Changes to Table of Contents

- The following revisions were made to the TOC.

##### List of Figures

Figure 1 Project Site Plan

Figure 2 Project Phasing Plan

##### List of Appendices

Appendix A – Final Environmental Impact Report – Rio Del Valle Middle School Existing Campus Expansion Master Plan

Appendix B – Updated Water Resources System Reports

Water Demand Technical Memorandum

Preliminary Hydrology Report

Sewer Preliminary Investigation

Preliminary Drainage Report

Downstream Sewer Analysis

Appendix C – Updated Traffic and Circulation Study and VMT Analysis

Traffic and Circulation Study

VMT Analysis Memorandum

Appendix D – Historic Resources Report

Appendix E – Joint Use Agreement for the Construction and Operation of the Rio Del Valle Junior High School

### 3.2.2 Changes and Errata to Section 1.0 Introduction

#### **Section 1.0: Rational and Compelling Reason**

- The following revision was made to paragraph 3, page 1.

The northern campus expansion area (10 acres) was recently acquired and has been designated for the District's agricultural/farm program, including an access road and an area for future farm storage as well as for farm equipment and an agricultural classroom area. ~~However, this parcel is no longer a part of the modified project since it will remain in agricultural use and was removed from the annexation plan presented in the FEIR at the request of the City of Oxnard staff.~~ This parcel will remain in agricultural use within unincorporated Ventura County and is excluded from the annexation plan to the City of Oxnard, consistent with the October 2023 Settlement Agreement and City of Oxnard staff recommendations.

#### **Section 1.0: Rational and Compelling Reason**

- The following revision was made to page 1, paragraph 7.

State agency approvals include the California Department of Education (CDE) and the California Department of Toxic Substances Control (DTSC). The Department of State Architect (DSA) ~~previously~~ most recently approved the fields and related structures constructed in 2022.

### 3.2.3 Changes and Errata to Section 2.0 Description of Proposed Revisions

#### **Section 2.2 Proposed Project Covered by the FEIR**

- The following revision was made to page 4, paragraph 4.

The proposed project covered by the FEIR included development within the expanded campus which would occur in two phases, described in the following paragraphs, including options for: new classrooms, library and media center, multi-purposed building, transportation and parking facilities, recreational facilities including a 320-meter track, flag football field, six basketball courts, baseball field, softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, jogging path, an athletic restroom/storage building, and up to ten tennis courts and/or pickleball courts. ~~Some of these facilities including Parking Lot B, a 320-meter track and flag football field, two soccer fields, and four basketball courts were completed in the fall 2022. These improvements that were completed in 2022 were discussed in the District-certified FEIR and will not be analyzed further in this SEIR since they have not changed, though this SEIR will highlight those 2022 improvements already completed to clarify project components under review as part of this modified project, and in consideration of potential cumulative effects.~~

#### **Section 2.2 Proposed Project Covered by the FEIR**

- The following revision was made to page 5, paragraph 6.

The existing main campus includes the RDV Gymnasium (gym) which is located adjacent to the proposed southern campus expansion area. It should be noted that the gym is a Joint Use facility partially funded by the County and shared with community organizations including the John F. Flynn Community Clinic and the Sheriff's Department as set forth and described in a Joint Use Agreement (see Appendix E). The District has exclusive use of the gym during regular and summer school hours and during school events. The County provides a share of the operation and maintenance budget for the gym. In return, the County and community organizations may use the gym for uses that are compatible with school purposes, during hours when the school is not using the gym. ~~The existing parking along with ingress and egress at RDV has been inadequate for several decades due to expansions of both Rose Avenue and the school itself, and therefore RSD is proposing to assign overflow parking on the proposed new adjacent parking area (Parking Lot A) when school is not in session. This SEIR clarifies that expansion of these~~

uses is not currently planned, and existing uses will benefit from the additional parking and other infrastructure improvements. The John F. Flynn Community Clinic operates as a pediatric well-child clinic, serving approximately 18 to 20 patients per day, spread relatively evenly throughout the day. The clinic provides services three days a week and offers nurse-only visits for pediatric vaccinations on the other two days, operating from 8:00 a.m. to 5:00 p.m. Monday through Friday. Activities include medical care and training, with minimal parking and traffic demand, as detailed in the Transportation section of this SEIR. The Sheriff's Department also has access to the gym on an as-needed basis, historically a few times a month with one or two sheriff vehicles, unless required for emergency use, resulting in minimal parking and traffic impacts. The proposed infrastructure improvements, including the addition of Parking Lot A with 150 spaces, are designed to support these existing joint uses, particularly during community events or peak times such as sporting events, without necessitating an intensification of activities. The additional parking and circulation enhancements improve safety and accessibility for current operations, accommodating existing demand without encouraging significant increases in the number of people or activities onsite.

## **Section 2.2 Proposed Project Covered by the FEIR**

- **The following revision was made to page 5, paragraph 6.**

### **Existing Main Campus Recreational Renovations**

RSD processed field renovation plans and an associated parking facility replacement through the California Department of General Services, Division of the State Architect (DSA) on the existing main campus, in the fall of 2022. These improvements completed in the fall of 2022 consisted of a new parking lot (Parking Lot B), a 320-meter track, flag football field, two soccer fields, and four basketball courts. The completed 2022 improvements will not be analyzed further in this SEIR. Due to the scope of these improvements, RSD included these 2022 improvements in the FEIR to provide a full and complete review of cumulative effects in combination with this proposed project. The proposed project covered by the FEIR includes recreational renovations on the existing main campus, including a baseball field, a softball field, an athletic restroom/storage building, and up to ten new tennis and/or pickleball courts. RSD intends to make these renovated fields open to community use outside of school hours. (added)

## **Section 2.2 Proposed Project Covered by the FEIR**

- **The following revision was made to page 5, paragraph 7. The paragraph was removed.**

### **Existing Main Campus Recreational Renovations**

Additional recreational renovations will be undertaken on the existing main campus, including a baseball field, a softball field, an athletic restroom/storage building, and up to ten new tennis and or pickleball courts. RSD intends to make these renovated fields open to community use outside of school hours. To facilitate these existing campus renovations, the existing parking lot located at the northeastern corner of the existing main campus parcel was relocated to the northwestern corner of the existing main campus in 2022, with direct access to Rose Avenue. This relocated parking facility (Parking Lot B) consisted of 95 spaces (91 standard stalls and four accessible stalls) and has received all necessary approvals from DSA.

[No corresponding paragraph in the Final SEIR; text was removed entirely.]

## **Section 2.2 Proposed Project Covered by the FEIR**

- **The following revision was made to page 6, paragraph 3.**

### **Utility Improvements**

Existing utility lines are present within the southern campus expansion area. Utility undergrounding along public ROW were proposed to occur as part of Phase I. Water and sewer related utility improvements associated with the proposed project covered by the FEIR were proposed for construction during Phase II. However, this SEIR clarifies that all off-site sewer, water, and storm drain improvements will be completed in Phase I-B, such that Phase II-A

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and/or Phase II-B improvements (see new phasing described below under modified project heading [Section 3]), shall not be commenced without those components in place.

## **Section 2.2 Proposed Project Covered by the FEIR**

- **The following revision was made to page 7, paragraph 3.**

### **DTPF**

This SEIR clarifies that the bus parking areas of the Project will be used only for bus parking, and not for heavy vehicle maintenance; that no automotive maintenance products, such as motor and transmission oil, paint, or fuel will be stored or disposed of at the Project site; and bus maintenance and fueling will continue to be performed off-site by third-party vendors. Recent past purchase orders for off-site bus maintenance have been included in Appendix F, to demonstrate that heavy vehicle maintenance has been and will continue to be conducted off-site.

[No corresponding paragraph in the Final SEIR; text was removed entirely.]

## **Section 2.3 Significant Unavoidable Impacts**

- **The following revision was made to page 8, paragraph 1.**

Impacts related to agricultural land conversion (Agriculture and Forestry Resources) were found in the FEIR to be significant and unavoidable. All other topics would be less than significant or less than significant with mitigation incorporated. Significant and unavoidable impacts to Agriculture and Forestry Resources remain as described in the original FEIR.

## **3.2.4 Changes and Errata to Section 3.0 Supplement-Modified Project**

### **Section 3.0 Supplement-Modified Project**

- **The following revisions were made to Section 3.0, page 9, paragraph 1.**

In the District-certified EIR, the Project included the annexation of the northern campus expansion area into the City of Oxnard. However, under this SEIR, the District is proposing the annexation of the southern campus expansion and existing main campus areas only into the City of Oxnard. All proposed classroom facilities will be connected to the existing campus via direct pedestrian pathways (see Figure 1). Improvements completed in 2022 are shown as existing, and elements pertinent to annexation are highlighted. Improvements completed prior to 2023 in 2022 are shown as existing, and elements pertinent to annexation are highlighted. For maintenance, security, and emergency needs, the proposed educational buildings can be accessed by vehicle via a paved fire access road, which connects to the proposed north-south access road from Collins Street and the existing campus parking lot, as well as the proposed DTPF area. Fire access roads serving the proposed buildings offer access to the existing fire access road that loops the “old” main campus as well. The existing road outlets by Parking Lot B in the northwest corner of the RDV campus. There are three potential fire access routes to proposed buildings: the proposed N/S access road and Parking Lot A, DTPF, and existing main campus fire access road. All road resurfacing and reconstruction will use rubberized asphalt, curb to curb. The exact specifications and locations of fire access roads is subject to approval by the Oxnard Fire Department.

