DRAFT ENVIRONMENTAL IMPACT REPORT

CITY OF OXNARD CALIFORNIA

Maulhardt-Stiles Sub-Neighborhood Plan Project

SCH No. 20250520414



Trinity Consultants | Meridian

MAY 2026

Draft

ENVIRONMENTAL IMPACT REPORT

MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT

CITY OF OXNARD

STATE CLEARINGHOUSE NO. 2025020414

PREPARED FOR:

City of Oxnard
214 South C Street
Oxnard, CA 93030
Contact: Joe Pearson II, AICP, Planning and Environmental Services Manager

PREPARED BY:

Trinity Consultants | Meridian

www.meridianconsultantsllc.com

Project Manager: Victor Paitimusa, Project Manager

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EXECUTIVE SUMMARY

INTRODUCTION

The California Environmental Quality Act (CEQA) was enacted to inform government decision makers and the public about the potential, significant environment effects of proposed activities, identify the way that environmental damage can be avoided or significant reduced and prevent significant, avoidable damage to the environment by requiring changes in project through the use of feasible alternatives or mitigation measures. When it is determined through preliminary review that a proposed project may result in significant impacts to the quality of the environment, preparation of an EIR in accordance with the process defined in CEQA is required.

The City of Oxnard, acting as the Lead Agency for the environmental review of this proposed Project, has prepared this Draft Environmental Impact Report (DEIR) for the proposed Maulhardt-Stiles Sub-Neighborhood Plan Project (proposed Project) in compliance with CEQA and the CEQA Guidelines (California Code of Regulations Title 14 Section 15000 et seq.).

This Executive Summary provides the information identified in Section 15123 of the CEQA Guidelines, including a brief summary of the proposed project, the environmental effects of the project as identified in this Draft EIR, proposed mitigation measures, a description of the alternatives to the project evaluated, and areas of controversy and issues to be resolved.

PROJECT DESCRIPTION

The proposed Maulhardt-Stiles Sub-Neighborhood Plan would facilitate development of a master-planned mixed-use neighborhood on approximately 107 acres within the East Village neighborhood of the Northeast Community Specific Plan (NECSP) area in the City of Oxnard, Ventura County, California. The Project Site is generally bounded by Cesar Chavez Drive to the north, Gibraltar Street and East Village Park to the east, Camino Del Sol to the south, and North Rose Avenue to the west.

The Project proposes adoption of a Sub-Neighborhood Plan, as allowed under the NECSP, to guide development of a walkable urban village that includes residential neighborhoods, neighborhood-serving commercial uses, parks, and supporting circulation improvements. The Sub-Neighborhood Plan would allow development of up to 950 residential dwelling units, up to 40,000 square feet of commercial uses, approximately 12.9 acres of parks and open space, and a network of public and private streets, pedestrian pathways, and bicycle facilities, including multi-use paths that enhance connectivity within the East Village area.

The Project Site is organized into three Planning Areas. Planning Area A (North Neighborhood) would accommodate the majority of new development and would include a mix of residential housing types, neighborhood-serving commercial uses near the intersection of Rose Avenue and Cesar Chavez Drive, and several parks and open space areas, including the West Green neighborhood park

and an expansion of East Village Park. Planning Area B consists of the existing Del Sol High School, which opened in 2023 and is considered part of the existing environmental setting for purposes of this EIR. Planning Area C (Southwest Neighborhood) would include additional residential development organized around a central neighborhood park and connected to the surrounding street network and pedestrian system.

Development within the Sub-Neighborhood Plan would incorporate a grid-based street network, pedestrian-oriented design features, and bicycle and transit connections intended to improve circulation and support walkability consistent with the City of Oxnard General Plan and NECSP vision for the East Village area.

PROJECT ALTERNATIVES

As required by Section 15126.6 of the CEQA Guidelines, this EIR examines a reasonable range of alternatives to the proposed project to provide additional information on ways to avoid or lessen significant impacts identified for the proposed Project. As summarized below, the proposed Project would result in significant impacts to Agricultural and Cultural (Historic) Resources that cannot be reduced to less than significant. Additionally, the Project would result in significant Air Quality impacts that cannot be mitigated to less than significant. All other potentially significant impacts can be mitigated to less than significant.

The Alternatives to the Project evaluated in this Draft EIR include:

- Alternative 1 – No Project/No Development
- Alternative 2 – Existing Land Use Designations/Zoning
- Alternative 3 – Phase I Only

The CEQA Guidelines require analysis of the No Project Alternative. In addition to the No Project Alternative (Alternative 1), two development alternatives were identified for evaluation. Because the proposed Project requires a General Plan Amendment and Zone Change, Alternative 2 (Existing Land Use Plans/Zoning) examines development of the Project Site as allowed by the General Plan land use designation and zoning. This alternative would allow less residential development and more commercial development than the proposed Sub-Neighborhood Plan. This alternative is evaluated to determine if any of the significant impacts of the Project as proposed would be avoided or substantially lessened. Alternative 3 (Phase I Only) would include the development proposed within Area A by the proposed Sub-Neighborhood Plan, but not development of Area C, which contains historic resources that would be impacted by implementation of the proposed Project.

A brief description of each of these Alternatives is provided below with a summary of the evaluation of each.

Alternative 1—No Project/No Development Alternative

CEQA requires evaluation of a No Project/No Development Alternative to provide a baseline against which the environmental effects of the proposed Project and other alternatives can be compared, and to disclose the environmental consequences that would occur if the Project were not approved.

With the No Project/No Development Alternative (Alternative 1), the Project Site would remain in its current condition, which primarily consists of undeveloped land previously disturbed by agricultural use, Del Sol High School, the Maulhardt family residence, barn, cottages, outbuildings, and other agricultural structures, and a fallow lemon orchard. This status would continue and the existing environmental conditions would be maintained. None of the impacts associated with the proposed Project would occur. However, Alternative 1 would not meet any of the objectives of the proposed Project.

Alternative 2—Existing Land Use Designation/Zoning

The proposed Project requires a General Plan land use amendment and zone change to develop the Project Site as planned. The Existing Land Use Designations/Zoning Alternative (Alternative 2) evaluates development of the Project Site consistent with the existing City of Oxnard General Plan land use designations and zoning regulations, without adoption of the proposed Sub-Neighborhood Plan. Under this Alternative, development would occur as allowed by the Residential Low Medium (RLM), General Commercial (CG), and Park (PRK) land use designations and existing zoning for the Project Site, including Multiple-Family Residential Planned Development (R-2-PD), General Commercial Planned Development (C-2-PD), and Community Reserve (C-R).

As shown in **Figure 6.0-1: Alternative 2 Land Use Plan** in **Section 6.0: Alternatives** of this Draft EIR, development of the Project Site would include up to 126 residential dwelling units, up to 60,000 square feet of commercial space, and approximately 34 acres of park and open space, along with supporting infrastructure improvements such as internal roadways, pedestrian and bicycle facilities, and utility connections. Compared to the proposed Project, Alternative 3 would result in a reduction in the number residential units, and an increase in the amount of commercial space and park acreage compared to the Project as proposed.

Due to the substantial reduction in residential development, Alternative 2 would substantially lessen significant air quality impacts compared to the proposed Project to less than significant. Alternative 2 would also incrementally reduce impacts related to aesthetics and urban design, energy use, and greenhouse gas emissions. Agricultural resource impacts would remain significant and unavoidable with Alternative 2, similar to the proposed Project. Similar to the proposed Project, Alternative 2 would result in less than significant impacts related to biological resources, cultural resources, geology and soils, noise, transportation and circulation, and tribal cultural resources with mitigation incorporated. Alternative 2 would result in less than significant impacts related to hydrology and

water quality, land use and planning, mineral resources, population and housing, public services and recreation, and utilities and service systems.

Alternative 2 would partially meet several of the Project objectives, particularly those related to park provision and general land use compatibility. However, Alternative 2 would not fully meet key objectives related to maximizing housing production, providing affordable housing opportunities, and creating a compact, mixed-use urban village consistent with the City's long-term vision for growth at the Project Site.

Alternative 3—Phase I Only

Alternative 3 would develop Phase I of the proposed Project, which would be to develop only Area A as planned. This alternative is proposed because the proposed Project would result in significant impacts to historic resources located in Area C. Under this Alternative, Planning Area C would remain in its existing condition and would not be developed as part of the proposed Project.

Under a maximum development scenario, Alternative 3 would accommodate up to approximately 656 residential dwelling units, up to approximately 37,000 square feet of commercial space, and approximately 10 acres of parks and open space. Compared to the proposed Project, Alternative 3 would result in a reduction in overall development intensity, including fewer residential units, less commercial space, and a reduction in park acreage.

Due to the reduction residential, commercial, and open space intensity, Alternative 3 would substantially lessen significant and unavoidable air quality and avoid historic resource impacts compared to the proposed Project to less than significant. Alternative 3 would also incrementally reduce impacts agricultural resources, biological resources, energy use, greenhouse gas emissions, population and housing, public services and recreation, and utilities and service system impacts. While Alternative 3 would avoid permanent conversion of Area C to non-agricultural use, impacts to agricultural resources would remain significant and unavoidable with Alternative 2, similar to the proposed Project. Similar to the proposed Project, Alternative 2 would result in less than significant impacts related to biological resources, cultural resources, geology and soils, noise, transportation and circulation, and tribal cultural resources with mitigation incorporated. Alternative 2 would result in less than significant impacts related to hydrology and water quality, land use and planning, mineral resources, population and housing, public services and recreation, and utilities and service systems.

Alternative 3 would meet or partially meet many of the Project objectives, particularly those related to development of a walkable urban village, provision of neighborhood-serving commercial uses, delivery of affordable housing, and creation of a human-scaled neighborhood consistent with the City's design standards. However, because Alternative 3 would limit development to Area A and would not develop Area C, it would not fully meet objectives related to maximizing residential development potential and park provision across the entire Project Site.

Environmentally Superior Alternative

Of the Alternatives considered, Alternative 1, the No Project/No Development Alternative, would be considered environmentally superior, because it would result in the greatest incremental reduction of the overall level of impact when compared to the proposed Project. However, according to the State CEQA Guidelines, if the No Project/No Development alternative is identified as the environmentally superior Alternative, the Draft EIR shall also identify an environmentally superior alternative among the other alternatives. Of the other alternatives considered, Alternative 3 would be considered environmentally superior because it would result in substantially reduced significant impacts related to air quality and cultural resources as compared to the proposed Project to less than significant, while still allowing development consistent with key Project Objectives.

AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

During the Notice of Preparation (NOP) process, agencies requested standard analysis related to the conversion of agricultural land, transportation and circulation, biological resources, and consistency with long-range planning documents. However, there were no issues of controversy identified through the scoping process. Issues to be resolved include whether the significant unavoidable impacts identified for the Project related to air quality, conversion of farmland to urban uses, and impacts to historic resources can be further mitigated.

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A summary of the potential environmental impacts of the proposed Project and the measures identified to mitigate these impacts are provided below for each topic addressed in this Draft EIR. **Table ES-1: Summary of Project Impacts, Mitigation Measures, and Level of Impact After Mitigation—Maulhardt-Stiles Sub-Neighborhood Plan Project—City of Oxnard** summarizes the significance of the impacts of the proposed Project based on the information and analysis in **Section 4.0: Environmental Impact Analysis** of this Draft EIR.

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Aesthetics and Urban Design			
a) Would the project have a substantial adverse effect on a scenic vista such as an ocean or mountain view from an important view corridor or location as identified in the 2030 General Plan or other City planning documents?	**Less Than Significant.** The Project Site is located within an urbanized area and does not contain or provide views of beaches, coastline, local waterways, agricultural greenbelts, or other primary scenic vistas identified in the General Plan. Views of the Coastal Mountain Range are partially obstructed by existing development, and the Project would incorporate building height limits, setbacks, and a landscaped buffer along North Rose Avenue to preserve identified view corridors. The Project would not substantially obstruct scenic vistas. Impacts would be less than significant.	No mitigation measures are necessary.	N/A
c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings such as by creating new development of other physical changes that are visually incompatible with surrounding areas? (Public views are those that are experienced from a publicly	**Less Than Significant.** The Project Site is surrounded by existing urban development and is located within an Urban Village Overlay area as defined in the Oxnard General Plan. The proposed Sub-Neighborhood Plan would regulate building height, scale, massing, and design to ensure compatibility with surrounding neighborhoods and consistency with the City's General Plan, NECSP, and zoning regulations. The Project would	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality, such as visual resource policies contained in the 2030 General Plan or other City Planning documents?	not degrade visual character or conflict with applicable visual resource policies. Impacts would be less than significant.		
Agricultural Resources			
a) **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?**	**Potentially Significant Impact.** The Project Site contains Prime Farmland and Farmland of Statewide Importance as mapped by the California Department of Conservation. Implementation of the proposed Sub-Neighborhood Plan would convert agricultural land in Areas A and C to urban uses. Conversion of Prime Farmland would result in a significant impact.	**MM AG-1:** Prior to issuance of the first grading permit, the Applicant shall make available the top 12 inches of agricultural soil (topsoil) from Areas A and C of the Project for relocation and reuse on agricultural lands with lower quality soils, defined as lands not classified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland under the Department of Conservation Farmland Mapping and Program. The receiving site must be local (within Ventura County), must be of equivalent size (approximately 56.42 acres), and must be protected by a permanent conservation easement or deed restriction ensuring the land remains in agricultural use in	Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		perpetuity. The language of the conservation easement or deed restriction shall be subject to approval of the City of Oxnard. The Applicant shall coordinate with local farmers, agricultural operators, or other appropriate entities to identify receiving sites. If a receiving site is identified, the party accepting the soil shall be responsible for the removal, transport, and placement of the soil at the receiving site, subject to approval by the City. Documentation demonstrating a good faith effort to identify a receiving site, including outreach to local agricultural operators, shall be provided to the City prior to the issuance of the first grading permit. If the Applicant demonstrates to the satisfaction of the City that relocation and reuse to the topsoil from Area A and Area C is not feasible (e.g., no receiving site is available, no entity elects to accept the soil, or the deed restriction or conservation easement, the Applicant shall pay an agricultural conversion in-lieu fee of $1,351,671.43 to the City of Oxnard (based on $23,957.31 per acre for the	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		56.42 acres in Areas A and C prior to issuance of the first grading permit. The in-lieu fees collected shall be used at the discretion of the City to support agricultural resource preservation and agricultural viability within the region, including but not limited to land acquisition, agricultural infrastructure improvements, and the development, refurbishment, or construction of farmworker housing within the City of Oxnard.	
Air Quality			
a) Would the project conflict with or obstruct implementation of the Ventura County AQMP?	**Potentially Significant Impact**. The Project is located within the South Central Coast Air Basin, which is designated nonattainment for ozone and particulate matter. Construction and operation of the Project would generate criteria air pollutant emissions that exceed Ventura County Air Pollution Control District thresholds. The proposed Project would represent a fraction of the projected citywide population growth through 2050.	**MM AQ-1**: Construction Equipment. The applicant for an individual development project within the Maulhardt-Stiles Sub-Neighborhood Plan area shall ensure the following requirements are incorporated into applicable bid documents, purchase orders, and contracts. Contractors shall confirm the ability to supply the compliant construction equipment prior to any ground-disturbing and construction activities: ● Mobile off-road construction equipment (wheeled or tracked) greater than 50 hp used during	Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		construction of the project shall meet the U.S. EPA Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, the equipment shall, at a minimum, meet the Tier 3 standards. Zero-emissions construction equipment may be incorporated in lieu of Tier 4 final equipment. A copy of each equipment's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each piece of equipment.	
b) Would the project result in a cumulatively considerable net increase of any criteria air pollutant in excess of quantitative thresholds recommended by the VCAPCD?	**Potentially Significant Impact.** The Project would generate construction and operational emissions of ozone precursors within a nonattainment air basin. Operational emissions would exceed Ventura County Air Pollution Control District significance thresholds and would contribute to a	Refer to **MM AQ-1,** above.	Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	cumulatively considerable net increase of criteria air pollutants.		
c) **Would the project expose sensitive receptors to substantial pollutant concentrations?**	**Less Than Significant.** Sensitive receptors are located near the Project Site; however, the Project would not introduce major new stationary sources of air pollution. Construction-related emissions would be temporary in nature, and operational emissions would not result in substantial pollutant concentrations at nearby sensitive receptors.	Refer to **MM AQ-1,** above.	Less Than Significant
Biological Resources			
a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**	**Potentially Significant Impact.** The Project Site contains habitat suitable for special-status wildlife species, including California horned lark, burrowing owl, roosting bats, and nesting migratory birds. Implementation of the Project would result in removal and disturbance of vegetation, structures, and ground surfaces that could support nesting, roosting, or foraging by special-status species. Without mitigation, Project activities could result in direct mortality, nest abandonment, or	**MM BIO-1**: **Pre-Construction Surveys and Monitoring for Nesting Raptors and Migratory Birds** The following actions should be undertaken to avoid and minimize potential impacts to nesting birds: To the extent feasible, construction activities will be scheduled to avoid the nesting season and occur between October and January. For activities that cannot avoid the nesting season (February 1 to August 31), not more than 30 days prior to initiation of construction activities	Less Than Significant with Mitigation Incorporated

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	disturbance of special-status species and protected wildlife, resulting in a significant impact.	(e.g. mobilization and staging) and no more than 5 days prior to initiation of construction activities, a qualified biologist shall conduct pre-construction surveys for nesting raptors and other migratory birds. The survey for the presence of nesting raptors shall cover all areas within the disturbance footprint plus a 500-foot buffer where access can be secured. The survey for Protected birds shall cover all areas within the disturbance footprint plus a 250-foot buffer. If project activities completely cease for five days during the nesting season, the pre-construction nesting survey shall be conducted again to ensure no nesting birds have moved into the Project site. Survey reports shall be submitted to the appropriate agency(s), if requested, within one week of completing pre-construction nesting surveys. There is moderate potential for overwintering burrowing owl within the Project Site and a California horned lark was observed during the survey. If active nests (nests with eggs or chicks) are located, the qualified	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		biologist shall establish an appropriate avoidance buffer ranging from 50 to 500- feet based on the species biology and current and anticipated disturbance levels occurring in vicinity of the nest. All buffers shall be marked using high-visibility flagging, fencing, and/or signage. No construction activities shall be allowed within the buffers until the nest is determined inactive by a qualified biologist. Encroachment into the buffer shall be conducted at the of a qualified biologist. Monitoring reports summarizing nest avoidance measures, including buffers, fledge dates, and documentation of the avoidance of fully protected species, if applicable, shall be submitted to the City of Oxnard monthly while nest buffers are in place or while activities are occurring within the specified buffer of an inactive nest of a fully protected species. **MM BIO-2: Protocol Level Non-Breeding Season Surveys for Burrowing Owl**	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Protocol level non-breeding season surveys for burrowing owl shall be conducted by a qualified biologist prior to ground disturbance associated with construction activities. The surveys shall be conducted in accordance with the guidelines described in the CDFW Staff Report on Burrowing Owl Mitigation, 2012. A minimum of four (4) visits surveys will be conducted, spread evenly, throughout the nonbreeding season (September 1 to January 31). Each survey will consist of straight line transect between 7 and 20 meters apart in all suitable burrowing owl habitat. Surveys will be conducted within 5 days prior to the commencement of ground disturbance activities within the Project Site and a 250-foot buffer area around the Site, where access is permitted. A survey report will be prepared and submitted to CDFW in accordance with the guidelines described in the CDFW Staff Report on Burrowing Owl Mitigation, 2012. If burrowing owls are detected within the Project Site or within the 250-foot buffer, no construction work can occur, and the	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		CDFW shall be contacted immediately to develop and implement a mitigation plan to protect burrowing owls and their nest overwintering sites. **MM BIO-3: Pre-Construction Surveys for Roosting Bats** To avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken: ● To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season. ● If trees must be encroached during the maternity season (March 1 to September 30), or structures must be removed at any time of the year, a qualified biologist shall conduct a minimum of two pre-construction surveys to identify	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		those trees or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats. The pre-construction surveys should be conducted with a handheld active monitoring detector plus night vision. Additionally, a passive monitoring detector should be deployed for three nights. If roosting bats are found a buffer should be established in addition to a qualified monitor. Pre-construction surveys should be conducted before the start of construction activities and if project-related activities are halted for five days or more. • Each tree or structure identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the qualified biologist no greater than seven days prior to tree disturbance to more precisely determine the presence or absence of roosting bats.	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• In the event a maternal or hibernating colony of bats is found no work shall be conducted within 300 ft of the roosting site until the maternal season is over or the bats have left the site. The roosting site should be designated a sensitive area and protected as such until the bats have left the site. No clearing or grubbing should occur within the 300 ft buffer of the site. In addition, no combustion equipment such as generators, pumps, and vehicles should not be parked nor operated in the buffer area. Fencing or other barriers should be installed around the buffer area and construction personnel should not be allowed to enter areas beneath the roosting site, especially during the evening exodus. **MM BIO-4: Crotch's Bumble Bee Surveys and Avoidance.** Prior to the initiation of ground-disturbing activities, including grading and vegetation removal, a qualified biologist shall conduct protocol-level	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		surveys for Crotch's bumble bee (Bombus crotchii) in accordance with current California Department of Fish and Wildlife (CDFW) guidance, where applicable, and based on appropriate seasonal survey windows when the species is most likely to be detected. Surveys shall focus on suitable foraging and nesting habitat within and immediately adjacent to the Project Site, including areas with flowering plant resources and small mammal burrows or other potential nesting substrates. If Crotch's bumble bee is not detected during protocol-level surveys, no further action is required. If the species is detected, the qualified biologist shall establish appropriate avoidance buffers around active nesting or high-use foraging areas, as feasible, to prevent direct impacts during construction. The extent of buffers shall be determined by the qualified biologist in coordination with CDFW, as appropriate. If avoidance is not feasible, additional measures shall be developed in coordination with CDFW to minimize	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		impacts, which may include seasonal restrictions, relocation of individuals where authorized, or other agency-approved measures. A Worker Environmental Awareness Program (WEAP) shall be conducted to inform construction personnel of the potential presence of Crotch's bumble bee and the required avoidance measures. The qualified biologist shall monitor initial ground-disturbing activities in suitable habitat to ensure compliance with avoidance and minimization measures.	
b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations adopted by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	**Less Than Significant.** The Project Site does not contain riparian habitat, wetlands, or other sensitive natural communities as defined by applicable federal, state, or local regulations. Vegetation communities within the Project Site consist of disturbed land, coyote brush scrub, developed areas, and a fallow orchard, none of which are considered sensitive natural communities. The Project would not directly impact riparian habitat or sensitive natural communities.	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
d) **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**	**No Impact.** The Project Site is fully surrounded by existing urban development and does not function as a regional wildlife corridor, habitat linkage, or native wildlife nursery site. The Project Site does not provide connectivity between large natural open space areas, and Project implementation would not interfere with wildlife movement or established migration corridors.	No mitigation measures are necessary.	N/A
e) **Would the project conflict with any local policies or ordinances protecting biological resources?**	**No Impact.** The Project Site does not contain designated sensitive habitat, critical habitat, or protected trees, and no local ordinances specifically protect biological resources on the Project Site. Implementation of the Project would not conflict with applicable local policies or ordinances protecting biological resources.	No mitigation measures are necessary.	N/A
Cultural Resources			
a) **Would the project cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5?**	**Potentially Significant Impact.** The Project Site contains historical resources associated with the past agricultural use of the Maulhardt property. The main residence, barn, garage/living quarters, and	**MM CUL-1: Historic Resource Documentation** Prior to the City of Oxnard's acceptance of any property within Area C, the Applicant shall photo-	Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	associated ranch yard buildings are eligible for listing in the National Register of Historic Places, California Register of Historical Resources, and/or as City Landmarks. Implementation of the proposed Sub-Neighborhood Plan would require demolition of these eligible historic resources. Demolition of eligible historical resources would result in a substantial adverse change in their significance, constituting a significant impact.	document Area C and prepare a written report documenting existing conditions prior to project construction. The recordation will be of sufficient detail to preserve a visual record of the buildings and their setting and shall meet the Historic American Buildings Survey (HABS)/ Historic American Engineering Record (HAER) standards for documentation and photo-documentation of historic resources at a minimum Level 1 Recordation; however, the documentation is not required to be formally submitted to or accepted by the National Park Service. This documentation will be donated to a suitable repository, such as the Oxnard Public Library and the Museum of Ventura County. The documentation plan for the Project Site and its setting shall be prepared by the project applicant and reviewed and approved by the City of Oxnard prior to issuance of any grading permit, demolition permit, or other ground-disturbing construction permit affecting the identified historical resources. All photographic and written documentation shall be completed prior to any demolition,	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		alteration, or ground disturbance within Area C. The documentation shall be prepared by a County-approved architectural historian meeting the Secretary of the Interior's Professional Qualification Standards and shall demonstrate experience applying the Secretary of the Interior's Standards for the Treatment of Historic Properties, including the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, consistent with HABS-level documentation requirements. The project applicant shall be responsible for retaining the qualified professional and ensuring completion and submittal of the documentation to the City and the designated local repository prior to commencement of construction activities.	
b) Would the project cause a substantial adverse change in the significance of a unique archaeological resource pursuant to State CEQA Guidelines Section 15064.5?	**Potentially Significant Impact.** Archaeological investigations identified historic-era artifacts within disturbed contexts on the Project Site and determined that no known archaeological resources eligible for listing in the California Register are present. However, ground-disturbing	**MM CUL-2 : Archaeological Monitoring** Prior to issuance of any grading permit or other ground-disturbing permit, the project applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional	Less Than Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	activities associated with Project development could result in the inadvertent discovery of previously unidentified archaeological resources. Without mitigation, Project activities could adversely affect unknown archaeological resources, resulting in a potentially significant impact.	Qualification Standards to prepare a Cultural Resources Monitoring and Inadvertent Discovery Plan (CRMIDP). The CRMIDP shall be submitted to and approved by the City prior to commencement of any ground-disturbing activities. Consistent with the recommendations of the Phase I, Extended Phase I (XP1), and Phase II archaeological studies, the CRMIDP shall include the following: 1. Identification of archaeologically sensitive areas within Area C, including locations where prior investigations identified historic-period artifact concentrations associated with the Maulhardt Ranch. 2. Archaeological monitoring during initial ground-disturbing activities in identified sensitive areas, including grading, trenching, excavation, and utility installation. 3. Authority for the qualified archaeologist to temporarily	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		halt or redirect construction within at least 50 feet of a discovery until the find can be evaluated. 4. Evaluation of any discovered cultural materials pursuant to CEQA Guidelines Section 15064.5 to determine whether the resource qualifies as a historical resource. 5. If significant archaeological deposits are identified, preparation of a treatment plan prior to resumption of construction in the affected area. 6. Implementation of appropriate treatment measures, which may include avoidance and preservation in place where feasible, or controlled excavation and data recovery if avoidance is not feasible. 7. Documentation of recovered materials, laboratory analysis as appropriate, and curation at an appropriate	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		qualified repository consistent with professional standards. 8. Preparation of a final monitoring and treatment report summarizing monitoring activities, discoveries, and implemented mitigation measures, to be submitted to the City prior to issuance of a certificate of occupancy for the affected phase of development.	
Energy			
a) **Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, maintenance?**	**Less Than Significant.** Project construction would require the use of energy in the form of gasoline and diesel fuel for construction equipment, haul trucks, and worker trips, as well as limited electricity for water conveyance and lighting. Construction methods would be typical of similar development projects and would not require unusually energy-intensive equipment or practices. Operation of the Project would increase demand for electricity, natural gas, and	No mitigation measures are necessary.	N/A

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	transportation fuels compared to existing conditions; however, energy consumption would represent a small fraction of regional supply and would not result in wasteful, inefficient, or unnecessary use of energy resources. The Project's energy demands would be consistent with typical residential, commercial, educational, and park uses of similar scale and intensity.		
b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	**Less Than Significant.** The Project would be required to comply with applicable state and local energy efficiency and renewable energy regulations, including Title 24 Building Energy Efficiency Standards, the California Green Building Standards Code (CALGreen), and applicable City of Oxnard General Plan policies. The Project would also be consistent with the energy-related goals of the City of Oxnard Climate Action and Adaptation Plan and the SCAG Regional Transportation Plan/Sustainable Communities Strategy. Implementation of the Project would not conflict with or obstruct state or local plans for renewable energy or energy efficiency.	No mitigation measures are necessary.	N/A

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Geology and Soils			
a.i) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42?	**Less Than Significant.** The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known active fault traces traverse the site. Development of the Project would not expose people or structures to surface fault rupture.	No mitigation measures are necessary.	N/A
a.ii) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?	**Potentially Significant Impact.** The Project Site is located in a seismically active region of Southern California and would be subject to strong ground shaking during a seismic event. Without incorporation of site-specific seismic design measures, strong ground shaking could pose risks to structures and occupants.	**MM GEO-1:** In order to provide more uniform foundation support for development of the proposed Project, the following measures, as further detailed in the Preliminary Geotechnical Feasibility Study for the Proposed Tentative Tract No. 6059, Maulhardt/Stiles Ranch, shall be included in the design of buildings: i. Over-excavation and replacement of the near surface soils with a shallow	Less Than Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		geogrid-reinforced gravel raft and engineered fill; ii. Vibro stone columns; iii. A rammed aggregate pier system; and/or iv. A rapid impact compaction program. It should be noted that final ground improvement and foundation design recommendations shall comply with the current California Building Code and shall be subject to review and approval by a state-licensed geotechnical engineer or engineering geologist during final design.	
a.iii) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?	**Potentially Significant Impact.** The Project Site is underlain by young alluvial soils and has relatively shallow groundwater, conditions that are conducive to liquefaction. Portions of the site exhibit low to high liquefaction potential depending on localized soil conditions. Without site-specific engineering design measures, seismic-related ground failure could pose risks to structures and infrastructure.	Refer to **MM GEO-1,** above.	Less Than Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
b) Result in substantial soil erosion or the loss of topsoil?	**Less Than Significant.** Project grading and earthwork could cause soil erosion or loss of topsoil; however, the Project would be required to implement erosion and sediment control best management practices (BMPs) consistent with the General Construction Permit during construction and incorporate drainage control features consistent with the Municipal Separate Storm Sewer Systems (MS4) Permit during operation. With required regulatory compliance, the potential for soil erosion or loss of topsoil would be minimized, and impacts would be less than significant.	No mitigation measures are necessary.	N/A
c) Be located on a geologic unknit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	**Potentially Significant Impact.** The Project Site is underlain by alluvial soils with moderate to high potential for settlement and subsidence, and portions of the site have conditions that could support liquefaction during seismic events. Without geotechnical design measures, these conditions could result in ground instability affecting structures and infrastructure.	Refer to **MM GEO-1,** above.	Less Than Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**	**Potentially Significant Impact.** Soils within the Project Site exhibit clayey characteristics and moisture sensitivity that could result in expansive behavior. Without appropriate foundation and soil design measures, expansive soils could pose risks to structures.	Refer to **MM GEO-1,** above.	Less Than Significant
e) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**	**Potentially Significant Impact.** While shallow soils on the Project Site have low paleontological sensitivity, deeper excavations could encounter underlying Pleistocene deposits with moderate to high paleontological sensitivity. Ground-disturbing activities could damage or destroy unknown paleontological resources if present.	**MM GEO-2: Paleontological Monitoring Plan and Monitoring** A qualified project paleontologist shall prepare an paleontological monitoring plan and will be present on-site during ground disturbing activities in the case of unanticipated discovery of potential paleontological resources. If unidentified paleontological resources are encountered during construction within the Project Site, then the archaeologist will have the authority to halt work within 50 feet of the area until the project paleontologist can assess the find; determine its potential for significance; and develop measures to eliminate adverse impacts.	Less Than Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Greenhouse Gas Emissions			
a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	**Less Than Significant.** Construction and operation of the Project would generate greenhouse gas emissions from mobile sources, energy use, water and wastewater conveyance, and solid waste disposal. However, no numeric greenhouse gas significance threshold has been adopted by the City, and the Project's emissions would represent a small contribution to statewide and regional greenhouse gas emissions. The Project would not result in greenhouse gas emissions that would individually or cumulatively result in a significant impact on the environment.	No mitigation measures are necessary.	N/A
b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	**Less Than Significant.** The Project would be subject to and required to comply with applicable state, regional, and local greenhouse gas reduction regulations and plans, including the California Air Resources Board Climate Change Scoping Plan, the SCAG Regional Transportation Plan/Sustainable Communities Strategy, the City of Oxnard General Plan, and the City of Oxnard Climate	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	Action and Adaptation Plan. Consistency with these adopted plans and policies demonstrates that the Project would not conflict with greenhouse gas reduction strategies. Impacts would be less than significant.		
Hazards and Hazardous Materials			
a) **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**	**Less Than Significant.** Construction and operation of the Project would involve the use, storage, and disposal of limited quantities of hazardous materials commonly associated with residential, commercial, and open space land uses. Compliance with applicable federal, State, and local regulations governing hazardous materials handling would ensure that routine transport, use, and disposal of hazardous materials would not create a significant hazard to the public or the environment.	No mitigation measures are necessary.	N/A
b) **Would the project create a substantial hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving**	**Less Than Significant.** Construction activities could involve earthmoving, demolition, and the handling of materials that have the potential to result in accidental spills or releases. However, site investigations and risk	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

	Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	the release of hazardous materials into the environment?	evaluations identified no significant soil, soil vapor, or groundwater contamination, and no further remedial action is required. Compliance with existing hazardous materials regulations would minimize the potential for accidental releases, and upset or accident conditions would not create a substantial hazard.		
c)	**Would the project emit hazardous substances or handle hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school?**	**Less Than Significant.** Schools are located within and near the Project Site; however, the Project would not involve land uses that emit hazardous substances or handle acutely hazardous materials in quantities that would pose a risk to nearby schools. Site investigations determined that existing soil and groundwater conditions do not present a significant health concern, and compliance with hazardous materials regulations would avoid adverse effects on nearby school receptors.	No mitigation measures are necessary.	N/A
f)	**Would the project impair implementation of or physically interfere with an adopted emergency operations plan or Ventura County Operation Area**	**Less Than Significant.** The City of Oxnard Emergency Operations Plan provides a comprehensive framework for emergency response and evacuation consistent with state and	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

	Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	response Protocol or City of Oxnard emergency evacuation protocols?	federal requirements. The Project Site is not located on a designated evacuation route, and development of the Project would not interfere with implementation of the City's emergency operations or evacuation protocols.		
	Hydrology and Water Quality			
a)	**Would the project cause a violation of any adopted water quality standards or waste discharge or treatment requirements?**	**Less Than Significant.** Construction and operation of the Project would generate stormwater runoff and typical urban pollutants; however, the Project would be required to comply with applicable water quality standards and waste discharge requirements. With required regulatory compliance, the Project would not cause a violation of adopted water quality standards or discharge requirements.	No mitigation measures are necessary.	N/A
b)	**Would the project substantially deplete groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**	**Less Than Significant.** The Project would increase impervious surfaces but would incorporate site design features to manage runoff and infiltration. The Project is planned for development under the City's Urban Water Management Plan and would comply with the City's water	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	neutrality policy. Groundwater use would remain within allocated supplies, and the Project would not substantially deplete groundwater resources or interfere with sustainable groundwater management.		
c.i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would: Result in substantial erosion or siltation on- or off-site?	**Less Than Significant.** Project grading and development would alter site drainage features; however, drainage improvements would be designed to maintain controlled runoff and prevent substantial erosion or siltation on- or off-site.	No mitigation measures are necessary.	N/A
c.ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would: Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	**Less Than Significant.** The Project would include stormwater detention and drainage facilities designed to limit runoff to established discharge rates. Development of the Project would not substantially increase surface runoff volumes or cause flooding on- or off-site.	No mitigation measures are necessary.	N/A
c.iii) Would the project substantially alter the existing drainage pattern of the site or area,	**Less Than Significant.** Stormwater runoff from the Project Site would be conveyed through existing and	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
including through the alteration of the course of a stream or river, in a manner that would: Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	planned drainage systems in accordance with established discharge limitations. The Project would not exceed the capacity of stormwater drainage facilities or generate substantial additional polluted runoff.		
c.iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would: Impede or redirect flood flows?	**Less Than Significant.** The Project Site is not located within a 100-year floodplain, and proposed drainage improvements would maintain stormwater flows consistent with existing conditions. Development of the Project would not impede or redirect flood flows.	No mitigation measures are necessary.	N/A
d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	**Less Than Significant.** The Project Site is not located within a flood hazard, tsunami, or seiche zone. The Project would not be subject to inundation that could result in the release of pollutants.	No mitigation measures are necessary.	N/A
e) Would the project conflict with or obstruct implementation of the water quality basin plan for Oxnard in the "Los Angeles region Basin Plan for the	**Less Than Significant.** The Project would comply with applicable water quality control plans, NPDES permits, and the FCGMA GSP. Development of the Project would not conflict with or	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

	Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	Coastal Watersheds of Los Angeles and Ventura Counties," National Pollutant Discharge Elimination System (NPDES) permits and associated local standards, or the Fox Canyon Groundwater Management Agency Groundwater Sustainability Plan (FCGMA GSP) for sustainable groundwater management?	obstruct implementation of adopted water quality or groundwater management plans.		
	Land Use and Planning			
b)	**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 a significant environmental effect?**	**Less Than Significant.** The proposed Sub-Neighborhood Plan would develop the Project Site with a mix of residential, commercial, educational, and open space uses consistent with the City of Oxnard 2030 General Plan Urban Village designation, the Northeast Community Specific Plan, applicable zoning regulations, and regional planning objectives under SCAG Connect SoCal. The Project would support compact, mixed-use infill development within the City Urban Restriction Boundary, provide a variety of housing types including affordable housing, promote multimodal transportation, and	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	integrate public facilities such as parks and schools. With approval of the required General Plan Amendment, Specific Plan Amendment, and Zone Change, the Project would not conflict with adopted land use plans, policies, or regulations intended to avoid or mitigate environmental effects, and would not physically divide an established community.		
Mineral Resources			
a) **Would the project result in the loss of availability of a known mineral resource of value to the region and the residents of the state?**	**Less Than Significant.** Although portions of the Project Site are designated as Mineral Resource Zone (MRZ)-2, MRZ-3, and Mineral Sector C, the Project Site and surrounding areas are developed or planned for urban uses that are incompatible with mineral resource extraction. Existing land uses, including Del Sol High School and surrounding residential and commercial development, preclude feasible mining operations. In addition, the Project Site has been planned for residential, commercial, and open space development under the City's General Plan and Northeast Community Specific Plan.	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	Implementation of the Project would not result in the loss of availability of a regionally important mineral resource.		
b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated in the 2030 General Plan, Specific Plan, or other land use plan?	**Less Than Significant.** While the Project Site includes areas classified as MRZ-2 and MRZ-3, locally important mineral resource recovery areas are primarily located along the Santa Clara River channel, the US-101 corridor, and other portions of the City. The Project Site is not identified as an active or planned mineral resource recovery site in the City's General Plan or other adopted land use plans. Additionally, no active oil or gas wells are located within or adjacent to the Project Site. The Project would not result in the loss of availability of a locally important mineral resource recovery site.	No mitigation measures are necessary.	N/A
Noise			
a) Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the Oxnard 2030	**Potentially Significant Impact.** Construction activities associated with grading, building construction, and paving would generate temporary noise levels that could exceed City noise thresholds at nearby sensitive	**MM NOI-1: Construction Noise Reduction Measures** The proposed project shall comply with the City of Oxnard Noise Element and any subsequent ordinance that prohibit the emission or creation of	Less Than Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
General Plan or noise ordinance, or applicable standards of other agencies?	receptors, including single-family residences and Del Sol High School. Without noise control measures, construction noise levels could exceed applicable daytime significance thresholds. Operational noise from project-generated traffic, stationary sources, and on-site activities would not result in permanent increases in ambient noise levels exceeding applicable standards.	noise beyond certain levels at adjacent uses. To implement **MM-NOI-1** and reduce construction noise, the Contractor would be required to implement reduction measures, prior to the start of construction activities, as determined by the City of Oxnard, which may include but are not limited to: ● Install a temporary 8-foot-tall construction noise barrier between the Project Site and the single-family residential uses along Milagro Place and Gibraltar Street and along Cesar Chavez Drive, as well as between the Project Site and Del Sol High School. ● Retrofit mobile equipment with optimal muffler systems capable of reducing construction noise levels by 10 dBA or more. ● Enclose stationary equipment with shields capable of achieving noise reductions of up to 10 dBA. ● Locate all construction areas for staging and warming up as far as possible from adjacent	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		residential buildings and sensitive receivers.	
b) Would the project generate or expose persons to excessive groundborne vibration or groundborne noise levels?	**Less Than Significant.** Construction activities would generate groundborne vibration; however, vibration levels from anticipated construction equipment would not exceed Caltrans building damage thresholds at nearby structures. While vibration may be perceptible at times, it would not result in structural damage or excessive groundborne noise levels. Operational activities would not generate groundborne vibration.	No mitigation measures are necessary.	N/A
Population and Housing			
a) Would the project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	**Less Than Significant.** Construction of the Project would result in a temporary increase in employment associated with typical construction activities, which would be accommodated by the existing regional labor force and would not induce permanent population growth. Operation of the Project would allow up to 950 residential units and up to 40,000 square feet of neighborhood-serving commercial uses, resulting in	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	population, housing, and employment growth. However, the scale of growth would be consistent with the City of Oxnard's adopted General Plan, Housing Element, and SCAG Connect SoCal population, housing, and employment forecasts. The Project's population, housing, and employment growth would represent a small fraction of the City's projected growth through 2050 and would not induce substantial unplanned population growth directly or indirectly.		
Public Services and Recreation			
a) Would the project increase demand for fire protection service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?	**Less Than Significant.** The proposed Sub-Neighborhood Plan would result in an incremental increase in population and development that would increase demand for fire protection services. However, the Oxnard Fire Department reviewed the Project and determined that adequate fire protection services could be provided from existing facilities without the need for new or expanded fire stations. The Project would not require construction of new	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	fire protection facilities that could result in environmental impacts.		
b) Would the project increase demand for law enforcement service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?	**Less Than Significant.** The proposed Project would incrementally increase demand for police services due to population growth and new development. The Oxnard Police Department reviewed the Project and determined that existing facilities and staffing levels are sufficient to maintain acceptable response times and service levels. The Project would not require new or expanded police facilities.	No mitigation measures are necessary.	N/A
c) Would the project increase demand for schools such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?	**Less Than Significant.** Development under the proposed Sub-Neighborhood Plan would increase student enrollment within the Rio School District and Oxnard Union High School District. While elementary school enrollment at Rio Rosales Elementary School would exceed current capacity, the increase in students would occur incrementally over time, and school districts have mechanisms, including Senate Bill (SB)-50 fees, to accommodate enrollment growth. The Project would not require	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	construction of new or expanded school facilities that would result in environmental impacts.		
d) Would the project increase the use of existing park facilities such that substantial physical deterioration of the facilities would occur or be accelerated or that new or expanded park facilities would be needed to maintain acceptable service levels?	**Less Than Significant.** The proposed Project would increase population and demand for park facilities; however, it would also include the development of new on-site parks that would exceed the City's parkland service standard. The Project would not result in substantial deterioration of existing park facilities or require new or expanded off-site park facilities.	No mitigation measures are necessary.	N/A
e) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would occur or be accelerated?	**Less Than Significant.** The Project would contribute incrementally to increased use of existing recreational facilities; however, the City's existing inventory of local and regional parks exceeds service level standards. The Project would not cause physical deterioration of neighborhood or regional recreational facilities.	No mitigation measures are necessary.	N/A
f) Does the project include recreational facilities or require the construction or expansion of recreational facilities which	**Less Than Significant.** The proposed Project would include construction of new on-site parks and recreational facilities. The physical environmental effects associated with construction	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

	Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	might have an adverse physical effect on the environment?	and operation of these facilities are addressed as part of the overall Project analysis and would not result in additional or unique environmental impacts.		
g)	**Would the project increase the need for or use of existing library or other community facilities such that substantial physical deterioration of the facilities would occur or be accelerated?**	**Less Than Significant.** The proposed Project would incrementally increase population and demand for library services. However, the increase would be minor relative to existing service levels, and the Project would not result in substantial deterioration of existing library facilities or require construction of new or expanded library facilities.	No mitigation measures are necessary.	N/A
	Transportation and Circulation			
a)	**Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**	**Less Than Significant.** The proposed Sub-Neighborhood Plan would implement an internal circulation network, new roadway connections, enhanced transit access, and expanded bicycle and pedestrian facilities consistent with the City of Oxnard 2030 General Plan, Northeast Community Specific Plan, and Bicycle and Pedestrian Facilities Master Plan. Although several study intersections currently operate at level of service	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	(LOS) D or worse, the addition of Project traffic would not worsen LOS at any intersection compared to existing or cumulative conditions. The Project would improve multimodal connectivity and would not conflict with adopted circulation plans or policies.		
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	**Less Than Significant.** Transportation impacts under CEQA are evaluated based on vehicle miles traveled (VMT) pursuant to SB 743. The Project qualifies for VMT screening as a mixed-use development with locally serving retail uses under 50,000 square feet and residential uses located within a low-VMT area. As a result, the Project would not generate VMT exceeding applicable thresholds and would be consistent with CEQA Guidelines Section 15064.3.	No mitigation measures are necessary.	N/A
c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	**Potentially Significant Impact.** Construction activities could temporarily increase roadway hazards due to lane closures, construction vehicle traffic, and reduced visibility for motorists, bicyclists, and pedestrians. Without construction-related traffic controls,	**MM TRANS-1:** Prior to the start of construction, the applicant shall prepare a Construction Mitigation Plan (CMP) to minimize traffic, circulation, and access disruptions associated with construction activities. The CMP shall be submitted to the City for review and	Less Than Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	these temporary conditions could create safety hazards in the vicinity of the Project Site. Operational roadway design would comply with City standards and would not create long-term traffic hazards.	approval and shall include, at a minimum, the following: <u>Construction Staging and Storage Areas</u> Identification of all construction staging, equipment storage, and material stockpiling areas to ensure they do not obstruct public rights-of-way, bicycle lanes, or pedestrian pathways. <u>Haul Routes</u> Designation of truck haul routes to and from the Project Site that minimize impacts on residential neighborhoods, schools, and other sensitive uses. Haul routes shall be reviewed and approved by the City. <u>Construction Employee Parking Plan</u> Provision of on-site or off-street parking for construction workers to prevent parking spillover onto adjacent streets or surrounding neighborhoods. <u>Traffic Control Measures</u> A traffic control plan prepared in compliance with the California Manual on Uniform Traffic Control Devices (CA-MUTCD), including	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		signage, temporary delineators, flaggers, lane closure procedures, and detour routes for vehicles, pedestrians, and bicyclists, as needed. <u>Pedestrian and Bicycle Safety Measures</u> Measures to maintain or safely reroute pedestrian and bicycle access during construction, including temporary pathways, barriers, and warning signage. <u>Emergency Access</u> Assurance that access for emergency vehicles is maintained at all times. Any temporary lane closures or detours shall be coordinated with the City and local emergency service providers. Implementation of the approved Construction Mitigation Plan shall occur throughout all construction phases. With implementation of the CMP, construction-related traffic hazards and circulation disruptions would be minimized. A traffic operations management plan will be developed for periods of full roadway closure. If construction activities	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		necessitate a complete closure, a detour plan and a traffic operations analysis of affected signalized intersections will be prepared and implemented to minimize the impacts of rerouted traffic.	
d) **Would the project result in inadequate emergency access?**	**Potentially Significant Impact**. During construction, temporary lane closures, construction staging, and increased vehicle activity could interfere with emergency access if not properly managed. Without construction controls, emergency vehicle access could be constrained. Operationally, the Project's circulation system would comply with City standards and provide adequate emergency access.	Refer to **MM TRANS-1,** above.	Less Than Significant
Tribal Cultural Resources			
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the	**Potentially Significant Impact.** Although no known tribal cultural resources have been identified within the Project Site, ground-disturbing activities associated with Project development could encounter previously unidentified tribal cultural resources or Native American human remains within undisturbed native	**MM TCR-1: Native American Monitoring** A Native American monitor shall be invited to be present on-site during ground disturbing activities in the case of unanticipated discovery of potential tribal cultural resources. If previously unidentified cultural resources are encountered during	Less Than Significant

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or** *ii.* ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***	soils. Without protective measures, construction activities could result in a substantial adverse change in the significance of a tribal cultural resource, resulting in a significant impact.	construction within the Project Site, then the archaeologist will have the authority to halt work within 50 feet of the area until the project Native American monitor can assess the find; determine potential significance; and appropriate actions.	

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Utilities and Service Systems			
a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects	**Less Than Significant.** The proposed Sub-Neighborhood Plan would be served by existing City water, wastewater, stormwater, electric, natural gas, and telecommunications systems. Available system capacities are sufficient to accommodate Project-related demand, and development would not require the construction, relocation, or expansion of major utility facilities that could result in environmental impacts.	No mitigation measures are necessary.	N/A
b) Would the project have sufficient water supplies and resources available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	**Less Than Significant.** A Water Supply Assessment prepared for the Project confirms that adequate water supplies are available to serve the proposed development under normal, single-dry, and multiple-dry year conditions. The Project's total water demand would be within the Project Site's groundwater allocation and below the demand assumed in the City's adopted planning documents.	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
c) **Would additional wastewater conveyance or treatment capacity be required to serve project demand and existing commitments?**	**Less Than Significant.** Wastewater generated by the proposed Project would be conveyed to and treated at the Oxnard Wastewater Treatment Plant, which currently operates below permitted capacity. The Project's contribution to wastewater flows would represent a small fraction of available capacity and would not require expansion of conveyance or treatment facilities.	No mitigation measures are necessary.	N/A
d) **Would the project include non-residential wastewater discharges that are subject to local limits and pretreatment requirements?**	**Less Than Significant.** Non-residential uses proposed under the Sub-Neighborhood Plan would generate typical domestic-strength wastewater. These discharges would not require industrial pretreatment or exceed local discharge limits.	No mitigation measures are necessary.	N/A
e) **Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**	**Less Than Significant.** The proposed Project would increase solid waste generation; however, available solid waste collection, transfer, and landfill facilities have sufficient capacity to accommodate Project-generated waste. The Project's contribution would represent a small fraction of regional disposal capacity and would not impair solid waste reduction goals.	No mitigation measures are necessary.	N/A

TABLE ES-1: SUMMARY OF PROJECT IMPACTS, MITIGATION MEASURES, AND LEVEL OF IMPACT AFTER MITIGATION—MAULHARDT-STILES SUB-NEIGHBORHOOD PLAN PROJECT—CITY OF OXNARD

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
f) **Would the project conflict with federal, state, or local management and reduction statutes or regulations related to solid waste?**	**Less Than Significant.** The proposed Project would comply with applicable federal, State, and local solid waste management and reduction regulations, including recycling and organic waste diversion requirements, and would not conflict with adopted solid waste statutes or policies.	No mitigation measures are necessary.	N/A

1.0 INTRODUCTION

This section provides information on the background of the proposed Maulhardt-Stiles Sub-Neighborhood Plan Project; the environmental review process being conducted by the City of Oxnard (City) for the proposed Project; and the organization and content of this Draft Environmental Impact Report (DEIR).

The Maulhardt-Stiles Sub-Neighborhood Plan Project (Sub-Neighborhood Plan or Project) is proposed to implement the City's 2030 General Plan and Northeast Community Specific Plan (NECSP) by regulating development on an approximately 107-acre Project Site located in the NECSP Area, a portion of which was recently developed with the Del Sol High School by the Oxnard Union High School District. The proposed Sub-Neighborhood Plan would allow development of up to 950 residential dwelling units; a maximum of 40,000 square feet of retail and general commercial uses; public parks; and associated vehicular and pedestrian circulation throughfares. These throughfares would be located north and southwest of Del Sol High School in Area B and designed to be compatible with the recently constructed campus. The proposed Project is described further in **Section 2.0**: **Project Description**.

1.1 PURPOSE OF EIR

1.1.1 Project Background

1.1.1.1 City of Oxnard 2030 General Plan

State law requires each county and city to prepare and adopt a comprehensive and long-range general plan for its physical development. The City of Oxnard 2030 General Plan provides the City with a consistent, comprehensive and long-range framework that guides the future development of the City to the year 2030. The General Plan's framework is comprised of the following elements: Sustainable Community, Community Development, Infrastructure and Community Services, Environmental Resources, Safety and Hazards, Military Compatibility, and Housing. The information below relates to the General Plan and proposed Project.

The City 2030 General Plan has four major themes, including the development or reinvestment in land within the City Urban Restriction Boundary (CURB) with an "urban village" concept. Urban villages incorporate private and public redevelopment, mixed land uses, affordable and workforce housing, and transit connectivity as a key strategy for meeting greenhouse gas (GHG) emission reduction targets and implements the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (also known as Connect SoCal 2024) as required by Senate Bill (SB) 375. As detailed in General Plan Goal CD-7, six areas within the City, including the Project Site (referred to as East Village Phase III) are designated as urban villages. The Project Site is referred to in the General Plan Land Use Element as an unincorporated "island;"

the last largely undeveloped area within the City limits providing an opportunity to accommodate private and public uses needed in the NECSP Area.

The City's 2021–2029 Housing Element states that the City is growing at an average of four percent each year, with a projected population of approximately 238,100 by 2045. Under existing conditions, many residents are experiencing an increase in overpayment of rent and a decrease in home ownership. The City is facing a shortage of housing needs for all socioeconomic groups.[1]

As described above, the Project Site is the last largely undeveloped area in the City capable of accommodating private and public uses to the Northeast Community. The designation of the Project Site as an urban village facilitates the development of a distinct mixed-use neighborhood including uses such as residential, commercial, parks, schools and pedestrian facilities. It could also support diverse housing options, including affordable housing, helping to reduce vehicle trips near major employment centers, expand the housing supply, and improve connectivity between previously inaccessible areas of the City. As a result, developing the Project Site would not only help alleviate the housing shortage but also foster a well-integrated and distinctive neighborhood that would further connect the areas surrounding the Project Site.

1.1.1.2 Northeast Community Specific Plan (NECSP)

The Project Site is located within the NECSP area, which was adopted in 1993 to guide the orderly growth and development of a portion of the Northeast Community in the City, in a manner consistent with the General Plan. The goals of the NECSP include developing public and semi-public facilities (schools, parks, and medical center) into livable residential neighborhoods; developing additional housing in the area due to proximity of the Northeast Industrial Area (NIAD) which is a major employment generator; developing pedestrian and resident-friendly neighborhoods which diminish reliance on private vehicles and particularly provides safe environments for children and all residents; blending development with adjacent communities; and providing a variety of housing options for all socioeconomic groups, with more affordable housing.[2]

The NECSP authorizes the adoption of Sub-Neighborhood Plans to create distinctive neighborhoods that meet the goals and objectives of the NECSP. Sub-Neighborhood Plans, 80 acres or greater in size, include public spaces, such as schools, parks, bicycle lanes and pedestrian pathways other than sidewalks, and provide benefits to the City with a mixture of residential and commercial uses. Sub-Neighborhood Plans are to be based on the City's "Vision for a More Livable Community" and

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1 City of Oxnard. *2021–2029 Housing Element*. Adopted October 4, 2022. Accessed August 2024. https://www.oxnard.gov/wp-content/uploads/Oxnard-Housing-Element_October-2022_Clean_Reduced.pdf.

2 City of Oxnard. *Northeast Community Specific Plan*. December 1993. Accessed August 2024. https://www.oxnard.gov/wp-content/uploads/NECSP3.pdf.

may include modified development standards. Sub-Neighborhood Plans are adopted as amendments to the NECSP.[3]

1.1.1.3 East Village Phase III Annexation

The Project Site, also referred to as the East Village Phase III Project, was annexed to the City of Oxnard and Calleguas Municipal Water District in 2014. The City prepared the East Village Phase III Annexation EIR for this project which evaluated the development of residential and commercial uses on the Project Site consisting of 402 single-family residential units, 78,400 square-feet of commercial, and 11 acres of parks and streets. The Oxnard City Council approved pre-zoning[4] as part of the approval of the Northeast Community Specific Plan and a resolution of intent to annex the Project Site in June 2013. The Ventura Local Agency Formation Commission approved the annexation of the Project Site to the City of Oxnard and Calleguas Municipal Water District in February 2014, and the annexation was recorded in April 2014. Mitigation identified in the East Village Phase III EIR is incorporated in this document when/where applicable.

1.1.1.4 Oxnard Union High School District Del Sol High School

The Oxnard Union High School District (OUHSD) proposed Del Sol High School in the central portion of the Project Site. In 2019, OUHSD prepared and certified an EIR for the New High School No. 8 Project (SCH #2019029101), also known as the Del Sol High School EIR. Del Sol High School opened in 2023 with an inaugural freshman class and is implementing a phased enrollment plan, adding one grade level each academic year. The school is expected to operate as a fully enrolled grades 9–12 high school by 2026–2027 academic year.

1.2 ENVIRONMENTAL REVIEW PROCESS

Project implementation requires the approval of discretionary actions by the City. Therefore, in accordance with Public Resources Code (PRC) Section 21080, the proposed Project is subject to environmental review under the California Environmental Quality Act (CEQA).

In accordance with PRC 21002.1 and CEQA Guidelines Section 15121(a), this EIR is an informational document prepared to: (1) inform public agency decision makers and the public of the significant environmental effects of the Project; (2) identify possible ways to minimize the significant effects; and (3) identify and evaluate reasonable alternatives to the Project.

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3 City of Oxnard. *Northeast Community Specific Plan*.

4 California Government Code Section 65859 allows cities to pre-zone unincorporated territory to establish the zoning that will apply upon annexation. Pre-zoning enables a city to adopt zoning regulations for an area prior to its incorporation into the city and takes effect concurrently with annexation.

This Draft EIR has been prepared in conformance with CEQA Statute (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines. Section 15151 of the State CEQA Guidelines defines the standards for EIR adequacy as follows:

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

This Draft EIR is a Project EIR as defined in Section 15161 of the State CEQA Guidelines primarily focusing on changes in the environment that would result from the development of a project and examine all phases of a project, including planning, construction, and operation.

1.2.1 Scoping Process

In accordance with Section 15063(a) of the CEQA Guidelines, the City prepared an Initial Study to evaluate the potential environmental effects of the Project.

The Initial Study determined that preparation of an EIR was required to evaluate the potential for significant impacts related to the following environmental topics from the City's CEQA Guidelines, which contain specific topics/thresholds:

- Aesthetics and Urban Design
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation and Circulation
- Tribal Cultural Resources
- Utilities

The City determined through the preliminary analysis in the Initial Study that the proposed Project does not have the potential to result in significant impacts related to Wildfire. For this reason, this topic is not evaluated in detail in this Draft EIR.

After determining that an EIR should be prepared, the City prepared and circulated a Notice of Preparation (NOP) on February 13, 2025, for review by other public agencies and interested parties. The Initial Study is contained in **Appendix A** and the NOP and NOP responses are contained in **Appendix B** of this Draft EIR.

1.2.2 Draft Environmental Impact Report Review and Comment

CEQA requires that the Lead Agency provide the public and other public agencies with the opportunity to review and comment on the Draft EIR. The City is providing a 45-day period for review and comment on this Draft EIR, starting *May 7*, 2026, and ending *June 22*, 2026.

Copies of this Draft EIR have been sent to the State Clearinghouse, responsible agencies, other public agencies, and to all interested parties that have requested notice and copies of the Draft EIR.

The Draft EIR is also available for review at the following locations:

- City of Oxnard, Planning Division Community Development Department – 214 South C Street, Oxnard, California 93030
- Oxnard Public Library – 251 South 'A' Street, Oxnard, California 93030

In addition, the Draft EIR is available on the City's website at:

> https://www.oxnard.gov/community-development/planning-environmental-services/environmental-postings

Written comments on the Draft EIR may be submitted to:

City of Oxnard
Planning Division
214 South C Street
Oxnard, California 93030
Attention: Joe Pearson II, AICP, Planning and Environmental Services Manager

Agency responses should include the name of a contact person within the commenting agency.

After the public review and comment period, written responses to all comments pertaining to environmental issues will be prepared and incorporated as part of the Final EIR. As required by CEQA, responses to comments submitted by responsible public agencies will be distributed to those agencies for review 10 days prior to consideration of the Final EIR by the appropriate decision-making body. Upon completion of the Final EIR and other required documentation, the appropriate decision-making body will consider certification of the EIR and approval of the proposed Project.

1.3 ORGANIZATION OF THE EIR

A description of the organization of this EIR and the content of each section is provided below. The Draft EIR is organized as follows:

- **Executive Summary** presents a concise summary of the environmental information, analysis, and conclusions in this EIR.

- **Section 1.0: Introduction** provides information on the background of the proposed Project, the environmental review process, and organization of the Draft EIR.
- **Section 2.0: Project Description** presents a description of the proposed Project, which addresses the location of the Project, the objectives of the proposed Project, the characteristics of the proposed Project, and the approvals being requested from the City.
- **Section 3.0: Environmental Setting** describes the existing physical setting of the Project Site and the surrounding area.
- **Section 4.0: Environmental Impact Analysis** contains information and analysis of the potential for the proposed Project to result in significant environmental effects for each of the topics evaluated in this EIR.
- **Section 5.0: Other CEQA Considerations** contains a discussion of other topics required by the CEQA Guidelines to be included in an EIR, including the potential for the proposed Project to induce additional growth and a discussion of any potential, significant irreversible environmental changes that could result from the proposed Project.
- **Section 6.0: Alternatives** discusses alternatives to the proposed Project that have been developed and analyzed to provide additional information on ways to avoid or lessen the impacts of the proposed Project.
- **Section 7.0: References** lists the principal documents, reports, maps, and other information sources referenced in this EIR.
- **Section 8.0: Report Preparers** lists persons involved in the preparation of this Draft EIR or who contributed information incorporated into this Draft EIR.
- **Appendices** to this EIR include technical information and other materials prepared for this EIR, as well as the City's environmental review of this proposed Project.

2.0 PROJECT DESCRIPTION

This section of the Draft Environmental Impact Report (Draft EIR) describes the location, objectives, and the design and environmental characteristics of the proposed Maulhardt-Stiles Sub-Neighborhood Plan Project[1] (Project) and the intended uses of this EIR, as required by the California Environmental Quality Act (CEQA) Guidelines.[2] The background of the Project is also discussed.

2.1 PROJECT LOCATION

The City of Oxnard (City) encompasses approximately 26.9 square miles and is situated roughly midway between the Santa Barbara County and Los Angeles County as shown in **Figure 2-1: Regional Location**. The City is bounded by the Santa Clara River and unincorporated Ventura County to the north, unincorporated Ventura County areas to the east, and the City of Port Hueneme and the Pacific Ocean to the south and west, respectively.

The approximately 107-acre Project Site is located within the East Village neighborhood in the Northeast Community Specific Plan (NECSP) Area in the City of Oxnard as shown in **Figure 2-2: Project Site Location.** The Project Site is bounded to the north by Cesar Chavez Drive, to the east by Gibraltar Street and East Village Park, to the south by Camino Del Sol, and to the west by North Rose Avenue (Assessor Parcel Numbers [APNs] 214-0-020-615, -625, and -635)**.** The northern portion of the Project Site consists of undeveloped land, previously disturbed by agricultural use; the central and southeastern portions of the Project Site consist of the Del Sol High School, opened by Oxnard Union High School District (OUHSD) in July 2023; and the southwestern portion of the Project Site consists of the Maulhardt family residence, barn, cottages, outbuildings, other agricultural structures, and a fallowed lemon orchard.

The development surrounding the Project Site and their corresponding land use and zoning designations are described in **Section 3.0: Environmental Setting**.

2.2 PROJECT BACKGROUND

Development of the Project Site has been evaluated in several prior Environmental Impact Reports (EIRs).

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1 The City of Oxnard Northeast Community Specific Plan (NECSP) defines the intent and purpose of "sub-neighborhood" plans in Section 10.1 of the NECSP as plans for subareas within the NECSP area wherein the development standards applicable elsewhere in the NECSP are modified to create distinctive neighborhoods that meet the goals and objectives of the NECSP.

2 California Code of Regulation. Title 14, Section 15000 et seq.

2.2.1 Northeast Community Specific Plan EIR

The City prepared and certified a Program EIR for the Northeast Community Specific Plan (SCH# 1991041008) in 1992. The NECSP planned to develop the Project Site with Low Density Residential (4.5 dwelling units per acre) and Neighborhood Commercial.

2.2.2 City of Oxnard 2030 General Plan EIR

Development of the site was also evaluated in the Program EIR the City prepared and certified for 2030 General Plan (SCH# 2007041024) in 2011. The General Plan designed the Project Site to be developed with Residential Low Medium (RLM), Commercial General (CG) and Park (PRK) uses. Urban villages incorporate private and public redevelopment, mixed land uses, affordable and workforce housing, and transit connectivity as a key strategy for meeting greenhouse gas (GHG) emission reduction targets and implements the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (also known as Connect SoCal 2024) as required by Senate Bill (SB) 375. As detailed in General Plan Goal CD-7, six areas within the City, including the Project Site (referred to as East Village Phase III) are designated as urban villages. The Project Site is referred to in the General Plan Land Use Element as an unincorporated "island;" the last largely undeveloped area within the City limits providing an opportunity to accommodate private and public uses needed in the NECSP Area.

2.2.3 East Village Phase III Annexation EIR

The City prepared and certified a Project EIR for the East Village Phase III Annexation Project (SCH# 2011031024) in 2013. The East Village Phase III Annexation Project EIR analyzed the uses allowed by the NECSP on the Project Site including 402 single-family homes on 89.5 acres, a 6-acre neighborhood commercial center containing 78,400 square feet (sf) and 11 acres of parks and streets.

2.2.4 New High School No. 8 Project EIR

In 2019, OUHSD prepared and certified a Project EIR for the New High School No. 8 Project (SCH #2019029101) (Del Sol High School EIR) which allowed the development of Del Sol High School within the central and southwest portion of the Project Site.

2.3 PROJECT OBJECTIVES

As detailed below, the proposed Project would develop a Sub-Neighborhood Plan that would guide the future development of the Project Site with uses consistent with the City of Oxnard 2030 General Plan (General Plan) and NECSP. The objectives of the proposed Project include the following:

1. Implement General Plan Policy CD-7.1 by developing a walkable, infill 'urban village' at the project site, complete with a mixture of housing typologies, land uses, and multiple transportation/circulation options.



SOURCE: Google Earth – 2025

FIGURE **2-1**

Meridian Consultants

Regional Location Map

408-001-24



SOURCE: Google Earth – 2025

FIGURE **2-2**

Meridian Consultants

Project Site Location

408-001-24

2. Provide neighborhood-serving commercial uses to meet the daily needs of residents, reduce reliance on automobile travel, and generate additional retail sales tax revenue for the City.
3. Enhance existing parks and create new park spaces by providing approximately 12.90 acres of new parks and open space, including an approximate 5.3-acre expansion of the existing East Village Park.
4. Maximize residential development potential of the site within the parameters of the available water allocation for the site, the NECSP, and the General Plan, in order to provide much needed housing for all income segments.
5. Provide ample opportunities for low income and workforce housing by ensuring 15% of housing stock provided by the Project is affordable based on sale developments and rent/leased developments:
    a. For sale developments:
        i. Minimum 15% Low Income (or more affordable level)
    b. For rent/leased developments:
        i. Minimum 5% Very Low Income (or more affordable level)
        ii. Minimum 10% Low Income (or more affordable level)
6. Create a neighborhood in alignment with the City's "Vision for a More Livable Community" by providing a broad range of housing typologies, an array of greens and park spaces, human scaled streetscapes, active building frontages that are oriented towards the street via utilization of porches, storefronts, and dooryards, and robust pedestrian and bicycle infrastructure.
7. Ensure that structures and the broader built environment within the community are of high quality, are aesthetically pleasing, and in alignment with the community's vision by developing and enforcing stringent architectural and building design standards.

2.4 PROJECT CHARACTERISTICS

2.4.1 Sub-Neighborhood Plan

The proposed Sub-Neighborhood Plan (**Appendix C**) would regulate the development of up to 950 residential dwelling units, a maximum of 40,000 sf of retail and general commercial space, parks, streets and pedestrian facilities within the approximately 107-acre Project Site. The Sub-Neighborhood Plan identifies three Planning Areas within the Project Site as defined in this document—Area A, Area B, and Area C.

Figure 2-3: Illustrative Plan depicts the general types and location of the uses that would be allowed by the Sub-Neighborhood Plan. The intent of the Planning Areas is to designate specific types of development in Area A and Area C, complementing the existing Del Sol High School in Area B. The Project would provide 15% of the total residential units as low income.

The proposed Project also includes approval of a Tentative Tract Map (TTM) (**Appendix D**), which would subdivide the approximately 107-acre Project Site into individual lots for residential, commercial, park, and infrastructure uses consistent with the Sub-Neighborhood Plan. The TTM establishes the overall lot configuration, circulation framework, and development blocks that would guide future site development. The TTM would create master lots within Areas A and C, allowing for phased development of the Project Site in accordance with the permitted land uses, densities, and development standards established by the Sub-Neighborhood Plan. Subsequent development within each lot would occur consistent with the TTM and applicable City approvals.

Figure 2-4: Unit Allocation Plan defines the minimum and maximum number of residential dwelling units that would be allowed within the 13 master lots the proposed TTM would create within the Project Site. Each lot could be developed within these ranges provided that the total number of residential units does not exceed 950 units. This EIR will evaluate the environmental impacts based on the maximum development scenario to ensure a comprehensive and conservative analysis of potential effects.

Figure 2-5: Maximum Development Scenario provides a detailed breakdown of the proposed land uses by master lot and **Table 2-1: Maximum Development Scenario Land Use Summary** provides the breakdown of proposed land uses by Planning Area based on the maximum development intensity of 950 residential units and 40,000 sf of commercial space.

TABLE 2-1: MAXIMUM DEVELOPMENT SCENARIO LAND USE SUMMARY

Land Use	Maximum Permitted		
	Acres	Dwelling Units	Gross Square Feet
Area A: North Neighborhood			
Residential	20.52	656	–
Commercial	–	–	37,000
Parks/Open Space	11.40	–	–
Roadways/Circulation	12.61	–	–
Area B: Del Sol High School			
Existing Public High School	50.7	–	–
Area C: Southwest Neighborhood			
Residential	6.88	294	–
Commercial	–	–	3,000
Parks/Open Space	1.50	–	–
Roadways/Circulation	3.49	–	–

Source: Sargent Town Planning, 2024.

2.4.2 Zones and Overlays

Sub-Neighborhood Plans are intended to have development standards modified to create distinctive neighborhoods that meet the goals and objectives of the NECSP and are adopted as amendments to the NECSP.[3] Therefore, the proposed Project would include two regulating zones and two overlay zones that would guide the future development of the Project Site. The regulating zones and overlay zones are detailed below as shown in **Figure 2-6: Regulating Plan**.

Open Zone: The Open Zone is intended to accommodate the entire range of allowable building types within the Sub-Neighborhood Plan. Multiple building types and uses may occur within a single project, resulting in a mix of uses and building forms. It is the only zone in which Podiums[4] are allowed. Larger buildings, or portions of buildings which front the Neighborhood Zone, as described below, are scaled down - both vertically and horizontally - to create streets with consistent and coherent building patterns. Buildings are close to the public right of way, with active frontages and conspicuous entrances. Sidewalks are wide, and streets are lined with trees.

Commercial Overlay: The Commercial Overlay is established within the Open Zone. More specifically, the northwest corner of Area A from North Rose Avenue eastward to the southern extension of Concha Street, and from Cesar Chavez Drive southward 300 feet (ft). The Commercial Overlay, with its exposure to high volumes of traffic, is intended to enable concentrations of commercial uses that exceed 1,000 sf. Other building types and uses are also allowed in this Overlay, which may result in a mixed-use development that may include commercial and residential development.

Neighborhood Zone: The Neighborhood Zone consists of residential scale buildings which contain primarily residential uses. Buildings have active frontages, such as porches, stoops, and dooryards. Garages are typically at the rear of each lot, but where in front, they do not visually dominate. Streets are tree-lined with wide sidewalks. Alleys allow for streets of uninterrupted active transportation for pedestrians and bicyclists.

Edge Overlay: The Edge Overlay is established within the Neighborhood Zone along Cesar Chavez Drive and Gibraltar Street. The Edge Overlay is intended to ensure that new development is compatible with existing development across the streets by ensuring that the height of the proposed buildings in this area is consistent with the one- to two-story homes along Cesar Chavez Drive and Gibraltar Street.

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3 City of Oxnard. *Northeast Community Specific Plan*. December 1993. Accessed August 2024. https://www.oxnard.gov/wp-content/uploads/NECSP3.pdf.

4 Podium buildings are large-footprint, multi-unit buildings that sit atop a concrete parking level. The ground-floor parking area is lined with residential or commercial uses and frontages. On-site open space is provided on the parking lid in the form of courts, walkways, and amenities like pools or playgrounds.

Table 2-2: Maximum Building Stories, details the allowed number of stories within each of the zones and overlays for each of the different building types, further discussed below.

TABLE 2-2: MAXIMUM BUILDING STORIES				
Building Type	**Open**	**Commercial**	**Neighborhood**	**Edge**
House	3	3	2.5	2.5
Side Yard House	3	3	2.5	2.5
Rowhouse	3	3	2.5	2.5
Multiplex	3	3	2.5	2.5
Walk-up	4	4	2.5	2.5
Podium	4	4	N/A	N/A
Commercial Building	4	4	N/A	N/A
Outbuilding[1]	2	2	2	2

Notes:

[1] Only allowed on House lots.

Source: Sargeant Town Planning, 2024.

2.4.3 Planning Areas and Land Use Overview

Development allowed within each Planning Area under the proposed Sub-Neighborhood Plan is described below. **Figure 3-1: Planning Areas Within the Project Site** in **Section 3.0: Environmental Setting**, depicts Areas A-C within the Project Site.

2.4.3.1 Area A: North Neighborhood

The North Neighborhood contains a modified traditional "grid" street network to enhance connectivity between existing and proposed neighborhoods and promote walkability. This neighborhood is planned around two proposed public park spaces: the West Green, an approximately 1.15-acre neighborhood serving gathering space; and the East Village Park Extension, an approximately 5.3-acre expansion of the existing East Village Park intended to serve as a park for the wider northeast Oxnard community. Additional parks and open spaces are provided in the form of multiple publicly and privately owned parks and paseos. All privately owned park spaces would have a blanket access easement to permit public ingress, egress, and utilization of said lands for recreation purposes. In addition to these park and open space areas, a 10-foot-wide multi-purpose pathway and linear park is proposed along the eastern side of Rose Avenue and northern side of Jacinto Drive to provide a dedicated pedestrian and bicycle route separated from vehicular traffic.

A **General Neighborhood Fabric:** *A human-scale network of streets and blocks make a new, walkable neighborhood.*

B **West Green:** *A neighborhood-serving gathering space near the heart of the North Neighborhood.*

C **East Village Park extension:** *A westward expansion of the existing East Village Park, serving the wider community.*

D **High School:** *A campus including school buildings and athletic fields, some of which will provide public access.*

E **Rose Avenue Improvements:** *In addition to streetscape improvements, Rose Avenue will have a tree-lined multi-use path which ties together its residential, commercial, and high school frontage.*

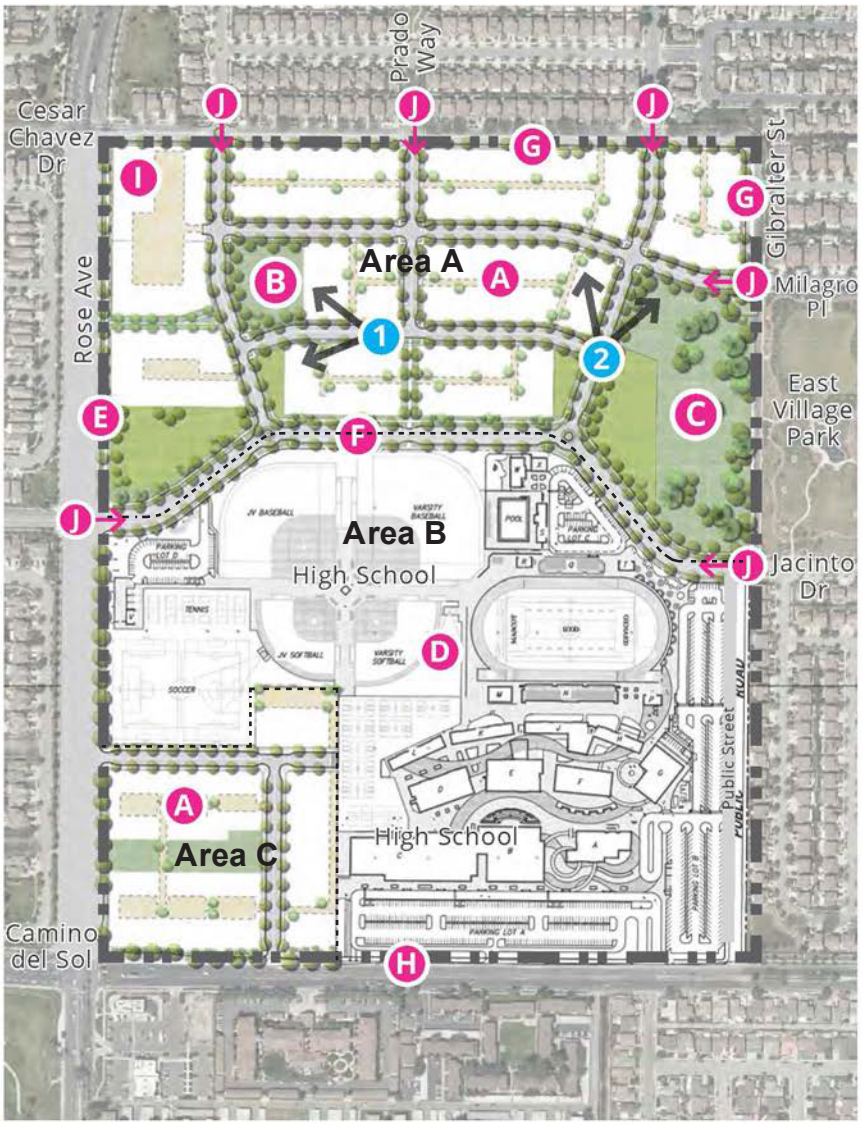
F **Jacinto Drive:** *A comfortable walking and biking connection between Rose Ave, East Village Park, the neighborhoods, and the school.*

G **Neighborhood Edge:** *New housing will transition seamlessly to the existing neighborhoods along Cesar Chavez Dr and Gibralter St.*

H **Camino del Sol:** *Pedestrian and bicycle improvements connecting to Del Norte Blvd to the east and central Oxnard to the west.*

I **Commercial Opportunity:** *Potential for a limited amount of commercial use accessible to the community by multiple modes of transportation.*

J **Neighborhood Connections:** *Calm neighborhood streets form a connected, walkable, bikable network with existing neighborhoods.*



SOURCE: Sargent Town Planning – 2025

FIGURE **2-3**

Meridian Consultants

Illustrative Plan

408-001-24



Master Lot numbers are shown in red.

0 50 100 200

APPROXIMATE SCALE IN FEET

SOURCE: Sargent Town Planning – 2025

FIGURE **2-4**

Meridian Consultants

Unit Allocation Plan

408-001-24

Illustrative Plan: Schematic allocation of building types



Units by Lot

Building Type	Code	Density [3]	Lot 1 3.53 acres Mix	Area	Units	Lot 2 1.74 acres Mix	Area	Units	Lot 3 2.4 acres Mix	Area	Units	Lot 4 1.47 acres Mix	Area	Units	Lot 5 1.64 acres Mix	Area	Units	Lot 6 1.89 acres Mix	Area	Units
A House	§2.6.3	6 to 10																		
B Side YardHouse	§2.6.4	10 to 13																		
C Rowhouse	§2.6.5	16 to 24																		
D **Multiplex**	§2.6.6	20 to 35							70%	1.68	48									
E **Walk-up**	§2.6.7	30 to 40							30%	0.72	24	100%	1.47	49	100%	1.64	55	100%	1.89	64
F Podium	§2.6.8	30 to 45	100%	3.53	134	100%	1.74	66												
G Outbuilding	§2.6.10	1 per house		N/A			N/A			N/A			N/A			N/A			N/A	
TOTAL DWELLINGS:					134			66			72			49			55			64
H CommercialBuilding (SF)	§2.6.9	.3 to .4 FAR	Note 1		8,000	Note 1		20,000	Note 4		1,000	Note 4		2,000	Note 4		2,000	Note 4		2,000
TOTAL COMMERCIAL:					8,000			20,000			1000			2000			2000			2000

(Cont.)

