Final 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 EIR

Prepared for:

Rio School District
1800 Solar Drive
Oxnard, California 93030

Prepared by:

Tetra Tech
5383 Hollister Avenue, Suite 130
Santa Barbara, California 93111

January 16, 2023

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APPENDICES

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_4	Methane
CHP	California Highway Patrol
CIE	International Commission on Illumination
CIP	Capital Improvement Program
CIWMP	County Integrated Waste Management Plan
City	City of Oxnard
CMA	Congestion Management Authority
CMP	Congestion Management Program
CMWD	Calleguas Municipal Water District
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COPC	Chemical of Potential Concern
COS	Conservation and Open Space
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^2	square foot
FTA	Federal Transit Administration
GDE	groundwater dependent ecosystem
GHG	greenhouse gas
GPA	General Plan Amendment
GPCD	gallons per capita per day
gpm	gallons per minute
GREAT	Groundwater Recovery Enhancement and Treatment
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWP	global warming potential
GYM	RDV Gymnasium
H_2S	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
µg	microgram
$\mu g/m^3$	micrograms per cubic meter
mg	milligram
MGD	million gallons per day
mg/kg	milligrams per kilogram
mg/m^3	milligrams per cubic meter
ML	Richter local magnitude
MLD	Most Likely Descendant
$MMTCO_2e$	million metric tons of CO_2 equivalent
mph	miles per hour
MPO	Metropolitan Planning Organization
MPSP	Master Plans, Strategies, and Programs
MRF	material recovery r 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
$MTCO_2e$	metric tons of CO_2-equivalent
MWD	Metropolitan Water District
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality standards
NAHC	Native American Heritage Commission
NAS	Naval Air Station
NAT	Native American Tribe
NBVC	Navy Base Ventura County
NPS	National Park Service
NECSP	Northeast Community Specific Plan
NFA	No Further Action
NF_3	nitrogen triflouride
NFIP	National Flood Insurance Program
NHM	Natural History Museum
NI	No Impact
NO_2	nitrogen dioxide
NOA	Notice of Availability
NOE	Notice of Exemption
NOI	Notice of Intent
NOP	Notice of Preparation
NOT	Notice of Termination
NO_x	nitrogen oxides (nitrogen oxide and nitrogen dioxide)
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
O_3	ozone
OCP	organochlorine pesticide
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
O-H	Oxnard-Hueneme
OHP	Office of Historic Preservation
OMC	Oxnard Municipal Code
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
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PM_{10}	particulate matter less than 10 microns in diameter
POTW	publicly owned treatment works
ppb	parts per billion
ppm	parts per million
PRC	Public Resources Code
PRIMP	Paleontological Resource Impact Mitigation Program
R1PD	Single Family Residential Planned Development
RCRA	Resources Conservation and Recovery Act
RDR	Regulation and Development Review
RDV	Rio del Valle Middle School
REC	Recognized Environmental Concern
RHNA	Regional Housing Needs Assessment
RLM	Residential Low Medium
RMA	Resource Management Agency
ROW	Right-of-Way
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_1	1-second period
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SB18	State Senate Bill 18
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCC	South Central Coast
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCH	School
SCR-1	Santa Clara River Levee
SCS	Sustainable Community Strategy
SD	State Delisted; Storm Drain
SDS	Safety Data Sheet
SDWA	Safe Drinking Water Act
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SGMP	Sustainable Groundwater Management Plan
SHMA	Seismic Hazard Mapping Act
SIP	State Implementation Plan
SLF	sacred lands file
SMGB	State Mining and Geology Board
SO_2	sulfur dioxide
SO_4	sulfates
SOAR	Save Open Space and Agricultural Resources
SOI	Sphere of Influence

Acronyms/Abbreviations	Definition
SO_x	oxides of sulfur
sq. ft.	square feet
SRTS	Safe Routes to School
SSC	CDFW Species of Special Concern
SSI	Supplemental Site Investigation
SSIFSP	Supplemental Site Investigation Field Sampling Plan
SVLRC	Simi Valley Landfill & Recycling Center
SWP	State Water Project
SWPCP	Stormwater Pollution Control Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCS	Traffic and Circulation Study
TDS	total dissolved solids
TGM	Technical Guidance Manual
TMDL	Total Maximum Daily Load
TMP	traffic management plan
tpd	tons per day
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
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	waste discharge requirement
WIFIA	Water Infrastructure Finance and Innovation Act
WL	CDFW Watch List
WSCP	Water Shortage Contingency Plan
ZOI	Zone of Influence

1.0 INTRODUCTION

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

This Final Environmental Impact Report (Final EIR) has been prepared to describe the disposition of environmental issues raised in the comments received on the proposed project's Draft EIR (Final EIR Vol. II). Evaluating the potential impacts of the proposed project on the environment and responding to comments is an essential part of the environmental review process required under the California Environmental Quality Act (CEQA) (California Public Resources Code (PRC) § 21000 et seq.). This Final EIR has been completed in accordance with CEQA and the CEQA Guidelines (Title 14 of Section 15132 of the California Code of Regulations (CCR) (14CCR § 15132)).

1.1 FINAL EIR REQUIREMENTS

Table 1-1 identifies the required content of a Final EIR per Section 15132 of the CEQA Guidelines and where it can be located within this document.

Table 1-1 Final EIR Content

Required Final EIR Content Per Section 15132 of the CEQA Guidelines	Where it is located in this EIR
The Draft EIR or a revision of the draft.	Final EIR Volume II, Draft EIR
Comments and recommendations received on the Draft EIR either verbatim or in Summary.	Final EIR Volume I, Section 2.0, Comments and Response to Comments
A list of persons, organizations, and public agencies commenting on the Draft EIR.	Final EIR 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 EIR Volume I, Section 2.0, Comments and Response to Comments
Any other information added by the Lead Agency.	Final EIR Volume I, Section 3.0 Draft EIR Additions and Corrections and Final EIR Volume II with underline to indicate added text and strikeout to identify removed text.

Volume I of the Final EIR for the proposed project has been prepared to provide responses to comments received on the Draft EIR and is to be used in conjunction with, rather than in place of, the Draft EIR. The complete Draft EIR is included as Volume II of the Final EIR. Therefore, the information in this Final EIR, which incorporates the Draft EIR in Volume II, fulfills state CEQA requirements for a complete EIR.

The Final EIR provides revisions for clarification or amplification of information already in the record. 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 Draft EIR.

In compliance with CEQA Guidelines Section 15090, prior to approving the project the lead agency shall certify that:

- The Final EIR has been completed in compliance with CEQA;
- The Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- The Final EIR reflects the lead agency's independent judgement and analysis.

2.0 COMMENTS AND RESPONSE TO COMMENTS

This section includes written comments received on the Draft EIR and RSD's response to each comment received during the public review period. No verbal comments were received at the public meeting.

2.1 INTRODUCTION

The Draft EIR was circulated for public review and comment during a 45-day public review period beginning on October 7, 2022 and ending on November 21, 2022 at 5:00 p.m. The Draft EIR was circulated to numerous agencies having jurisdiction over resources that could be affected by the proposed project or having expertise or interest in environmental resources. A Notice of Completion was filed with State Clearinghouse on October 7, 2022. 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 October 7, 2022.

RSD held a public meeting for the proposed project on November 3, 2022, at 6:30 p.m. at the District Office Board Room located at 1800 Solar Drive, Oxnard, CA 93030. The purpose of the public meeting was to solicit and receive public comment regarding the Draft EIR. No verbal comments were received during the November 03, 2022 public meeting.

Six 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 EIR 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 EIR, and prepared a written response to all comments received during the noticed comment period.

Table 2-1 Comments Received on the Draft EIR

Comment Letter Number	Signatory	Date
	Agencies	
1	California Department of Transportation, District 7	11/17/2022
2	Ventura County Air Pollution Control District	10/31/2022
3	Ventura County Environmental Health Division	11/2/2022
4	Ventura County Public Works Watershed Planning and Permits Division	10/19/2022
5	Ventura County Planning Department	11/21/2022
6	City of Oxnard Community Development Department - Planning Division	11/21/2022

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.

2.3 RESPONSES TO COMMENTS

Letter 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 505-5003
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life

November 17, 2022

Wael Saleh, C.P.A., M.B.A
Rio School District
1800 Solar Drive
Oxnard, CA 93030

RE: Rio del Valle Middle School Existing Campus Expansion Master Plan
Draft Environmental Impact Report (DEIR) SCH # 2022060117
Vic. VEN-101/PM: 20.891
GTS # 07-VEN-2022-00516

Dear Wael Saleh:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The Rio School District proposes to implement the Rio del Valle Campus Enhancement Master Plan to meet the educational, recreational, and support facilities needs of District students. The proposed project includes development within the expanded campus, which would include options for: new classrooms, library and media center, multi-purposed building, transportation and parking facilities, recreational facilities including a 320-meter track, flag football field, six basketball courts, baseball field, softball field, physical education (P.E.) and lunch play field, four sand volleyball courts, two soccer fields, jogging path, an athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts. The State Water Resources Control Board is the Lead Agency under the California Environmental Quality Act (CEQA).

The project site is approximately half a mile from the North U.S. 101 ramp on N. Rose Avenue. After reviewing the DEIR, Caltrans has the following comments.

The City of Oxnard Public Works Division collects traffic impact fees based on project-generated traffic that would impact roadways within the City's jurisdiction. Standard conditions of permit issuance initiate collection of these fees for all projects within the City of Oxnard, regardless of whether the Project is private or public. The proposed Project will implement three mitigation measures: TRAF-1, TRAF-2, and TRAF-3. Would these mitigation measures be funded by the traffic impact fees?

Comment 1-1

The DEIR states that the Project could potentially result in a 250-student increase, approximately 30%. Evaluating the new driveways for the District Transportation and

Comment 1-2

"Provide a safe and reliable transportation network that serves all people and respects the environment."

Parking Facility and site access is recommended for adequate sight distance, sufficient internal queuing space, driveways serving the demand, and accommodating all peak hour trips. The purpose is so that the Project does not result in internal stacking that spills into nearby arterials and substantially affects operating conditions along Rose Avenue and Collins Street.

Comment 1-2 (cont.)

Although the site anticipates growth in vehicle trips from increased student population or operational uses, Caltrans concurs that transportation impacts, as well as VMT impacts, would be less than significant with the implementation of the mitigation measures.

Comment 1-3

The following information is included for your consideration. Any work completed on or near Caltrans' right of way may require an encroachment permit. However, the final determination on this will be made by Caltrans' Office of Permits. This work would require additional review and may be subject to additional requirements to ensure current design standards and access management elements are being addressed. For more information on encroachment permits, see: https://dot.ca.gov/programs/traffic-operations/ep.

Comment 1-4

If you have any questions, please feel free to contact Karen Herrera, the project coordinator, at Karen.Herrera@dot.ca.gov and refer to GTS # 07-VEN-2022-00516.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment."

Letter 1	Miya Edmonson, LDR/CEQA Branch Chief California Department of Transportation, District 7

Response to Comment 1-1

TRAF-1 (School Traffic Management Plan) would be developed and implemented by Rio School District. TRAF-2 (improvements to Rose Avenue/Walnut Drive intersection) is outside of City of Oxnard jurisdiction and would be coordinated with the County of Ventura. TRAF-3 (improvements to Auto Center Drive/Collins Street intersection) is not included in the City's CIP program and is anticipated to be funded by Rio School District.

Response to Comment 1-2

Review of adequate sight distance from school driveways will be completed during design and construction plan development. The intent of the proposed new school access and circulation plan is to significantly improve on-site queuing capacity and on-site circulation. TRAF-1 (School Traffic Management Plan) would further implement measures to promote travel mode shifts and optimize on-site circulation.

Response to Comment 1-3

Comment states that transportation and VMT impacts would be less than significant. Comment noted.

Response to Comment 1-4

Comment provides information on work in Caltrans right-of-way. No work in Caltrans right-of-way is expected to occur as part of the proposed project construction.

Ventura County
Air Pollution
Control District

4567 Telephone Rd
Ventura, California 93003

tel 805/303-4005
fax 805/456-7797
www.vcapcd.org

Ali Reza Ghasemi, PE
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

Memorandum

Letter 2

TO: Wael Saleh, Assistant Superintendent, Rio School District

DATE: October 31, 2022

FROM: Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division

SUBJECT: Draft Environmental Impact Report for the Rio Del Valley Middle School Expansion (RMA 22-014-1)

Air Pollution Control District (APCD) staff has reviewed the subject draft environmental impact report (EIR) of the project referenced above. The project location is 3100 Rose Avenue in the unincorporated area northeast of the City of Oxnard. The Lead Agency for the project is the Rio School District.

General Comments

Item 1- The mobile emissions calculated do not include any weekend trips as a result of proposed sports-related additions. According to the EIR, "opportunities for use of the recreational school facilities by the community outside of school hours is planned" (EIR, Page 2-11). However, the CalEEMod air emissions report for the operational activities only include trip information for weekdays (school hours), not weekends, such as sports events, etc. (EIR Appendices, PDF Page 159 of 3412). The operational air emissions must be re-calculated if the statement is correct as it could create new trips and new emissions into the region.

Comment 2-1

Item 2- An emission reduction measure of 100 g/L ROC was proposed under AQ-1 (last item) that would bring the emission to below recommended 25 g/L ROC (not for mitigation per APCD Air Quality Assessment Guidelines). The emissions presented in Table 3-11 for construction already include a 100 g/L ROC max for architectural coatings as shown in the CalEEMod model in the appendices. At 100 g/L ROC for architectural coatings, the ROC emissions max was calculated at 49.97 lbs./day ROC. We recommend MM AQ-1 change its ROC max to 50 g/L instead of 100 g/L to cut ROC emissions in half and below 25 lbs./day . We note 50 g/L ROC is already codified into APCD Rule 74.2, Architectural Coatings, for the general flats category.

Comment 2-2

Item 3- An emission reduction measure of using Tier 2 off-road construction equipment was proposed under AQ-1 (last item). However, the CalEEMod report has selected all construction equipment to be Tier 4-interim diesel engines and presented it as the construction emissions in Table 3-11 (EIR Appendices, PDF Page 141 of 3412). Without construction equipment being equipped with Tier-4 interim engines, the NOx emissions would be above 25 lbs./day NOx at 34.55 lbs./day (EIR Appendices, PDF Page 142 of 3412). Therefore, we recommend changing the

Comment 2-3

minimum required tier from Tier 2 to Tier 4 listed in MM AQ-1 and making sure it is an enforceable condition in its discretionary permit.

Comment 2-3 cont.

We'd like to remind the Lead Agency that the County of Ventura recently updated a new policy in its 2040 GPU to always require Tier 3 and Tier 4 diesel construction off-road equipment (New Policy HAZ-10.13). In addition, we recommend this due to the construction length and proximity to sensitive receptors, including children on-site. Although the toxic methodology from the state calculates based on a 30 or 70-yr lifespan, the first 2 years of development of newborns is extremely vulnerable as they have higher breathing rates and is captured within the construction length. Diesel particulate matter (DPM), a main constituent of construction equipment emissions, represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease.

Comment 2-4

Thank you for the opportunity to comment on the project. If you have any questions, you may contact me at nicole@vcapcd.org.

Letter 2	Nicole Collazo, Air Quality Specialist Ventura County Environmental Health Division

Response to Comment 2-1

Weekend use of facilities are not anticipated to change significantly from current operations as the existing sports structures are being geographically reorganized and do not necessarily represent new structures. The only sports structures that would be considered new to some extent are two soccer fields which are being clearly delineated as soccer fields. Thus, no new emissions are anticipated as a result of reorganization of sports structures. Additionally, the RSD, in order to accommodate the increasing student enrollment and associated demand on recreational fields, has processed field renovation plans and an associated parking facility replacement through the California Department of General Services, Division of the State Architect (DSA) on the existing main campus. These renovations are in progress and are slated for completion in fall 2022. As these renovations involve the repair, maintenance, and minor alteration of existing facilities; replacement or reconstruction of existing facilities; and the construction of small new and/or accessory structures, approved before this proposed project was under consideration, the RSD proceeded under a CEQA exemption for these renovations.

Response to Comment 2-2

To address this comment architectural emissions were recalculated using a 50 g/L ROC. Emissions results are included in Appendix B of the Final EIR.

Response to Comment 2-3

The updated CalEEMod calculations included in Appendix B of the Final EIR reflect the use of a Tier 4 engine.

Errata:

- The reference to “Tier 2 engines” under the Summary of Project Impacts, Mitigation Measures and Level of Impact After Mitigation Proposed Rio del Valle Middle School Existing Campus Expansion, County of Ventura, CA Rio School District, Section 3.3 Air Quality, page E-3, second bullet, should say “Tier 4 engines.”
- The reference to “Tier 2 engines” under Section 3.3.2.5, AQ-1, bullet 10, page 3-42, should say “Tier 4 engines.”

Response to Comment 2-4

The updated CalEEMod calculations included in Appendix B of the Final EIR reflect the use of a Tier 4 engine.

Errata:

- The reference to “Tier 2 engines” under the Summary of Project Impacts, Mitigation Measures and Level of Impact After Mitigation Proposed Rio del Valle Middle School Existing Campus Expansion, County of Ventura, CA Rio School District, Section 3.3 Air Quality, page E-3, second bullet, should say “Tier 4 engines.”
- The reference to “Tier 2 engines” under Section 3.3.2.5, AQ-1, bullet 10, page 3-42, should say “Tier 4 engines.”

COUNTY of VENTURA
RESOURCE MANAGEMENT AGENCY
CHARLES R. GENKEL
Environmental Health Director

November 2, 2022

Letter 3

Rio School District
ATTN: Wael Saleh, District Project Manager
1800 Solar Drive
Oxnard, CA 93030

Rio Del Valle Middle School Existing Campus Expansion Plan, Environmental Document Review – Draft Environmental Impact Report, (RMA REF # 22-014-1)

Ventura County Environmental Health Division (Division) staff reviewed the information submitted for the subject project.

The Division provides the following comments:

1. Project is currently in escrow to acquire the property south of the existing campus. This property is addressed as 2600 North Rose Avenue in Oxnard. This Division has records of an existing Onsite Wastewater Treatment System (OWTS) connected to the existing residential structure on the property. The proposed project will include annexation into the City of Oxnard and will connect this property to City of Oxnard sewer service. Ensure the existing OWTS is properly abandoned with approved permits from the appropriate jurisdiction at the time of abandonment.

If you have any questions, please contact me at (805) 654-2830 or Ashley.Kennedy@ventura.org.

Ashley Kennedy, R.E.H.S.
Land Use Section
Environmental Health Division

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HALL OF ADMINISTRATION #1730
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Letter 3	Ashley Kennedy, Land Use Section Ventura County Environmental Health Division

Response to Comment 3-1

The existing Onsite Wastewater Treatment System (OWTS) located at 2600 North Rose Avenue will be properly disconnected and abandoned per all applicable State, County of Ventura, and City of Oxnard building code regulations, including but not limited to County of Ventura Ordinance No. 4341, Section 4-6, Abandonment of Existing Sewage Disposal Facilities, "*After the effective date of this Ordinance, all existing private Sewage disposal systems, including, but not limited to, cesspools, septic systems, seepage pits, vaults, pit toilets, and privies shall be abandoned in the manner required by the Uniform Plumbing Code*." In addition, and as required by Chapter 19 of the City of Oxnard Public Works municipal code, Division 2. Wastewater Collection/Conveyance System, Sec. 19-10. Service Connections (F) "*Every connection, disconnection and permanent blocking or plugging made between private property and the system shall be made in the manner and with the material required by the specifications for public sewers approved by the city and in accordance with the city's specifications for construction*." ('64 Code, Sec. 25-5) (Ord No. 2494).

PUBLIC WORKS VENTURA COUNTY

WATERSHED PROTECTION

MEMORANDUM

Letter 4

DATE: October 19, 2022

TO: Anthony Ciuffetelli, Planner, Planning Division

FROM: James Maxwell, Groundwater Specialist

SUBJECT: RMA 22-014-1 – Rio del Valle Middle School Existing Campus Expansion Master Plan

The Ventura County Public Works Agency, Water Resources Division, Groundwater Resources Section (VCWRD-GRS) reviewed the *Draft Environmental Impact Report* (DEIR) submitted by the City of Oxnard.

PROJECT DESCRIPTION

The proposed development (Project) area, occupied by Rio del Valle Middle School and adjacent agricultural operations, will be located on multiple parcels encompassing a total of 41.3 acres total. The School is located at 3100 Rose Avenue in unincorporated County area. The School currently exists on 30.2 acres of Assessor's Parcel Numbers (APNs) 144-0-110-445 and -225 and will add 11.1 acres of APN 144-0-110-590 to the south of the current property. The parcels associated with the proposed project are proposed for annexation into the City of Oxnard. The Project currently falls within the boundaries of the *El Rio/Del Norte Area Plan*. The proposed project includes development within the expanded campus that would occur in two phases.

GROUNDWATER QUANTITY AND WATER SUPPLY

The Project overlies the Oxnard Subbasin, a high priority, critically-overdrafted basin designated by the Department of Water Resources (DWR) as Basin No. 4-004.02. The proposed project is located within the Fox Canyon Groundwater Management Agency (FCGMA) area. The FCGMA regulates groundwater extraction allocations for well owners and operators and limits groundwater extraction volumes to address overdraft and to bring the basins to safe yield. Policy ED-39.1 of the *El Rio/Del Norte Area Plan* stipulates that discretionary development will not result in the net decrease in the quantity of groundwater, taking into account existing and projected water supply and demand factors. Water offsets may be utilized. Policy ED-39.4 prohibits discretionary development that would significantly decrease the recharge capability of the property.

The School currently receives water from the City of Oxnard, United Water Conservation District (UWCD) and a Rio School District-owned well on the school property. The proposed project's southern expansion will obtain potable water from a new connection to the City of Oxnard water system. Improvements proposed on the existing campus

parcels will utilize connections from existing service lines. The northern expansion area will continue to utilize agricultural water from existing groundwater wells. The City of Oxnard's water supply consists of imported water from Calleguas Municipal Water District (CMWD), groundwater extracted by UWCD and groundwater extracted from the City of Oxnard's wells.

The new northern campus expansion area will require approximately 20 acre-feet per year (AFY) of irrigation water for agricultural crops. Jensen Design and Survey, Inc. (Jensen) prepared the *Proposed Rio Del Valle School Expansion Domestic Water Demand and Allocations Technical Memorandum* (dated August 2, 2022 and included in Appendix H of the DEIR) that reported calculations for the total water demand for the proposed expansion to be 48.574 AFY. Final build-out would increase usage by 1.846 AFY. The existing and new sports fields will be replaced with high efficiency landscaping which would result in an irrigation reduction of 22.676 AFY. FCGMA water allocations including existing allocations and water to be transferred to the Project with the newly acquired land will total 66.275 AFY, resulting in a net surplus of 17.701 AFY for the entire proposed project. The proposed project is anticipated to have sufficient water supplies for the foreseeable future, even with scheduled cutbacks in supply and extractions by the City. Comment 4-1

The DEIR states that the proposed project will increase the school's water demands. Any additionally extracted groundwater quantity exceeding allocations should be offset with water saving measures or mitigations per the *El Rio/Del Norte Area Plan*. The City of Oxnard is requiring the proposed project to establish a plan for water neutrality under the *City Water Neutrality Policy*, which requires all new development approved within the City to offset water demand with a supplemental water supply. Under the policy, this includes funding City water conservation programs and/or recycled water retrofit projects. Comment 4-2

The site development will create new impervious surfaces and hardscape and disturb approximately 11 acres of the southern campus expansion area. Proposed site improvements include additional parking facilities and hardscape sports facilities. Jensen prepared the *Rio de Valle Middle School Expansion Preliminary Drainage/Hydrology Report* (dated July 11, 2022 and included in Appendix H of the DEIR) that proposed post-construction control measures consisting of capturing runoff from the Site in storm drains that will runoff to a hydrodynamic separator for pretreatment, then into an infiltration/detention basin. Larger storm events will bypass the system with a diversion structure and flow to a City stormwater conveyance system. The DEIR reported that the reduction in infiltration would not be substantial relative to the underlying groundwater basin and that the proposed post-construction infiltration and detention basin should contribute to groundwater recharge.

GROUNDWATER QUALITY

The Project area is currently provided sewer service by the City of Oxnard. Sewer service to the southern campus expansion area will be provided by a new connection from the City. The Oxnard Wastewater Treatment Plant (OWTP) provides treatment capacity for wastewater generated within the City's service area. The OWTP is currently operating below its daily capacity. Jensen prepared the *Sewer Preliminary Investigation* (dated August 5, 2022 and included in Appendix H of the DEIR) which analyzed the proposed increase in sewer flow from the Project and determined that the existing sewer line will meet the City of Oxnard's capacity criteria. The project is proposing a bus wash system that will recycle the system's wastewater and discharge 25% of the wastewater to the City sewer system. Clarification should be added to the DEIR as to how the wastewater is recycled and/or how residual recycling waste is disposed, and any mitigations needed to reduce impacts. Comment 4-3

Section 3.10 states that pollutants of concern including petroleum products, solvents, fuels and concrete waste would have the potential to spill or leak. The Stormwater Pollution Prevention Plan (SWPPP) will be prepared as required under the Construction General Permit, which would include housekeeping measures intended to prevent spills, leaks, and discharges. Section 3.10 of the DEIR does not anticipate groundwater to be encountered during excavation. The *Update Report of Geotechnical Study* (dated November 12, 2020 and prepared by NV5 West, Inc.) was included in Appendix D of the DEIR and reported that groundwater was not reported in any exploratory borings, and that the historically highest groundwater levels at the site were 20 feet below ground surface. Perched groundwater encountered during excavation would require dewatering. Any dewatered groundwater would be completed in accordance with the Los Angeles Regional Water Quality Control Board's (LARWQCB) Groundwater Discharge Permit. Comment 4-4

The DEIR states that agricultural irrigation and runoff can cause leaching of nitrate into the underlying basin, but due to the transition of the southern campus expansion area from agricultural to education land use, the net contribution of nitrates to groundwater would be lower. It is not known if individual septic systems or wastewater treatment systems currently provide service to any portion of the parcels within the proposed Project area. Any existing wastewater treatment systems should be removed during build-out. Comment 4-5

The County of Ventura began issuing well permits for the construction, maintenance, operation, use, repair, modification and destruction of groundwater wells in 1970 and has records of the following wells located within the proposed Project boundary:

State Well Number (SWN)	County Well Permit Number	APN	Installation/ Destruction Date	Status	Main Use	Depth (ft bgs[1])	Screened Interval (ft bgs)
02N22W26B01S	--	144-0-110-445	--	Destroyed	Domestic	191	23-190
02N22W26B02S	--	144-0-110-445	November 1927, Destroyed September 1935	Destroyed	Agricultural	--	--
02N22W26B03S	1195	144-0-110-225	August 1983	Active	Municipal	1,495	575-1,475
02N22W26C02S	--	144-0-110-445	--	Can't Locate Indeterminable	Domestic	--	--
02N22W26C03S	--	144-0-110-445	December 1948	Active	Municipal	240	98-240
02N22W26C04S	--	144-0-110-445	--	Can't Locate Indeterminable	Domestic	--	--
02N22W26F02S	--	144-0-110-590	March 1960	Active	Agricultural	292	120-280
02N22W26F03S	--	144-0-110-590	February 1953	Can't Locate	Domestic	200	146-192

Any wells encountered during grading and constructionor that will no longer be used by the project or considered as "Active" status will need to be permitted for destruction per Ventura County Ordinance No. 4468 (Well Ordinance).

Comment 4-6

[1] Feet below ground surface.

Letter 4	James Maxwell, Groundwater Specialist Ventura County Department of Public Works

Response to Comment 4-1

The proposed project is anticipated to have sufficient water supplies for the foreseeable even with scheduled cutbacks in supply and extractions by the City. Comment is hereby noted, and no further response is necessary.

Response to Comment 4-2

A water neutrality plan will be prepared in accordance with the El Rio/Del Norte Area Plan as well as the City of Oxnard's Water Neutrality Policy. Applicable goals and policies of the El Rio/Del Norte Area Plan have been added to Section 3.10.1.2, Regulatory Setting, portion of Section 3.10 of the Draft EIR. The City's Water Neutrality Policy, as well as Mitigation Measure HYDRO-2, which calls for the proposed project to meet OWNP requirements, are documented in this section also.

Response to Comment 4-3

The bus wash wastewater will be recycled using a Wash Water Restoration System, or similar equipment. This system will recycle and reuse water with an expected maximum waste stream of 25% of used water. Section 3.18.2.3 of the Draft EIR has been modified to include this language.

Response to Comment 4-4

The requirement for a Groundwater Discharge Permit in the event perched groundwater is encountered during excavation is noted in Section 3.10.2.3, including Mitigation Measure HYDRO-1, which calls for adherence to the RWQCB GDP provisions, and no further modification to the Final EIR is required.

Response to Comment 4-5

As indicated in the Response to Comment 1 in the Comment Letter from Ashley Kennedy from the Land Use Section of the County of Ventura Environmental Health Division, the existing Onsite Wastewater Treatment System (OWTS) located at 2600 North Rose Avenue will be properly disconnected and abandoned per all applicable State, County of Ventura, and City of Oxnard building code regulations, including but not limited to County of Ventura Ordinance No. 4341, Section 4-6, Abandonment of Existing Sewage Disposal Facilities, "*After the effective date of this Ordinance, all existing private Sewage disposal systems, including, but not limited to, cesspools, septic systems, seepage pits, vaults, pit toilets, and privies shall be abandoned in the manner required by the Uniform Plumbing Code*." In addition, and as required by Chapter 19 of the City of Oxnard Public Works municipal code, Division 2. Wastewater Collection/Conveyance System, Sec. 19-10. Service Connections (F) "*Every connection, disconnection and permanent blocking or plugging made between private property and the system shall be made in the manner and with the material required by the specifications for public sewers approved by the city and in accordance with the city's specifications for construction*." ('64 Code, Sec. 25-5) (Ord No. 2494).

Response to Comment 4-6

The requirement for well destruction per VC Ordinance No. 4468 is hereby noted and Section 3.10 of the Draft EIR has been modified accordingly to reflect this requirement.

COUNTY of VENTURA
RESOURCE MANAGEMENT AGENCY
DAVE WARD
Planning Director

SUSAN CURTIS
Assistant Planning Director

November 21, 2022

Wael Saleh, CPA, MBA
Assistant Superintendent, Chief Business Official
Rio School District
1800 Solar Drive
Oxnard, CA 93030

Letter 5

SUBJECT: Draft Environmental Impact Report for Rio Del Valle Campus Expansion Master Plan
3100 Rose Avenue (Assessor's Parcel Numbers 144-0-110-590, 144-0-110-225, 144-0-110-445)

Dear Wael Saleh,

Thank you for providing the Ventura County Planning Division with the opportunity to comment regarding the Draft Environmental Impact Report (DEIR) for the Rio De Valle Middle School Existing Campus Expansion Master Plan (Proposed Project). The following comments describe that there should be clearer protections and mitigations for agriculture, transportation, and air quality impacts, and clarify that El Rio is a Designated Disadvantaged Community.

Project Background
The Rio School District (RSD) provides kindergarten through 8th grade education to the unincorporated communities of El Rio and Nyeland Acres, and portions of the City of Oxnard. RSD identified that additional facilities are needed to accommodate the growing student population and the proposed Rio De Valle Middle School (RDV) Campus Enhancement Master Plan will accommodate the expected student growth. There are renovations taking place on the existing main campus, however those aspects are not considered a part of this California Environmental Quality Act (CEQA) project review, and those renovations were previously determined to be exempt from CEQA.

The Proposed Project includes the expansion of the RDV campus shown in Attachments 1 and 4 that would occur in two phases over an approximate five-year period. Attachment 1 shows the existing Rio De Valle campus (Main Campus), which is approximately 20.2 acres (APN 144-0-110-445). North of the Main Campus lies approximately 10 acres of active agricultural lands (a portion of APN 144-0-110-225) that are proposed as the North Campus Agricultural Learning Program Area (North Campus). The Proposed Project also includes 11.1-acres to the south of the Main Campus (a portion of APN 144-0-110-590), labeled in Attachment 1 as the South Campus Expansion Area (South Campus). The North Campus is proposed to remain in agricultural production and the South Campus is planned for new educational and RSD support facilities. The three campus sites combined total approximately 41.3 acres.

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The RSD is currently in escrow to acquire the South Campus property. In accordance with Public Resources Code section 21151.2 and Government Code section 65402, the Rio School District requested in a letter dated October 24, 2022 that the Ventura County Planning Commission investigate and report on the acquisition of the South Campus site. On November 17, 2022 the Ventura County Planning Commission reviewed the acquisition of the South Campus site and approved a resolution finding the Proposed Project is inconsistent with the Ventura County General Plan, Area, Plan, and zoning designations for agricultural uses.

The Proposed Project is planned by RSD for annexation into the City of Oxnard although it is currently located entirely within the boundaries of the unincorporated County. The Main Campus has a General Plan designation of Very Low Density Residential, Area Plan designation of Institutional, and is zoned Rural Exclusive with a 20,000 square foot lot size (RE-20,000). The parcels that include the North and South Campus sites are designated as Agriculture per the Ventura County's General Plan and El Rio/Del Norte Area Plan and are zoned Agricultural Exclusive with 40-acre minimum lot size (AE-40).

The North and South Campus sites have active agriculture that is protected by the County's Guidelines for Orderly Development and the Save Open Space and Agricultural Resources (SOAR) initiative. The sites are also outside of the City of Oxnard Sphere of Influence and the City of Oxnard Urban Restriction Boundary (CURB). The DEIR Executive Summary describes the anticipated proposed project permit pathway which includes coordination with the County and Ventura Local Agency Formation Commission (LAFCo) to modify the County of Ventura-Oxnard-Camarillo Greenbelt, annex the land into the City of Oxnard and Casitas Municipal Water District, and also update the Sphere of Influence and CURB boundaries, among other actions.

Project Phases
The DEIR describes that construction in accordance with the master plan would occur in two phases, as decided further below.

Phase I: Annexation of the three parcels into the City of Oxnard will occur during Phase I. Construction will start after approval of the EIR, which RSD anticipates will occur in December 2022. The South Campus will include a 7,500 square foot (sq. ft). maintenance building, two 1,080 sq. ft. portable buildings, 528 sq. ft. restroom, and conversion of the approximately 3,130 sq. ft. existing residential structure located on the project site to office use. There will also be additional parking, including bus and district vehicle parking that will be relocated from the temporary parking facility located at the Oxnard School District Transportation Center (near 516 W. Wooley Road) to this new proposed south campus. The new parking lot will provide 214 standard and 10 accessible parking spaces for the RDV campus as well as parking for the district's 17 buses. Lastly, there will be additional recreational facilities including a new running track, sports fields and courts on the South and Main Campus.

Phase II: This phase includes improvements to the North Campus and the remaining portions of the South Campus site. Construction will start on the Phase II improvements in two to five years (2024–2027). The North Campus is currently utilized for agriculture

and RSD plans to continue this use as an outdoor "working farm classroom." Buildout of the South Campus would include 13,080 sq. ft. of new classrooms, 5,400 sq. ft. of multipurpose buildings, and a 5,400 sq. ft. library/media center. There will also be construction of another play field, jogging path, and volleyball courts on the South Campus. Lastly, utility improvements will take place with water and sewer connections to the City of Oxnard.

CEQA Review

The following comments focus on potential impacts to agriculture, air quality, cultural resources, and transportation. The County's and State CEQA guidelines were used for this review, but annexation into the City of Oxnard would appear to necessitate the DEIR to include an evaluation of the Proposed Project with the City's CEQA thresholds for significant environmental impacts.

Section 3.2: Agriculture and Forestry Resources

Per the DEIR section AG 3.2, the Proposed Project plans for development of the South Campus with school uses including classrooms, recreational facilities, and parking facilities (Attachment 4). The DEIR identifies that 8.2 acres (or 74%) of the approximately 11.1- acre southern campus expansion area is Prime Farmland and 2.9 acres (or 26%) is Farmland of Statewide Importance (page 3-26 of the DEIR). Thus, the Proposed Project includes the conversion of greater than 5 acres of Prime/Statewide Important Farmland and would result in a significant impact due to the conversion of important farmland to non-farmland uses according to the County of Ventura Initial Study Assessment Guidelines criteria. The DEIR identifies that this conversion would have a significant unavoidable impact for the loss of farmland acreage.

The DEIR section 3.2.2.5, Mitigation Measures, includes Mitigation Measure AG-1 for loss of agricultural land, which would offer the topsoil for removal to another farm operation, if feasible, as a partial mitigation for the loss of prime farmland. AG-1 details that the district shall offer at cost the top 12 inches of the Prime Farmland and Farmland of Statewide importance soils from the South Campus area for relocation to a farm site or farm sites that have lower quality soils. Partial mitigation of this nature is not adequate mitigation for the loss of prime farmland. Comment 5-1

The DEIR also mentions that the City of Oxnard has policies that encourage establishment of a farmland protection program and use of conservation easements and land banking to protect continued agricultural uses throughout the City's Sphere of Influence, and policies and programs that support existing agricultural buffers (such as the SOAR Ordinance) to reduce or slow further loss of agricultural resources, however, these policies do not offset an actual loss of farmland acreage. It is also identified in the DEIR that no additional feasible mitigation measures are currently available to reduce this impact to a less than significant level, therefore this impact would remain significant and unavoidable.

The DEIR finds that there are no feasible mitigation measures available to offset the loss of farmland acreage. However, there is not enough detail included in the DEIR as to why other mitigation options such as conservation easements are infeasible. The Comment 5-2

DEIR should evaluate other mitigation measures and determine why those mitigation measures are inadequate or infeasible. Comment 5-2 cont.