### **Section 3.0 Supplement-Modified Project**

- **The following paragraph was added to Section 3.0, page 1.**

This Final SEIR addresses the annexation of the existing main campus (20.2 acres, APN 144-0-110-445) and the southern campus expansion area (11.3 acres, APN 144-0-110-590) to the service areas of the Metropolitan Water District of Southern California (Metropolitan) and Calleguas Municipal Water District (Calleguas), with the approval of the Ventura Local Agency Formation Commission (LAFCO) to secure potable water service from the City of Oxnard. The annexation process includes compliance with water standby charges and other conditions set by Metropolitan and Calleguas, as required under Metropolitan’s Administrative Code Sections 3100, 3104(b), and 4509. The RSD will coordinate with Metropolitan, ensuring alignment with regional water supply requirements. This

annexation supports the project's water infrastructure improvements, detailed in Section 5.19, and facilitates discretionary approvals by responsible agencies.

### **Section 3.0 Supplement-Modified Project**

- The following changes were made to page 10, paragraph 2.

#### **Existing Main Campus – Modified Project**

The proposed fields will accommodate the immediate and anticipated increase in student enrollment and the associated demand on recreational facilities. The District intends to make these renovated fields open to community use outside of school hours. All other existing educational and community uses occurring on the existing main campus will remain “as is” and will not be modified, expanded upon, or otherwise altered in any manner by the modified project. The modified project clarifies that the existing joint uses of the RDV Gymnasium by the John F. Flynn Community Clinic and the Sheriff's Department, as described in the Joint Use Agreement (see Appendix E), are not planned for expansion. These existing uses will benefit from the additional parking and other infrastructure improvements proposed in the modified project, such as Parking Lot A and enhanced circulation features.

### **Section 3.0 Supplement-Modified Project**

- The following changes were made to page 11, paragraph 3 and 4.

#### **The District Transportation & Parking Facility (DTPF)**

The DTPF is approximately 2.7 acres and will be located approximately 730 feet to the east of Rose Avenue, in the southeastern corner of the southern campus expansion area. The DTPF will take primary access off a new driveway from Collins Street to the south of the facility. This driveway is dedicated to DTPF utilization only and is completely separated from the general public entrance to the campus from Collins Drive, located to the west near the intersection of Rose Avenue and Collins Street. A secondary, emergency only access route links the DTPF to the campus core and Parking Lot A. The DTPF will consist of approximately 20,338 SF of buildings and structures. The proposed new buildings, which consist of a DTPF building (10,800 SF), food service building (6,850 SF), two portable offices (1,080 SF each), and restrooms (528 SF), will be a combination of modular /portable office structures and slab on grade structures. Additionally, the facility will contain 26 bus parking spaces, 35 standard vehicle parking spaces, and four accessible stalls. Buses will be parked in the DTPF. The 10,800 SF DTPF building is intended for administrative and operational purposes, including administrative offices, storage areas, and support spaces for District RSD transportation operations. No vehicle maintenance activities, such as oil changes or storage and disposal of automotive materials (e.g., motor oil, transmission oil, paint, or fuel), will occur onsite; all such maintenance will continue to be conducted offsite by third-party vendors, as demonstrated by past purchase orders (see Appendix F). The revised site plan (Figure 1) and submitted plans have been updated to reflect this purpose, removing references to vehicle maintenance facilities (e.g., mechanics office or shop) to ensure consistency with the project description. Additionally, the facility will contain 26 bus parking spaces, 35 standard vehicle parking spaces, and four accessible stalls. Buses will be parked in the DTPF.

This SEIR clarifies that the bus parking areas of the Project will be used only for bus parking, and not for heavy vehicle maintenance; that no automotive maintenance products, such as motor and transmission oil, paint, or fuel will be stored or disposed of at the Project site; and bus maintenance and fueling will continue to be performed off-site by third-party vendors. Recent past purchase orders for off-site bus maintenance have been included in Appendix F, to demonstrate that heavy vehicle maintenance has been and will continue to be conducted off-site.

### **Section 3.0 Supplement-Modified Project**

- The following text was added to Section 3.0, page 12.

#### **The District Transportation & Parking Facility (DTPF)**

##### **Off-Site Improvements.**

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The modified project includes the following off-site and on-site transportation and pedestrian improvements, implemented in Phase I-B, to enhance safety, traffic flow, and pedestrian access while maintaining compliance with City of Oxnard standards (see Figures 1 and 2):

**Signalized Intersection Enhancements:**

- Upgrades at Rose Avenue/Walnut Drive and Rose Avenue/Collins Street, including signal timing with City-standard parameters (minimum greens for bicycles, CAMUTCD-compliant Walk/Don't Walk times, and yellow intervals), funded by RSD.
- Perpendicular pedestrian crossings at the north leg of these intersections, designed to minimize crossing distance and connect to the student walkway to school buildings, with details clarified in the conceptual plan (Figure 1).

**Auto Center Drive/Collins Street Improvement:**

- Southbound left-turn restrictions via a raised median and signage to accommodate school buses and peak-hour traffic, diverting trips to Rose Avenue/Collins Street with a restriped westbound approach.

**Bus Turnaround and Drop-Off Area:**

- On-site bus turnaround within the southern campus expansion area (APN 144-0-110-590), designed with AutoTURN analysis to accommodate school bus turning radii, ensuring safe maneuvering without impacting public streets.

**Enhanced drop-off area along Rose Avenue with:**

- Single-lane ingress, prohibiting entry to Parking Lot A.
- Designated third lane guiding drivers to Parking Lot A.
- Southbound traffic restriction within Parking Lot A.
- Raised median to prevent southbound entry into the drop-off ingress, directing traffic to designated entry points.
- RSD-managed operations to ensure safe and efficient traffic flow, aligned with a school traffic management plan promoting mode shifts, circulation, and safety.

**Pedestrian Access Improvements:**

- Sidewalk along the westerly side of Rose Avenue between Auto Center Drive and Collins Street, designed to City standards for major arterials, complementing curb, gutter, sidewalk, and bike lane enhancements along Rose Avenue and Collins Street.

These improvements, depicted in the Project Site Plan (Figure 1) and Phasing Plan (Figure 2), are considered Development Application Conditions (DAC) by the City and detailed in RSD's DAC response, maintaining a less-than-significant transportation impact per the Stantec Updated Traffic and Circulation Study (Stantec 2024, Appendix C). (added)

**Section 3.0 Supplement-Modified Project**

- The following paragraphs were added to page 14, and 15.

**Infrastructure and Utilities**

The RDV Middle School Campus Master Plan Project includes on-site improvements, such as new classrooms, a bus drop-off area, and Parking Lot A, as well as off-site infrastructure to support annexation to the City of Oxnard and enhance access and safety (see Figure 1). Off-site improvements include sewer, water, and storm drain connections, as well as curb, gutter, sidewalk, and bike lane improvements along the project frontage on Rose Avenue and Collins Street, constructed in Phase I-B to align with City of Oxnard standards. These improvements, depicted in the site plan (Figure 1) and phasing plan (Figure 2), also encompass roadway and signalized intersection

enhancements (e.g., Rose Avenue/Walnut Drive, and Rose Avenue/Collins Street) in Phase I-B, as detailed in Section 3.1 and Section 5.17 Transportation.

The modified project includes off-site roadway infrastructure improvements to adjacent roadways, specifically Rose Avenue and Collins Street, to mitigate traffic impacts and support project implementation. These improvements, to be completed in Phase I-B, include the construction of curbs, gutters, sidewalks, and bike lanes along the project frontages of Rose Avenue and Collins Street, as well as the entire parking plan for Parking Lot A. Additionally, the RSD will upgrade the traffic signal at the egress to RDV Middle School and contribute a pro rata share (estimated at 10%) toward the traffic signal at the Collins Street intersection. These improvements enhance traffic flow, pedestrian and cyclist safety, and access to the campus, with construction and operational impacts evaluated in the Transportation (Section 5.17), Air Quality (Section 5.3), Noise (Section 5.13), and Utilities and Service Systems (Section 5.19) sections of this SEIR. Additional measures may be taken beyond the mitigation identified herein, as part of the annexation process.

### **Section 3.0 Supplement-Modified Project**

- The following revisions were made to page 15.

#### **Stormwater**

Stormwater improvements will be constructed in a phased approach concurrent with each phase of the project as described in the 'Modified Project Phasing' section (Section 3.1). The modified project is subject to compliance with the 2021 Ventura County Municipal Separate Storm Sewer (MS4) Permit. Low flows will be treated prior to flowing into the proposed infiltration basin, with hydrodynamic separators assumed for treatment. At this time, it is assumed that hydrodynamic separators will be used for treatment. Infiltration will be 18' below existing grade, requiring separate detention and infiltration to allow for deeper infiltration and thus will require separate detention and infiltration to allow for infiltration to be deeper. Construction will be divided into three phases (I-B, II-A, II-B), with each phase handling stormwater conveyance separately. Infiltration for Phases I-B, II-A, and II-B will be combined into one underground infiltration basin within Phase II-A and with a total volume of 15,000 CF, constructed as part of Phase I-B. Detention for all three phases will be consolidated into a single above-ground detention basin located within Phase II-B, with a total volume of 34,600 CF, also constructed during Phase I-B, which will also be constructed during Phase I-B which may be modified to a below-ground storage basin during Phase II-B. The detention basin is designed to mitigate 10-, 50-, and 100-year post-development peak runoff to the 10-year pre-development condition, exceeding City of Oxnard requirements, to address an existing deficiency in the City's storm drainage system, including tributary runoff to Lateral H, for which RSD is not responsible (Jensen Design & Survey 2024b, Appendix B; Chau, 2025). The Preliminary Drainage Study (Jensen Design & Survey 2024b, Appendix B) analyzes flow conveyance and detention for the tributary draining to Lateral H under existing, intended design, and proposed development conditions, ensuring no adverse impact on Lateral H's capacity. Calculated detention volumes for each phase are: Phase I-B, 14,700 CF; Phase II-A, 15,700 CF; and Phase II-B, 3,200 CF, totaling 34,600 CF. The new estimated volumes for stormwater are as follows: Phases I-B, II-A, and II-B are combined in a single underground infiltration basin with a total volume of 15,000 CF; Detention will be constructed in a single location to serve all phases. Calculated detention volumes for each phase are as follows. Phase I-B detention is 14,700 CF; Phase II-A detention is 15,700 CF; and Phase II-B detention is 3,200 CF (See Preliminary Hydrology Report [Jensen Design & Survey 2024b] in Appendix B). These measures, combined with the Stormwater Pollution Prevention Plan (SWPPP) and Low Impact Development (LID) measures, prevent downstream flooding and maintain compliance with City and Ventura County Watershed Protection District standards (Jensen Design & Survey 2024b, Appendix B).