Building Type	Code	Density [3]	Lot 7 2.83 acres Mix	Area	Units	Lot 8 3.18 acres Mix	Area	Units	Lot 9 1.85 acres Mix	Area	Units	Lot 10 2. acres Mix	Area	Units	Lot 11 .99 acres Mix	Area	Units	Lot 12 1.78 acres Mix	Area	Units
A House	§2.6.3	6 to 10																		
B Side YardHouse	§2.6.4	10 to 13																		
C Rowhouse	§2.6.5	16 to 24																		
D **Multiplex**	§2.6.6	20 to 35				100%	3.18	76	100%	1.85	44									
E **Walk-up**	§2.6.7	30 to 40	100%	2.83	96										100%	0.99	45	100%	1.78	63
F Podium	§2.6.8	30 to 45										100%	2.00	92						
G Outbuilding	§2.6.10	1 per house		N/A			N/A			N/A			N/A			N/A			N/A	
TOTAL DWELLINGS:					96			76			44			92			45			63
H CommercialBuilding (SF)	§2.6.9	.3 to .4 FAR	Note 4		2,000							Note 4		1,000						
TOTAL COMMERCIAL:					2000			0			0			1000			0			0

(Cont.)

Building Type	Code	Density [3]	Lot 13 2.11 acres Mix	Area	Units	TOTAL 27.4 acres Mix	Area	Units
A House	§2.6.3	6 to 10						
B Side YardHouse	§2.6.4	10 to 13						
C Rowhouse	§2.6.5	16 to 24						
D **Multiplex**	§2.6.6	20 to 35				33.6%	6.70	168
E **Walk-up**	§2.6.7	30 to 40				79.2%	11.31	396
F Podium	§2.6.8	30 to 45	100%	2.11	94	77.2%	9.38	386
G Outbuilding	§2.6.10	1 per house		N/A		N/A		
TOTAL DWELLINGS:					94	DU:		950
H CommercialBuilding (SF)	§2.6.9	.3 to .4 FAR	Note 4		2,000			
TOTAL COMMERCIAL:					2000	Comm. SF:		40,000

Notes:

1. In this scenario, commercial space is included within a mixed use podium project spanning Lots 1 and 2.
2. Lot numbers are in black in the Illustrative Plan.
3. Density is expressed in dwelling units per acre (dua) unless otherwise noted. As the shape and size of each Lot differs, each Lot achieves a slightly different density within this range.
4. Corner commercial (1,000 SF each) by open spaces; may be located within a residential building.

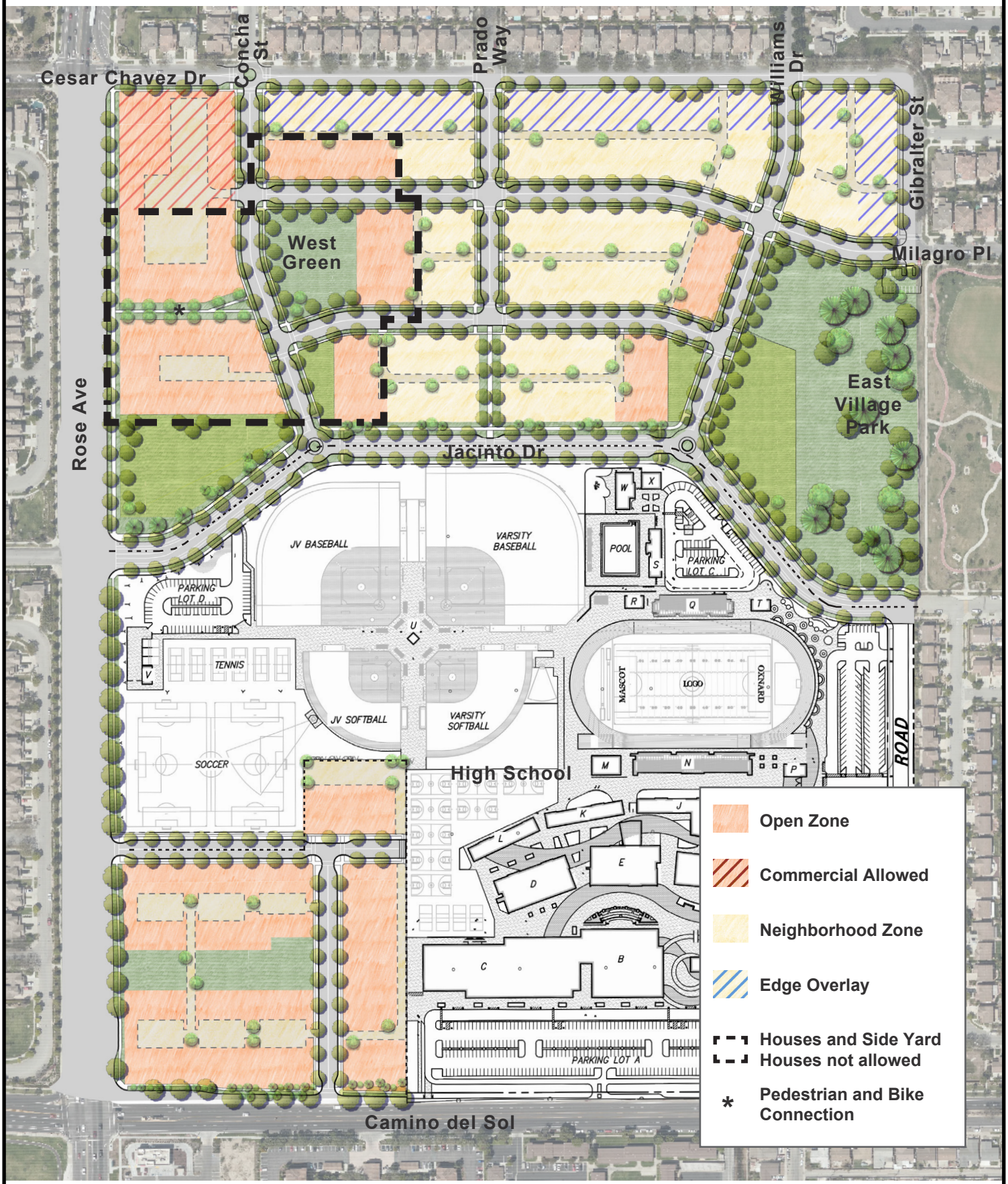
SOURCE: Sargeant Town Planning - 2025

FIGURE **2-5**

Meridian Consultants

Maximum Development Scenario

408-001-24



SOURCE: Sargent Town Planning– 2025

FIGURE **2-6**

Meridian Consultants

Regulating Plan

408-001-24

A broad array of residential types would be allowed in the North Neighborhood with a maximum of 950 dwelling units and 40,000 sf of neighborhood commercial uses when combined with the residential units and commercial uses in Area C. Development would be regulated by two zones and two overlay zones in conjunction with the form-based code building and design standards in the Sub-Neighborhood Plan.

Generally, the allowed residential density is greatest on the westerly portion of the North Neighborhood, with a proposed concentration of the higher density residential uses oriented around the West Green and Rose Avenue. This area has a proposed Sub-Neighborhood land use designation of 'Open'. Permitted residential types include single-family homes, rowhouses, multiplexes, walk-up apartments, and podium multi-family structures, not to exceed four stories in height. The proposed Project identifies and allows retail commercial uses at the intersection of Rose Avenue and Cesar Chavez Drive, which may be mixed with residential land uses to create a mixed-use development. Limited commercial opportunities are also permitted throughout the remainder of the North Neighborhood, with commercial/retail uses permitted on corner lots adjacent to parks.

Lower residential densities would be allowed at the north and east of the North Neighborhood with the proposed land use designation of 'Neighborhood'. This designation allows "house-scaled" single family homes, rowhouses, and multiplexes with a maximum height of 2.5 stories to have a similar height with the adjacent residences.

2.4.3.2 Area B: High School

Planning Area B includes the existing Del Sol High School, serving students from grades 9–12. The campus opened to students in Fall 2023. In 2019, OUHSD prepared and certified a Project EIR for the New High School No. 8 Project (SCH #2019029101) (Del Sol High School EIR). This Planning Area is excluded from the scope of the EIR analysis and is considered part of the baseline environmental conditions. Refer to **Section 3.0: Environmental Setting**, which describes the existing development within this area.

2.4.3.3 Area C: Southwest Neighborhood

The proposed Southwest Neighborhood, bounded by the major thoroughfares of Camino Del Sol to the south and Rose Avenue to the west, and the existing Del Sol High School to the north and east, would contain two new streets along the northern and eastern portion of the site. The intent is to create a pedestrian-oriented pattern of walkable blocks and integrate this neighborhood with the existing intersection of Camino Del Sol and Rose Avenue. The center of this small neighborhood is the Central Green, a 1.02-acre public park that extends from Rose Avenue to the west to a proposed new street to the east, intended to serve as a gathering place and additional west-east pedestrian connection through the neighborhood. Additional parks and open spaces are proposed in the Southwest Neighborhood in the form of multiple publicly and privately owned parks and paseos. All privately owned park spaces would have a proposed blanket access easement to permit public ingress, egress, and utilization of said lands for recreation purposes.

Development in this neighborhood would consist of predominately multi-family residential buildings with a maximum of 950 dwelling units and 40,000 sf of neighborhood commercial uses when combined with the residential units and commercial uses in Area A. All land available for development in the Southwest Neighborhood is designated 'Open'. This designation allows single-family homes, rowhouses, multiplexes, walk-up apartments, and podium multi-family buildings, not to exceed four stories in height.

2.5 ALLOWED USES

2.5.1 Residential Unit Types

As detailed above, the Sub-Neighborhood Plan would allow the development of a variety of residential unit types characterized as house, side yard house, rowhouse, multiplex, walk-up and podium. The Project would provide 15% of the total residential units as housing consisting of 5% for very low income and 10% for low income. The information below provides specific information for each of the residential unit types. Refer to **Figures 2-7** to **2-15** that depict each residential unit type with corresponding minimum lot size, net density, typical unit size, and parking arrangement.

2.5.1.1 Type A: House

The house residential unit type has three versions—V1: Single-Family Wide Lot No Alley, V2: Single-Family Wide Lot with Accessory Dwelling Unit (ADU) Over Garage, and V3: Single-Family Narrow Lot with Rear Yard and Detached Garage.

The V1 residential unit type would have a minimum lot size of 55 ft x 90 ft, allow six to eight dwelling units per acre (du/ac), a typical unit size of 2,750 sf, and would have attached garages in the front of the house accessed by a driveway from the front street. This house type is common in the area and is found along the north side of Cesar Chavez Drive. It provides a front entry with porches and small dooryards. It also has a front driveway occupying much of the street frontage with parking and parking access.

The V2 house residential type would have a minimum lot size of 55 ft x 100 ft, allow six to eight du/ac, a typical unit size of 3,250 sf, and would have a detached garage accessed from the alley. This house type provides alley access to the garage so the home can face the street with dooryards and/or porches, providing a welcoming entry and more street parking for visitors since there is no garage curb cut on the street. It also provides the opportunity to have an ADU over the garage.

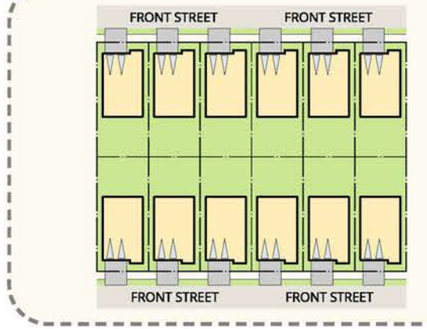
The V3 house residential type would have a minimum lot size of 35 ft x 100 ft, allow eight to 10 du/ac, a typical unit size of 2,250 sf, and would have two parking spaces per DU in a detached garage in the alley. The V3 residential unit type would be similar to the V2 residential unit type but the lot is narrower, increasing density and the frequency of front doors on the street.

Type A: House

V1: Single Family Wide Lot No Alley

SUMMARY

Lot (minimum)	55' X 90'
Net Density (typ.)	6–8 DU/Acre
Typical Unit Size	2,750 SF
Parking Arrangement	Attached garage in the front of the house accessed by a driveway from the front street



Intent: This house type is common in the area and is found along the north side of Cesar Chavez Dr. It provides a front entry with porches and small dooryards, but it also has a front driveway occupying much of the street frontage with parking and parking access.

PRECEDENT IMAGES



The garage is set back relative to the front entry and baloncy.



Example from Cesar Chavez Drive

3D VIEW



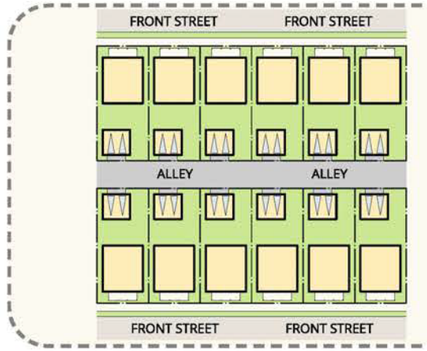
Type A: House

V2: Single Family Wide Lot with ADU over Garage

SUMMARY

Lot (minimum)	55' X 100'
Net Density (typ.)	6–8 DU/Acre
Typical Unit Size	3,250 SF (including 500 SF for ADU)
Parking Arrangement	Detached garage accessed from the alley

Intent: This type provides alley access to the garage so the home can face the street with dooryards and/or porches, providing a welcoming entry and more street parking for visitors since there is no garage curb cut on the street. It also provides the opportunity to have an accessory dwelling unit (ADU) over the garage.



PRECEDENT IMAGES



Without driveways, dooryards become useful and beautiful.



The rear garage allows living spaces to look over the street.

3D VIEW



SOURCE: Sargent Town Planning – 2025

FIGURE **2-7**

Residential Unit Type A: House

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408-001-24

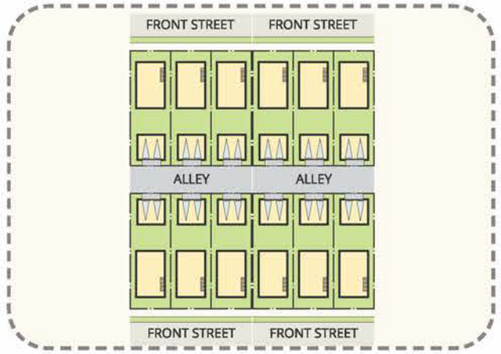
Type A: House

V3: Single Family Narrow Lot with Rear Yard and Detached Garage

SUMMARY

Lot (minimum)	35' X 100'
Net Density (typ.)	8–10 DU/Acre
Typical Unit Size	2,250 SF
Parking Arrangement	Detached garage on alley
Parking Ratio	2 spaces per DU

Intent: This house type is similar to V2 but the lot is narrower, increasing density and the frequency of front doors on the street. It faces the street with dooryards and/or porches, providing a welcoming entry, more street parking for visitors since there is no garage curb cut, and high levels of neighborly charm and curb appeal by not devoting over half of the front yard to parking. A private rear yard is provided between the house and detached garage, with access to and from the alley beside the garage.



PRECEDENT IMAGES



Example from Cal State Channel Islands faculty housing



Example from Hercules Waterfront

3D VIEW

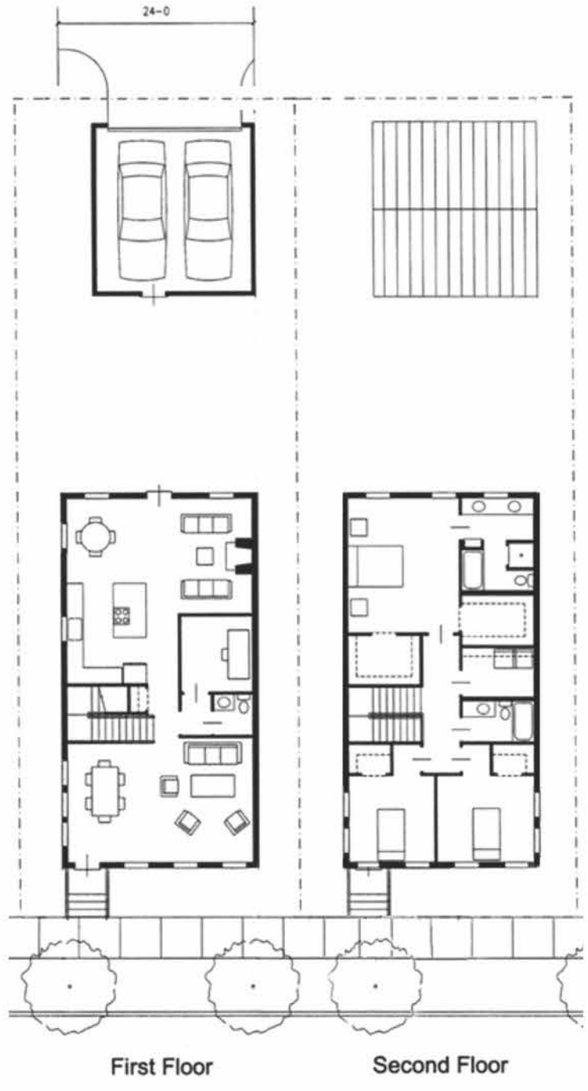


Type A: House

V3: Single Family Narrow Lot with Rear Yard and Detached Garage

FLOOR PLAN

This layout illustrates the intent and feasibility of this unit type. Actual architectural designs will be calibrated to market conditions and desired architectural character. The schematic floor plans shown in the site-wide scenarios adapt these types as necessary to the given context.



SOURCE: Sargent Town Planning – 2025

FIGURE **2-8**

Meridian Consultants

Residential Unit Type A: House

408-001-24

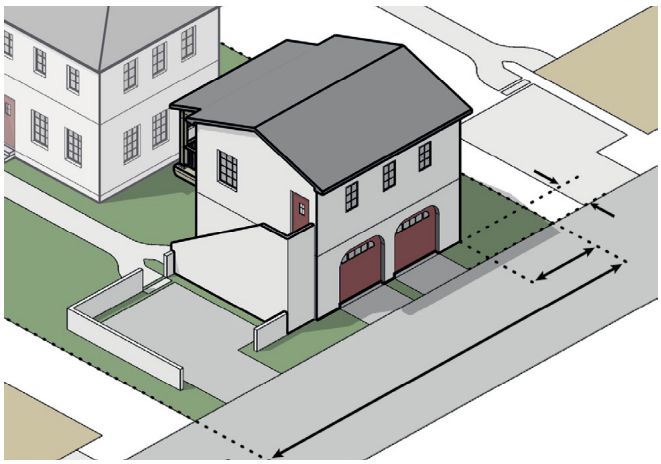
A. Description & Intent

Outbuildings are detached structures in the rear third of House lots. They typically have garages on the ground floor, and above, they may provide workspace, playspace, or living space. When an Outbuilding accommodates an additional household and therefore functions as an Accessory Dwelling Unit (ADU), it is further regulated by Oxnard City Code §16-465.



Table 2.6.10 Outbuilding

Lot Size		
House lots only		
Building Size	Min	Max
A Building width	-	-
B Building depth	-	-
Building Setbacks		
C Side yard	5’	
Street Side Yard	Flush with house	
Rear, with alley	Min. 15’ from centerline	
D Rear to alley	5’	
Building Height	Min	Max
Stories (see Section 2.6.2.K)	2	



Additional surface parking adjacent to outbuildings can supplement the on-site parking supply as desired.

SOURCE: Sargent Town Planning – 2025

FIGURE **2-9**

Meridian Consultants

Outbuildings

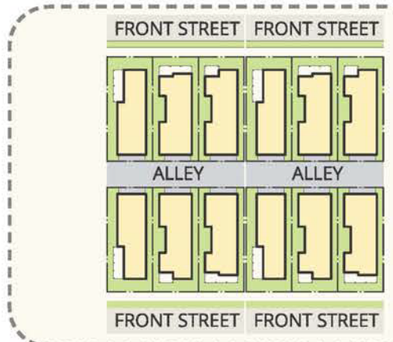
Type B: Side Yard House

Single Family 35'-Wide with Attached Garage and Side Yard

SUMMARY

Lot (minimum)	35' X 90'
Net Density (typ.)	10–13 DU/Acre
Typical Unit Size	2,500 SF
Parking Arrangement	Attached garage on alley

Intent: This house type is very similar to Type A, but can be built on shallower lots because the garage is attached. Each house has an "active side" with windows and doors opening into the side yard, faced by the neighbor's "inactive side," with only high windows for light and air but no view into the yard on that side. The property line is centered in the yard, and the "inactive side" neighbor grants the other an easement for the use of that entire yard area, reserving access for periodic maintenance of the exterior wall, with no fence on the property line.



PRECEDENT IMAGES



Example from Cal State Channel Islands faculty housing



Example from Hercules Waterfront

3D VIEW

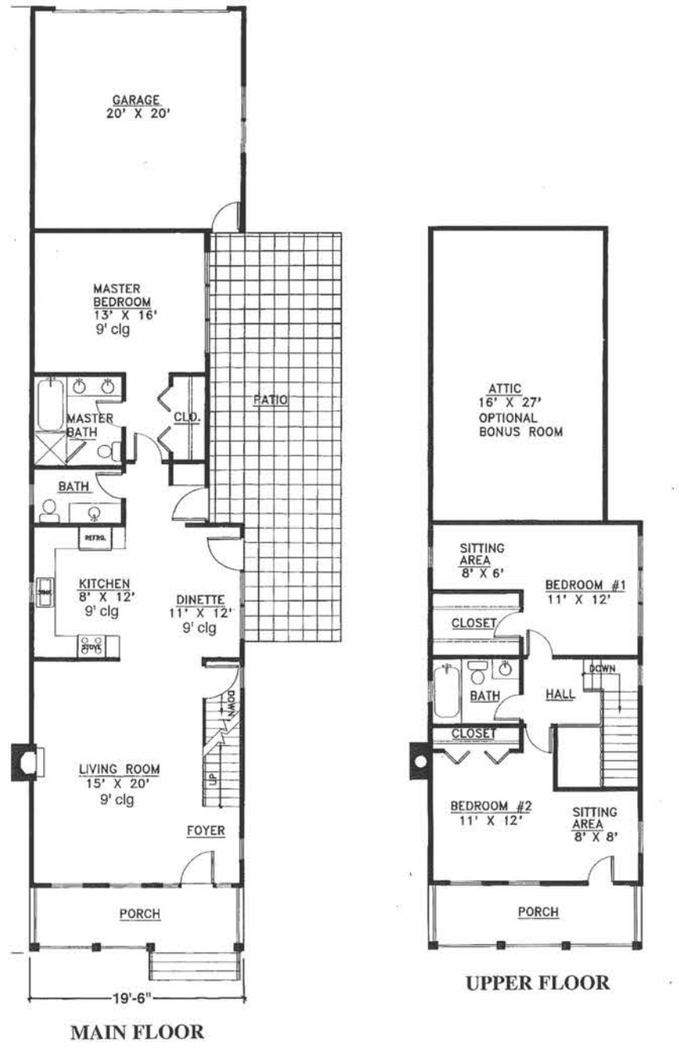


Type B: Side Yard House

Single Family 35'-Wide with Attached Garage and Side Yard

FLOOR PLAN

This layout illustrates the intent and feasibility of this unit type. Actual architectural designs will be calibrated to market conditions and desired architectural character. The schematic floor plans shown in the site-wide scenarios adapt these types as necessary to the given context.



SOURCE: Sargent Town Planning – 2025

FIGURE **2-10**

Residential Unit Type B: Side Yard House

Meridian Consultants

408-001-24

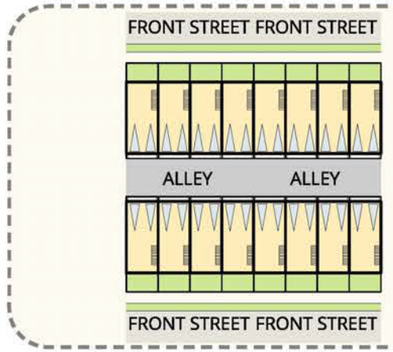
Type C: Rowhouse

V1: "Tuck-Under"

SUMMARY

Lot (minimum)	20' X 60' (assuming each rowhouse is on a fee simple lot))
Net Density (typ.)	16–24 DU/Acre
Typical Unit Size	1,800 SF
Parking Arrangement	Garage occupies rear portion of ground floor (it is "tucked under" the rear of the building)

Intent: These attached townhouses achieve higher densities than V2 rowhouses, but because the garage is attached which offers no private yard space. If this type is provided, it is recommended for locations near to small parks that provide outdoor play areas, as is the case for the Hercules example, below.



PRECEDENT IMAGES



Example from Citrus Place neighborhood in Saticoy



Example from Hercules Waterfront

3D VIEW



Type C: Rowhouse

V1: "Tuck-Under"

FLOOR PLAN

This layout illustrates the intent and feasibility of this unit type. Actual architectural designs will be calibrated to market conditions and desired architectural character. The schematic floor plans shown in the site-wide scenarios adapt these types as necessary to the given context.



SOURCE: Sargent Town Planning – 2025

FIGURE **2-11**

Meridian Consultants

Residential Unit Type C: Rowhouse

408-001-24

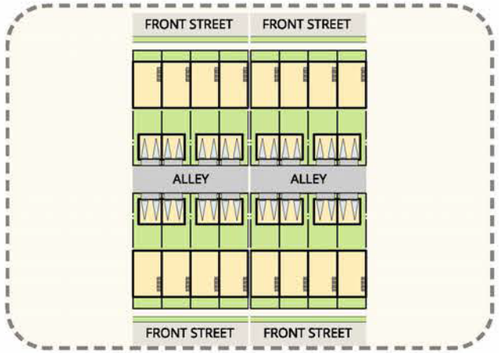
Type C: Rowhouse

V2: Rowhouses with Rear Yard and Detached Garage

SUMMARY

Lot (minimum)	20' X 100' (assuming each rowhouse is on a fee simple lot))
Net Density (typ.)	16–21 DU/Acre
Typical Unit Size	1,800 SF
Parking Arrangement	Detached garage on alley

Intent: These attached rowhouses provide curb appeal and private rear yards comparable to Type A houses, while achieving significantly higher densities than the detached types A and B.



PRECEDENT IMAGES



Example from The Farm in East Ventura



Example from Milpitas

3D VIEW



Type C: Rowhouse

V2: Rowhouses with Rear Yard and Detached Garage

FLOOR PLAN

This layout illustrates the intent and feasibility of this unit type. Actual architectural designs will be calibrated to market conditions and desired architectural character. The schematic floor plans shown in the site-wide scenarios adapt these types as necessary to the given context.



First Floor Second Floor

SOURCE: Sargent Town Planning – 2025

FIGURE **2-12**

Meridian Consultants

Residential Unit Type C: Rowhouse

408-001-24

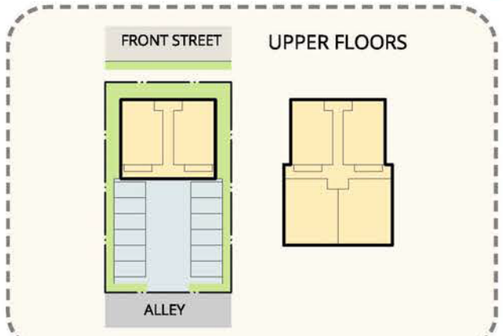
Type D: Multiplex

From Duplexes to 8-plexes

SUMMARY

Lot (minimum)	50' x 60'
Net Density (typ.)	20–35 DU/Acre
Typical Unit Size	850–1,150 SF
Parking Arrangement	Mix of surface and tuck-under parking

Intent: These multiplex apartments typically have 6 to 8 units, achieving higher densities than attached rowhouses, but often offer no private yard space for upper units. If this type is provided, it is recommended for locations near to small parks that provide outdoor play areas.



PRECEDENT IMAGES



Example from Pasadena



Example from Pasadena



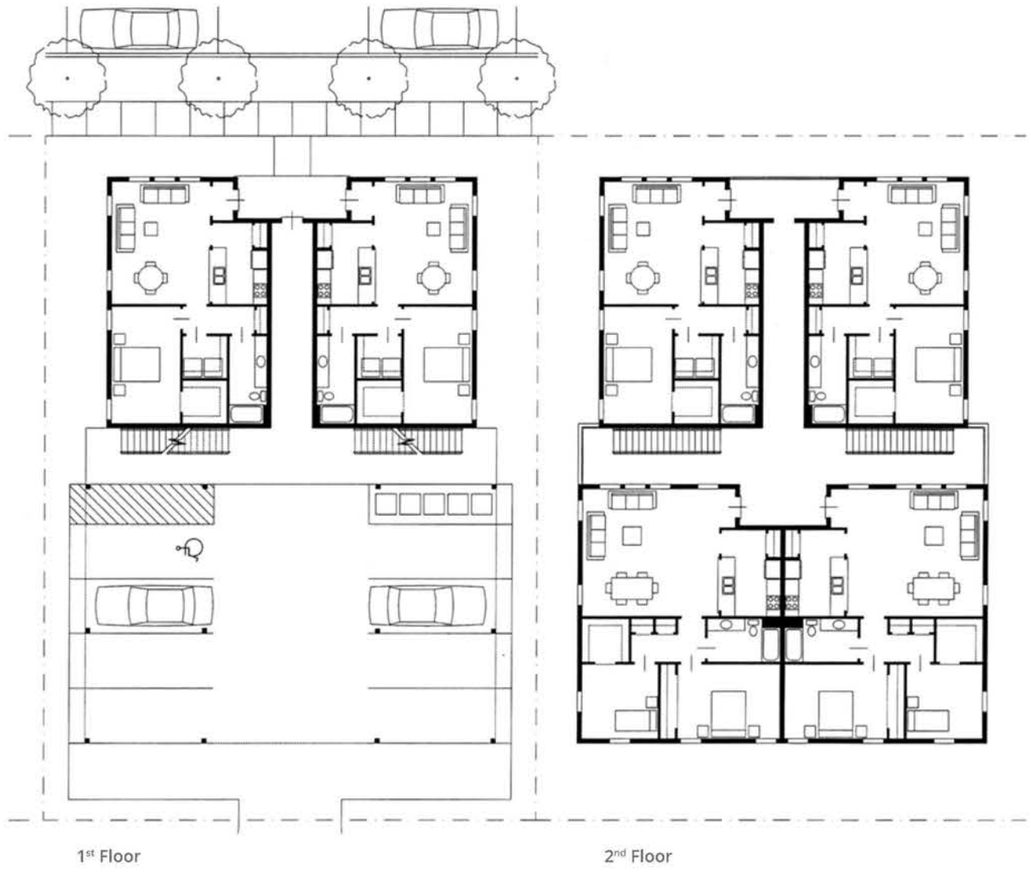
Example from Pasadena

Type D: Multiplex

From Duplexes to 8-plexes

FLOOR PLAN

These layouts illustrates the intent and feasibility of this unit type. Actual architectural designs will be calibrated to market conditions and desired architectural character. The schematic floor plans shown in the site-wide scenarios adapt these types as necessary to the given context.



SOURCE: Sargent Town Planning – 2025

FIGURE **2-13**

Meridian Consultants

Residential Unit Type D: Multiplex

408-001-24

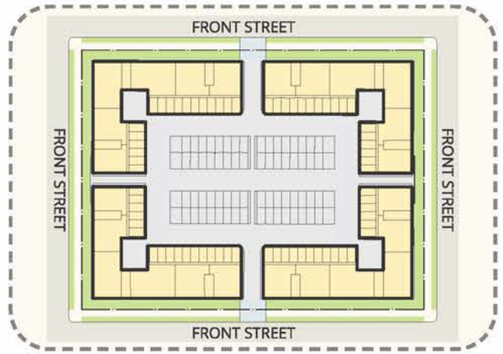
Type E: Walk-Up

Walk-Up Apartments

SUMMARY

Lot (minimum)	50' X 60' (dimensions will be much greater if the lot is an entire block, and the width should vary by increments of 60' to accommodate efficient parking configurations)
Net Density (typ.)	30–40 DU/Acre
Typical Unit Size	1,000 SF
Parking Arrangement	Tuck-under parking and surface parking within the block

Intent: These apartments provide much higher densities and provide parking in tuck-under garages and in surface parking - with or without carports - inside the block. Elevator access is typically not provided, hence the name.



PRECEDENT IMAGES



Parklands Apartments on Wells Road in East Ventura/Saticoy



Example from RiverPark in Oxnard

3D VIEW



Type E: Walk-Up

Walk-Up Apartments

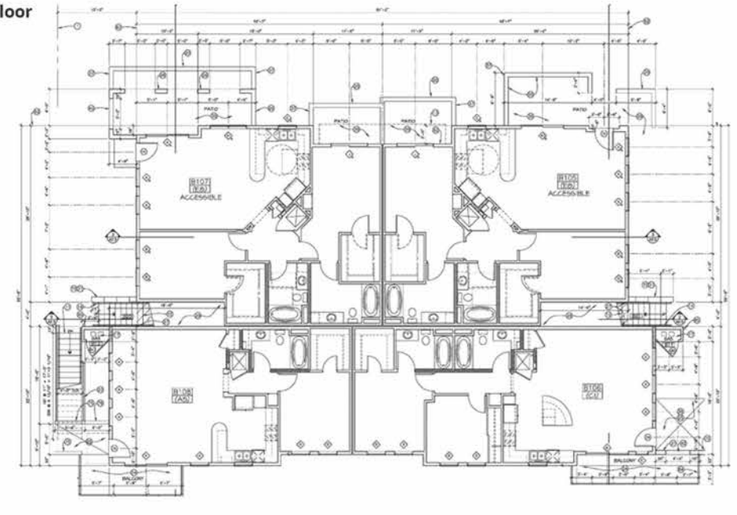
FLOOR PLAN

This layout illustrates the intent and feasibility of this unit type. Actual architectural designs will be calibrated to market conditions and desired architectural character. The schematic floor plans shown in the site-wide scenarios adapt these types as necessary to the given context.

Example Block Site Plan



Building B Second Floor



SOURCE: Sargent Town Planning – 2025

FIGURE **2-14**

Meridian Consultants

Residential Unit Type: Walk-Up

408-001-24

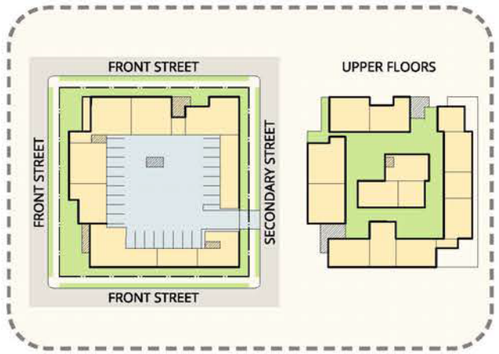
Type F: Podium

Single Podium Apartment Building

SUMMARY

Lot (minimum)	120' X 120' (dimension will typically be much greater; width should vary by increments of 60' to accommodate efficient parking configurations)
Net Density (typ.)	30–45 DU/Acre
Typical Unit Size	1,000 SF
Parking Arrangement	1 level of structured parking at grade, covered by a courtyard/amenity podium

Intent: Parking for these apartments is in a podium, on the lid of which are private internal courtyards for the use of residents.



PRECEDENT IMAGES



Example from Pasadena



Example from Santa Barbara

3D VIEW



Type F: Podium

Single Podium Apartment Building

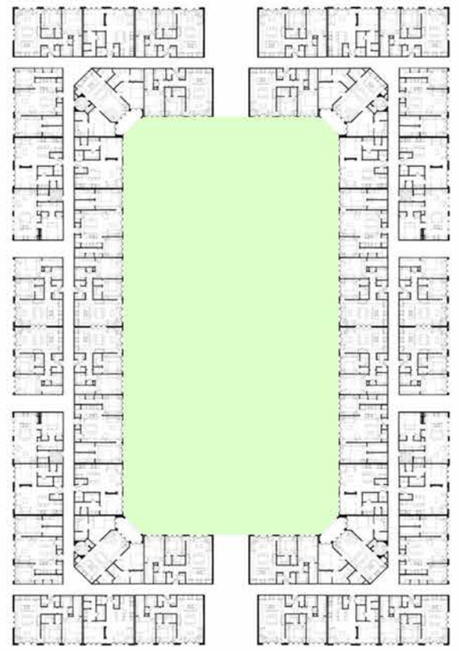
FLOOR PLAN

These layouts illustrates the intent and feasibility of this unit type. Actual architectural designs will be calibrated to market conditions and desired architectural character. The schematic floor plans shown in the site-wide scenarios adapt these types as necessary to the given context.

The precedent plan below is smaller than preferred for efficiency, but it illustrates how units can be flexibly placed over the podium level to create smaller, interesting courtyards.



The precedent plan below illustrates how upper floors can define a larger rectangular amenity courtyard. In this scheme, residential units are accessed by a double-loaded corridor. The ground floor (not shown) is a rectangular parking garage at grade, lined with residential units, entry lobbies, amenities, and/or flexible space.



SOURCE: Sargent Town Planning – 2025

FIGURE **2-15**

Meridian Consultants

Residential Unit Type F: Podium

408-001-24

It faces the street with dooryards and/or porches, providing a welcoming entry, more street parking for visitors since there is no garage curb cut, and high levels of neighborly charm and curb appeal by not devoting over half of the front yard to parking. A private rear yard is provided between the house and detached garage, with access to and from the alley beside the garage.

Outbuildings

Outbuildings are detached structures in the rear third of House lots. They typically have garages on the ground floor, and above, they may provide workspace, playspace, or living space. When an Outbuilding accommodates an additional household and therefore functions as an Accessory Dwelling Unit (ADU), it is further regulated by Oxnard City Code §16-465. Where permitted by City or State law, ADUs in any other arrangements or on other Building Type lots are subject to the Building Type standards of that lot.

2.5.1.2 Type B: Side Yard House

The side yard house residential unit type would have a minimum lot size of 35 ft x 90 ft, allow 10-13 du/ac, have a typical unit size of 2,500 sf and have an attached garage on the alley. It would have an attached garage on an alley. This type is very similar to Type A but can be built on shallower lots because the garage is attached. Each house has an “active side” with windows and doors opening into the side yard, faced by the neighbor’s “inactive side,” with only high windows for light and air but no view into the yard on that side. The property line is centered in the yard, and the “inactive side” neighbor grants the adjacent “active side” neighbor an easement for the use of that entire yard area, reserving access for periodic maintenance of the exterior wall, with no fence on the property line.

2.5.1.3 Type C: Rowhouse

The rowhouse residential unit type has two versions—V1: Tuck Under and V2: Rowhouses with Rear Yard and Detached Garage.

The V1 rowhouse residential type would have a minimum lot size of 20 ft x 60 ft, allow 16-24 du/ac, a typical unit size of 1,800 sf, and a garage that occupies the rear portion of the ground floor, “tucked under” the rear of the building. These attached townhouses achieve higher densities than V2 rowhouses, but because the garage is attached which offers no private yard space. If this type would be provided, it is recommended for locations near to small parks that provide outdoor play areas.

The V2 rowhouse residential type would have a minimum lot size of 20 ft x 100 ft, allow 16-21 du/ac, a typical unit size of 1,800 sf, and a detached garage in an alley. These attached rowhouses provide curb appeal and private rear yards comparable to Type A houses, while achieving significantly higher densities than the detached types A and B.

2.5.1.4 Type D: Multiplex

The multiplex residential type would have a minimum lot size of 50 ft x 60 ft, allow 20-35 du/ac, a typical unit size of 850 to 1,150 sf, and would have a mix of surface parking and tuck-under parking.

These multiplex apartments typically have six to eight units, achieving higher densities than attached rowhouses, but often offer no private yard space for upper units. If this type would be provided, it is recommended for locations near to small parks that provide outdoor play areas.