All parcels identified in the master campus project in the DEIR are currently subject to policies of the County of Ventura's General Plan. The General Plan Environmental Impact Report Section 4.2.2 evaluated the impact of the General Plan on Agricultural resources. The EIR concluded that the potential loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance as a result of future development under the 2040 General Plan would be potentially significant. To reduce this impact, the EIR included Mitigation Measure AG-1: New Policy AG-X Avoid Development on Agricultural Land "The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland as much as feasibly possible." Additionally, Mitigation Measure AG-2: New Implementation Program AG-X: Establish an Agricultural Conservation Easement which requires discretionary projects that would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table included in the EIR shall ensure the permanent protection of offsite farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement was included in the EIR. (see EIR Mitigation Monitoring and Reporting Program at webpage 4 Env Intro.docx (vcrma.org)). The General Plan EIR Statement of Overriding Considerations (at webpage Chapter 1 Intro (RMM) (00302596).DOCX (vcrma.org) included the finding that "Implementation of Mitigation Measures AG-1 and AG-2, which has been required or incorporated into the project, would reduce impacts to Important Farmland to the extent feasible. The County has adopted and will implement these mitigation measures. However, any direct or indirect loss of Important Farmland would be considered a permanent loss of a valuable resource. Establishing agricultural conservation easements would conserve Important Farmland within the county but would not prevent the loss of existing Important Farmland. There are no actions or policies that the County could feasibly mandate to fully replace the loss of Important Farmland (see page 4.2-17 of the draft EIR). Therefore, this impact would remain significant and unavoidable." Comment 5-3

The DEIR should include mitigation measures for all areas that include Important Farmland similar to the County's General Plan EIR Measures AG-1 and AG-2 discussed above. Incorporation of these similar mitigation measures in the DEIR would reduce impacts to Important Farmland to the extent feasible. Comment 5-4

The 1:1 mitigation ratio for the purchase of agricultural easements required Mitigation Measure AG-2: New Implementation Program AG-X: Establish an Agricultural Conservation Easement in the County General Plan EIR should be included as an agricultural mitigation measure, for both the South and North Campus areas, even though the North Campus is proposed to remain a working farm "classroom". The DEIR describes the working farm classroom program will partner with other school districts, provide produce for school food services, and market the surplus produce. Thus, the RSD would not convert the North Campus to a non-agricultural use and that no significant impacts would occur. However, this comment does not take into consideration that should the Northern Campus Site be annexed, and all applicable City Comment 5-5 Comment 5-6

of Oxnard approvals be met, then the land use could be changed at a future time from agriculture to another type of land use that allows development and conversion of the land without 1:1 mitigation. Another mitigation measure that should be evaluated in the DEIR is a deed restriction or conservation easement that preserves the North Campus as an agricultural use in perpetuity.

Comment 5-6 cont.

The DEIR should also be revised to evaluate the Agricultural Classroom program and potential sensitive receptor exposure to soils contamination, dust, and other particulate matter. Section 3.9.1 Environmental Setting of the DEIR describes that development potential of the North Campus parcel is limited until other uses can be supported based on studies of human health risk screening evaluations, former pesticide applications, and soil contamination. The DEIR finds no further action is recommended for the North Campus for as long as it is used for agricultural production. However, the program for an outdoor agricultural classroom on the North Campus should be reviewed by the Ventura County Agricultural Commissioner and the Ventura Local Agency Formation Commission to determine if it should be considered as a project under CEQA and would be compliant with local health and safety regulations.

Comment 5-7

Section 3.3: Air Quality

The DEIR Air Quality section 3.3.2.3 asks if the project would expose sensitive receptors to substantial pollutant concentrations. CalEnviroScreen 4.0 Pesticide Map[1] displays that the census tract that this Proposed Project is located is within the highest pesticide use percentile. The DEIR states that in accordance with Goal CD-6 of the Oxnard General Plan, the proposed project includes a buffer between agricultural fields and classrooms in the form of soccer, baseball, softball, and football fields, as well as tennis courts and parking lots. The DEIR should accordingly demonstrate and study what the pollutant concentrations would be to sensitive receptors such as students within these buffer areas. The California Department of Pesticide Regulation [2] and the Integrated Pesticide Management Program[3] includes standards that address agricultural pesticide applications on or near public K-12 schools and the regulations provide minimum distance standards for certain agricultural pesticide applications near school sites and require annual notifications to school sites. The district should work with the Agricultural commissioner's office to confirm suitable application of agricultural buffer policies. Furthermore, the DEIR should include an evaluation of an education program with students on site with potential application of pesticides on the northern agricultural parcel to determine if could be consistent with an education program with students on site.

Comment 5-8

Section 3.5: Cultural Resources

The Cultural Resources section of the DEIR details that the historic map and aerial review and Phase I archaeological survey identified two historic era-built environment resources including a residential building constructed between 1947 and 1967 as illustrated in Attachment 3. Furthermore, the project design plans for a modification to the existing 3,000 square foot residential building for conversion to office uses. The

Comment 5-9

[1] https://oehha.ca.gov/calenviroscreen/indicator/pesticide-use
[2] https://www.cdpr.ca.gov/docs/enforce/pesticide_applications_near_schoolsites.htm
[3] https://www.cdpr.ca.gov/docs/schoolipm/

DEIR notes that these potential historic resources are unrecorded and have not been evaluated for significance eligibility as historical resources under CEQA. Accordingly, mitigation measure CUL-1 Built Environment describes that 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 residential building and infrastructure.

Comment 5-9 cont.

The existing mitigation measure CUL-1 should be revised to evaluate compatibility with Ventura County General Plan Program JJ which covers Project-Level Historic Surveys and Protection of Historic Resources. That program finds, "before altering or otherwise affecting a building or structure 50 years old or older, a project-applicant should retain a qualified architectural historian according to the Secretary of the Interior Standards, to record it on a California Department of Parks and Recreation DPR 523 form or equivalent documentation, if the building or structure has not previously been evaluated. Its significance shall be assessed by a qualified architectural historian, using the significance criteria set forth for historic resources under CEQA Guidelines Section 15064.5". For discretionary projects submitted to the Ventura County Planning Division and the City of Oxnard, this evaluation is typically needed at the time of application and prior to approval and includes not only the building itself but also the setting. The assessment of the potential historic resource by a qualified architectural historian thus should be completed prior to the design and construction phase of the project and included in detail in the DEIR so potential impacts can be evaluated. This process will allow for an opportunity to better understand potential impacts that may occur to the potential historic structure and the local setting prior to construction.

Comment 5-10

Section 3.6.2.3 Project Impacts

Section 3.6.2.3 of the DEIR finds that there are six daily bus trips for students of RDV and 24 buses for trips serving other district school sites. The 24 buses that are not needed to serve students of RDV would unduly impact the surrounding community by causing traffic and air quality impacts. This section states that the distance buses travel to the proposed parking located at the Proposed Project South Campus is preferable than traveling to and from the Oxnard School District Transportation Center (near 516 W. Wooley Road) because the Proposed Project is more centrally located within the RSD. However, this statement appears incorrect because the proposed project is located beyond the northern perimeter of the City of Oxnard boundary and quantitative data should be used to determine if energy usage is actually lessened. The DEIR also has not demonstrated how including the 24 buses is consistent with the County's General Plan and zoning and would cause unnecessary impacts on residents of the El Rio community. The project description describes that the current bus parking area is located at a temporary parking facility at the Oxnard School District Transportation Center. The DEIR states that the temporary bus parking location will be utilized until bus parking facilities included as part of the proposed project become available. RDV is located in a Designated Disadvantaged Community and using the site for vehicle storage will contribute to environmental impacts due to increased traffic and air pollution from additional bus trips. Thus, the DEIR should also evaluate as to why the temporary bus parking location at the Oxnard School District Transportation Center on Wooley

Comment 5-11

Comment 5-12

Comment 5-13

Road cannot be considered as a suitable site for bus parking compared to the Proposed Project.

Comment 5-13 cont.

Section 3.11.1.1: Land Use and Planning, Environmental Setting, Existing Conditions
This section should clarify the General Pan and Area Plan Designations for the northern and southern expansion areas are Agriculture with a 40-acre minimum lot size.

Comment 5-14

Section 3.16: Transportation
There are several new improvements planned for site access and circulation in the Proposed Project. In accordance with Appendix G of the CEQA Statue and Guidelines Environmental Checklist and Section 3.16.2.2 of the DEIR, one of the thresholds questions asks, "if the project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?".

In following review of this CEQA checklist question, the Proposed Project includes a new right-turn only driveway located on Rose Avenue south of the intersection with Orange Drive that would provide access to Parking Lot A. This curb cut, shown in Attachment 4, should be further analyzed in the EIR to determine if the proximity from the light at Rose Avenue located from Collins Street would increase transportation hazards resulting from vehicles accelerating at the light on Rose Avenue and then immediately beginning to break due to vehicle congestion caused to individuals queuing to enter Parking Lot A via the new curb cut. If the EIR analysis finds that the new curb cut for Parking Lot A would increase transportation hazards, a potential mitigation measure to consider may include a right turn lane on Rose Avenue before the curb cuts into Parking Lot A.

Comment 5-15

Comment 5-16

Furthermore, the Planning Division recommends that an additional school crossing sign be added further south along Rose Avenue closer to the intersection of Collins Street to alert drivers that they are entering a school zone and that school crossing will occur at the intersection of Collins Street and Rose Avenue. This suggestion is made due to the proposed expansion of the South Campus and extension of the school area to Collins Street.

Comment 5-17

Lastly, the district should contact the Ventura County Transportation Commission to determine if there are any future improvement projects or updates to the Ventura Countywide Bicycle Master Plan (VCBMP) prior to commencement of phase two of the Proposed Project. Any informational updates to the VCBMP or new improvement projects should be considered and used to assist in the design of safe pedestrian access for children trying to cross Collins Street to enter the new proposed sports fields and campus additions that will be completed in phase two of the Proposed Project.

Comment 5-18

Advisory - County Policies for Coordination and Environmental Justice
The County General Plan identifies Designated Disadvantaged Communities (DDCs) pursuant to Senate Bill SB 1000 (2016) which requires a jurisdiction to include an Environmental Justice element or include goals, policies, and objectives in other element(s) of the general plan addressing health risks within "designated disadvantaged

communities" A community is classified as a DDC if it meets one or both of the following definitions:

- "Disadvantaged communities" means an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation;
- "Low-income area" means an area with household incomes at or below 80 percent of the statewide median income or with household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 50093.

The County General Plan Land Use Element identifies the El Rio/Del Norte Area Plan as a Designated Disadvantaged Community (DDC) (Figure 2-6). The Land Use Element also includes Policy LU-19.1 County and City Cooperation which states "The County shall work cooperatively with all cities in the county to enhance consistency among planning processes and to ensure that each jurisdiction's general plan is compatible with the Ventura County General Plan, the Guidelines for Orderly Development, and adopted greenbelt agreements."

The Rio De Valle school is located within this DDC as well as within the boundary of the El Rio/ Del Norte Area Plan (Area Plan). Area Plan Policy ED-21.1 Public Review Authority states that "The El Rio/Del Norte Municipal Advisory Council shall continue to be the Board of Supervisors' recognized public review group for the El Rio/Del Norte area. All County and city applications for discretionary permits and *all environmental documents* for projects which would affect the El Rio/Del Norte area shall be sent to the Board of Supervisors' Office for transmittal to the El Rio/Del Norte Municipal Advisory Council as early in the process as possible." The County encourages the school district and the City of Oxnard coordinate with the El Rio/Del Norte Municipal Advisory Council (MAC) to review the proposed project to and secure MAC input on potential impacts that may occur from the project as proposed.

Comment 5-19

As an advisory, Senate Bill 535 and Assembly Bill 1550 require that at least 35% of all Cap-and-Trade auction proceeds from the California Investments project benefit disadvantaged communities and low-income communities. Under these two laws a community is classified as a DDC if it meets one or both of the following definitions:

Comment 5-20

- "Disadvantaged Communities" shall be identified by the California Environmental Protection Agency and be based on geographic, socioeconomic, public health, and environmental hazard criteria and may include, but are not limited to, either of the following:
    - Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation;

  - Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment
- "Low-income communities" are census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 50093.

In closing, thank you again for the opportunity to comment on this proposed master plan DEIR. The Planning Division is hopeful that the school district will take these comments into consideration going forward with updates to the DEIR. This action would facilitate meaningful public disclosure of potential environmental impacts and mitigation measures on the unincorporated county.

If you have any questions about this letter, please contact Joel Hayes at Joel.Hayes@ventura.org or 805.654.2834.

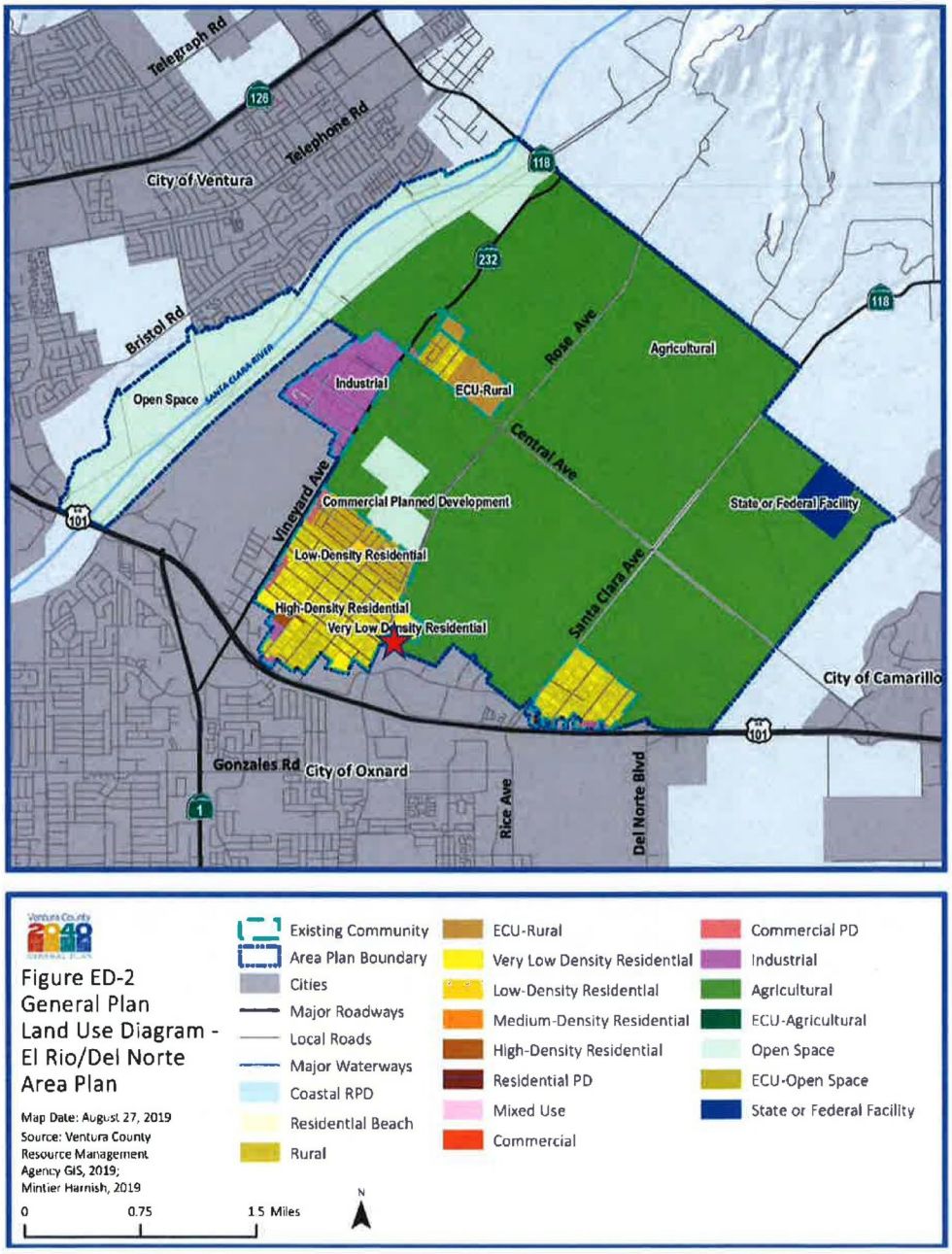
Sincerely,

Susan Curtis for Dave Ward

Dave Ward, AICP
Planning Director
Ventura County Planning Division

Attachment 1: Rio De Valle Middle School Expansion Area Map

Attachment 2: General Plan Land Use Diagram and El Rio/ Del Norte Area Plan Map, with the Proposed Project identified with a ★ symbol


Telegraph Rd
126
Telephone Rd
City of Ventura
118
232
Bristol Rd
Open Space
SANTA CLARA RIVER
Industrial
ECU-Rural
Rose Ave
Agricultural
Central Ave
Vineyard Ave
Commercial Planned Development
State or Federal Facility
101
Low-Density Residential
High-Density Residential
Very Low Density Residential
Santa Clara Ave
City of Camarillo
Gonzales Rd
City of Oxnard
1
Rice Ave
Del Norte Blvd
Figure ED-2
General Plan
Land Use Diagram -
El Rio/Del Norte
Area Plan
Map Date: August 27, 2019
Source: Ventura County
Resource Management
Agency GIS, 2019;
Mintier Harnish, 2019
0
0.75
1.5 Miles
N
Existing Community
Area Plan Boundary
Cities
Major Roadways
Local Roads
Major Waterways
Coastal RPD
Residential Beach
Rural
ECU-Rural
Very Low Density Residential
Low-Density Residential
Medium-Density Residential
High-Density Residential
Residential PD
Mixed Use
Commercial
Commercial PD
Industrial
Agricultural
ECU-Agricultural
Open Space
ECU-Open Space
State or Federal Facility

Attachment 3: Potential historic residence built between 1947 and 1967

Attachment 4: Proposed Master Campus Site Plan

Letter 5	Joel Hayes, Land Use Planner Ventura County Planning Division

Response to Comment 5-1

As discussed in the Draft EIR, Section 3.2.2.3, the proposed project would not convert the approximately 10 acres on the northern campus expansion area of the project Site to a non-agricultural use as plans to utilize the Site as an outdoor working farm "classroom." In order to provide additional clarification, the following Mitigation Measure AG-2 will be added to Section 3.2.2.6:

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.

As discussed in the Draft EIR, Section 3.2.2.3, *The City has determined that conversion of agricultural land is a project-level impact and requires a mitigation measure to offer the topsoil for removal to another farm operation, if feasible, as a partial mitigation for the loss of prime farmland impact (City of Oxnard 2012). The City has policies that encourage establishment of a farmland protection program and use of conservation easements and land banking to protect continued agricultural uses throughout the City's SOI and policies and programs that support existing agricultural buffers (such as the SOAR Ordinance) in order to reduce or slow further loss of agricultural resources, however, these policies do not offset an actual loss of farmland acreage. No additional feasible mitigation measures are currently available to reduce this impact to a less than significant level, therefore this impact would remain significant and unavoidable (City of Oxnard 2009).*

As discussed in the Draft EIR, Section 3.2.2.3, impacts were identified associated with the proposed project's conversion of approximately 7.9 acres of Prime Farmland and 2.9 acres Farmland of Statewide Importance in the southern campus expansion area. However, of these 10.8 acres, only 8.7 acres are actively used for agricultural production. As discussed in the Draft EIR, Section 3.2.2.3, the proposed project would not convert the approximately 10 acres on the northern campus expansion area of the project Site to a non-agricultural use. And as discussed in Response to Comment 6-15, to provide additional clarification, the District will commit to retaining the agricultural use of the northern campus expansion area for a minimum of 10 years. Therefore, the commitment of the 10 acres on the northern campus expansion area will provide mitigation for the loss of the prime farmland in the southern campus expansion area. The provision of Mitigation Measures AG-1 and AG-2 provides an appropriate level of mitigation.

Response to Comment 5-2

See Response to Comment 5-1.

Response to Comment 5-3

See Response to Comment 5-1. As discussed in the Draft EIR, Section 3.2.2.3, conversion of agricultural land would remain a significant and unavoidable impact.

Response to Comment 5-4

See Response to Comment 5-1.

Response to Comment 5-5

See Response to Comment 5-1.

Response to Comment 5-6

See Response to Comment 5-1.

Response to Comment 5-7

As discussed in the Draft EIR, Section 3.2.2.3, the existing main campus of the project Site has been developed as a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses, which includes the northern campus expansion area. The District has designed the lay-out of the proposed project in order to minimize compatibly issues with adjacent agricultural uses and will be compliant with local health and safety regulations. In addition, as appropriate and applicable, the District will follow recommendations in Farming Near Schools, A Community Guide for Protecting Children (Ag Futures Alliance 2002). The District has been in contact with and has submitted the Draft EIR for review to the Ventura County Agricultural Commissioner and the Ventura Local Agency Formation Commission and received no comments from either agency.

Response to Comment 5-8

In accordance with Ventura County Code of Ordinances section 8114-2.1.1 – *Exception –Agricultural Operations Protection*, "No agricultural activity, operation or facility that is consistent with this Chapter and the General Plan, and is conducted or maintained for commercial purposes in a manner consistent with proper and accepted customs and standards as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after it has been in operation for more than one year if it was not a nuisance at the time it began." In accordance with this Ordinance, an agricultural operation that has been operating in compliance with county ordinance, the applicable general plan, and accepted standards for more than a year is not consider a nuisance.

Both the northern and southern campus expansion areas are leased by Reiter Affiliated Companies for organic crop production. Review of historical aerial photographs indicates that the northern and southern expansion areas of the Site have been used for agricultural production since at least 1927 (Tetra Tech 2020a; 2021a). The Rio Del Valle Middle School campus parcel (APN 144-0-10-445) on North Rose Avenue was formerly used for agricultural production since at least 1927 until approximately 1961, when the school was constructed (RSD 2022). A residence has been located on the southern campus expansion area since approximately 1959.

Per the provisions stated in Section 8114-2.1.1 and the history of agricultural operations associated with the campus addition, an additional study is not deemed necessary.

Further, agricultural spraying activities are regulated and enforced by the Ventura County Agricultural Commissioner's office.

Response to Comment 5-9

Although initial design plans identify potential modifications to the two on-site historic era-built environment resources, final design and construction shall be dependent on the results of the evaluation of those resources. All historic era-built environment resources, including the residential buildings will be evaluated by a Secretary of Interior qualified architectural historian prior to final design and construction. Final design shall consider the results of the assessment and take appropriate actions to avoid any potentially significant impacts. Mitigation Measure CUL-4 would identify potentially feasible measures to mitigate any potential significant adverse changes in the significance of an historical resource or change the design to avoid any modifications that would result in any significant impacts to any cultural resources of significance.

Mitigation Measure CUL-4: Historic Resources Protection. 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.

Response to Comment 5-10

Evaluation of potential historic resources cannot be carried out prior to project approval and purchase of the land. Therefore, mitigation measures addressing unknown significance of potential historic resources cannot be practicably formulated according to the current environmental review schedule. Although initial design plans identified potential modifications to the two on-site historic era-built environment resources, final design and construction shall be dependent on the results of the evaluation of those resources. Therefore, final details of the design and mitigation affecting the structures in question will be postponed until they have been evaluated according to the significance criteria set forth for historic resources under CEQA Guidelines Section 15064.5, according to Mitigation Measure CUL-1. Mitigation Measure CUL-4 (see below) has been added to ensure that, subsequent to Mitigation Measure CUL-1, appropriate mitigation would be formulated and carried out to ensure that any significant adverse changes to any identified historic resources would be reduced to less than significant prior to final design and construction.

This is allowable under CEQA Section 15126.4(a)(l)(B), which allows for deferred formulation of mitigation measures when it is impractical or infeasible to include the details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. If any resources are deemed to be historically significant by Mitigation Measure CUL-1, then Mitigation Measure CUL-4 commits the project applicant to adopting specific performance standards that the mitigation would achieve, namely the avoidance of any significant adverse changes to the resource. The avoidance of significant adverse changes to the potential cultural resources in question could be achieved through modification of final design to incorporate appropriately formulated mitigation that is dependent on the results of the evaluation, in compliance with CEQA Section 15126.4(b). It is also possible that Mitigation Measure CUL-4 would require that the final design not alter the buildings in question at all. Therefore, no significant impacts to historic resources would occur with implementation of Mitigation Measures CUL-1 and CUL-4.

Mitigation Measure CUL-4: Historic Resources Protection. 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.

Response to Comment 5-11

As a point of clarification on buses, bus routes, and bus parking spaces; there are a total of 17 buses in the district fleet which provide student transport. No more than 13 buses are out on routes during any service period. That leaves four "spare" buses that are idle unless needed for replacement purposes. The proposed new bus parking facility adjacent to RDV is designed to have 24 bus parking spaces, primarily to provide extra space for movement and staging. There are three distinct bus transport periods each day (morning, midday, and afternoon). In the morning and afternoon periods, there are 13 buses in service running bus routes district-wide (thus 13 bus routes). A total of six bus routes during these periods transport students to or from RDV, and the remaining seven bus routes serve other schools. At midday, four bus routes provide transport services for other schools (not for RDV). That makes a daily total of 30 bus routes serving the district, with 12 of these bus routes for RDV students and 18 bus routes for students at other schools. The district currently does not anticipate buying additional buses or increasing bus routes for the foreseeable future. Section 3.6.2.3 of the Draft EIR will be modified to include these details

The Transportation section (Section 3.16.2.3) of the Draft EIR assessed local traffic concerns for the RDV location, which included the proposed new bus parking facility and the anticipated increase in bus traffic and concluded that impacts would not be significant. The assessment was augmented by a traffic study that evaluated the new facility design along with proposed traffic handling improvements for the existing middle school facility. The traffic study concluded that traffic flow would be improved because of the provision of a separate bus access driveway on Collins Avenue. Having buses access student drop-off and pick-up points, along with bus parking spaces, around the corner from Rose Avenue will help alleviate traffic congestion at the parent drop-off points that are accessed from Rose Avenue.

The Air Quality section (Section 3.3.2.3) of the Draft EIR considered possible impacts to local air quality from the proposed upgrades to RDV and the addition of the district bus parking facility. This evaluation covered air emissions from auto and bus traffic during both construction and operations periods, along with other sources, using standard computer modeling procedures recommended for environmental impact assessment in California. As required, this evaluation focused on the project location and the surrounding community and concluded that impacts to air quality would not be significant.

Response to Comment 5-12

Please note, as discussed in the Draft EIR Project Description there is a former bus facility (called the “existing” facility, located at 2714 E. Vineyard Avenue), a temporary bus facility (located at 516 W. Wooley Road, which is the Oxnard School District Transportation Center) and the proposed bus facility (with a street address is 3100 Rose Avenue, but the entrance is actually around the corner on Collins Street). The District was unable to extend their lease at the former bus facility location, so it was forced to make a temporary arrangement with the Oxnard School District to use their Transportation Center until a new location could be constructed. Because long-term use of the temporary facility is not part of the proposed action, nor is it feasible contractually, it was not considered in the EIR.

By comparing the location of the seven schools for which the District provides bus transportation (RDV and 6 other schools) to the locations of (a) the former bus facility and (b) the proposed bus facility, it was estimated that the daily bus travel distance would be reduced by approximately 21 miles with the proposed bus facility. These daily reductions are primarily from the 12 RDV bus routes (about 18 miles per day), but the net mileage reduction due to the other 18 bus routes (six other RDV schools) also contribute (3 miles per day) to the total reduction in bus-miles traveled per day. The result is that fewer miles would be traveled each day because of the proposed location of the new bus facility, and this would reduce fuel consumption. The language in Section 3.6.2.3 in the Draft EIR will be revised to include this quantitative assessment.

Response to Comment 5-13

As a point of clarification on buses, bus routes, and bus parking spaces; there are a total of 17 buses in the District fleet which provide student transport. No more than 13 buses are out on routes during any service period. That leaves four “spare” buses that are idle unless needed for replacement purposes. The proposed new bus parking facility adjacent to RDV is designed to have 24 bus parking spaces, primarily to provide extra space for movement and staging. Since this comment does not specifically relate to energy use impacts, and is asked similarly under the Land Use section, please refer to Response to Comment 5-20. Note that the proposed project will result an overall reduction in miles travelled by bus, as well as providing other advantages due to the expansion of public facilities that serve the local community. Although the project would concentrate school bus transportation activity, and to a lesser extent energy use, at the proposed location, there are no significant health risks associated with the project that might compound health risks within the El Rio/Del Norte DDC. In addition to the fact that the project is not considered a health risk, it also advances the stated goals of SB 1000, AB 617, the California Government Code, and elements of the Ventura County General Plan. See the Response to Comment 5-20 for a more detailed explanation.

Response to Comment 5-14

Text related to General Plan and Area Plan designations, as well as zoning, has been clarified throughout the EIR, as applicable, and now reads as follows:

The existing main campus has a Ventura County General Plan land use designation of Very Low Density Residential (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Institutional with a 10-acre minimum lot size (Ventura County 2020a: Figure 1b), and a zoning designation of RE-20,000 SF. The northern campus expansion area and the southern campus expansion area have a Ventura County General Plan land use designation of Agricultural (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Agricultural with a 40-acre minimum lot size (Ventura County 2020a: Figure 1b), and a zoning designation of AE-40 ac/MRP. The City of Oxnard General Plan land use designation for the existing campus is School; the designation for the northern campus expansion area and southern campus expansion area is Agriculture.

Response to Comment 5-15

Parking Lot A is served by the right-turn only driveway on Rose Avenue and a full access driveway on Collins Street. The main drop-off loop located northerly at Orange Drive would accommodate the majority of peak hour drop-off/pick-up traffic, with the right-turn only driveway accommodating less traffic (ingress parking traffic in the AM peak and egress traffic in the PM peak). The expected turning volumes are not expected to result in frequent queuing on Rose Avenue, therefore a right-turn lane would not be necessary. It is noted that the relocation of the Class II bike lane to the left of a right-turn lane would be disadvantageous to bicyclists.

Response to Comment 5-16

Per Response to Comment 5-15, the expected turning volumes are not expected to result in frequent queuing on Rose Avenue, therefore a right-turn lane would not be necessary.

Response to Comment 5-17

A school crossing sign further south along Rose Avenue closer to the intersection of Collins Street can be added. It is noted that formal roadway improvement plans, including signing and striping plans, will be developed during the preparation of construction documents for the proposed project.

Response to Comment 5-18

The District will contact VCTC prior to commencement of Phase 2 activities. As discussed in the traffic study, the County has developed the Rose Avenue Bike Lanes (Collins-Simon) project: construction of Class II bike lanes on Rose Avenue from Collins Street to Simon Way. This will include pavement overlay and bike lane striping improvements on Rose Avenue from south of Collins Street to North of Simon Way, installation of speed feedback signs and other signing additions.

Response to Comment 5-19

The Notice of Completion (NOC) and Draft EIR were submitted to the MAC via Supervisor Carmen Ramirez's office (District 5). RSD did not receive a comment letter on the Draft EIR from the MAC. The RSD will coordinate with the MAC to review the proposed project to secure MAC input on potential impacts that may occur from the proposed project.

Response to Comment 5-20

Equitable education facilities are envisioned to be highly functional and regionally integrated. The proposed project represents an overall reduction in miles travelled by bus and other logistical advantages for the expansion of public facilities to serve the community. The buses were formerly parked within the El Rio community in a facility that is closer to adjacent residences than the proposed facility. The proposed facility is separated by a parking lot and Rose Avenue from residences with agriculture use to the east and commercial buildings to the south. This represents a beneficial move of buses away from sensitive receptors. While there are no significant health risks associated with the proposed project that might compound health risks within the El Rio/Del Norte DDC, the project would concentrate school transportation and energy use at the proposed location. This in and of itself is not considered a health risk and is offset through the proposed project's advancement of the stated goals of SB 1000, AB 617, the California Government Code, and environmental justice elements of the Ventura County General Plan, as outlined below.

Under SB 1000, the Ventura County General Plan includes an environmental justice element, or related goals, policies, and objectives that are integrated in other elements, which identifies disadvantaged communities within the area covered by the General Plan. According to Section 65302 (h) of the California Government Code, the General Plan must promote environmental justice through goals, policies and objectives that accomplish the following:

1. Reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure, including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity.
2. Promote civil engagement in the public decision-making process.
3. Prioritize improvements and programs that address the needs of disadvantaged communities.[1]

SB 1000 aligns with AB 617, to reduce disproportionate pollution burdens in DDC communities. With regards to air quality specifically, the proposed project's long-term air emissions are less than established thresholds of significance, and its land use is not anticipated to provide for increased population growth above what is forecasted in the Oxnard and Ventura County General Plans, so the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment. The project Draft EIR found no significant impacts or cumulatively considerable effects to air pollution, hazardous materials, or noise effects.

The proposed project consists of improvements that address the educational needs of the community by modernizing and expanding educational facilities and education programs serving a growing enrollment. The proposed project is compatible with the County General Plan land use policy with respect to environmental justice. LU-17.1 of the County General Plan, includes the provision of equitable public services in DDCs. Public education is an equitable public service that corresponds to increased economic opportunities. Additionally, LU-17.2 includes the consideration of potential health impacts associated with land use decisions in DDCs.

The proposed project supports SB 1000 goals more directly through the promotion of public facilities, namely schools, and sports fields, that support healthy physical activities of the community. The proposed project embodies the public's interest in having an informed citizenry, thereby promoting civil engagement through the combined effects of improving education facilities and the provision of a community venue. As a school, the proposed project could be considered a public good, since increased literacy rates lead to improved health outcomes[2], broader participation in democratic processes[3], reduction of crime and poverty rates[4], and educational capital[5] is an element of environmental sustainability and social equality[6].

[1] California Government Code 65302 (h) (1)
[2] Weiss, B. D., Hart, G., & Pust, R. E. (1991). The relationship between literacy and health. *Journal of health care for the poor and underserved*, *1*(4), 351-363. https://doi.org/10.1353/hpu.2010.0294
[3] Morais, Jose. (2017). Literacy and democracy. Language, Cognition and Neuroscience. 33. 1-22. 10.1080/23273798.2017.1305116.
[4] Walker-Dalhouse, Victoria. (2010). Homelessness, Poverty, and Children's Literacy Development.
[5] Omri, Anis. Hattem, Afi. (2020). How Can Entrepreneurship and Educational Capital Lead to Environmental Sustainability? *Journal of Structural Change and Economic Dynamics*. Volume 54, Pages 1-10.
[6] Vasconcelos, Clara, and Nir Orion. 2021. "Earth Science Education as a Key Component of Education for Sustainability" *Sustainability* 13, no. 3: 1316. https://doi.org/10.3390/su13031316

Letter 6

COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION
214 SOUTH C STREET
OXNARD, CALIFORNIA 93030

CITY OF OXNARD CALIFORNIA

Monday, November 21, 2022

Wael Saleh, C.P.A., M.B.A.
Assistant Superintendent, Chief Business Official
Rio School District
1800 Solar Drive
Oxnard, CA 93030

Subject: *City of Oxnard Comments on Draft Environmental Impact Report*
Project Name: *Rio del Valle Middle School Existing Campus Expansion Master Plan County of Ventura, California SCH# 2022060117*, Northeast of Rose Avenue and Collins Street (APN 144-0-110-445; -225; & -590)

Dear Mr. Saleh:

The City of Oxnard (City) has received and conducted a review of the Draft Environmental Impact Report 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 Environmental Impact Report (Draft EIR).

The City has three global comments on the Draft EIR, two notable items of concern, and additional detailed comments on the Draft EIR.

Global Comments

1. The Draft EIR incorrectly includes the proposed district transportation and bus maintenance and parking facility, as part of the school, and assumes compliance with applicable General Plan and Zoning policies and regulations. The proposed District Transportation and Bus Maintenance and Parking facility is not a Public School and cannot be considered as part of the adjacent school, and therefore is not consistent with the proposed General Plan land use designation (School) or the proposed Zoning (C-R). Per the City of Oxnard 2030 General Plan, the School designation is for "*for campuses of the elementary and secondary public school districts that serve Oxnard.*". Also, the C-R zoning designation only allows for *"Public schools-elementary, junior high, high school and college."*this does not allow for a District wide Transportation and Bus Maintenance and Parking facility. As a result, the conflicts, this would result in significant impacts, in

Comment 6-1

multiple impact areas including, but not limited to, Aesthetics, Agriculture and Forestry Resources, and Land Use Planning.

2. The Draft EIR continues to indicate that it is the District's position that pursuant to Government Code Section 53094(b), it can overrule City of Oxnard zoning authority as it relates to the proposed district transportation and bus maintenance and parking facility. However, Section 53094(b) does not apply to the district's transportation and bus maintenance and parking facility. Therefore, the City of Oxnard has approval authority over the transportation facility. As, noted in comment No. 1 above, the proposed zoning and land use designations do not permit the proposed transportation facility, and therefore the Project must be revised to request the appropriate general plan and zoning Designation. Comment 6-2

3. While each impact area's significance threshold states that "the impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines". Many of the significance thresholds from the 2017 City of Oxnard CEQA Guidelines[1] are not included or analyzed, therefore this statement is incorrect. Each section must be revised to include the appropriate significance threshold in order to be used by the City of Oxnard for the purposes of CEQA compliance. Comment 6-3

The City offers the following detailed comments to the Rio del Valle Middle School Expansion Draft EIR:

2.4 Project Description

Paragraph 5 on page 2-9, mentions the expansion of joint uses, including use of the site by the John F. Flynn Community Clinic and Sheriff's Department, however the Draft EIR fails to analyze the expansion of these uses or provide justification that these uses are not being expanded. These joint uses are not a school use, nor are they consistent with typical school uses. Additionally, the project proposes a significant increase in the amount of parking to accommodate these uses, as there is a proposed approximately 300 percent increase in the amount of parking, despite only 35 percent increase in staffing levels (70 staff to 95 staff). The proposed or potential expansion of these uses must be further discussed and analyzed in the Draft EIR. Comment 6-4

Paragraph 4 on page 2-9, indicates that partial work will begin, prior to obtaining all related entitlement for work under this proposed project. No work should occur for any portion of this project, until all required permits or approvals have been obtained to avoid unanalyzed impacts due to the inability to obtain one or more of the required permits or approval, which would result in necessary changes to the project and project description. Comment 6-5

Table 2-4. Conceptual Site Plan Summary fails to include any of the proposed improvements to the northern campus expansion area. This table must be revised to include those improvements. Comment 6-6

[1] https://www.oxnard.org/city-department/community-development/planning/ceqa/

Also, as the site plan includes the existing campus, however this table only includes only partial information. Table should be updated to include Existing areas to provide a complete site plan summary.