### **Section 3.1 Modified Project Phasing**

- The following revisions were made to page 17.

The modified project will be implemented in three phases (I-B, II-A, II-B), as detailed below and depicted in the phasing plan (Figure 2). Phase I-B includes critical infrastructure and access improvements to support the project

and annexation to the City of Oxnard, including off-site sewer, water, and storm drain improvements, landscape improvements along Rose Avenue and Collins Street adjacent to Parking Lot A, fire access lane, and bus drop-off area/drop-off lane. To address the City of Oxnard's recommendation, off-site roadway improvements and signalized intersection enhancements, such as those at Rose Avenue/Walnut Drive and Rose Avenue/Collins Street, are also included in Phase I-B to ensure early implementation of traffic-related infrastructure, as depicted in Figure 2. These improvements, which may include signal timing updates and directional signage, are considered Development Application Conditions (DAC) by the City and are addressed in the RSD's response to the City's DAC comments, separate from CEQA mitigation requirements. The Stantec Updated Traffic and Circulation Study (Stantec 2024, Appendix C) confirms that these improvements maintain a less-than-significant transportation impact, as the project does not conflict with applicable transportation plans, policies, or safety standards (see Section 5.17 Transportation). Subsequent phases (II-A and II-B) will include additional on-site improvements, with storm drain treatment improvements deferred to Phase II-A, as negotiated in the Settlement Agreement.

The proposed project covered by the FEIR can generally be classified into two phases, Phase I and Phase II. Each Phase can be broken down into two "sub-phases", noted as Phase I-A/I-B and II-A/II-B. Phase I-A refers to improvements that would be completed on the existing main campus under the District-certified FEIR prior to the modified annexation plan presented in this SEIR. The RSD would provide additional recreational renovations on the existing main campus before annexation (during Phase I-A), including a baseball field, softball field, an athletic restroom/storage building, and up to 10 new tennis and/or pickleball courts. All other improvements would take place according to the phasing plan outlined in this section (see **Figure 1**).

Per the October 2023 Settlement Agreement, all off-site improvements and improvements impacting the public right-of-way, including but not limited to off-site sewer, water, storm drain infrastructure, landscape improvements along Collins Street, fire access land, and bus drop-off area/drop-off lane, will be completed in Phase I-B, except for specific storm water treatment improvements associated with later project components (e.g., District Vehicle/Bus Parking), which are scheduled for Phase II-A. The project phasing plan is illustrated in Figure 2, which depicts the sequence and location of improvements for each phase, including off-site roadway improvements to Rose Avenue and Collins Street (see Figure 2).

Per request by the City of Oxnard, this SEIR clarifies that all sewer and water upgrades, including storm drain improvements associated with those components, are intended to be completed in Phase I. Additionally, all off-site sewer, water, and storm drain improvements will be completed in Phase I-B, such that Phase II-A and/or Phase II-B improvements (see new phasing described below under modified project heading [Section 3]), shall not be commenced without those components in place. This SEIR further clarifies that all off-site sewer improvements would be completed prior to commencing Phase II activities.

### **Section 3.1 Modified Project Phasing**

- **The following revisions were made to the project phasing description starting on page 18.**

#### **Phase I-B**

1. Student Drop Off Lanes
2. Parking Lot A (large southern parking area)
3. New north/south access road east of Parking Lot A
4. Landscape improvements along the full length of Rose Avenue and along Collins Street adjacent to Parking Lot A  
~~Landscape improvements along Rose Avenue & Collins Street Adjacent to Parking Lot A~~
5. Water and Sewer Improvements, including all off-site sewer and water infrastructure as required by the City of Oxnard  
~~Water and Sewer Improvements, Off-Site Sewer, Water, and Storm Drain Improvements as required by the City of Oxnard~~

6. Utility Undergrounding & Electrical Infrastructure
7. Phase I-B Storm Drain Infrastructure Installation, including all initial off-site storm drain improvements as required by the City of Oxnard (specific storm water treatment improvements are scheduled for Phases II-A and II-B) Phase I-B Storm Water Treatment Improvements
8. Public ROW Improvements in Collins Street, including fire access road and bus drop-off area/drop-off lane, as required by the City of Oxnard. Public ROW Improvements in Collins Street as required by the City of Oxnard.
9. Off-Site Roadway Improvements to Rose Avenue and Collins Street, including curbs, gutters, sidewalks, bike lanes, and traffic signal upgrades (e.g., upgrade to the traffic signal at the RDV egress and a pro rata share of the traffic signal at Collins Street), to mitigate CEQA-identified traffic impacts (see Section 5.17 and Figure 2 for phasing details).

#### Phase II-A

1. DTPF Building (10,800 SF)
2. Food Services Building (6,850 SF)
3. DTPF Parking Areas
4. Farmhouse Renovations/Conversion to District transportation offices
5. Office Portables (x2) and Restrooms for District transportation offices
6. Additional Landscape Improvements along Collins Street, excluding areas adjacent to Parking Lot A completed in Phase I-B. Landscape Improvements along Collins Street.
7. Bus Drop Off Area/Drop Off Lane
8. Phase II-A Storm Water Treatment Improvements, including specific treatments for components such as District Vehicle/Bus Parking, distinct from the initial storm drain infrastructure installed in Phase I-B (see Figure 2). Phase II-A Storm Water Treatment Improvements.

#### Phase II-B

1. 11,600 SF Classrooms (x8)
2. 3,575 SF Multi-Purpose Building
3. 4,000 SF Library and Media Center
4. Portable PE Classrooms (x2)
5. "Flex" Multi-Sport Field
6. Basketball Courts (x2)
7. Sand Volleyball Courts (x4)
8. Phase II-B Storm Water Treatment Improvements, distinct from the initial storm drain infrastructure installed in Phase I-B (see Figure 2). Phase II-B Storm Water Treatment Improvements.
9. Fire Access Road.
10. Off-Site Sewer, Water, and Storm Drain improvements as required by the City of Oxnard.

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### 3.2.5 Changes and Errata to Section 5.0 Comparison of Original and Modified Project

#### **Section 5.2 Agriculture and Forest Resources**

- The following revision was made to page 19.

The modified project will convert 11.3 acres of important farmland in the southern campus expansion area to non-agricultural use for the RDV Middle School expansion, including facilities such as Parking Lot A, the DTPF, and recreational fields (see Section 3, Figure 1). The entire 11.3-acre southern campus expansion area is designated as Agricultural Land, classified as Prime Farmland or Farmland of Statewide Importance under CEQA Guidelines Section 21060.1, and is subject to the City of Oxnard's Save Our Agricultural Resources (SOAR) Ordinance. This conversion results in a significant and unavoidable impact under CEQA, as identified in the District-certified FEIR. The District-certified project would convert important farmland in the southern campus expansion area to non-agricultural use. Mitigation Measures AG-1 and AG-2 were provided as partial mitigation for the loss of important farmland. AG-3 (per Section 5.2 updates) are provided as partial mitigation for the loss of this important farmland, but the impact remains significant and unavoidable. The northern campus expansion area would not involve conversion to a non-agricultural use as this area is currently utilized for agriculture and RSD plans to utilize this area as an outdoor working farm "classroom." In addition, Mitigation Measure AG-2 confirms the commitment to retaining the agricultural use of the northern campus expansion area for a minimum of 10 years. If after 10 years, the land uses on the adjacent off-site properties to the north and the east of the northern campus expansion area are no longer agricultural, the District will re-evaluate the compatibility of retaining the agricultural use of the northern campus expansion area. The northern campus expansion area (10 acres) is not part of the modified project, as stated in Section 1 Introduction, with no associated mitigation measures (see Section 1), therefore AG-2 has been removed. The changes represented in this SEIR, including the annexation of the southern campus expansion area and existing main campus to the City of Oxnard, do not introduce new impacts or increase the severity of the identified significant impact to agricultural resources (see Section 5.11 for land use consistency).

In order to further reduce the impacts associated with farmland conversion of the 11.3 acres of the southern campus expansion area, designated as Prime Farmland or Farmland of Statewide Importance under CEQA Guidelines Section 21060.1 and subject to the City of Oxnard's SOAR Ordinance 8.7 acres of the southern campus expansion area actively used for agricultural production, Mitigation Measure AG-3 has been added to the SEIR.

AG-3: The District shall pay an agricultural conservation in-lieu fee to the City of Oxnard. The final fee amount shall be determined by the RSD and the City of Oxnard. 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. The final fee amount shall be determined and the payment of the fee to the City of Oxnard shall be made prior to annexation of the proposed project Site (main campus and southern campus expansion area).