2.5.1.5 Type E: Walk-Up

The walk-up residential type would have a minimum lot size of 50 ft x 60 ft, allow 30-40 du/ac, a typical unit size of 1,000 sf, and would have tuck-under parking and surface parking within the block. These apartments provide much higher densities and provide parking in tuck-under garages and in surface parking - with or without carports - inside the block. Elevator access is typically not provided, hence the name.

2.5.1.6 Type F: Podium

The podium residential unit type would allow 30-45 du/ac. It would have one level of structured parking at grade, covered by a courtyard/amenity podium. Parking for these apartments is in a podium, on the lid of which are private internal courtyards for the use of residents.

2.5.2 Commercial Buildings

The proposed Sub-Neighborhood Plan would allow the development of 40,000 sf of commercial space within the Project Site. Commercial buildings may be single-story or contain upper floor offices or residential flats.

2.5.3 Parks

The Sub-Neighborhood Plan ensures that open space is within a short walk of every residence and would be developed with the "Power of 10+" concept providing at least 10 types of activities, from active to passive, for children and adults of all ages and abilities. The Project would develop four different types of neighborhood parks detailed below and depicted in **Figure 2-16: Parks**.

West Green. The West Green is envisioned as focal point and gathering space for this new neighborhood. It shall be located along the intersection of Milagro Place and Concha Street, attached to the residential block. The West Green would be a minimum of 1.15 acres in size.

East Village Park Extension. The Project includes a westward expansion of the existing East Village Park into the North Neighborhood, to create a larger, unified community-serving park. Spaces for gathering should engage with the street and transition between the street and any athletic fields which require tall fences. To aid in this spatial transition and to provide an amenity for residents and pedestrians, flexible-use allées[5] can wrap the park.

[5] An allée is a formal walkway or path lined with evenly spaced trees, typically leading to a focal point like a building, plaza, or park feature.



SOURCE: Sargent Town Planning – 2025

FIGURE **2-16**

Meridian Consultants

Parks

408-001-24

These can link into the surrounding pedestrian and biking network, especially on Jacinto Drive, whose bike lanes will connect to a multi-use path on Rose Avenue. This park shall provide for community needs as identified by the City of Oxnard's Parks and Recreation Master Plan. The East Village Park Extension would be a minimum of 5.3 acres.

North Neighborhood Pocket Parks. Smaller parks can be located throughout the North Neighborhood to ensure that all residents are within a short walk to a public open space. These spaces can double as opportunities for water retention and/or detention as needed. The sum of these parks would be a minimum of 3.82 acres.

Neighborhood Green. This one-acre green space will be dedicated as a public park.

2.5.4 Thoroughfares and Pedestrian and Bike Network

The proposed Project would develop throughfares throughout the Project Site that would accommodate various transportation modes such as cars, bicycles, pedestrians and transit. Wide sidewalks, well shaded with trees and lined with street lighting provide a welcoming pedestrian experience. Where possible, parallel street parking shall be provided on both sides of the streets for additional resident and visitor spaces. Lane widths should be narrow to keep traffic speeds low, and therefore compatible with the presence of pedestrians and cyclists. All rights of way within the plan area shall be designed and developed in compliance with the standards provided in the proposed Sub-Neighborhood Plan, as well of those of the City's Bicycle and Pedestrian Facilities Master Plan.

The thoroughfares would consist of sidewalks, Class I and III bike lanes, multi-use paths, paseos, alleys and park edges. The Project thoroughfares and pedestrian and bike network are shown in **Figure 2-17: Thoroughfares** and **Figure 2-18: Pedestrian and Bike Network**. The Project would also have transit services provided by Gold Coast Transit District. The Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations at the following intersections:[6]

- Construct a bus pull-out at the northeast corner of Rose Ave and Camino Del Sol and relocate furniture and signage from the southeast corner.
- Southbound Rose at Camino de la Luna (SW Corner).
- Northbound Rose at Jacinto Drive (formerly Central Street) (NE Corner).
- Northbound Rose at Cesar Chavez Drive (NE Corner).
- Southbound Rose at Cesar Chavez Drive (SW Corner).

[6] Email correspondence between Ava Ediger of Jensen Design & Survey, Inc. and Austin Novstrup of Gold Coast Transit District on February 7, 2024 regarding Agreement No. A-8333.

2.5.5 Parking

On-site parking areas would be located and configured to provide sufficient supply with convenient access to the buildings they serve. The number of parking spaces required is listed in **Table 2-3: Parking Spaces Required.**

TABLE 2-3: PARKING SPACES REQUIRED

Building Type	Number of Spaces Required
House on 55-foot-wide lot	2 per unit
House on lot less 55-foot-wide	2 per unit
Side Yard House	2 per unit
Rowhouse	2 per unit
Multiplex	1 per 1-bedroom unit
Walk-up	1.5 per 2- or 3-bedroom unit
Podium	2 per 4-bedroom unit
Commercial	3 per 1,000 sf of net floor area

Notes

[1] Any use not listed here shall default to the parking minimum contained in the Oxnard Municipal Code Section 16-622.

Source: Sargeant Town Planning, 2024.

2.5.6 Utilities

All existing water, sewer, and storm drain lines in the Project area are owned and operated by the City of Oxnard, with connections available along Rose Avenue and nearby streets, including Cesar Chavez Drive, Jacinto Drive, and Camino Del Sol. New water, sewer, and storm drain systems would be installed within Areas A and C to serve the Project. Water improvements would likely include 8-inch polyvinyl chloride (PVC) distribution mains connecting to the City's system, while new sewer lines would tie into existing City mains. Storm drain facilities are expected to use 18-inch or larger reinforced concrete pipes, with final sizes determined during the final design.

2.6 PROJECT SCHEDULE

Depending on the schedule for review of the Project, construction could begin by 2027 or 2028 and be completed within a 4–5 year timeframe. It is anticipated that development would occur in two (2) phases with the first phase including development of the North Neighborhood in Area A, and the second phase including the Southwest Neighborhood in Area C. For each phase, all public and private infrastructure, including but not necessarily limited to, public/private streets, wet utility mains, and underground dry utilities; would be constructed concurrently. All proposed public and private street improvements in each phase would be constructed and available prior to the occupancy of the first units in each phase. All development and park lots would be mass graded during construction of the infrastructure supporting development.



SOURCE: Sargent Town Planning – 2025

FIGURE **2-17**

Meridian Consultants

Throughfares

408-001-24



SOURCE: Sargent Town Planning – 2025

FIGURE **2-18**

Meridian Consultants

Pedestrian and Bike Network

408-001-24

Fine grading, and the completion of the adjoining sidewalks and parkway landscaping would occur as part of the development of each block.

Phase A is estimated to have a construction workforce that would consist of approximately 20 worker trips per day and 100 hauling trips per day during grading; 484 worker trips per day and 76 vendor trips per day during building construction; 15 worker trips per day during paving; and 97 worker trips per day during architectural coating. Phase C is estimated to have a construction workforce that would consist of approximately 15 worker trips per day and 16 hauling trips per day during demolition; 20 worker trips per day and 75 hauling trips per day during grading; 213 worker trips per day and 32 vendor trips per day during building construction; 15 worker trips during paving; and 43 worker trips per day during architectural coating. The proposed Project's construction schedule is detailed in **Table 2-4: Project Construction Schedule**. Each phase of construction would result in varying levels of intensity and number of construction personnel as shown in **Table 2-5: Project Construction Trips**.

TABLE 2-4: PROJECT CONSTRUCTION SCHEDULE

Construction Activity	Approximate Start Date	Approximate End Date	Duration (Days)	Description
	Phase A: Develop Area A			
Grading	1/1/2027	9/1/2027	174	Grading of Project Site (Export of 212,000 cubic yards of soil)
Building Construction	9/2/2027	12/3/2031	1,110	Construction of proposed Project
Paving	12/4/2031	3/4/2032	65	Paving of asphalt surfaces
Architectural Coating	12/4/2031	9/4/2032	197	Application of architectural coatings to building materials
	Phase C: Develop Area C			
Demolition	1/1/2027	1/29/2027	20	Demolition of existing structures (30,000 sf of structures)
Grading	1/30/2027	3/12/2027	30	Grading of Project Site (Export of 18,000 cubic yards of soil)
Building Construction	3/13/2027	5/6/2028	300	Construction of Proposed Project
Paving	5/7/2028	6/3/2028	20	Paving of asphalt surfaces
Architectural Coating	5/7/2028	9/9/2028	90	Application of architectural coatings to building materials

TABLE 2-5: PROJECT CONSTRUCTION TRIPS

Construction Activity	Worker Trips/Day	Hauling Trips/Day	Vendor Trips/Day
	Phase A: Develop Area A		
Grading	20	100	—
Building Construction	484	—	76
Paving	15	—	—
Architectural Coating	97	—	—

TABLE 2-5: PROJECT CONSTRUCTION TRIPS			
Construction Activity	Worker Trips/Day	Hauling Trips/Day	Vendor Trips/Day
Phase C: Develop Area C			
Demolition	15	16	—
Grading	20	75	—
Building Construction	213	—	32
Paving	15	—	—
Architectural Coating	43	—	

2.7 INTENDED USES OF THIS EIR

Section 15124 (d) of the State CEQA Guidelines requires that an EIR project description include a list of permits and other approvals required to implement a proposed project, the agencies expected to use the EIR in their decision making, and related environmental review and consultation requirements. This Draft EIR assesses the potential environmental effects of the proposed Sub-Neighborhood Plan. This Draft EIR has been prepared to inform the City of Oxnard, any responsible and trustee agencies, and interested parties of the potential for significant environmental impacts and identify measures to mitigate any significant effects if feasible.

The CEQA Guidelines require an EIR to include a statement briefly describing the intended uses of the EIR, including a list of agencies expected to use the EIR in their decision making and the list of the permits and other approvals required to implement the project.

2.7.1 City of Oxnard

The City of Oxnard, acting as Lead Agency for the Project, will consider approval of the following actions:

- Water Supply Assessment
- Sub-Neighborhood Plan as an amendment to the NECSP;
- General Plan Amendment;
- Zone Change;
- Tentative Tract Map; and
- Subsequent Design Review

2.7.2 Other Agencies

Responsible Agencies includes all public agencies other than the Lead Agency which have discretionary approval power over the project. The City has not identified any responsible agencies for the Project at this time. Additionally, no agencies identified themselves as responsible agencies

for the Project in response to the Notice of Preparation (**Appendix B**) distributed by the City to other public agencies.

Trustee Agencies are a state agency having jurisdiction by law over natural resources affected by a project which is held in trust for the people of the State of California. This EIR is intended to provide information requested by state agencies with regard to natural resources that may be affected by the Project.

Other agencies may use this EIR to meet environmental review requirements defined by CEQA for other permits and approvals that may be deemed necessary to carry out the proposed Project and related activities.

3.0 ENVIRONMENTAL SETTING

3.1 EXISTING SITE CONDITIONS

3.1.1 Project Site

The Project Site is located at 1975 Camino Del Sol (Assessor Parcel Numbers [APNs] 214-0-020-615, -625, and -635) in the East Village neighborhood and Northeast Community Specific Plan (NECSP) Area in the City of Oxnard (City). The proposed Sub-Neighborhood Plan identifies the three planning areas shown in **Figure 3-1: Planning Areas Within the Project Site**. **Figure 3-2: Aerial View of the Project Site** provides an aerial photograph showing current conditions within the Project Site. The existing conditions in each of these Planning Areas are described below:

- **Area A (North Neighborhood):** The approximately 44.5-acre Area A in the northern portion of the Project Site consists of undeveloped land previously disturbed by agricultural uses. This Planning Area is bordered by Rose Avenue on the west, Cesar Chavez Drive on the north, Gibraltar Street and the existing East Village Park on the east, and Jacinto Drive on the south.
- **Area B (Del Sol High School):** Approximately 50.7 acres in the central and southeastern portions of the Project Site is developed with Del Sol High School, which opened in July 2023 under the Oxnard Union High School District with an inaugural freshman class and is implementing a phased enrollment plan, adding one grade level each academic year. The school is expected to operate as a fully enrolled high school for grades 9–12 in 2026–2027 academic year. The Del Sol High School site is currently developed with all of the planned classroom buildings, basketball courts, volleyball courts, and the southern surface parking lot. The northern portion of the campus is still under construction with the remaining facilities, including softball and baseball fields, sports fields, football field with bleachers, a pool, locker buildings, tennis courts, and three additional surface parking lots. These improvements are planned to be completed and operational in 2026.
- **Area C (Southwest Neighborhood):** Approximately 11.8 acres in the southwestern portion of the Project Site contains the Maulhardt family residence, barn, cottages, outbuildings, other structures related to the Project Site's agricultural use, and a small lemon orchard that is no longer actively cultivated. There are no current occupants within Area C.

The Project Site has not been actively farmed since 2019. The Project Site includes one parcel owned by Oxnard Union High School District (APN 214-0-020-635) and two parcels (APNs 214-0-020-615 and 214-0-020-625) owned by the Maulhardt/Stiles families.

Figure 3-3: Project Site Photograph Location Map presents a map showing the locations and orientations from which the photos of the Project Site were taken; **Figure 3-4: Project Site Photographs (1 of 2)** shows existing conditions of the northern and eastern portions of the Project Site; and **Figure 3-5: Project Site Photographs (2 of 2)** shows existing conditions of the southern and western portions of the Project Site.

3.1.2 Surrounding Land Uses and Setting

The Project Site is surrounded by two-story single-family residential homes to the north and west. To the east, it is bordered by additional two-story single-family residences and East Village Park, which includes a multi-use path, outdoor exercise equipment, a playground, and lawn areas. To the south, the Project Site is adjacent to a one-story fast-food restaurant, a one-story church, two- to three-story multifamily residential buildings, and two-story single-family homes.

Figure 3-6: Surrounding Area Photograph Location Map presents a map showing the locations and orientations from which the photos of the surrounding area were taken; **Figure 3-7: Surrounding Area Photographs (1 of 2)** shows existing conditions north and east of the Project Site; and **Figure 3-8: Surrounding Area Photographs (2 of 2)** shows the existing conditions south and west of the Project Site.

3.2 GENERAL PLAN LAND USE AND ZONING DESIGNATIONS

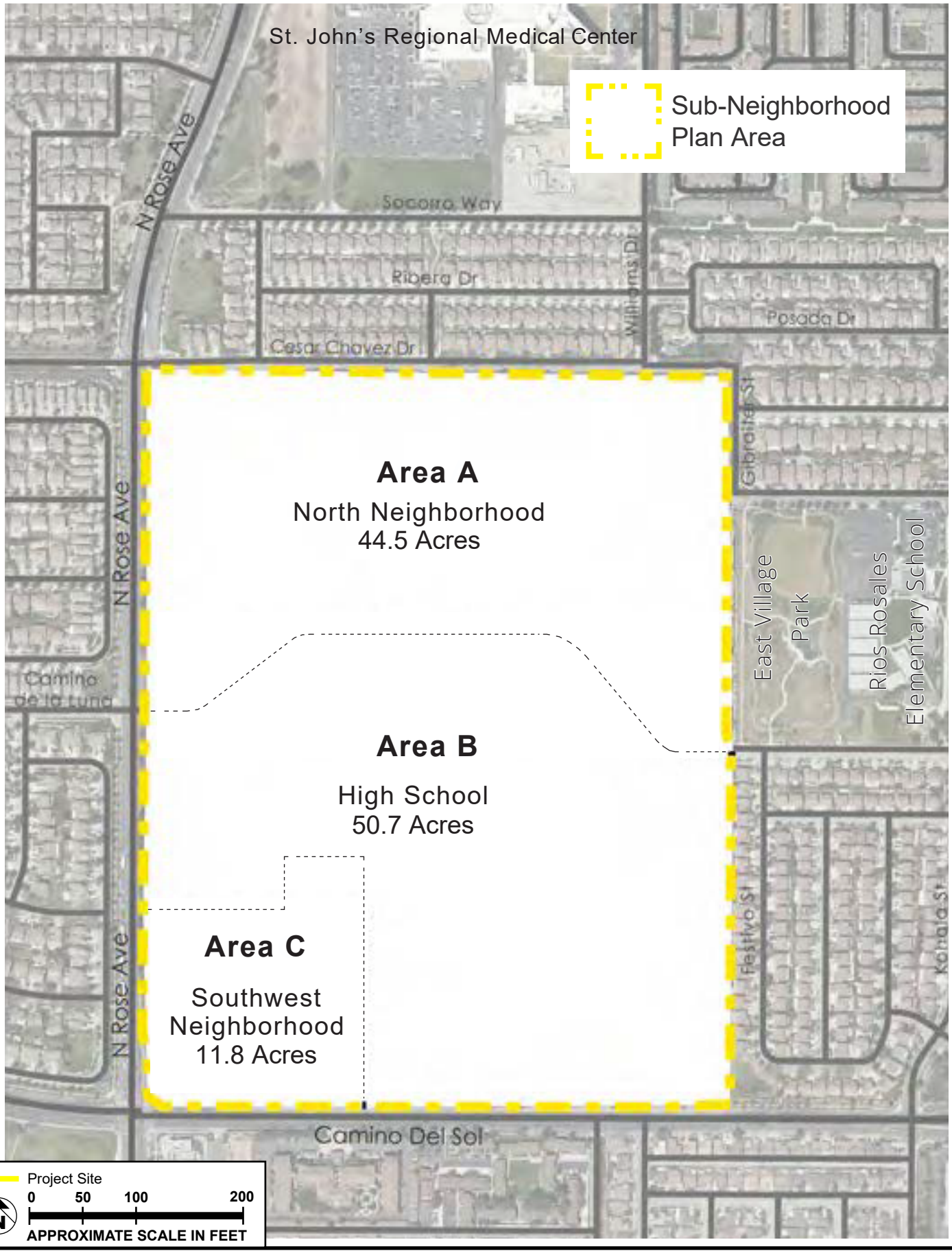
3.2.1 Project Site

As shown in **Figure 3-9: General Plan Land Use**, the Project Site has the General Plan land use designations of Residential Low Medium (RLM), Commercial General (CG) and Park (PRK). As shown in **Figure 3-10: Zoning Map**, the Project Site has zoning designations of Multiple-Family Residential Planned Development (R-2-PD), General Commercial Planned Development (C-2-PD), and Community Reserve (C-R).

3.2.2 Surrounding Area

As shown in **Figure 3-9**, the area surrounding the Project Site has General Plan land use designations of Residential Low Medium (RLM) to the north across Cesar Chavez Drive; Residential Low (RL) and Park (PRK) to the east across Gibraltar Street; RL, Residential Medium High (RMH) and Commercial Neighborhood (CN) to the south across Camino Del Sol; and RL to the west across Rose Avenue.

As shown in **Figure 3-10**, the area surrounding the Project Site has zoning designations of Multi-Family Planned Development (R-2-PD) to the north across Cesar Chavez Drive; Single Family Residential Planned Development (R-1-PD) and Community Reserve (C-R) to the east across Gibraltar Street; R-1-PD, High-Rise Residential Planned Development (R-4PD) and General Commercial Planned Development (C-2-PD) to the south across Camino Del Sol; and R-1-PD to the west across Rose Avenue.



SOURCE: Maulhardt / Stiles – 2024

FIGURE **3-1**

Meridian Consultants

Planning Areas Within the Project Site

408-001-24



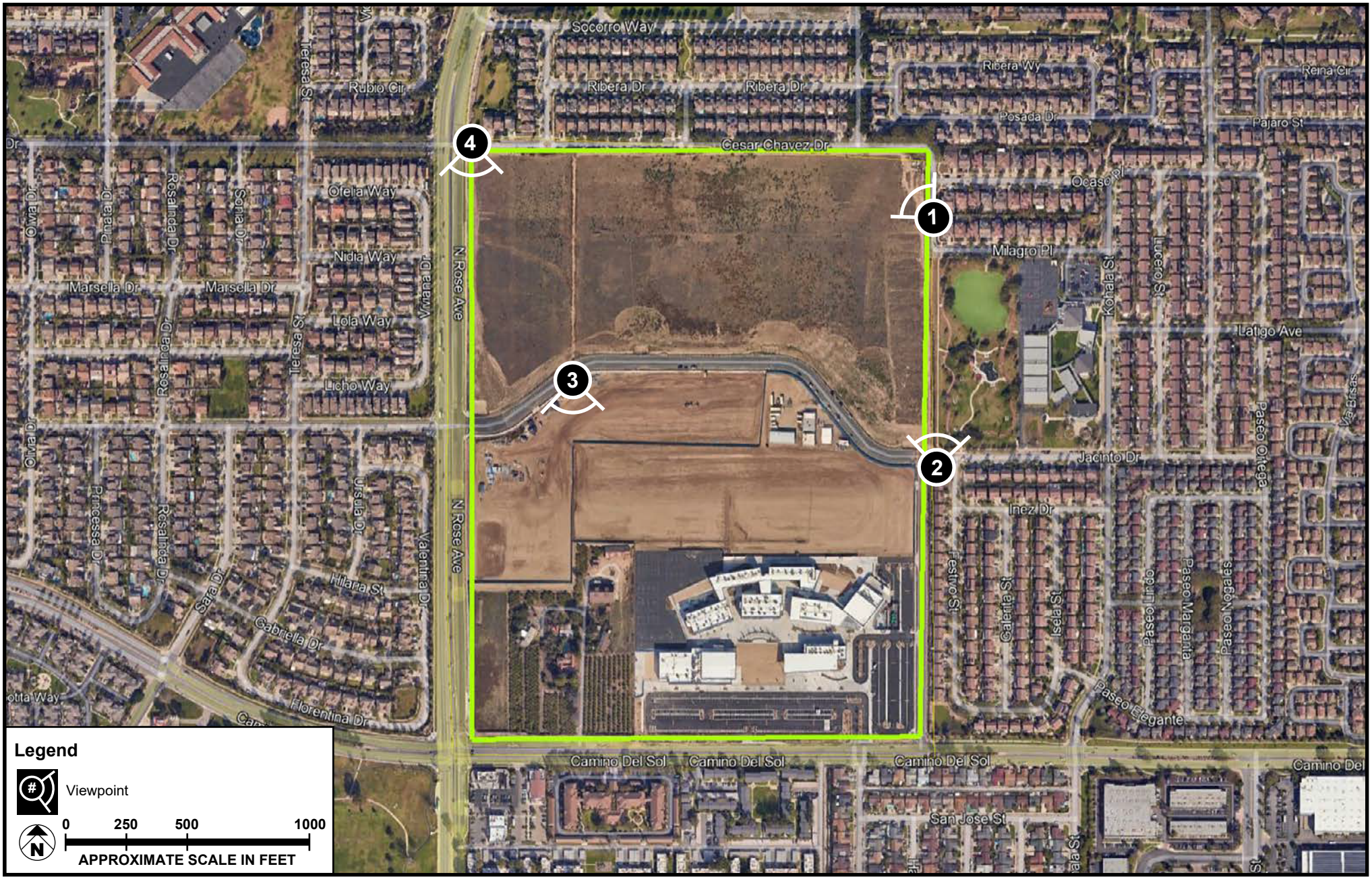
SOURCE: Google Earth - 2025

FIGURE **3-2**

Meridian Consultants

Aerial View of the Project Site

408-002-24



SOURCE: Google Earth - 2025

FIGURE **3-3**

Meridian Consultants

Project Site Photograph Location Map

408-001-24



Photo 1: Looking at the undeveloped northern portion of the Project Site along Gibralter Street



Photo 2: Looking at the undeveloped eastern portion of the Project Site along Jacinto Drive

SOURCE: Meridian – 2025

FIGURE **3-4**

Meridian Consultants

Project Site Photographs (1 of 2)



Photo 3: Looking at southern portion of the Project Site that consists of Del Sol High School, the Maulhardt barn, and disturbed land along Jacinto Drive



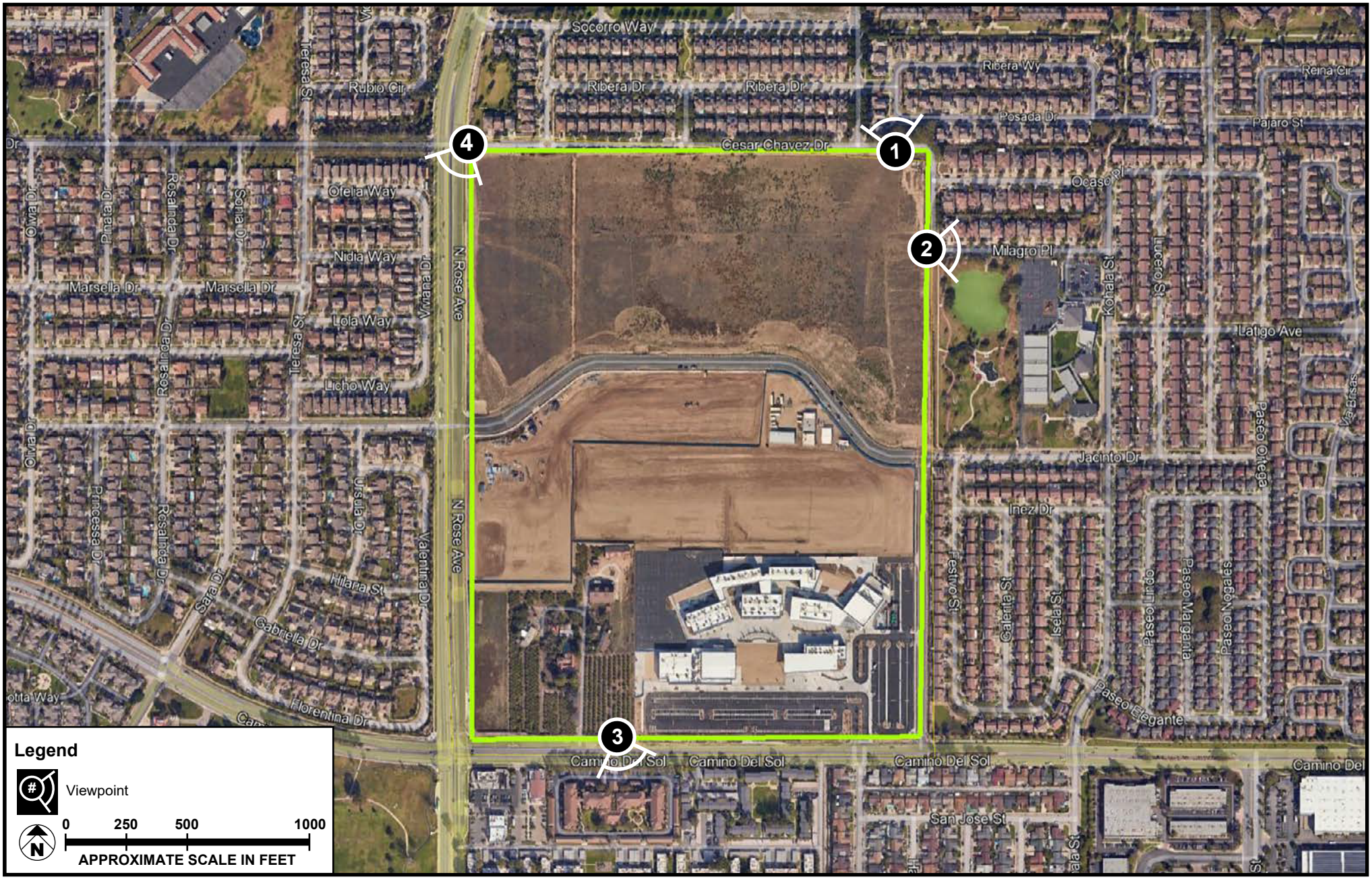
Photo 4: Looking at the western portion of the Project Site that consists of undeveloped land and distant views of the Maulhardt barn and Del Sol High School

SOURCE: Meridian – 2025

FIGURE **3-5**

Meridian Consultants

Project Site Photographs (2 of 2)



SOURCE: Google Earth - 2025

FIGURE **3-6**

Meridian Consultants

Surrounding Area Photograph Location Map

408-001-24



Photo 1: Looking at the two-story single-family homes
located north of the Project Site along Cesar Chavez Drive



Photo 2: Looking at the two-story single-family homes and East Village Park
located east of the Project Site along Milagro Place

SOURCE: Meridian – 2025

FIGURE **3-7**

Meridian Consultants

Surrounding Area Photographs (1 of 2)



Photo 3: Looking at the three-story tall multi-family apartment homes located south of the Project Site along Camino Del Sol



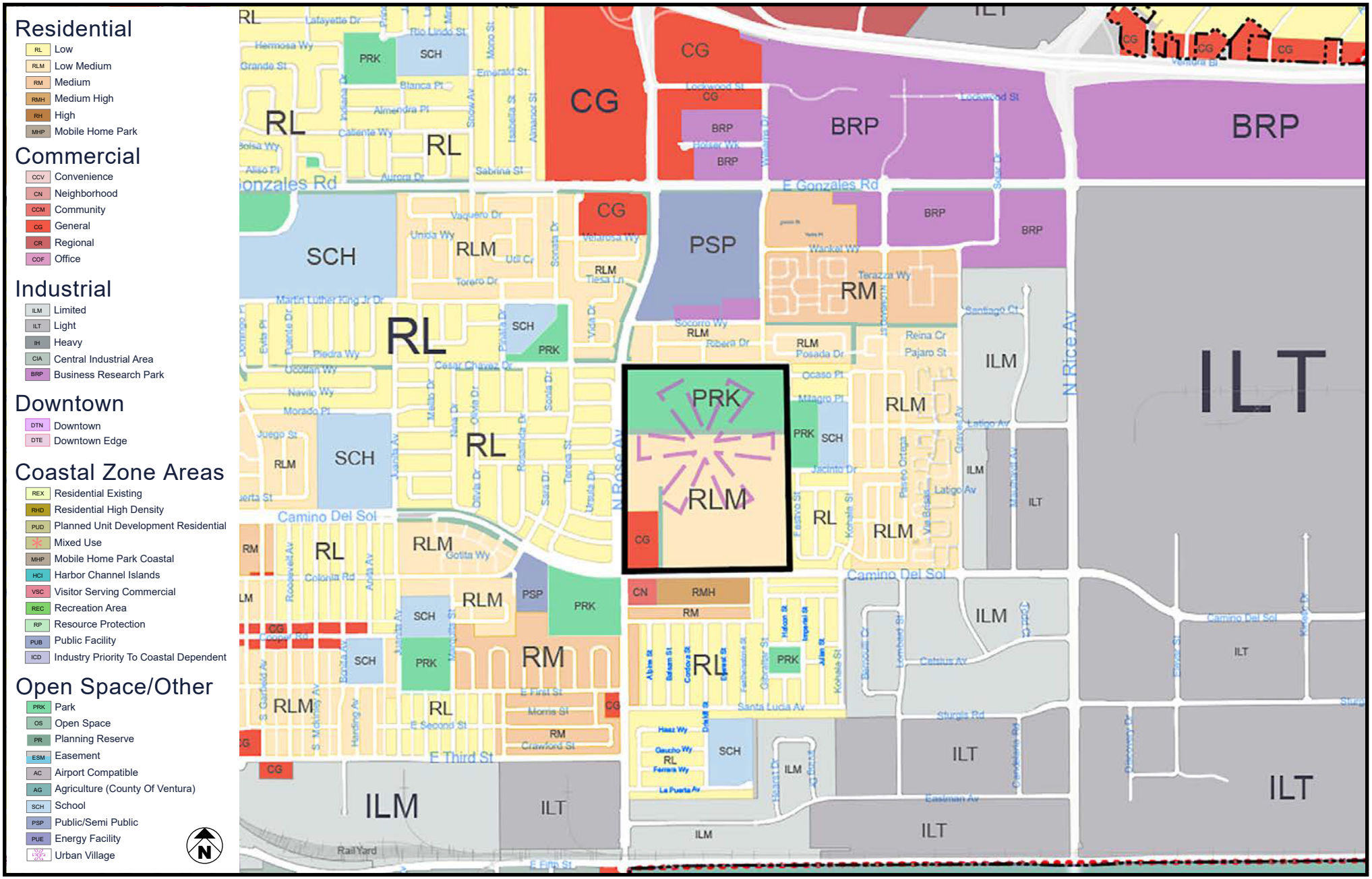
Photo 4: Looking at the two-story single-family homes located west of the Project Site along Rose Avenue

SOURCE: Meridian – 2025

FIGURE **3-8**

Meridian Consultants

Surrounding Area Photographs (2 of 2)



SOURCE: City of Oxnard - 2023

FIGURE **3-9**

Meridian Consultants

General Plan Land Use

408-001-24

Residential

- R-1 Single Family Residential
- R-2 Multiple-Family Residential
- R-3 Garden Apartment
- R-4 High-Rise Residential

Residential Planned Development Zones

- R-1-PD Single Family Residential Planned Development
- R-1-7PD Single Family Residential Planned Development
- R-1-8PD Single Family Residential Planned Development
- R-2-PD Multiple-Family Residential Planned Development
- R-3-PD Garden Apartment Planned Development
- R-4-PD High-Rise Residential Planned Development
- M-H-PD Manufactured Home Planned Development

Downtown

- DT-G Downtown General
- DT-C Downtown Core
- DT-E Downtown Edge

Commercial

- C-1 Neighborhood Shopping Center
- C-2 General Commercial
- CO Commercial Office
- CM Commercial & Light Manufacturing

Commerical Planned Development Zones

- C-1-PD Neighborhood Shopping Center Planned Development
- C-2-PD General Commercial Planned Development
- C-PD Commercial Planned Development
- CO-PD Commercial Office Planned Development
- CM-PD Commercial & Light Manufacturing Planned Development

Industrial

- M-L Limited Manufacturing
- M-1 Light Manufacturing
- M-2 Heavy Manufacturing
- BRP Business & Research Park

Industrial Planned Development Zones

- M-L-PD Limited Manufacturing Planned Development
- M-1-PD Light Manufacturing Planned Development
- M-2-PD Heavy Manufacturing Planned Development

Coastal

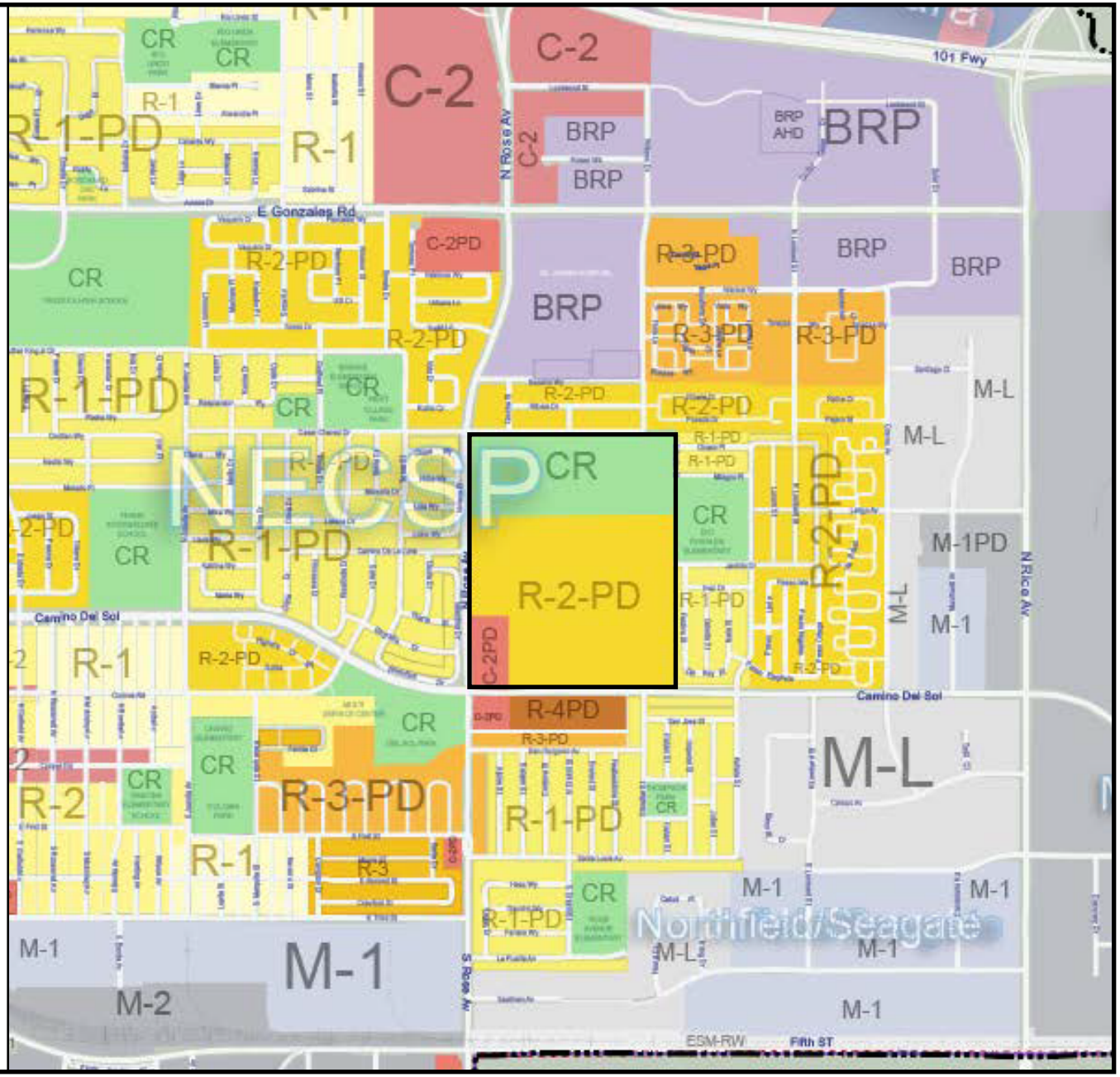
- CNC Coastal Neighborhood Commercial
- CPC Coastal Planned Unit Community
- CVC Coastal Visitor-Serving Commercial
- RP Coastal Resource Protection
- CDI Coastal Dependent Industry
- RC Coastal Recreation
- EC EC Coastal Energy Facility

Beach/Coastal Residential

- R-B-1 Single-Family Beach
- RBF Beachfront Residential
- R-2-C Coastal Low-Density Multiple Family
- R-3-C Garden Apartment Coastal
- R-W-1 Single-Family Water Oriented
- R-W-2 Multiple-Family Water Oriented
- MH-PC Mobile Home Park Coastal

Other

- HCI Harbor-Channel Islands
- CR Community Reserve
- ER



SOURCE: City of Oxnard - 2023

FIGURE **3-10**

Meridian Consultants

Zoning Map

408-001-24

3.3 EXISTING PUBLIC SERVICES AND UTILITIES

3.3.1 Public Transit

The City is served by rail service and fixed route buses including Gold Coast Transit (GCT) and Ventura County Transportation Commission (VCTC) or VISTA, or general public Dial-a-Ride services.[1] The major transit centers include the Oxnard Transit Center (OTC) that provides transfers between GCT, Metrolink, Amtrak, and VISTA along with the C Street Transfer Center at the CenterPoint Mall in Oxnard. GCT Routes 4 and 17 provide service to the project area with stops along Rose Avenue. Route 2 provides local service from the OTC via Colonia Road to Gibraltar Street and return via First Street. Transfers to Routes 15, 19, 20 and 22 are provided at the St. John's Regional Medical Center located at Rose Avenue and Gonzales Road.

3.3.2 Bicycle Routes

The City's Bicycle and Pedestrian Facilities Master Plan identifies existing and proposed bicycle infrastructure within the City. As further described in **Section 4.16**, Class II bicycle lanes are provided along Rose Avenue north of Camino Del Sol, along Camino Del Sol from Garfield Avenue to Del Norte Boulevard, and on Gonzales Road from Victoria Avenue to Rice Avenue.[2] The City's Bicycle and Pedestrian Master Plan proposed new Class II bicycle lanes from south of Camino Del Sol along Rose Avenue, and a bicycle boulevard[3] on Cesar Chavez Drive from Juanita Avenue to Rice Avenue.

3.3.3 Fire Services

The Oxnard Fire Department (OFD) provides fire response, emergency medical services (EMS), Hazardous Materials response, Urban Search & Rescue, and Wildfire response in the City, serving approximately 200,000 residents and approximately 26 square miles.[4] The nearest station to the Project Site is Oxnard Fire Station 5, located at 1450 E Colonia Road, approximately 0.25 miles west of the Project Site.