Comment 6-6 cont.

Utility Improvements (Sewer and Water)

The Draft EIR states that the sewer and water connections are proposed as part of Phase II, however these improvements will be required as part of the annexation and required to serve any new or expanded facilities constructed as part of Phase I. This is also inconsistent with the analysis and discussion provided in section 3.18 Utilities and Service Systems. Therefore, the Draft EIR must be revised to include this work as part of Phase I.

Comment 6-7

2.5 Required Permits and Approvals

Table 2.5 on page 2-18, fails to include and adequately discuss all of the required City of Oxnard entitlements necessary for this project to move forward. As previously communicated to the District this includes the following discretionary approvals:

- General Plan Amendment (to change the City Urban Restriction Boundary, SOAR land designation, Sphere of Influence, land use designation)
- Pre-zoning the property
- Tentative Tract Map and / or Lot Line Adjustment
- Special Use Permit for the School pursuant to the C-R zone requirements. Special Use Permit or Development Design Review Permit for the proposed District Transportation and Bus Parking facilities (The final permit type will be determined by the requested pre-zoning Zoning Designation).

Comment 6-8

On page 2-19, the District states they will be requesting General Plan Designation of School and Zoning designation of Community Reserve (C-R). The proposed District Transportation and Bus Maintenance and Parking facility is not a Public School and cannot be considered as part of the adjacent school, and therefore is not consistent with the proposed General Plan land use designation (School) or the proposed Zoning (C-R). Per the City of Oxnard 2030 General Plan, the School designation is for "for campuses of the elementary and secondary public school districts that serve Oxnard.". Also, the C-R zoning designation only allows for "Public schools-elementary, junior high, high school and college."this does not allow for a District wide Transportation and Bus Maintenance and Parking facility.

Comment 6-9

On page 2-19, the district indicates that this project would be exempt from the City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinance, however this determination is to be made by the City of Oxnard City Council. To date the City of Oxnard City Council has not made that determination, therefore this assumption is inaccurate. This section must be revised to clarify this determination is subject to City Council approval.

Comment 6-10

The Project Description must include a description of each of the requested General Plan Land Uses and Zoning Designations, Greenbelt Modifications, Sphere of Influence/CURB adjustments, and the proposed development associated with each. Comment 6-11

3.0 Environmental Analysis

3.1 Aesthetics

The environmental document must include an analysis of the visual impacts of the District Transportation and Bus Maintenance and Parking facilities. Paragraph 2 of Section 3.1.2.3, claims that there would be no significant impacts to the views of the Oxnard-Camarillo Greenbelt, however this section fails to analyze the fact that the proposed project would eliminate views of the Oxnard-Camarillo Greenbelt, from Rose Avenue adjacent to the project site. As indicated in the project description, the Project proposes to remove these areas from the Greenbelt, and block views with the development of the new School and District Transportation and Bus Parking facilities. Comment 6-12

Paragraph 4 of Page 3-10, states that the proposed project would be consistent with the General Plan and Zoning, with the proposed GPA, Pre-Zone, and Annexation, however this is incorrect. The proposed District Transportation and Bus Maintenance and Parking facility is not a Public School and cannot be considered as part of the adjacent school, and therefore is not consistent with the proposed General Plan land use designation (School) or the proposed Zoning (C-R). Per the City of Oxnard 2030 General Plan, the School designation is for "*for campuses of the elementary and secondary public school districts that serve Oxnard.*". Also, the C-R zoning designation only allows for *"Public schools-elementary, junior high, high school and college."*, this does not allow for a District wide Transportation and Bus Maintenance and Parking facility. As a result, the conflicts would result in a significant impact. Comment 6-13

Paragraph 4 of Page 3-11, The Draft EIR relies on significant landscaping for the screening of the parking and transportation facility in the discussion and provided photosims, however no details are provided on the quantity and the spacing of the landscaping. The Draft EIR must be revised to provide sufficient evidence that the proposed landscaping will be adequate. This should include a complete landscape plan and tree spacing requirements. Comment 6-14

3.2 Agricultural and Forest Resources

The Draft EIR states in section 3.2.2.3 Project impacts that the proposed project would not convert any of the northern campus to non-agricultural use, however the proposed project includes a request to change the a General Plan designation from Agriculture to School, as well as the construction of classroom facilities (outdoor lecture area). The Draft EIR fails to analyze the long-term impacts to the northern campus expansion area that will result from the land use and zone change. The land use and zone change will result in the loss of protections for this agricultural land, as it will allow for the development of alternative non agricultural uses. Additionally, with the growth-inducing impacts related to the land use and zone changes, roadway improvements and the extension of public services, it can be reasonably foreseen that this Project will potentially result in the loss of this agricultural land. As this area is to be used Comment 6-15

for school purposes, not for the purpose of agriculture, the new classroom area must be included in all calculations of the Agricultural areas to be lost. Revise impact analysis to include this area. Comment 6-15 cont.

The Draft EIR fails to appropriately mitigate the loss of the agricultural land. The proposed Mitigation (AG-1) does nothing to mitigate the physical loss of the over ten acres of agricultural land or the land use change to the over ten acre northern expansion area. Pursuant to CEQA guidelines section 15370, mitigation may take the form of avoidance, minimization, restoration, preservation, or compensation, including through permanent protection of such resources in the form of conservation easements. The proposed mitigation is insufficient and inconsistent with CEQA guidelines. The use of Agricultural Conversion mitigation fee or Purchase of Agricultural Conservation Easements, are not identified, discussed, or analyzed in the Draft EIR. As these are both a common and appropriate means of mitigating the loss of prime farmland, the Draft EIR must be revised to include appropriate mitigation including but not limited to an Agricultural Conversion mitigation fee or Purchase of Agricultural Conservation Easements. The fee or easement, compensating for the impact by replacing or providing substitute resources or environments, which qualifies as mitigation under CEQA. CEQA Guidelines Section 15126.4, requires that a EIR describe feasible mitigation measures which could minimize significant adverse impacts. As the project proposes to convert the Land use designations for both the northern and southern expansion areas, from agricultural to school or other non-agricultural use, CEQA requires that any proposed mitigation must mitigate for the loss of both areas. Appropriate mitigation must be determined in consultation with appropriate lead and/or responsible agencies, including the City of Oxnard. Comment 6-16

3.3 Air Quality

The Air Quality report provided in Appendix B, fails to include the proposed transportation facility. The Air Quality report must be updated to include the proposed bus facility as one of the proposed uses. School and Parking Lot, are not representative of the proposed transportation facility. Also, the Air Quality report fails to account for the entire project. The project includes the northern expansion area as well as improvement to the existing campus, however the analysis fails to include and analyze the impacts associated with these improvements. Therefore, the analysis provided in the air quality analysis is incomplete, and must be revised to analyze the whole of the project. Comment 6-17 Comment 6-18

Paragraph 4 of Page 3-41, states *"Operation of the proposed project is not expected to create objectionable odors since its primary function is to provide educational services."*. This fails to acknowledge or account for the impacts associated with the proposed transportation facility. This section must be revised to account for the transportation facility which is a significant portion of this project. Comment 6-19

Given the inaccurate and incomplete information, appropriate mitigation measures cannot be determined. Therefore, this section must be revised and appropriate mitigation measures considered. Subsequently, the revised Draft EIR must be recirculated for review of the analysis and mitigation measures. Comment 6-20

2.5 Cultural Resources

Paragraph 2 of Section 3.5.2.3, states "*the RVD buildings and infrastructure and a residential building constructed between 1947 and 1967. These resources are unrecorded and have not been evaluated for significance eligibility as historical resources under CEQA.*". This section relies on a Mitigation CUI - 1, to analyze whether the construction of this project would have a significant impact. The level of impact cannot be adequately determined without first identifying the significance of these resources. This deferred mitigation is not appropriate or permissible under CEQA, pursuant to CEQA Sections 15126.4(a)(1)(B) and 15126.4(b). The Draft EIR fails to identify why it is impractical or infeasible to provide the historical assessment and mitigation at this time. The historical assessment of these properties must be completed as part of the Draft EIR, so that adequate mitigation can be determined and applied to the Project. Additionally, the deferral of this mitigation to prior construction would fail to analyze any potential short-term or long-term impacts associated with the proposed land use change.

Comment 6-21

3.6 Energy

Paragraph 4 under Long-Term Energy Use states*"Actual vehicle fuel use comparisons for the current facilities, including the RDV Middle School and the District Transportation and Parking Facility, are not possible, as data for such calculations are not available. Instead, this evaluation considers current and projected transportation modes to infer potential energy use changes."*. In order to support these conclusions this information must be provided. The current assumptions, including *"The remaining 24 bus trips serving the rest of the RSD should at least not increase due to the new facility location and may in fact decrease because the new facility is more centrally located within the RSD."*, are unsubstantiated and therefore cannot be relied on for determining whether or not the proposed project would have a significant impact on energy use. The Draft EIR, must at a minimum provide a comparison of the daily bus travel distance from the existing facility vs. daily bus travel from the proposed transportation facility.

Comment 6-22

Additionally, this section states there will be a total of 30 bus trips, six for RDV and 24 for the other school, however only 24 buses are identified in the project description. Lastly, the analysis fails to account for the expansion in the number of buses currently serving the district. As this project will accommodate the future expansion the Draft EIR must analyze the impacts associated with the project increase (14 buses to 24 buses).

Comment 6-23

3.8 Greenhouse Gas Emissions

The Draft EIR incorrectly refers to the Appendix C, in the project impacts section, however that is the Cultural Resources study. The Air Quality report provided in Appendix B, fails to include the proposed transportation facility. The Air Quality report must be updated to include the proposed bus facility as one of the proposed uses. School and Parking Lot, are not representative of the proposed transportation facility. Also, the Air Quality report fails to account for the entire project. The project includes the northern expansion area as well as improvement to the existing campus, however the analysis fails to include and analyze the impacts associated with these improvements. Therefore, the analysis provided in the air quality analysis is incomplete, and must be revised to analyze the whole of the project.

Comment 6-24

3.9 Hazards and Hazardous Materials

The significance thresholds used are not consistent with the 2017 City of Oxnard CEQA Threshold, as many are missing and not analyzed. The threshold can be found at https://www.oxnard.org/wp-content/uploads/2017/06/CEQA-Guidelines-Color.pdf. Comment 6-25

Section 3.9.2.3 of the Draft EIR states *"Potential hazardous materials use and storage at the proposed Site in the past from agriculture practices is discussed in Section 3.9.1.1, is evaluated further below, and is mitigated with the implementation of Mitigation Measure HAZ-1."* However, this mitigation measure is not related to the previous agricultural uses. Appropriate mitigation must be provided to address the prior contamination associated with the agricultural uses. The environmental document must include further discussion of the proposed storage, use, and disposal of materials associated with the bus facility, such as fuel storage, storage of oils, paints, used parts, or other materials typically associated with automotive maintenance. Also, the report states that no remediation action is required so long as the northerly parcel is used for agricultural purposes. However, as improvements may be required on this site, the analysis must address if any further action would be required to allow for the improvements. The Draft EIR must also include further analysis of the Project's compliance with City and County emergency plans. Comment 6-26

Due to the incomplete analysis provided, this section must be revised and the Draft EIR recirculated to allow for adequate public review. Comment 6-27

3.11 Land Use and Planning

The Draft EIR incorrectly includes the proposed district transportation and bus maintenance and parking facility, as part of the school, and assumes compliance with applicable General Plan and Zoning policies and regulations. The proposed District Transportation and Bus Maintenance and Parking facility is not a Public School and cannot be considered as part of the adjacent school, and therefore is not consistent with the proposed General Plan land use designation (School) or the proposed Zoning (C-R). Per the City of Oxnard 2030 General Plan, the School designation is for "for campuses of the elementary and secondary public school districts that serve Oxnard.". Also, the C-R zoning designation only allows for "Public schools-elementary, junior high, high school and college."this does not allow for a District wide Transportation and Bus Maintenance and Parking facility. As a result, the conflicts, this would result in significant impacts, in multiple impact areas. Comment 6-28

3.13 Noise

The Draft EIR identifies the Project as having a less than significant impact; however, no studies have been prepared. A noise study is required for this Project. The noise assumptions based on the increase in ADT, fails to acknowledge the significant number of bus trips which are substantially louder than standard vehicles. The study and environmental document analysis must consider the noise and vibrations associated with the construction of the whole of the Project and all associated operations, including increased bus traffic and maintenance activities and equipment. Therefore, the Draft EIR fails to analyze the possible impacts associated with the operation of the District Transportation and Bus Parking and Maintenance facility. The analysis Comment 6-29

must consider the noise impact on all adjacent properties including the school and classroom facilities.

3.14 Population and Housing

The Draft EIR discussion only discusses potential growth inducing impacts associated with roadway improvement and the school use. However, the whole of the Project must be analyzed by the environmental document. As a result, in addition to the use and road improvements, the "growth inducing impacts" associated with the extension of the utilities, the general plan amendment and associated pre- zoning, the changes to the City Urban Restriction Boundary, the changes to the SOAR land designation, the green belt amendments, and changes to the City Sphere of Influence must be analyzed in the Draft EIR. Comment 6-30

3.16 Transportation

The Project will be required to comply with the City's adopted Bicycle and Pedestrian Master Plan, which identifies a Class II bike line along Rose Avenue. Comment 6-31

5.3.2 Alternatives Considered and Rejected

Pursuant to CEQA a EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

The Draft EIR fails to provide justification or reasoning for not analyzing any alternative locations for either the school expansion or the proposed transportation facilities. As these are exclusive uses, in that they have and can continue to operate separately, CEQA requires that the Draft EIR provide reasoning for concluding no feasible alternative locations exist for each component (the school expansions and the transportation facility). Comment 6-32

The alternative sites analysis must consider sites other than those listed in the 2030 General Plan, which were intended for new schools. As the proposed project requires annexation, general plan amendments, and pre-zoning, among other permits, the requirement for these permits would not solely be sufficient for determining a site's feasibility. The Draft EIR also fails to acknowledge alternative locations for the proposed Transportation facility. No justification was provided for not analyzing alternative transportation facilities. The Draft EIR states that six buses serve this school; however, that is only 25 percent of the proposed twenty-four buses. This statement fails to provide any analysis or conclusion to state why this means no other alternative locations are feasible. Comment 6-33

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

Water Resources

Since the project proposes to be annexed into the City of Oxnard, the existing campus and the proposed expansion (including the proposed agricultural field) shall use City water. The District shall account for all available water allocations ready to be transferred to the City to cover the Comment 6-34

existing and proposed school expansion areas consistent with the City Oxnard Municipal Code Article VI. Any transfers that need to occur for other projects shall occur outside the Campus Expansion Master Plan. Comment 6-34 cont.

Per the Urban Water Management Plan (UWMP), the City plans a 45% reduction in groundwater pumping by 2040, meaning the City will need to secure other water resources in the future. New projects not accounted for in the UWMP will cause an increase in the water projection requirements. Even if this project can allocate more groundwater rights to the City, adding more unaccounted projects will require the City to expend more resources in the future. Comment 6-35

Jensen 2022b Water Technical Memorandum:

1. The School District shall complete the water transfer for the Rio Urbana Project and update the memo with the available remaining water allocations. References to the Rio Urbana Project shall be removed from the technical memorandum. Comment 6-36
2. Available water allocation to be transferred shall account for the pumping reduction as required by Fox Canyon Groundwater Management Agency and the City of Oxnard 2022 Urban Water Management Plan. Provide and explain the number before and after the applied reduction(s). Comment 6-37
3. Per the 2022 UWMP, the City is required to reduce groundwater extractions by 45% by 2040. Explain how the proposed water allocation is supposed to address this reduction. Comment 6-38
4. The campus, existing and proposed, shall use city water. All water services shall connect to the City's water system. Comment 6-39
5. All water wells shall be decommissioned/destroyed unless directed otherwise by the City. Comment 6-40
6. The School District shall dedicate all water rights on the property of the existing and proposed campus expansion to the City. Comment 6-41

Wastewater

New projects outside the planned service area can push the treatment and operational requirements of the Oxnard Wastewater Treatment Plant (OWTP) beyond the estimated projection. The EIR shall analyze how the school expansion will impact the City's collection system, specifically, how it will remove existing sewer capacity downstream. Thereby taking available sewer discharge capacity from future development areas already within the City limits. Comment 6-42

Sewer Preliminary Investigation

1. The method of sewer generation rate calculations must be deemed acceptable by the City of Oxnard Public Works Department. Comment 6-43
2. Explain if the project's sewer generation, 4766 GPD, includes the existing and proposed expansion or just the expansion. Comment 6-44
3. Show in the memo how the peak flow of 0.018 CFS is calculated. Comment 6-45
4. Quantify and explain the overall sewer discharge impact that could potentially take away excess capacity for planned development downstream within the City limits. Comment 6-46
5. The report will need to be screened by the Public Works Department once quantities in the preliminary sewer study are found to be acceptable. Comment 6-47

Stormwater Comments

The project will drain to the Rose-Santa Clara Specific Plan and will impact the existing drainage system. The assumption that the project is permitted to release 1.1 CFS/acre is not supported without examining the previous hydrology report. The analysis shall encompass the entire school site and existing and expansion areas. The project may need to detain more than 1.1 CFS/acre to match what is permitted by the pre-determined downstream hydraulic grade line and capacity. Comment 6-48

On the Water Quality Design, the calculations worksheet step 1-11 shall account for the entire project area (11.1 acres) when used with the weighted composite C runoff coefficient of 0.446. Using the composite value of 0.446 with A-retain is not correct since the C-value for A-retain is 0.95. As proposed, the area of stormwater infiltration is severely undersized. Comment 6-49

Traffic Study Comments

1. The Rose Ave and Collins St. traffic signal is currently being operated and maintained by the County of Ventura. Revise the report to show the traffic signal at the intersection as within the County's jurisdiction. Comment 6-50
2. Exhibits on the report incorrectly show intersection No. 8 as Ventura Blvd & Auto Center Drive. Revise the report to show intersection No. 8 as Auto Center Dr & Collins St. Comment 6-51
3. Traffic growth from the data collection year (2021) to full capacity year (2029-2030 SY) shall be incorporated in the analysis. Traffic growth factor for the City of Oxnard shall be 1.2%. Comment 6-52
4. Accident analysis at the intersection of Auto Center Drive and Collins St. shall be included in the report. Project shall mitigate the impact of added school traffic at the intersection. Copy of Collision report is included in this memorandum. Comment 6-53
5. Since the project is part of a General Plan Amendment, traffic study shall be analyzed with the following scenarios: Comment 6-54
    a. Existing (roadway counts reflecting all completed and occupied construction projects to date).
    b. Existing, plus approved (projects which have been approved by the City but are not yet occupied), plus pending (projects for which applications have been filed and are currently being processed, but have not yet received final approval).
    c. Existing, plus approved, plus pending, plus project (the subject proposed project, not yet finally approved by the City)
    d. Year 2030
    e. Year 2030 plus project
6. Analyze intersections within the City of Oxnard's jurisdiction and intersections proposed to be annexed to the City of Oxnard using the City's traffic study methodology and traffic impact thresholds. Comment 6-55
7. Remove the text "County of Ventura" from the report's cover page. Comment 6-56
8. Since annexation to the City of Oxnard is requested by the project, revise the project description to show as such. Comment 6-57
9. Revise the project description to indicate the most recent site plan, if any. Revision shall include description of proposed agresses/ingresses to and from the project site. Comment 6-58

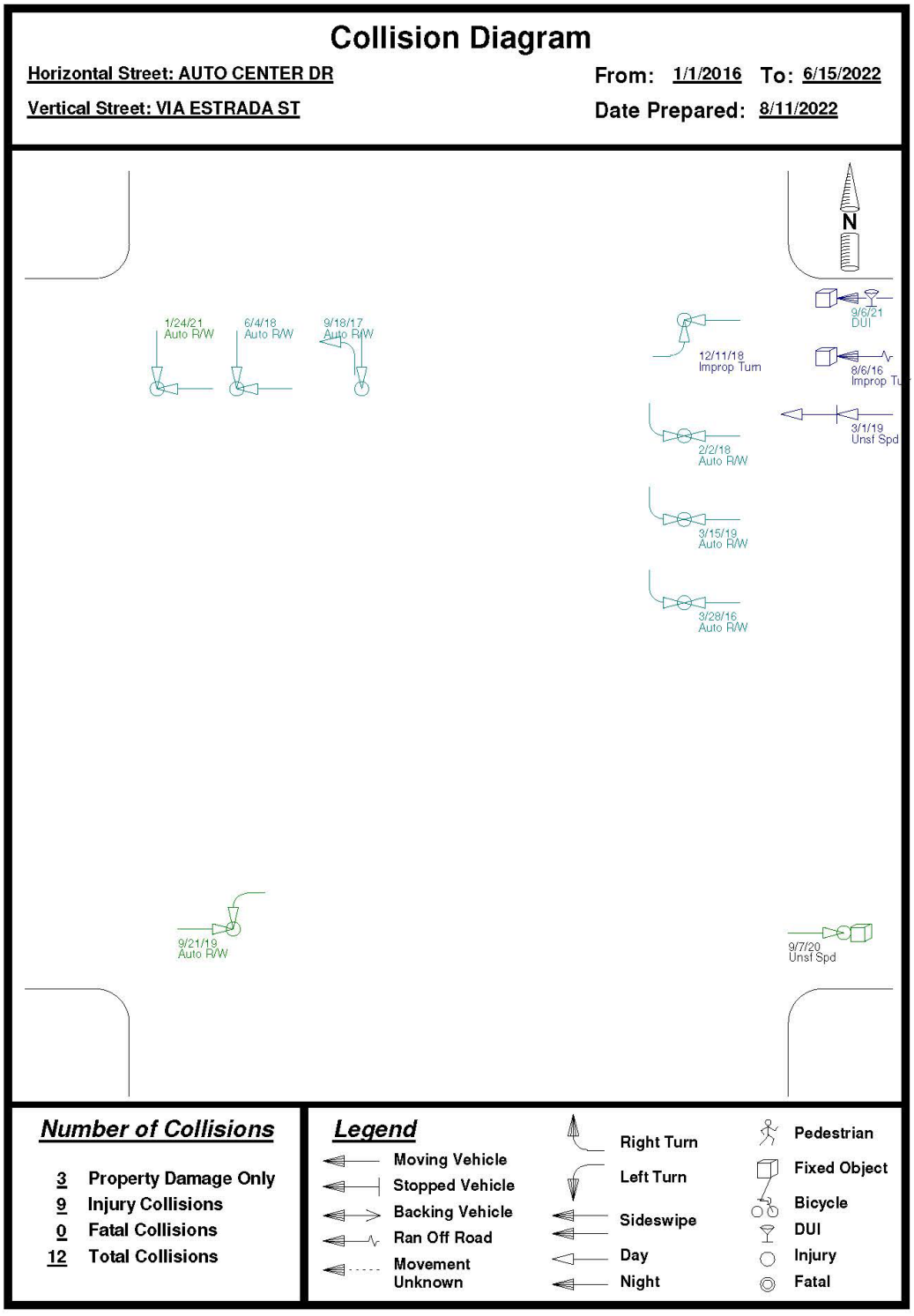
10. To improve traffic circulation of the project, traffic study shall evaluate and include a recommendation of providing a deceleration lane on all proposed and existing ingresses to the school site along Rose Ave. The deceleration lane could serve as a buffer for traffic that backs-up to the intersection during drop-offs and pick-up period. Comment 6-59
11. The traffic study shall evaluate if the existing right of way and road width of Collins St.'s project frontage can accommodate the school traffic, both passenger cars and school buses, with parking provisions on both sides of the street. Final cross section of Collins St. shall be consistent with City of Oxnard Standard Plate No. 100; Minor Residential. Comment 6-60
12. Traffic study shall develop a recommendation on how to eliminate the current student drop-off problems along the northbound shoulder of Rose Ave, south of the existing northerly school boundary. Comment 6-61
13. Traffic study shall evaluate the existing condition of the sidepath along the westerly side of Rose Ave, between Auto Center Drive and Collins St. and propose a safe route to school improvements. Comment 6-62
14. Clarify in the study report when the proposed Rose Ave Bike Lane project will be implemented and completed and how the project will tie in to the proposed annexation of Rose Ave to the City of Oxnard. Comment 6-63

Based on the information provided in this comment letter, the Draft EIR should be revised and recirculated pursuant to CEQA guidelines section 15088.5(a)(1-4). Thank you for the opportunity to comment on the Draft EIR. Please call Joe Pearson II, Planning & Environmental Services Manager, at 805-385-8272, or you can email at Joe.Pearson@oxnard.org if you have any questions.

Sincerely,

Joe Pearson II
Planning & Environmental Services Manager

cc: Ashley Golden, Assistant City Manager (via email)
Jeff Pengilley, Assistant Community Development Director (via email)
Tai Chau, Supervising Civil Engineer (via email)
Kenneth Rozell, Chief Assistant City Attorney (via email)
Joel Kirschenstein, Sage Realty Group (via email)


Collision Diagram
Horizontal Street: AUTO CENTER DR
Vertical Street: VIA ESTRADA ST
From: 1/1/2016 To: 6/15/2022
Date Prepared: 8/11/2022
N
1/24/21 Auto R/W
6/4/18 Auto R/W
9/18/17 Auto R/W
9/6/21 DUI
12/11/18 Improp Turn
8/6/16 Improp Tu
3/1/19 Unst Spd
2/2/18 Auto R/W
3/15/19 Auto R/W
3/28/16 Auto R/W
9/21/19 Auto R/W
9/7/20 Unst Spd
Number of Collisions
3 Property Damage Only
9 Injury Collisions
0 Fatal Collisions
12 Total Collisions
Legend
Moving Vehicle
Stopped Vehicle
Backing Vehicle
Ran Off Road
Movement Unknown
Right Turn
Left Turn
Sideswipe
Day
Night
Pedestrian
Fixed Object
Bicycle
DUI
Injury
Fatal

Color Legend - Highest Degree of Injury

Maroon = Fatal

Purple = Severe Injury

Green = Other Visible Injury

Teal = Complaint of Pain

Dark Blue = Property Damage Only

City of Oxnard
Traffic Engineering

From 1/1/2016 to 6/15/2022

Total Collisions: 12
Injury Collisions: 9
Fatal Collisions: 0

Collision Summary Report

8/11/22

AUTO CENTER DR & VIA ESTRADA ST

8555066 **3/28/2016** **17:05** Monday AUTO CENTER DR - VIA ESTRADA ST 0' Direction: Not Stated Daylight Clear Pty at Fault:1
Broadside Other Motor Vehicle Auto R/W Violation 21802A Hit & Run: No Complaint of Pain # Inj: 1 # Killed: 0

Party 1 Driver South Making Left Turn Female Age: 17 2000 CHEVROLET No Injury
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated
Party 2 Driver West Proceeding Straight Female Age: 53 2004 TOYOTA Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Deployed Not Stated

2016-00081660 **8/6/2016** **01:40** Saturday AUTO CENTER DR - VIA ESTRADA ST 100' Direction: East Dark - Street Lig Clear Pty at Fault:0
Hit Object Fixed Object Improper Turning 22107 Hit & Run: No Property Damage Only # Inj: 0 # Killed: 0

Party 1 Driver West Ran Off Road Female Age: 20 2015 HONDA Passenger Car, Station Wagon, Jeep
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: None Apparent Lap/Shoulder Harness Used Cell Phone Not In Use

8601546 **9/18/2017** **07:30** Monday AUTO CENTER DR - VIA ESTRADA ST 0' Direction: Not Stated Daylight Clear Pty at Fault:1
Sideswipe Other Motor Vehicle Auto R/W Violation 21801A Hit & Run: No Complaint of Pain # Inj: 1 # Killed: 0

Party 1 Driver North Making U Turn Female Age: 47 2015 VOLKSWAGEN No Injury
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated
Party 2 Driver South Proceeding Straight Female Age: 30 2013 NISSAN Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated

8599134 **2/2/2018** **16:04** Friday AUTO CENTER DR - VIA ESTRADA ST 0' Direction: Not Stated Daylight Clear Pty at Fault:1
Broadside Other Motor Vehicle Auto R/W Violation 21801A Hit & Run: No Complaint of Pain # Inj: 1 # Killed: 0

Party 1 Driver South Making Left Turn Male Age: 30 2000 FORD No Injury
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated
Party 2 Driver West Proceeding Straight Male Age: 42 2005 NISSAN Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated

8653134 **6/4/2018** **12:49** Monday AUTO CENTER DR - VIA ESTRADA ST 0' Direction: Not Stated Daylight Clear Pty at Fault:1
Broadside Other Motor Vehicle Auto R/W Violation 21802A Hit & Run: Felony Complaint of Pain # Inj: 2 # Killed: 0

Party 1 Driver South Proceeding Straight Not Sta Age: 2002 FORD No Injury
Veh Type: Passenger Car Sobriety: Impairment Not Kno Assoc Factor: Not Stated Not Stated Not Stated
Party 2 Driver West Proceeding Straight Male Age: 46 2005 FORD Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated

8776231 **12/11/2018** **13:06** Tuesday AUTO CENTER DR - VIA ESTRADA ST 0' Direction: Not Stated Daylight Clear Pty at Fault:1
Broadside Other Motor Vehicle Improper Turning 22107 Hit & Run: No Complaint of Pain # Inj: 2 # Killed: 0

Party 1 Driver East Making Left Turn Female Age: 38 2018 NISSAN Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Deployed Not Stated

AUTO CENTER DR & VIA ESTRADA ST

Party 2 Driver West Proceeding Straight Male Age: 63 2017 KIA Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Deployed Not Stated
8819590 **3/1/2019** **14:30** Friday AUTO CENTER DR - VIA ESTRADA ST 0' Direction: Not Stated Daylight Cloudy Pty at Fault:1
Rear-End Other Motor Vehicle Unsafe Speed 22350 Hit & Run: Misde Property Damage Only # Inj: 0 # Killed: 0

Party 1 Driver West Proceeding Straight Not Sta Age: 2018 TOYOTA No Injury
Veh Type: Passenger Car Sobriety: HBD Impairment Un Assoc Factor: Not Stated Not Stated Not Stated
Party 2 Driver West Stopped in Road Female Age: 58 2016 ACURA No Injury
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated
8819019 **3/15/2019** **16:53** Friday AUTO CENTER DR - VIA ESTRADA ST 0' Direction: Not Stated Daylight Clear Pty at Fault:1
Broadside Other Motor Vehicle Auto R/W Violation 21801B Hit & Run: No Complaint of Pain # Inj: 1 # Killed: 0

Party 1 Driver South Making Left Turn Female Age: 79 2019 TOYOTA No Injury
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Deployed Not Stated
Party 2 Driver West Proceeding Straight Female Age: 23 2014 JEEP Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated
8950218 **9/21/2019** **10:33** Saturday AUTO CENTER DR - VIA ESTRADA ST 0' Direction: Not Stated Daylight Clear Pty at Fault:1
Broadside Other Motor Vehicle Auto R/W Violation 21801A Hit & Run: No Other Visible Injury # Inj: 2 # Killed: 0

Party 1 Driver West Making U Turn Male Age: 24 2018 AUDI Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Deployed Not Stated
Party 2 Driver East Proceeding Straight Female Age: 38 2013 HYUNDAI Other Visible Injury
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Deployed Not Stated
9168190 **9/7/2020** **15:36** Monday AUTO CENTER DR - VIA ESTRADA ST 50' Direction: East Daylight Clear Pty at Fault:1
Hit Object Fixed Object Unsafe Speed 22350 Hit & Run: No Other Visible Injury # Inj: 2 # Killed: 0

Party 1 Driver East Proceeding Straight Male Age: 24 1995 - Other Visible Injury
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated
9220554 **1/24/2021** **16:20** Sunday VIA ESTRADA ST - AUTO CENTER DR 0' Direction: Not Stated Daylight Clear Pty at Fault:1
Broadside Other Motor Vehicle Auto R/W Violation 21802A Hit & Run: No Complaint of Pain # Inj: 1 # Killed: 0

Party 1 Driver South Proceeding Straight Male Age: 25 2019 - No Injury
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated
Party 2 Driver West Proceeding Straight Male Age: 35 2005 - Complaint of Pain
Veh Type: Passenger Car Sobriety: HNBD Assoc Factor: Not Stated Air Bag Not Deployed Not Stated
9321979 **9/6/2021** **20:50** Monday AUTO CENTER DR - VIA ESTRADA ST 60' Direction: East Dark - Street Lig Clear Pty at Fault:1
Hit Object Fixed Object Driving Under Influence 23152A Hit & Run: No Property Damage Only # Inj: 0 # Killed: 0

Party 1 Driver West Proceeding Straight Female Age: 50 2003 FORD No Injury
Veh Type: Passenger Car Sobriety: HBD Under Influenc Assoc Factor: Not Stated Air Bag Not Deployed Not Stated

Settings for Query:

Street: AUTO CENTER DR
Cross Street: VIA ESTRADA ST
Intersection Related: True
Sorted By: Date and Time

Letter 6	Joe Pearson, Planning and Environmental Services Manager City of Oxnard Community Development Department Planning Division

Response to Comment Letter #6 - City of Oxnard Comments on DEIR

Response to Comment 6-1

Should the City of Oxnard continue to consider the proposed Transportation and Operations facilities as a separate entity from the broader public school proposed at the site, the District believes that the following General Plan and Zoning designations would permit both components of the proposed project, and would allow for the proposed project as currently designed to be found consistent with applicable City land use designations and policies. We wish to note for the record that the District does not agree with the assertation that the transportation and operations facility is separate from the school site (see our Response to Comment 6-2 below), but present this proposal in the spirit of attaining mutually agreed upon Zoning and General Plan designations so that processing of the proposed project can proceed through the City of Oxnard.

Proposed General Plan Designation: Public/Semi-Public

Rationale: The Oxnard General Plan describes the Public/Semi-Public Designation as follows:

"Private, quasi-public, and public buildings and facilities owned by the City, County, State, Federal agencies, or other organizations that serve the general public such as a civic center, flood control channels, rail lines, community college, museum, performing arts center, community center, city yard, library, fire station, public school and /or district support facility, private and parochial school, cemetery, or hospital." (Oxnard General Plan, Land Use Designation Standards, Page 3-18)

Per the General Plan, the Public/Semi-Public Designation would permit both the proposed public school use (whole of the campus other than the Transportation and Operations facilities) and the proposed District support facility use (Transportation and Operations facilities).

Proposed Zoning Designation: Community Reserve (C-R)

Rationale: Oxnard Municipal Code Section 16-257(G) establishes that "Public schools- elementary, junior high, high school, and colleges" are a permitted use in the C-R zone with the approval of a SUP. Per the City's position to date, this would allow development of the proposed whole of the campus with the exception of the Transportation and Operations facilities.

Further, Municipal Code Section 16-256(F) states that "Accessory buildings, including other uses customarily incidental to a permitted use" are also permitted in the C-R zone. Should the City continue to consider the proposed Transportation and Operations facilities are separate from the proposed public school, the District asserts that transportation and operations facilities and use, such as the one proposed, can be considered a "customarily incidental" use to the proposed public school. In fact, multiple precedents exist within the City of Oxnard of transportation, operations, and maintenance facilities being co-located on public school sites within the C-R zone. Collectively, these facilities make a compelling case that transportation, operations, and maintenance facilities have been considered "customarily incidental" to public schools multiple times in the past by City staff.

On the following pages is an outline of transportation, operations, and or maintenance facilities that are either 1) co-located with school sites within the C-R zone or 2) located within C-R zones as standalone facilities. Please note, this list is not comprehensive and there may be additional instances of co-located transportation, operations, and or maintenance facilities with public schools.