#### **Section 5.3 Air Quality**

- The following text was added to page 26, paragraph 3.

As documented in the FEIR, the proposed project covered by the FEIR would have less than significant impacts related to air quality with implementation of Mitigation Measure AQ-1, to control potential emissions during construction activities. The changes represented in this SEIR would not affect total emissions, nor would they increase concentrations originating from the modified project. These changes would not introduce new, nor significantly increase emissions related to Air Quality. The air quality analysis incorporates impacts from joint use activities, including youth sports groups such as Oxnard Youth Baseball, Oxnard Youth Soccer, and Rio Area community youth sports groups utilizing Parking Lot A and the RDV Sports Complex. Emissions from vehicle trips and activities associated with these joint uses, accommodated by the 150 parking spaces in Parking Lot A (see Section 3, Figure 1), are included in the operational emissions modeling (see Appendix B, Air Quality Modeling Data). The analysis confirms that these joint use activities do not result in significant air quality impacts, as they are

integrated into the project's emissions scenarios evaluated for the modified project (see Section 5.17 for related transportation analysis).

### **Section 5.9 Hazards and Hazardous Materials**

- **The following revision was made to paragraph 1, page 33.**

As documented in the FEIR, impacts related to hazards and hazardous materials related to the proposed project covered by the FEIR would remain less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2, and HAZ-3.

### **Section 5.9 Hazards and Hazardous Materials**

- **The following text was added to page 33.**

The RSD ensures environmental safety and regulatory compliance for the RDV Middle School Campus Expansion Project, addressing hazardous materials concerns in the 11.3-acre southern campus expansion area (APN 144-0-110-590). This area, part of the 11.1-acre portion under the Environmental Oversight Agreement (EOA, Docket No. HAS-FY21/22-135) with the DTSC, has a minor acreage discrepancy due to updated surveys. Historically and currently used for agriculture, the area has undergone environmental investigations, including a Phase I Environmental Site Assessment (ESA, Tetra Tech, September 23, 2021), Phase II investigations, and a Supplemental Site Investigation (SSI, Tetra Tech, September 26, 2022).

These investigations, documented in the Preliminary Endangerment Assessment (PEA) Equivalent Report and SSI Report, identified organochlorine pesticides (OCPs) and other recognized environmental conditions (RECs), with DTSC oversight and approval letters issued on October 27, 2022, and June 22, 2023. Additional soil sampling was conducted under DTSC oversight from January 6–10, 2025, further characterizing RECs and residual OCPs, with results expected by August 2025 and incorporated herein. This Final SEIR details historic and current land uses, references the ESA, SSI, and DTSC approvals, and addresses DTSC's June 22, 2022, Notice of Preparation (NOP) comments.

This Final SEIR implements protocols and mitigation measures across project phases (Phases I-B, II-A, and II-B, as outlined in Section 3) to address DTSC's comments. Mitigation Measures HAZ-1, and HAZ-2 from the FEIR apply, ensuring identification, handling, and remediation of hazardous materials to maintain less-than-significant impacts. The RSD will coordinate these measures with DTSC, providing regular implementation updates and a detailed timeline herein. For imported soil and fill material, the RSD will test all materials for contaminants per DTSC's PEA Guidance Manual and Clean Imported Fill Material Fact Sheet, with sampling based on source and prior land use, the results documented, and submitted to DTSC, addressing DTSC Comments DTSC-3 and DTSC-10 on the Draft SEIR.

If suspected soil or groundwater contamination is encountered during construction, grading, or demolition, work will cease in the affected area, health and safety procedures will be implemented to protect workers and the community, and the RSD will coordinate with DTSC for investigation, sampling, and remediation, as outlined in DTSC Comments DTSC-4 and DTSC-11 on the Draft SEIR. No building demolition is currently planned for the southern campus expansion area. If proposed in future phases, the RSD will conduct hazardous materials surveys for lead-based paints, mercury, asbestos-containing materials, and polychlorinated biphenyl caulk, with sampling being conducted near current or former building locations per DTSC's PEA Guidance Manual, as per DTSC Comment DTSC-7 on the Draft SEIR. Removal and disposal of these materials will comply with California regulations, with results being submitted to DTSC for review.

The RSD will protect students, staff, and the community by addressing DTSC's comments and upholding rigorous environmental standards. This Final SEIR consolidates the investigation results, mitigation measures, and protocols, documenting DTSC's oversight and the RSD's submission of the final investigation report by August 2025 for DTSC review and approval. This comprehensive approach ensures transparency, safety, and alignment with DTSC guidance across all project phases.

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## **Section 5.10 Hydrology and Water Quality**

- **The following text was added to page 35.**

As documented in the FEIR, the proposed project covered by the FEIR would have less than significant impacts related to hydrology and water quality, with Mitigation Measures HYDRO-1, HYDRO-2, and HYDRO-3.

The modified project would not alter the City's storm water drainage features associated with the proposed project covered by the FEIR. The 13.1-acre site (southern campus expansion area), which includes 11.3 acres of new development and 1.8 acres of redevelopment, 14.2-acre which includes 11.3 acres of new development and 2.9 acres of redevelopment, will be 41 percent impervious. For all project construction phases, stormwater runoff will be collected in an onsite storm drain system, which will carry the stormwater to a diversion structure that splits flows between infiltration, detention, and offsite. High flows from the diversion structures and flows released from the detention basin will drain east through the neighboring property in a proposed storm drain. This proposed storm drain will tie into the existing lined channel near the bend in Collins Street, which discharges into the existing City of Oxnard storm drain facilities at Collins Street and Auto Center Drive.

The modified project's storm water management plan aligns with the phasing described in Section 3 (see Figure 2). Phase I-B includes the installation of initial off-site storm drain infrastructure, such as pipes and connections, as required by the City of Oxnard to support the early phases of project development, including Parking Lot A and roadway improvements along Rose Avenue and Collins Street. Specific storm water treatment improvements, such as infiltration basins and bioswales for components like the District Vehicle/Bus Parking area, are scheduled for Phases II-A and II-B to correspond with the construction of the DTPF and other southern campus expansion area facilities. The hydrology and water quality analysis (see Appendix B) accounts for the phased implementation of these improvements, confirming that they mitigate runoff and water quality impacts consistent with City and regional requirements, including the October 2023 Settlement Agreement.

Impacts identified in the FEIR would be mitigated by the project's proposed post-construction features, which are required by the Construction General Permit and the City's MS4 Permit, will follow the TGM (County of Ventura 2011, updated 2015 and 2018), will be defined in the PCSMP, and vetted by the City. The design of the storm water drainage features will be required to comply with the City's 1 cfs/ac flow rate to prevent downstream flooding of the receiving waters and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems. Operation of the modified project would not contribute runoff that exceeds that of the existing condition, resulting in a less-than-significant impact on hydrology and water quality. The project includes stormwater detention facilities designed to mitigate post-development runoff from a portion of the existing main campus that is modified as part of the development application and the entire southern campus expansion area, as detailed in the Preliminary Drainage Study (Jensen Design & Survey 2024b, Appendix B). Per discussions with the City of Oxnard on March 6, 2025 (Chau, 2025), the RSD will provide sufficient detention to reduce 10-, 50-, and 100-year post-development peak runoff to the 10-year pre-development condition, exceeding standard City of Oxnard requirements. This detention addresses the collective impact on Lateral H, including tributary runoff from the drainage area of which the campus park is a part, by mitigating flows to less than pre-development levels, thereby reducing previously allowed impacts to Lateral H not caused by RSD. The Preliminary Drainage Study (Jensen Design & Survey 2024b, Appendix B) analyzes flow conveyance and detention for existing, intended design, and proposed development conditions, ensuring no adverse impact on Lateral H's capacity. The detention facilities prevent downstream flooding of receiving waters, maintaining compliance with City standards and Ventura County Watershed Protection District requirements. The Stormwater Pollution Prevention Plan (SWPPP) and Low Impact Development (LID) measures, implemented during construction and operation, further minimize runoff impacts (Jensen Design & Survey 2024b, Appendix B). Appendix B includes the Preliminary Drainage Study (Jensen Design & Survey 2024b), which analyzes flow conveyance and detention for the tributary draining to Lateral H under existing, intended design, and proposed development conditions, supporting the mitigation of 10-, 50-, and 100-year post-development runoff to the 10-year pre-development condition.

## **Section 5.10 Hydrology and Water Quality**

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➤ **The following text was added to page 36.**

The project Site is located outside of the 100-year and 500-year floodplain, is not within a levee or flood risk area, and it not in a seiche, tsunami, or mudflow risk area. The modified project will discharge no more than the existing runoff from a Q10 storm event ~~City required 1 cfs/ac off Site~~ (Jensen Design & Survey 2024b, Appendix B) to reduce potential ~~avoid~~ flooding impacts downstream. Given the installation of post-construction features described above, the modified project would not increase overall flood potential in the City.

Infiltration will be 18' below existing grade and thus will require separate detention and infiltration to allow for infiltration to be deeper. Construction will be divided into three phases with each phase handling stormwater conveyance separately. Infiltration for Phases I-B, II-A, and II-B will be combined into one underground infiltration basin within Phase II-A and constructed as part of Phase I-B. Detention for all three phases will be consolidated into a single above-ground detention basin located within Phase II-B, which will also be constructed during Phase I-B. During the construction of Phase II-B, this above-ground basin may be modified to a below-ground storage basin. Combined detention for all three phases is calculated to be 10,800 CF ~~34,600 CF~~.