3.3.4 Police Services

The Oxnard Police Department (OPD) provides law enforcement services to the City, including the Project Site. The OPD has 246 authorized sworn positions and 127 professional staff who provide

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1 City of Oxnard. "Oxnard Transit Center." Accessed June 2025. https://www.oxnard.gov/transit-center.

2 City of Oxnard. *City of Oxnard Bicycle and Pedestrian Facilities Master Plan*. February 2012. Accessed June 2025. https://www.oxnard.gov/wp-content/uploads/Oxnard-BPMP-Final-Plan_ADOPTED-Feb-2012.pdf.

3 Bicycle boulevards are generally installed on minor or local roadways and feature both lane markings and traffic calming measures. The alignment for bicycle boulevards is meant to facilitate bicycling on roads with slower or fewer cars, and on connections through residential areas.

4 City of Oxnard. "Oxnard Fire Department." Accessed June 2025. https://www.oxnard.gov/fire-department.

critical support services.[5] The OPD serves approximately 200,000 residents, which spans approximately 39.2 square miles.

3.3.5 Libraries

The Oxnard Public Library (OPL) department provides the City library services, including the Project Site and offers free access to information, resources, exhibits, programs and more. The OPL department consists of approximately 95,560 square feet of library space, including 72,000 square feet at the Oxnard Main Library, 23,000 square feet at the South Oxnard Library, and 560 square feet at the Colonia Library.[6] The Colonia Library Branch is the closest to the Project Site, approximately 0.25 miles southwest of the Project Site.

3.3.6 Parks

The City's Parks Division provides safe, well-maintained parks and public places. The Parks Division owns and manages 53 parks covering approximately 416 acres.[7] There are six (6) parks within a 0.5-mile radius of the Project Site, including: East Village Park to the east, Thompson Park and Kohala Park to the south, Del Sol Park and Colonia Park to the southwest, West Village Park to the west.

3.3.7 Water

The City obtains water from imported surface water from Calleguas, local groundwater from United, and local groundwater from City wells.[8] The Project Site is within the City's service area. As further discussed in **Section 4.18**, the Project Site has an existing water well, identified as State Well Number (SWN) 02N22W35K03S, CombCode MAUL. In February 2021, the Fox Canyon Groundwater Management Agency (FCGMA) established that SWN 02N22W35K03S had an initial allocation of 196.485 afy of water. FCGMA approved the transfer of 51.300 afy of water from SWN 02N22W35K03S to the City, which included 42.3 afy of water needed for Del Sol High School at APN 214-0-020-635 and an additional 9.0 afy for the remaining southwest farm parcel at APN 214-0-020-635.[9] Thus, a total of 154.185 afy of water allocations are available for the Project, consisting of the 9 afy for the remaining southwest farm parcel and 145.185 afy for the remaining part of the Project Site at APN 214-0-020-615 and APN 214-0-020-625, respectively.

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5 City of Oxnard. "Oxnard Police Headquarters." Accessed June 2025. https://www.oxnard.gov/oxnard-police-hq.

6 City of Oxnard. "Oxnard Local History Collection." Accessed June 2025. https://www.oxnard.gov/cultural-community-services/oxnard-public-library/oxnard-local-history-collection?utm.

7 City of Oxnard. "Find a Park: Public Parks Map." Accessed June 2025. https://www.oxnard.gov/public-works/parks/find-a-park.

8 City of Oxnard. "Chapter 6, Water Supply Characterization." *Urban Water Management Plan*. October 2021. p. 6-1. Accessed June 2025. https://www.oxnard.gov/public-works/water/water-quality-reports.

9 Jensen Design & Survey, Inc. "Water Allocation." *Maulhardt/Stiles NECSP Sub-Neighborhood Plan Water Allocation and Demand Memorandum.* July 15, 2024. p. 2. See **Appendix P**.

3.3.8 Electrical

Southern California Edison (SCE) supplies electrical power within the City, including the Project Site. SCE serves 15 million people in a 50,000-square-mile service area.[10] The SCE service area generated approximately 55,014,996 megawatt-hours (MWh) of electricity in 2022.[11] SCE produces and obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power. As further discussed in **Section 4.18**, the existing development on the Project Site consumes approximately 7,236,308 kilowatt-hours (kWh) per year.

3.3.9 Natural Gas

SoCalGas is the natural gas purveyor within the City, including the Project Site. The SoCalGas service area reaches 21.1 million consumers through 5.9 million meters in more than 500 communities, covering an area of approximately 24,000 square miles throughout Central and Southern California.[12] The SoCalGas planning area had a natural gas throughput of 2,428 Mcf in 2023, with throughput projected to be 2,055 Mcf and capacity projected to be 3,775 Mcf in 2040, the furthest year of currently available projections.[13] As further discussed in **Section 4.18**, the existing high school on the Project Site consumes approximately 5,380,745 kBTU of natural gas per year.[14]

3.3.10 Solid Waste

The City's Public Works Department Environmental Resources Division (ER) provides municipal solid waste (MSW) services to the City, including the Project area. The ER's MSW services include collection, sorting, processing and disposal for 34,154 residential properties and 16,378 commercial users six (6) days a week. The City manages solid waste through the Del Norte Regional Recycling and Transfer Station, where waste is collected, sorted and then transferred to regional landfills for final disposal, including the Simi Valley Landfill and Toland Road Landfill.[15]

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10 Southern California Edison (SCE). "Our Service Territory." Accessed June 2025. https://www.sce.com/about-us/who-we-are/leadership/our-service-territory#:~:text=Our%20Service%20Territory&text=As%20one%20of%20the%20nation's,central%2C%20coastal%20and%20Southern%20California.

11 SCE. *Electric Company ESG/Sustainability Quantitative Information*. October 23, 2023. Accessed June 2025. https://download.edison.com/406/files/20239/EIX%20ESG_Template_Version_1_Quantitative_vF%202023%2010%2023.pdf?Signature=D%2BMaWBcyodbYSMQGTjWRYFaiOOo%3D&Expires=1725042673&AWSAccessKeyId=AKIAJX7XEOOELCYGIVDQ&versionId=VTDYff0IP5KsaSzISo0EOUroQydqppQo&response-content-disposition=attachment.

12 Southern California Gas (SoCalGas). "Company Profile." Accessed June 2025. https://www.socalgas.com/about-us.

13 SoCalGas. *2024 California Gas Report*. Accessed June 2025. https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf.

14 Natural gas is primarily measured in terms of cubic feet (cf), or millions of cubic feet (MMcf), as well as in terms of British thermal units (Btu), and Therms.

15 City of Oxnard. "Environmental Resources." Accessed June 2025. https://www.oxnard.gov/public-works/environmental-resources.

3.3.11 Cable/Telecommunications

The City has approximately 10 internet service providers (ISP) for commercial and residential use. The ISPs include Spectrum, AT&T, EarthLink, Frontier, Viasat, T-Mobile, Hughesnet, XNet WiFi, Starlink and Verizon.[16]

3.4 RELATED GROWTH

Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts when the incremental effect of a project is cumulatively considerable as defined in Section 15065 of the CEQA Guidelines. Cumulative impacts are defined in Section 15355 as "...two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts."

Section 15130(b)(1) of the CEQA Guidelines states adequate discussion of cumulative impacts should consider:

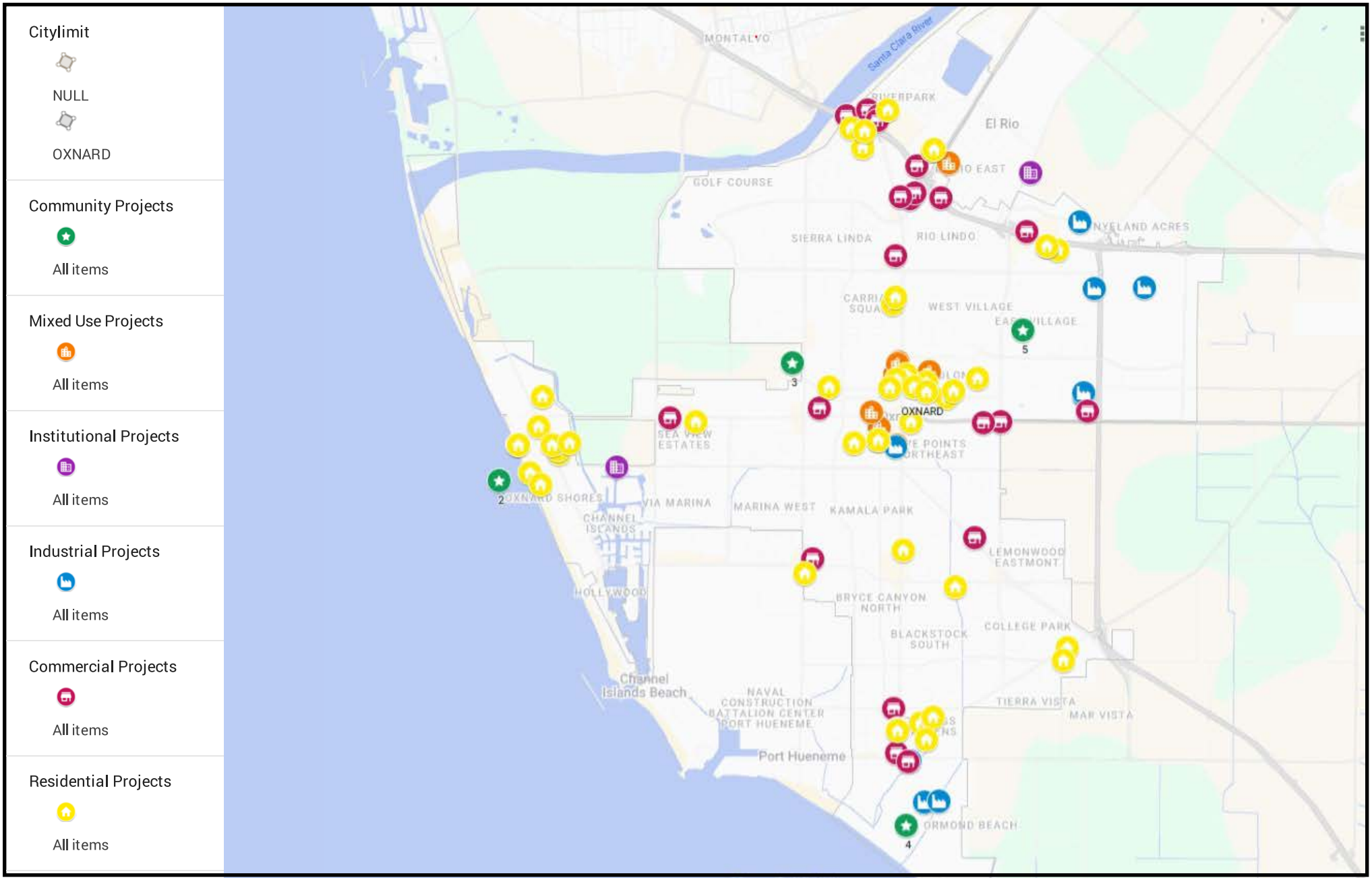
1. Either:
    a. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or
    b. A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions;
2. When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.
3. Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.
4. A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
5. A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

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16 BroadBandNow. "Internet Providers in Oxnard, California." Accessed June 2025. https://broadbandnow.com/California/Oxnard.

The cumulative impact analyses contained in the topical sections in **Section 4.0: Environmental Impact Analysis** consider related projects in the City of Oxnard.[17] The City serving as the Lead Agency defines the geographic scope for each environmental topic. A list of related projects is provided below in **Table 3-1: Related Projects** and shown in **Figure 3-11: Related Projects**. In addition, projections in the Oxnard 2030 General Plan and other planning documents are also considered and used in the assessment of potential cumulative impacts, where appropriate, as well as related projects in proximate jurisdictions. The cumulative analysis approach for each environmental topic is discussed in **Section 4.0, Environmental Impact Analysis**.

17 City of Oxnard. "Development Projects." Accessed May 2025. https://www.oxnard.gov/community-development/building-engineering/development-projects.



SOURCE: City of Oxnard - 2025

FIGURE **3-11**

Meridian Consultants

Related Projects

408-001-24

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
1	Residential[1]	Harrison Ave Apartments	145 N Harrison Ave Oxnard, CA	96-unit, four-story apartment complex on a 67,953-square-foot vacant site (1.56 acres). The project includes a Density Bonus (requesting 3 concessions), Lot merger (five lots merged into one lot), Zone Change, and General Plan Amendment.
2	Residential	C Street Apartments	1227 and 1239 S C St Oxnard, CA	18-unit apartment complex on 0.85-acre site.
3	Residential	Duplex with Accessory Dwelling Unit (ADU)	5305 Saviers Rd Oxnard, CA	2,943-square-foot duplex with a 984-square-foot detached garage attached to a 2nd floor, 984-square-foot ADU.
4	Residential	Duplex with ADU	5309, 5905, 5909, and 5913 Saviers Rd Oxnard, CA	2,943-square-foot duplex with a 984-square-foot detached garage that has an attached 2nd floor, 984-square-foot ADU.
5	Residential	Duplex with ADU	5309, 5905, 5909, 5913 Saviers Rd Oxnard, CA	2,943-square-foot duplex with a 984-square-foot detached garage that has an attached 2nd floor, 984-square-foot ADU.
6	Residential	Single Family Home with an ADU	412 Howell Rd Oxnard, CA	Conversion of an existing 1,840-square-foot church into a 1,296-square-foot single-family dwelling (SFD), with an attached 408-square-foot garage, and an attached 586-square-foot ADU.
7	Residential	The Pointe Apartments	2800 N. Oxnard Blvd Oxnard, CA	Multifamily residential development of 280 apartment units consisting of a mix of studios, 1 bedroom, 2 bedrooms, and 3 bedrooms on a 4.85-acre site. The project will be 4 stories with 5.5-story above-grade parking structure accommodating 490 spaces.
8	Residential	Albany Apartments	2929 and 2931 Albany Dr Oxnard, CA	19 residential apartment units on three combined lots of approximately 53,975 square feet.
9	Residential	Lockwood III Apartments	2151 Lockwood St Oxnard, CA	234 apartments on a 5.17-acre site.
10	Residential	First & A Street Apartments	137 First St Oxnard, CA	34,452-square-foot 5-story mixed use apartment building with 53 residential units (6 affordable), 27 parking spaces, and 6,970.9 square feet of open space on a 0.48-acre project site.
11	Residential	940 Dunes Duplex	940 Dunes Oxnard, CA	Construction of a duplex residential structure located at 940 Dunes St.

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
12	Residential	Lockwood II Senior Apartments	2001 Lockwood Oxnard, CA	168 all-affordable senior living apartments.
13	Residential	Casa Aliento	1245 N Oxnard Blvd Oxnard, CA	Convert the former Vagabond Inn to a 70-unit permanent supportive housing complex.
14	Residential	1345 N Oxnard Boulevard Apartments	1345 N Oxnard Blvd Oxnard, CA	Construct a four-story, 142-unit apartment complex on a 3.07-acre site located north of an existing new/used automotive & recreational vehicle dealership. The apartment complex includes 82 one-bedroom units, 60 two-bedroom units, indoor and outdoor amenities, and 180 parking spaces on ground floor. Two ADUs are also proposed.
15	Residential	The Village Wagon Wheel Development Projects (Planning Area 6/Lot 1) Park Place II	6RR7+2C Oxnard, CA	33 attached condominiums (22 three-bedroom & 11 four-bedroom) in 11 townhouse-style three-story buildings on a 2.0-acre site. Private two-car garage for each unit, and 25 on-street guest parking spaces. (Affordable units for Village Specific Plan provided in Village Family Apartments).
16	Residential	Cypress Court Tiny Home Duplex	5208-5230 Cypress Road Oxnard, CA	30 dwelling units consisting of 15 one-bedroom units, three studio units, and 12 loft units ranging from 383 to 511 square feet (sf) in size.
17	Residential	Lockwood I Senior Apartments	2001 Lockwood Oxnard, CA	173 all-affordable senior living apartments.
18	Residential	Aspire Apartments	536 Meta St Oxnard, CA	Construction of a five-story building, 88-unit podium style apartment building.
19	Residential	Encanto	1101 W Second St Oxnard, CA	27 single family homes on a 4.1-acre site. The three-bedroom single-story homes will be 1,149 to 1,201 sf in size on lots ranging between 3,838 and 9,752 sf.
20	Residential	Dansk Phase 2	2300 Pleasant Valley Rd Oxnard CA	46-unit, two-story apartment building on 1.05 acres. Requested zone change, general plan amendment and PD overlay.
21	Residential	Cypress Place at Garden City	5536 -5582 Cypress Rd Oxnard, CA	All-affordable 150 dwelling unit apartment complex on 5.22-acre site. Three-story buildings with units ranging between 572 and 1,012 sf in size. Includes learning center & maintenance buildings.

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
22	Residential	Navigation Center	241 W 2nd St Oxnard, CA	Active homeless shelter and 56-unit supportive housing project.
23	Residential	105 S Roosevelt Multi-Family	105 South Roosevelt Ave Oxnard, CA	Construction of a two-story, 1,760-square-foot residential building on an existing 8,400-square-foot R-2 lot.
24	Residential	C Street Apartments	761 S C St Oxnard, CA	Construction of a five-story, 175-unit apartment building. Structure will be podium structure with parking and retail space on ground floor with four levels of studio, one-, and two-bedroom units.
25	Residential	Las Cortes Phase 3	6R3P+8F Oxnard, CA	129 affordable units on 8.2 acres, within the Las Cortes Planned Residential Group.
26	Residential	Portofino Place	5QWP+Q9 Oxnard, CA	New 90 unit, planned development, duplex-townhome development on 7.6 acres. The project includes a subdivision map, General Plan amendment, Zone Change, & Special Use Permit.
27	Residential	Fore RiverPark	2700 and 2750 N. Ventura Rd Oxnard, CA	333 unit, five-story apartment complex on 4.2-acre site within the RiverPark Specific Plan Community.
28	Residential	19 Unit Apartment Complex	780 S G St Oxnard, CA	19-unit, four-story apartment complex on a 21,000-square-foot vacant site (0.48-acre). One- to three-bedroom units on upper floors with parking on ground level. (Across Oxnard Community Park East.)
29	Residential	Silva Residence	2711 Colonia Ave Oxnard, CA	New home w/ADU—Development Design Review. 1,667-square-foot single-family residence and 625-square-foot ADU.
30	Residential	Vazquez Residence	2721 Colonia Ave Oxnard, CA	New home w/ ADU—Development Design Review. 1,667-square-foot single-family residence and 625 square-foot ADU.
31	Residential	Castro Residence	148 S Hayes Ave Oxnard, CA	Construction of a 1,768-square-foot single-family residence with a two-car garage.
32	Residential	Roosevelt Duplex	213 S Roosevelt Ave Oxnard, CA	New 4,000 sf attached duplex.
33	Residential	Detached Dwelling	2310 Saviers Rd Oxnard, CA	Construct a detached two-story, 1,500-square-foot single-family residence with five total garage spaces on a 16,700-square-foot developed lot with two existing homes.

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
34	Residential	Residential Beachfront Home	1121 Capri Wy Oxnard, CA	Construct a new 6,921-square-foot, beachfront single-family home with an attached 725-square-foot garage on a vacant lot.
35	Residential	Residential Beachfront Home	847 Mandalay Beach Rd Oxnard, CA	Construct a new 6,920-square-foot, beachfront single-family home with an attached 656-square-foot garage on a vacant lot.
36	Residential	Triplex	5201 Driftwood St Oxnard CA	A condominium triplex on an undeveloped lot in the coastal zone. waived parcel map.
37	Residential	Triplex	5231 Neptune Square Oxnard, CA	A triplex on an undeveloped lot in the coastal zone.
38	Residential	Residential Duplex	4981 Dunes Circle Oxnard, CA	Construct a two-story, residential duplex on a 6,600 square-foot vacant lot.
39	Residential	Single-Family Residence	204 S. Juanita Ave Oxnard, CA	Construct a 2,115 square-foot single-family residence with an attached two-car garage on a 6,925 square-foot lot located within the La Colonia Neighborhood.
40	Residential	Duplex Condominium Subdivision	861 Dunes St Oxnard, CA	Create 2 condominiums on a single parcel.
41	Residential	The Village Wagon Wheel Development Project PA 14 (Lots 4 & 10) Mayfair	6RP8+V7 Oxnard, CA	Approved construction of 88 condominium dwelling units (57 two-bdrm., 29 three-bdrm., and 2 four-bdrm. units) in 6 three-story residential buildings on 4.03 acres within the Village Specific Plan area. (Lower-income affordable units for Village Specific Plan provided in Village Family Apartments.)
42	Residential	Single-Family Beachfront House	855 Mandalay Beach Rd Oxnard, CA	A 6,997-square-foot, single-family house and garage on a 3,744-square-foot lot.
43	Residential	The Village Wagon Wheel Development Projects (PA 7, 9, 10 & a portion of 8) Oxford Flats	6RQ8+R9 Oxnard, CA	Approved construction of 144 condominium dwelling units (36 two-bdrm., and 108 three-bdrm. units) in 12 four-story residential buildings on 6.51 acres within the Village Specific Plan area. (Lower-income affordable units for Village Specific Plan provided in Village Family Apartments.) Lot 8 BP# 16-4174
44	Residential	Etting Road Affordable Apartments	2161 Etting Rd Oxnard, CA	Construction of 58 affordable apartment units for farm workers and veterans.

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
45	Residential	Avalon Homes Subdivision	5QV7+GC Dunes St Canal St. Oxnard, CA	56 single-family homes and a tentative tract map for two lots on an 8.1-acre property.
46	Residential	North Shore Subdivision	6Q25+6F W Fifth Street and Harbor Blvd. Oxnard, CA	183 single-family homes and 109 detached condominiums.
47	Commercial [2]	Mister Carwash	2441 Vineyard Ave Oxnard CA	A request to build a new 5,400-square-foot automated car wash with 16 vacuum stalls and three standard parking spaces on a 1.4-acre parcel of land with a maximum height of 35 feet.
48	Commercial	Dish Wireless	1341 W Channel Island Blvd Oxnard CA	Active 70-foot-high mono-eucalyptus wireless telecommunication facility
49	Commercial	Starbucks Drive-Thru	2011 N Oxnard Bl	Construction of a 2,560-square-foot drive-thru coffee shop on an 8.72-acre site developed with an existing shopping center.
50	Commercial	Fast Food - Ives Avenue	1600 Ives Ave Oxnard CA	Demolition of existing events center (existing monument sign and public art will remain on site). Development of a 2,533-square-foot fast food restaurant with drive- thru related improvements (parking, trash enclosure, sidewalks, patios, landscaping).
51	Commercial	Oxnard Express Car Wash	481 Ventura Blvd Oxnard CA	Proposal to construct an automated 3,950-square-foot drive through car wash facility with 19 vacuum station canopy on a 38,807-square-foot undeveloped site.
52	Commercial	Starbucks Drive Thru	1720 Ventura Blvd Oxnard, CA	Demolition of existing 7,080-square-foot commercial structure and construct a new 1,800-square-foot Starbucks Coffee with drive-thru and 15 car stacking lane and 27 parking spaces on an 0.85-acre lot in the Rose-Santa Clara Specific Plan area.
53	Commercial	Wireless Facility	2400 Eastman Ave Oxnard CA	Mono-pine tree and associated equipment in a ground enclosure.
54	Commercial	Ventura Road Electronic Billboard	6RR7+Q4 Oxnard, CA	Proposal for an 80-foot tall Freeway Adjacent Digital Display Billboard with a sign face of 14.5 feet in height and 48.5 feet in length (approximately 700 sf per side).

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
55	Commercial	Riverpark Boulevard Electronic Billboard	6RMG+R4 Oxnard, CA	Proposal for an 60-foot tall Freeway Adjacent Digital Display Billboard with a sign face of 14.5 feet in height and 48.5 feet in length (approximately 700 sf per side).
56	Commercial	Lot 1 of The Landing at Riverpark	6RV8+3J Oxnard, CA	Construction of a 3,442-square-foot gas station and convenience store building with a 1,160-square-foot car wash building, and an 875-square-foot car wash equipment storage building on Town Center Drive.
57	Commercial	Daya Enterprises Gas Station	5587 Saviers Rd Oxnard, CA	Construction of a 3,000-square-foot convenience store and fueling station.
58	Commercial	Lot 4 of The Landing at Riverpark	6RR9+Q9 Oxnard, CA	Construction of a 7,236-square-foot multi-tenant commercial building with a drive-through. Lot 5 of The Landing at Town Center Dr, RiverPark.
59	Commercial	Wireless Facility	375 S. K St Oxnard, CA	New 52-foot-tall mono-eucalyptus and associated equipment ground enclosure in a landscape area of a parking lot.
60	Commercial	Wireless facility	490 S. Rose Ave Oxnard, CA	New 70-foot-tall mono-eucalyptus tree and associated equipment ground enclosure in the railroad right-of-way near the northeast corner of the intersection of 5th Street and Rose Ave.
61	Commercial	Wireless facility	1341 Channel Islands Blvd Oxnard, CA	New 70-foot-tall mono-eucalyptus tree and associated equipment ground enclosure in the parking lot of a regional commercial shopping center (Port Place Shoppes).
62	Commercial	TRU Hotel by Hilton	180 W. Esplanade Oxnard, CA	A 44,370-square-foot five-story building, infill project with 88 rooms.
63	Commercial	Pantoja Trucking	4RWF+QF 310 Hueneme Rd Oxnard, CA	Warehouse/shipping facility with outdoor vehicle storage and offices.
64	Commercial	U-Haul of North Oxnard	2420 N Oxnard Blvd Oxnard, CA	Reuse of existing structure for U-Haul, Truck Rentals, indoor mini-storage use, and general warehouse.
65	Commercial	RiverPark Hotels	6RR9+F8 Oxnard, CA	Active development of two, four-story hotels (TownePlace Suites and SpringHill Suites), each featuring 120 rooms.
66	Commercial	Pleasant Valley Plaza	105 W. Pleasant Valley Rd. Oxnard, CA	Remodel existing shopping center, construct new 11,392 sf commercial/retail building with related

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
				site improvements to parking, landscaping, lighting, signage, etc.
67	Commercial	Rancho Victoria Plaza Shopping Center	3600-3700 W Fifth St Oxnard, CA	Proposal to construct eight retail/commercial buildings that will range between 3,388 and 6,472 sf in size. Buildings will be constructed on separate lots.
68	Commercial	Faux Eucalyptus Wireless Tower	511 Buena Vista Avenue Oxnard, CA	New 100-foot-tall mono-eucalyptus tree and associated equipment ground enclosure located at 511 Buena Vista Avenue.
69	Industrial[3]	Tentative Parcel Map for Industrial Condominium Purposes	2360-2364 Sturgis Rd Oxnard, CA	One lot subdivision with 22 industrial condominium units of an existing 3.329-acre parcel that contains three buildings totaling 47,674 sf.
70	Industrial	Tentative Parcel Map	2360, 2362, and 2364 Sturgis Rd Oxnard, CA	Subdivision of an existing 3.329-acre parcel that contains three existing industrial buildings for industrial condominium purposes. The proposed subdivision will provide shared access, parking, and landscaping.
71	Industrial	Trojan Storage of Oxnard	2111 Auto Center Dr Oxnard CA	The construction of a new self-storage facility within an existing 2.34-acre site consisting of a single-story building and three-story building with an office/retail area and manager's residential unit. The proposed self-storage facility includes 20 parking spaces, three loading spaces, landscaping, and a perimeter wrought iron fence along the westerly and easterly sides, and adjacent with the front of the building.
72	Industrial	6001 Arcturus Avenue Outdoor Storage Yard Project	6001 Arcturus Ave Oxnard, CA	Proposal to operate a surface storage and parking facility to store shipping containers, tractors, trailers, trucks, automobiles, and other port-related storage material on a 9-acre site.
73	Industrial	Mister Softee Mobile Food Commissary	811 Mercantile St Oxnard, CA	To allow for the renovation and tenant improvement of an existing 8,400 sf warehouse building on a 23,286 sf parcel. The project proposes the conversion of 4,290 sf of existing tenant space into a new mobile food commissary and will also include a 530-square-foot truck wash area and 222-square-foot trash

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
				enclosure within 9,458 sf of existing yard space.
74	Industrial	Solar Pacific Professional Development	1750 Solar Dr Oxnard, CA	Eight building development with building areas ranging between 3,008 and 8,519 sf. The tentative subdivision map proposes to subdivide the 3.69-acre site into nine parcels.
75	Industrial	Arcturus Cold Storage	5980-5990 Arcturus Ave Oxnard, CA	Construction of a 103,705-square-foot, steel-framed cold storage building with 36 truck loading docks and 270 truck/container storage spaces, container storage area with 90 containers stacked three levels high, and a 48-space vehicle parking lot.
76	Industrial	101 Logistics Center	6V88+J8 Oxnard, CA	Construction of four industrial buildings totaling 778,720 sf and related site improvements on four separate lots. Project site is 40.87 acres within the Sakioka Farms Business Park, located north of Sakioka Drive, south of Highway 101, east of Gravity Circle and west of Synergy Circle.
77	Industrial	Pantoja Trucking	210 320 Hueneme Rd Oxnard, CA	Develop a 2.81-acre undeveloped lot to accommodate overflow truck parking for the operation of an existing freight yard.
78	Institutional	Seabridge K-5 Elementary School	4050 W. Wooley Rd Oxnard, CA	630 student elementary school campus and 2.5-acre park (by Dr Horton).
79	Institutional	Rio Del Valle Middle School Campus Expansion	3100 N Rose Ave Oxnard, CA	Application for Annexation, General Plan Amendment, Pre-zoning, and Special Use Permit to allow for the annexation of unincorporated areas relating to the Rio Del Valle Middle School campus and portions of surrounding agricultural farm field areas. The campus is proposing to expand 11.1-acres to the south to accommodate anticipated future enrollment growth.
80	Mixed Use[4]	115 Palm Dr	115 Palm Dr Oxnard, CA	Remodel an existing single-story, commercial office building and construct 2 two-bedroom residential units. One of the units (696 sf) is proposed over the single-story, 985 square-foot, commercial office building and the second residential unit (767 sf) is

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
				proposed over a detached three-car garage.
81	Mixed Use	613 South C Street Apartment	613 S C St Oxnard, CA	26,308-square-foot five-story mixed-use apartment building with 20 residential units (two affordable), 12 parking spaces, 656 sf of non-residential space, and 1,053 sf of open space on a 0.16-acre project site.
82	Mixed Use	637/643 South C Street Apartment	637 643 S C St Oxnard, CA	57,274-square-foot five-story mixed-use apartment building with 36 residential units (four affordable), 20 parking spaces, 1,619 sf of non-residential space and open space on a 0.32-acre project site.
83	Mixed Use	Sandpiper Apartments	155 N A Street Oxnard CA	56-unit, five-story apartment building on 0.32 acres. Includes two ground floor commercial units.
84	Mixed Use	Palm Dr Mixed-Use Development	140 Palm Dr Oxnard, CA	Proposal to construct a two-story mixed-use development with a 900-square-foot commercial space with three apartment units on a 5,250-square-foot lot.
85	Mixed Use	C Street Apartments	761 S C St Oxnard, CA	Construction of a five-story, 175-unit apartment building. Structure will be podium structure with parking and retail space on ground floor with four levels of studio, one- and two-bedroom units.
86	Mixed Use	Billboard Lofts	800 S A St Oxnard, CA	Construction of a five-story building to include 51 condominiums and 4,024 sf of commercial space.
87	Mixed Use	Rio Urbana	2714 E Vineyard Ave Oxnard CA	Annexation and SUP for 15,000 sf office bldg.
88	Mixed Use	Cooper Rd Mixed-use	600 Cooper Rd Oxnard, CA	Construct a two-story 5,671-square-foot, mixed-use building consisting of 1,437 sf of commercial space on the first floor and 2, two-bedroom apartments on the second floor and four-car garage parking on a 7,640-square-foot lot.
89	Community Planning[5]	Zone text amendment - Wireless Facilities	Oxnard, CA	Update the Oxnard Zoning Code and Coastal Zoning Code in regard to permitting, processing and approving wireless communications applications in the City. Publish aesthetic requirements for the installation of wireless facilities in the City.

TABLE 3-1: **RELATED PROJECTS**

No.	Project Type	Project Name	Location	Description
90	Community Planning	Local Coastal Plan Update	Oxnard, CA	The City of Oxnard's Local Coastal Plan (LCP) Update project is a collaborative planning and outreach process that will revise the City's existing LCP to bring it into conformance with Coastal Commission policy directives and approaches to address climate change adaptation strategies, such as those for sea level rise. The City staff has begun putting together a draft of the LCP document.
91	Community Planning	Teal Club Specific Plan	NE Ventura Rd & Teal Club Oxnard, CA	990 residential units of varying density, single-family, townhomes, condominium, and apartment units; 24 acres, community park; 8 acres public/semipublic use; 4 acres of mixed use, retail, commercial; 10 acres of Business/Research Park. 60,000 sf mixed use and retail; 1-acre fire station site.
92	Community Planning	Ormond Beach Restoration and Access Plan (OBRAP)	Ormond Beach Oxnard, CA	The State Coastal Conservancy (SCC), City of Oxnard and The Nature Conservancy (TNC) have been working together to complete the Ormond Beach Restoration and Access Plan (OBRAP) Preferred Alternative in order to move forward with public outreach.

Source: City of Oxnard, 2025.

[1] *Residential: Projects that provide housing for individuals and families, including single-family homes, townhomes, apartments, and condominiums.*

[2] *Commercial: Projects intended for business, retail, service, hospitality, or office uses, designed to accommodate economic activity and serve residents, employees, and visitors.*

[3] *Industrial: Projects focused on manufacturing, production, warehousing, distribution, or other operations that support goods movement, fabrication, or resource processing.*

[4] *Mixed Use: Projects that integrate two or more different land use types—such as residential, commercial, office, or civic—in a single development or site to create a more dynamic, pedestrian-friendly environment.*

[5] *Community Planning: Plans or initiatives that guide the long-term growth and development of an area, establishing land use patterns, infrastructure needs, and community services to support coordinated and sustainable development.*

4.0 ENVIRONMENTAL ANALYSIS

This section of the Draft Environmental Impact Report (Draft EIR) provides a detailed discussion of the environmental setting for each topic addressed in this Draft EIR, an analysis of the potential impacts of the Maulhardt-Stiles Sub-Neighborhood Plan Project (Sub-Neighborhood Plan or Project), potential cumulative impacts, and the features of the Project and other measures identified to mitigate these impacts as required by the California Environmental Quality Act (CEQA) Guidelines.[1]

[1] California Code of Regulations, Title 14, Section 15000 et seq.

4.1 AESTHETICS AND URBAN DESIGN

This section evaluates the potential for the proposed Project to affect visual resources within the Project Site and surrounding area and its conformance with the general design and aesthetics of the City and surrounding uses. As discussed in the Initial Study (**Appendix A**), impacts associated with the following Thresholds were determined to be less than significant: b) scenic highways, d) compounding existing negative visual character, and e) light and glare. Therefore, further detailed evaluation is not provided for these topics because the Project will not create significant impacts in those areas.

4.1.1 Existing Conditions

Visual Character

The visual characteristics of the City consist of natural and human-made aesthetic resources, including coastline, open space, agricultural areas, low-density commercial and residential development, and higher-density structures associated with the City's downtown skyline. The City is bordered by mountains and the Pacific Ocean, providing a seaside environment with expansive mountain views. The City's development pattern consists of relatively compact urban development focused on the downtown, coastline, harbor, and the Highway 101 corridor.[1] The City's urban landscapes, which contain original historic architectural features with park/plaza features, are also considered aesthetic resources.[2]

As shown in **Figure 3-2: Aerial View of the Project Site,** the Project Site is bordered by North Rose Avenue to the west, a six-lane arterial road; Camino Del Sol to the south, a four-lane arterial road; and Cesar Chavez Drive and Gibraltar Street to the north and east, two-lane residential collector streets.

As shown in **Figures 3-6** to **3-8**, the Project Site is surrounded by urban development consisting of residential neighborhoods, commercial buildings, schools, and parks. The Project Site is bordered by two-story single-family homes to the north across Cesar Chavez Drive; two-story single-family homes, single-story school buildings and East Village Park to the east; single-story single-family homes, two- to three-story multifamily homes, and single-story commercial buildings to the south across Camino Del Sol; and two-story single-family homes to the west across North Rose Avenue. The tallest building in the vicinity of the Project Site is the four-story St. John's Regional Medical Center, approximately 1,000 feet north of the Project Site.

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1 City of Oxnard. *2030 General Plan: Goals and Policies*. Adopted October 2011, amended December 2022. Accessed November 2024. https://www.oxnard.gov/wp-content/uploads/Oxnard-2030-General-Plan-Amend-12.2022-SMc.pdf.

2 City of Oxnard. *2030 General Plan: Goals and Policies*.

Area A, the northern 44.5 acres of the Project Site, is undeveloped land previously disturbed by agricultural operations, and is bordered by North Rose Avenue, Cesar Chavez Drive, Gibraltar Street, East Village Park, and Jacinto Drive.

Area B, the central and southeastern 51 acres of the Project Site, contains the Del Sol High School campus, currently containing two-story-tall classroom buildings and supporting site improvements, including basketball courts, volleyball courts, and surface parking lots. Del Sol High School opened in 2023 and currently serves 472 students in grades 9–12. The northern portion of the campus is only partially developed at this time and consists of vacant land. Additional facilities planned in the northern portion of the campus include softball and baseball fields, sports fields, football field with bleachers, a pool, locker room buildings, tennis courts, and three additional surface parking lots. Prior to development of Del Sol High School and the widening of North Rose Avenue, windrow trees were located on the western edge of the site. These trees were identified as scenic resources in the East Village Phase III Annexation and Del Sol High School EIRs. These trees were removed when the high school was built, and North Rose Avenue was widened, and impacts associated with their removal were fully evaluated in the Del Sol High School EIRs.

Area C, the southwestern 11.8 acres of the Project Site, contains the Maulhardt family residence, barn, cottages, outbuildings, other agricultural structures, and a small lemon orchard that is no longer actively cultivated.

Figures 3-3 to **3-8** present photos of the Project Site and surrounding area.

Scenic Vistas

A scenic vista is an expansive view of a highly valued landscape for the benefit of the general public. Aesthetic components of a scenic vista generally include picturesque quality, sensitivity level and view access. Primary scenic resources identified in the City of Oxnard *2030 General Plan* (General Plan) include the City's beaches, coastline, local waterways and agricultural greenbelts. Other scenic resources such as view corridors include scenic highways, roadways, hills, mountains, and urban landscapes which contain original historic architectural features with park/plaza features. Beyond the City limits, scenic resources include the Coastal Mountain Range west of the City and the hills of Point Mugu State Park, southeast of the City.[3]

The Project Site and adjacent areas do not contain local waterways or agricultural greenbelts.[4] Scenic views from the Project Site include incomplete views of the Coastal Mountain Range to the

3 City of Oxnard. *2030 General Plan: Goals and Policies*.

4 Ventura County Resource Management Agency. *Oxnard Camarillo Greenbelt*. Map. 2011. Accessed November 2024. https://vcrma.org/wp-content/uploads/2024/02/oxnard-and-camarillo-greenbelt-map.pdf.

north of the Project Site, partially obstructed by existing development and trees. Point Mugu State Park is not visible from the Project Site.

4.1.2 Regulatory Framework

Federal

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

State

California Department of Transportation (Caltrans) Scenic Highway Program

Caltrans manages more than 50,000 miles of California's highway and freeway lanes, provides inter-city rail services, permits more than 400 public-use airports and special-use hospital heliports, and works with local agencies. Caltrans achieves its mission of providing a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability, by utilizing six primary programs within Caltrans. The six programs include Aeronautics, Highway Transportation, Mass Transportation, Transportation Planning, Administration, and the Equipment Service Center. Caltrans manages the California Scenic Highway Program, provides guidance, and assists local government agencies, community organizations, and citizens with the process to officially designate scenic highways.