Example 1: Ocean View School District; Mar Vista Elementary and Ocean View Junior High. APNs: 232-0-010-01, -02; 2382 Etting Road & 4300 Olds Road

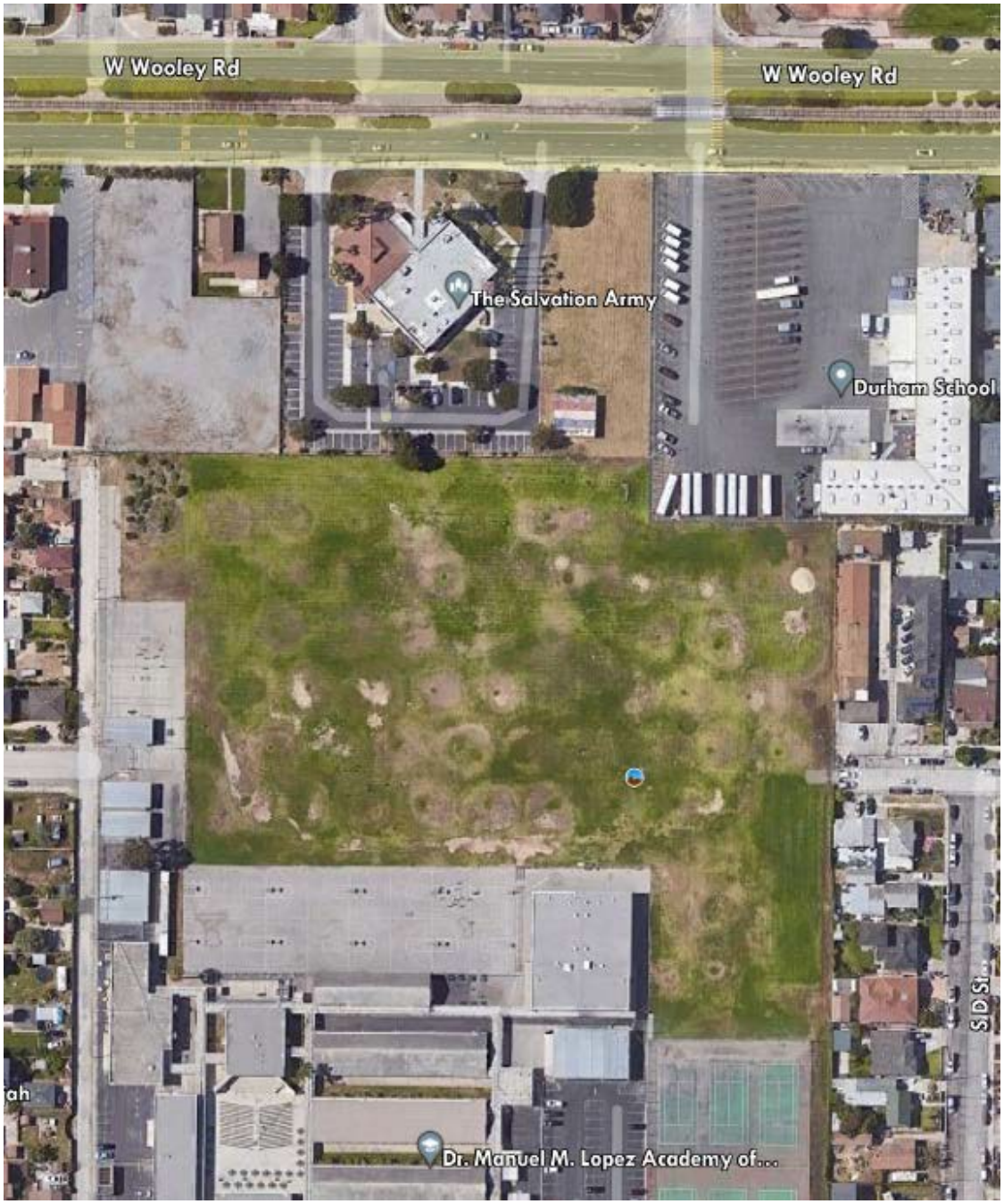
Zoning Designation: School (SCH)
General Plan Designation: Community Reserve (C-R)
Approx. Transportation/Operations Facility Area: 44,000 S.F.
Approx. Transportation/Operations Structure Area: 9,900 S.F.
Uses Present: Bus Storage, Vehicle Parking, Operations, Warehouses, Maintenance
Aerial Imagery:

Example 2: Ventura County Community College District, Oxnard College. APN: 224-0-012-24; 4000 S. Rose Avenue

Zoning Designation: School (SCH)
General Plan Designation: Community Reserve (C-R)
Approx. Transportation/Operations Facility Area: 82,000 S.F.
Approx. Transportation/Operations Structure Area: 20,000 S.F.
Uses Present: District Vehicle Parking, Operations, Warehouses, Maintenance
Aerial Imagery:

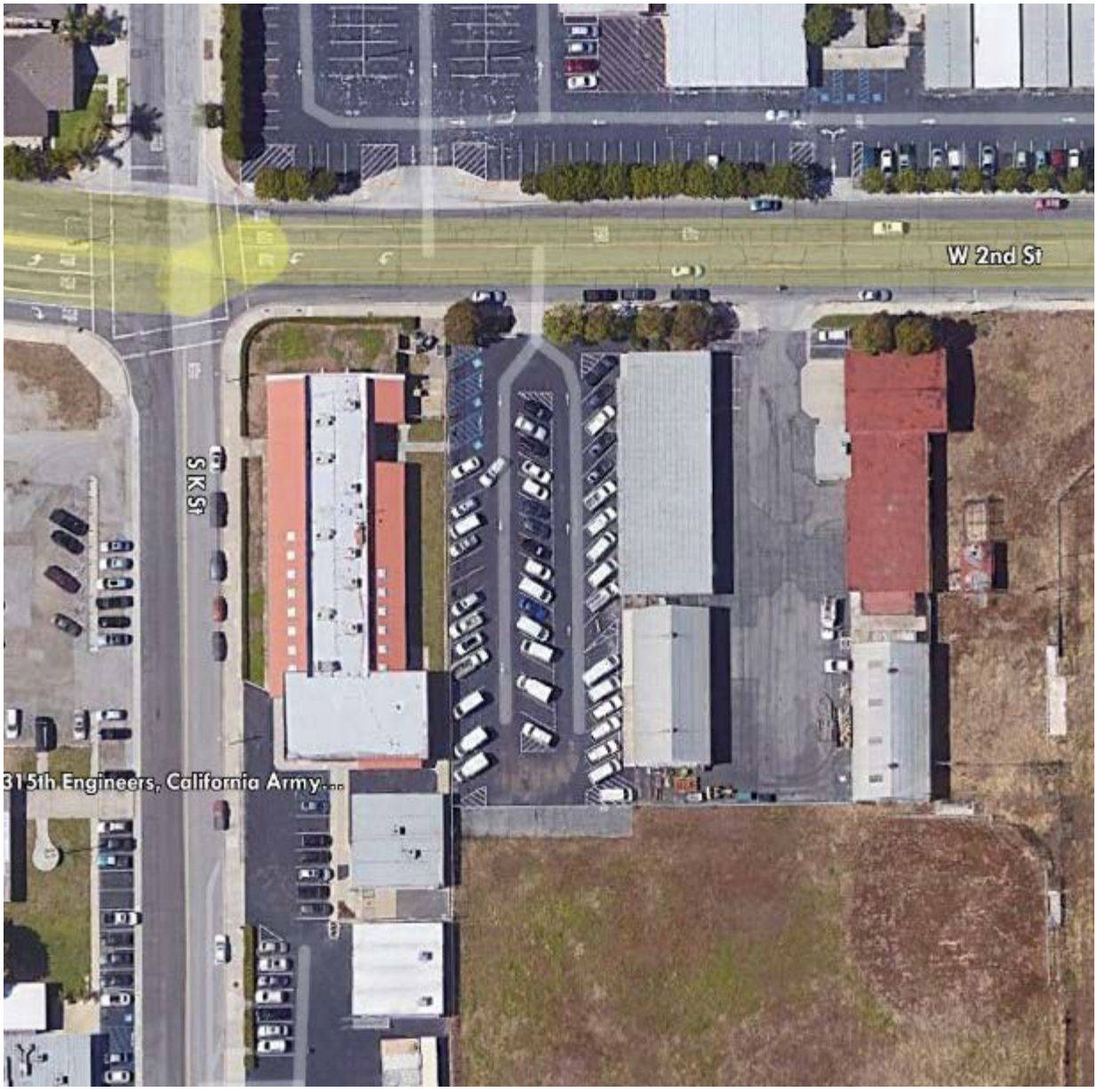
Example 3: Oxnard Elementary School District, Lopez Academy & District Warehouse APNs: 203-0-061-49, 203-0-050-32; 516 W. Wooley Road, 647 Hill Street

Zoning Designation: School (SCH)/Residential Low (RL)
General Plan Designation: Community Reserve (C-R)/ Single Family (R1)
Approx. Transportation/Operations Facility Area: 100,000 S.F.
Approx. Transportation/Operations Structure Area: 17,000 S.F.
Uses Present: Bus Parking, District Vehicle Parking, Operations, Warehouses, and Maintenance.
Aerial Imagery:



Example 4: Oxnard Union High School District, Maintenance & Vehicle Parking Facility APNs: 202-0-010-74, West 2nd Street

Zoning Designation: Park (PRK)
General Plan Designation: Community Reserve (C-R)
Approx. Transportation/Operations Facility Area: 60,000 S.F.
Approx. Transportation/Operations Structure Area: 18,000 S.F.
Uses Present: District Vehicle Parking, Operations, Warehouses, and Maintenance.
Aerial Imagery:



It is our hope that the potential precedents identified above will assist City staff with their research and aid in discussions of potential general plan and zoning designations for the RDV campus expansion. The District believes that these examples illustrate a strong history and record of permitting transportation, operations, and maintenance facilities in the C-R zone.

Response to Comment 6-2

The District understands, with respect to the new property to be acquired, that the District's proposed use is not in conformity with the existing General Plan and Zoning. Additionally, the District is not intending, at this time, to pursue an overruling of zoning, but rather is primarily focused on, and is in the process of submitting, a comprehensive development application with the City of Oxnard, in order to address the annexation of the Property into the City and the applicable General Plan and Zoning protocols, relative to the use of the property for government purposes.

While the District would disagree with assertions relative to its ability to overrule zoning pursuant to Government Code section 53094, that is not the course of the District at this time. The District does not dispute that Section 53094 does not allow the District to overrule zoning for purely non-classroom facilities, but it does permit the District to overrule zoning for facilities used for or related to student instruction. This project, as proposed, includes not only expanded classroom facilities, but also play fields and bus parking that are directly related to student instruction at the RDV campus. The play fields are used by the students for physical education and recess purposes, and the bus parking is used for buses that transport children to and from school, so that they may attend classes at the RDV campus. Six of the buses that will use the transportation component of the project are used to specifically transport students at RDV Middle School to and from the school, as well as for school athletic programs, field trips, special needs programs, and the newly proposed agricultural farm program.

The District would further note that the Site will be primarily for bus parking, with only basic maintenance performed onsite, with any significant maintenance and fueling activities occurring offsite through contracted services. The maintenance modular will house maintenance facilities for the RDV campus as a whole, not only buses.

It is also important to note that the District shifted its efforts to this Site, as opposed to the 10-acres to the north of the existing RDV School Site, based on recommendations of the City and Ventura County LAFCO. This site is situated at a location largely cut off from the other agricultural uses in the area, and is surrounded by school use to the north, and auto center facilities to the south.

Response to Comment 6-3

We reviewed the City's additional detailed comments on the Draft EIR (**Section 3.0 Environmental Analysis),** and Comment 6-25 (**Section 3.9 Hazards and Hazardous Materials**) was the only detailed comment that discussed the significance thresholds from the 2017 City of Oxnard CEQA Guidelines. Please see our Response to Comment 6-25.

Response to Comment 6-4

The RDV Gymnasium (GYM) on the existing RDV main campus is currently shared with the John F. Flynn Community Clinic and the Sheriff's Department as described in a Joint Use Agreement. RSD has no plans to expand these two joint uses in the GYM for this proposed project, so no additional analysis is required. The Draft EIR text (Paragraph 5 on page 2-9) will be modified to clarify that there will be no expansion of these two joint issues in the GYM.

In regard to the 300 percent increase in parking for the proposed project, the existing parking along with the ingress and egress at the middle school has always been inadequate, so RSD is proposing to assign overflow parking on the proposed new adjacent parking area (Parking Lot A) to address significant community health, safety, and welfare issues including congested traffic and parking conditions. The proposed project will also streamline RSD student transportation to improve safety and reduce vehicle miles traveled (VMT) and mitigate existing on-Site and off-Site parking impacts.

Figure 2-3 in the Draft EIR shows that the proposed parking supply consists of 339 standard spaces, 16 accessible spaces, and 24 bus spaces for a total of 379 spaces. Parking Lot A will contain 214 standard spaces and 10 accessible spaces for a total of 224 spaces. Parking Lot B contains 91 standard spaces and 4 accessible spaces for a total of 95 spaces. The DTPF contains 34 standard spaces, 2 accessible spaces, and 24 bus spaces for a total of 60 spaces. The County of Ventura parking requirement (Municipal Code Division 8, Article 6) for schools (Elementary, Junior High, Middle) is 1 space per 8 students of planned capacity. With a planned capacity of 1,069 students (819 current students plus 250 potential student increase), the parking requirements would be 134 parking spaces. Section 3.16 in the Draft EIR provides a discussion of existing transportation conditions and an analysis of potential impacts on traffic conditions from implementation of the proposed project. This section is based on information provided in the Traffic and Circulation Study (TCS) for the proposed project prepared by Stantec. The TCS is included in Appendix I of the Draft EIR. Incorporation of Mitigation Measures TRAF-1, TRAF-2, and TRAF-3 would reduce all potentially significant impacts related to transportation to a less than significant level.

Response to Comment 6-5

RSD has reviewed Paragraph 4 on page 2-9 and there is no discussion of partial work being performed in this paragraph. RSD will not perform work on this proposed project until all required permits and approvals have been obtained.

Response to Comment 6-6

There are no land use changes to the northern campus expansion area that are currently proposed as part of the proposed project. Approximately 10 acres on the northern portion of the project Site is currently utilized for agriculture and RSD plans to utilize this area as an outdoor working farm “classroom.” This working farm “classroom” is intended to partner with other school districts, provide produce for school food services, and market the surplus produce. No utility expansion is proposed in this expansion area. An outdoor lecture area and a small, paved pathway are planned for this area as shown in Figure 2-3. Possible fencing may be added for security.

As discussed in the Draft EIR, Section 3.2.2.3, the proposed project would not convert the approximately 10 acres on the northern campus expansion area of the project Site to a non-agricultural use as plans to utilize the Site as an outdoor working farm “classroom.” In order to provide additional clarification, the following Mitigation Measure AG-2 will be added to Section 3.2.2.6:

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.

Table 2-4 was intended to be a Conceptual Site Plan for the proposed project and not for the existing middle school campus. This table shows the buildings, parking lots, and recreational facilities being added to the middle school campus during construction of the proposed project. The existing main campus total classrooms, permanent building square footage, portable square footage, and parking spaces are shown in Table 2-3. Table 2-4 does not need to be updated to show the existing main campus areas.

Response to Comment 6-7

Section 3.18, Utilities and Service Systems of the Draft EIR has been updated to reflect the construction of sewer and water upgrades during Phase I of the proposed project.

Response to Comment 6-8

The City requests that Table 2-5 in the Draft EIR include the following discretionary approvals that are required by the City of Oxnard:

1. General Plan Amendment (to change the City Urban Restriction Boundary, SOAR land designation, Sphere of Influence, and Land Use Designation)
2. Pre-zoning the property
3. Tentative Tract Map and/or Lot Line Adjustment
4. Special Use Permit for the School pursuant to the C-R zone requirements.
5. Special Use Permit or Development Design Review Permit for the proposed District Transportation and Bus Parking facilities; the final permit type will be determined by the requested pre-zoning Zoning Designation.

Requested changes 3., 4., and 5. have been made to Table 2-6 in the Final EIR (Former Table 2-5 in Draft EIR). Pre-zoning was already included in Table 2-5 in the Draft EIR and further edits per request 2. above, are not necessary. A General Plan Amendment was also previously included in Table 2-5 in the Draft EIR and additional detail has been added to Table 2-6 in the Final EIR per requested change 1.

Response to Comment 6-9

The District believes that the Public/Semi-Public and Community Reserve (C-R) General Plan and Zoning designations would permit both components of the proposed project, and would allow for the proposed project as currently designed to be found consistent with applicable City land use designations and policies as described in Response to Comment 6-1. The District also asserts that transportation and operations facilities and use, such as the one proposed, can be considered a “customarily incidental” use to the proposed public school. In fact, multiple precedents exist within the City of Oxnard that are comprised of transportation, operations, and maintenance facilities being co-located on public school sites within the C-R zone. Collectively, these facilities make a compelling case that transportation, operations, and maintenance facilities have been considered “customarily incidental” to public schools multiple times in the past by City staff.

As shown above in Response to Comment 6-1, there are transportation, operations, and or maintenance facilities that are either 1) co-located with school sites within the C-R zone or 2) located within C-R zones as standalone facilities.

The District is primarily focused on, and is in the process of submitting, a comprehensive development application with the City of Oxnard, in order to address the annexation of the Site into the City and the applicable General Plan and Zoning protocols, relative to the use of the property for government purposes.

The District would further note that the Site will be primarily for bus parking, with only basic maintenance performed onsite, with any significant maintenance and fueling activities occurring offsite through contracted services. The maintenance modular will house maintenance facilities for the RDV site as a whole, not only buses.

It is also important to note that the District shifted its efforts to this Site, as opposed to the 10-acres to the north of the existing RDV Middle School Site, based on recommendations of the City and Ventura County LAFCO. This Site is situated at a location largely cut off from the other agricultural uses in the area, and is surrounded by school use to the north, and auto center facilities to the south.

Response to Comment 6-10

Text has been revised on page 2-19 as requested.

Response to Comment 6-11

The requested edits to the project description have been added to the end of Section 2.4 in the new Table 2-5 added in the Final EIR.

Response to Comment 6-12

The Draft EIR Aesthetics Section 3.1 did adequately analyze the impacts the proposed project would have on the views of the Oxnard-Camarillo Greenbelt, from Rose Avenue adjacent to the project Site.

As shown in Figure 3-4, views from Rose Avenue adjacent to the southern campus expansion area are mostly limited to the immediate foreground due to vegetation. As described in the Draft EIR, Section 3.1.2.3, *views of the Oxnard-Camarillo Greenbelt would primarily be from travelers on local roadways in the vicinity of the project Site including Rose Avenue. These are short duration viewers. Current views of the Oxnard-Camarillo Greenbelt, from Rose Avenue immediately adjacent to the project Site, are mostly limited to the immediate foreground due structures on the existing campus, fencing and raspberry production, including vegetation and shade structures, on the northern campus expansion area, and fencing, vehicle and farm equipment storage, residential use, and raspberry production, including vegetation and shade structures, on the southern campus expansion area. Views from Rose Avenue adjacent to the northern campus expansion area and the main campus would not change significantly: agricultural activities would continue at the northern campus expansion area as an outdoor working farm "classroom;" and the improvements to the main campus would result in facilities and structures similar to existing conditions. Views from Rose Avenue adjacent to the southern campus expansion area would change from vehicle and farm equipment storage, residential use and agricultural uses to school buildings, recreational facilities, and parking. While the change would result in a small reduction of views of agricultural uses, the improvements would be harmonious with the existing middle school facilities. Therefore, the proposed project would not result in significant impacts to views of the Oxnard-Camarillo Greenbelt.*

Response to Comment 6-13

See Response to Comment 6-1.

Response to Comment 6-14

As described in the City of Oxnard's CEQA Guidelines (City of Oxnard 2017), Chapter 1. Aesthetics and Urban Design, the City's methodology for determining the effect a proposed project would have on scenic resources and whether the effect would be significant involves describing three essential items or components of the visual resource analysis:

- The nature and quality of the visual resource;
- The viewpoint and the identity of the viewers and their sensitivity to changes in the view; and
- The effect of the proposed project in altering the nature of the view.

The City's methodology does not mention the use of and/or state that impacts to scenic resources can only be confirmed with landscape plans.

The three essential items or components of the visual resource analysis, as defined in the City's methodology, were described in the Draft EIR, Section 3.1 Aesthetics. As described in the Draft EIR, Section 3.1.2.3, *The project will be bordered by landscaping. The incorporation of landscaping would result in these features being the most visible elements along public street frontages.* The Draft EIR, Section 3.1.2.3, also presents preliminary views of project landscaping as shown in Figure 3.8. Final landscaping plans will be consistent with the City's landscape standards (City of Oxnard 1988). This information provides an adequate discussion of the effect of the proposed project would have on scenic quality and provides sufficient information to determine the less than significant impact.

Response to Comment 6-15

As discussed in the Draft EIR, Section 3.2.2.3, the proposed project would not convert the approximately 10 acres on the northern campus expansion area of the project Site to a non-agricultural use as plans to utilize the Site as

an outdoor working farm "classroom." In order to provide additional clarification, the following Mitigation Measure AG-2 will be added to Section 3.2.2.6:

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.

Also as discussed in the Draft EIR, no utility expansion is proposed in the northern campus expansion area. As discussed in the Draft EIR, Section 4.2, the project would not remove physical obstacles to population growth, such as the construction of a new road into an undeveloped area, a major infrastructure expansion, or residential development and no significant impacts related to direct growth inducement would occur.

Therefore, the Draft EIR adequately analyzed the long-term impacts to the northern campus expansion area, in that as the proposed project would not convert the northern campus expansion area to a non-agricultural use, no significant impacts would occur.

Response to Comment 6-16

In regards, to the land use change to the over 10-acre northern campus expansion area, see Response to Comment 6-15 above.

As discussed in the Draft EIR, Section 3.2.2.3, *The City has determined that conversion of agricultural land is a project-level impact and requires a mitigation measure to offer the topsoil for removal to another farm operation, if feasible, as a partial mitigation for the loss of prime farmland impact (City of Oxnard 2012). The City has policies that encourage establishment of a farmland protection program and use of conservation easements and land banking to protect continued agricultural uses throughout the City's SOI and policies and programs that support existing agricultural buffers (such as the SOAR Ordinance) in order to reduce or slow further loss of agricultural resources, however, these policies do not offset an actual loss of farmland acreage. No additional feasible mitigation measures are currently available to reduce this impact to a less than significant level, therefore this impact would remain significant and unavoidable (City of Oxnard 2009).*

As discussed in the Draft EIR, Section 3.2.2.3, impacts were identified associated with the proposed project's conversion of approximately 7.9 acres of Prime Farmland and 2.9 acres Farmland of Statewide Importance in the southern campus expansion area. However, of these 10.8 acres, only 8.7 acres are actively used for agricultural production. As discussed in the Draft EIR, Section 3.2.2.3, the proposed project would not convert the approximately 10 acres on the northern campus expansion area of the project Site to a non-agricultural use. And as discussed in Response to Comment 6-15, to provide additional clarification, the District will commit to retaining the agricultural use of the northern campus expansion area for a minimum of 10 years. Therefore, the commitment of the 10 acres on the northern campus expansion area will provide mitigation for the loss of the prime farmland in the southern campus expansion area. The provision of Mitigation Measures AG-1 and AG-2 provides an appropriate level of mitigation.

Response to Comment 6-17

The CalEEMod calculations included in Appendix B have been updated to properly account for air emissions resulting from both the middle school expansion and the proposed bus parking facility. While the land use headings in CalEEMod remain as School and Parking Lot, input parameters (e.g., building and parking surface areas and trip generation rates) have been updated to reflect air emissions from the proposed middle school expansion and the transportation facility.

Response to Comment 6-18

The CalEEMod calculations included in Appendix B have been updated to properly account for air emissions resulting from both the middle school expansion and the proposed bus parking facility. While the land use headings

in CalEEMod remain as School and Parking Lot given CalEEMod labeling constraints. However, the footprints, metrics, building and parking surface areas, and trip generation rates have been updated to reflect air emissions from the middle school expansion and the transportation facility.

Response to Comment 6-19

The proposed transportation facility would be separated from the school campus by a fence and the bus parking lot would be separated from the nearest middle school structure by more than 300 feet. Additionally, buses in California are regulated through CARB's On-Road Regulation which requires that all school buses be fitted with level 3 PM filters, the highest level of particulate matter control technology available, capable of reducing PM emissions by 85 percent. Thus, the proposed controls (i.e., fence, distance to nearest sensitive receptor structure, and state regulation of PM control in school buses) would minimize the potential for odors associated with the operation of buses to impact students and faculty at RDV.

Response to Comment 6-20

Air quality mitigation measure are not required since all air emissions for the proposed project are significantly below the Ventura County APCD emissions thresholds. Emissions measures are rather implemented as a form of compliance with requirements established under Ventura County APCD rules, the City of Oxnard General Plan, and the California Air Resources Board's off-road regulations. The revised Draft EIR does not need to be recirculated for review of the analysis and mitigation measures.

Response to Comment 6-21

Evaluation of potential historic resources cannot be conducted prior to project approval and purchase of the land. Therefore, mitigation measures addressing unknown significance of potential historic resources cannot be practicably formulated according to the current environmental review schedule. Although initial design plans identified potential modifications to the two on-site historic era-built environment resources, final design and construction shall be dependent on the results of the evaluation of those resources. Therefore, final details of the design and mitigation affecting the structures in question will be postponed until they have been evaluated according to the significance criteria set forth for historic resources under CEQA Guidelines Section 15064.5, according to CUL-1. Mitigation Measure CUL-4 (see below) has been added to ensure that, subsequent to CUL-1, appropriate mitigation would be formulated and conducted to ensure that any significant adverse changes to any identified historic resources would be reduced to less than significant prior to final design and construction.

This is allowable under CEQA Section 15126.4(a)(l)(B), which allows for deferred formulation of mitigation measures when it is impractical or infeasible to include the details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. If any resources are deemed to be historically significant by Mitigation Measure CUL-1, then Mitigation Measure CUL-4 commits RSD to adopting specific performance standards that the mitigation would achieve, namely the avoidance of any significant adverse changes to the resource. The avoidance of significant adverse changes to the potential cultural resources in question could be achieved through modification of final design to incorporate appropriately formulated mitigation that is dependent on the results of the evaluation, in compliance with CEQA Section 15126.4(b). It is also possible that Mitigation Measure CUL-4 would require that the final design not alter the buildings in question at all. Therefore, no significant impacts to historic resources would occur with implementation of Mitigation Measures CUL-1 and CUL-4.

Mitigation Measure CUL-4: Historic Resources Protection. 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.

Response to Comment 6-22

Please see the Response to Comment 5-11 for clarifications on the number of buses in the District's student transportation fleet and the number of bus routes (or bus trips) provided by the District per day. The Draft EIR will be corrected to reflect the actual number of bus routes serving RDV daily (six in the morning and six in the afternoon, or 12 per day) and the actual number of bus trips serving other schools (seven in the morning, four at midday, and seven in the afternoon, or 18 per day).

Based on information provided by the District, the 12 daily bus routes serving RDV will each cover an average of 1.5 fewer miles to the proposed location than they would have to the former bus parking facility. That is a reduction of 18 miles per day that these buses will travel. Based on the location of the other schools served by District buses, when compared to the former bus parking facility and to the proposed bus parking facility (adjacent to RDV), the net change in distance traveled by buses is 3 miles fewer, per day. Thus, the combined reduction in bus mileage is 21 miles per day if traveling from the proposed bus parking facility.

Response to Comment 6-23

Reiterating information provided earlier in Response to Comments 5-11 and 6-22, the District currently owns 17 buses. Buses are active during three periods of the day: morning, midday, and afternoon. In the morning and afternoon periods, a maximum of 13 buses are in use and 4 are spares but provide backup capacity. During the midday period only 4 buses are in use. Each bus "use" during these periods represents a route. During the two periods of maximum bus use (morning and afternoon) six routes serve transport needs for RDV and seven routes serve other schools in the District. During the midday period four buses serve other schools, and not RDV. Thus, there are a total of 12 daily bus routes for RDV and 18 daily bus routes for other RSD schools for a total of 30 daily bus routes.

As current projections stand, the District does not anticipate increasing the total number of buses of 17 in their fleet for the near future. In addition, they do not anticipate the need to increase the number of bus routes from the daily total of 30. Finally, there are 24 proposed bus parking spots included in the design for the proposed bus parking facility adjacent to RDV. This will allow some flexibility in management and parking of 17 buses at the proposed bus parking facility.

Response to Comment 6-24

- Errata:
- The reference to "Appendix C" under the Summary of Project Impacts, Mitigation Measures and Level of Impact After Mitigation Proposed Rio del Valle Middle School Existing Campus Expansion, County of Ventura, CA Rio School District, Section 3.8 Greenhouse Gas Impacts, first row, second column, page E-62, should say "Appendix B."
- The reference to "Appendix C" under Section 3.8.2.3, first paragraph, page 3-79, should say "Appendix B."
- The CalEEMod calculations have been updated to properly account for air emissions resulting from both the middle school expansion and the proposed bus parking facility. While the land use headings in CalEEMod remain as School and Parking Lot given CalEEMod labeling constraints. However, the footprints, metrics, building and parking surface areas, and trip generation rates have been updated to reflect air emissions from the middle school expansion and the transportation facility.
- Renovations were approved before this proposed project was under consideration and were granted a CEQA exemption through the California Department of General Services, Division of the State Architect

(DSA). However, they are also accounted for and their associated emissions calculated in the CalEEMod emissions calculation report included in Appendix B and their impacts discussed in the Draft EIR.

Updated Air Emissions Impact Analysis Tables 3-11, 3-12, and 3-16 are included below:

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

Project Phase	VOCs	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Construction Emissions 2023	0.83	4.00	33.44	0.06	8.34	4.57
Construction Emissions 2024	13.08	3.97	19.22	0.04	0.71	0.23
Threshold Significance	None	None	None	None	None	None
Significant?	No	No	No	No	No	No

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

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

Project Phase	VOCs	NOx	CO	SO_x	PM_{10}	$PM_{2.5}$
Operation Emissions	1.81	3.11	9.37	0.03	3.25	0.89
Threshold of Significance	None	25	25	None	None	None
Significant?	No	No	No	No	No	No

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

Table 3-16. Annual Greenhouse Gas Emissions

Phase	CO_2e (MT)
Construction 2023	427
Construction 2024	191
Operation (per year)	519
Threshold	10,000
Significant?	No

Response to Comment 6-25

The two significance thresholds discussed in the Sections 3.9.2.2 and 3.9.2.3 of the Draft EIR are from the 2022 CEQA Guidelines as follows, significance threshold Section VIII c) and significance threshold Section VIII d) as follows.

- ***2022 CEQA Guidelines significance threshold VIII c)*** *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*
- ***2022 CEQA Guidelines significance threshold VIII d)*** *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The corresponding significance thresholds in the 2017 City of Oxnard CEQA Guidelines to significance thresholds c) and d) of the Section VIII of the 2022 CEQA Guidelines are significance thresholds 3 and 4 of Section 8.2. The 2017 City of Oxnard CEQA Guidelines significance thresholds are worded slightly differently than those in 2022 CEQA Guidelines as shown in the underlined and stricken out text below:

- ***2017 City of Oxnard CEQA Guidelines significance threshold Section 8.2, 3****. Would the project emit hazardous substances or involve handling hazardous or acutely hazardous substances or waste within one---quarter mile of an existing or proposed school, in quantities or a manner that would create a substantial hazard*?
- ***2017 City of Oxnard CEQA Guidelines significance threshold Section 8.2, 4****. Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant substantial hazard to the public or environment?*

The Draft EIR was revised to replace significance thresholds c) and d) of the Section VIII of the 2022 CEQA Guidelines with significance thresholds 3 and 4 of Section 8.2 of the 2017 City of Oxnard CEQA Guidelines in Sections 3.9.2.2 and 3.9.2.3.

The remaining Hazards and Hazardous Materials significance thresholds of the 2017 City of Oxnard CEQA Guidelines that were not analyzed in the Draft EIR were screened out and eliminated from further analysis in the IS for the proposed project. The Draft EIR was revised to state this.

Response to Comment 6-26

The statement in Section 3.9.2.3 of the Draft EIR "Potential hazardous materials use and storage at the proposed Site in the past from agriculture practices is discussed in Section 3.9.1.1, is evaluated further below, and is mitigated with the implementation of Mitigation Measure HAZ-1", is in error and should have referred to Mitigation Measure HAZ-2. Section 3.9.2.3 of the Draft EIR was revised to state "Potential hazardous materials use and storage at the proposed Site in the past from agriculture practices is discussed in Section 3.9.1.1, is evaluated further below, and is mitigated with the implementation of Mitigation Measure ~~HAZ-1~~ HAZ-2".

No vehicle maintenance will be performed at the future new RDV bus parking facility. All vehicle maintenance (oil changes, etc.) will be performed at Gibbs Truck Center (2201 E. Ventura Blvd Oxnard, CA 93036) as is done currently. The buses will be fueled at SC Fuels (3815 E. Vineyard Avenue Oxnard, CA 93036) as is done currently. No automotive maintenance products such as motor and transmission oil, paint, or fuel will be stored or disposed of at the Site. Section 3.9.2.3 of the Draft EIR has been revised to state this.

Section 3.9.2.3 of the Draft EIR has been revised to state:

"Tetra Tech determined that no further action is recommended for the 10-acre northern campus expansion area for as long as the northern campus expansion area is used for agricultural production. 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. With the implementation of Mitigation Measure HAZ-3, the proposed project would have a less than significant impact."

Mitigation Measure HAZ-3 has been added to Section 3.9.2.5 of the Draft EIR as follows.

Mitigation Measure HAZ-3: 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.

The *Ventura County Multi-Hazard Mitigation Plan* (County of Ventura 2015) was adopted by the City of Oxnard to serve as a guide for the City's response to emergencies/disasters. The project is in compliance with the *Ventura County Multi-Hazard Mitigation Plan.* Section 3.9.2.3 of the Draft EIR has been revised to state this.

The City of Oxnard Fire Department leads emergency response activities within City of Oxnard that would include responses to large hazardous spills. The *Ventura County Multi-Hazard Mitigation Plan* describes the coordination of response efforts. The responsibility for responding to and remediating spills would be similar to existing conditions. Section 3.9.2.3 for the Draft EIR has been revised to state this.

Response to Comment 6-27

Sections 3.9.2.2, 3.9.2.3, and 3.9.2.5 of the Draft EIR have been revised to address this comment as described above in Response to Comments 6-25 and 6-26. These revisions set forth do not provide any significant new information within the meaning of CEQA Guidelines Section 15088.5. Therefore, the Draft EIR does not need to be recirculated for adequate public review.

Response to Comment 6-28

See Response to Comment 6-1 and 6-2.

Response to Comment 6-29: Section 3.13.2.3 of the Draft EIR discusses the noise impacts associated with the increase in traffic from the proposed project. This is inclusive of the 17 buses identified for the proposed project. This section also discusses the operational noise impacts associated with the rooftop mechanical equipment proposed for the project. This is inclusive of the rooftop mechanical equipment associated with the District Transportation and Bus Parking and Maintenance facility. No other operational sound sources are proposed for the project. Therefore, an additional noise study for the proposed project is deemed unnecessary.

Response to Comment 6-30

These issues are addressed elsewhere in Draft EIR, primarily in Section 3.2, Agricultural Resources, thereby addressing the "whole of the project" CEQA requirements.

While it is hereby acknowledged the aforementioned issues should be addressed within the Final EIR, Section 3.14, as-written, directly addresses the questions of "*will the project induce substantial unplanned population growth in an area," or "would the project displace substantial numbers of existing people or housing,*" in that the proposed project will not result in either of the conditions required to meet the threshold of significance.

The proposed land use and zoning changes would result in loss of protections, such as through SOAR, of the agricultural land on both the southern and northern campus expansion areas which could indirectly result in growth inducing impacts such as roadway improvements and extension of public services. However, no utility expansion is proposed in the northern campus expansion area, which is intended to be used as a working farm "classroom." Any plan for expansion of utilities would have to undergo subsequent environmental review and regulatory permitting for growth inducement at that time. The proposed project, though, would not induce substantial unplanned population growth in the area. The "growth" in the form of expanded middle school facilities and their

corresponding student and faculty populations would occur primarily on the existing middle school campus footprint and would be a transfer of an existing middle school aged population currently residing within the District with a small percentage of new students and faculty added to the middle school.

It is acknowledged the northern and southern campus expansion areas are located within the County of Ventura's SOAR Ordinance and removing parcels from the County's SOAR ordinance can require a vote of the people. In this case, if the requested annexations are approved, the northern and southern campus expansion areas currently under agriculture would fall under the City of Oxnard's SOAR ordinance unless the City Council determines the proposed project, as a school facility, should not be subject to the City's SOAR ordinance and a corresponding vote of the people.

The conversion on the southern campus expansion area from agricultural use to a District bus parking facility is infill between the existing campus footprint and the auto mall located south of Collins Street. Replacement of these facilities by the proposed project neither induces substantial growth nor displaces substantial numbers or people or housing and therefore does not exceed the thresholds of significance for Population and Housing.

Response to Comment 6-31

The proposed project will comply with the City's adopted Bicycle and Pedestrian Master Plan.

Response to Comment 6-32

RSD studied several potential middle school sites and other alternatives and determined that the proposed project Site to be the one that is best available, and the only one that would accommodate all of the improvements to the RDV campus as well as the transportation and parking components. These alternative sites included the following:

- Existing nine RSD campuses including RDV;
- Beedy Street (property located near intersection of Beedy Street and E. Vineyard Avenue in Oxnard, CA);
- Santa Clara Chapel Vacant Land (1333 Ventura Boulevard Oxnard, CA 93036);
- RSD-owned property adjacent to fire station cul-de-sac (property located near 3300 Turnout Park Circle Oxnard, CA 93036 (Oxnard Fire Department Station 7));
- City Old and New Transportation Yard (property located near 201 E. Fourth Street Oxnard, CA 93030); and
- Miscellaneous properties listed for sale in Oxnard and Ventura County.

One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost effective and District-wide individual school attendance boundary adjustments will be made as needed in the future. These alternative sites would not meet two of the Project Objectives of providing new facilities that meet the RSD's educational specifications and building school facilities that reflect the wise and efficient use of limited land resources. Therefore, alternative site locations were considered but rejected by RSD.

RSD studied two alternative sites for the proposed bus transportation facility. The first site is a 1-acre parcel owned by RSD (property located near 3300 Turnout Park Circle Oxnard, CA 93036 (Oxnard Fire Department Station 7)) and leased to the City of Oxnard (50-year lease) for storage of maintenance equipment. This site was eliminated because RSD could not reach an agreement with the City for required site improvements to park the school buses at this site. The other site was a bus parking facility located at the Oxnard School District Transportation Center (near 516 W. Wooley Road). This site was eliminated because RSD could only negotiate a 1-year lease agreement with Oxnard School District so this site would just be a temporary bus parking facility.

Section 5.3.2 of the Draft EIR has been revised to address this comment as described above.

Response to Comment 6-33

Please see Response to Comment 6-32 which discusses the alternative sites analysis for both the school expansion and proposed bus transportation facility.

RSD currently has 17 buses. They use 13 buses for transporting students and the other 4 buses are used as spares. RSD has no plans for adding buses in the future. The 24 future bus parking spaces will be used to allow additional parking space for the current 17 buses.

Sections 2.4 and 5.3.2 of the Draft EIR has been revised to address this comment as described above.

Response to Comment 6-34

This comment is hereby noted and water allocations for the proposed and other projects shall be transferred as requested to be consistent with the City of Oxnard Municipal Code Article VI.

Response to Comment 6-35

It is noted that this proposed project is not specifically accounted for in the latest UWMP, and that transferring pumping rights will be reduced by 45% in the near future. However, the UWMP does account for 1,600 AFY between 2021 – 2025 (section 4.2.4). This increase is due to City growth, and we assume this proposed project is included in unspecified but expected City growth.

Also note the revised technical memo included in Appendix H of the Final EIR for water use and pumping transfers show the future reduction of water use on the RDV campus.

Response to Comment 6-36

It is understood that water must be transferred for this proposed project. The technical memo included in Appendix H of the Final EIR will be revised to remove Rio Urbana references and show the remaining pumping credits the District will retain.