New estimated volumes for stormwater are as follows: Phases I-B, II-A, and II-B are combined in a single underground infiltration basin with a total volume of 15,000 CF; Phase I-B detention is 3,900 CF ~~14,700 CF~~; Phase II-A detention is 5,800 CF ~~15,700 CF~~; and Phase II-B detention is 1,000 CF ~~3,200 CF~~. Operation of the modified project would not substantially deplete groundwater supplies or interfere with groundwater recharge, resulting in a less-than-significant impact on aquifer volume or local groundwater table levels, ~~such that there would not be a net deficit in aquifer volume or a lowering of the local groundwater table level~~. The Fox Canyon Groundwater Management Agency (FCGMA) adopted a Groundwater Sustainability Plan (GSP) in 2019, advising a reduction in groundwater pumping from the Oxnard Subbasin by 2040, based on the 2005-2014 base period of 53.7238 AFY (Jensen Design & Survey 2024a, Appendix B). The projected water demand for the expanded campus is 25.911 AFY, representing a 52% reduction from the base period (1 - 25.911/53.7238), achieved through irrigation improvements since 2014, conversion of existing ball fields to artificial turf, and discontinuation of crop irrigation on the 11.3-acre southern campus expansion area (Jensen Design & Survey 2024a, Appendix B). This exceeds the City of Oxnard's requested 45% reduction target, ensuring compliance with the GSP ahead of the 2040 deadline. The RSD proposes to transfer 25.911 AFY of FCGMA allocations to the City of Oxnard to accommodate the increased demand on the City's water system following annexation of the existing main campus and southern campus expansion area. This transfer would enable the project Site to be served by the City's domestic water system, maintaining sustainable groundwater management. The City of Oxnard has expressed concern that past conservation and irrigation improvements are irrelevant to the transfer, asserting that the 25.911 AFY would be reduced by an additional 45% by 2040 (to approximately 14.25 AFY), rendering it insufficient without FCGMA verification that the transfer is exempt from future reductions. Per a February 4, 2025, letter from FCGMA (Anselm, 2025), no FCGMA requirement supports an additional 45% reduction beyond the 52% achieved, as the GSP allows sustainable basin management through various methods, including allocation transfers, without mandating uniform pumping reductions for all properties. The RSD and the City are engaged in ongoing discussions to determine a justifiable water allocation transfer amount, ensuring compliance with FCGMA and City requirements while meeting the project's water needs (see Section 5.19 Utilities and Service Systems for water service details). ~~Fox Canyon Groundwater Management Agency (FCGMA) adopted a Groundwater Sustainability Plan in 2019 that requires the reduction of groundwater pumping from the Oxnard Basin. The target is to reduce the groundwater pumping by 45% from the established base period of 2005-2014. Projected demand for the expanded campus is 25.911 AFY (Jensen Design & Survey 2024a, Appendix B) which is a 52% reduction from the 2005-2014 base period (1-25.911/53.7238). Therefore, by the irrigation improvements RSD has already made since 2014, the conversion of the existing ball fields to artificial turf this year, and the discontinuation of the crop irrigation on the southern campus expansion area of 11.3 acres, RSD has already exceeded the required 45% reduction.~~ The District intends to transfer sufficient FCGMA allocations to the City of Oxnard to accommodate the increased demand the District will have on the City system with the proposed campus improvements and annexation. The District will transfer 25.911 AFY to the City of Oxnard to offset this modified project. With this transfer, the entire existing main campus and the southern campus expansion area will then be served by the City of Oxnard via the

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domestic water system. Additionally, with the transfer, the District will have already accomplished more than the 45% reduction ahead of the year 2040 that is requested by the City of Oxnard required by FCCMA (Jensen Design & Survey 2024a, Appendix B).

### **Section 5.11 Land Use and Planning**

- **The following text was replaced as follows on page 39.**

The existing RDV campus (APNs 144-0-110-445, and 144-0-110-225) is located within the City's Sphere of Influence and City Urban Restriction Boundary (CURB). Parcel 144-0-110-445 has a City of Oxnard General Plan Designation of 'School'. The southern campus expansion area is immediately contiguous with the City of Oxnard's City Limit, which runs along the northern edge of Collins Street.

The existing main campus of the RDV campus is located within the City's Sphere of Influence and City Urban Restriction Boundary (CURB) and has a City of Oxnard General Plan Designation of 'School'. The northern campus expansion area is not located within the City's Sphere of Influence or CURB and is not part of the modified project, remaining within unincorporated Ventura County (see Section 1 Introduction). The southern campus expansion area is immediately contiguous with the City of Oxnard's City Limit, which runs along the northern edge of Collins Street, but is not within the City's Sphere of Influence or CURB. The modified project proposes annexation of the existing main campus and the southern campus expansion area into the City of Oxnard, consistent with the October 2023 Settlement Agreement, to obtain City water and sewer services and align with City land use policies, including the SOAR Ordinance (see Section 5.2 Agricultural and Forest Resources for agricultural impacts and mitigation).

### **Section 5.13 Noise**

- **The following text was added to page 44, paragraph 2.**

There are no changes represented in the modified project that would change the noise analysis conducted in the FEIR. The operational noise analysis includes impacts from joint use activities at the RDV Sports Complex, including youth sports groups such as Oxnard Youth Baseball, Oxnard Youth Soccer, and Rio Area community youth sports groups, as well as other community events. These activities, which may generate crowd noise or occasional amplified sound (e.g., from public address systems during games), are scheduled primarily after 6:00 p.m. on weekdays and on weekends, as specified in the Joint Use Agreement (see Appendix E), minimizing overlap with peak school hours and reducing impacts on nearby sensitive receptors. The noise analysis accounts for these activities, confirming that their noise levels will remain within City of Oxnard noise standards and are mitigated by the project's design features, such as setback distances and existing vegetation (see Section 5.17 for related transportation analysis).

### **Section 5.17 Transportation**

- **The following changes and additions were made to the Transportation section under the heading on page 47.**

#### **Updated Traffic and Circulation Study**

An updated Traffic and Circulation Study was prepared by Stantec for the modified project (Stantec 2024a). The updated Traffic and Circulation Study is included in Appendix C of this SEIR. The following is a brief summary of the traffic analysis for the various traffic analysis scenarios. The updated Traffic and Circulation Study (Appendix C) evaluates the impacts of joint use activities at the RDV Sports Complex, including youth sports by groups like Oxnard Youth Baseball, Oxnard Youth Soccer, and Rio Area community youth sports, primarily utilizing Parking Lot A. The study confirms that the proposed 150 parking spaces (Figure 1) adequately accommodate parking demand, traffic flow, and circulation during peak usage, such as youth sports events, without significant transportation impacts. These activities, scheduled outside school hours (typically after 6:00 p.m. on weekdays and on weekends per the Joint Use Agreement, Appendix E), minimize conflicts with school operations. The analysis, based on observed usage patterns and event schedules, integrates existing and projected traffic and parking scenarios,

ensuring sufficient capacity for both school and community uses without notable impacts during peak school-related traffic periods.

#### Existing Roadway and Intersection Operations

Table 2 of the updated Traffic and Circulation Study indicates that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue operates in the LOS A range under existing conditions. Table 3 indicates that the nine study-area intersections operate in the LOS A-C range except the Auto Center Drive/Collins Street intersection, which operates below the City of Oxnard LOS C standard (Stantec 2024a). The Stantec Updated Traffic and Circulation Study (2024, Appendix C) analyzes traffic impacts based on counts from two roadway segments and nine intersections, including two serving the school's ingress/egress driveways. These counts capture all trips from the existing school site, including school activities and community joint use (e.g., Community Clinic, Sheriff's Department, and youth sports groups using the gym and fields).

The modified project includes Phase I-B enhancements at the signalized intersections of Rose Avenue/Walnut Drive and Rose Avenue/Collins Street to improve traffic flow and safety (Figure 2). To meet City of Oxnard requirements, the RSD ensures signal timing adheres to City standards and the California Manual on Uniform Traffic Control Devices (CAMUTCD), incorporating minimum green times for bicycles, Walk/Don't Walk intervals, and yellow intervals. Signal calculation worksheets have been submitted to City staff for review (Stantec 2024, Appendix C). RSD will fund these improvements at its sole cost, with details to be finalized through the City's Development Application Conditions (DAC) process, separate from CEQA mitigation (Stantec 2024, Appendix C).

Additionally, the modified project addresses the City's request to enhance the Auto Center Drive/Collins Street (Via Estrada) intersection for school buses and peak-hour traffic. The study indicates this intersection operates at LOS D under cumulative conditions without the project and does not meet CAMUTCD signal warrant criteria (e.g., Warrant 7 – Crash Experience with fewer than 5 crashes in 12 months, or volume-based warrants with 76 PM peak-hour trips). Stopping sight distance (300 feet at 40 mph) is satisfied, and collision data does not justify signalization. Per the City's recommendation (February 23, 2024), Phase I-B includes southbound left-turn restrictions via a raised median and signage, diverting up to 54 PM peak-hour trips to the Rose Avenue/Collins Street intersection, which operates acceptably with a restriped westbound approach (Stantec 2024, Table 12).

These improvements ensure compliance with City standards and applicable transportation policies, maintaining a less-than-significant transportation impact, as the project does not conflict with plans, policies, or safety standards, or degrade intersection performance (Stantec 2024, Appendix C).

#### Cumulative Roadway and Intersection Operations

Table 4 indicates that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range under cumulative conditions. Table 5 indicates that the nine study-area intersections would operate in the LOS A-C range under cumulative conditions, except the Auto Center Drive/Collins Street intersection, which would operate below the City of Oxnard LOS C standard (Stantec 2024a).