The California Scenic Highway Program was created in 1963, to preserve, protect, and enhance scenic highway corridors from change that would reduce the aesthetic value of lands adjacent to highways. The Scenic Highway Program is contained in the California Streets and Highways Code, Sections 260-263, which is administered by the Caltrans Landscape Architecture Program. Those Sections establish and apply standards for official scenic highways and the development of those highways and adjacent areas, and requires the Caltrans to take into account the concept of the "complete highway," which is a highway incorporating safety, utility, economy, and beauty. Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way, that traverses an area of exceptional scenic quality. Suitability for designation as a State Scenic Highway is based on vividness, intactness, and unity. Streets and Highways Code, Section 263 establishes the system of State Scenic Highways and comprises a list of the highways specified under the system. California Historic Parkways are defined in the Streets and Highways Code, Sections 280-284, as a subset of the State Scenic Highway System.

It is the intent of the Legislature, in designating scenic highways, to assign responsibility for their development. This includes the establishment and application of specific planning and design standards and procedures that are appropriate to each route. The intent also includes indicating, in broad terms, the location and extent of routes and areas that require continued and coordinated planning, design, construction, and regulation of land use and development by state and local

agencies, as appropriate. These efforts are meant to protect the social and economic values provided by the State's scenic resources.[5]

According to the State Scenic Highway Program Route, 150 is listed as a state scenic highway in Ventura County. A portion of Route 101 is an eligible scenic highway but is not "officially designated." There are no official State-designated routes within the City, and the closest scenic highway is a portion of State Route 33, approximately 25 miles northwest of the Project Site.

Local

City of Oxnard, 2030 General Plan

The following goals and policies in the General Plan are applicable to aesthetic resources:

GOAL CD-1 A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.

Policy CD-1.7: ***Compact Development***

Promote the use of development patterns that are more compactly built and use space in an efficient aesthetic manner as part of the community vision.

GOAL CD-3 A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.

Policy CD-3.3: ***Innovative Redevelopment***

Promote innovative design flexibility and possibly different residential densities in public and public/private redevelopment within existing neighborhoods through the use of alternative performance-oriented development standards, alternative development designs, development agreements, specific plans, mixed uses, and other development and planning techniques.

Policy CD-3.4: ***Neighborhood Quality of Life Program***

Develop an ongoing program to assess parking, lighting, traffic safety, use and quality of alleys, public utilities, public and private lighting, housing quality, aesthetics, and related quality of life topics to identify and prioritize opportunities for neighborhood quality of life enhancement activities and

5 Streets and Highways Code – SHC; Division 1. State Highways, Chapter 2. The State Highway System, Article 2.5 State Scenic Highways, California Legislative Information, accessed May 2020, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=SHC&division=1.&title=&part=&chapter=2.&article=2.5.

sources of funding.

GOAL CD-4 Commercial uses compatible with surrounding land uses to meet the present and future needs of Oxnard residents, employees, and visitors.

Policy CD-4.5: ***Commercial Signage***

Require that signage in commercial development improve, rather than detract, from the quality of the surrounding neighborhood.

GOAL CD-7 Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.

Policy CD-7.2: ***Urban Village Compatibility Guidelines***

Develop Urban Village Guidelines that ensure that each urban village area provides appropriate transitional features with the surrounding area, and that each urban village incorporates uses compatible with existing uses.

Policy CD-7.7: ***Urban Village Streetscapes and Identification***

Include streetscape and signage programs in roadway improvements that provide each area a unique identification and enhance the functionality and beauty of entry corridors. Ensure that planned roadway improvements do not conflict with other policies that encourage pedestrian activities and circulation.

GOAL CD-9 A high quality visual image and perception of the City.

Policy CD-9.1: ***Neighborhood Identity***

Recognize, preserve, and improve the visual identity and character of existing neighborhoods. Infill development shall respect historic structures and be of compatible scale and character with historic areas.

Policy CD-9.2: ***Revitalization and Redevelopment***

As part of the City's redevelopment programs and planning, promote the revitalization of residential, commercial, and industrial properties that are deteriorated or detract from the visual quality of the City.

Policy CD-9.3: ***Gateway Enhancement***

Designate major entryways as gateways into the City. The City shall use landscaping, decorative lighting, signage and/or

other streetscape design techniques to enhance the City's identity, sense of place, and provide visual emphasis to the streetscapes into the City.

Policy CD-9.4: ***View Corridor Preservation***

Ensure all public and private investments positively contribute to the overall character of the City by minimizing impacts on important view corridors by creating edge treatments along greenbelt areas and a landscaped buffer corridor of at least 30 feet along designated scenic corridors and other major transportation corridors.

Policy CD-9.5: ***Unique Character Preservation***

Ensure that new public and private investment maintains the unique coastal and agricultural character of the City.

Policy CD-9.6: ***High Rise Development***

Ensure that high-rise buildings are sited and developed so as to mitigate and minimize impacts on adjacent neighborhoods.

GOAL CD-14 Expectations of higher quality design.

Policy CD-14.1: ***Design Review Process***

In the evaluation of development proposals, continue to ensure that public and private development projects comply with City design policies, plans, and guidelines.

GOAL ICS-2 A transportation system that supports existing, approved, and planned land uses throughout the City while maintaining a level of service "C" at designated intersections unless excepted.

Policy ICS-2.11: ***Scenic Highway Preservation***

Preserve and enhance the character of scenic highways, and publicly owned and utility rights-of-way.

Policy ICS-2.12: ***Gateway Enhancements***

Continue to enhance gateways (including but not limited to Ventura Road, Oxnard Boulevard, Vineyard Avenue, Rose Avenue, Rice Avenue, Del Norte Boulevard, Highway-101, Highway 1, Fifth Street, Channel Islands Boulevard, Pleasant Valley Road, Harbor Boulevard, Victoria Avenue, and Hueneme Road).

GOAL ER-6 Protected and enhanced natural setting and scenic resources.

Policy ER-6.1: ***Incorporate Views in New Development***

Preserve important public views and viewsheds by ensuring that the scale, bulk and setback of new development does not significantly impede or disrupt them and ensure that important vistas and view corridors are enhanced. Require development to provide physical breaks to allow views into these vistas and view corridors.

Policy ER-6.2: ***Protect and Enhance Major Scenic Resources***

Protect and enhance the scenic resources of the beaches, Channel Island Harbor, windrows, farmland, the Channel Islands, and surrounding mountains.

Policy ER-6.4: ***Siting of Transmission Lines***

Work with utility companies to avoid transmission lines interfering with scenic views.

Policy ER-6.5: ***Control of Lighting and Glare***

Require that all outdoor light fixtures including street lighting, externally illuminated signs, advertising displays, and billboards use low-energy, shielded light fixtures which direct light downward and, where public safety would not be compromised, encourage the use of low-pressure sodium lighting for all outdoor light fixtures.

Policy ER-6.6: ***New Development Private Open Space***

Ensure that new development incorporates open space areas that provide community and neighborhood identity, private quality exterior private open space for each housing unit, and minimize conflicting land uses and noise generators.

GOAL ER-7 Improved aesthetic quality of major roadways and entrances.

Policy ER-7.1: ***Medians and Parkways***

Ensure that major arterials include landscaped medians and parkways.

GOAL ER-9 Enhanced perceived character and quality of the City of Oxnard.

Policy ER-9.2: ***Enhance Neighborhood Diversity***

Enhance neighborhood diversity and reinforce the desirable elements of neighborhood character and quality through incorporation of design guidelines, use of landscape materials, and encouraging new developments to integrate

historical and culturally significant elements into proposed projects.

Policy ER-9.3: ***Residential Street Lighting***

Provide residential street lighting that is appropriate in appearance, scale, and intensity for residential use.

Policy ER-9.4: Human Scale Development

Ensure that all new development emphasizes a human, pedestrian scale and minimizes its effect on the area's sensitive visual resources.

GOAL ER-10 Enhanced landscape quality with an emphasis on landscape practices, management and plant species that are appropriate to Oxnard and its coastal climate.

Policy ER-10.1: ***Promote use of Native and Water Wise Plants***

Promote the development of a native, drought-tolerant landscape character throughout the City that re-enforces a unified and cohesive landscape character and discourage plants that are invasive or problematic in other ways as determined by the City's landscape architect.

City of Oxnard Zoning

The Project Site is zoned Multiple-Family Residential Planned Development (R-2-PD), General Commercial Planned Development (C-2-PD), and Community Reserve (C-R). The Multiple-Family Residential Planned Development (R-2-PD) zone has a permitted height of two stories, up to 25 feet. The General Commercial Planned Development (C-2-PD) zone has a permitted height of 35 feet, with additional height upon the approval of a special use permit. The Community Reserve (C-R) zone has a permitted height of two stories, not to exceed 25 feet except upon approval of a special use permit.

4.1.3 Significance Thresholds

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

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings such as by creating new development of other physical changes that are visually incompatible with surrounding areas? (Public views are those that are experienced from a 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, such as visual resource policies contained in the 2030 General Plan or other City Planning documents?

4.1.4 Methodology

The evaluation of aesthetic and urban design impacts involves defining the existing visual character, including resources and scenic vistas unique to the Project area. Aesthetic impacts are evaluated by considering proposed grading, landform alteration, building setbacks, scale, massing, typical construction materials, and landscaping features associated with the design of the project. Visual resources are determined by identifying existing landforms, views (e.g., scenic resources such as natural features or urban characteristics), viewing points, locations, and existing light and glare (e.g., nighttime illumination). Guidance provided by the City's General Plan, including its goals, policies, and design guidelines related to community character, scenic resources, and visual quality, is used to assess whether the Project would be consistent with the City's established visual objectives and standards. The visual characteristics of the Project based on the proposed Sub-Neighborhood Plan are then evaluated to determine the extent of change to the visual environment that would result from Project implementation.

Del Sol High School, opened by Oxnard Union High School District (OUHSD) in July 2023, occupies the central 51 acres of the Project Site (Area B). OUHSD prepared and certified the Draft Environmental Impact Report New High School No. 8 (SCH # 2019029101) in November 2019 for the development of the Del Sol High School campus. The proposed Sub-Neighborhood Plan, which would regulate development occurring in Areas A and C, recognizes the presence of Del Sol High School in Area B, which is subject to its own approvals. The New High School No. 8 EIR includes the approval for the construction of the operation of the Del Sol High School campus.

4.1.5 Project Impacts

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

Less than Significant Impact.

The City's General Plan land use designations for the Project Site are Residential Low Medium (RLM), General Commercial (CG) and Park (PRK). The Project Site also has an Urban Village Overlay. General Plan Goal CD-7 includes the "development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity."[6] The Project would implement the City's General Plan Urban Village goals and the proposed Sub-Neighborhood Plan by regulating the development of up to 950 residential dwelling units, a maximum of 40,000 square feet of retail and general commercial space, and public parks within Planning Areas A and C, complementing the development of Del Sol High School in Area B.

As described in **Section 2.0: Project Description**, the proposed Sub-Neighborhood Plan would include a variety of single-family detached residential units, single-family attached residential units,

6 City of Oxnard. *2030 General Plan: Goals and Policies*.

multifamily residential units, and commercial buildings. The housing types would include houses, side yard houses, rowhouses, multiplex apartments, walk-up apartments, podium apartments, and outbuildings. Building height within the Project is determined by zone and building type. As shown in **Figure 2-6: Regulating Plan**, the Project would implement the proposed Sub-Neighborhood Plan's two zones and two overlay zones. The proposed Sub-Neighborhood Plan's Open Zone would accommodate the entire range of allowable building types, and the Neighborhood Zone would consist of house-scale buildings primarily for residential use. The Commercial Overlay would be established within the Open Zone allowing concentrations of commercial uses. The Edge Overlay Zone would be established within the Neighborhood Zone along Cesar Chavez Drive and Gibraltar Street to ensure that new development is compatible with the existing two-story single-family homes along these streets. The overlay would regulate building form, scale, and character by establishing a 2.5-story height limit adjacent to these streets, with taller development concentrated toward the center of the Project Site. As detailed in **Table 2-2: Maximum Building Stories**, the proposed building types would have maximum heights ranging from two to four stories.

As described above, the Project Site is bordered by four- to six-lane arterial roads to the south and west. These arterial roads separate the Project Site from the surrounding uses. The two-lane residential collector streets, Cesar Chavez Drive and Gibraltar Street, on the north and east of the Project Site provide less separation from surrounding uses. The proposed Sub-Neighborhood Plan would establish an Edge Overlay Zone on the northern edge of the Project Site, which would limit the height of buildings to a maximum of 2.5 stories[7] to ensure the scale of new buildings lower in this portion of the site is consistent in form, scale, and character with the existing homes located north of Cesar Chavez Drive and east of Gibraltar Street and to maintain consistency of visibility to scenic vistas from the project and surrounding area.

The Sub-Neighborhood Plan also defines locations for neighborhood parks, including the 1-acre Farmhouse Green, in the southwest corner of the Project Site, that would include the existing farmhouse.

The City's scenic/visual resources include the City's beaches, coastline, local waterways, agricultural greenbelts, view corridors including scenic highways, roadways, hills, and mountains, and urban landscapes which contain original historic architectural features with park/plaza features. Beyond City limits, scenic resources include the Coastal Mountain Range and the hills of Point Mugu State Park, southeast of the City.[8]

As shown in **Figures 3-6** to **3-8**, distant scenic views are partially obstructed by existing development. Views from the Project Site include single-family residences and partially obstructed views of the

7 A half-story is a small floor built above the main floors, tucked under the roof and lit by dormer windows. It can't be larger than 60% of the floor below and is meant to add space without making the building look taller.

8 City of Oxnard. *2030 General Plan: Goals and Policies*.

Coastal Mountain Range to the north; single-family residences, park and school to the east; single- and multifamily residences, commercial, and institutional land uses to the south; and single-family residences to the west. Point Mugu State Park is not visible from the Project Site.

Beaches and Coastlines

Beaches and the coastline are identified in the 2030 General Plan as the City's primary natural scenic resources, including three State beaches, McGrath State Beach, Oxnard State Beach, and Mandalay Beach State Park. Beaches provide unique views of the Pacific Ocean and the offshore Channel Islands on clear days. The Project Site is approximately five miles east of the coastline and associated beaches, and the Project Site does not provide —nor obstruct— scenic views to beaches and the coastline.

The City Municipal Code Section 17-33 defines development standards to ensure the scenic and visual qualities of the City are preserved; however, these standards are only applicable to the City's Coastal Zone and do not apply to the Project Site as the Project Site is not located in the City's Coastal Zone. Implementation of the Project, therefore, would not impact scenic views of beaches and coastlines as identified by the City's General Plan.

Local Waterways

Local waterways identified in the City's General Plan include the City's primary waterway, the Santa Clara River, alongside other smaller waterways, such as the Beardsley Wash and Revolon Slough along the eastern edge of the City. The Project Site is approximately 4.5 miles south of the Santa Clara River and is not adjacent to other waterways. Therefore, due to distance and intervening urban development and topography, the Project would not affect any available public views of local waterways.

Agricultural Greenbelts

Agricultural greenbelts northeast, east, and northwest of the City, including the Oxnard-Camarillo and the Ventura-Oxnard Greenbelts allow unrestricted views of farmland, open space, and distant Coastal Mountain Range that define the region's visual character.[9] The nearest agricultural greenbelt to the Project Site is the Oxnard-Camarillo Greenbelt, approximately 0.75 miles east of the Project Site. As shown in **Figures 3-6** to **3-8**, the Project Site is surrounded by urban development in all directions that consists of buildings that completely block off views of the agricultural greenbelts from the Project Site. Therefore, development of the proposed Sub-Neighborhood Plan would not impact views of these agricultural greenbelt areas.

View Corridors

Other scenic vistas include view corridors from scenic highways. As described above, there are no official State-designated routes within the City, and the closest scenic highway is a portion of State-

9 Ventura County Resource Management Agency. *Oxnard Camarillo Greenbelt*.

Route 33, approximately 25 miles northwest of the Project Site. The City and County have identified a portion of Rose Avenue between Route 101 and Route 1 as a scenic route, as Rose Avenue serves as an image corridor[10] characterized by expansive northerly views of distant mountain ranges.[11] The Project Site is located along this portion of Rose Avenue, as North Rose Avenue bounds the Project Site to the west.

The Project is designed in accordance with the community character policies for scenic resources outlined in the General Plan. As outlined in the General Plan's *CD-9.4 View Corridor Preservation* Goal, developments along designated view corridors must have a landscaped buffer corridor of at least 30 feet.[12] The proposed Project would be consistent with the policy by creating an approximately 30-foot buffer comprised of landscaping and a multi-use path for walking, running and biking along North Rose Avenue. This landscaped buffer would serve as a visual transition zone between the roadway and adjacent development, providing visual relief from building massing and maintaining open views along the designated view corridor. The buffer's landscaping and setback would preserve the visual continuity and scenic character of North Rose Avenue by preventing the obstruction of key sightlines and enhancing the experience for motorists, cyclists, and pedestrians traveling along this prominent roadway. By integrating landscaping and open space design consistent with the City's view corridor objectives, the Project would help maintain the visual openness and aesthetic quality intended by Policy CD-9.4, thereby protecting the visual character of the North Rose Avenue corridor and adjacent scenic resources. Additionally, the loss of a short duration / fleeting existing views for travelers along North Rose Avenue from introduction of the proposed structures would not represent a significant impact to a scenic corridors.

As detailed above, the Project Site has General Plan land use designations of RLM, CG, and PRK and zoning designations of R-2-PD, C-2-PD, and C-R, which would allow a maximum building height of two to three stories. The proposed Sub-Neighborhood Plan would increase the allowable height of buildings in Areas A and C to four stories within the interior portion of the Project Site. As sub-neighborhood plans are adopted by amendment to the Northeast Community Specific Plan (NECSP), sub-neighborhood plans allow for a corresponding General Plan Amendment to change the land use designation for the Project Site and a Zone Change to change the zoning for the Project Site to be consistent with the sub-neighborhood plan. As such, the proposed Sub-Neighborhood Plan would be allowed to change the Project Site's General Plan land use designations from RLM, CG and PRK to Residential High (RH), CG and PRK. The Project Site's zoning designations would change from R-2-PD, C-2-PD and C-R to Specific Plan with sub-zoning designations of Open, Open (Commercial

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10 An image corridor is a visually prominent roadway or route that provides key views of scenic resources and contributes to the community's visual identity and character.

11 City of Oxnard. *East Village Phase III Annexation Draft Environmental Impact Report*. February 2012. Accessed November 2024. https://bda.mwdh2o.com/Board%20Archives/2014/03-March/Letters/064808902.pdf.

12 City of Oxnard. *2030 General Plan: Goals and Policies*.

Allowed), Neighborhood, and Parks and Open Space. The existing Urban Village Overlay would remain in place.

The proposed Project's General Plan Amendment and Zone Change would allow the development of mixed-uses throughout the Project Site and allow a maximum height of four stories for buildings. Additionally, the Urban Village overlay includes a height overlay, which would allow development to have a maximum height of six stories.[13] The proposed Sub-Neighborhood Plan building standards would allow two- to four-story buildings.[14] The proposed Sub-Neighborhood Plan would establish an Edge Overlay zone on the northern edge of the Project Site, which would limit the height of buildings to a maximum of 2.5 stories to ensure the scale of new buildings in this portion of the site is lower and consistent in form, scale, and character with the existing homes located north of Cesar Chavez Drive and east of Gibraltar Street.[15] Therefore, development of the proposed Sub-Neighborhood Plan would not significantly impact view corridors.

Urban Landscapes (Historic Park/Plaza Features)

As detailed in **Section 4.5 Cultural Resources**, Area A is undeveloped, Area B is developed with Del Sol High School and Area C contains the Maulhardt family residence and agricultural buildings that were for agricultural operation. Therefore, the proposed Sub-Neighborhood Plan would not significantly impact urban landscapes that have historic park/plaza features.

Scenic Resources Beyond City Limits (Coastal Mountain Range and Point Mugu State Park)

As discussed above and shown in **Figures 3-6 to 3-8**, there are no views of Point Mugu State Park from the Project Site. There are partially obstructed views of the Coastal Mountain range to the north; however, the proposed Sub-Neighborhood Plan would be developed to complement the existing urban development surrounding the area, including the four-story-tall California Skin Institute, approximately 0.1 mile north of the Project Site. Therefore, the proposed Sub-Neighborhood Plan would not result in significant visual impacts to either Coastal Mountain Range or Point Mugu State Park.

NECSP Scenic Resources

The NECSP identifies that the conversion of agricultural uses within the Specific Plan Area to urban uses would alter the aesthetic character of the area, and the loss of agricultural open space would cause significant aesthetic impacts.[16] However, the Project Site is no longer an agricultural operation, and the Project Site was last cultivated in 2019. As further detailed in **Section 4.2:**

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13 City of Oxnard. *2030 General Plan: Goals and Policies*.

14 Sargent Town Planning. *Sub-Neighborhood Plan Oxnard Northeast Community Plan Specific Plan Update*. July 2024.

15 Sargent Town Planning. *Sub-Neighborhood Plan Oxnard Northeast Community Plan Specific Plan Update*. July 2024.

16 City of Oxnard. *Northeast Community Specific Plan.* December 1993.

Agricultural Resources, the Project Site is developed with the Del Sol High School and surrounded by sensitive receivers, which would not allow agricultural operations to be feasible anymore. Therefore, the proposed Sub-Neighborhood Plan would not convert agricultural uses and would have less than significant impact to NECSP scenic resources.

As discussed above, the proposed Sub-Neighborhood Plan would be developed in accordance with the development regulations of the NECSP, General Plan, zoning designations, and Urban Village Overlay. The proposed Sub-Neighborhood Plan would not substantially alter existing views or scenic resources identified in the City's General Plan or NECSP and, therefore, would result in less-than-significant impacts.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings such as by creating new development of other physical changes that are visually incompatible with surrounding areas? (Public views are those that are experienced from a 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, such as visual resource policies contained in the 2030 General Plan or other City Planning documents?

Less than Significant Impact.

The Project Site is located in an urbanized portion of the City, surrounded by urban development on all sides. **Table 4.1-1: Consistency with General Plan** and **Table 4.1-2: Consistency with Northeast Community Specific Plan (NECSP)** analyze the consistency of the Project with applicable goals, policies, and objectives in the City's General Plan and NECSP.

According to the consistency procedure outlined in Chapter 9 of the 2030 General Plan, the City has a three-level policy consistency determination defined by the relationship between the 2030 General Plan goal and its representative implementing policies and the proposed Project. The three levels are:

1. Direct Applicability to the proposed Project
2. Related or Indirect Applicability to the proposed Project
3. No or Distant Applicability to the Proposed Project

For Level I policies, if a proposed Project furthers at least one of the goal's implementing policies and otherwise does not inhibit achievement of remaining policies, the Project is consistent. For Level II policies, if a proposed Project does not significantly inhibit achievement of the goal or its implementing policies, the Project is consistent. Level III policies are not included in **Table 4.1-1** because they are not applicable to the Project. Applicable Level I and Level II policies are included and are identified as either Level I or II in the narrative discussion.

TABLE 4.1-1: CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Consistency Analysis
Balanced Community	
Goal CD-1 **A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.**	
Policy CD-1.5 Housing Variety Promote the development of a variety of housing types throughout the City including apartments, condominiums, lofts, townhouses, and attached and detached single family units.	**Level I - Consistent.** The proposed Sub-Neighborhood Plan would allow a variety of housing types within the Project Site, including houses, side yard houses, rowhouses, multiplexes, walk-up apartments, podium apartments, and outbuildings. Therefore, the Project is consistent with this policy.
Policy CD-1.7 Compact Development Promote the use of development patterns that are more compactly built and use space in an efficient aesthetic manner as part of the community vision.	**Level II - Consistent**. High-density residential zones are 30 or more dwelling units per acre and medium-high zones are 18 to 30 dwelling units per acre, as described in the City's General Plan. The proposed Sub-Neighborhood Plan would promote higher-density and more compact development compared to the existing General Plan land use designations for the Project Site with a density ranging from 6 to 46 du/ac. Additionally, the proposed Sub-Neighborhood Plan standards would ensure development is visually compatible with surrounding development. For example, the proposed Sub-Neighborhood Plan includes an Edge Overlay Zone that would limit the height of buildings at the edges of the site to be compatible in height with existing development across the streets in form, scale, and character. For these reasons, the Project is consistent with this policy.
Policy CD-1.8 Natural Resource Conservation Promote a high quality of life within the community, incorporating the retention of natural open space areas, greenbelts, and the provision of adequate recreational facilities.	**Level II - Consistent.** As discussed in **Section 4.15: Public Services and Recreation**, the proposed Sub-Neighborhood Plan would provide adequate recreational activities by developing the East Village Park extension, the West Green Park, the North Neighborhood Pocket Parks, the Farmhouse Green Park and the multi-use path. Therefore, the Project is consistent with this policy.
Neighborhood Stabilization and Revitalization	
Goal CD-3 **A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.**	
Policy CD-3.4: Neighborhood Quality of Life Program Develop an ongoing program to assess parking, lighting, traffic safety, use and quality of alleys, public utilities, public and private lighting, housing quality, aesthetics, and related quality of life topics to identify and prioritize opportunities for	**Level II - Consistent.** Regarding aesthetics, the proposed Project would be developed with an Edge Overlay that would provide consistent development scale to adjacent residential development. Additionally, the proposed Project would have commercial

TABLE 4.1-1: CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Consistency Analysis
neighborhood quality of life enhancement activities and sources of funding.	development and parking in the rear of buildings to provide an aesthetic and walkable neighborhood. Regarding lighting, the Project is consistent with the City's Municipal Code Section 16-320 lighting regulations. Therefore, the Project is consistent with this policy.
Compatible Commercial Development	
Goal CD-4 **Commercial uses compatible with surrounding land uses to meet the present and future needs of Oxnard residents, employees, and visitors.**	
Policy CD-4.5: Commercial Signage Require that signage in commercial development improve, rather than detract, from the quality of the surrounding neighborhood.	**Level I - Consistent.** The proposed commercial uses would have signage that would be consistent with the sign standards established in the City's Municipal Code Section 16-610. Currently, the Project Site contains uncultivated farmland that detracts the aesthetic quality of the urban development surrounding the Project Site. Introduction of signage to the area would complement the planned urban character of the surrounding development, rather than detract from the quality of the surrounding neighborhood. Therefore, the Project is consistent with this policy.
Urban Villages	
Goal CD-7 **Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.**	
Policy CD-7.2: Urban Village Compatibility Guidelines Develop Urban Village Guidelines that ensure that each urban village area provides appropriate transitional features with the surrounding area, and that each urban village incorporates uses compatible with existing uses.	**Level I - Consistent.** The proposed Sub-Neighborhood Plan defines an Edge Overlay zone on the northern edge of the Project Site limiting the height of buildings to 2.5 stories to provide an appropriate transition with the existing residential neighborhood located north of Cesar Chavez Drive and east of Gibraltar Street. Additionally, the proposed residential, commercial, and park uses would be consistent with the surrounding residential, commercial and park uses. Therefore, the Project is consistent with this policy.
Policy CD-7.7 Urban Village Streetscapes and Identification Include streetscape and signage programs in roadway improvements that provide each area a unique identification and enhance the functionality and beauty of entry corridors. Ensure that planned roadway improvements do not conflict with other policies that encourage pedestrian activities and circulation.	**Level I - Consistent.** The proposed Sub-Neighborhood Plan includes streetscape and signage plans and standards that would be consistent with the procedures and standards of Chapter 16, Article IX of the Oxnard City Code, and Division 3 as applicable, which establish the City's requirements for coordinated, high-quality urban design. These standards guide the placement and design of signs, landscaping, lighting, sidewalks, and other public-realm features to ensure

TABLE 4.1-1: CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Consistency Analysis
	visual harmony and pedestrian comfort throughout new development. The proposed Project would include pedestrian amenities such as sidewalks, bike lanes, multi-use paths, and parks that would encourage pedestrian circulation and connectivity. All roadways and improvements would be designed to be consistent with the City's standards. Therefore, the Project is consistent with this policy.
Urban Design	
Goal CD-9 **A high quality visual image and perception of the City.**	
Policy CD-9.1: Neighborhood Identity Recognize, preserve, and improve the visual identity and character of existing neighborhoods. Infill development shall respect historic structures and be of compatible scale and character with historic areas.	**Level I - Consistent.** As detailed in **Section 4.5 Cultural Resources**, the Maulhardt residence, barn and garage in Area C are eligible to be a historic resource under the national and state criteria. Additionally, some of the other structures in Area C or cultural points of interest. Although the development of the proposed Project would require the demolition of all structures in Area C, a Structural Inspection Report found that the buildings do not meet current building safety codes and are infeasible to be relocated. The proposed Project would develop the one-acre Farmhouse Green Park in Area C that provides the opportunity to preserve the Maulhardt family to recognize the importance the Maulhardt family had in the City's agricultural history. Therefore, the Project is consistent with this policy.
Policy CD-9.4 View Corridor Preservation Ensure all public and private investments positively contribute to the overall character of the City by minimizing impacts on important view corridors by creating edge treatments along greenbelt areas and a landscaped buffer corridor of at least 30 feet along designated scenic corridors and other major transportation corridors.	**Level I - Consistent.** North Rose Avenue, adjacent to the Project Site, is identified as a scenic route by the City's General Plan. As detailed in this section, the Project is consistent with this policy by developing a 30-foot-wide landscaped buffer along North Rose Avenue to preserve the views of the partially obstructed Coastal Mountain Range north of the Project Site. Therefore, the Project is consistent with this policy.
Policy CD-9.5 Unique Character Preservation Ensure that new public and private investment maintains the unique coastal and agricultural character of the City.	**Level II - Consistent.** As discussed above in Threshold a of Section 4.1.5, the Project is not located near the City's coastline or agricultural greenbelts. Therefore, the Project is consistent with this policy.

TABLE 4.1-1: CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Consistency Analysis
Higher Quality Design	
Goal CD-14 Expectations of higher quality design.	
Policy CD-14.1 Design Review Process In the evaluation of development proposals, continue to ensure that public and private development projects comply with City design policies, plans, and guidelines.	**Level II - Consistent.** The Project would implement the City's vision for the establishment of an "Urban Village" by developing a variety of land uses on the Project Site, including residential, commercial, and open space uses; provides a mix of residential types and densities; would have 15 percent of residential units designated for affordable housing; is located along corridors such as Rose Avenue and transit such as GCTD; and provides pedestrian amenities such as multi-use paths, paseos, sidewalks and bicycle lanes. The proposed NECSP Sub-Neighborhood Plan contains design guidelines for the development of the Project. Therefore, the Project is consistent with this policy.
Aesthetic, Scenic, and Landscape Resources	
Goal ER-6 Protected and enhanced natural setting and scenic resources.	
Policy ER-6.1 Incorporate Views in New Development Preserve important public views and viewsheds by ensuring that the scale, bulk and setback of new development does not significantly impede or disrupt them and ensure that important vistas and view corridors are enhanced. Require development to provide physical breaks to allow views into these vistas and view corridors.	**Level I - Consistent.** As detailed Threshold a of Section 4.1.5, the Project would not significantly impact available scenic vistas or views of scenic resources. Additionally, the proposed Sub-Neighborhood Plan contains setback requirements to reduce impacts to public views and viewsheds. Therefore, the Project is consistent with this policy.
Policy ER-6.2 Protect and Enhance Major Scenic Resources Protect and enhance the scenic resources of the beaches, Channel Island Harbor, windrows, farmland, the Channel Islands, and surrounding mountains.	**Level II - Consistent.** As detailed Threshold a of Section 4.1.5, the Project would not impact the City's major scenic resources. The Project Site contains views of the Coastal Mountain Range; however, these views are partially obstructed by existing development and associated landscaping. Furthermore, future development would be consistent with the proposed Sub-Neighborhood Plan, which contains design guidelines such as landscaped buffers to minimize effects to scenic resources. Therefore, the Project is consistent with this policy.
Policy ER-6.5 Control of Lighting and Glare Require that all outdoor light fixtures including street lighting, externally illuminated signs, advertising displays, and billboards use low-energy, shielded light fixtures which direct light downward and, where public safety would not be	**Level II - Consistent.** As detailed in the Initial Study (IS) in **Appendix A**, the Project would be developed consistent with the lighting principles contained in the Community Design Element of the General Plan and the Oxnard Municipal Code, including the City's MC Section 16-320, reducing light and glare impacts to less than

TABLE 4.1-1: CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Consistency Analysis
compromised, encourage the use of low-pressure sodium lighting for all outdoor light fixtures.	significant. Therefore, the Project is consistent with this policy.
Policy ER-6.6 New Development Private Open Space Ensure that new development incorporates open space areas that provide community and neighborhood identity, private quality exterior private open space for each housing unit, and minimize conflicting land uses and noise generators.	**Level I - Consistent.** The Project includes parks and open space areas under the Power of 10 concept for use by residents of various ages. The proposed parks would be spread throughout Areas A and C. Additionally, the parks and open space areas would connect residents to commercial uses, alternative transportation modes such as bus stops and connecting to other parts of the City, creating a walkable neighborhood and a neighborhood identity. Therefore, the Project is consistent with this policy.
Roadway Aesthetics	
Goal ER-7 Improved aesthetic quality of major roadways and entrances.	
Policy ER-7.1 Medians and Parkways Ensure that major arterials include landscaped medians and parkways.	**Level II - Consistent.** The proposed Sub-Neighborhood Plan would provide a landscaped parkway and multi-use path along North Rose Avenue, a major arterial. Therefore, the Project is consistent with this policy.
Enhanced Character	
Goal ER-9 Enhanced perceived character and quality of the City of Oxnard.	
Policy ER-9.2 Enhance Neighborhood Diversity Enhance neighborhood diversity and reinforce the desirable elements of neighborhood character and quality through incorporation of design guidelines, use of landscape materials, and encouraging new developments to integrate historical and culturally significant elements into proposed projects.	**Level I - Consistent.** The proposed Sub-Neighborhood Plan would create new neighborhoods with a unique character and diversity of residential, commercial, public facility, and open space consistent with the City's "Urban Village" policies. As part of the Urban Village policies, 15% of the residential units would be either sold or rented as affordable housing, increasing diversity for the neighborhood. The Sub-Neighborhood Plan includes the Farmhouse Green, a 1-acre green space that could include the existing Maulhardt residence, a historic resource, located in Area C. Therefore, the Project is consistent with this policy.
Policy ER-9.3 Residential Street Lighting Provide residential street lighting that is appropriate in appearance, scale, and intensity for residential use.	**Level II - Consistent.** The Project would be developed consistent with the lighting principles and residential lighting standards contained in the Community Design Element of the General Plan and the Oxnard Municipal Code Section 16-320, which would ensure that the proposed Project's residential lighting would be appropriate in appearance, scale and intensity. Therefore, the Project is consistent with this policy.

TABLE 4.1-1: CONSISTENCY WITH GENERAL PLAN	
Goals and Policies	**Consistency Analysis**
Policy ER-9.4 Human Scale Development Ensure that all new development emphasizes a human, pedestrian scale and minimizes its effect on the area's sensitive visual resources.	**Level II - Consistent.** The Project would prioritize human and pedestrian views. The proposed Sub-Neighborhood Plan design guidelines would create human-scale, pedestrian-oriented development and minimize effects on sensitive visual resources. For example, there would be an edge overlay that would ensure that buildings adjacent to single-family houses would be similar height to the built environment. Additionally, there would be multi-use trails and commercial uses that would further provide pedestrian uses and views. Therefore, the Project is consistent with this policy.
Landscaping and Trees	
Goal ER-10	**Enhanced landscape quality with an emphasis on landscape practices, management and plant species that are appropriate to Oxnard and its coastal climate.**
Policy ER-10.1 Promote use of Native and Water Wise Plants Promote the development of a native, drought-tolerant landscape character throughout the City that re-enforces a unified and cohesive landscape character and discourage plants that are invasive or problematic in other ways as determined by the City's landscape architect.	**Level II - Consistent.** The proposed Sub-Neighborhood Plan contains landscaping guidelines requiring use of native water-conserving vegetation. A landscape architect would ensure that the landscaping guidelines are followed prior to the approval of future construction of Areas A and C. Therefore, the Project is consistent with this policy.

Source: City of Oxnard. *2030 General Plan*. Accessed November 2024. https://www.oxnard.gov/wp-content/uploads/Oxnard-2030-General-Plan-Amend-12.2022-SMc.pdf.

TABLE 4.1-2: CONSISTENCY WITH NORTHEAST COMMUNITY SPECIFIC PLAN (NECSP)	
Goals	**Consistency Analysis**
General	
Objective 1: Provide an environment that would encourage neighborhood interaction and strengthen neighborhood cohesiveness.	**Consistent**. The Project consists of an "Urban Village," which would connect existing streets and surrounding developed areas that are not currently connected. Additionally, there would be parks, open space and neighborhood serving commercial land uses that would promote neighborhood interaction. Therefore, the Project is consistent with this objective.
Objective 2: Provide a balanced mix of residential, commercial and institutional uses in a compatible manner and arrangement.	**Consistent**. The Project consists of a mixed-use urban development including residential, commercial, public facility and open space uses scaled to be compatible with

TABLE 4.1-2: CONSISTENCY WITH NORTHEAST COMMUNITY SPECIFIC PLAN (NECSP)

Goals	Consistency Analysis
	the surrounding areas. Therefore, the Project is consistent with this objective.
Objective 6: Blend the development of the NECSP Area with the adjacent communities.	**Consistent.** The proposed Sub-Neighborhood Plan would ensure development of the Project Site blends with the scale and character of the surrounding neighborhoods as described in Threshold a of Section 4.1.5. Therefore, the Project is consistent with this objective.
Objective 7: Ensure compatibility with adjacent, existing neighborhoods.	**Consistent.** The proposed uses would be consistent and compatible with surrounding uses with residences, commercial buildings, schools and parks. The proposed Sub-Neighborhood Plan would ensure development of the Project Site is compatible in character of the surrounding neighborhoods as described in Threshold a of Section 4.1.5. Therefore, the Project is consistent with this objective.
Design Guideline Objective 3: Establish specific landscape guidelines and standards to coordinate physical appearance throughout the SP area.	**Consistent.** The proposed NECSP Sub-Neighborhood Plan includes landscape guidelines that will result in a coordinated physical appearance throughout the Project Site. Therefore, the Project would be consistent with this objective.

Source: City of Oxnard. *Northeast Community Specific Plan.* December 1993.

As discussed in in *Threshold (a)* of *Section 4.1.5*, the proposed Sub-Neighborhood Plan would allow a corresponding General Plan land use Amendment and Zone Change to allow the development of the proposed Sub-Neighborhood Plan that would allow mixed-use development up to four stories tall. Therefore, the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality, resulting in less than significant impacts.

4.1.6 Cumulative Impacts

The City's 2030 General Plan Program EIR determined that while development allowed by the General Plan could result in permanent changes to the area's visual character, the cumulative impact of this development on the visual character of the City would be less than significant. This conclusion was based on policies in the General Plan to preserve identified scenic resources and views and require discretionary reviews of individual development projects to ensure consistency with applicable policies.

As detailed above, the proposed Sub-Neighborhood Plan would be consistent with the General Plan's Urban Village designation for the Project Site. The Project would be consistent with the City's applicable aesthetic policies and would be designed to preserve the visual character of the area and

not significantly impact views of surrounding scenic resources. Therefore, the Project would not contribute to any significant cumulative impacts.

4.1.7 Level of Significance Without Mitigation

Impacts would be less than significant without mitigation.

4.1.8 Mitigation Measures

No mitigation measures are required.

4.1.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

4.2 AGRICULTURAL RESOURCES

This section evaluates the effects of the Project on Agricultural Resources. As discussed in the Initial Study (**Appendix A**), no potential significant impacts were identified for the following Thresholds: b) conflict with existing zoning for agricultural use or a Williamson Act contract, and c) conversion of off-site farmland. Therefore, further detailed evaluation of these topics is not provided in this section because the Project will not create significant impacts in those areas.