Response to Comment 6-37

Pumping for this Site was 30.357 AFY and demand will now be 9.527 AFY with the expansion and existing RDV campus. This will be more clearly stated in the technical memo included in Appendix H of the Final EIR.

Response to Comment 6-38

The proposed water allocation is a conservative assumption of the future use of the RDV campus. There are many factors that are unknown, and will change, between now and 2040. The District, like all other users, will need to follow the new guidelines as they become available. At the time of this proposed project, the District will be replacing grass fields with synthetic turf to reduce more than 27 AFY of pumped water use.

Response to Comment 6-39

The entire RDV campus will be served by City of Oxnard water, and wells will not be used. This will be stated in the technical memo included in Appendix H of the Final EIR.

Response to Comment 6-40

It is understood that onsite well(s) will need to be properly destroyed, and this will be stated in the technical memo included in Appendix H of the Final EIR.

Response to Comment 6-41

It is understood that the District will transfer all needed water right with this proposed project. This statement will be clear in the technical memo included in Appendix H of the Final EIR.

Response to Comment 6-42

Section 3.2 of the Sewer Preliminary Investigation Report included in Appendix H of the Final EIR indicates that the proposed sewer generation rates from the campus expansion will not create a measurable impact on downstream infrastructure. The following revisions have been made to Section 3.2 for clarity:

"The increase in sewer flow due to the proposed campus expansion was analyzed to show its downstream *impact on ~~existing~~* City *infrastructure. It was assumed that the sewer main ~~is~~* will be *at the maximum acceptable depth/diameter ratio for peak flows ~~in the existing condition~~* when it reaches its projected ultimate demand*. The increase in sewer flow created by the proposed expansion was ~~compared~~* added *to the assumed ~~existing condition~~* ultimate demand *flowrate…"*

Response to Comment 6-43

The District understands that additional coordination with the City's Public Works Department will be required prior to construction of the proposed project.

Response to Comment 6-44

The calculations presented in the Sewer Preliminary Investigation Report consider sewer rates generated by the proposed campus expansion project only. The existing RDV campus was connected to City sewer in Rose Avenue in 2000. The flow monitoring program conducted by Kennedy/Jenks Consultants and ADS Environmental as part of the City of Oxnard Wastewater Master Plan Update was implemented in the Spring of 2005. Therefore, the Master Plan already accounts for sewer production generated by the existing campus. Because the campus expansion site is proposed to discharge to a different point of connection than existing campus infrastructure, the 11.31-acre southern campus expansion area can be evaluated without additional discussion of existing campus sewer generation rates.

Response to Comment 6-45

The following information has been added to Section 2.2 of the Sewer Preliminary Investigation Report included in Appendix H of the Final EIR:

"To convert the average flow from Table 1 above to peak wet weather flow, the City's standard rainfall depended infiltration/inflow (RDI/I) duty factor of 600 gpad was applied. For the 11.1-acre site, an additional 6,660 gpd shall be considered, resulting in a peak wet weather flow (Qpww) of 11,426 gpd (0.018 cfs)."

Response to Comment 6-46

Section 3.2 of the Sewer Preliminary Investigation Report included in Appendix H of the Final EIR indicates that the proposed sewer generation rates from the campus expansion will not create a measurable impact on downstream infrastructure. The following revisions have been made to Section 3.2 for clarity:

"The increase in sewer flow due to the proposed campus expansion was analyzed to show its downstream *impact on ~~existing infrastructure~~* the City's collection system*. It was assumed that the sewer main ~~is~~* will be *at the maximum acceptable depth/diameter ratio for peak flows ~~in the existing condition~~* when it reaches its projected ultimate demand*. The increase in sewer flow created by the proposed expansion was ~~compared~~* added *to the assumed ~~existing condition~~* ultimate demand *flowrate…"*

Response to Comment 6-47

The District understands that additional coordination with the City's Public Works Department will be required prior to construction of the proposed project.

Response to Comment 6-48

A previous hydrology study is likely non-existent but is unnecessary regardless. The middle school was built in 1961. The Rose Avenue Corridor Specific Plan was prepared in 1986 and the City's Master Plan of Drainage was updated in 2003. Both of these documents considered the existing condition of which the middle school was a part. For this reason, it is safe to assume that none of the existing RDV campus improvements need to be mitigated. Impervious improvements to the existing 20.2-acre campus proposed with this middle school expansion include two new buildings for a total of 16,000 square feet. Additionally, a parking lot and basketball courts are to be relocated from one part of main campus to another. Any increase in imperviousness created with the improvements to the existing main campus will need to be mitigated (detention/infiltration provided) just as proposed on the south campus expansion area improvements. This detailed analysis will be provided during the Final Design process, but the expectation is that given the impervious improvements are so minor compared to the 20.2-acre existing main campus, detention and infiltration can easily be accommodated.

Although no specific detention requirements for this area are available, there is some information provided in the two studies noted above that led to the 1.1 cfs/acre detention guideline. The 1986 Rose Avenue Corridor Specific Plan identifies that the storm drain system is designed for Q10, the Q50 is to be stored in the street, and buildings are to be set above the Q100 water surface elevation. The 2003 City of Oxnard Master Plan of Drainage identifies Q10 to be 0.8-1.2 cfs/ac for residential areas and 1.1 -1.8 cfs/ac for Commercial/Industrial zoning. This falls in line with the 1.1 cfs/ac used in our previous calculations and included with the Draft EIR. Additionally, other projects designed by Jensen in the last 15 years in this same watershed were required by the City of Oxnard to comply with the 1.1 cfs/acre max. There is no available information or studies that identify this proposed project should be treated any differently.

Response to Comment 6-49

Project SQDV was calculated in conformance with Appendix E of the 2011 Ventura County Technical Guidance Manual and the 2018 updated version. Per Equation E-8, the weighted runoff coefficient *C* shall be used in conjunction with the project total impervious area, less the allowable effective impervious area (*TIA – EIAallowable*).

The information shown below from the Technical Guidance Manual identifies how the SQDV is to be calculated using Equation E-8. Equation E-7 is also copied below which shows the C used in equation E-8 is to be weighted.

3) The volume can be calculated using equation E-8 below:

$$SQDV = C*(0.75/12)*A_{retain} \qquad \text{(Equation E-8)}$$

Where:

SQDV	=	the water quality design volume (acre-feet)
C	=	runoff coefficient, calculated by equation (E-7) above
0.75	=	the design rainfall depth (in) [based on sizing method (c)]
A_{retain}	=	the drainage area from which runoff must be retained (acres)

2) Determine the runoff coefficient per the following method:

$C = 0.95*imp + C_p (1-imp)$ (Equation E-7)

Where:

C	=	runoff coefficient
imp	=	impervious fraction of watershed
C_p	=	pervious runoff coefficient, determined using table below

Response to Comment 6-50

The Traffic and Circulation Study (TCS) included in Appendix I of the Final EIR was revised to incorporate the correct Rose Avenue and Collins Street traffic signal jurisdiction.

Response to Comment 6-51

The TCS included in Appendix I of the Final EIR was revised to incorporate the correct the Intersection No. 8 traffic signal designation.

Response to Comment 6-52

Per CEQA requirements, the traffic analysis analyzes existing + project conditions and cumulative + project conditions. A growth factor to 2029 to represent "existing conditions" is not applied as it would not be consistent with CEQA requirements.

Response to Comment 6-53

Review of collision data provided by the City indicates that the collision history does not satisfy *Traffic Signal Warrant 7 – Crash Experience Warrant (2014 CAMUTCD, Rev 6)* of five or more crashes reported in a 12-month period that are susceptible to correction by a traffic signal. In addition, the low side street volumes (76 peak hour trips in the PM peak hour) and delays would not satisfy any other 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. This intersection would operate in the LOS C range with the southbound approach operating in the LOS D range.

Response to Comment 6-54

The proposed project is located in the County of Ventura and the County is the leading jurisdiction. The traffic study parameters were approved by County staff (12/19/2021) and by City staff (Tim Bochum, City Traffic Engineer on 12/15/2021).

Response to Comment 6-55

City and County intersections are analyzed based on each respective traffic study methodology and traffic impact thresholds.

Response to Comment 6-56

The project is located in the County of Ventura and the County is the leading jurisdiction. Annexation by the City is requested but not formalized yet.

Response to Comment 6-57

The project is located in the County of Ventura and the County is the leading jurisdiction. Annexation by the City is requested but not formalized yet.

Response to Comment 6-58

The TCS included in Appendix I of the Final EIR was revised to incorporate the most recent site plan and project description.

Response to Comment 6-59

Project frontage improvements will be coordinated with the County of Ventura since the County is the leading jurisdiction.

Response to Comment 6-60

The school site plan is preliminary in nature. Items such as parking restrictions adjacent to proposed project driveways to accommodate bus turning movements will be incorporated during the design phase.

Response to Comment 6-61

The revised access and circulation plan significantly improves on-site drop-off queuing storage and traffic flow, thus eliminating current queuing issues. Mitigation Measure TRAF-1 (School Traffic Management Plan) would further implement measures to promote travel mode shifts, optimize on-site circulation, and on-site and off-site parking monitoring. No Stopping signs can be installed along Rose Ave (Class II bike lane).

Response to Comment 6-62

The County is the leading jurisdiction and has developed a Safe Routes to School assessment for the school, which includes a pedestrian facility along the west side of Rose Avenue.

Response to Comment 6-63

The bike lane project is included in the County's 2023-2027 Capital Improvement Program, however no finalized construction schedule is available. Annexation by the City is requested but not formalized yet.

3.0 DRAFT EIR CORRECTIONS AND ADDITIONS

3.1 OVERVIEW

This section contains revisions to the Draft EIR. The following corrections and changes are made to the Draft EIR and are incorporated herein as part of the Final EIR. The changes below were made to the Draft EIR in response to comments received and errata discovered after the Draft EIR was circulated. In reviewing and responding to comments on the Draft EIR, the RSD determined that minor revisions to portions of the Draft EIR text were warranted to provide clarification or amplification of certain information. These corrections and clarifications represent additional information or revisions that do not significantly alter the proposed project, change the Draft EIR's significance conclusions, or result in a conclusion that significantly more severe environmental impacts could result from the proposed project. The RSD finds that the changes and modifications made as identified below do not individually or collectively constitute significant new information within the CEQA Guidelines Section15088.5.

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 EIR, the Lead Agency should either revise the text in the body of the EIR 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 EIR and amended text is identified by section number. Amended text to the Draft EIR (Volume II) 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 Corrections and Additions section is included because it provides a means by which the corrections and additions in the Draft EIR are presented in one place.

3.2 CORRECTIONS AND ADDITIONS TO DEIR SECTIONS

3.2.1 Changes to Executive Summary

Executive Summary

- **The following revision was made to the Executive Summary, under Phase I, paragraph one. The revision provides clarification on the annexation process, as follows:**

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

Executive Summary

- **A revision was made to the Summary of Project Alternatives Table on Page E-7. The revision shows that potential impacts are reduced through implementation of mitigation measures for the Hazards and Hazardous Materials Issue Area.**

Summary of Project Alternatives

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

- **The following text was added to the Executive Summary to provide clarification on the selection of alternatives process in response to comment letters 5 and 6:**

RSD also studied several potential middle school sites and other alternatives and determined the proposed project Site to be the one that is best available, and the only one that would accommodate all of the improvements to the RDV campus as well as the transportation and parking components. These alternative sites included the following:

- *Existing nine RSD campuses including RDV;*
- *Beedy Street (property located near intersection of Beedy Street and E. Vineyard Avenue in Oxnard, CA);*
- *Santa Clara Parish Chapel Vacant Land (1333 Ventura Boulevard Oxnard, CA 93036);*
- *RSD-owned property adjacent to fire station cul-de-sac (property located near 3300 Turnout Park Circle Oxnard, CA 93036 (Oxnard Fire Department Station 7)); and*
- *City Old and New Transportation Yard (property located near 201 E. Fourth Street Oxnard, CA 93030); and.*
- *Miscellaneous properties listed for sale in Oxnard and Ventura County.*

One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost effective and District-wide individual

school attendance boundary adjustments will be made as needed in the future. These alternative sites would not meet two of the Project Objectives of providing new facilities that meet the RSD's educational specifications and building school facilities that reflect the wise and efficient use of limited land resources. Therefore, alternative site locations were considered but rejected by RSD.

RSD studied two alternative sites for the proposed bus transportation facility. The first site is a 1-acre parcel owned by RSD (property located near 3300 Turnout Park Circle Oxnard, CA 93036 (Oxnard Fire Department Station 7)) and leased to the City of Oxnard (50-year lease) for storage of maintenance equipment. This site was eliminated because RSD could not reach an agreement with the City for required site improvements to park the school buses at this site. The other site was a bus parking facility located at the Oxnard School District Transportation Center (near 516 W. Wooley Road). This site was eliminated because RSD could only negotiate a 1-year lease agreement with Oxnard School District so this site would just be a temporary bus parking facility.

- **The following revisions were made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.1 in the Executive Summary. Changes were made in response to comment letters 5 and 6, to provide additional clarification of the proposed project's land use designations in relation to Aesthetics.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.1 Aesthetics			
Would the project, in non-urbanized areas substantially degrade the existing visual character or quality of public views of the Site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	**Less than Significant Impact.** The existing main campus has a Ventura County General Plan land use *designation of Very Low Density Residential, a El Rio/Del Norte Area Plan land use designation of Institutional with a 10-acre minimum lot size, and* a zoning designation of RE-20,000 SF. *The* northern campus expansion area and *the* southern *campus* expansion area have a Ventura County General Plan land use *designation of Agricultural, a El Rio/Del Norte Area Plan land use designation of Agricultural with a 40-acre minimum lot size, and* a zoning designation of AE-40 ac/MRP. Schools are prohibited within the County's AE-40 zone. However, the proposed project includes annexation into the City of Oxnard, thereby the County's land use and zoning designations would no longer be applicable to the project Site. The existing main campus is also within the City of Oxnard's SOI with a City of Oxnard General Plan land use designation of School. The northern campus *expansion* area and southern *campus* expansion area are not within the City of Oxnard's SOI and have a City of Oxnard General Plan land use designation of Agriculture.	No mitigation is required.	Less than Significant Impact

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	construction equipment, materials, and workers, at the project Site. Vehicles such as automobiles, pickup trucks, and dump trucks would be visible. Heavy equipment such as backhoes, graders, and excavators and workers would be visible during Site clearing, grading, construction, and Site cleanup. Construction equipment and activities would be seen by various viewers in proximity to the project Site, including travelers on Rose Avenue and Collins Street. Other viewers in the area include residents in the homes surrounding the project Site; however, these views are often obstructed by the existing walls and vegetation found on the west side of Rose Avenue. Construction activities would be temporary and short-term and thus would have minimal effect on aesthetics and visual quality, resulting in a less than significant impact. As previously stated, the northern campus expansion area will continue to be used for agriculture with a small outdoor lecture area added to the southeast corner of the northern campus expansion area parcel. Therefore, the visual character of the northern campus expansion area will remain consistent with existing conditions and no impact will occur. New school and community recreational facilities under Civic Center Act or by Joint Use Agreement, will be added to the main campus. While configuration of these facilities will change in comparison to existing conditions, they will be consistent with the existing school character (see Figure 2-3). Development of the southern campus expansion area would change the visual character of the southern campus expansion area by introducing newly designed school uses (recreational facilities, new buildings, and parking) to the area in comparison to existing conditions (a residence, vehicle and farm equipment, and agriculture) as shown in Figure 3-5 through Figure 3-8. The buildings would be one- to two-stories in height, in keeping with the characteristics of the existing school buildings. The project will be bordered by		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	landscaping. The incorporation of landscaping would result in these features being the most visible elements along public street frontages. The visual characteristics of the southern campus expansion area would be consistent with the main campus and the developed areas surrounding the project Site. The eastern half of the southern campus expansion area will be composed of playfields as will the main campus. The playfields, in addition to the agricultural uses on the northern campus expansion area, will provide a visual segue way between the developed and agricultural environment located to the east and north of the project Site. The visual characteristics of the proposed project would be consistent with the developed areas immediately to the west and south. Therefore, project impacts to visual character and quality would be less than significant.		

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.2 in the Executive Summary to provide additional clarification of the proposed project's impacts to Agriculture and Forestry Resources and additional Mitigation Measure in response to Comment Letters 5 and 6.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.2 Agriculture and Forestry Resources			
Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and	**Significant Unavoidable Impact.** The CDC FMMP identifies the 9 acres (or 90%) of the approximately 10-acre northern campus expansion area as Prime Farmland and 0.9 acres (or 9%) as Farmland of Statewide Importance (CDC 2022b). As described in Section 2.4, Project Description, no land use changes to the northern campus expansion area are currently proposed as part of the proposed project. Approximately 10 acres on the northern campus expansion area of the project Site is currently utilized for agriculture	**AG-1:** The District shall offer at cost the top 12 inches of the Prime Farmland and Farmland of Statewide importance soils from the southern campus expansion area for relocation to a farm site or farm sites that have lower quality soils. The cost will include suitable replacement soil, if	Significant Unavoidable Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
Monitoring Program of the California Resources Agency, to non-agricultural use?	and RSD plans to utilize the Site as an outdoor working farm "classroom." No utility expansion is proposed in this area. An outdoor lecture area and a small, paved pathway are planned for this area. Possible fencing may be added for security. A Notice of Exemption (NOE) for the purchase and use of the northern campus expansion area for an agricultural learning program was filed and posted with the Ventura County Clerk on August 11, 2021; no challenges to the NOE were filed. As the proposed project would not convert the northern campus expansion area to a non-agricultural use, no significant impacts would occur. *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 approximately 20.2-acre main campus is a developed middle school campus and is identified by the CDC FMMP as Urban and Built Up Land. As the improvements to the main school campus would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, no significant impacts would occur. The proposed project plans to develop the southern campus expansion area with school uses including classrooms, recreational facilities, and parking facilities. The CDC FMMP identifies the 8.2 acres (or 74%) of the approximately 11.1-acre southern campus expansion area as Prime Farmland and 2.9 acres (or 26%) as Farmland of Statewide Importance (CDC 2022b). As previously described, the approximately 11.1-acre southern campus expansion area currently	needed for Site improvements. **AG-2:** *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.*	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	contains approximately 0.3-acre of residential use, 0.25-acre tenant storage yard, 0.45-acre junk vehicle storage area, 1.1-acre farm equipment storage and parking area, and a 0.3-acre farmyard. The remaining 8.7 acres of the southern campus expansion area is used for cultivation organic raspberry production. Approximately 0.3 acres of the southern campus expansion area has been developed with the residence for over 28 years (Tetra Tech 2021a). It is considered unlikely that this acreage would be redeveloped to active agricultural production and therefore, these 0.3 acres are not considered farmland. An additional 2.1 acres are either being used for non- agricultural production activities or agricultural support activities for over 3 years. While these acres are not under active agricultural production, these uses could more easily be removed, and the acres returned to active agricultural production. For a more conservative analysis, these additional 2.1 acres plus the 8.7 acres under active agricultural production are considered farmland for the LESA model and the impact analysis. Therefore, this analysis considers the impacts associated with the proposed project's conversion of approximately 7.9 acres of Prime Farmland and 2.9 acres Farmland of Statewide Importance. A LESA was prepared for the non-residential portion of the southern campus expansion area that considered the six factors of the LESA Model: two Land Evaluation factors comprised of LCC and Storied Index ratings; and four Site Assessment factors comprised of the area's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. Soils within the non-residential portion of the southern campus expansion area were identified using a custom Soil Resource Report (USDA NRCS 2022). The LCC and		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	Storie Index scores generated using the LESA model are shown in Table 3-5. The Size score is based on the amount of acreage of each soil class type. For an area with approximately 9.8 acres of Class 2 soils and approximately 1 acre of Class 3 soils, the score is 0 points. The Water Resource Availability score is based on the type of irrigation present on the project site and upon the feasibility of irrigation in drought and non-drought years, and whether physical or economic restrictions are likely to exist. As irrigation has been historically conducted at the southern campus expansion area, the Water Resource Availability score is 80 and the weighted factor score is 12. The Surrounding Agricultural Land Use score is based on the percentage of land in agricultural use in the area's Zone of Influence (ZOI). The ZOI is the surrounding land within one quarter mile of the area. Approximately 21% of the land in the area's ZOI is in agricultural use. When the percentage within the ZOI is under 40%, the corresponding Surrounding Agricultural Land score is 0. No lands in the area's ZOI are under a Williamson Act contract; therefore, the Protected Resource Lands score is 0. As shown in Table 3-6, a final LESA score ranging from 40–59 points is considered significant only if both the Land Evaluation and Site Assessment weighted factor subscores are each greater than or equal to 20 points. (CDC 1997). The final LESA score for the proposed project is 52 and the Site Assessment subscore is less than 20 points as shown in Table 3-6. Under the CDC LESA methodology, the proposed project will not have a significant impact on agricultural land use on the project Site or ZOI. While the proposed project was found to not have a significant impact on agricultural land		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	use under the CDC LESA methodology, the proposed project would involve the conversion of greater than 5 acres of Prime/Statewide Important Farmland. Under the County of Ventura ISAG criteria, the proposed project would result in a significant impact due to the conversion of important farmland to non-farmland uses. The City has determined that conversion of agricultural land is a project-level impact and requires a mitigation measure to offer the topsoil for removal to another farm operation, if feasible, as a partial mitigation for the loss of prime farmland impact (City of Oxnard 2012). The City has policies that encourage establishment of a farmland protection program and use of conservation easements and land banking to protect continued agricultural uses throughout the City's SOI and policies and programs that support existing agricultural buffers (such as the SOAR Ordinance) in order to reduce or slow further loss of agricultural resources, however, these policies do not offset an actual loss of farmland acreage. No additional feasible mitigation measures are currently available to reduce this impact to a less than significant level, therefore this impact would remain significant and unavoidable (City of Oxnard 2009). *As discussed above, impacts were identified associated with the proposed project's conversion of approximately the southern campus expansion area. However, of these 10.8 acres, only 8.7 acres are actively used for agricultural production. The proposed project would not convert the approximately 10 acres on the northern campus expansion area of the project Site to a non-agricultural use and the District will commit to retaining the agricultural use of the northern campus expansion area for a minimum of 10 years, see Mitigation Measure AG-2. Therefore, Mitigation Measures AG-1* and AG-2 are		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	provided to mitigate for the loss of important farmland. Nonetheless, conversion of agricultural land would remain a significant and unavoidable impact.		
Would the project conflict with existing zoning for agricultural use?	**Less than Significant Impact.** The existing campus has a Ventura County General Plan land use *designation of Very Low Density Residential, a El Rio/Del Norte Area Plan land use designation of Institutional with a 10-acre minimum lot size, and* a zoning designation of RE-20,000 SF. *The* northern campus *expansion area* and the southern campus expansion area have a Ventura County General Plan land use *designation of Agricultural, a El Rio/Del Norte Area Plan land use designation of Agricultural with a 40-acre minimum lot size,* and a zoning designation of AE-40 ac/MRP. Schools are prohibited within the County's AE-40 zone. However, because the proposed project includes annexation into the City of Oxnard, the County's land use and zoning designations would no longer be applicable to the project Site. The existing campus is also within the City of Oxnard's SOI with a City of Oxnard General Plan land use designation of School. The northern campus *expansion area* and southern campus expansion area are not within the City of Oxnard's SOI and have a City of Oxnard General Plan land use designation of Agriculture. The proposed project includes annexation into the City of Oxnard. The proposed project would require annexation into the City of Oxnard, with associated SOI and CURB growth boundary amendments, all of which would require LAFCo approval. The District will process a GPA, RZ, and an Annexation through the City of Oxnard. The proposed project will be required to be reviewed and recommended for approval to the City Council by the Planning Commission at a noticed public hearing prior to the City	No mitigation is required.	Less than Significant Impact

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	allowed if the requested CURB amendment is approved. If the required discretionary approvals are granted, the proposed project ~~w~~ *could* be exempted from the SOAR ordinance *by the City of Oxnard* and the impact would be less than significant.		

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.3 Air Quality, in response to comment letter 2. Revisions and additions provide additional clarification of the proposed project's potential impacts to Air Quality based on updated equipment.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.3 Air Quality			
Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment area under an applicable federal or state ambient air quality standard?	**Potentially Significant Impact During Construction.** Per CEQA, a project is cumulatively considerable if the incremental effects of the project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. CEQA also prescribes that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan (e.g., air quality attainment or maintenance plan) or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located (California Office of Administrative Law 2022). The applicable attainment plan in Ventura County is the 2016 AQMP. While the proposed project would not result in a population increase and its emissions would not be beyond what is projected in the AQMP, the	**AQ-1:** In accordance with standard practice pursuant to the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations during project construction the contractor shall ensure that: • All soil excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed soil areas. Watering shall be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations. • All clearing, earth moving, and excavation activities shall cease during periods of winds	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	proposed project requires a land use redesignation from agriculture to school land use. The redesignation would accommodate anticipated growth forecasted for the City of Oxnard. To determine the extent to which a project will impact air quality in Ventura County, the VCAPCD has established emission significance thresholds. Since these thresholds are linked to the AQMP, an exceedance could render a proposed project as noncompliant with the AQMP and therefore as having a cumulatively considerable net increase. Since the proposed project would contribute emissions to the regional air during its construction and operation, the significance thresholds established by the VCAPCD were used to determine whether the proposed project would result in significant impacts. **Short-term Emissions.** Short-term or construction emissions are typically generated by on-road (e.g., employee vehicles and vendor/delivery and water trucks) and off-road vehicles or equipment (e.g., backhoes, dozers, portable generators, and graders). Short-term emissions end once the construction phase is complete. The proposed project's construction phase consists of site preparation; grading; construction (e.g., classrooms, administrative offices; and supporting structures, soccer, football, and softball fields, and tracks), paving; and application of architectural coatings to classrooms and offices. Emissions from the construction phase result primarily from mobile on-road (e.g., workers vehicles, material, and equipment delivery trucks) and off-road sources (i.e., construction equipment). The construction equipment used for the proposed project would include air compressors, scrapers, excavators,	greater than 20 miles per hour (mph) (averaged over one hour), if disturbed material is easily windblown, or when dust plumes of 20% or greater opacity impact public roads, occupied structures, or neighboring property. • All fine material transported off-Site shall be either sufficiently watered or securely covered to prevent excessive dust. • All haul trucks shall be required to exit the Site via an access point where a gravel pad or grizzly has been installed. • Stockpiles of soil or other fine loose material shall be stabilized by watering or other appropriate method to prevent wind-blown fugitive dust. • Once initial leveling has ceased, all inactive soil areas within the construction Site shall either be seeded and watered until plant growth is evident, treated with a dust palliative, or watered twice daily until soil has sufficiently crusted to prevent fugitive dust emission. • On-Site vehicle speed should be limited to 15 mph.	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	forklifts, generator sets, pavers, rollers, rubber-tired dozers, backhoes, graders, paving equipment and welders. CalEEMod was used to calculate emissions from construction and operation of the proposed project. Emissions, including detailed data entered into CalEEMod to calculate emissions are included as Appendix B. A summary of construction emissions is presented in Table 3-11. VCAPCD does not have significance thresholds for construction emissions due to the fact that construction emissions occur only on a temporary basis and do not contribute to long-term air quality impacts. Thus, emissions resulting from the proposed project would not be expected to have a significant impact on the environment and no mitigation measures would be required other than what is standard and recommended. To this effect, Mitigation Measure AQ-1 provided at the end of this Air Quality Section is provided to minimize fugitive dust emissions in compliance with the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations and to minimize VOCs and NO_x in accordance with VCAPCD recommendations for construction emissions exceeding 25 pounds per day for VOCs and NO_x. **Long-term Emissions**. Long-term or operational emissions are emissions that result from activities conducted during the operation of a project (e.g., comfort heating, employee commute, student drop-off and pickup, and facility upkeep). Long-term impacts to air quality would be associated with emissions from equipment used during operation of the proposed project (e.g., commercial water heaters, space heaters, and lawn mowers) and from motor vehicles	• All areas with vehicle traffic should be paved, treated with dust palliatives or watered a minimum of twice daily. • Properly maintain and tune all internal combustion engine powered equipment; Require employees and subcontractors to comply with the CARB idling restrictions for compression ignition engines; and use California ultra-low sulfur diesel fuel; use construction equipment with Tier ~~2~~4 engines; and use interior and exterior paint with a VOC content of ~~100~~50 grams per liter.	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	associated with school employees, student drop-off and pick-up, and vendors. Other activities that would contribute emissions during the operation of the proposed project include upkeep of structures (e.g., reapplication of architectural coatings and patching of paved surfaces). Detailed CalEEMod input parameters, used for calculating emissions, and emissions results are provided in Appendix B. Emissions resulting from operation of the proposed project are summarized in Table 3-12. Emissions resulting from the operation of the proposed project are below the thresholds of significance established by VCAPCD to support attainment of federal standards. Therefore, the proposed project would not be expected to violate any air quality standard or contribute substantially to an existing or projected air quality violation and would have less than significant impact on air quality. As identified in Table 3-12, the proposed project would not violate an air quality standard, nor would it contribute substantially to an existing or projected air quality violation. Therefore, project impact would be less than significant. Since the proposed project's long-term emissions are less than established thresholds of significance, and its land use is not anticipated to provide for increase population growth above what is forecasted in the Oxnard and Ventura County General Plans, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment. Therefore, the proposed project would have less than significant cumulative impacts.		

- **The following revisions and additions were made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.5 Cultural Resources in the Executive Summary, in response to comment letters 5 and 6. Revisions provide additional clarification of the proposed project's approach to Cultural Resources Impacts, and to add a mitigation measure.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.5 Cultural Resources			
Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	**Potentially Significant Impact during Construction.** The records search and NAHC sacred lands search did not identify any known historical resources within or adjacent to the project Site. The historic map and aerial review and Phase I archaeological survey did identify two historic era-built environment resources: the RVD buildings and infrastructure and a residential building constructed between 1947 and 1967. These resources are unrecorded and have not been evaluated for significance eligibility as historical resources under CEQA. Project design indicates a modification to the existing RVD and residential building at 2600 N Rose Avenue, Oxnard, California. It is recommended that a qualified architectural historian assess whether the project will have a potential significant impact to these historic era resources. *After the assessment and prior to final design and construction, appropriate measures will be incorporated that would protect any identified historical resource from potential significant adverse changes, in compliance with CEQA Sections 15126.4(a)(l)(B) and 15126.4(b). Incorporation of Mitigation Measure CUL-1 and CUL-4* would reduce the potential impact on historical resources to less than significant.	**CUL-1: Built Environment.** Prior to construction of the proposed project, the project owner shall retain a Secretary of Interior qualified architectural historian to assess whether the proposed project will have a potential significant impact to the historic era RDV buildings and infrastructure, and the existing residential building at 2600 Rose Avenue, Oxnard, California. ***CUL-4: Historic Resources Protection.*** *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*	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
		permit conditions, agreements, or other measures as per Cal. Code Regs. tit. 14 § 15064.5	

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.6 Energy, in response to comment letters 5 and 6. Revisions provide additional clarification of the proposed project's Energy Impact.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.6 Energy			
Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	**Less than Significant Impact.** The proposed project is intended to provide educational services needed for existing and future students in the neighboring area. The proposed project is adjacent to agricultural land to the north and a fully developed residential development to the west, housing development and an elementary school to the east, and housing and commercial developments to the south. The proposed project is designed to comply with California requirements for energy conservation standards codified in CCR Title 24, Part 6. This means the following steps will be taken: • Buildings will comply with energy efficiency standards; • All new appliances will adhere to energy and water efficiency standards; and • Photovoltaic energy generation panels will be incorporated into the project design. In addition, the City of Oxnard's General Plan and EAP requirements will be followed, as described in Table 3-14.	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	The middle school expansion will continue to serve a stable student population, and the expanded middle school is designed to accommodate up to an additional 250 students, a potential increase of approximately 30% over the current population. **Short-Term Energy Use** The construction phase is temporary, and it ends once the proposed project is built and construction activities are completed. During the construction phase energy consumption will result primarily from fuel used to power off-road construction equipment, trucks delivering and removing various materials, and vehicles used by employees to travel to the job Site. In addition, fuel use by the bus fleet serving the District's student transportation needs will continue while operating out of the temporary facility at 516 W. Wooley Road. Construction equipment and trucks would be subject to applicable regulations which include anti-idling measures and use of efficient engines. These measures would prevent the unnecessary use of energy by inefficient equipment. Buses are already in use by the RSD under current conditions. A slight increase in fuel use may result from the use of the temporary facility to park and maintain buses. However, this will be a small amount compared to that needed to continue the bus routes, and since this service is necessary, the temporary increase is not considered wasteful or inefficient. Therefore, no aspects during construction of the proposed project have been identified to result in any unnecessary use of energy. Thus, the		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	construction of the proposed project is not anticipated to result in wasteful, inefficient, or unnecessary use of energy. **Long-Term Energy Use** The proposed project will require energy to conduct daily operations. Energy consumption at the project Site will result from the use of electricity and natural gas to power various assets including appliances, equipment, light fixtures, landscape controls and equipment. Energy consumption will also result from vehicles such as delivery trucks, school buses, and personal vehicles used by school staff or by parents to drop off and pick up students. The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when the classroom is unoccupied. The electrical systems will include energy-efficient light-emitting diode (LED) lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The proposed Site parking lot and pathway pole-mounted lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the proposed project will be an energy-efficient type complying with the most recent energy code. Energy use by the proposed project was calculated using CalEEMod and would occur at a rate of 3.33 giga British		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	Thermal Units per year for natural gas use and 1.45 gigawatt-hours per year for electricity use. By implementing CEC-compliant design features into the expanded middle school facilities and following City of Oxnard goals and objectives in executing the proposed project, energy use per student is expected to decrease. Actual vehicle fuel use comparisons for the current facilities, including the RDV Middle School and the District Transportation and Parking Facility, are not possible, as data for such calculations are not available. Instead, this evaluation considers current and projected transportation modes to infer potential energy use changes. Under current conditions the RDV student population arrives at school on a bus or via a self-transport mode (as a pedestrian, on a bicycle, or dropped off from a vehicle). The same will be true after the proposed project is completed and the expanded middle school facilities commence operations. There is no reason to project that the percentage of each mode will change after the proposed project is completed, so this evaluation of potential impacts to energy (fuel) use considers the likely change in efficiency of each mode. Furthermore, walking or riding a bike to school does not use fuel, so neither is a concern of this evaluation. Therefore, only vehicle transport (self-transport mode) and District-provided transport (bus mode) of students are considered. The new DTPF that will be co-located with the expanded middle school facility, will create a separate entrance for bus traffic, both to access the parking/maintenance area and to drop off or pick up students (Stantec 2022b).		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	This will improve the efficiency of the drop-off and pick-up processes for both bus traffic and vehicle traffic. Improved efficiency in these processes translates directly into a smaller amount of fuel used per student per day under proposed conditions. In addition, because the new bus facility will be co-located with RDV Middle School, efficiency in the total length of bus trips *will be* realized for the six *daily morning and six daily afternoon* bus trips for ~~the~~ students of RDV Middle School *because of a 1.5 mile per trip reduction in the distance traveled.* The remaining ~~24~~ 18 bus trips serving the rest of the RSD *will* ~~should~~ *save a combined, net, three miles per day* ~~least not increase~~ due to the ~~new~~ *proposed co-location of the new bus* ~~facility location and may in fact decrease because the new facility is more centrally located within the RSD.~~ Therefore, the projected energy use per student, is expected to decrease with the expanded middle school facility. No aspects of the proposed facility operations of the completed project have been identified to result in unnecessary use of energy. Therefore, none of the projected facility operations are expected to cause wasteful, inefficient, or unnecessary consumption of energy resources and project impacts would be less than significant.		