#### Cumulative plus Project Roadway and Intersection Operations

Table 8 indicates that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range under cumulative plus project conditions. Table 9 indicates that the nine study-area intersections would operate in the LOS A-C range under cumulative plus project conditions, except the Auto Center Drive/Collins Street intersection, which would operate below the City of Oxnard LOS C standard (Stantec 2024a).

To meet the City of Oxnard's requirements for the modified project, the RSD will address conflicts between power lines and traffic signal equipment at the Rose Avenue/Walnut Drive, Rose Avenue/Collins Street, and Auto Center Drive/Collins Street intersections. RSD will coordinate with Southern California Edison (SCE) to underground power lines and communication cables along the school boundary, including crossing lines, in Phase I-B (Figure 2). This enables the installation of safety lights on signal poles and eliminates wires that could obscure traffic signal

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indicators, aligning with City standards. These improvements, categorized as DAC, will be detailed in RSD's response to the City's DAC comments, separate from CEQA mitigation requirements.

Additionally, RSD will enhance pedestrian crossings at the signalized intersections of Rose Avenue/Walnut Drive and Rose Avenue/Collins Street, incorporating the City's standard crosswalk design with ADA-compliant curb ramps, high-visibility striping, and countdown pedestrian signal heads, as shown in the Project Site Plan (Figure 1) and implemented in Phase I-B (Figure 2). Signal calculation worksheets submitted to City staff confirm compliance with City of Oxnard standards and the CAMUTCD (Appendix C).

The Updated Traffic and Circulation Study (Appendix C) verifies that these enhancements maintain a less-than-significant transportation impact, as the modified project complies with applicable transportation plans, policies, and safety standards without degrading intersection performance.

These improvements, considered Development Application Conditions (DAC) by the City, are detailed in RSD's response to the City's DAC comments, separate from CEQA mitigation requirements.

### **Section 5.17 Transportation**

- **The following changes and additions were made to the Transportation section under the heading on page 50.**

Rose Avenue/Walnut Drive intersection.

The Stantec Updated Traffic and Circulation Study (Stantec 2024, Appendix C) evaluated traffic impacts at the Rose Avenue/Walnut Drive intersection, finding no significant impacts based on CEQA criteria (XVII. Transportation a. through d.). Several general countermeasures have been identified by the County for this intersection, including installation of retroreflective backplates, a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement and replacing the green ball of the signal face for the No.1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times, including ADA improvements and installation of a pedestrian push button post on the northeast corner. The City of Oxnard noted that Exhibit 3 (page 7) of the updated traffic study incorrectly depicts the southbound approach at Rose Avenue/Walnut Drive as having three lanes, including a separate right-turn lane, when the existing configuration includes only two lanes with a shared through/right-turn lane. This graphical error in Exhibit 3 does not affect the study's analysis or operational findings, which correctly assume the two-lane southbound configuration. The analysis confirms that the modified project does not degrade the intersection's level of service or conflict with applicable transportation plans, policies, or safety standards, resulting in a less-than-significant impact. Exhibit 3 will be corrected in the Final SEIR to accurately reflect the two-lane southbound configuration (Stantec 2024, Appendix C).

~~Several general countermeasures have been identified by the County for the Rose Avenue/Walnut Drive intersection, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left turn signal head for the northbound left turn movement and replacing the green ball of the signal face for the no.1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times, including ADA improvements and installation of pedestrian push button post on the northeast corner.~~

School TMP. It is recommended that the District develop a school traffic management plan (TMP) to document and implement measures to promote travel mode shifts, optimize on-site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed humps). The modified project, located within the southern campus expansion area, includes a bus turnaround, drop-off area, and Parking Lot A, designed

to optimize on-site traffic flow and minimize impacts on adjacent public streets, such as Rose Avenue and Collins Street (Figure 1). To address the City of Oxnard's concerns, the RSD incorporated a school bus turning analysis using AutoTURN software into the site plan design, verifying that the turnaround accommodates standard school bus turning radii for safe and efficient on-site maneuvering without affecting public streets (Stantec 2024, Appendix C).

To enhance traffic operation and storage, RSD modified the drop-off area and Parking Lot A ingress design as follows: (1) reducing the drop-off ingress to one lane from two; (2) prohibiting entry to Parking Lot A from the drop-off ingress; (3) designating a third lane to guide drivers to Parking Lot A; and (4) restricting Parking Lot A traffic to southbound flow. These changes, reflected in the Project Site Plan (Figure 1), improve vehicle circulation, increase storage capacity, and reduce ingress congestion. Additionally, a raised median along Rose Avenue, implemented in Phase I-B (Figure 2), prevents southbound entry into the drop-off ingress, directing traffic to designated entry points and enhancing safety and flow, as analyzed in the Stantec Updated Traffic and Circulation Study (Appendix C).

RSD commits to managing the drop-off area along Rose Avenue during all operational times to ensure safe and efficient traffic flow for students, parents, and staff, as part of Phase I-B (Figure 2). This aligns with the school's Traffic Management Plan (TMP) recommended in the Stantec study, which includes measures like speed humps, traffic control, education, and travel mode shift promotion to optimize circulation and safety (Appendix C).

For pedestrian safety, RSD will enhance crossings at the north leg of Rose Avenue/Walnut Drive and Rose Avenue/Collins Street intersections, designing them perpendicular to the curb to minimize crossing distance and lead directly to the student walkway, as shown in the conceptual plan (Figure 1) and implemented in Phase I-B (Figure 2). Additionally, a sidewalk along the westerly side of Rose Avenue between Auto Center Drive and Collins Street, meeting City standards for major arterials, will be integrated with Rose Avenue and complement off-site improvements like curb, gutter, sidewalk, and bike lane enhancements along Rose Avenue and Collins Street (Figures 1 and 2).

These improvements, categorized as DAC by the City, will be detailed in RSD's response to the City's DAC comments, separate from CEQA mitigation requirements. The Stantec Updated Traffic and Circulation Study (Appendix C) confirms that the bus turnaround, drop-off enhancements, pedestrian crossings, sidewalk, and related measures maintain a less-than-significant transportation impact, as the modified project complies with applicable transportation plans, policies, and safety standards without degrading on-site or adjacent street operations, pedestrian access, or intersection performance.

### **Section 5.17 Transportation**

- **The following changes and additions were made to the Transportation section under the heading on page 52.**

An updated VMT analysis was prepared by Stantec for the modified project (Stantec 2024b). The updated VMT analysis is included in Appendix C of this SEIR. ~~The school portion of the modified project is the dominant use and meets the locally serving screening criteria; therefore, the modified project is presumed to have a less than significant impact at the project level. Furthermore, the DTPF portion of the modified project would also be less than significant on a stand-alone basis based on both the small project screening criteria and the locally serving screening criteria. Since the modified project would have a less than significant impact at the project level, the modified project would have a less than significant impact at the cumulative level per OPR's Technical Advisory. The modified project was also determined to be consistent with regional plans and to not impact active transportation or transit use.~~ Appendix C includes the Stantec Updated Traffic and Circulation Study (Stantec 2024), which incorporates signal calculation worksheets for Rose Avenue/Walnut Drive and Rose Avenue/Collins Street, supporting signal timing, necessary intersection enhancements, and pedestrian crossing designs, using the City of Oxnard's signal timing basic parameters and CAMUTCD standards, analysis of the Auto Center Drive/Collins Street intersection, including median restriction impacts, turning restrictions for the drop-off ingress along Rose Avenue, a

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recommended school TMP to optimize circulation and safety, and analysis of traffic calming measures such as speed humps near the drop-off area.

### **Section 5.19 Utilities and Service Systems**

- **The following changes and additions were made to the Utilities and Service Systems section on page 54.**

The existing main campus and southern campus expansion area require annexation to the Metropolitan Water District of Southern California (Metropolitan (MET)) and Calleguas Municipal Water District (Calleguas), with the approval of the Ventura Local Agency Formation Commission (LAFCO,) to obtain potable water service from the City of Oxnard. This Final SEIR documents the annexation process, which includes compliance with Metropolitan's water standby charges and conditions under Administrative Code Sections 3100, 3104(b), and 4509. The RSD will coordinate with Metropolitan to facilitate annexation, ensuring sufficient water supply for the project's operational needs, including joint use activities at the RDV Sports Complex and community facilities (see Section 3). The Water Demand Technical Memorandum (See Appendix B) confirms adequate capacity in the City of Oxnard's water system to serve the project, with no significant impacts on water supply infrastructure.

The existing main campus is connected to the City of Oxnard's sewer system via a sewer main in Rose Avenue. New buildings in the southern campus expansion area will be served through a new sewer connection in Collins Street. City standards consider an 8" pipe at capacity when half full (50% capacity). The Sewer Analysis (Jensen Design & Survey 2024c, Appendix B) modeled the proposed connection, assuming full buildout of vacant downstream land per City of Oxnard Public Works requirements and found the pipe would be 14% full with the additional sewage from the RDV campus expansion. This indicates sufficient capacity in the immediate public sanitary sewer system, resulting in a less-than-significant impact on the City's sewer system. To address potential impacts on the downstream trunk line and ensure no reduction in capacity reserved for other developable lands within city limits discharging to the same trunk, a Downstream Sewer Analysis Report (Jensen Design & Survey, December 1, 2023, Appendix B) was submitted to the City, evaluating downstream flows and capacity. Additionally, the RSD is obtaining an encroachment permit to install monitoring equipment in Rice Avenue, as outlined in a May 30, 2024, letter from Tai Chau (City of Oxnard Public Works). Sewer monitoring, scheduled to begin May 6, 2025, and run for two weeks, will collect data on downstream flows at locations specified in the monitoring plan (Jensen Design & Survey 2024c, Appendix B), supplemented by previously submitted sewer buildout calculations and an exhibit. These results will be submitted to the City to determine any future impacts and necessary improvements. The RSD will implement downstream improvements as directed by the City Engineer, based on the Public Works Sewer Modeling, the 2023 Downstream Sewer Analysis Report, and monitoring results, to maintain system performance and accommodate existing and planned development (Jensen Design & Survey 2024c, Appendix B).