4.2.1 Existing Conditions

County of Ventura

A Mediterranean climate with mild summer and winter temperatures, low frost occurrence, flat and fertile soil, and an average of about 14 inches of rain per year combine to create high-quality and productive agricultural land in the Oxnard Plain. The Oxnard Plain is a broad, flat alluvial plain formed by sediment deposits from the Santa Clara River and surrounding watersheds, and it contains some of the most productive agricultural soils in Ventura County. The Project Site is located within this plain, and its flat topography and fertile soils have historically supported agricultural operations on and around the Project Site.

Table 4.2-1: Ventura County Annual Agricultural Crop Report shows the 2023 and 2024 values of major crop groupings in Ventura County. Gross revenue sales of agricultural products in the County of Ventura (County) increased approximately 7% from approximately $2.12 billion in 2023 to approximately $2.31 billion in 2024. The largest increase in crop values from 2023 to 2024 was in the fruit and nut crops grouping. The largest decrease in crop values from 2023 to 2024 was in the livestock and poultry grouping.

TABLE 4.2-1: VENTURA COUNTY ANNUAL AGRICULTURAL CROP REPORT

Crop Grouping	2023 Crop Value	2024 Crop Value
Fruit and Nut Crops	$1,379,162,000	$1,481,362,000
Vegetable Crops	$486,110,000	$579,580,000
Nursery Stock	$208,169,000	$186,669,000
Cut Flowers	$30,515,000	$29,872,000
Field Crops	$6,006,000	$11,586,000
Livestock & Poultry	$43,282,000	$8,556,000
Biological Control[1]	$7,595,000	$7,921,000
Apiary Products	$9,404,000	$7,010,000

TABLE 4.2-1: VENTURA COUNTY ANNUAL AGRICULTURAL CROP REPORT		
Crop Grouping	**2023 Crop Value**	**2024 Crop Value**
Total	**$2,170,243,000**	**$2,312,556,000**

[1] Biological Control refers to commercial beneficial insects used for pest management.

Source: County of Ventura. *County of Ventura 2024 Crop & Livestock Report*. 2025. https://awm.venturacounty.gov/wp-content/uploads/2025/07/2024-CR-English-Pages.pdf.

Regional Conversion of Farmlands

Conversion of farmlands is the loss of farmlands due to non-agricultural development or land use changes that no longer support agricultural production. The California Department of Conservation (DOC) has developed a classification system to categorize the quality of agricultural land resources. The DOC Farmland Mapping and Monitoring Program (FMMP) provides biennial agricultural land conversion information by class for decision-makers to use in their planning for the present and future of California's agricultural land resources.

Important Farmlands

The U.S. Soil Conservation Service's Important Farmlands Inventory (IFI) system is used to inventory lands with high agricultural value. This system divides farmland into classes based on productive capability of the land (rather than the mere presence of ideal soil conditions). The important farmlands map identifies five agriculture-related categories: 1) prime farmland, 2) farmland of statewide importance, 3) unique farmland, 4) farmland of local importance, and 5) grazing land. A description of each of these categories is provided below.

- *Prime Farmland*. Prime farmland is land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been used for the production of irrigated crops during the two update cycles prior to the most recent mapping date (the most recent map update for the Project Site is 2016).
- *Farmland of Statewide Importance*. Farmland of statewide importance is land similar to prime farmland, but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date (the most recent map update for the Project Site is 2016).
- *Unique Farmland*. Unique farmland is land of lesser quality soils used for the production of the State's leading agricultural crops (i.e., crops of high economic value, such as oranges, olives, avocados, rice, grapes, and cut flowers). This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones of California. The land must have been cultivated during the two update cycles prior to the mapping of 2016.
- *Farmland of Local Importance*. Farmland of local importance to the local agricultural economy, as determined by each County's Board of Supervisors and a local advisory committee. In Ventura

County, farmland of local importance has been identified as soils that are listed as prime farmland or farmlands of statewide importance that are not irrigated, and soils growing dryland crops—beans, grain, dryland walnuts, and dryland apricots.

- *Grazing Land*. Grazing land is land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for this category is 40 acres.

The conversion of farmland in Ventura County from 2016 to 2018 (the most recent information available) is based on information from the FMMP and is illustrated in **Table 4.2-2: Important Farmland Conversion in Ventura County**. As indicated in **Table 4.2-2**, the County experienced a 0.20% (240 acres) decrease in important farmland, 0.06% (124 acres) decrease in grazing land, and a 0.12% (264 acres) decrease in agricultural land from the period of 2016 to 2018.

TABLE 4.2-2: IMPORTANT FARMLAND CONVERSION IN VENTURA COUNTY

Important Farmland Category	Acreage Inventoried		Acreage Change (+/-)[1]	Percentage Change (+/-)
	2016	2018		
Prime Farmland	40,976	40,764	-214	-0.52
Farmland of Statewide Importance	32,992	32,926	-73	-0.22
Unique Farmland	28,949	28,764	-184	-0.64
Farmland of Local Importance	15,591	15,818	231	1.48
Important Farmland Subtotal[2]	*118,508*	*118,272*	*-240*	*-0.20*
Grazing Land	197,859	197,714	-124	-0.06
Agricultural Land Total	**316,367**	**315,986**	**-364**	**-0.12**

Note:

[1] *2016-2018 acreage changes calculate conversions within existing mapped area; County boundary adjustment acreages not included.*

[2] *The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) defines "Important Farmland" to include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. Under CEQA Guidelines Appendix G, only Prime, Statewide, and Unique Farmland are expressly identified; however, Ventura County includes Farmland of Local Importance in its Important Farmland inventory for local planning purposes.*

Source: DOC. *2016-2018 Farmland Conversion Report*. 2019. https://www.conservation.ca.gov/dlrp/fmmp/Pages/2016-2018_Farmland_Conversion_Report.aspx

City of Oxnard

The City of Oxnard is located within the Oxnard Plain, which contains some of the most fertile land in Ventura County. Agricultural areas are found on the northeastern and eastern edges of the City, as well as some large remaining agricultural tracts within the northwestern portion of the City's limits. These islands include green buffers surrounding the developed areas and are marked by tall eucalyptus and cypress windrows. In 2006, according to the California DOC, there was approximately 23,380 acres of agricultural land in the City's limits.

The City's General Plan Section 3.4 designates approximately half of the City's limits for agricultural use. The Project Site is located within the City Urban Restriction Boundary (CURB), a voter-approved boundary line for urban development.[1] The CURB establishes the limit beyond which urban development cannot occur without voter approval, thereby protecting agricultural lands outside the boundary from conversion to non-agricultural uses. Because the Project Site is located inside the CURB, it is an area where the City has planned for future urban development, and agricultural uses within this portion of the City are not intended to remain long-term. As a result, agricultural lands on the Project Site are already anticipated for transition to urban uses under the General Plan.

Project Site

The Project Site was first used for agriculture in 1872 with the last cultivation occurring in 2019. Area A is currently undeveloped, consisting of land disturbed by past agricultural use and last cultivated in 2019; Area B is developed with Del Sol High School, opened by Oxnard Union High School District in July 2023; and Area C contains the Maulhardt family residence, barn, cottages, outbuildings, other related structures, and a small lemon orchard that was last cultivated in 2019.

As shown in **Figure 4.2-1: Important Farmland Categories**, most of the Project Site is categorized on the latest DOC FMMP with approximately 96.3 acres of Prime Farmland and approximately 9.6 acres of Farmland of Statewide Importance. The remaining 1.2 acres consist of Urban and Built-Up Land. It should be noted that the latest Important Farmland information is based on 2020 data, when Del Sol High School was not developed yet in Area B. At that time, Area B contained farmland comprised of Prime Farmland and Farmland of Statewide Importance, but is now fully developed with the high school.

4.2.2 Regulatory Framework

Federal

No federal policies or regulations pertaining to agricultural resources are applicable to the proposed Project.

[1] City of Oxnard. *2030 General Plan*. December 2016. Accessed April 2025. https://www.oxnard.gov/community-development/long-range-planning-sustainability/general-plan.



SOURCE: Department of Conservation - 2020

FIGURE **4.2-1**

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Important Farmland Categories

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State

Important Farmlands

The Department of Conservation Farmland Mapping and Monitoring Program (FMMP) prepares, updates, and maintains Important Farmland Series Maps (Maps) as defined in subdivision (f) of Section 65560 of the Government Code, and prepares and maintains an automated map and database system to record and report changes in the use of agricultural lands every two years on even numbered calendar years.

Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The Maps are based on categories of agricultural land defined by the U.S. Department of Agriculture land inventory and monitoring criteria, and considers all information collected or received on the amount of land converted to or from agricultural use, and between agricultural categories.

The categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance designations are commonly referred to as "Important Farmlands," as impacts to these categories of farmland are recognized as significant impacts under CEQA.

Williamson Act Contracts

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use.[1] Landowners that entering these contracts receive reduced property tax assessments. Private land within locally designated agricultural preserve areas is eligible for enrollment under a Williamson Act contract. The Williamson Act program is administered by DOC, in conjunction with local governments that administer the individual contract arrangements with landowners. Under the Williamson Act, a landowner commits the parcel to a 10-year period during which time no conversion from agricultural or open space use is permitted. Each year, the contract automatically renews unless a notice of nonrenewal or cancellation is filed.

Local

Greenbelts

In Ventura County, the cities and the County have established Agricultural Greenbelt policies by resolution or ordinance to preserve agricultural land. These greenbelts represent a form of mutual policy control between two or more jurisdictions concerning urban form, the protection of farmland and open space, and the future extension of urban services/facilities and annexations. Greenbelts are intended to operate as "community separators" or "buffers" and participating cities agree not to extend municipal services into the greenbelts or annex greenbelt lands. Greenbelt agreements usually have no binding legal authority to regulate land uses except that they require amendment and consent of all parties to remove an area from the greenbelt.

The City of Oxnard is a party to two greenbelt agreements, the Oxnard-Camarillo Greenbelt Agreement and the Ventura-Oxnard Greenbelt Agreement. The Oxnard-Camarillo Greenbelt Agreement was established in 1982 and covers 27,000 acres in unincorporated Ventura County between the Cities of Oxnard and Camarillo. The Ventura-Oxnard Greenbelt includes an additional 5,100 acres of unincorporated County land between the Cities of Oxnard and Ventura; the agreement, initially established in 1994 by the Cities of Ventura, Oxnard, and Ventura County as a policy-oriented resolution, is now formalized under Ventura County Ordinance No. 4474. This Ordinance articulates the County's commitment to conserving agricultural and open space lands between Oxnard and Ventura. The Project Site is not located within or adjacent to either greenbelt, as shown in **Figure 4.2-2: Greenbelts**. Therefore, the development of the proposed Sub-Neighborhood Plan would not impact greenbelts.

Save Open Space and Agricultural Resources

The City adopted the Save Open Space and Agricultural Resources (SOAR) Ordinance establishing the Oxnard City Urban Restriction Boundary (CURB) in November 1998. In 2016 the City renewed the SOAR Ordinance through the year 2050 via voter-approved Measure L (Oxnard Ordinance No. 2924). The purpose of this Ordinance is to establish the CURB to limit the conversion of agricultural land in the City's limits to non-agricultural use unless such a change is submitted to voters for approval in accordance with the Ordinance requirements. The goals of the Oxnard CURB include:

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

The Oxnard SOAR Ordinance restricts urban services and urbanized uses to land located within the CURB through December 2050, except for the purpose of completing roadways designated in the Infrastructure and Community Services chapter of the 2030 General Plan, construction of public

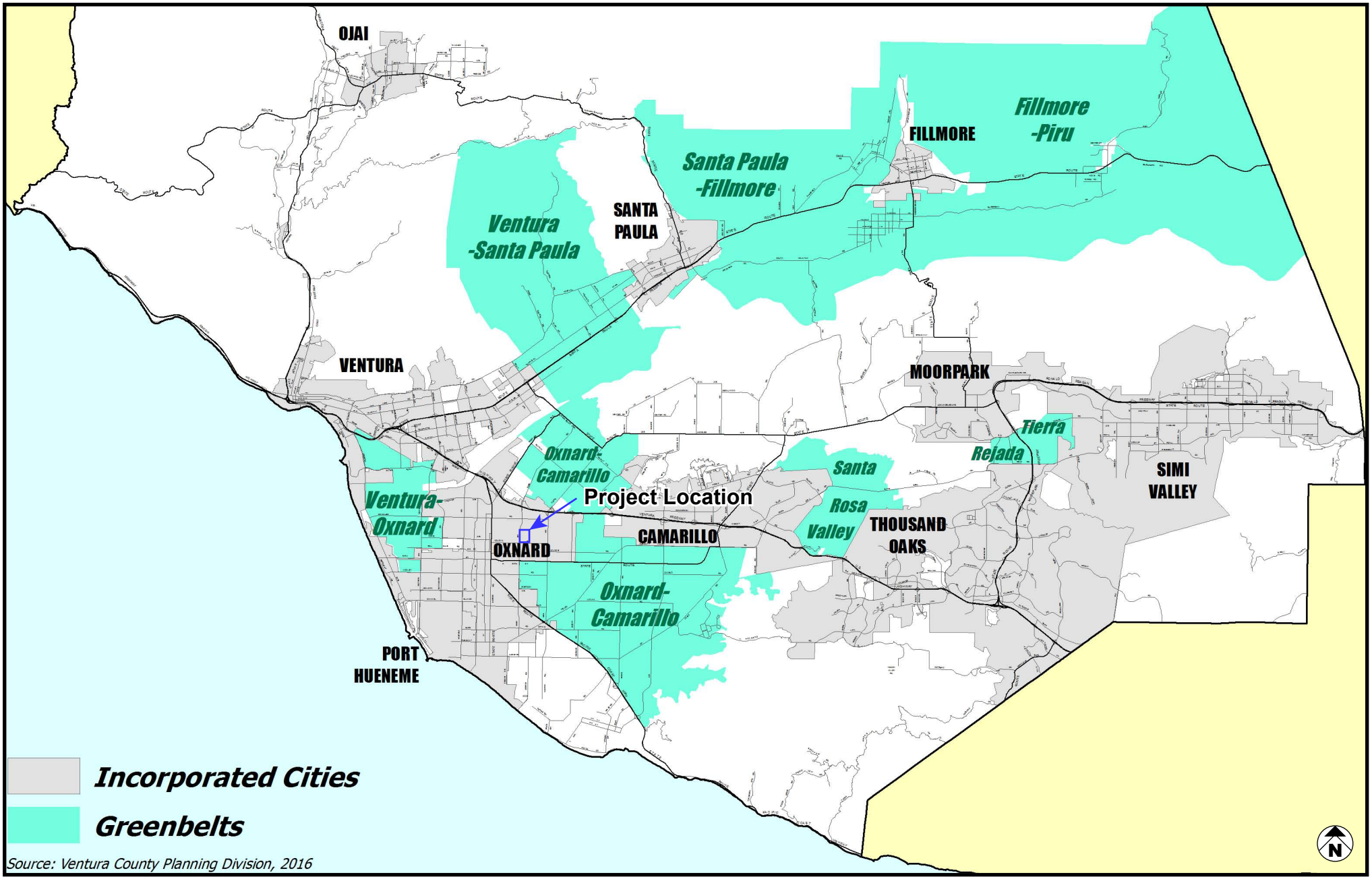


FIGURE **4.2-2**

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Greenbelts

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potable water facilities, public schools, public parks or other government facilities, or any development project that has obtained, as of the effective date of the SOAR Ordinance, a vested right pursuant to state or local law, meaning the project has already received the necessary approvals to proceed and therefore is legally allowed to continue regardless of later changes to land use regulations.[2]

The SOAR Ordinance defines urbanized uses of land as "any development which would require the establishment of new city sewer systems or the significant expansion of existing city sewer infrastructure; or would create residential lots less than 10 acres in area per primary residence; or would result in the establishment of commercial or industrial uses which are neither exclusively related to agriculture nor exclusively related to the production of mineral resources." The Project Site is fully within the CURB as shown in **Figure 4.2-3: Jurisdictional Boundaries**, which means that the Project Site is located in an area that is planned for development and would not convert agricultural land that hasn't already been planned for development.

City of Oxnard General Plan Goals and Policies

The City of Oxnard General Plan addresses the conservation, development, and use of natural resources, and also explores the managed production of resources, significant buildings and historic sites, water resources, biological, and agricultural resources.[3]

The following goals and policies in the City of Oxnard Environmental Resources Element address agricultural resources in the City's limits:

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

Policy ER-1.2 ***Protect Surrounding Agriculture and Open Space***

Protect open space and agricultural uses around Oxnard through continued adherence to the Guidelines for Orderly Development, Ventura Greenbelt programs, the Save Open-Space and Agricultural Resources Ordinance, and other programs or policies that may subsequently be adopted such as the SB 375 Sustainable Communities Strategy.

Goal ER-12 A viable agricultural industry, maintained and enhanced soil resources, reduced erosion, and improved agricultural productivity.

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2 Save Open Space & Agricultural Resources (SOAR). "Oxnard SOAR Initiative (Measure L CURB) passed in November 2016." *Soar Voter Initiatives*. Accessed April 2025. https://soarvc.org/communities/initiatives/.

3 City of Oxnard. *2030 General Plan*.

Policy ER-12.5 ***Soil Conservation and Transfer***

Encourage the conservation of agricultural soils by requiring, if feasible and warranted by expert opinion, the transfer of topsoil from agricultural land being developed for urban uses.

Policy ER-12.8 ***Greenbelt Policies***

Continue the commitment of maintaining the Oxnard-Camarillo and Oxnard-Ventura Greenbelts and their associated policies.

Policy ER-12.9 ***Support Williamson Land Conservation Act Contracts***

Encourage the use of Williamson Land Conservation Act contracts and other related agreements and, if necessary, establish the City as an agency authorized to manage Williamson Act contracts.

4.2.3 Significance Thresholds

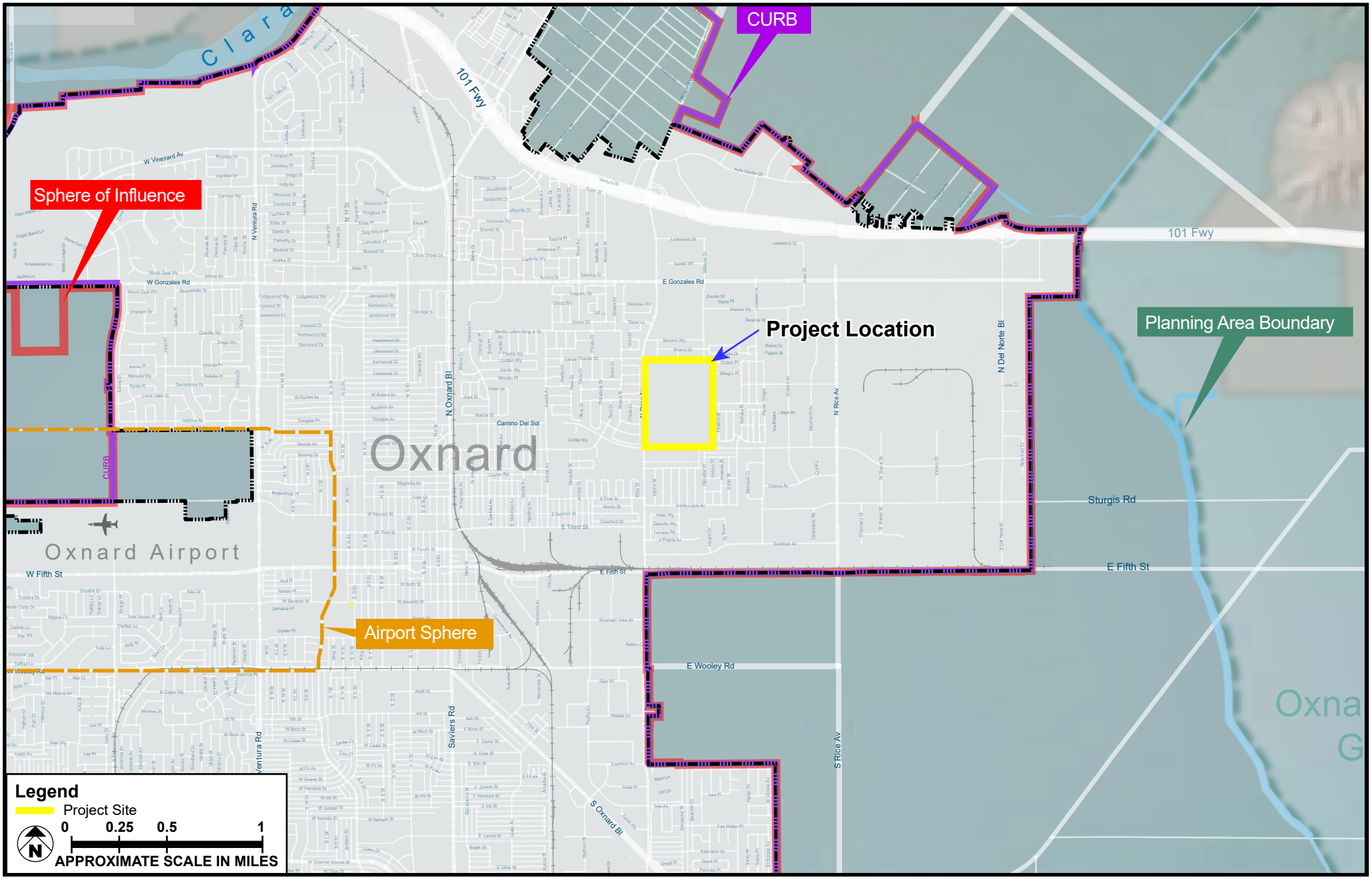
a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?

4.2.4 Methodology

Agricultural impacts are evaluated based upon the designation of important farmland on the Project Site, previous analysis of agricultural impacts related to the development of the Project Site, and a Land Evaluation and Site Assessment (LESA) analysis. For purposes of this analysis, important farmlands include the following classifications as defined by the DOC Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance.

The LESA model is a numeric rating system developed by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) and adapted for use in California by the DOC to evaluate the relative value of agricultural land when considering its potential conversion to non-agricultural uses. The LESA system consists of two major components: (1) the Land Evaluation (LE) score, which evaluates the inherent soil quality and long-term agricultural productivity of the land based on NRCS soil data; and (2) the Site Assessment (SA) score, which evaluates site-specific factors such as surrounding land use compatibility, proximity to urban development, availability of infrastructure and water supply, consistency with local land use policies, and the likelihood that the land will remain in long-term agricultural use.

LE scores typically account for up to 50% of the total LESA score and are based on soil characteristics including soil depth, texture, drainage, permeability, slope, and water-holding capacity. SA scores account for the remaining portion of the LESA score and incorporate local land use context, zoning,



SOURCE: CIty of Oxnard – 2024

FIGURE **4.2-3**

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Jurisdictional Boundaries

408-001-24

urban proximity, and agricultural viability considerations. The combined LE and SA scores generate a total LESA score ranging from 0 to 100.

LESA scores are used to determine whether a project would result in a potentially significant impact to agricultural resources and whether agricultural mitigation may be required. Lower LESA scores generally indicate reduced agricultural viability and lower potential for significant impacts related to farmland conversion.

4.2.5 Project Impacts

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?

Significant and Unavoidable Impact.

As shown in **Figure 4.2-1**, the Project Site contains Prime Farmland and Farmland of Statewide Importance. The proposed Sub-Neighborhood Plan would convert this land to non-agricultural use, which could cause potentially significant agricultural resource impacts. It should be noted that the development and conversion of the important farmland on the Project Site has been addressed in three prior certified EIRs over the last 20 years: the City General Plan EIR dating back to 2007 (SCH# 2007041024), the East Village Phase III Annexation EIR from 2011 (SCH# 2011031024) and the Del Sol High School EIR from 2019(SCH #2019029101).(SCH #2019029101).

City of Oxnard General Plan EIR

The Project Site is currently designated for urban development pursuant to the 2007 City General Plan EIR. The Project Site has the General Plan land use designations of Residential Low Medium (RLM), Commercial General (CG) and Park (PRK). The Project Site also has an Urban Village overlay. Per the General Plan, Urban Villages should be infill areas and/or areas developed with former agricultural land that provide private and public redevelopment, mixed land uses, affordable workforce housing, and transit connectivity. Additionally, the Project Site is located within the CURB for urban development and not adjacent to designated agricultural land or greenbelts.

Implementation of the General Plan, which includes the development of the Project Site, was estimated to result in the conversion of approximately 2,215 acres of important farmland from agricultural to urban uses. At the time the General Plan EIR was prepared, the approximately 107-acre Project Site was undeveloped and represented approximately 5 percent of this projected 2,215 acres. The City's General Plan includes policies to protect agricultural resources within the City's limits, such as providing buffers around agricultural land (Policies ER-1.2 and ER-12.8) and transferring topsoil from agricultural land being developed for urban uses (Policy ER-12.8). The General Plan EIR fully analyzed the impacts of converting the Project Site to non-agricultural use. These General Plan Program EIR policies would minimize the impact of converting agricultural land to urban uses; however, such conversion would still result in significant and unavoidable impacts, which were fully analyzed at the time of EIR certification. Based on this analysis, the City determined

that the benefits of the program outweighed the adverse impacts after considering all feasible mitigation measures and, therefore, adopted a Statement of Overriding Considerations.[4]

East Village Phase III Annexation EIR

The East Village Phase III Annexation Project EIR evaluated the potential environmental effects of annexing the Project Site and subsequent development consistent with the approved NECSP. The East Village Phase III Annexation Project identified that annexation of the Project Site would facilitate development that would result in the conversion of approximately 100 acres of active farmland, representing the final portion of the 655 acres of agricultural land previously evaluated under the City of Oxnard General Plan EIR identified for planned urban development in the NECSP. The impact of converting the farmland on the Project Site to urban uses was identified as a significant impact. The East Village Phase III Annexation EIR identified mitigation measure (**MM**) **AG-1**, which requires offering the top 12 inches of topsoil for removal to another location, if feasible, as a partial mitigation for the loss of the Prime Farmland on the Project Site. However, even with implementation of **MM AG-1,** the East Village Phase III EIR determined impacts to agricultural resources would remain significant and unavoidable.[5] Therefore, the City adopted a Statement of Overriding Considerations for the East Village Phase III Annexation Project EIR, finding that the Project's economic, housing, infrastructure, and long-term General Plan implementation benefits outweighed the significant and unavoidable conversion of agricultural land to urban uses (adopted May 7, 2013).[6]

Del Sol High School EIR

This EIR was prepared and certified by the Oxnard Union High School District (OUHSD) which served as the lead agency under CEQA for the environmental review of this project. Development of the Del Sol High School occurred in Area B of the Project Site in 2020. Although the site lies within the City's CURB and is designated for urban development, the EIR determined that construction of the school would result in the permanent conversion of designated farmland to urban uses. **MM AG-1**, requiring removal and reuse of topsoil where feasible, was incorporated; however, the impact to agricultural resources was found to remain significant and unavoidable because the project would reduce the amount of agricultural land for urban use.[7] The OUHSD Board determined that the benefits

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4 State of California, Office of Land Use and Innovation (LCI). "CEQANet." *City of Oxnard Draft Program EIR for the 2030 General Plan and 2006–2014 Housing Element*. 2011. Accessed April 2025. https://ceqanet.lci.ca.gov/2007041024/4.

5 City of Oxnard. *East Village Phase III Annexation Draft Environmental Impact Report*. 2012.

6 City of Oxnard. *East Village Phase III Annexation*. 2014 . Accessed April 2025. https://mwdh2o.granicus.com/MetaViewer.php?clip_id=3583&meta_id=84647&view_id=2&utm.

7 Tetra Tech. *New High School No. 8*. 2019.

outweighed the adverse impacts when considering all feasible mitigation measures. Therefore, the OUHSD Board adopted a Statement of Overriding Considerations in November 2019.[8]

Current Project — Maulhardt Stiles Sub-Neighborhood Plan

The central and southeastern portion of the Project Site, Area B, is developed with the existing Del Sol High School, and would not convert important farmland to urban uses. The proposed Project would convert the remaining 56.4 acres of important farmland located in Area A and C to urban uses, resulting in significant agricultural resource impacts. As such, the proposed Project would incorporate **MM AG-1**, which would offer the top 12 inches of soil from the portion of Area A and Area C mapped as Prime Farmland and Farmland of Statewide Importance for relocation and reuse to a local site (within Ventura County) that must be equivalent size (approximately 56.42 acres), and must be protected by a permanent conservation easement or deed restriction ensuring the land remains in agricultural use in perpetuity. Should this not be feasible, the Applicant shall pay an agricultural conversion in-lieu fee to the City of Oxnard to support agricultural resources preservation and agricultural viability within the region. Even with implementation of **MM AG-1**, impacts to agricultural resources would remain significant and unavoidable because the proposed Project would still convert agricultural land to urban uses; however, they would not be more severe than the impacts previously disclosed in the three EIRs that evaluated development of the Project Site, which each previously determined that the benefits outweighed the adverse impacts when considering all feasible mitigation measures. There is no new information which would serve to change those previous findings; therefore, the mitigation measure described in this section are in line with those deemed to mitigate such impacts to the maximum extent feasible in previous EIRs.

4.2.6 Cumulative Impacts

The proposed Project combined with other planned and pending projects would contribute to the conversion of agricultural land in the City's limits to non-agricultural uses. As discussed above, a number of regulatory mechanisms are in place to minimize the conversion of agricultural land to non-agricultural use in the City's limits including the County SOAR Ordinances, City CURB, and the greenbelt agreements between the Cities of Oxnard and Camarillo, and the City of Oxnard and County of Ventura. Nevertheless, planned development of Prime Farmland and Farmland of Statewide Importance within the City of Oxnard CURB, including the Project Site, would result in a significant cumulative impact on agricultural resources, as the conversion of such land to non-agricultural uses cannot be fully mitigated to a less than significant level. According to the City's 2030 General Plan Program EIR, cumulative development would result in the conversion of up to 2,215 acres of important farmland, of which 1,048 acres would be farmland of Statewide importance.

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8 Oxnard Union High School District. *Del Sol High School Environmental Impact Report*, including *CEQA Findings and Statement of Overriding Considerations*. Certified November 2019.

The General Plan EIR concluded that this significant cumulative impact was unavoidable as no feasible mitigation measures were available to reduce this impact to a less than significant level. The proposed Project would contribute to this significant cumulative impact by converting Areas A and C, which contain Important Farmland as designated by the FMMP to urban uses. As described above, based on the current conditions of the Project Site, the conversion of the 44.5 acres of land in Area A to urban uses is considered a significant impact and contributes to this cumulative impact.

4.2.7 Level of Significance Without Mitigation

Impacts would be significant without mitigation measures.

4.2.8 Mitigation Measures

Measures considered by the City to mitigate the impact of converting the agricultural land in Areas A and C to non-agricultural use included the mitigation measure previously adopted by the City at the time the Project Site was annexed to the City, and other measures adopted by the City to mitigate the conversion of agricultural land for other projects.

MM AG-1 adopted with approval of the East Village Phase III Annexation Project remains applicable to the Project Site. This measure requires that the top 12 inches of agricultural topsoil be made available for relocation and reuse on other agricultural lands, where feasible. This measure, previously adopted by the City in connection with annexation of the Project Site, represents an established and enforceable mitigation measure applicable to development of the Project Site. While the effectiveness of this measure is dependent on the availability of receiving sites, it remains a feasible form of mitigation that provides some degree of resource conservation by preserving soil productivity.

The City also considered the feasibility of agricultural conservation easements (ACEs) as a form of compensatory mitigation for this impact. ACEs preserve existing farmland elsewhere; however, they do not replace or recreate the farmland that is permanently converted by a project. Therefore, ACEs would not avoid or reduce the impact to below a level of significance but would instead serve only as partial compensatory mitigation.

Furthermore, the feasibility of obtaining ACEs is based on several factors. There is no established program or responsible entity within the City or region to acquire, monitor, and enforce agricultural conservation easements, and there is no evidence that property owners of agricultural land in the area are willing participants in such a program. In addition, the City has previously acknowledged administrative and logistical constraints associated with acquiring ACEs. As such, there is insufficient evidence to conclude that pursuing agricultural conservation easements would be successfully implemented or would meaningfully reduce impacts beyond existing mitigation measure adopted by the City applicable to this Project Site. Therefore, while ACEs are recognized as a potential mitigation strategy, they are not considered feasible or more effective than the mitigation measure previously adopted by the City for the Project Site.

In-lieu fees represent another form of compensatory mitigation that can be used to offset the loss of Important Farmland. Like ACEs, in-lieu fees would not reduce impacts to a less than significant level because they do not prevent the physical conversion of farmland. However, in-lieu fees may be appropriate to reduce impacts to the maximum extent feasible by providing a mechanism for supporting the long-term viability of agricultural resources within the region. The City has adopted mitigation requiring payment of an in-lieu fee to ensure that, even if direct soil reuse is not achievable, the Project would still contribute to regional agricultural sustainability efforts. For this Project, in-lieu fees are considered an appropriate secondary mitigation option if implementation of the topsoil salvage measure is not feasible (e.g., where no receiving site is available or no entity elects to accept the soil).

Mitigation measure **MM AG-1** below incorporates and modifies the mitigation measure previously adopted by the City with approval of the East Village Phase III Annexation Project and annexation of this site to the City by requiring a permanent conservation easement or deed restriction to ensure any land that receives topsoil from the Project remains in agricultural use in perpetuity to ensure the impact of converting agricultural land in the Project to non-agricultural use is mitigated to the greatest extent feasible.

MM AG-1 Prior to issuance of the first grading permit, the Applicant shall make available the top 12 inches of agricultural soil (topsoil) from Areas A and C of the Project for relocation and reuse on agricultural lands with lower quality soils, defined as lands not classified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland under the Department of Conservation Farmland Mapping and Program. The receiving site must be local (within Ventura County), must be of equivalent size (approximately 56.42 acres), and must be protected by a permanent conservation easement or deed restriction ensuring the land remains in agricultural use in perpetuity. The language of the conservation easement or deed restriction shall be subject to approval of the City of Oxnard.

The Applicant shall coordinate with local farmers, agricultural operators, or other appropriate entities to identify receiving sites. If a receiving site is identified, the party accepting the soil shall be responsible for the removal, transport, and placement of the soil at the receiving site, subject to approval by the City. Documentation demonstrating a good faith effort to identify a receiving site, including outreach to local agricultural operators, shall be provided to the City prior to the issuance of the first grading permit.

If the Applicant demonstrates to the satisfaction of the City that relocation and reuse to the topsoil from Area A and Area C is not feasible (e.g., no receiving site is available, no entity elects to accept the soil, or the deed restriction or conservation easement, the Applicant shall pay an agricultural conversion in-lieu fee of $1,351,671.43 to the

City of Oxnard (based on $23,957.31 per acre for the 56.42 acres in Areas A and C prior to issuance of the first grading permit.

The in-lieu fees collected shall be used at the discretion of the City to support agricultural resource preservation and agricultural viability within the region, including but not limited to land acquisition, agricultural infrastructure improvements, and the development, refurbishment, or construction of farmworker housing within the City of Oxnard.

4.2.9 Level of Significance After Mitigation

MM-AG-1, which incorporates and modifies the mitigation measure previously adopted by the City with approval of the East Village Phase III Annexation Project and includes additional mitigation, remains consistent with the City's prior determinations that the impact of converting the agricultural land within the Project Site to non-agricultural use cannot be reduced to less than significant.

With implementation of mitigation measure **MM AG-1**, impacts to agricultural resources will be mitigated to the fullest extent feasible, consistent with the conclusions in the three prior EIRs that evaluated the impact of converting the agricultural land within the Project Site to non-agricultural uses. The impact of the proposed Sub-Neighborhood Plan Project would not be more severe than previously disclosed in the City's General Plan EIR, the East Village Phase III Annexation EIR, and the Del Sol High School EIR, each of which identified similar impacts.

While implementation of **MM AG-1** would mitigate the impact of converting the 56.42 acres of agricultural land within the Project Site to urban uses to the fullest extent feasible, this measure would not reduce this impact to less than significant. For this reason, the impact of converting the 56.42 acres of agricultural land in the Project Site would remain significant.

4.3 AIR QUALITY

This section of the EIR evaluates the potential air quality impacts of the proposed Project, including whether impacts associated with the Project may potentially affect regional and local air quality. Various federal, State, regional, and local programs and regulations related to anticipated air quality impacts are discussed in this section. Emission calculations and air quality modeling completed for the Project are contained in **Appendix E: Air Quality, Greenhouse Gas, and Energy Study** of this EIR. As discussed in the Initial Study (**Appendix A**), impacts associated with Threshold d: odor, were determined to be less than significant. Therefore, further detailed evaluation of potential impacts related to this topic is not provided for this reason.

4.3.1 Background

The Project is located within the South Central Coast Air Basin (Air Basin). The Air Basin includes all of Ventura, Santa Barbara, and San Luis Obispo Counties. The Air Basin wide Air Pollution Control Council is made up of three air pollution control districts. The Ventura County Air Pollution Control District (VCAPCD) shares responsibility with the California Air Resources Board (CARB) for ensuring that state and federal air quality standards are achieved and maintained within Ventura County (County).

Air pollutant emissions within the Air Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point sources and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products, such as barbeque lighter fluid and hair spray. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircrafts, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

The U.S. Environmental Protection Agency (USEPA) and the CARB designate air basins where air pollution levels exceed the California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) as "nonattainment" areas. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them. The federal and State standards have been set at levels considered safe to protect public health, including the health of "sensitive" populations, such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. If standards are met, the area is designated as

an "attainment" area. If there is inadequate or inconclusive data to make a definitive attainment designation, an area is considered "unclassified." Federal nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Transportation conformity for nonattainment and maintenance areas is required under the federal Clean Air Act (CAA) to ensure federally supported highway and transit projects conform to the State Implementation Plan (SIP). The USEPA approved California's SIP revisions for attainment of the 1997 8-hour ozone (O_3) National AAQS for the Air Basin in October 2019.

Ambient air pollution can cause public health concerns and can contribute to increases in respiratory illness and death rates. Air pollution can affect the health of both adults and children. The adverse health effects associated with air pollution are diverse and include cardiovascular effects, premature mortality, respiratory effects, cancer, reproductive effects, neurological effects, and other health outcomes.[1]

Criteria Air Pollutants and Health Effects

Criteria air pollutants are defined as the six principal pollutants for which NAAQS and CAAQS criteria and standards have been promulgated. These criteria air pollutants are most relevant to current air quality planning and regulation in the Air Basin are: 1) ozone (O_3) carbon monoxide (CO); 2) nitrogen dioxide (NO_2); 3) respirable particulate matter (PM_{10}); 4) fine particulate matter ($PM_{2.5}$); 5)sulfur dioxide (SO_2); and 6) lead (Pb). In addition, volatile organic compounds (VOC) and toxics air contaminants (TACs) are a concern in the Air Basin but are not classified under AAQS.

The State and federal AAQS and their attainment status in the Air Basin for each of the criteria pollutants are summarized below in **Table 4.3-1: Ambient Air Quality Standards and Attainment Status.** The Air Basin is currently designated as being in nonattainment at the federal level for O_3 and at the State level for O_3, and PM_{10}.

TABLE 4.3-1: AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS

		California		Federal	
Pollutant	**Averaging Period**	**Standards**	**Attainment Status**	**Standards**	**Attainment Status**
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Nonattainment	—	Nonattainment
	8-hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)	
Nitrogen Dioxide (NO_2)	Annual Arithmetic mean	0.03 ppm (57 µg/m^3)	Attainment	0.053 ppm (100 µg/m^3)	Unclassified/ Attainment
	1-hour	0.18 ppm (339 µg/m^3)		0.100 ppm (188 µg/m^3)	

1 Ventura County Air Pollution Control District (VCAPCD). *2022 Air Quality Management Plan*. http://www.vcapcd.org/pubs/Planning/AQMP/2022/Final-2022-AQMP-without-appendices.pdf. Accessed August 2024.

TABLE 4.3-1: AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Unclassified/ Attainment
	1 hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)	
Sulfur Dioxide (SO_2)	1 hour	0.25 ppm	Attainment	0.075 ppm	Attainment
	24 hours	0.04 ppm		—	
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	—	Attainment
	Rolling 3-month average	—		0.15 µg/m^3	
Respirable Particulate Matter (PM_{10})	24 hours	50 µg/m^3	Nonattainment	150 µg/m^3	Unclassified
	Annual arithmetic mean	20 µg/m^3		—	
Fine Particulate Matter ($PM_{2.5}$)	24 hours	—	Attainment	35 µg/m^3	Unclassified/ Attainment
	Annual arithmetic mean	12 µg/m^3		9 µg/m^3	

Source: California Air Resources Board (CARB), Area Designations Maps/State and National, http://www.arb.ca.gov/desig/adm/adm.htm. Accessed August 2024.