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.8 Greenhouse Gas Emissions in response to comment letters 5 and 6. The revision provides additional clarification of the proposed project's Greenhouse Gas Emissions Impact.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.8 Greenhouse Gas Emissions			
Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	**Less than Significant Impact**. The proposed project would generate GHGs during construction and operation activities. Detailed GHG calculation input data and results are presented in Appendix ~~BC~~. A summary of GHG emissions from construction and operation activities of the proposed project including, significance with respect to the SCAQMD threshold of 10,000 MT per year of CO_2e is presented in Table 3-16. As identified in Table 3-6, GHG emissions generated by the proposed project would not exceed the identified threshold and therefore project impacts are considered less than significant.	No mitigation is required.	Less than Significant Impact

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.9 Hazards and Hazardous Materials in response to comment letter 6. The revisions provide additional clarification of City of Oxnard significance thresholds and add a mitigation measure related to the project's potential impacts to Hazards and Hazardous Materials.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.9 Hazards and Hazardous Materials			
Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	**Potentially Significant Impact**. As stated in Section 3.9.1.1, additional step out sampling should be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should also be performed at sample location SS-35.	**HAZ-2:** Additional step out sampling should be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should be performed at sample location	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	Once the extent of OCPs at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of the RDV Expansion Project. The OCP and TPH housekeeping soil removal action will be considered complete following DTSC granting a No Further Action status to the project Site. With the implementation of Mitigation Measure HAZ-2, the proposed project would have a less than significant impact. *Tetra Tech determined that no further action is recommended for the 10-acre northern campus expansion area for as long as the northern campus expansion area is used for agricultural production. 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. With the implementation of Mitigation Measure HAZ-3, the proposed project would have a less than significant impact.*	SS-35. Once the extent of OCPs at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of the RDV Expansion Project. The OCP and TPH housekeeping soil removal action will be considered complete following DTSC granting a No Further Action status to the project Site. ***HAZ-3:*** *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.*	

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.10 Hydrology and Water Quality, in response to comment letters 4, 5 and 6. Revisions provide additional clarification of the proposed project's potential impacts to Hydrology and Water Quality.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.10 Hydrology and Water Quality			
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	**Potentially Significant Impact.** During construction, it is not anticipated that the groundwater table would be encountered during excavation. However, perched groundwater may be encountered in localized areas during excavation and may require dewatering. Any groundwater dewatering performed during excavation would be temporary, not result in a substantial volume removed, and completed in accordance with the Los Angeles RWQCB's Groundwater Discharge Permit. Grading and construction activities would compact soil, and construction of structures would increase impervious area, which can decrease infiltration during construction. However, construction activities would be temporary, and the reduction in infiltration would not be substantial relative to the Oxnard Forebay Groundwater Basin. Conversely, the proposed post-construction infiltration/ detention basin may contribute to groundwater recharge in the Oxnard Forebay, which is highly desirable. Therefore, construction of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Construction impacts related to groundwater supplies would be less than significant and no mitigation is required. ***Potable Water Sources*** The proposed project will increase the school's water demands. The new 10-acre northern campus expansion area will require irrigation water for crops. Using the FCGMA Crop Year Irrigation Allowance Table, and assuming the crops are avocados with 20-70% ground	**HYDRO-2:** The project shall meet its City of Oxnard Water Neutrality Policy requirements by completing at least one of the following: • Transfer of existing Fox Canyon Groundwater Management Agency (FCGMA) groundwater allocations to the City; • Contributing to increased efficiency by funding City water conservation programs; • Funding recycled water retrofit projects; or • Providing additional water supplies.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	shading, typical precipitation, the farm will require 2.0 acre-feet/acre. Given the farm is 10 acres, this results in 20 acre-feet per year (AFY) demand for the northern campus expansion area. The southern campus expansion area will increase the number of classrooms and add ~~a bus wash~~ parking spaces for existing District buses. Additionally, the proposed project plans to replace all existing and new sports fields with "xeriscape" (i.e., landscape requiring very little to no irrigation), resulting in a net decrease in landscaping water demand. Jensen calculated the ratio between the existing and proposed areas to determine the projected water demand. They found RSD will have a net surplus of ~~*17.701*~~*10.729* AFY of water allocations with the proposed project (Jensen 2022b). Additionally, the City requires selected new development projects to design and construct dual piping systems within their project areas to facilitate the delivery of recycled water for non-potable uses, such as irrigation of landscaping and athletic fields. Infiltration of water used for irrigation or other outdoor uses and stored in the infiltration basin would contribute to recharge of the underlying basin. A portion of the proposed project's wastewater will be treated at the publicly owned treatment works (POTW), treated at the Advanced Water Purification Facility (AWPF), and injected into the groundwater basin. Therefore, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operational impacts related to groundwater supplies would be less than significant and no mitigation is required.		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	Neutrality The City developed a credit bank for use during extended drought or water supply restricted conditions and will gradually restore its groundwater credit bank as a buffer against future supply constraints with the GREAT Program (City of Oxnard 2012). It is anticipated that reasonably-projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection are sufficient to meet the water demand associated with the proposed project, in addition to the City's existing and planned future uses (City of Oxnard 2012). Furthermore, the City imposes a variety of development impact fees based on land use, size, and service impact area. Specifically, the City Water Neutrality Policy requires all new development approved within the City to offset the water demand associated with the project with a supplemental water supply. Under the policy, two of the options in which a development can be water neutral include funding City water conservation programs and/or recycled water retrofit projects. The requirements of the City Water Neutrality Policy are included in the proposed project's water allocation analysis (Jensen 2022b). The City is requiring the proposed project to present a plan for water neutrality. Therefore, with the implementation of Mitigation Measure HYDRO-2, the proposed project's impacts on groundwater supply would be less than significant.		

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.11 Land Use and Planning in response to comment letters 5 and 6. The revisions provide additional clarification of the proposed project's land use designations and potential impacts to Land Use and Planning.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.11 Land Use and Planning			
Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	**Less than Significant Impact.** **LAFCo Actions** The proposed project would require annexation into the City of Oxnard, with associated SOI and CURB growth boundary amendments, all of which would require LAFCo approval. The proposed changes of organization are collectively called "reorganization." The following LAFCo actions would be necessary components of the reorganization. • Annexation of all three proposed project parcels to the City of Oxnard. • Annexation of all three proposed project parcels to CMWD. • Amendment of the City of Oxnard's SOI to include the northern and southern campus expansion areas. • Amendment of the City of Oxnard CURB to include the northern and southern campus expansion areas. The District will process a GPA, RZ, and a Reorganization and SOI amendments through the City of Oxnard. The proposed project will be required to be reviewed and recommended for approval to the City Council by the Planning Commission at a noticed public hearing prior to the City Council's public hearing process and final action. If the project is approved by the City Council, the City will file a Resolution of Annexation with LAFCo. Upon approval of the reorganization and SOI amendments by LAFCo, and a 30-day reconsideration period, the reorganization will be recorded, and the project Site will be annexed into the City of Oxnard and the CMWD and eligible for all public services. Discussion of project consistency with relevant LAFCo Policies is provided in Tables 3-18 through 3-20.	No mitigation is required.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	As identified in Tables 3-18, 3-19, and 3-20, the proposed project is generally consistent with LAFCo policies and project land use impact would be considered less than significant. Discussion of project consistency with relevant City of Oxnard 2030 General Plan and El Rio/Del Norte Area Plan polices is provided in Table 3-21. Consistent with Ventura LAFCo Commissioner's Handbook Section 3.2.4.1 (as provided in Table 3-18), this discussion is limited to the northern and southern campus expansion areas and does not include the existing main campus. The existing main campus of the project Site has been developed with a middle school campus for 61 years and has not had compatibility issues with the adjacent agricultural uses. Expansion of the existing RDV campus as proposed has been determined as the best option for increased middle school education service within the RSD attendance boundary. RSD has two existing middle schools: RDV and Rio Vista. There is no adjacent land available to expand the Rio Vista campus. RDV was selected because adjacent land was available to purchase by RSD for the campus expansion. Additionally, six of the District's 17 buses are used for RDV student transportation, and RDV has an urgent need for bus parking facilities and improvements to student drop-off and pick-up accessibility and safety conditions on Site. The expanded campus, accessed from Rose Avenue and Collins Street, will inherently create the necessary parking facilities and improve campus vehicle safety. One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost-effective option. As discussed in Section 3.2 of this EIR, implementation of the proposed project would result in the conversion of agricultural land into educational uses, resulting in a significant, unavoidable, and permanent loss of 8.2 acres of Prime Farmland and 2.9 acres of Farmland of Statewide Importance. No feasible mitigation measures were available to reduce the impact to a less than significant level. However, Mitigation Measure AG-1 is proposed to reduce the potential impact, and the proposed design would provide a buffer of 300 feet or greater between the middle school buildings and the off-Site agricultural uses to the north and east. Additionally, the proposed recreation fields would also provide a buffer between the proposed transportation hub and the agricultural field to the east. Through Policy AG-1.3, the County expresses its commitment to restrict development to uses consistent with existing agricultural or open space zoning (County of Ventura 2020a). As discussed in Section 3.2 of this EIR, the project will not have a significant adverse effect on the physical and economic integrity of other prime agricultural or existing open space lands outside of the project area. The northern and southern campus expansion areas are located within the greenbelt established by the 1984 “Joint Resolution of the City Councils of the City of Camarillo and the City of Oxnard and the County of Ventura Establishing a Greenbelt Between North and South of the Two Cities.” As part of the proposed project, the RSD is requesting that this agreement be amended. Specifically, the map is to be amended to exclude the proposed northern and southern campus expansion areas. If the requested		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	amendment is approved by all parties (City of Camarillo, City of Oxnard, County of Ventura), then the proposed project would be consistent with this policy. As shown in Table 3-16, the County's approval of the proposed project is limited to amending the existing Camarillo-Oxnard Greenbelt Agreement. Any conditions imposed on the proposed project will be from other agencies with discretionary approval (e.g., City of Oxnard). Additionally, Table ED-3 of the El Rio/Del Norte Plan limits the maximum building lot coverage to 60% of total lot area within the Institutional zone (which the northern and southern campus expansion areas will effectively become, if the proposed project is approved); the proposed building coverage on the northern campus expansion area and southern campus expansion area would be approximately 0% and 25%, respectively. Although a copy of the NOP was not provided directly to the El Rio/Del Norte Municipal Advisory Council, they will be included in the distribution list for this EIR. As described in more detail in Section 3.18, *Utilities and Service Systems*, the RSD in general, and the RDV school in particular, are currently in compliance with all federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed project expansion would require continued conformance with these statutes and regulations, including continued participation of the RDV school in existing City recycling programs. Modification of the existing Waste Management Plan will also be required to include the proposed facilities. All new construction will also be required to achieve the 65% diversion requirement per CALGreen standards. The revised plan must be prepared and submitted to the City of Oxnard Environmental Resources Division prior to the issuance of a building permit. Additionally, AB 939 mandates a minimum		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	67% diversion rate during operations. As such, the proposed project will employ measures to reduce solid wastes generated and will have a recycling program. The proposed recreational facilities (a 320-meter track, a flag football field, six basketball courts, a baseball field, a softball field, P.E. and lunch play field, four sand volleyball courts, two soccer fields, a jogging path, and athletic restroom/storage building, and up to 10 tennis courts and/or pickleball courts) will be available to the public outside of school hours and will likely lessen the physical impacts/demand on nearby park and recreational facilities. The increase in runoff volume and rate caused by the proposed project's new impervious surfaces would be mitigated by the project's proposed post-construction features, which are required by the Construction General Permit and the City's MS4 Permit, will follow the TGM (County of Ventura 2011, updated 2015 and 2018), will be defined in the PCSMP, and vetted by the City of Oxnard. The design to the storm water drainage features will be required to comply with the City's 1 cfs/ac flow rate to prevent downstream flooding of the receiving waters and compliance with this design requirement will, thus, not contribute runoff that would exceed the capacity of existing stormwater drainage systems. Therefore, the project's storm water drainage impacts would be less than significant. As discussed in Section 3.10.2, Hydrology and Water Quality Impact Analysis, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operation impacts related to groundwater supplies would be less than significant, and no mitigation is required. The proposed project is generally consistent with relevant Ventura County General Plan polices and project land use		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	impact would be considered less than significant. **City of Oxnard 2030 General Plan and Zoning** The project Site is currently located within unincorporated Ventura County and the zoning designation is RE-20,000 S.F. (Existing Campus) and AE-40 ac/MRP (Northern and Southern Campus Expansion Areas). Schools are prohibited within the County's AE-40 zone. However, the proposed project includes annexation into the City of Oxnard thereby the County's land use designations would no longer be applicable to the project Site. The RSD would process a GPA, RZ, and a Reorganization and SOI amendments through the City of Oxnard. The proposed General Plan land use designation is ~~*School*~~ *Public/Semi-Public*, and the proposed zoning designation is Community Reserve (C-R). Schools are an allowed use within the C-R zone with approval of the special use permit (Oxnard Municipal Code Section 16-257). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with the General Plan and zoning land use designations. The existing main campus is located within an area that is planned for continued use as a middle school, and the northern and southern campus expansion areas are within the Oxnard-Camarillo Greenbelt. Notwithstanding a General Plan or Zoning Amendment, School Districts are not required to comply with the local building ordinances, except for city and or county ordinances for (1) regulating drainage improvements and conditions; (2) regulating road improvements and conditions; and (3) requiring the review and approval of grading plans, to the extent such ordinance provisions relate to the design and construction of on-Site improvements that		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	affect drainage, road conditions and traffic flow. A General Plan Consistency analysis for relevant key land use policies is provided in Table 3-21. As identified in Table 3-21, the proposed project would be generally consistent with the General Plan policies and the project's land use impact is considered less than significant. **Oxnard-Camarillo Greenbelt Agreement Map Amendment** Annexation of the northern or southern campus expansion areas to the City of Oxnard would trigger an amendment to the Oxnard-Camarillo Greenbelt Agreement, as approved by City of Oxnard Resolution No. 8616, Board of Supervisors Resolution No. 222, and City of Camarillo Resolution No. 84-9 in February 1984. Specifically, the resolution reads as follows: "Now, Therefore, Be It Resolved, that the Camarillo City Council, the Oxnard City Council, and the Ventura County Board of Supervisors hereby establish this greenbelt for and agree to a policy of non-annexation, non-development, and retention of open space uses…" As such, the proposed project includes a request to the City of Oxnard, City of Camarillo, and County of Ventura to amend Exhibit 2 of the agreement (i.e., the map) to remove the southern campus expansion area (as a non-agricultural campus expansion) and the northern campus expansion area (for consistency) from the Greenbelt. Approval of this request would not otherwise require a material change to the text within the agreement, and the agreement would remain in place. Therefore, if the request is approved by all parties, there would be no significant impact		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	to the Oxnard-Camarillo Greenbelt Agreement. **County of Ventura and City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinances** Currently, the northern and southern campus expansion areas are located within the County of Ventura's SOAR Ordinance. Generally, removing parcels from the County's SOAR ordinance requires a vote of the people. In this case, however, if the requested annexations are approved, these two parcels would fall under the City of Oxnard's SOAR ordinance which *may exempt government facilities which includes* ~~exempts~~ public school, facilities from a vote of the people. Specifically, Section 3, Subsection6 (Exemptions) states: "The provisions of this ordinance otherwise requiring a vote of the people do not apply to nor affect the authority and discretion of the City Council with respect to any roadways designated in Chapter 4, Infrastructure and Services of the 2030 Oxnard General Plan as of adoption and subsequent amendments, construction of public potable water facilities, public schools, public parks or other government facilities, or any development project that has obtained as of the effective date of this initiative a vested right pursuant to state or local law." Therefore, if the proposed annexations are approved, the proposed project would be consistent with the City of Oxnard's SOAR ordinance.		

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.16 Transportation in response to comment letters 5 and 6. Revisions provide additional clarification of the proposed project's transportation components and potential impacts to Transportation.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.16 Transportation			
Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	**Potentially Significant Impact.** As noted above, the 2016–2040 RTP/SCS, addresses all modes of our transportation system, and reflects research and policy initiatives from each mode: active transportation, aviation and airport ground access, corridor planning, goods movement, high-speed rail, intelligent transportation systems, safety and security, transit, and transportation finance (SCAG 2017). The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. Table 3-8 provides a project consistency analysis with relevant 2016 RTP/SCS goals identified by SCAG. A TCS was prepared for the proposed project (see the TCS in Appendix I). As part of the TCS, traffic counts were collected at one roadway segment and nine intersections for a.m. and p.m. peak hours. Trip generation estimates were determined for the project Site based on anticipated enrollment and standard trip generation rates. The trip generation was coordinated with City of Oxnard staff. Trips were distributed based on school routes and student information. The TCS calculated intersection LOS for existing conditions and cumulative conditions with and without the proposed project. Cumulative conditions were developed based on a list of related (approved and pending) projects	**TRAF-1: School Traffic Management Plan (TMP).** RSD develop a school TMP to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps). **TRAF-2: Rose Avenue/Walnut Drive Intersection.** The County's Local Roadway Safety Plan provides several general countermeasures focused on making the path of travel clearer, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement, which will require a longer mast arm, and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	provided by City of Oxnard staff and 2030 General Plan traffic data from the Oxnard Traffic Model (OTM). **Project Trip Generation** **Middle School**. The existing middle school has a student enrollment of 819 students. The project could potentially result in a 250-student increase. Trip generation estimates for the middle school were calculated based on rates contained in the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (ITE 2017) for *Land Use #522 – Middle School/Junior High School*. **District Transportation and Parking Facility.** The project also includes the relocation of the DTPF from E. Vineyard Avenue to N. Rose Avenue. While the relocation would not add traffic to the regional roadway network, it would divert bus and employee trips to the immediate vicinity of the middle school site and its driveways. The DTPF operational statistics provided by RSD are as follows: • 17 school buses in service *(13 buses for routes and 4 spare buses).* All buses will be parked at the DTPF. • Bus traffic consists of 13 a.m. bus routes, four midday bus routes and 13 p.m. bus routes, for a total 30 buses per school day. • Total of 10 office/maintenance employees, work times 6:30 a.m. to 3:30 p.m. The existing middle school is served by six school buses which currently enter the Site and leave to the existing facility on E. Vineyard Avenue after dropping off students. In the future, these six buses will leave the Site to start student pick-	improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times. This may require modifications to the northeast corner (ADA improvements, installation of pedestrian push button post). **TRAF-3: Auto Center Drive/Collins Street Intersection (Project-Specific and Cumulative).** The project-specific analysis found that the proposed project would contribute to the delays experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. The low side street volumes (76 peak hour trips in the p.m. peak hour) and delays would not satisfy any traffic signal warrants. The southbound approach is controlled by a stop sign and contains a shared left-right turn lane. Prohibiting parking along the west curb extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole, however the southbound approach would continue to operate at LOS D. Similarly existing plus project conditions, the southbound approach would continue to operate at LOS D after the restripe to separate turning lanes. This would affect 52 vehicles in the p.m. peak hour	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	up routes and remain on the Site after returning to drop off students. As shown in Table 3-29, the project is expected to generate 792 ADT, with 198 trips occurring in the a.m. peak hour and 48 trips occurring in the p.m. peak hour. **Project Trip Distribution** The project trip distribution for new students is based on the school's attendance boundary illustrated in the TCS (Exhibit 5), with a smaller percentage of trips generated from outside the attendance boundary by new school employees. There is no indication that existing bus routes are subject to change, thus the regional distribution of DTPF trips would not change except in the immediate vicinity of the Site. The distribution percentages are shown in the TCS (Exhibit 6). The site access changes (addition of full-access driveway on Collins Street) would result in changes to existing middle school traffic patterns, where traffic from and to the south now have the option to use the new driveway on Collins Street instead of the existing driveways on Rose Avenue. Exhibit 7 in the TCS shows the anticipated existing diverted traffic volumes and Exhibit 8 in the TCS shows the project-added traffic volumes. Exhibit A in Appendix 2 of the TCS shows the separate middle school trips and District maintenance/bus trips. **Existing Plus Project Roadway and Intersection Operations** Project generated traffic was added to the existing peak hour traffic volumes and levels of service were recalculated for existing plus project conditions. The existing plus project traffic volumes are illustrated in the TCS (Exhibit 9). Table 3-30 and Table 3-31 summarize the	in the southbound left-turn lane. The intersection would not satisfy traffic signal warrants under cumulative plus project conditions.	

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	level of service calculations for existing plus project-specific conditions. Table 3-30 and Table 3-31 indicate that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range, and that the study-area intersections would continue to operate in the LOS A-C range except the Auto Center Drive/Collins Street intersection, which operates at LOS D. The proposed project would contribute to the delays experienced on the stopped approach (Collins Street). Mitigation Measures TRAF-1, TRAF-2, and TRAF-3 have been added to reduce potentially significant project-specific traffic impacts to a less than significant level. **Cumulative Conditions** The City of Oxnard requires that the study-area intersections are analyzed assuming cumulative traffic conditions, which include traffic that could be generated by other developments in the study area that are expected to be constructed in the near future. The following section discusses the cumulative (existing conditions plus approved and pending projects) conditions. **Cumulative Projects Trip Generation and Distribution** The cumulative (existing plus approved and pending projects) conditions serves as a near future baseline to assess potential impacts generated by the proposed project. Cumulative traffic volumes were developed based on approved and pending projects information provided by City of Oxnard and County of Ventura staff. A list of approved and pending development projects in the City of		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	Oxnard was provided by City staff (City of Oxnard 2022a). The location map and *Development Project List* information for the approved and pending projects is included in Appendix 4 of the TCS. The County's Resource Management Agency (RMA) staff provided a parcel map with approved and pending projects within a five-mile radius of the project site. The parcel map information was compared with the project information contained in the County's Approved Projects list and the Pending Project list (County of Ventura 2022b). Trip generation estimates for the approved and pending projects were developed based on rates contained in the ITE Trip Generation Manual and trips were distributed based on the location of each project, project distribution data contained in traffic studies completed for several approved and pending projects, and existing traffic patterns in the study area. The cumulative-added volumes are illustrated in Exhibit B in Appendix 2 of the TCS and the cumulative (existing plus approved and pending) traffic volumes are illustrated in the TCS (Exhibit 10). **Short-Term Future Improvement Projects** The County's short-term improvements (2023–2027 Capital Improvement Program [CIP]) include the following projects: • El Rio Sidewalk Improvements: Construction of sidewalks and intersection improvements on various roads within the El Rio area. This project is associated with the RDV Safe Routes to School (SRTS) program. • Rose Avenue Bike Lanes (Collins-Simon): Construction of Class II bike		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	lanes on Rose Avenue from Collins Street to Simon Way. This will include pavement overlay and bike lane striping improvements on Rose Avenue from south of Collins Street to North of Simon Way, installation of speed feedback signs and other signing additions. **Cumulative Plus Project Roadway and Intersection Operations** The cumulative plus project traffic volumes are illustrated in the TCS (Exhibit 11). Intersection levels of service were recalculated assuming cumulative and cumulative plus project conditions. Table 3-32 and Table 3-33 summarize the cumulative plus project level of service calculations. Tables 3-32 and 3-33 indicate that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue would continue to operate in the LOS A range under cumulative and cumulative plus project conditions. The intersections located in the County are forecast to operate in LOS A-B range, except the Rose Avenue/Orange Drive intersection, which would operate at LOS D in the a.m. peak hour. LOS D is acceptable along throughfares. The intersections located in the City of Oxnard are forecast to operate in the LOS A-C range, except the Auto Center Drive/Collins Street intersection, which would operate at LOS D. **Project Site Access and Circulation** *As illustrated in Exhibit 2 access to the school student drop-off/pick-up loop on Rose Avenue will be provided via the existing ingress only driveway on Rose Avenue opposite Orange Drive and the existing egress only driveway on Rose Avenue opposite Walnut Drive. A new right-turn only driveway located south of*		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	Orange Drive will provide access to parking lot "A". Two driveways located on Rose Avenue north of Walnut Drive will provide access to parking lot "B". Two new driveways are proposed on Collins Drive. The driveways provide access to parking lot "A", the school bus drop-off/pick-up lane and the DTPF. *Field review of school traffic during the morning commute period indicated that the existing drop-off loop system with ingress from the Rose Ave/Orange Drive intersection backs up during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area.* *The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Ave/Collins St intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF.* *It is recommended that the RSD develop a school traffic management plan (TMP) to document and implement measures to promote travel mode shifts, optimize on-*		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	site circulation and provide safety for students, parents, and staff (education, traffic control, physical measures such as speed humps). *A continuous sidewalk is provided along the east side of Rose Avenue from Auto Center Drive to the middle school that connects to the school's internal pedestrian facilities. Crosswalks are provided at the signalized intersections at Collins Street and Walnut Drive. As discussed, the County's 2023-2027 CIP includes several projects in de El Rio neighborhood that will improve pedestrian and bicycle access to the middle school. The RDV SRTS assessment identified locations for construction of (infill) sidewalks, intersection curb extensions and traffic calming measures along students walking corridors to promote walking to school. A new sidewalk will be constructed along the project frontage on Collins Street that connects to an ADA pedestrian sidewalk system on the school site.* *The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. The project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. The SRTS improvement exhibit and Rose Avenue Bike Lanes project exhibits are included in Appendix 3 of the TCS.* ~~*As illustrated in Exhibit 2 of the Oxnard-Camarillo Greenbelt agreement, access to the school student drop-off/pick-up loop on Rose Avenue will be provided via the existing ingress only driveway on Rose Avenue opposite Orange Drive and the existing egress only driveway on*~~		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	~~Rose Avenue opposite Walnut Drive. A new right-turn only driveway located south of Orange Drive will provide access to Parking Lot A. Two driveways located on Rose Avenue north of Walnut Drive will provide access to Parking Lot B. Two new driveways are proposed on Collins Drive. The driveways provide access to Parking Lot A, the school bus drop-off/pick-up lane and the DTPF.~~ ~~Field review of school traffic during the morning commute period indicated that the existing drop-off loop system with ingress from the Rose Ave/Orange Dr intersection backs up during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area.~~ ~~The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Avenue/Collins Street intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF.~~ ~~It is recommended that RSD develop a school traffic management plan (TMP) to~~		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	~~*document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps).*~~ ~~*A continuous sidewalk is provided along the east side of Rose Avenue from Auto Center Drive to the middle school that connects to the school's internal pedestrian facilities. Crosswalks are provided at the signalized intersections at Collins Street and Walnut Drive. As discussed, the County's 2023–2027 CIP includes several projects in the El Rio neighborhood that will improve pedestrian and bicycle access to the middle school. The Rio Del Valle SRTS assessment identified locations for construction of (infill) sidewalks, intersection curb extensions and traffic calming measures along students walking corridors to promote walking to school. A new sidewalk will be constructed along the project frontage on Collins Street that connects to an ADA pedestrian sidewalk system on the project Site.*~~ ~~*The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. The project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. The SRTS improvement exhibit and Rose Avenue Bike Lanes project exhibits are included in Appendix 3 of the TCS.*~~ **Bicycle Access.** The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon		

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	constructed along the north side of Collins Street that connects to an ADA pedestrian sidewalk system on the Site. Pedestrian connections will be provided between the frontage sidewalks and the middle school's internal sidewalk and walkway circulation system. Pedestrian connections should be provided at or nearby each middle school driveway on Rose Avenue and Collins Street to ensure a clear and direct pathway into the Site. **School Bus Transportation** The proposed project includes the relocation of the DTPF from E. Vineyard Avenue to N. Rose Avenue. While the relocation would not add traffic to the regional roadway network, it would divert bus and employee trips to the immediate vicinity of the Site and its driveways. The DTPF operational statistics provided by RSD are as follows: • 17 school buses in service *(13 buses for routes and 4 spare buses).* All buses will be parked at the facility. • Bus traffic consists of 13 a.m. bus routes, four midday bus routes, and 13 p.m. bus routes, for a total 30 buses per school day. • Total of 10 office/maintenance employees, work times 6:30 a.m. to 3:30 p.m. The existing middle school is served by six school buses which currently enter the Site and leave to the former facility on E. Vineyard Avenue after dropping off students. In the future, these six buses will leave the Site to start student pick-up routes and remain on the Site after returning to drop off students. Field review of school traffic during the morning commute period indicated that		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	the existing drop-off loop system with ingress from the Rose Avenue/Orange Drive intersection backs up during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area. The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Avenue/Collins Street intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF. Buses will travel via designated routes with frequent stops within the school boundary area at the on-Site bus drop-off and pick-up area. Buses will arrive prior to start of bell schedule (i.e., 8:21 a.m.) and depart after end of regular bell schedule (i.e., 2:53 p.m.). The design of the school circulation system will incorporate school bus turning requirements (swept paths) along the on-Site bus route. **Parking** Figure 2-3 indicates that the proposed parking supply consists of 339 standard		

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

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	feedback sign and overhead flashing beacons are provided on Rose Avenue in both directions. *Review of the intersection recent five-year collision history (2017–2021) shows a total of nine collisions with several correctable accidents: three broadsides, three rear-ends, and an improper turn. One pedestrian ROW violation was reported in 2021 (eastbound right-turn vs. southbound pedestrian in crosswalk).* The County's Local Roadway Safety Plan provides several general countermeasures focused on making the path of travel clearer, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). As discussed previously, the Rose Avenue Bike Lanes (Collins-Simon) project will install Class II bike lanes on Rose Avenue, which would improve bicycle traffic conditions. Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement, which will require a longer mast arm, and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times. This may require modifications to the northeast corner (ADA improvements, installation of pedestrian push button post). **Improvement Measures** *The project-specific analysis found that the project may contribute to the delays*		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. Review of collision data provided by the City (included in Appendix 7 of the TCS) indicates that the collision history does not satisfy Traffic Signal Warrant 7 – Crash Experience Warrant (2014 CAMUTCD, Rev 6) of 5 or more crashes reported in a 12-month period that are susceptible to correction by a traffic signal. In addition, 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 project-specific analysis found that the project may contribute to the delays experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. The low side street volumes (76 peak hour trips in the p.m. peak hour) delays would not satisfy any traffic signal warrants.*~~ The southbound approach is controlled by a stop sign and contains a shared left-right-turn lane. Prohibiting parking along the west curb extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole; however, the southbound approach would continue to operate at LOS D. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. Table 3-34 shows the mitigated intersection levels of service. It is recommended that RSD develop a school TMP to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents, and staff		

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

- **The following revision was made to the Summary of Impacts, Mitigation Measures and Level of Impact After Mitigation Table Section 3.18 Utilities and Service Systems in response to comment letters 4, 5 and 6. Revisions provide additional clarification of the proposed project's potential water use and impacts to Utilities and Service Systems.**

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
3.18 Utilities and Service Systems			
Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	**Potentially Significant Impact.** Proposed average sewer generation is estimated as a factor of the site's water demand. Water demand was calculated in the Proposed Rio Del Valle School Expansion Domestic Water Demand and Allocations Technical Memorandum prepared by Jensen (Jensen 2022b). Table 3-40 shows the expected water demands for the Site's wastewater-producing sources. Per the City's Wastewater Rate Sheet effective September 1, 2021 (Appendix 5.3), schools are charged assuming an 85% rate of water return. Therefore, it is estimated that wastewater flows generated by domestic metered project Site areas will be 85% of their water demands. ~~*It is estimated that 25% of bus wash water demand will discharge to the City's sewer system. Although RSD will be required to recycle wash water, some wastewater is expected from maintenance activities such as back flushing filters.*~~ *The bus wash wastewater will be recycled using a Wash Water Restoration System, or similar equipment. This system will recycle and reuse water with an expected maximum waste stream of 25% of used water. Based on these assumptions, project-generated wastewater production is estimated at 5.339 AFY, or 4,766 gpd (Jensen 2022c).*	**UTIL-1:** RSD shall submit the anticipated sewer flow rates for the proposed project to the City so that it can be analyzed using the City's sewer model. Based on the results, RSD shall coordinate with the City regarding the final sewer design including any required improvements needed to provide adequate sewer service to the project Site.	Less than Significant Impact

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	According to the City of Oxnard Wastewater Master Plan Update, the 15-inch line in Auto Center Drive has sufficient capacity to meet hydraulic requirements for its projected ultimate demand. The 8-inch main upstream in Via Estrada and Collins Street was not evaluated as part of the Jensen study. Additionally, the project Site falls outside of the Master Plan Update Study Area and therefore was not considered a potential contributor to the City's wastewater system. The increase in sewer flow due to the proposed project was analyzed to show its impact on existing infrastructure. It was assumed that the sewer main is at the maximum acceptable depth/diameter ratio for peak flows in the existing condition. The increase in sewer flow created by the proposed project was compared to the assumed existing condition flowrate. Pipe capacity analysis results are included in Appendix 5.4 of the Sewer Preliminary Investigation (Jensen 2022c). Table 3-41 summarizes these pipe capacity analysis results. The increased flows do not produce a measurable increase in maximum flow depth. Therefore, the d/D ratio will not increase during peak wet weather flows, even if the existing condition is already at the maximum d/D ratio. The existing 8-inch sewer line that the project Site will connect to, as well as the 15-inch trunk line immediately downstream, meet City of Oxnard standards and capacity criteria. They are sufficiently sized to accommodate the needs of the proposed project. Therefore, the proposed project impacts on existing wastewater treatment facilities and sewer systems will be		

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Impact After Mitigation
	designed to meet City requirements. As part of standard development procedures, Site plans would be submitted to the City of Oxnard for review and approval to ensure adequate wastewater capacity prior to construction. Therefore, with the implementation of UTIL-1 and compliance with existing City of Oxnard requirements, project impact to wastewater capacity would be less than significant.		

3.2.2 Changes to Table of Contents

- **The following revision was made to the TOC List of Tables.**

List of Tables

Table 2-5 Land Use Project Components was added in response to comment letters 5 and 6, to clarify land use designations of the proposed project. The original Table 2-5 was renumbered to 2-6 and original Table 2-6 was renumbered to 2-7.

3.2.3 Changes and Errata to Section 2.0 Project Description and Environmental Setting

Section 2.4 Project Description

- **The following revision was made to Section 2.4 Project Description, paragraph one. Revision clarifies acreage of the southern campus expansion area.**

The proposed project includes the expansion of the Rio del Valle Middle School (RDV) campus and related programs located at 3100 Rose Avenue in unincorporated County of Ventura (Figure 2-1). The primary access to the main campus is off Rose Avenue. The existing campus is approximately 30.2 acres, including the 20.2-acre main campus (APN 144-0-110-445) and 10 acres of active agricultural lands (a portion of APN 144-0-110-225) to the north of the main campus buildings. The proposed project would add approximately 11.*31*~~- 1~~ acres to the south (a portion of APN 144-0-110-590) that the RSD proposes to develop with new educational and support facilities, resulting in an approximately enhanced 41.3-acre campus (project Site). The RSD is currently in escrow to acquire the southern campus expansion area. All three parcels (southern campus expansion area, northern campus expansion area and main campus) associated with the proposed project are proposed for annexation into the City of Oxnard. The geographic coordinates of the project Site are approximately Latitude 34° 14' 2.39" North, Longitude 119° 9' 10.61" West (Google Earth Pro 2021). Surface elevations at the project Site are approximately 92 feet above mean sea level (EDR 2021). The project Site is generally surrounded by agricultural lands and residential uses to the north, agricultural lands to the east, commercial uses (car dealerships) to the south, and residential uses to the west, as shown in Figure 2-2. The land use designations for the project Site are identified in Table 2-2.

Section 2.4 Project Description

- **The following revision was made to Section 2.4 Project Description, paragraph three, in response to comment letters 5 and 6. Revision clarifies number of buses used by the proposed project and acreage of the southern campus expansion area.**

The expanded campus shall provide significant health and safety improvements, additional on-Site parking, and a bus turnout lane. Six of the District's 17 buses *(13 buses for routes and 4 spare buses)* are used for RDV student transportation during and after school programs; these buses would be housed on the southern 11.*31*-acre addition to the campus with the buildout of the proposed project. These construction activities are estimated to take 18 months. Phase I activities will also include replacement and relocation of some of the existing recreational facilities and parking within the existing main campus. To assist in alleviating parking and overcrowding issues, some of the playfields and Parking Lot B in the main campus were completed in fall 2022.

Section 2.4 Project Description

- **The following revision was made to Section 2.4 Project Description, paragraph three, in response to comment letters 5 and 6. Revision clarifies that shared uses of the Gymnasium will not expand as a result of the project, as follows.**

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

Section 2.4 Project Description

- **The following minor text revisions were made to Section 2.4 Project Description, under Phase I description, in response to comment letters 5 and 6.**

The RSD ~~*proposes*~~ *requests* to annex all three parcels (southern campus expansion area, northern campus expansion area, and main campus) into the City of Oxnard during Phase I. Phase I activities for the proposed project will include improvements on the western portion of the southern campus expansion area shown on Figure 2-3. Per the City of Oxnard Municipal Code, Chapter 21, Article III, utility undergrounding associated with the proposed project will likely be necessary, and utility undergrounding along public rights-of-way (ROWs) will likely occur as part of Phase I. Construction will start for most of the following improvements after approval of the EIR, anticipated in ~~*December*~~ *January* ~~*2022*~~ *2023.* These construction activities are estimated to take 18 months. Phase I activities will also include replacement and relocation of some of the existing recreational facilities and parking within the existing main campus. To assist in alleviating parking and overcrowding issues, some of the playfields and Parking Lot B in the main campus were completed in fall 2022.

The southern campus expansion area is approximately 11.31 acres in size and is located on a portion of current APN 144-0-110-590. RDV is currently in escrow to acquire the southern campus expansion area, which would extend the existing boundary of the RDV campus south to Collins Street. The current western and eastern property lines would continue southward on their current bearings, until terminating at Collins Street. Access to the project Site is proposed via driveway connections to Collins Street, from the campus Parking Lot A, and the proposed Parking Lot B off Rose Avenue. A 25-foot-wide access road will run from south to north providing a secondary point of access through the existing RDV parking area. The DTPF ~~will consist~~ *relocated to the southern campus expansion area as a part of the proposed project will consist of* a 7,500 sq. ft. maintenance building, two 1,080 sq.

ft. portable buildings, 528 sq. ft. restroom, and conversion of the approximately 3,130 sq. ft. existing residential structure located on the project Site to office use by RSD Maintenance and Operations staff. The DTPF including buses, can be completely closed off from the general public or staff parking areas, allowing for enhanced security and operational options. Existing utility lines are present within the southern campus expansion area. A detailed map showing current land use of the southern campus expansion area is shown in Figure 2-4.

Section 2.4 Project Description

- **The following text additions were made to Section 2.4, Project Description, in response to comment letters 5 and 6. The text additions include proposed City of Oxnard land use designations.**

Proposed Jurisdiction, General Plan, and Zoning, and Similar Changes.

Table 2-5 identifies the proposed jurisdiction, General Plan land use designation, zoning designation, greenbelt, water district, Sphere of Influence (SOI), City Urban Growth Boundary (CURB), and Save Open Space and Agricultural Resources (SOAR) changes, as well as the project components generally located within each project area.

Section 2.4 Project Description

- Table 2-5 was added to Section 2.4, Project Description in response to comment letters 5 and 6 to clarify potential Land Use Project Impacts related to City of Oxnard land use designations.

Section 2.4 Project Description

- **The following revision was made to Section 2.4 Project Description under Permitting Pathway to paragraph seven. The revision clarifies the discretionary role of the City of Oxnard in exempting the project from SOAR.**

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

Section 2.5 Required Permits and Approvals

- Original Table 2-5 was renumbered Table 2-6.

Section 2.6 Cumulative Project List

- Original Table 2-6 was renumbered Table 2-7.