The existing main campus is already connected to the City Sewer in Rose Avenue. All the new buildings will be served through a new sewer connection in Collins Street. City standards consider an 8" pipe to be at capacity when it is half full. According to modeling done in the Sewer Analysis (Jensen Design & Survey 2024c, Appendix B), the proposed connection would result in the pipe being 14% full with the additional sewage from the RDV campus expansion. This is well below City standards and would not cause a significant impact on the City sewer system.

### **Section 5.19 Utilities and Service Systems**

- **The following changes and additions were made to the Utilities and Service Systems section on page 56.**

The RDV Middle School Campus Expansion Project incorporates water conservation measures to minimize water demand, including water-efficient fixtures (e.g., low-flow faucets, toilets, and urinals), drought-tolerant landscaping along Rose Avenue and Collins Street frontages, and the use of reclaimed water where feasible for irrigation of recreational fields and landscaping. These measures align with the City of Oxnard's water conservation standards and Metropolitan's recommendations. This Final SEIR evaluates additional opportunities for reclaimed water integration, such as connecting to the City of Oxnard's reclaimed water system for non-potable uses, and other

strategies, including smart irrigation controllers and native plantings, to offset increased water demand from the project's expanded facilities and joint use activities (e.g., RDV Sports Complex). The Water Demand Technical Memorandum (Jensen Design & Survey 2024a, Appendix B) confirms that these conservation measures, combined with the City's water supply capacity, result in a less-than-significant impact on water resources.

The modified project includes construction of an existing RDV campus, utilized for educational purposes; no significant increase in utilization of utilities and services beyond what was addressed in the FEIR is proposed. The utilities analysis accounts for demands from joint use activities, including youth sports groups such as Oxnard Youth Baseball, Oxnard Youth Soccer, and Rio Area community youth sports groups utilizing Parking Lot A and the RDV Sports Complex. Water, wastewater, and energy demands associated with these activities, supported by the 150 parking spaces in Parking Lot A (Figure 1), are included in the modified project's utility projections. The analysis confirms that these joint use activities do not result in significant utility impacts, as their demands are integrated into the modified project's utility requirements and infrastructure planning. As such, the modified project would not result in the need for new or expanded water, natural gas, or telecommunications facilities. In addition, improvements to the existing buildings would not require significant relocation of water, electric power, natural gas, or telecommunications facilities.

### **Section 5.21 Mandatory Findings of Significance**

- **The following changes and additions were made to the Utilities and Service Systems section on page 56.**

The previously adopted mitigation measures presented in the FEIR extend to the modified project presented herein and are included as conditions of the SEIR approval, and the District is responsible for ensuring specific implementation. In order to further reduce the impacts associated with farmland conversion of the ~~11.3~~ 8.7 acres of the southern campus expansion area actively used for agricultural production, Mitigation Measure AG-3 has been added to the SEIR. The northern campus expansion area (10 acres) is not part of the modified project, as stated in Section 1 Introduction, with no associated mitigation measures (see Section 1), therefore AG-2 has been removed.

## **3.2.6 Changes and Errata to Section 7.0 References**

### **Section 7.0 References**

- **The following references were added to Section 7.0.**

Anselm, Arne. 2025. Letter regarding Fox Canyon Groundwater Management Agency Groundwater Sustainability Plan requirements. February 4

Chau, Tai. 2024. Letter regarding sewer monitoring requirements for Rio Del Valle Middle School Expansion Project. City of Oxnard Public Works. May 30.

Chau, Tai. 2025. Meeting regarding stormwater detention requirements for Rio Del Valle Middle School Expansion Project. City of Oxnard Public Works. March 6.

## **3.2.7 Changes and Revisions to Technical Reports and Appendices**

### **Appendix B: Updated Water Resources System Reports**

- **The Preliminary Drainage Report was added in response to comment letter 1.**
- **The Downstream Sewer Analysis was added in response to comment letter 1.**

### **Appendix C: Updated Traffic and Circulation Study and VMT Analysis**

- **The Traffic and Circulation Study was revised in response to comment letter 1.**

## APPENDICES

### APPENDIX A: MITIGATION MONITORING AND REPORTING PROGRAM

**MITIGATION MONITORING AND REPORTING PROGRAM  
RIO DEL VALLE MIDDLE SCHOOL EXPANSION PROJECT  
RIO SCHOOL DISTRICT  
OXNARD, CA**

| <b>Mitigation Measure</b>                 | <b>Requirements of Measure</b>                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Time Frame</b>                                              | <b>Responsible Party</b> | <b>Completed</b> | <b>Initials and Date</b> | <b>Notes/Comments</b> |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|--------------------------|------------------|--------------------------|-----------------------|
| <b>Agriculture and Forestry Resources</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                |                          |                  |                          |                       |
| <b>AG-1</b>                               | 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. for Site improvements.                                                                                  | Prior To Construction                                          | RSD                      |                  |                          |                       |
| <b>AG-2</b>                               | <del>The District will commit to retaining the agricultural use of the northern campus expansion area for a minimum of 10 years. If after 10 years, the land uses on the adjacent off-site properties to the north and the east of the northern campus expansion area are no longer agricultural, the District will re-evaluate the compatibility of retaining the agricultural use of the northern campus expansion area.</del> | <del>Prior To Construction and For a Minimum of 10 years</del> | <del>RSD</del>           |                  |                          |                       |
| <b>AG-3</b>                               | The District shall pay an agricultural conservation in-lieu fee to the City of Oxnard. The final fee amount shall be determined by the RSD and the City of Oxnard. The funds shall be used for land acquisition (land or structure), refurbishment, and/or                                                                                                                                                                       | Prior To Annexation of Main Campus and Southern Campus         | RSD                      |                  |                          |                       |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Time Frame          | Responsible Party | Completed | Initials and Date | Notes/Comments |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-------------------|-----------|-------------------|----------------|
|                    | 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. The final fee amount shall be determined and the payment of the fee to the City of Oxnard shall be made prior to annexation of the proposed project site (main campus and southern campus expansion areas).                                                                                                                                                                                                                                                                                                                                | Expansion Areas     |                   |           |                   |                |
| <b>Air Quality</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                     |                   |           |                   |                |
| <b>AQ-1</b>        | <p>In accordance with standard practice pursuant to the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations during project construction the contractor shall ensure that:</p> <ul style="list-style-type: none"> <li>• All soil excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed soil areas. Watering shall be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations.</li> <li>• All clearing, earth moving, and excavation activities shall cease during periods of winds greater than 20 miles per hour (mph) (averaged over one hour), if disturbed material</li> </ul> | During Construction | RSD (Contractor)  |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Time Frame | Responsible Party | Completed | Initials and Date | Notes/Comments |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------------------|-----------|-------------------|----------------|
|                    | <p>is easily windblown, or when dust plumes of 20% or greater opacity impact public roads, occupied structures, or neighboring property.</p> <ul style="list-style-type: none"> <li>• All fine material transported off-Site shall be either sufficiently watered or securely covered to prevent excessive dust.</li> <li>• All haul trucks shall be required to exit the Site via an access point where a gravel pad or grizzly has been installed.</li> <li>• Stockpiles of soil or other fine loose material shall be stabilized by watering or other appropriate method to prevent wind-blown fugitive dust.</li> <li>• Once initial leveling has ceased, all inactive soil areas within the construction Site shall either be seeded and watered until plant growth is evident, treated with a dust palliative, or watered twice daily until soil has sufficiently crusted to prevent fugitive dust emission.</li> <li>• On-Site vehicle speed should be limited to 15 mph.</li> <li>• All areas with vehicle traffic should be paved, treated with dust palliatives or watered a minimum of twice daily.</li> </ul> |            |                   |           |                   |                |

| Mitigation Measure          | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Time Frame            | Responsible Party            | Completed | Initials and Date | Notes/Comments |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------------|-----------|-------------------|----------------|
|                             | <ul style="list-style-type: none"> <li>Properly maintain and tune all internal combustion engine powered equipment.</li> <li>Require employees and subcontractors to comply with the CARB idling restrictions for compression ignition engines; and use California ultra-low sulfur diesel fuel; use construction equipment with Tier 4 engines; and use interior and exterior paint with a VOC content of 50 grams per liter.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                  |                       |                              |           |                   |                |
| <b>Biological Resources</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                       |                              |           |                   |                |
| <b>BIO-1</b>                | A preconstruction nesting bird survey shall be conducted by a qualified biologist prior to tree removal, the use of heavy machinery, or significant ground disturbance if activities are to be conducted within the bird nesting season (February 15 – September 15). The survey shall be required within 72 hours prior to the commencement of construction activities if they occur in the bird nesting season. The survey shall occur within the Site and a 250-foot buffer area around the Site, access permitting, which will include any adjacent trees. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. If birds are found to be actively nesting within | Prior To Construction | RSD (Biologist / Contractor) |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Time Frame            | Responsible Party            | Completed | Initials and Date | Notes/Comments |
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|                    | 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 <b>biological monitoring no longer be needed.</b> |                       |                              |           |                   |                |
| <b>BIO-2</b>       | A preconstruction survey for burrows and burrowing owl shall be conducted by a qualified biologist prior to the use of heavy machinery and/or significant ground disturbance associated with construction activities. The survey shall be required within 5 days prior to the commencement of construction activities and shall occur within the Site and a 150-foot buffer area around the Site, access permitting. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities.                                                                                                                               | Prior To Construction | RSD (Biologist / Contractor) |           |                   |                |