Table 2-5 Land Use Project Components

Project Attribute	Parcel		
	Existing Main Campus (144-0-110-445)	Northern Campus Expansion Area (144-0-110-225 [Portion])	Southern Campus Expansion Area (144-0-110-590 [Portion])
Jurisdiction	Current: Ventura County Proposed: City of Oxnard	Current: Ventura County Proposed: City of Oxnard	Current: Ventura County Proposed: City of Oxnard
Ventura County General Plan Land Use Designation	Current: Very Low Density Residential Proposed: N/A	Current: Agricultural Proposed: N/A	Current: Agricultural Proposed: N/A
El Rio/Del Norte Area Plan Land Use Designation	Current: Institutional with a 10-acre minimum lot size Proposed: N/A	Current: Agricultural with a 40-acre minimum lot size Proposed: N/A	Current: Agricultural with a 40-acre minimum lot size Proposed: N/A
City of Oxnard General Plan Land Use Designation	Current: School Proposed: Public/Semi-Public	Current: Agriculture Proposed: Public/Semi-Public	Current: Agriculture Proposed: Public/Semi-Public
Zoning Designation	Current (Ventura County): RE-20,000 S.F. Proposed (City of Oxnard): Community Reserve (C-R)	Current (Ventura County): AE-40 ac/MRP Proposed (City of Oxnard): C-R	Current (Ventura County): AE-40 ac/MRP Proposed (City of Oxnard): C-R
Oxnard-Camarillo Greenbelt	Current: Outside Proposed: Outside	Current: Within Proposed: Outside	Current: Within Proposed: Outside
Water District	Current: On-Site well United Water Conservation District City of Oxnard Proposed: Calleguas Municipal Water District	Current: Agricultural Well Water Proposed: Calleguas Municipal Water District	Current: Agricultural Well Water Proposed: Calleguas Municipal Water District
City of Oxnard Sphere of Influence (SOI)	Current: Within Proposed: Within	Current: Outside Proposed: Within	Current: Outside Proposed: Within
City of Oxnard City Urban Growth Boundary (CURB)	Current: Within Proposed: Within	Current: Outside Proposed: Within	Current: Outside Proposed: Within

Project Attribute	Parcel		
	Existing Main Campus (144-0-110-445)	Northern Campus Expansion Area (144-0-110-225 [Portion])	Southern Campus Expansion Area (144-0-110-590 [Portion])
City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinance	Current: N/A Proposed: Outside	Current: N/A Proposed: Outside	Current: N/A Proposed: Outside
County of Ventura SOAR Ordinance	Current: Outside Proposed: N/A	Current: Within Proposed: N/A	Current: Within Proposed: N/A
Project Components*	Revised circulation and parking (including new parking areas), new and/or relocated recreational facilities (e.g., track and flag football field, tennis and/or handball courts, baseball and softball fields, soccer fields), restrooms and storage, new classrooms, fencing, and landscaping.	New agricultural learning program (including an outdoor lecture area) and pathway.	New circulation and parking (including new parking areas and fire access road), District Transportation and Parking Facility (including a maintenance building and parking area), new recreational facilities (e.g., volleyball courts, jogging path, soccer field, baseball and/or softball field, basketball courts), new buildings (e.g., multi-purpose building, portables, restrooms), classrooms, stormwater retention basin, fencing, and landscaping.

Notes: *The project components listed are representative and are not necessarily all-inclusive.
N/A Not Applicable

Section 2.4 Project Description

- **The following revisions were made to Table 2-5 in Section 2.4 Project Description. The table was renumbered to Table 2-6 and text was added, to clarify permits and approvals needed, as follows.**

Table 2-6. Anticipated Permits and Approvals

Agency	Permit/Approval
California Department of Education (CDE)	Approval of construction plans and Expanded Site Plan
California Department of General Services, Division of the State Architect (DSA)	Approval of construction plans and Expanded Site Plan
California Department of Toxic Substances Control (DTSC)	Approval of Preliminary Environmental Assessment (PEA) and Supplemental Site Investigation (SSI) for Southern Campus Expansion Area
Calleguas Municipal Water District (CMWD)	Annexation Request
City of Camarillo	Oxnard-Camarillo Greenbelt Modification
City of Oxnard	Annexation Request; General Plan Amendment *(to change the City Urban Restriction Boundary, SOAR land designation, Sphere of Influence, and Land Use Designation);* Pre-Zoning;* *Tentative Tract Map and/or Lot Line Adjustment;* *Special Use Permit for the School (pursuant to the C-R Zone requirements);* *Special Use Permit or Development Design Review Permit for the proposed District Transportation and Bus Parking facilities (the final permit type will be determined by the requested pre-zoning Zoning Designation);* and Oxnard-Camarillo Greenbelt Modification
Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB)	Storm Water Pollution Prevention Plan
Rio School District (RSD)	Approval of Project (Educational Specifications, Design/Construction Funding and Associated Contract Approvals), Adoption and Approval of EIR and MMRP
County of Ventura	Oxnard-Camarillo Greenbelt Modification
Ventura Local Agency Formation Commission (LAFCo)	City of Oxnard Annexation, CMWD Annexation, associated Sphere of Influence (SOI) and City Urban Growth Boundary (CURB) adjustments

Section 2.4 Project Description

- **The following revision was made to Section 2.4 Project Description, under Permitting Pathway, paragraph 9, in response to comment letters 5 and 6.**

However, the determination of the SOAR exemption noted above is to be made by the City of Oxnard City Council. An ~~an~~ annexation to the City of Oxnard would also trigger an amendment to the Oxnard-Camarillo Greenbelt Agreement, as approved by City of Oxnard Resolution No. 8616, Board of Supervisors Resolution No. 222, and City of Camarillo Resolution No. 84-9 in February 1984. Specifically, the resolution reads as follows:

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

3.2.4 Changes and Errata to Section 3.0 Environmental Analysis

Section 3.1.2.3 Project Impacts

- **The following revisions were made to Section 3.1.2.3, Paragraph 6, in response to comment letters 5 and 6, as follows.**

The existing main campus has a Ventura County General Plan land use *designation of Very Low Density Residential (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Institutional with a 10-acre minimum lot size (Ventura County 2020a: Figure 1b),* and *a* zoning designation of RE-20,000 SF. *The* ~~*the*~~ northern campus *expansion area* and *the* southern *campus* expansion area~~s~~ have a Ventura County General Plan land use *designation of Agricultural (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Agricultural with a 40-acre minimum lot size (Ventura County 2020a: Figure 1b), and a* ~~a~~ zoning designation~~s~~ of AE-40 ac/MRP. Schools are prohibited within the County's AE-40 zone. However, the proposed project includes annexation into the City of Oxnard, thereby the County's land use and zoning designations would no longer be applicable to the project Site.

Section 3.2.1.1 Existing Conditions

- **The following revisions were made to Section 3.2.1.1, Paragraph 6, in response to comment letter 5. Revisions provide clarification of land use designations, as follows.**

The existing campus has a Ventura County General Plan land use *designation of Very Low Density Residential (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Institutional with a 10-acre minimum lot size (Ventura County 2020a: Figure 1b),* and *a* zoning designation of RE-20,000 SF. *The* ~~*the*~~ northern campus expansion area and southern *campus* expansion area~~s~~ have a Ventura County General Plan land use *designation of Agricultural (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Agricultural with a 40-acre minimum lot size (Ventura County 2020a: Figure 1b),* and *a* zoning designation of AE-40 ac/MRP. The City of Oxnard General Plan land use designation for the existing campus is School; the designation for the northern campus *expansion area* and southern *campus* expansion area~~s~~ is Agriculture.

Section 3.2.2.3 Project Impacts

- **The following additions were made to Paragraph 2, to add mitigation measure AG-2, in response to comment letters 5 and 6.**

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

Section 3.2.2.3 Project Impacts

- **The following text was added to Paragraph 13 and 14, in response to comment letters 5 and 6, as follows.**

As discussed above, impacts were identified associated with the proposed project's conversion of approximately the southern campus expansion area. However, of these 10.8 acres, only 8.7 acres are actively used for agricultural production. The proposed project would not convert the approximately 10 acres on the northern campus expansion area of the project Site to a non-agricultural use and the District will commit to retaining the agricultural use of the northern campus expansion area for a minimum of 10 years, see Mitigation Measure AG-2. Therefore, Mitigation Measure*s* AG-1 *and AG-2 are* ~~is~~ provided to mitigate for the loss of important farmland. Nonetheless, conversion of agricultural land would remain a significant and unavoidable impact.

Section 3.2.2.3 Project Impacts

- **The following text was added to Paragraph 15, in response to comment letters 5 and 6, as follows.**

Would the project conflict with existing zoning for agricultural use?

The existing campus has a Ventura County General Plan land *use designation of Very Low Density Residential (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Institutional with a 10-acre minimum lot size (Ventura County 2020a: Figure 1b),* and *a* zoning designation of RE-20,000 SF. *The*~~*the*~~ northern campus *expansion area* and *the* southern campus expansion area have a Ventura County General Plan land use *designation of Agricultural (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Agricultural with a 40-acre minimum lot size (Ventura County 2020a: Figure 1b),* and *a* zoning designation~~s~~ of AE-40 ac/MRP. Schools are prohibited within the County's AE-40 zone. However, because the proposed project includes annexation into the City of Oxnard, the County's land use and zoning designations would no longer be applicable to the project Site.

Section 3.3.2.5 Mitigation Measures

- **The following revision was made to Mitigation Measure AQ-1 under Section 3.5.2.5 Mitigation Measures, in response to comment letters 2. The revisions are to the type of construction equipment used and the exterior paint VOC content, as follows.**

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

- All soil excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed soil areas. Watering shall be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations.
- All clearing, earth moving, and excavation activities shall cease during periods of winds greater than 20 miles per hour (mph) (averaged over one hour), if disturbed material is easily windblown, or when dust plumes of 20% or greater opacity impact public roads, occupied structures, or neighboring property.
- All fine material transported off-Site shall be either sufficiently watered or securely covered to prevent excessive dust.
- All haul trucks shall be required to exit the Site via an access point where a gravel pad or grizzly has been installed.
- Stockpiles of soil or other fine loose material shall be stabilized by watering or other appropriate method to prevent wind-blown fugitive dust.
- Once initial leveling has ceased, all inactive soil areas within the construction Site shall either be seeded and watered until plant growth is evident, treated with a dust palliative, or watered twice daily until soil has sufficiently crusted to prevent fugitive dust emission.
- On-Site vehicle speed should be limited to 15 mph.
- All areas with vehicle traffic should be paved, treated with dust palliatives, or watered a minimum of twice daily.
- Properly maintain and tune all internal combustion engine powered equipment.
- Require employees and subcontractors to comply with the CARB idling restrictions for compression ignition engines; and use California ultra-low sulfur diesel fuel; use construction equipment with Tier ~~4~~2 engines; and use interior and exterior paint with a VOC content of ~~100~~50 grams per liter.

Section 3.2.2.5 Mitigation Measures

- **The following minor errata was revised in Section 3.2.2.5, paragraph one.**

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

Section 3.2.2.5 Mitigation Measures

- **The following Mitigation Measure, AG-2, was added to the Agricultural Resources and Forestry based mitigation measures, in response to comment letters 5 and 6.**

AG-2: *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.*

Section 3.3.2.3 Project Impacts

- **Table 3-11 was replaced to reflect updated construction emissions calculations, in response to comment letter 2, as follows.**

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

~~Project Phase~~	~~VOCs~~	~~NO_x~~	~~SO_x~~	~~PM_{10}~~	~~$PM_{2.5}$~~
~~Construction Emissions 2023~~	~~1.08~~	~~19.31~~	~~37.16~~	~~0.06~~	~~8.34~~
~~Construction Emissions 2024~~	~~49.97~~	~~12.44~~	~~19.44~~	~~0.04~~	~~0.68~~
~~Threshold Significance~~	~~None~~	~~None~~	~~None~~	~~None~~	~~None~~
~~Significant?~~	~~No~~	~~No~~	~~No~~	~~No~~	~~No~~

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

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

Project Phase	*VOCs*	*NO_x*	*CO*	*SO_x*	*PM_{10}*	*$PM_{2.5}$*
Construction Emissions 2023	*0.83*	*4.00*	*33.44*	*0.06*	*8.34*	*4.57*
Construction Emissions 2024	*13.08*	*3.97*	*19.22*	*0.04*	*0.71*	*0.23*
Threshold Significance	*None*	*None*	*None*	*None*	*None*	*None*
Significant?	*No*	*No*	*No*	*No*	*No*	*No*

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

Section 3.3.2.3 Project Impacts

- **Table 3-12 was replaced to reflect updated construction emissions calculations, in response to comment letter 2, as follows.**

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

~~Project Phase~~	~~CO~~	~~VOCs~~	~~NOx~~	~~SO_x~~	~~PM_{10}~~	~~$PM_{2.5}$~~
~~Operation Emissions~~	~~1.71~~	~~2.11~~	~~6.26~~	~~0.02~~	~~2.16~~	~~0.59~~
~~Threshold of Significance~~	~~None~~	~~25~~	~~25~~	~~None~~	~~None~~	~~None~~
~~Significant?~~	~~No~~	~~No~~	~~No~~	~~No~~	~~No~~	~~No~~

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

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

Project Phase	VOCs	NOx	CO	SO_x	PM_{10}	$PM_{2.5}$
Operation Emissions	1.81	3.11	9.37	0.03	3.25	0.89
Threshold of Significance	None	25	25	None	None	None
Significant?	No	No	No	No	No	No

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

Section 3.5.2.3 Project Impacts

- **The following revisions were made to paragraph 1 under Section 3.5.2.3 Project Impacts, in response to comment letters 5 and 6. The revisions clarify the approach to avoiding potential cultural resources impacts.**

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

The records search and NAHC sacred lands search did not identify any known historical resources within or adjacent to the project Site. The historic map and aerial review and Phase I archaeological survey did identify two historic era-built environment resources: the RVD buildings and infrastructure and a residential building constructed between 1947 and 1967. These resources are unrecorded and have not been evaluated for significance eligibility as historical resources under CEQA. Project design indicates a modification to the existing RVD and residential building at 2600 N Rose Avenue, Oxnard, California. It is recommended that a qualified architectural historian assess whether the project will have a potential significant impact to these historic era resources. ~~*Incorporation of Mitigation Measure CUL-1*~~ *After the assessment and prior to final design and construction, appropriate measures will be incorporated that would protect any identified historical resource from potential significant adverse changes, in compliance with CEQA Sections 15126.4(a)(l)(B) and 15126.4(b). Incorporation of Mitigation Measure CUL-1 and CUL-4* would reduce the potential impact on historical resources to less than significant.

Section 3.5.2.5 Mitigation Measures

- **The following mitigation measure, CUL-4, was added to the Cultural Resources based mitigation measures, in response to comment letters 5 and 6.**

CUL-4: Historic Resources Protection. *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.*

Section 3.5.2.6 Level of Impact After Mitigation

- **The following revisions were made to paragraph one to update the mitigation measures related to cultural resources.**

Based on implementation of, and compliance with, Mitigation Measures CUL-1, CUL-2, *CUL-3* and *CUL-4*, the potential impacts of the proposed project on cultural resources, tribal cultural resources, and human remains (protocols per PRC Section 5097.98 and Section 7050.5 of the State HSC) would be reduced to less than significant

Section 3.6.2.3 Level of Impact After Mitigation

- **The following changes were made to paragraph eleven in response to comment letters 1, 5 and 6. The changes clarify project transportation effects.**

The new District Transportation and Parking Facility that will be co-located with the expanded middle school facility, will create a separate entrance for bus traffic, both to access the parking/maintenance area and to drop off or pick up students (Stantec 2022b). This will improve the efficiency of the drop-off and pick-up processes for both bus traffic and vehicle traffic. Improved efficiency in these processes translates directly into a smaller amount of fuel used per student per day under proposed conditions. In addition, because the new bus facility will be co-located with RDV Middle School, *a~~n~~ total daily ~~efficiency~~ reduction of 18 miles ~~efficiency~~ in the ~~total~~* length of bus trips *~~should~~ will* be realized for the six (6) daily *morning bus trips and the six (6) daily afternoon bus trips ~~for~~* serving the students of RDV Middle School. The remaining *18~~24~~* bus trips serving the rest of the RSD *also ~~should at least not~~* will *~~de increase~~ decrease the total travel distance by three (3) miles per day ~~increase~~* due to the new facility location *~~and may in fact decrease because the new facility is more centrally located within the RSD~~*. Therefore, the total bus mileage will be reduced by 21 miles per day*, and the* expected energy use per student, *~~is expected to~~ will* decrease *~~with~~ as a result of* the expanded middle school facility *and co-located bus facility.*

Section 3.8.2.3 Project Impacts

- **The following minor errata in paragraph one was corrected in response to comment letter 1.**

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

The proposed project would generate GHGs during construction and operation activities. Detailed GHG calculation input data and results are presented in Appendix *~~B~~C*. A summary of GHG emissions from construction and operation activities of the proposed project including, significance with respect to the SCAQMD threshold of 10,000 MT per year of CO_2e is presented in Table 3-16.

Section 3.8.2.3 Mitigation Measures

- **Table 3-16 was replaced to reflect updated annual greenhouse gas emissions calculations, in response to comment letters 5 and 6, as follows.**

~~Table 3-16.~~ ~~Annual Greenhouse Gas Emissions~~

~~Phase~~	~~CO_2e (MT)~~
~~Construction 2023~~	~~416~~
~~Construction 2024~~	~~186~~

~~Operation~~	~~388~~
~~Threshold~~	~~10,000~~
~~Significant?~~	~~No~~

Table 3-16. Annual Greenhouse Gas Emissions

Phase	*CO_2e (MT)*
Construction 2023	*427*
Construction 2024	*191*
Operation (per year)	*519*
Threshold	*10,000*
Significant?	*No*

Section 3.9.1.2 Regulatory Setting

- **The following errata was corrected in Section 3.9.1.2 Regulatory Setting, under State, paragraph two.**

The DTSC and the Regional Water Quality Control Boards (RWQCBs) have been assigned jurisdiction over hazardous chemical materials management by the State Legislature. DTSC administers the State's hazardous waste program and implements the federal (RCRA) program in California. The nine RWQCBs in the State issue and enforce National Pollutant Discharge Elimination System (NPDES) permits and regulate leaking underground storage tanks (LUSTs) and other sources of groundwater contamination. Other State agencies involved in hazardous materials management are the Department of Industrial Relations (State OSHA implementation), Office of Emergency Services (OES; California Accidental Release Prevention implementation), CDFW, CARB, Caltrans, State OEHHA (Proposition 65 implementation), the Department of Resources Recycling and Recovery (CalRecycle) (operation of landfills and waste handling/disposal facilities), and the State of California ~~*Division of Oil, Gas, and Geothermal Resources (DOGGR).)*~~ Geologic Energy Management Division (CalGEM).). The enforcement agencies for hazardous materials transportation regulations are the California Highway Patrol (CHP) and Caltrans (LSA 2013).

Section 3.9.1.2 Regulatory Setting

- **The following minor revisions were made to Section 3.9.1.2 Regulatory Setting, under Oil and Gas Resources Regulations (Title 14, Chapter 4).**

Oil and Gas Resources Regulations (Title 14, Chapter 4)

This chapter of the CCR establishes requirements for the development, regulation, and conservation of oil and gas resources. Specifically, Section 1723 et seq. establishes well abandonment rules for oil and gas wells and Section 1981 lays out standards for modifying existing wells and expands standards for plugging abandoned wells. The ~~California DOGGR~~ *CalGEM* supervises the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells to ensure compliance with Title 14 and other regulatory requirements for oil and gas development (LSA 2013).

Section 3.9.2.2 Regulatory Setting

- **The following changes were made to Section 3.9.2.2 Significance Thresholds, in response to comment letter 6. Revisions include updated significance threshold language for the City of Oxnard.**

The thresholds for hazards and hazardous materials impacts used in this analysis are consistent with Appendix G of the CEQA Guidelines and the 2017 City of Oxnard CEQA Guidelines. *Only the two significance thresholds discussed below were carried over from the Initial Study for further evaluation in the EIR.* The proposed project would result in a significant impact if it were to:

• Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, *in quantities or a manner that would create a substantial hazard?*

• Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a ~~significant~~ *substantial* hazard to the public or the environment?

Section 3.9.2.3 Project Impacts

- **The following changes were made to Section 3.9.2.3 Project Impacts to include significance threshold language from City of Oxnard.**

Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, *in quantities or a manner that would create a substantial hazard?*

Section 3.9.2.3 Project Impacts

- **The following text was added to Section 3.9.2.3 Project Impacts in response to comment letter 6.**

No vehicle maintenance will be performed at the future new RDV Middle School bus parking facility. All vehicle maintenance (oil changes, etc.) will be performed at Gibbs Truck Center (2201 E. Ventura Blvd Oxnard, CA 93036) as is done currently. The buses will be fueled at SC Fuels (3815 E. Vineyard Avenue Oxnard, CA 93036) as is done currently. No automotive maintenance products such as motor and transmission oil, paint, or fuel will be stored or disposed of at the Site.

The Ventura County Multi-Hazard Mitigation Plan (County of Ventura 2015) was adopted by the City of Oxnard to serve as a guide for the City's response to emergencies/disasters. The project is in compliance with the Ventura County Multi-Hazard Mitigation Plan.

The City of Oxnard Fire Department leads emergency response activities within City of Oxnard that would include responses to large hazardous spills. The Ventura County Multi-Hazard Mitigation Plan describes the coordination of response efforts. The responsibility for responding to and remediating spills would be similar to existing conditions.

Section 3.9.2.3 Project Impacts

- **The following text was removed from Section 3.9.2.3 Project Impacts in response to comment letter 6.**

~~*The Ventura County Multi-Hazard Mitigation Plan (County of Ventura 2015) was adopted by the City of Oxnard to serve as a guide for the City's response to emergencies/disasters. The project is in compliance with the Ventura County Multi-Hazard Mitigation Plan.*~~

~~*The City of Oxnard Fire Department leads emergency response activities within City of Oxnard that would include responses to large hazardous spills. The Ventura County Multi-Hazard Mitigation Plan describes the coordination of response efforts. The responsibility for responding to and remediating spills would be similar to existing conditions.*~~

Section 3.9.2.3 Project Impacts

- **The following text was added to Section 3.9.2.3 Project Impacts in response to comment letter 6. Changes reflect approach to potential Hazards and Hazardous Materials effects.**

Tetra Tech determined that no further action is recommended for the 10-acre northern campus expansion area for as long as the northern campus expansion area is used for agricultural production. 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. With the implementation of Mitigation Measure HAZ-3, the proposed project would have a less than significant impact.

Section 3.9.2.5 Mitigation Measures

- **The following mitigation measure was added to Section 3.9.2.5 Mitigation Measures, in response to comment letter 6.**

HAZ-3: *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.*

Section 3.9.2.6 Level of Impact After Mitigation

- **The following revisions were made to Section 3.9.2.6 Level of Impact After Mitigation to include added mitigation measure HAZ-3.**

Implementation of, and compliance with, Mitigation Measures HAZ-1, ~~*and*~~ HAZ-2, *and HAZ-3* would reduce all potentially significant impacts related to hazards and hazardous materials to a less than significant level.

Section 3.10.1.1 Existing Conditions

- **The following revision was made to Section 3.10.1.1 Existing Conditions, under Allocation. Changes are based on revised Appendix H.**

Locally, domestic water supply for RSD facilities has historically been provided by three active groundwater wells and domestic water connections with the City of Oxnard and UWCD. The three wells are located at Rio Real School, RDV Middle School, and the El Rio Elementary School. After the FCGMA adopted Ordinance E, water allocations for these three wells were reduced to a total of 52.074 AFY. El Rio Elementary School site was sold to a developer and is to be replaced by the Rio Urbana residential community. The Rio Urbana project included the annexation of the site into the City of Oxnard and the transfer of 40.399 AFY of groundwater pumping allocation for the on-Site well. Following this transfer, the RSD has 11.675 AFY water allocations remaining for the two wells located at Rio Real School and RDV Middle School. ~~*54.6*~~ *47.628* AFY of FCGMA water allocations are to be transferred to RSD

with the newly-acquired land to expand the RDV campus. The water transfer amount will need to be finalized in a formal written agreement with the sellers of both parcels. With this transfer, RSD will have a total of ~~66.275~~ 59.303 AFY of FCGMA water allocations (Jensen 2022b).

Section 3.10.1.1 Existing Conditions

- **The following revision was made to Section 3.10.1.1 Existing Conditions, under Potable Water use. Changes are based on revised Appendix H.**

Following the Rio Urbana and new farmland water allocation transfers, the City requires selected new development projects to design and construct dual piping systems within their project areas to facilitate the delivery of recycled water for non-potable uses, such as irrigation of landscaping and athletic fields. Infiltration of water used for irrigation or other outdoor uses and stored in the infiltration basin would contribute to recharge of the underlying basin. RSD will have a surplus of 24.685 AFY (~~66.275~~ 59.303 AFY – 41.59 AFY = 24.685 AFY) water allocations to supply for the two existing schools before the RDV expansion (Jensen 2022b).

Section 3.10.1.2 Regulatory Setting

- **The following text was added to Section 3, 10.1.2 Regulatory Setting, under Ventura County El Rio / Del Norte Area Plan, in response to comment letter 5.**

Ventura County El Rio / Del Norte Area Plan

The El Rio/Del Norte Area Plan functions as the land use plan for approximately 6,984 acres of unincorporated land adjacent to the City of Oxnard and within the City of Oxnard Sphere of Influence. In general, the purpose of the Area Plan is to specify the distribution, location, types, and intensity of land uses within a prescribed area as well as provide specific policies concerning development in that area (Ventura County 2011b). The measures applicable to water quantity contained within the Area Plan are as follows:

- ***Goal 1.2.1*** *Protect the Oxnard Forebay Basin and its recharge area within the El Rio/Del Norte area in order to protect groundwater resources.*

Policies:

- *1. In order to protect groundwater quantity, discretionary development shall not result in any net decrease in the quantity of groundwater, taking into account existing and projected water supply and demand factors (e.g., potable water demand, landscape irrigation, evapotranspiration, recharge). Discretionary development may utilize water offsets (e.g., plumbing fixture retrofits in existing structures) to achieve no decrease in the quantity of groundwater.*

1. *Discretionary development that would individually or cumulatively result in a significant adverse impact on groundwater quality shall be prohibited.*
2. *Discretionary development shall comply with all applicable NPDES (National Pollution Discharge Elimination System) standards to protect surface water quality.*
3. *Discretionary development that would significantly decrease the recharge capability of the property shall be prohibited.*

Ventura County Ordinance 4468 (Well Abandonment)

Ordinance 4468 provides for the protection of groundwater quality and supply and quantity by regulating the construction, maintenance, operation, use, repair, modification, and destruction of wells and engineering test holes in such a manner that the groundwater of the County will not be contaminated or polluted, and that water obtained

from wells well be suitable for beneficial use and will not jeopardize the health, safety, or welfare of the people of Ventura County.

Section 3.10.2.3 Project Impacts

- **The following text was added to Section 3.10.2.3 Project Impacts, under Wastewater paragraph one in response to comment letters 4 and 6.**

The City of Oxnard provides existing wastewater service to RDV through an extension of the sewer main in Rose Avenue to the existing project Site. The 11.1-acre southern campus expansion area is currently served by a residential septic system and does not contribute to the wastewater system. Sewer service is proposed to be provided to the southern campus expansion area *as part of Phase I construction* via a new connection to the City of Oxnard sewer main, separate from the existing main campus sewer.

Section 3.10.2.3 Project Impacts

- **The following changes were made to Section 3.10.2.3 Project Impacts, under Potable Water Sources, in response to comment letters 4 and 6.**

The proposed project will increase the school's water demands. The new 10-acre northern campus expansion area will require irrigation water for crops. Using the FCGMA Crop Year Irrigation Allowance Table, and assuming the crops are avocados with 20-70% ground shading, typical precipitation, the farm will require 2.0 acre-feet/acre. Given the farm is 10 acres, this results in 20 AFY demand for the northern campus expansion area. The southern campus expansion area *~~will increase~~ developed in Phase I of the project will increase the* number of classrooms and add *~~a~~ parking for the 17 existing District buses and optional ~~buses~~ bus wash.* Additionally, the proposed project plans to replace all existing and new sports fields with "xeriscape" (i.e., landscape requiring very little to no irrigation), resulting in a net decrease in landscaping water demand. Jensen calculated the ratio between the existing and proposed areas to determine the projected water demand. They found RSD will have a net surplus of *~~17.701~~ 10.729 AFY* of water allocations with the proposed project (Jensen 2022b). Additionally, the City requires selected new development projects to design and construct dual piping systems within their project areas to facilitate the delivery of recycled water for non-potable uses, such as irrigation of landscaping and athletic fields. Infiltration of water used for irrigation or other outdoor uses and stored in the infiltration basin would contribute to recharge of the underlying basin. A portion of the proposed project's wastewater will be treated at the publicly owned treatment works (POTW), treated at the Advanced Water Purification Facility (AWPF), and injected into the groundwater basin. Therefore, operation of the proposed project would not substantially deplete groundwater or interfere with groundwater recharge such that there would be net deficit in aquifer volume or a lowering of the local groundwater table level. Operational impacts related to groundwater supplies would be less than significant and no mitigation is required.

Section 3.10.2.3 Project Impacts

- **The following revision was made to Section 3.10.2.3 Project Impacts, under Tsunami and Seiche Hazard to reflect new water calculations.**

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

The Oxnard Plain Basin is the primary source of groundwater supplying Oxnard's service area. The FCGMA allocates and limits groundwater extraction volumes to address overdraft and to bring the basins to "safe yield" (when groundwater extraction from a basin are approximately equal to annual replenishments of water into the groundwater basin; the safe yield estimate for the FCGMA area is approximately 120,000 AFY), mostly to halt groundwater intrusion (WSC 2021). The FCGMA SGMP addresses the long-term sustainability of the basin for

municipal and agricultural pumpers. The SGMP contains historical data, groundwater levels, groundwater quality, subsidence, groundwater-surface water interaction, historical and projected demands and supplies, recharge areas, measurable objectives, interim five-year milestones, a sustainability goal, and a plan to achieve the goal in 20 years, with a 50-year planning and implementation horizon. Although the proposed project will increase water demand, the FCGMA water allocations are sufficient to provide this supply and will have a net surplus of ~~*17.701*~~ *10.729* AFY (Jensen 2022b). Therefore, the proposed project is not expected to conflict with the SGMP and project impacts to the SGMP will be less than significant.

Section 3.11.1.1 Existing Setting

- **The following changes were made to Section 3.11.1.1. Existing Conditions, in response to comment letters 5 and 6. Changes clarify land use designations.**

The existing main campus has a Ventura County General Plan land use *designation of Very Low Density Residential (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Institutional with a 10-acre minimum lot size (Ventura County 2020a: Figure 1b), and* ~~a~~ zoning designation of RE-20,000 SF. *The* ~~the~~ northern campus *expansion area* and *the* southern *campus* expansion area~~s~~ have a Ventura County General Plan land use *designation of Agricultural (Ventura County 2020c: Figure 2-5), a El Rio/Del Norte Area Plan land use designation of Agricultural with a 40-acre minimum lot size (Ventura County 2020a: Figure 1b), and* ~~a~~ zoning designation of AE-40 ac/MRP. The City of Oxnard General Plan land use designation for the existing campus is School; the designation for the northern campus *expansion area* and southern *campus* expansion area is Agriculture.

Section 3.11.2.1 Methodology

- **The following changes were made to Table 3-17. Land Use Project Impacts in response to comment letters 5 and 6 to clarify project site land use and planning.**

Table 3-17. Land Use Project Impacts

Project Attribute	Parcel			Approvals Required	Land Use Impact Analysis Sub-Section
	Existing Main Campus (144-0-110-445)	Northern Campus Expansion Area (144-0-110-225 [Portion])	Southern Campus Expansion Area (144-0-110-590 [Portion])		
Jurisdiction	Current: Ventura County Proposed: City of Oxnard	Current: Ventura County Proposed: City of Oxnard	Current: Ventura County Proposed: City of Oxnard	City of Oxnard Ventura LAFCo	LAFCo Actions
Ventura County General Plan Land Use Designation	Current: *Very Low Density Residential* ~~*RE 20,000 SF*~~ Proposed: N/A	Current: *Agricultural* ~~*AE 40 ac/MRP*~~ Proposed: N/A	Current: *Agricultural* ~~*AE 40 ac/MRP*~~ Proposed: N/A	N/A	
El Rio/Del Norte Area Plan Land Use Designation	*Current: Institutional with a 10-acre minimum lot size* *Proposed: N/A*	*Current: Agricultural with a 40-acre minimum lot size* *Proposed: N/A*	*Current: Agricultural with a 40-acre minimum lot size* *Proposed: N/A*	*N/A*	
City of Oxnard General Plan Land Use Designation	Current: School Proposed: ~~*School*~~ *Public/Semi-Public*	Current: Agriculture Proposed: ~~*School*~~ *Public/Semi-Public*	Current: Agriculture Proposed: ~~*School*~~ *Public/Semi-Public*	City of Oxnard	City of Oxnard 2030 General Plan and Zoning
Zoning Designation	Current (Ventura County): RE-20,000 S.F. Proposed (City of Oxnard): Community Reserve (C-R)	Current (Ventura County): AE-40 ac/MRP Proposed (City of Oxnard): C-R	Current (Ventura County): AE-40 ac/MRP Proposed (City of Oxnard): C-R	City of Oxnard	
Oxnard-Camarillo Greenbelt	Current: Outside Proposed: Outside	Current: Within Proposed: Outside	Current: Within Proposed: Outside	City of Camarillo, City of Oxnard, County of Ventura	Oxnard-Camarillo Greenbelt Agreement Map Amendment

Project Attribute	Parcel			Approvals Required	Land Use Impact Analysis Sub-Section
	Existing Main Campus (144-0-110-445)	Northern Campus Expansion Area (144-0-110-225 [Portion])	Southern Campus Expansion Area (144-0-110-590 [Portion])		
Water District	Current: On-Site well United Water Conservation District City of Oxnard Proposed: Calleguas Municipal Water District	Current: Agricultural Well Water Proposed: Calleguas Municipal Water District	Current: Agricultural Well Water Proposed: Calleguas Municipal Water District	Annexation Request to: Calleguas Municipal Water District, Ventura LAFCo	LAFCo Actions
City of Oxnard Sphere of Influence (SOI)	Current: Within Proposed: Within	Current: Outside Proposed: Within	Current: Outside Proposed: Within	Ventura LAFCo	LAFCo Actions
City of Oxnard City Urban Growth Boundary (CURB)	Current: Within Proposed: Within	Current: Outside Proposed: Within	Current: Outside Proposed: Within	City of Oxnard, Ventura LAFCo	LAFCo Actions
City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinance	Current: N/A Proposed: Outside	Current: N/A Proposed: Outside	Current: N/A Proposed: Outside	Exempt	County of Ventura and City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinances
County of Ventura SOAR Ordinance	Current: Outside Proposed: N/A	Current: Within Proposed: N/A	Current: Within Proposed: N/A	N/A	

Notes: LAFCo Local Agency Formation Commission
N/A Not Applicable

Section 3.11.2.3 Project Impacts

- **The following revision was made to Section 3.11.2.3 Project Impacts, under City of Oxnard 2030 General Plan and Zoning, paragraph two. The revision was made in response to comment letters 5 and 6, to clarify proposed land use designations, as follows.**

The RSD would process a GPA, RZ, and a Reorganization and SOI amendments through the City of Oxnard. The proposed General Plan land use designation is ~~*School*~~Public/Semi-Public, and the proposed zoning designation is Community Reserve (C-R). Schools are an allowed use within the C-R zone with approval of the special use permit (Oxnard Municipal Code Section 16-257). With the approval of the GPA, Pre-Zone, and Annexation, the proposed project would be consistent with the General Plan and zoning land use designations.

Section 3.11.2.3 Project Impacts

- **The following revision was made to Section 3.11.2.3 Project Impacts, under County of Ventura and City of Oxnard Save Open Space and Agricultural Resources (SOAR) Ordinances, paragraph two. The revision was made in response to comment letters 6, to clarify the discretionary role of the City of Oxnard in exempting the project from SOAR, as follows.**

However, the determination of the SOAR exemption noted above is to be made by the City of Oxnard City Council.

Section 3.16.1.1 Existing Conditions

- **The following changes were made to Table 3-26 Existing a.m. and p.m. Peak Hour Intersection Levels of Service.**

Table 3-26. Existing a.m. and p.m. Peak Hour Intersection Levels of Service

Intersection	Jurisdiction	Control	a.m. Peak Hour V/C – LOS	p.m. Peak Hour V/C – LOS
1. Rose Ave/Central Ave	County	Signal	0.64/LOS B	0.55/LOS A
2. Rose Ave/Simon Wy	County	Signal	0.37/LOS A	0.32/LOS A
3. Rose Ave/Walnut Dr	County	Signal	0.43/LOS A	0.28/LOS A
4. Rose Ave/Orange Dr [1]	County	One-way stop	19.3 sec/LOS C	12.1 sec/LOS B
5. Rose Ave/Collins St	~~*Oxnard*~~ *County*	Signal	0.44/LOS A	0.40/LOS A
6. Rose Ave/Stroube St [1]	Oxnard	One-way stop	18.9 sec/LOS C	13.7 sec/LOS B
7. Rose Ave/Ventura Blvd-Auto Center Dr	Oxnard	Signal	0.50/LOS A	0.63/LOS B
8. Auto Center Dr/Collins St [1]	Oxnard	One-way stop	13.8 sec/LOS B	*28.4 sec/LOS D*
9. Santa Clara Ave/Ventura Blvd	Oxnard	Signal	0.31/LOS A	0.34/LOS A

Notes: [1] Unsignalized intersection: level of service based on seconds of delay on minor street

Table 3-25 indicates that the four-lane segment of Rose Avenue between Walnut Drive and Central Avenue operates in the LOS A range. Table 3-26 indicates that the study-area intersections operate in the LOS A-C range except the Auto Center Drive/Collins Street intersection, which operates at LOS D, which is below the City of Oxnard LOS C standard.

Section 3.16.2.1 Methodology

- **The following changes were made in Section 3.16.2.1, under Traffic Analysis Scenarios in response to comment letters 1, 5 and 6. Revisions clarify traffic analysis as follows.**

The proposed project is located in Ventura County. Traffic analysis scenarios were coordinated with County and City of Oxnard staff. Pursuant to County of Ventura traffic study requirements, the traffic analysis includes the following traffic scenarios:

~~*Pursuant to County of Ventura and City of Oxnard traffic study requirements, the traffic analysis includes the following traffic scenarios:*~~

Section 3.16.2.3 Project Impacts

- **The following changes were made in Section 3.16.2.3, under District Transportation and Parking Facility in response to comment letters 1, 5 and 6.**

District Transportation and Parking Facility. The project also includes the relocation of the DTPF from E. Vineyard Avenue to N. Rose Avenue. While the relocation would not add traffic to the regional roadway network, it would divert bus and employee trips to the immediate vicinity of the middle school site and its driveways. The DTPF operational statistics provided by RSD are as follows:

- 17 school buses in service *(13 buses for routes and 4 spare buses)*. All buses will be parked at the DTPF.

Section 3.16.2.3 Project Impacts

- **The following changes were made to Table 3-31 Existing + Project a.m. and p.m. Peak Hour Intersection Levels of Service, in response to comment letters 1, 5 and 6.**

Table 3-31. Existing + Project a.m. and p.m. Peak Hour Intersection Levels of Service

Intersection	Jurisdiction	Control	a.m. Peak Hour V/C - LOS	p.m. Peak Hour V/C - LOS
1. Rose Ave/Central Ave	County	Signal	0.64/LOS B	0.55/LOS A
2. Rose Ave/Simon Wy	County	Signal	0.38/LOS A	0.32/LOS A
3. Rose Ave/Walnut Dr	County	Signal	0.43/LOS A	0.28/LOS A
4. Rose Ave/Orange Dr [1]	County	One-way stop	19.5 sec/LOS C	13.1 sec/LOS B
5. Rose Ave/Collins St	~~*Oxnard*~~ *County*	Signal	0.44/LOS A	0.40/LOS A
6. Rose Ave/Stroube St [1]	Oxnard	One-way stop	22.9 sec/LOS C	14.3 sec/LOS B
7. Rose Ave/Ventura Blvd-Auto Center Dr	Oxnard	Signal	0.52/LOS A	0.63/LOS A
8. Auto Center Dr/Collins St [1]	Oxnard	One-way stop	14.9 sec/LOS B	*31.6 sec/LOS D*
9. Santa Clara Ave/Ventura Blvd	Oxnard	Signal	0.32/LOS A	0.34/LOS A

Notes: [1] Unsignalized intersection: level of service based on seconds of delay on minor street.

Section 3.16.2.3 Project Impacts

- **The following changes were made to Section 3.16.2.3 under Project Site Access and Circulation in response to comment letters 1, 5 and 6.**

As illustrated in Exhibit 2, access to the school student drop-off/pick-up loop on Rose Avenue will be provided via the existing ingress only driveway on Rose Avenue opposite Orange Drive and the existing egress only driveway on Rose Avenue opposite Walnut Drive. A new right-turn only driveway located south of Orange Drive will provide access to parking lot "A". Two driveways located on Rose Avenue north of Walnut Drive will provide access to parking lot "B". Two new driveways are proposed on Collins Drive. The driveways provide access to parking lot "A", the school bus drop-off/pick-up lane and the DTPF.

~~*As illustrated in Exhibit 2, access to the school student drop-off/pick-up loop on Rose Avenue will be provided via the existing ingress only driveway on Rose Avenue opposite Orange Drive and the existing egress only driveway on Rose Avenue opposite Walnut Drive. A new right-turn only driveway located south of Orange Drive will provide access to Parking Lot A. Two driveways located on Rose Avenue north of Walnut Drive will provide access to Parking Lot B. Two new driveways are proposed on Collins Drive. The driveways provide access to Parking Lot A, the school bus drop-off/pick-up lane and the DTPF.*~~

Field review of school traffic during the morning commute period indicated that the existing drop-off loop system with ingress from the Rose Ave/Orange Drive intersection backs up during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area.

~~*Field review of school traffic during the morning commute period indicated that the existing drop-off loop system with ingress from the Rose Ave/Orange Dr intersection backs up during brief periods, and student drop-offs occur along the northbound shoulder of Rose Avenue south of the existing school boundary. Congestion occurs during the period prior to start of bell schedule and is associated with peak drop-off traffic and arrival of school buses, which use the same drop-off area.*~~

The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Ave/Collins St intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF.

~~*The existing drop-off/pick-up loop system will be expanded to increase vehicle stacking capacity and school bus drop-off/pick-up traffic will be diverted to the new driveways on Collins Street. The construction of a full-access driveway on Collins Street, a separate school bus drop-off area and additional parking areas will improve access and on-site circulation for the middle school. School buses will now enter and exit via Collins Street with minimal delay or conflict with other vehicles. The signalized Rose Avenue/Collins Street intersection provides sufficient capacity to accommodate school bus traffic. The driveway on Collins Street will also provide additional access for Parking Lot A and the DTPF.*~~

It is recommended that the RSD develop a school traffic management plan (TMP) to document and implement measures to promote travel mode shifts, optimize on-site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed humps).

~~*It is recommended that RSD develop a school traffic management plan (TMP) to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps).*~~

A continuous sidewalk is provided along the east side of Rose Avenue from Auto Center Drive to the middle school that connects to the school's internal pedestrian facilities. Crosswalks are provided at the signalized intersections at Collins Street and Walnut Drive. As discussed, the County's 2023-2027 CIP includes several projects in de El Rio neighborhood that will improve pedestrian and bicycle access to the middle school. The RDV SRTS assessment identified locations for construction of (infill) sidewalks, intersection curb extensions and traffic calming measures along students walking corridors to promote walking to school. A new sidewalk will be constructed along the project frontage on Collins Street that connects to an ADA pedestrian sidewalk system on the school site.

~~*A continuous sidewalk is provided along the east side of Rose Avenue from Auto Center Drive to the middle school that connects to the school's internal pedestrian facilities. Crosswalks are provided at the signalized intersections at Collins Street and Walnut Drive. As discussed, the County's 2023-2027 CIP includes several projects in the El Rio neighborhood that will improve pedestrian and bicycle access to the middle school. The Rio Del Valle SRTS assessment identified locations for construction of (infill) sidewalks, intersection curb extensions and traffic calming measures along students walking corridors to promote walking to school. A new sidewalk will be constructed along the project frontage on Collins Street that connects to an ADA pedestrian sidewalk system on the project Site.*~~

The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. The project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. The SRTS improvement exhibit and Rose Avenue Bike Lanes project exhibits are included in Appendix 3 of the TCS.

~~*The Rose Avenue Bike Lanes project will provide Class II (on-street striped) bike lanes on Rose Avenue from Collins Street to Simon Way. The project will provide a continuous bike lane from Ventura Boulevard to Simon Way in the northbound direction and from Simon Way to Collins Street in the southbound direction. The SRTS improvement exhibit and Rose Avenue Bike Lanes project exhibits are included in Appendix 3 of the TCS.*~~

Section 3.16.2.3 Project Impacts

- **The following changes were made to Section 3.16.2.3 under School Bus Transportation, in response to comment letter 6.**

The proposed project includes the relocation of the DTPF from E. Vineyard Avenue to N. Rose Avenue. While the relocation would not add traffic to the regional roadway network, it would divert bus and employee trips to the immediate vicinity of the Site and its driveways. The DTPF operational statistics provided by RSD are as follows:

- 17 school buses in service (13 buses for routes and 4 spare buses). All buses will be parked at the facility.

Section 3.16.2.3 Project Impacts

- **The following changes were made to Section 3.16.2.3 under Improvement Measures in response to comment letters 1, 5 and 6.**

The project-specific analysis found that the project may contribute to the delays experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. *Review of collision data provided by the City (included in Appendix 7 of the TCS) indicates that the collision history does not satisfy Traffic Signal Warrant 7 – Crash Experience Warrant (2014 CAMUTCD, Rev 6) of 5 or more crashes reported in a 12-month period that are susceptible to correction by a traffic signal. In addition, the* ~~*The*~~ low side street volumes (76 peak hour trips in the p.m. peak hour) and delays would not satisfy any traffic signal warrants. The southbound approach is controlled by a stop sign and contains a shared left-right-turn lane. Prohibiting parking along the west curb

extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole; however, the southbound approach would continue to operate at LOS D. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. Table 3-34 shows the mitigated intersection levels of service.

Section 3.18.1.1 Existing Conditions

- **The following changes were made to Section 3.18.1.1 Existing Conditions. Changes reflect revisions to Appendix H, Water Resources Systems Reports.**

The El Rio Elementary School site has been sold by the RSD. A mixed-use development on the former school site has been approved by the Oxnard City Council. As such, the 40.399 AFY of groundwater pumping allocation for the on-Site well is in the process of being transferred to the new owner. Following this transfer, the RSD will have 11.675 AFY of water allocations remaining for the two wells located at Rio Real School and RDV Middle School. ~~*54.6*~~ *47.628* AFY of FCGMA water allocations are to be transferred to RSD with the newly acquired land to the north (northern campus expansion area) and south of the existing RDV Middle School campus (southern campus expansion area). The water transfer amount has yet to be finalized in a formal written agreement with the sellers of both parcels. With this transfer, the RSD will have a total of ~~*66.275*~~ *59.303* AFY of FCGMA water allocations.

Section 3.18.2.3 Project Impacts

- **The following changes were made to Section 3.18.2.3 under Project Impacts, paragraph three in response to comment letter 6.**

The DTPF relocated to the southern campus expansion area as part of the proposed project will consist of a 7,500 sq. ft. maintenance building, two 1,080 sq. ft. portable buildings, 528 sq. ft. restroom, and conversion of the approximately 3,130 sq. ft. existing residential structure located on the project Site to office use by RSD Maintenance and Operations staff. The southern campus expansion area ~~*will*~~ *may include an optional* ~~*a*~~ *bus washing facility.* Projected water demand for the proposed *optional* bus wash located on the southern parcel *is* ~~*are*~~ shown in Table 3-38. ~~Assuming a quantity of 24 buses washed at a frequency of one wash per bus per week with a flow rate of 250 gallons per minute (gpm) at the washing facility for a period of 5 minutes per wash, an estimated 4.787 AFY would be used.~~

Section 3.18.2.3 Project Impacts

- **The following changes were made to Section 3.18.2.3 under Project Impacts, paragraph six, in response to comment letter 6. Changes include additional information about the bus wash.**

Table 3-39 provides full build-out water consumption projections of all proposed uses (Buildings, Landscaping, ~~and~~ Agricultural Use and *optional Bus Wash*). Total RSD water demand is estimated at 48.574 AFY. FCGMA water allocations, including existing allocations and water that will be transferred to RSD with the newly acquired land, would result in a total of *59.303* ~~*66.275*~~ AFY. With the total water allocations associated with the proposed project campus expansion, *including the optional Bus Wash, RSD* would have a net surplus of ~~*17.701*~~ *10.729* AFY.

Section 3.18.2.3 Project Impacts

- **The following changes were made to Table 3-39.**

Table 3-39. Rio School District Water Demands and Allocations

Water Demand	Quantity (AFY)	Water Source	Reference
Rio Real School (Landscaping)	14.26	FCGMA	See Table 3-23
Rio Del Valle – Full Build-out, Buildings	4.873	United Water	See Table 3-25
Rio Del Valle – Full Build-out, Landscaping	4.654	FCGMA	See Table 3-25
Rio Del Valle – Farm/Agricultural Learning	20	FCGMA	FCGMA Crop Irrigation Table
Rio Del Valle – Bus Wash	4.787	FCGMA	See Table 3-~~26~~*38*
Total RSD Water Demand	**48.574**		
FCGMA Water Allocations (AFY)			
RSD Existing FCGMA Allocations	11.675[1]		
Water Allocations Acquired from Expansion Areas	~~*54.6*~~47.628		
Total FCGMA Water Allocations	~~***66.275***~~***59.303***		
Net Proposed Project Water Demand:	~~***-17.701***~~***10.729***		

Source: Jensen 2022b

Notes:

[1] Total water allocations remaining for the two wells located at Rio Real School and RDV Middle School.

Section 3.18.2.3 Project Impacts

- **The following minor revision was made to Section 3.18.2.3 under Project Impacts, paragraph nine.**

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

The proposed project will connect to the existing 8-inch Southern California Gas main line currently serving the existing middle school. Natural gas will be used to power various assets including appliances, such as stoves and ovens, and equipment such as water heaters, boilers, and classroom heaters (furnaces). The proposed project is planned to connect to existing utility lines and local telecommunication providers and is not anticipated to require the construction or relocation of electric power, natural gas, or telecommunication facilities. The project Site area is adjacent to existing service infrastructure and will make any required upgrades to connect to existing utility lines and providers. Utility providers within the City are included on the distribution list for the environmental documents pertaining to the proposed project (including the IS). Therefore, project impact would be less than significant.

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

As discussed above and shown in Table 3-39, the combined water demand for the RSD, including the Rio Real School landscaping, full build-out of RDV, including landscaping and buildings, the proposed northern campus expansion area, and the southern campus expansion area optional bus wash, would be 48.754 AFY. With existing and acquired allocations from the northern and southern campus expansion areas, total water allocations are *59.303* *66.275* AFY, representing a *10.729* *17.701* AFY surplus. Even with scheduled cutbacks in supply and

extractions by the City and the various water agencies, the proposed project is anticipated to have sufficient water supplies for the reasonably foreseeable future. Further, as described above, the City anticipates that the AWPF will provide up to 11,900 AFY of recycled water for IPR. The recently announced $48 million WIFIA EPA loan will support the City's Aquifer Storage Recovery Project which will help to expand the City's recycled water supply. These programs will supplement the already substantial water supply allocation of the proposed project. Therefore, project impacts to water supply would be less than significant.

Section 3.18.2.3 Project Impacts

- **The following changes were made to Section 3.18.2.3 under Project Impacts, paragraph 14 in response to comment letter 4 to clarify wash water restoration systems.**

The bus wash wastewater will be recycled using a Wash Water Restoration System, or similar equipment. This system will recycle and reuse water with an expected maximum waste stream of 25% of used water. ~~*It is estimated that 25% of bus wash water demand will discharge to the City's sewer system. Although RSD will be required to recycle wash water, some wastewater is expected from maintenance activities such as back flushing filters. Based on these assumptions, project-generated wastewater production is estimated at 5.339 AFY, or 4,766 gpd (Jensen 2022c).*~~

Section 3.18.2.3 Project Impacts

- **The following changes were made to Section 3.18.2.3 under Project Impacts, paragraph 16 and 17, in response to comment letter 4 and 6.**

The increase in sewer flow due to the proposed project was analyzed to show its *downstream* impact on ~~*existing infrastructure*~~ *the City's collection system*. It was assumed that the sewer main ~~*is*~~ *will be* at the maximum acceptable depth/diameter ratio for peak flows ~~*in the existing condition*~~ *when it reaches its projected ultimate demand* The increase in sewer flow created by the proposed project was ~~*compared*~~ *added* to the assumed ~~*existing condition*~~ *ultimate demand* flowrate. Pipe capacity analysis results are included in Appendix 5.4 of the Sewer Preliminary Investigation (Jensen 2022c). Table 3-41 summarizes these pipe capacity analysis results.

The increased flows do not produce a measurable increase in maximum flow depth. Therefore, the d/D ratio will not increase during peak wet weather flows, even if the ~~*existing*~~ *ultimate demand* condition is already at the maximum d/D ratio.

Section 3.18.2.4 Cumulative Impacts

- **The following changes were made to Section 3.18.2.4, to update projected water demand.**

The General Plan considers probable future projects, each of which would have to undergo the CEQA process individually. The buildout of the proposed project must consider the demand of the proposed project within the CEQA process. The City of Oxnard UWMP is based on 2030 General Plan buildout, and therefore addresses cumulative impacts in nature. Additionally, the proposed project and all future development projects in the City will be required to comply with standard water conservation requirements of the City, State, and California Building Code. These include the use of low-flush toilets and urinals, compliance with statewide efficiency standards for shower heads and faucets, and insulation of pipes to reduce water used before hot water reaches equipment or fixtures. Given the proposed project's excess water supply allocation of ~~*17.701*~~ *10.729* AFY over estimated project demand and therefore compliance with water neutrality as required by the City, the increase of demand on the City water supply will be mitigated. Storm water drainage, electric power, natural gas, and telecommunications facilities are proposed to connect to already existing systems and service providers. Solid waste disposal will be provided by existing carriers. Solid waste generation represents a very small fraction of overall City permitted landfill and recycling facility capacity, and the proposed project would not result in a significant cumulative impact to waste

disposal facilities. Per CALGreen requirements, a minimum of 65% of nonhazardous construction and demolition waste will be recycled and/or salvaged for reuse. The proposed project is designed to include energy saving features such as ultra-high efficiency rooftop packaged units, demand control ventilation, solar panels, and an energy management system that will provide scheduled times of operation as well as temperature-setback when classrooms are unoccupied. The electrical systems will include energy-efficient LED lighting fixtures in the interior and exterior of the buildings with low voltage controls to include dimming, daylight sensors and automatic occupancy sensing devices. The project Site parking lots and pathway pole-mounted lighting and sports field and court lighting will have energy-efficient LED lamps and drivers with low voltage controls. The electrical power transformer specified for the proposed project will be an energy-efficient type complying with the most recent energy code. Therefore, cumulative impacts of the proposed project on utilities and service systems would be less than significant.

3.2.5 Changes and Errata to Section 4.0 Other CEQA Considerations

Section 4.3 Significant Unavoidable Impacts

- **The following revision was made to Section 4.3 after Agriculture (Converting Farmland of Statewide Importance to Non-Agricultural Use), in response to comment letters 5 and 6. The revision changes the proposed land use designations, as follows.**

The RSD is requesting annexation of the proposed project Site into the City of Oxnard. In addition to the annexation request, concurrent entitlements from the City of Oxnard may include a General Plan Amendment and Zoning/Pre-Zoning Requests. It is anticipated that the Site will obtain a General Plan designation of ~~*School (SCH)*~~*Public/Semi-Public* and a zoning designation of C-R.

3.2.6 Changes and Errata to Section 5.0 Alternatives

Section 5.3.2 Limited Expansion of Existing Middle Schools Alternative A

- **The following was added to Section 5.3.2 after paragraph 3, in response to comment letters 5 and 6. The additional text clarifies and provides more information on the approach to the selection of alternatives for analysis.**

RSD also studied several potential middle school sites and other alternatives and determined the proposed project Site to be the one that is best available, and the only one that would accommodate all of the improvements to the RDV campus as well as the transportation and parking components. These alternative sites included the following:

- *Existing nine RSD campuses including RDV;*
- *Beedy Street property (located near intersection of Beedy Street and E. Vineyard Avenue in Oxnard, CA);*
- *Santa Clara Parish Chapel Vacant Land (1333 Ventura Boulevard Oxnard, CA 93036);*
- *RSD-owned property adjacent to fire station cul-de-sac [property located near 3300 Turnout Park Circle Oxnard, CA 93036 (Oxnard Fire Department Station 7]); and*
- *City Old and New Transportation Yard property located near 201 E. Fourth Street Oxnard, CA 93030); and.*
- *Miscellaneous properties listed for sale in Oxnard and Ventura County.*

One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically

unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost effective and District-wide individual school attendance boundary adjustments will be made as needed in the future. These alternative sites would not meet two of the Project Objectives of providing new facilities that meet the RSD's educational specifications and building school facilities that reflect the wise and efficient use of limited land resources. Therefore, alternative site locations were considered but rejected by RSD.

RSD studied two alternative sites for the proposed bus transportation facility. The first site is a 1-acre parcel owned by RSD (property located near 3300 Turnout Park Circle Oxnard, CA 93036 (Oxnard Fire Department Station 7)) and leased to the City of Oxnard (50-year lease) for storage of maintenance equipment. This site was eliminated because RSD could not reach an agreement with the City for required site improvements to park the school buses at this site. The other site was a bus parking facility located at the Oxnard School District Transportation Center (near 516 W. Wooley Road). This site was eliminated because RSD could only negotiate a 1-year lease agreement with Oxnard School District so this site would just be a temporary bus parking facility.

~~*RSD studied several potential middle school sites and other alternatives and determined that the proposed project Site to be the one that is best available. One of the six sites identified in the Oxnard General Plan for future school sites is currently being constructed as Del Sol High School (Oxnard Union High School District); the other five sites were determined demographically unacceptable for the proposed project, as they are outside of the current RSD attendance boundary, would create additional traffic impacts due to added vehicle and bus trips and increased travel time, and are not affordable to the RSD at this time. Additionally, expansion of the existing RDV Site is most cost effective, and District-wide individual school attendance boundary adjustments will be made as needed in the future. These alternatives would not meet two of the Project Objectives of providing new facilities that meet the RSD's educational specifications and building school facilities that reflect the wise and efficient use of limited land resources. Therefore, alternative site locations were considered but rejected.*~~

Section 5.3.3.2 Limited Expansion of Existing Middle Schools Alternative A

- **The following were minor revisions or changes made to Section 5.3.3.2 under Noise, to reflect changes made throughout the document.**

The expansion improvements would occur on two existing middle school sites and noise and ~~*groundborne*~~ *ground borne* vibration generated by expansion construction would be less than the proposed project but would occur at two locations. If construction takes place during the school year, noise levels could be disruptive to student and faculty populations at the existing middle school facilities. Mitigation in conformance with Mitigation Measure N-1 would be required to reduce these impacts to less than significant.

During operation, traffic levels would increase at the two middle schools in relation to increased enrollment. However, none of the attendant facilities, such as sports fields and courts, library, bus ~~*washing*~~ *parking lot facility* and parking lots, would be constructed. These would all be sources of operational noise. Similar to the proposed project, the associated increases in ADT would likely represent an increase of less than 1 dBA at the residences adjacent to the existing middle schools and would have minimal impact on traffic noise conditions. As these are existing middle schools, noise from rooftop mechanical equipment would not be expected to change significantly and would be less than the proposed project. Operational noise impacts would be less than significant. Impacts would be less in comparison to the proposed project.

Section 5.3.4 Environmentally Superior Alternative

- **A revision was made to the Summary of Project Alternatives Table 5-1. The revision shows that potential impacts are reduced through implementation of mitigation measures for the Hazards and Hazardous Materials Issue Area.**

Table 5-1. Summary of Project Alternatives

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

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

3.2.7 Changes and Revisions to Technical Reports and Appendices

Appendix B: Air Quality Reports (Volume II Appendices)

- **The Air Quality Report CalEEMod calculations were recalculated, and the report revised in response to comment letters 2, 5 and 6.**

Appendix H: Water Demand Allocations Technical Memorandum (Volume II Appendices)

- **The Water Demand Allocations Technical Memorandum was revised in response to comment letters 4 and 6.**

Appendix H: Sewer Preliminary Investigation Study (Volume II Appendices)

- **The Sewer Preliminary Investigation Study was revised in response to comment letters 4 and 6.**

Appendix I: Traffic and Circulation Study (Volume II Appendices)

- **The Traffic and Circulation Study was revised in response to comment letters 1, 5 and 6.**

APPENDICES

APPENDIX A: MITIGATION MONITORING AND REPORTING PROGRAM

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

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
Agriculture and Forestry Resources						
AG-1	The District shall offer at cost the top 12 inches of the Prime Farmland and Farmland of Statewide importance soils from the southern campus expansion area for relocation to a farm site or farm sites that have lower quality soils. The cost will include suitable replacement soil, if needed for Site improvements. for Site improvements.	Prior To Construction	RSD			
AG-2	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.	Prior To Construction and For a Minimum of 10 years	RSD			
Air Quality						
AQ-1	In accordance with standard practice pursuant to the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations during project construction the contractor shall ensure that:	During Construction	RSD (Contractor)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	• All soil excavated or graded shall be sufficiently watered to prevent excessive dust. Watering shall occur as needed with complete coverage of disturbed soil areas. Watering shall be a minimum of twice daily on unpaved/untreated roads and on disturbed soil areas with active operations. • All clearing, earth moving, and excavation activities shall cease during periods of winds greater than 20 miles per hour (mph) (averaged over one hour), if disturbed material is easily windblown, or when dust plumes of 20% or greater opacity impact public roads, occupied structures, or neighboring property. • All fine material transported off-Site shall be either sufficiently watered or securely covered to prevent excessive dust. • All haul trucks shall be required to exit the Site via an access point where a gravel pad or grizzly has been installed. • Stockpiles of soil or other fine loose material shall be stabilized by watering or other appropriate method to prevent wind-blown fugitive dust.					

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	• Once initial leveling has ceased, all inactive soil areas within the construction Site shall either be seeded and watered until plant growth is evident, treated with a dust palliative, or watered twice daily until soil has sufficiently crusted to prevent fugitive dust emission. • On-Site vehicle speed should be limited to 15 mph. • All areas with vehicle traffic should be paved, treated with dust palliatives or watered a minimum of twice daily. • Properly maintain and tune all internal combustion engine powered equipment. • Require employees and subcontractors to comply with the CARB idling restrictions for compression ignition engines; and use California ultra-low sulfur diesel fuel; use construction equipment with Tier 4 engines; and use interior and exterior paint with a VOC content of 50 grams per liter.					
Biological Resources						
BIO-1	A preconstruction nesting bird survey shall be conducted by a qualified biologist prior to tree removal, the use of heavy machinery, or significant ground disturbance if activities are	Prior To Construction	RSD (Biologist / Contractor)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	to be conducted within the bird nesting season (February 15 – September 15). The survey shall be required within 72 hours prior to the commencement of construction activities if they occur in the bird nesting season. The survey shall occur within the Site and a 250-foot buffer area around the Site, access permitting, which will include any adjacent trees. If construction activity as defined above halts for a period of 7 days or more, the survey will be considered invalid and need to be conducted again prior to the continuation of construction activities. If birds are found to be actively nesting within the project Site or within 250 feet of the work area, an appropriate exclusionary buffer around the active nest shall be established by the qualified biologist. The buffer distance will be determined based on the nesting species. No construction activities would be allowed within the buffer until the birds have fledged from the nest. Active nests and buffers would be monitored as needed by a qualified biologist to determine if active nests are being adversely affected by project activities. At a minimum, a qualified biologist would visit an active nest weekly to determine the status of the nest. Only when the nest becomes inactive (nestlings have fledged) will the buffer and **biological monitoring no longer be needed.**					

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

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	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)			
Cultural Resources						
CUL-1	***Built Environment*:** Prior to construction of the proposed project, the project owner shall retain a Secretary of Interior qualified architectural historian to assess whether the proposed project will have a potential significant impact to the historic era RDV buildings and infrastructure, and the existing residential building at 2600 Rose Avenue, Oxnard, California**.**	Prior To Construction	RSD (Contractor/ Project Architectural Historian)			
CUL-2	**Cultural Resource Worker Environmental Awareness Training:** Prior to any proposed construction ground disturbing activities within the project Site, the RSD Project Manager shall require the construction contractor to provide for all non-cultural resources personnel to be briefed, by a Secretary of Interior qualified project archaeologist (retained on-call by construction contractor) about the potential and procedures for an inadvertent discovery of precontact, tribal, and historic era cultural resources. In addition, the training will	Prior To and During Construction	RSD (Contractor / Project Archaeologist)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	include established procedures for temporarily halting or redirecting work in the event of a discovery, identification and evaluation procedures for finds, and a discussion on the importance of, and the legal basis for, the protection of archaeological resources. Personnel will be given a training brochure/handout regarding identification of cultural resources, protocols for inadvertent discoveries, and contact procedures in the event of a discovery. If requested, a local tribal representative(s) shall be invited to participate in the environmental training to discuss or provide text from a tribal cultural perspective regarding the tribal cultural resources within the region.					
CUL-3	**Inadvertent Discovery Plan:** Prior to any proposed construction ground disturbing activities within the project Site, the District Project Manager shall require the construction contractor to retain a Secretary of Interior qualified archaeologist to prepare an Inadvertent Discovery Plan for the proposed project. The Inadvertent Discovery Plan will provide protocols and notification procedures in the event of an inadvertent discovery. During Project construction (e.g., ground disturbing activities such as vegetation removal, excavation, trenching, grading), should subsurface archaeological	Prior to Construction	RSD (Contractor)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	precontact, tribal, or historic-era cultural resources be discovered, all ground disturbing activities within 50 feet of the find shall cease and the qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the implementing agencies and any local consulting Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Under CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, Project reroute or redesign, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local consulting Native American representatives expressing interest in prehistoric or tribal					

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	resources. If an archaeological site does not qualify as a historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2. Existing regulations require that if human remains and/or cultural items defined by HSC, Section 7050.5, are inadvertently discovered, all work in the vicinity of the find would cease and the Ventura County Medical Examiner (805-641-4400) would be contacted immediately. If the remains are found to be Native American as defined by HSC, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours.					
CUL-4	**Historical Resources Protection.** 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	Prior to Construction	RSD (Contractor/ Project Architectural Historian)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	conditions, agreements, or other measures as per Cal. Code Regs. tit. 14 § 15064.5.					
Geology and Soils						
GEO-1	The building design for structures at the proposed project shall use geotechnical building design recommendations that are in conformance with the 2019 CBC and ASCE 7-16 (ASCE 2017). A site-specific ground motion hazard analysis shall be performed if structures on Site Class D have an S_1 greater than or equal to 0.2 unless the seismic coefficient Cs determined by Equation (12.8-2) is used for values of T <= 1.5 Ts and taken as equal to 1.5 times the value computed in accordance with either Equation (12.8-3) for TL >= T > 1.5 Ts 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.	Prior To Construction	RSD			
GEO-2	An erosion plan shall be developed for proposed project construction activities that includes measures such as the use of hay bales and other erosion control devices as determined by Site-specific conditions, limiting construction to the dry season, and soil wetting, applied as required under applicable regulatory guidelines and standards.	Prior To Construction	RSD (Contractor)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
GEO-3	**Paleontological Resource Impact Mitigation Program.** Prior to any ground-disturbing activities, a Paleontological Resource Impact Mitigation Program (PRIMP) shall be prepared by a qualified paleontologist if proposed project construction will exceed Holocene soils (estimated depth of Holocene soils is at least to 70 feet bgs). A qualified paleontologist shall also attend the worker environmental awareness program training and provide information on paleontological resources and a brochure/handout outlining procedures in the event of a paleontological find during construction. The RSD Project Manager will require the construction contractor to initiate implementation of the PRIMP at the beginning of ground disturbing activities. The PRIMP will address and define the following specific activities and responsibilities: • Full-time monitoring by a qualified paleontologist during all grading and excavation extending more than 10 feet bgs or beyond Holocene deposits. • Spot-check monitoring by a qualified paleontologist for all grading and excavation between 5 and 10 feet bgs to determine whether older sediments with a potential to contain	Prior To and During Construction	RSD (Contractor / Paleontologist)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	paleontological resources are present. • Procedures for proposed project personnel and/or paleontological monitor to halt work and temporarily redirect construction away from an area if paleontological resources are encountered during grading or excavation in order to assess the significance of the find. • Procedures for recommendations regarding level of monitoring effort (e.g., spot check or full-time) depending upon sensitivity of soil depth, identification of finds, etc. • Procedures for handling collected material and curation. • Procedures for reporting and documenting the results of the monitoring program. • Provide brochure of environmental awareness training.					
Hazards and Hazardous Materials						
HAZ-1	The handling of potentially hazardous materials and substances, and generation of hazardous waste at the new DTPF would be performed under federal, state, and local laws and regulations with regulatory oversight, including but not limited to the DTSC, the City of Oxnard, and County of Ventura.	During Construction	RSD			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
HAZ-2	Additional step out sampling should be performed under DTSC regulatory oversight to assess the lateral extent of OCPs in surface soil at concentrations above relevant screening levels at sample locations SS-30, SS-31, SS-32, SS-35, SS-36, and SS-39. The vertical extent of dieldrin in subsurface soil at concentrations above relevant screening levels should be performed at sample location SS-35. Once the extent of OCPs at concentrations above relevant screening levels in soil is defined, a focused housekeeping soil removal action should be performed under DTSC regulatory oversight for the small areas of elevated OCPs and TPHd and TPHm. This will be based on meeting acceptable risk and noncancer hazard index targets with a revised RME Estimated Risk Evaluation for the southern campus expansion area of the RDV Expansion Project. The OCP and TPH housekeeping soil removal action will be considered complete following DTSC granting a No Further Action status to the project Site.	Prior To and During Construction	RSD			
HAZ-3	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.	Prior To Construction and For a Minimum of 10 years	RSD			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
Hydrology and Water Quality						
HYDRO-1	If perched groundwater is encountered during construction, the RSD shall apply for coverage under the Los Angeles RWQCB's Groundwater Discharge Permit and adhere to the permit provisions therein.	During Construction	RSD (Contractor)			
HYDRO-2	The proposed project shall meet its City of Oxnard Water Neutrality Policy requirements by completing at least one of the following: • Transfer of existing FCGMA groundwater allocations to the City; • Contributing to increased efficiency by funding City water conservation programs; • Funding recycled water retrofit projects; or • Providing additional water supplies.	Prior To and During Construction	RSD			
HYDRO-3	The RSD shall develop and implement a Site evacuation plan to be implemented in conjunction with the County of Ventura OES Dam Failure Response Plan.	Prior To Operation	RSD			
Noise						
N-1	Construction noise levels fluctuate depending on the construction phase, equipment types and duration of use; distance between noise source and sensitive receptor; and the presence or absence of barriers between noise source and receptors.	During Construction	RSD (Contractor)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	Therefore, the RSD should require construction contractors to limit standard construction activities as follows: • Equipment and trucks used for proposed project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible. In addition, the time allowed for equipment and trucks to idle will be limited to the extent practicable. • Stationary noise sources shall be located as far from adjacent receptors as possible and shall be muffled and enclosed within temporary sheds, incorporate insulation barriers or other measures to the extent feasible. • Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for proposed project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. However, where use of					

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	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 that impact equipment whenever feasible. • Heavy construction equipment operations should be limited during the school period when classrooms are being utilized in the adjacent middle school buildings. • When heavy construction activities are located within 75 feet of a residential structure, deploy a temporary portable sound barrier between the construction activities and nearest sensitive receptor.					
Transportation						
TRAF-1	**School Traffic Management Plan (TMP).** RSD develop a school TMP to document and implement measures to promote travel mode shifts, optimize on-Site circulation and provide safety for students, parents and staff (education, traffic control, physical measures such as speed bumps)**.**	Prior to Construction	RSD			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
TRAF-2	**Rose Avenue/Walnut Drive Intersection.** The County's Local Roadway Safety Plan provides several general countermeasures focused on making the path of travel clearer, including installation of retroreflective backplates and a yellow-change and all-red clearance interval update, and painting directional arrows on the eastbound approach (Walnut Drive). Additional traffic signal improvements may include provision of a protected left-turn signal head for the northbound left-turn movement, which will require a longer mast arm, and replacing the green ball of the signal face for the No. 1 southbound through lane with a green directional arrow to emphasize the through-only movement. Additional improvements may include the realignment of the crosswalk on the north side of the intersection to provide for shorter crossing times. This may require modifications to the northeast corner (ADA improvements, installation of pedestrian push button post).	Prior to Construction	RSD			
TRAF-3	**Auto Center Drive/Collins Street Intersection (Project-Specific and Cumulative).** The project-specific analysis found that the proposed project would contribute to the delays experienced at the Auto Center Drive/Collins Street intersection, which operates at LOS D in the p.m. peak hour. The low side street volumes (76 peak hour trips in the p.m. peak hour) and delays	Prior to Construction	RSD			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	would not satisfy any traffic signal warrants. The southbound approach is controlled by a stop sign and contains a shared left-right turn lane. Prohibiting parking along the west curb extending 60 feet from the intersection and restripe of the southbound approach to provide separate turn lanes will improve operations. The intersection would operate in the LOS C range as a whole, however the southbound approach would continue to operate at LOS D. Similarly existing plus project conditions, the southbound approach would continue to operate at LOS D after the restripe to separate turning lanes. This would affect 52 vehicles in the p.m. peak hour in the southbound left-turn lane. The intersection would not satisfy traffic signal warrants under cumulative plus project conditions.					
Tribal and Cultural Resources						
CUL-2	**Cultural Resource Worker Environmental Awareness Training:** Prior to any proposed construction ground disturbing activities within the project Site, the RSD Project Manager shall require the construction contractor to provide for all non-cultural resources personnel to be briefed, by a Secretary of Interior qualified project archaeologist (retained on-call by construction contractor) about the potential and procedures for an inadvertent discovery of precontact, tribal, and historic era cultural	Prior To and During Construction	RSD (Contractor / Project Archaeologist)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	resources. In addition, the training will include established procedures for temporarily halting or redirecting work in the event of a discovery, identification, and evaluation procedures for finds, and a discussion on the importance of, and the legal basis for, the protection of archaeological resources. Personnel will be given a training brochure/handout regarding identification of cultural resources, protocols for inadvertent discoveries, and contact procedures in the event of a discovery. If requested, a local tribal representative(s) shall be invited to participate in the environmental training to discuss or provide text from a tribal cultural perspective regarding the tribal cultural resources within the region.					
CUL-3	**Inadvertent Discovery Plan:** Prior to any proposed construction ground disturbing activities within the project Site, the District Project Manager shall require the construction contractor to retain a Secretary of Interior qualified archaeologist to prepare an Inadvertent Discovery Plan for the proposed project. The Inadvertent Discovery Plan will provide protocols and notification procedures in the event of an inadvertent discovery. During Project construction (e.g., ground disturbing activities such as vegetation removal, excavation, trenching,	Prior to Construction	RSD (Contractor)			

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	grading), should subsurface archaeological precontact, tribal, or historic-era cultural resources be discovered, all ground disturbing activities within 50 feet of the find shall cease and the qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the implementing agencies and any local consulting Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Under CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, Project reroute or redesign, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local consulting Native American representatives					

Mitigation Measure	Requirements of Measure	Time Frame	Responsible Party	Completed	Initials and Date	Notes/Comments
	expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as a historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2. Existing regulations require that if human remains and/or cultural items defined by HSC, Section 7050.5, are inadvertently discovered, all work in the vicinity of the find would cease and the Ventura County Medical Examiner (805-641-4400) would be contacted immediately. If the remains are found to be Native American as defined by HSC, Section 7050.5, the coroner will contact the NAHC by telephone within 24 hours.					
Utilities and Service Systems						
UTIL-1	RSD shall submit the anticipated sewer flow rates for the proposed project to the City so that it can be analyzed using the City's sewer model. Based on the results, RSD shall coordinate with the City regarding the final sewer design including any required improvements needed to provide adequate sewer service to the project Site.	Prior To Construction	RSD			

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