| Mitigation Measure        | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Time Frame            | Responsible Party                                 | Completed | Initials and Date | Notes/Comments |
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|                           | 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 <i>CDFW Staff Report on Burrowing Owl Mitigation, 2012</i> (CDFW 2012). If burrowing owls are detected within the project Site or within the 150-foot project Site buffer, no construction work can occur, and the CDFW shall be contacted immediately to develop and implement a mitigation plan to protect burrowing owls and their nest sites. The burrowing owl survey can be conducted in conjunction with the nesting bird survey, if timing is appropriate. |                       |                                                   |           |                   |                |
| 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | During Construction   | RSD (Contractor)                                  |           |                   |                |
| <b>Cultural Resources</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                       |                                                   |           |                   |                |
| CUL-1                     | <b>Built Environment:</b> 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Prior To Construction | RSD (Contractor/ Project Architectural Historian) |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Time Frame                       | Responsible Party                        | Completed | Initials and Date | Notes/Comments |
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|                    | buildings and infrastructure, and the existing residential building at 2600 Rose Avenue, Oxnard, California.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                  |                                          |           |                   |                |
| <b>CUL-2</b>       | <b>Cultural Resource Worker Environmental Awareness Training:</b> 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 | Prior To and During Construction | RSD (Contractor / Project Archaeologist) |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Time Frame            | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                    | regarding the tribal cultural resources within the region.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                       |                   |           |                   |                |
| <b>CUL-3</b>       | <b>Inadvertent Discovery Plan:</b> 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 | Prior to Construction | RSD (Contractor)  |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Time Frame | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                    | <p>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</p> |            |                   |           |                   |                |

| Mitigation Measure       | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Time Frame            | Responsible Party                                 | Completed | Initials and Date | Notes/Comments |
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|                          | 7050.5, the coroner will contact the NAHC by telephone within 24 hours.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                       |                                                   |           |                   |                |
| <b>CUL-4</b>             | <b>Historical Resources Protection.</b> If either or both residences evaluated for eligibility in CUL-1 meet the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, §5024.1, Title 14 CCR, Section 14 CCR, Section 4852) and the Project with an effect that may cause a substantial adverse change in the historical significance of either or both residences, RSD shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. RSD shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures as per Cal. Code Regs. tit. 14 § 15064.5. | Prior to Construction | RSD (Contractor/ Project Architectural Historian) |           |                   |                |
| <b>Geology and Soils</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                       |                                                   |           |                   |                |
| <b>GEO-1</b>             | 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                                                                                                                                                                                                                                                                  | Prior To Construction | RSD                                               |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Time Frame                       | Responsible Party                 | Completed | Initials and Date | Notes/Comments |
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|                    | accordance with either Equation (12.8-3) for $TL \geq T > 1.5 T_s$ or Equation (12.8-4) for $T > TL$ . The Site-specific ground motion hazard analysis and geotechnical building design recommendations shall be approved by the CGS and the DSA.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                  |                                   |           |                   |                |
| <b>GEO-2</b>       | 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.                                                                                                                                                                                                                                                                                                                                                           | Prior To Construction            | RSD (Contractor)                  |           |                   |                |
| <b>GEO-3</b>       | <b>Paleontological Resource Impact Mitigation Program.</b> Prior to any ground-disturbing activities, a Paleontological Resource Impact Mitigation Program (PRIMP) shall be prepared by a qualified paleontologist if 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 | Prior To and During Construction | RSD (Contractor / Paleontologist) |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Time Frame | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                    | <p>PRIMP at the beginning of ground disturbing activities. The PRIMP will address and define the following specific activities and responsibilities:</p> <ul style="list-style-type: none"> <li>• Full-time monitoring by a qualified paleontologist during all grading and excavation extending more than 10 feet bgs or beyond Holocene deposits.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Procedures for handling collected material and curation.</li> </ul> |            |                   |           |                   |                |

| Mitigation Measure                     | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Time Frame                       | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                                        | <ul style="list-style-type: none"> <li>Procedures for reporting and documenting the results of the monitoring program.</li> <li>Provide brochure of environmental awareness training.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                  |                   |           |                   |                |
| <b>Hazards and Hazardous Materials</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                  |                   |           |                   |                |
| <b>HAZ-1</b>                           | 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.                                                                                                                                                                                                                                                                                                                                                                                                                        | During Construction              | RSD               |           |                   |                |
| <b>HAZ-2</b>                           | 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 | Prior To and During Construction | RSD               |           |                   |                |

| Mitigation Measure                 | Requirements of Measure                                                                                                                                                                                                                                                                                                                               | Time Frame                                                     | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                                    | 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.                                                           |                                                                |                   |           |                   |                |
| <del>HAZ-3</del>                   | <del>If the 10-acre northern campus expansion area land use changes to something other than agricultural production, the Phase I ESA Report, Phase II ESA Report, and Phase II ESA Addendum Report should be submitted to DTSC for review to determine if any further action is required.</del>                                                       | <del>Prior To Construction and For a Minimum of 10 years</del> | <del>RSD</del>    |           |                   |                |
| <b>Hydrology and Water Quality</b> |                                                                                                                                                                                                                                                                                                                                                       |                                                                |                   |           |                   |                |
| <b>HYDRO-1</b>                     | 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.                                                                                                                                                   | During Construction                                            | RSD (Contractor)  |           |                   |                |
| <b>HYDRO-2</b>                     | The proposed project shall meet its City of Oxnard Water Neutrality Policy requirements by completing at least one of the following: <ul style="list-style-type: none"> <li>• Transfer of existing FCGMA groundwater allocations to the City;</li> <li>• Contributing to increased efficiency by funding City water conservation programs;</li> </ul> | Prior To and During Construction                               | RSD               |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Time Frame          | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                    | <ul style="list-style-type: none"> <li>Funding recycled water retrofit projects; or</li> <li>Providing additional water supplies.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                     |                   |           |                   |                |
| <b>HYDRO-3</b>     | The RSD shall develop and implement a Site evacuation plan to be implemented in conjunction with the County of Ventura OES Dam Failure Response Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Prior To Operation  | RSD               |           |                   |                |
| <b>Noise</b>       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                     |                   |           |                   |                |
| <b>N-1</b>         | <p>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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>Stationary noise sources shall be located as far from adjacent</li> </ul> | During Construction | RSD (Contractor)  |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Time Frame | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                    | <p>receptors as possible and shall be muffled and enclosed within temporary sheds, incorporate insulation barriers or other measures to the extent feasible.</p> <ul style="list-style-type: none"> <li>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.</li> <li>Heavy construction equipment operations should be limited during the school period when classrooms are being utilized in the adjacent middle school buildings.</li> </ul> |            |                   |           |                   |                |

| Mitigation Measure    | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Time Frame            | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                       | <ul style="list-style-type: none"> <li>When heavy construction activities are located within 75 feet of a residential structure, deploy a temporary portable sound barrier between the construction activities and nearest sensitive receptor.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |                   |           |                   |                |
| <b>Transportation</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                       |                   |           |                   |                |
| <b>TRAF-1</b>         | <b>School Traffic Management Plan (TMP).</b> 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).                                                                                                                                                                                                                                                                                                                                                                                                                                              | Prior to Construction | RSD               |           |                   |                |
| <b>TRAF-2</b>         | <b>Rose Avenue/Walnut Drive Intersection.</b> 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 | Prior to Construction | RSD               |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Time Frame            | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                    | 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             | <b>Auto Center Drive/Collins Street Intersection (Project-Specific and Cumulative).</b> 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 | Prior to Construction | RSD               |           |                   |                |

| Mitigation Measure                   | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Time Frame                       | Responsible Party                        | Completed | Initials and Date | Notes/Comments |
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|                                      | would not satisfy traffic signal warrants under cumulative plus project conditions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                  |                                          |           |                   |                |
| <b>Tribal and Cultural Resources</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                  |                                          |           |                   |                |
| <b>CUL-2</b>                         | <b>Cultural Resource Worker Environmental Awareness Training:</b> 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 | Prior To and During Construction | RSD (Contractor / Project Archaeologist) |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Time Frame            | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                    | regarding the tribal cultural resources within the region.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                       |                   |           |                   |                |
| <b>CUL-3</b>       | <b>Inadvertent Discovery Plan:</b> 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 | Prior to Construction | RSD (Contractor)  |           |                   |                |

| Mitigation Measure | Requirements of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Time Frame | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                    | <p>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</p> |            |                   |           |                   |                |

| Mitigation Measure                   | Requirements of Measure                                                                                                                                                                                                                                                                                                                     | Time Frame            | Responsible Party | Completed | Initials and Date | Notes/Comments |
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|                                      | 7050.5, the coroner will contact the NAHC by telephone within 24 hours.                                                                                                                                                                                                                                                                     |                       |                   |           |                   |                |
| <b>Utilities and Service Systems</b> |                                                                                                                                                                                                                                                                                                                                             |                       |                   |           |                   |                |
| <b>UTIL-1</b>                        | 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. | Prior To Construction | RSD               |           |                   |                |

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