Note: ppm = parts per million; µg = micrometer; m3 = cubic meter; mg = milligram.

Elevated concentrations of certain air pollutants in the atmosphere are recognized as causes of notable health problems and consequential damage to the environment either directly or in reaction with other pollutants. In the United States, such pollutants are identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the USEPA and are subject to emissions control requirements adopted by federal, State, and local regulatory agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted pertaining to them.

The EPA established the NAAQS to "provide public health protection, including protecting the health of 'sensitive' populations such as asthmatics, children, and the elderly," allowing "an adequate margin of safety." CAAQS were "established to protect the health of the most sensitive groups in our communities" and "defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment."[2] The characteristics of each criteria pollutant and their health effects are briefly described below.

2 California Air Resources Board (CARB). "California Ambient Air Quality Standards." https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards. Accessed August 2024.

Ozone (O_3)

O_3 is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs), sometimes referred to as VOCs, and NO_X, byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

According to USEPA, O_3 can cause the muscles in the airways to constrict, potentially leading to wheezing and shortness of breath. O_3 can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease.[3]

Long-term exposure to O_3 is linked to aggravation of asthma and is likely to be one of many causes of asthma development. Long-term exposures to higher concentrations of O_3 may also be linked to permanent lung damage, such as abnormal lung development in children. According to CARB, inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing, and worsening a variety of symptoms, and exposure to O_3 can reduce the volume of air that the lungs breathe in and cause shortness of breath.[4]

USEPA states that people most at risk from breathing air containing O_3 include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers. Children are at greatest risk from exposure to O_3 because their lungs are still developing and they are more likely to be active outdoors when O_3 levels are high, which increases their exposure. According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to O_3 and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults.[5] Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults.

The VCAPCD has established thresholds for VOCs and Nitrogen Oxides (NO_x) as they are precursors to ozone formation.

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3 US Environmental Protection Agency (USEPA). "Health Effects of Ozone Pollution." https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution. Accessed August 2024.

4 USEPA. "Health Effects of Ozone Pollution."

5 USEPA. "Health Effects of Ozone Pollution."

Carbon Monoxide (CO)

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain and at very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death.[6] Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina.

According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.[7] For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO.

Nitrogen Dioxide (NO_2)

NO_2 is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO), similar to O_3. NO_2 is also a byproduct of fuel combustion. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10}. High concentrations of NO_2 can cause breathing difficulties and there is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.

According to the USEPA, short-term exposures to NO_2 can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty

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6 USEPA. "Carbon Monoxide (CO) Pollution in Outdoor Air." https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution. Accessed August 2024.

7 CARB. "Carbon Monoxide & Health." https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health. Accessed August 2024.

breathing), hospital admissions and visits to emergency rooms.[8] Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections.[9] According to CARB, controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics.[10]

In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.[11] Infants and children are particularly at risk from exposure to NO_2 because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration while in adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease.

CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO_2 and there is only limited information for NO and NO_X, as well as large uncertainty in relating health effects to NO or NO_X exposure.[12]

Particulate Matter (PM_{10}) and Fine Particulate Matter ($PM_{2.5}$)

Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Sources of PM_{10} emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands.[13] Sources of $PM_{2.5}$ emissions include combustion of gasoline, oil, diesel fuel, or wood. PM_{10} and $PM_{2.5}$ may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO_2, NO_X, and certain organic compounds.[14]

A consistent correlation between elevated ambient respirable and fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma

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8 USEPA. “Basic information about NO2.” https://www.epa.gov/no2-pollution/basic-information-about-no2. Accessed September 2025.

9 USEPA. “Basic information about NO2.”

10 CARB. “Nitrogen Dioxide & Health.” https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health. Accessed August 2024.

11 CARB. “Nitrogen Dioxide & Health.”

12 CARB. “Nitrogen Dioxide & Health.”

13 CARB. “Inhalable Particulate Matter and Health (PM2.5 and PM10).” https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm. Accessed August 2024.

14 CARB. “Inhalable Particulate Matter and Health (PM2.5 and PM10).”

attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world.[15] In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life span, and an increased mortality from lung cancer.[16]

According to CARB, both PM_{10} and $PM_{2.5}$ can be inhaled, with some depositing throughout the airways; PM_{10} is more likely to deposit on the surfaces of the larger airways of the upper region of the lung, while $PM_{2.5}$ is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation.[17] Short-term (up to 24 hours duration) exposure to PM_{10} has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits. The effects of long-term (months or years) exposure to PM_{10} are less clear, although studies suggest a link between long-term PM_{10} exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.[18]

Short-term exposure to $PM_{2.5}$ has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. Long-term exposure to $PM_{2.5}$ has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. According to CARB, populations most likely to experience adverse health effects with exposure to PM_{10} and $PM_{2.5}$ include older adults with chronic heart or lung disease, children, and asthmatics. Children and infants are more susceptible to harm from inhaling pollutants such as PM_{10} and $PM_{2.5}$ compared to healthy adults because they inhale more air per pound of body weight than adults, spend more time outdoors, and have developing immune systems.[19]

As the Air Basin is in nonattainment for PM_{10}, the VCAPCD recommends methods for reducing fugitive dust emissions in VCAPCD Rule 55 and Rule 55.2.

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15 *See* Cong Liu et al., *Ambient Particulate Air Pollution and Daily Mortality in 652 Cities*. 381 N. Engl. J. Med. 705–15 (2019). https://doi.org/10.1056/NEJMoa1817364; *see also* U.S. Environmental Protection Agency. *Integrated Science Assessment (ISA) for Particulate Matter (Final Report, 2019)*. EPA/600/R-19/188 (Dec. 2019). https://www.epa.gov/isa/integrated-science-assessment-isa-particulate-matte. Accessed September 2025.

16 Douglas W. Dockery et al., *An Association Between Air Pollution and Mortality in Six U.S. Cities*. 329 *N. Engl. J. Med.* 1753–59 (1993). https://doi.org/10.1056/NEJM199312093292401. Accessed September 2025.

17 CARB. "Inhalable Particulate Matter and Health (PM2.5 and PM10)."

18 International Agency for Research on Cancer. *Outdoor Air Pollution*. vol. 109, Section 6.1–6.3, at 443–44 (2015). https://publications.iarc.who.int/_publications/media/download/6728/2a4781ab99e984d14088fa21d09c3524dc26f6ee.pdf. Accessed September 2025.

19 CARB. "Inhalable Particulate Matter and Health (PM2.5 and PM10)."

Sulfur Dioxide (SO_2)

SO_2 is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, as well as from chemical processes occurring at chemical plants and refineries.[20] When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

According to the USEPA, short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult.[21] According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO_2 (above 1 parts per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality. Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO_2.[22]

Lead (Pb)

Pb occurs in the atmosphere as particulate matter and is also considered a TAC. Historically, a major source of lead in the air was leaded gasoline exhaust.[23] The use of leaded gasoline is no longer permitted for on-road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles.[24] However, because leaded gasoline was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, Pb is present in many urban soils and can be resuspended in the air.[25] Other sources of Pb include paint, ceramics, pipes and plumbing materials, solders, gasoline, batteries, ammunition and cosmetics. [26]

Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system, and affects the oxygen carrying capacity of blood. The Pb effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage. Excessive Pb exposure in adults can cause reproductive problems in men and women, high

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20 USEPA. “Sulfur Dioxide (SO2) Pollution.” https://www.epa.gov/so2-pollution/sulfur-dioxide-basics. Accessed August 2024.

21 USEPA. “Sulfur Dioxide (SO2) Pollution.”

22 CARB. “Sulfur Dioxide & Health.” https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health. Accessed August 2024; *see also* USEPA. Sulfur Dioxide (SO2) Pollution. https://www.epa.gov/so2-pollution/sulfur-dioxide-basics. Accessed August 2024.

23 CARB. “Lead & Health.” https://ww2.arb.ca.gov/resources/lead-and-health. Accessed October 2025.

24 USEPA. *EPA Takes Final Step in Phaseout of Leaded Gasoline*. https://www.epa.gov/archive/epa/aboutepa/epa-takes-final-step-phaseout-leaded-gasoline.html. Accessed October 2025.

25 CARB. “Lead & Health.”

26 USEPA. “Learn about Lead.” https://www.epa.gov/lead/learn-about-lead#found. Accessed October 2025.

blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.[27]

The VCAPCD does not specify numerical indicators of significance for Pb. Project construction and operation would not include sources of Pb emissions. Unleaded fuel and unleaded paints have significantly reduced Pb emissions.[28,29]

Volatile Organic Compounds (VOCs)

VOCs include any compound of carbon, excluding CO, CO_2, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and thus, a precursor of ozone formation. VOC emissions often result from the evaporation of solvents in architectural coatings. Reactive organic gases are any reactive compounds of carbon, excluding methane, CO, CO_2 carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds. ROG emissions are generated from the exhaust of mobile sources.[30] Both VOCs and ROGs are precursors to ozone, and the terms can be used interchangeably.[31]

Toxic Air Contaminants (TACs)

TACs or hazardous air pollutants (HAPs) are defined by the USEPA as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard.[32] For consistency within this document, TACs and HAPS will be referred to as TACs. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects.[33] TACs are emitted by a variety of industrial processes such as petroleum refining, electric utility and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. TACs may exist as PM_{10} and $PM_{2.5}$ or as vapors (gases).[34] TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources.[35] The emission of a TAC does not automatically create a health hazard; other factors, such as the amount of the TAC, its toxicity, how it is released into the air, the

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27 CARB. "Lead & Health."

28 CARB. "Lead & Health."

29 USEPA. "Lead Regulations." https://www.epa.gov/lead/lead-regulations. Accessed October 2025.

30 VCAPCD. *2022 Air Quality Management Plan*.

31 Both VOC and ROGs are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.

32 USEPA. *What are Hazardous Air Pollutants*? (last updated Nov. 21, 2024). https://www.epa.gov/haps/what-are-hazardous-air-pollutants. Accessed September 2025.

33 CARB. "Health & Air Pollution." https://ww2.arb.ca.gov/resources/health-air-pollution. Accessed September 2025.

34 USEPA. "Hazardous Air Pollutants: Sources and Exposure." https://www.epa.gov/haps/hazardous-air-pollutants-sources-and-exposure. Accessed October 2025.

35 USEPA. *What are Hazardous Air Pollutants?*

weather, and the terrain, all influence whether the emission could be hazardous to human health.[36] Emissions of TACs into the air can be damaging to human health and to the environment. Human exposure to TACs at sufficient concentrations and durations can result in damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems. TACs deposited onto soil or into lakes and streams affect ecological systems and eventually human health through consumption of contaminated food.[37] The carcinogenic potential of TACs is a particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.[38]

The public's exposure to TACs is a significant public health issue in California. The Air Toxics "Hotspots" Information and Assessment Act[39] is a State law requiring facilities to report emissions of TACs to air districts.[40] The program is designated to quantify the amounts of potential TACs released, the location of the release, the concentrations to which the public is exposed, and the resulting health risks. The Air Toxics "Hotspots" Program (AB 2588) identified over 200 TACs, including the 188 TACs identified in the CAA.[41]

The USEPA has assessed this expansive list and identified 21 TACs as Mobile Source Air Toxics (MSATs).[42] MSATs are compounds emitted from highway vehicles and non-road equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxins are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. USEPA also extracted a subset of these 21 MSAT compounds that it now labels as the nine priority MSATs: 1,3-butaidene, acetaldehyde, acrolein, benzene, diesel particulate matter (DPM)/diesel exhaust organic gases, ethylbenzene, naphthalene, and polycyclic organic matter

36 USPEA. *Evaluating Exposures to Toxic Air Pollutants*. https://www.epa.gov/sites/default/files/2020-08/documents/evaluatingexposurestotoxicacitizensguide.pdf. Accessed October 2025.

37 USEPA. "Health and Environmental Effects of Hazardous Air Pollutants."

38 USEPA. "Hazardous Air Pollutants." https://www.epa.gov/haps. Accessed August 2024.

39 California Health & Safety Code Section 44300–44394.

40 CARB. "General Information About Hot Spots." https://www.arb.ca.gov/ab2588/general.htm. Accessed August 2024.

41 CARB. "AB 25188 Air Toxics Hot Spots Program." https://www.arb.ca.gov/ab2588/ab2588.htm. Accessed August 2024.

42 EPA. *Air Toxics Risk Assessment Reference Library. Volume 1 Technical Resource Manual*. https://www.epa.gov/fera/air-toxics-risk-assessment-reference-library-volumes-1-3. Accessed August 2024.

(POM). While these nine MSATs are considered the priority transportation toxics, USEPA stresses that the lists are subject to change and may be adjusted in future rules.[43]

Diesel Exhaust

According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from the exhaust of diesel-fueled engines (i.e., DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances).[44]

Diesel exhaust is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of many of the urban TACs, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons.[45] The particle phase is also composed of many different types of particles by size or composition. Fine and ultra-fine diesel particulates are of the greatest health concern and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements.[46] Diesel exhaust is emitted from a broad range of diesel engines; the on-road diesel engines of trucks, buses and cars and the off-road diesel engines that include locomotives, marine vessels, and heavy-duty equipment. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.[47]

Most major sources of diesel emissions, such as ships, trains, and trucks operate in and around ports, rail yards, and heavily traveled roadways. These areas are often located near highly populated areas. Because of this, elevated DPM levels are mainly an urban problem, with large numbers of people exposed to higher DPM concentrations, resulting in greater health consequences compared to rural areas. The fine and ultra-fine particles are respirable (similar to $PM_{2.5}$), which means that they can avoid many of the human respiratory system defense mechanisms and enter deeply into the

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43 US Department of Transportation Federal Highway Administration. *Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents*. https://www.fhwa.dot.gov/Environment/air_quality/air_toxics/policy_and_guidance/aqintguidmem.cfm#fig1. Accessed August 2024.

44 CARB. *California Almanac of Emissions & Air Quality*—2013 Edition, ch. 2, at 2-5 to 2-6 (2014). https://ww2.arb.ca.gov/sites/default/files/2021-01/chap213.pdf; *see also* Cal. Air Res. Bd., Attachment A: Public Health and Environmental Benefits of Draft Scoping Plan Measures A-10 (2008). https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/document/ph_statewide_a.pdf. Accessed September 2025.

45 CARB. "Overview: Diesel Exhaust & Health." https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health. Accessed October 2025.

46 Wichmann HE. "Diesel exhaust particles." *Inhal Toxicol. 2007;19 Suppl 1:241-4.* https://pubmed.ncbi.nlm.nih.gov/17886072/. *Accessed October 2025.*

47 CARB. *Diesel Fuel Aromatic Content and Exhaust Emissions of Polycyclic Aromatic Hydrocarbons*. https://ww2.arb.ca.gov/sites/default/files/barcu/regact/ulsd2003/appc.pdf. Accessed October 2025.

lungs.[48] Exposure to DPM comes from both on-road and off-road engine exhaust that is either directly emitted from the engines or lingering in the atmosphere.

Diesel exhaust causes health effects from long-term chronic exposures. The type and severity of health effects depends upon several factors including the amount of chemical exposure and the duration of exposure.[49] Individuals also react differently to different levels of exposure. There is limited information on exposure to only DPM, but there is enough evidence to indicate that inhalation exposure to diesel exhaust causes chronic health effects as well as having cancer-causing potential.[50]

Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to noncancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.[51]

Gasoline Exhaust

Similar to diesel exhaust, gasoline is composed of two phases, gas and particle, and both phases contribute to the health risk.[52] The gas phase is composed of the same TACs, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. Gasoline exhaust sources include gasoline-powered cars and trucks, recreational boats and other pleasure craft, generators, landscaping equipment (including lawnmowers, hedge trimmers, leaf blowers, and chainsaws), and other machinery. The compounds in the gas and particles phases can cause health effects from short- and long-term exposures including cancer and/or birth defects or other reproductive harm.[53]

Visibility Reducing Particles

Visibility-reducing particles are any particles in the atmosphere that obstruct the range of visibility by creating haze. These particles vary in shape, size, and chemical composition, and come from a variety of natural and manmade sources including windblown metals, soil, dust, salt, and soot. Other

48 CARB. “Overview: Diesel Exhaust & Health.”

49 U.S. Department of Health and Human Services. *Evaluation of Diesel Exhaust Exposures at Multiple Fire Stations in a City Fire Department*. https://www.cdc.gov/niosh/hhe/reports/pdfs/2015-0159-3265.pdf. Accessed October 2025.

50 CARB. “Overview: Diesel Exhaust & Health.”

51 CARB. “Overview: Diesel Exhaust & Health.”

52 California State Portal. “Gasoline Engine Exhaust.” https://www.p65warnings.ca.gov/fact-sheets/gasoline-engine-exhaust. Accessed October 2025.

53 California State Portal. “Gasoline Engine Exhaust.”

haze-causing particles are formed in the air from gaseous pollutant (e.g., sulfates, nitrates, organic carbon particles) which are the major constituents of fine PM, such as $PM_{2.5}$ and PM_{10}, and are caused from the combustion of fuel. CARB's standard for visibility reducing particles is not based on health effects, but rather on welfare effects, such as reduced visibility and damage to materials, plants, forests, and ecosystems.[54] The health impacts associated with $PM_{2.5}$ and PM_{10} are discussed above under Particulate Matter.

4.3.2 Existing Conditions

Regional Meteorology

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Air Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential.[55]

The climate within Ventura County is characterized by hot summers, mild winters, infrequent seasonal rainfall, and the Santa Ana winds bringing warm conditions and moderate humidity to the area.[56] The air above Ventura County often exhibits weak vertical and horizontal dispersion characteristics, which limit the dispersion of emissions and cause increased ambient air pollutant levels. Persistent temperature inversions prevent vertical dispersion.[57] The inversions act as a "ceiling" that prevents pollutants from rising and dispersing. Mountain ranges act as "walls" that inhibit horizontal dispersion of air pollutants. The diurnal land/sea breeze pattern common in Ventura County recirculates air contaminants. Air pollutants are pushed toward the ocean during the early morning by the land breeze, and toward the east during the afternoon, by the sea breeze. This creates a "sloshing" effect, causing pollutants to remain in the area for several days.[58] Residual emissions from previous days accumulate and chemically react with new emissions in the presence of sunlight,

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54 CARB. "Visibility-Reducing Particles & Health." https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health#:~:text=The%20Ambient%20Air%20Quality%20Standard%20for%20visibility%2Dreducing%20particles%20is,Haze%20also%20has%20economic%20consequences. Accessed October 2025.

55 WRCC. "Climate of California." https://wrcc.dri.edu/Climate/narrative_ca.php#:~:text=California%20lies%20within%20the%20zone,during%20most%20of%20the%20year. Accessed August 2024.

56 County of Ventura Public Works. "Weather Information." https://floodinfo.venturacounty.gov/weather-information/. Accessed October 2025.

57 Ventura County. *2040 General Plan: Natural Resources.* https://rma.venturacounty.gov/wp-content/uploads/2024/10/general-plan-chapter-8-natural-resources.pdf. Accessed October 2025.

58 VCAPCD. "Local Air Quality Trends." https://www.vcapcd.org/local-air-quality-trends. Accessed October 2025.

thereby increasing ambient air pollutant levels. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California.[59] However, as discussed earlier, the Air Basin fails to meet the national standards for O_3 as well as the State standards for O_3 and $PM_{2.5}$.[60]

California Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table 4.3-2: South Central Coast Air Basin Attainment Status (Ventura County)** provides a summary of the attainment status of the Ventura County portion of the Air Basin with respect to the federal and State standards.

TABLE 4.3-2: SOUTH CENTRAL COAST AIR BASIN ATTAINMENT STATUS (VENTURA COUNTY)

Pollutant	State Status	National Status
Ozone (O_3)	**Nonattainment**	**Nonattainment**
Carbon monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen dioxide (NO_2)	Attainment	Unclassified/Attainment
Sulfur dioxide (SO_2)	Attainment	Unclassified/Attainment
Respirable particulate matter (PM_{10})	**Nonattainment**	Unclassified
Fine particulate matter ($PM_{2.5}$)	Attainment	Unclassified/Attainment

Source: California Air Resources Board (CARB) Area Designation Maps / State and National, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed August 2024.

Existing Ambient Air Quality

The VCAPCD maintains a network of air quality monitoring stations throughout Ventura County. The nearest air monitoring station VCAPCD operates to the Project Site is located at El Rio-Rio Mesa School #2 at 545 Central Avenue, approximately 2.8 miles north of the Project Site. This station monitors O_3, NO_2, PM_{10} and $PM_{2.5}$. **Table 4.3-3: Air Quality Monitoring Summary** summarizes published monitoring data from 2022 through 2024, the most recent 3-year period available. The data shows that during the past few years, the region has exceeded the PM_{10} and $PM_{2.5}$ standards.

TABLE 4.3-3: AIR QUALITY MONITORING SUMMARY

Air Pollutant	Average Time (Units)	2022	2023	2024
Ozone (O_3)	State Max 1 hour (ppm)	0.077	0.071	0.073
	Days > CAAQS threshold (0.09 ppm)	0	0	0
	National Max 8 hour (ppm)	0.063	0.058	0.060
	Days > NAAQS threshold (0.075 ppm)	0	0	0
	State Max 8 hour (ppm)	0.063	0.059	0.060

59 VCAPCD. *2022 Air Quality Management Plan*.

60 CARB. "Maps of State and Federal Area Designations." https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed August 2024.

TABLE 4.3-3: AIR QUALITY MONITORING SUMMARY				
Air Pollutant	**Average Time (Units)**	**2022**	**2023**	**2024**
	Days > CAAQS threshold (0.07 ppm)	0	0	0
Nitrogen dioxide (NO_2)	National Max 1 hour (ppm)	0.032	0.027	0.029
	Days > NAAQS threshold (0.100 ppm)	0	0	0
	State Max 1 hour (ppm)	0.032	0.027	0.029
	Days > CAAQS threshold (0.18 ppm)	0	0	0
Respirable particulate matter (PM_{10})	National Max (µg/m3)	57.9	102.8	272.9
	National Annual Average (µg/m3)	22.7	20.3	19.6
	Days > NAAQS threshold (150 µg/m3)	0	0	1
	State Max (µg/m3)	57.5	104.0	90.8
	State Annual Average (µg/m3)	23.1	20.4	19.3
	Days > CAAQS threshold (50 µg/m3)	3	7	3
Fine particulate matter ($PM_{2.5}$)	National Max (µg/m3)	18.5	24.5	90.5
	National Annual Average (µg/m3)	6.4	6.1	5.1
	Days > NAAQS threshold (35 µg/m3)	0	0	2
	State Max (µg/m3)	18.5	24.5	47.8
	State Annual Average (µg/m3)	6.5	—	4.9

Source: CARB, iADAM: Air Quality Data Statistics.
Note: (—) = Data not available.

Existing Emissions

The Project Site contains vacant, undeveloped land that has been subject to previous disturbance, including historic agricultural activities, an existing home, additional residential units, and accessory buildings associated with the past agricultural use, and an existing high school. The buildings on the site are currently vacant except for Del Sol High School. Del Sol High School is currently operating at half capacity with only freshman and sophomores enrolled. In 2026, the school is anticipated to enroll all high school grade levels at a full capacity of up to 2,500 students.[61] The half capacity of the school (1,250 students) is used to conservatively estimate existing vehicle trips and air quality emissions from operations related to these existing uses. The existing emissions were estimated using the most recent version of the California Emissions Estimator Model (CalEEMod version 2022.1.1.30). **Table 4.3-4: Existing Operational Air Quality Emissions** identifies the emissions from the existing high school uses and single-family homes.

61 Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*. https://files.ceqanet.opr.ca.gov/64030-2/attachment/Hgni8w7hLuA--vUekhSzn9XYr0Sm3HeBZzNz0glEgLi2hyCNwU3RKEqpKLaz0TSjMy-QTA2bLkKSYlvb0. Accessed March 2025.

TABLE 4.3-4: EXISTING OPERATIONAL AIR QUALITY EMISSIONS						
Source	VOC	NO_x	CO	So_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Mobile	10.7	7.8	61.5	0.1	12.1	3.1
Area	5.0	0.0	7.2	<0.1	<0.1	<0.1
Energy	0.1	1.0	0.8	<0.1	0.1	0.1
Total	15.8	8.8	69.6	0.1	12.2	3.2
VCAPCD Mass Daily Threshold	25	25	—	—	—	—
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; Sox = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix *E*.**

Sensitive Receptors

VCAPCD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Locations evaluated for exposure to air pollution include but are not limited to residences, schools, hospitals, and convalescent facilities.[62]

Uses surrounding the Project Site include single-family residential to the north and west; single-family residential and a park to the east; and single-family and multi-family residential and commercial uses to the south. As mentioned previously, the Project Site is bounded to the north by Cesar Chavez Drive, to the east by Gibraltar Street/East Village Park, to the south by Camino Del Sol, and to the west by Rose Avenue. The nearest sensitive receptors to the Project Site include:

- Single-family residential uses across Cesar Chavez Drive to the north
- Single-family residential uses along Ocaso Place Drive to the east
- Single-family residential uses along Kohala Street to the east
- School-uses located Cesar Chavez Drive to the east
- Single- and multi-family residential uses across Camino Del Sol to the South
- Senior living facilities across Camino Del Sol to the south
- Single family residential uses across North Rose Avenue

62 South Coast Air Quality Management District (SCAQMD). *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (adopted May 6, 2005). https://www.southcoastaqmd.gov/home/research/guidelines/planning-guidance/guidance-document. Accessed September 2025.

4.3.3 Regulatory Framework

Federal

Clean Air Act (CAA)

The CAA[63] is the comprehensive federal law that regulates air emissions in order to protect public health and welfare. The USEPA is responsible for the implementation of portions of the CAA[64] of 1970, which regulates certain stationary and mobile sources of air emissions and other requirements. Charged with handling global, international, national, and interstate air pollution issues and policies, the USEPA sets national vehicle and stationary source emission standards, oversees the approval of all State Implementation Plans,[65] provides research and guidance for air pollution programs, and sets NAAQS.[66] NAAQS for the six common air pollutants (O_3, PM_{10} and $PM_{2.5}$, NO_2, CO, Pb, and SO_2) are identified in the CAA.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS.[67] These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA that are most applicable to the Air Basin include Title I, Nonattainment Provisions, and Title II, Mobile Source Provisions.

The NAAQS were also amended in July 1997 to include an 8-hour standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. The NAAQS were amended in September 2006 to include an established methodology for calculating $PM_{2.5}$ and to revoke the annual PM_{10} threshold.

State

California CAA

The California CAA, signed into law in 1988, requires all areas of the State to achieve and maintain the California AAQS by the earliest practicable date.[68] CARB, a part of the CalEPA, is responsible for the coordination and administration of both State and federal air pollution control programs within California. In this capacity, CARB conducts research, sets State AAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB

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63 Clean Air Act, 42 U.S.C. Section 7401–7671q.

64 42 U.S. Code Section 7401.

65 A State Implementation Plan (SIP) is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain National Ambient Air Quality Standards (NAAQS).

66 The NAAQS were established to protect public health, including that of sensitive individuals; for this reason, the standards continue to change as more medical research becomes available regarding the health effects of the criteria pollutants. The primary NAAQS define the air quality considered necessary, with an adequate margin of safety, to protect the public health.

67 42 U.S.C. Section 7502(c)(2).

68 *California Health & Safety Code* Section 40910–40930.

establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions and the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. The CAAQS include more stringent standards than the NAAQS.

California Air Toxics Program

The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[69] In the risk identification step, CARB and the OEHHA determine if a substance should be formally identified, or "listed," as a TAC. Since the inception of the program, a number of such substances have been listed. In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants (HAPs) as TACs.[70] In 1999, CARB completed the final staff report, Update to the Toxic Air Contaminant List.[71] The list represented the priorities for identifying and regulating substances as directed by State law. The report described the process followed by CARB in reviewing and revising the TAC List and presented changes to the list.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs (see below for additional information).[72]

Air Toxics "Hotspots" Program (AB 2588)

AB 2588 was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air.[73] The Air Toxics program's goals include collecting emission data, identifying facilities having localized impacts, ascertaining health risks, notifying nearby residents of significant risks, and reducing those significant risks to acceptable levels. The Air Toxics program provides direction and criteria to facilities on how to compile and submit air toxic emission data required by the "Hot Spots" Program and requires the local air district to prioritize facilities to determine which facilities must perform a health risk assessment. Facilities identified as

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69 *California Health & Safety Code* Section 39650–39675.

70 *See California. Health & Safety Code* Section 39657(b); *see also* 17 Cal. Code Regs. Section 93001; *see also* Cal. Air Res. Bd., *Background on California's Air Toxics Program* (last revised Oct. 22, 1997). https://ww2.arb.ca.gov/sites/default/files/classic/toxics/tac/appendxb.htm. Accessed September 2025.

71 CARB. *Update to the Toxic Air Contaminant (TAC) List—Final* (Final Staff Report) (Dec. 1999). https://ww2.arb.ca.gov/sites/default/files/classic/toxics/id/finalstaffreport.htm. Accessed September 2025.

72 *California Code Regs.* tit. 13, Section 2485

73 *California Health & Safety Code* Section 44300–44394.

high risk are required to reduce their toxic emissions to acceptable levels as determined by the local air district.[74]

California Code of Regulations (CCR)

The CCR includes regulations that pertain to air quality emissions. Specifically, 13 Cal. Code of Regs. Section 2485 limits idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction to 5 minutes at any location. Additionally, 17 Cal. Code of Regs. Section 93115 requires operation of any stationary, diesel-fueled, compression-ignition engines meet specified fuel and fuel additive requirements and emission standards.

California Motor Vehicle Code

The vehicle programs are a critical component in the SIP for achieving national ambient air quality standards in the South Coast.[75] They are also integral in CARB's Scoping Plan[76] to achieve the greenhouse gas (GHG) emission reduction goals that were established through the California legislation and Executive Orders. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13 of the California Code of Regulations, Section 2485).

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling[77] measure includes regulations that pertain to air quality emissions. Specifically, Section 2485 states that the idling of all diesel-fueled commercial vehicles weighing more than 10,000 pounds shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR[78] states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

CARB Rule 2449, General Requirements for In-Use Off-Road Diesel-Fueled Fleets

CARB Rule 2449 requires off-road diesel vehicles to limit nonessential idling to no more than five consecutive minutes.[79]

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74 CARB. "AB 2588 Air Toxics 'Hot Spots' Program." http://www.arb.ca.gov/ab2588/ab2588.htm. Accessed January 2024.

75 CARB. "California State Implementation Plans." (last reviewed September 21, 2018). https://www.arb.ca.gov/planning/sip/sip.htm. Accessed January 2024.

76 CARB. *AB 32 Scoping Plan* (January 8, 2018). https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm. Accessed January 2024.

77 CARB. "Section 2485 in Title 13 of the CCR." https://www.arb.ca.gov/msprog/truck-idling/13ccr2485_09022016.pdf. Accessed January 2024.

78 CARB. *Final Regulation Order: Amendments to the Airborne Toxic Control Measure For Stationary Compression Ignition Engines* (May 19, 2011). https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/finalreg2011.pdf. Accessed January 2024.

79 CARB. *Final Regulation Order: Regulation For In-Use Off-Road Diesel-Fueled Fleets*. https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation. Accessed January 2024.

California Building Standards Code

California Energy Code

California's Energy Efficiency Standards for Residential and Nonresidential Buildings[80] were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the design of building shells and components to conserve energy.[81] The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The California Energy Commission adopted the Title 24 standards as well as the most recent 2022 Title 24 standards, which became effective on January 1, 2023, and are applicable to the Project. The 2022 standards will continue to improve upon prior Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings.[82]

California Green Building Code

The California Green Building Standards Code, which is Part 11 of the CCR, is commonly referred to as the CALGreen Code.[83] The most current version of the CALGreen building code went into effect in January 2023. The purpose is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, outdoor lighting standards, use and occupancy, location, and maintenance of all building and structures within its jurisdiction.

Regional

Ventura County Air Pollution Control District

The Project Site lies within the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD), and compliance with VCAPCD rules and guidelines is required. VCAPCD is responsible for regulating emissions primarily from stationary sources. VCAPCD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the Air Basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as "nonattainment" of the national and/or California AAQS. The term "nonattainment area" is used to refer to an air basin in which one or more AAQS are exceeded.

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80 California Energy Commission. "2019 Building Energy Efficiency Standards." https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency. Accessed January 2024.

81 Cal. Code Regs. tit. 24, pt. 6, Section 140.3.

82 California Energy Commission. "2022 Building Energy Efficiency Standards." https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency. Accessed January 2024.

83 California Buildings Standards Commission. California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11). http://www.bsc.ca.gov/Home/CALGreen.aspx. Accessed January 2024.

The VCAPCD adopted the Final 2022 Ventura County AQMP on December 13, 2022.[84] The 2022 AQMP includes transportation control measures developed by SCAG from the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as well as the integrated strategies and measures needed to meet the NAAQS. The 2022 AQMP includes strategies to meet the 8-hour ozone NAAQS as well as the latest 24-hour and annual $PM_{2.5}$ standards.

Under the Federal CAA, VCAPCD has adopted federal attainment plans for O_3.[85] The VCAPCD reviews projects to ensure that they would not (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay the timely attainment of any air quality standard or any required interim emission reductions or other milestones of any federal attainment plan.

The VCAPCD is responsible for limiting the number of emissions that can be generated throughout the Ventura County portion of the Air Basin by various stationery, area, and mobile sources. Specific rules and regulations have been adopted by the VCAPCD Governing Board. These rules and regulations limit the emissions that can be generated by various uses or activities and identify specific pollution reduction measures, which must be implemented in association with various uses and activities. These rules not only regulate the emissions of the federal and State criteria pollutants, but also toxic air contaminants and acutely hazardous materials. The rules are also subject to ongoing refinement by VCAPCD.

Among the VCAPCD rules applicable to the Project are Rule 50 (Opacity), Rule 51 (Nuisance), Rule 55 (Fugitive Dust), Rule 55.1 (Paved Road and Public Unpaved Roads), Rule 55.2 (Street Sweeping Equipment), and Rule 74.2 (Architectural Coating). Rule 50 sets opacity standards on the discharge from sources of air contaminants. Rule 51 prohibits any person from discharging air contaminants or any other material from a source that would cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endangers the comfort, health, safety, or repose to any considerable number of persons or the public. Rule 55 requires fugitive dust generators, including construction and demolition projects, to implement control measures limiting the amount of dust from vehicle track-out, earth moving, bulk material handling, and truck hauling activities. Rule 55.1 requires fugitive dust generators to begin the removal of visible roadway accumulation within 72 hours of any written notification from the VCAPCD. The use of blowers is expressly prohibited under any circumstances. This rule also requires controls to limit the amount of dust from any construction activity or any earthmoving activity on a public unpaved road. Rule 55.2 requires the use of PM10-efficient street sweepers for routine street sweeping and for removing

84 VCAPCD. *2022 Air Quality Management Plan*.

85 VCAPCD. *Final 2016 Ventura County Air Quality Management Plan*. Adopted by the Ventura County Air Pollution Control Board (Feb. 14, 2017). https://www.vcapcd.org/final-2016-ventura-county-air-quality-management-plan-adopted-by-the-ventura-county-air-pollution-control-board/.

vehicle track-out pursuant to Rule 55. Rule 74.2 sets limits on the VOC content of architectural coatings.

Ventura County Air Quality Assessment Guidelines (Guidelines)

In 2003, the VCAPCD prepared its Guidelines to assist local government agencies and consultants in preparing environmental documents for projects subject to CEQA. The Guidelines describe the criteria that VCAPCD uses when reviewing and commenting on the adequacy of environmental documents. The Guidelines provide the most up-to-date recommended thresholds of significance in order to determine if a project will have a significant adverse environmental impact. VCAPCD provides information in the Guidelines including methodologies for estimating project emissions and mitigation measures that can be implemented to avoid or reduce air quality impacts.[86] As discussed previously, air quality in the Air Basin has improved substantially over the years, primarily due to the impacts of air quality control programs at the federal, State, and local levels. Air quality levels continue to trend downward as the economy and population increase, demonstrating that it is possible to maintain a healthy economy while improving public health through air quality improvements.

Southern California Association of Governments (SCAG)

SCAG is the metropolitan planning organization (MPO) for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),[87] SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to air quality planning, SCAG has most recently prepared and adopted the 2024–2050 RTP/SCS,[88] which includes a SCS that addresses regional development and growth forecasts. The SCAG 2024–2050 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving a 19%

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86 VCAPCD. *Ventura County Air Quality Assessment Guidelines*. http://www.vcapcd.org/pubs/Planning/VCAQGuidelines.pdf. Accessed August 2024.

87 California Health and Safety Code. Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b). https://law.justia.com/codes/california/2014/code-hsc/division-26/part-3/chapter-5.5 Accessed August 2024.

88 Southern California Association of Governments (SCAG). *Final Connect SoCal: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategies*. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-ch-05-measuring-our-progress-040424.pdf?1712261492. Accessed April 2024.

reduction by 2035, and 21% reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an air quality plan, consistency with the RTP/SCS has air quality implications, including the reduction of VMT which reduces air quality emissions.

Local

City of Oxnard General Plan

Local jurisdictions, such as the City of Oxnard (City), have the authority and responsibility to reduce air pollution through their police power and decision-making authority. With respect to land use decisions, the City is responsible for the assessment of potential air quality impacts and the identification of feasible mitigation measures related to air emissions associated with proposed projects.

The City's General Plan contains goals and policies to guide decision making in the City for day-today and long-term strategic planning and operations in the City. The following City of Oxnard General Plan policies and goals, located in Chapter 5: Environmental Resources, are applicable to air quality.

Goal SC-3: Energy efficiency performance standards and generation from renewable sources.

Policy SC-3.1: ***New Residential Development.***

Encourage incorporation of passive and active energy and resources conservation design and devices in new residential development and substantial remodels and/or expansions.

Policy SC-3.2: ***Develop a City Energy Action Plan.***

Develop an Energy Action Plan (EAP) that identifies feasible programs that reduce energy consumption within City government facilities and the City vehicle fleets by at least ten percent below 2005 levels.

Policy SC-3.3: ***Develop a Community Energy Action Plan.***

Develop a Community Energy Action Plan that identifies feasible programs that reduce private sector and institutional consumption of energy.

Policy SC-3.4: ***Alternative Energy for Public Buildings.***

As part of the City and Community EAP's, transition City and other semi-public and large energy users to solar and wind energy sources over a reasonable and feasible time period.

Policy SC-3.5: ***Load Shifting Devices.***

As part of the City EAP, consider installing devices on municipal buildings that reduce the power required to operate equipment and for shifting the equipment usage to off-peak hours.

Policy SC-3.6: ***Targets for Zero-Emission Vehicles.***

As part of the City EAP, meet or exceed state targets for zero-emission fuel vehicle miles traveled within the City by supporting the use of zero-emission vehicles (low speed "neighborhood electric vehicles", utility low-range battery electric vehicles, mid-range "city electric vehicles", full function battery electric vehicles, and fuel cell vehicles) within City departments and divisions.

Policy SC-3.7: ***Renewable Energy Production Requirement.***

As part of the City and Community EAP's, require that master planned commercial and industrial developments incorporate solar, wind, and other renewable energy generation and transmission equipment unless demonstrated to the satisfaction of a qualified renewable energy consultant to be infeasible.

Policy SC-3.8: ***Require Use of Passive Energy Conservation Design.***

As part of the City and Community EAP's, require the use of passive energy conservation by building material massing, orientation, landscape shading, materials, and other techniques as part of the design of local buildings, where feasible.

Policy SC-3.9: ***Promote Voluntary Incentive Programs.***

Promote voluntary participation in incentive programs to increase the use of solar photovoltaic systems in new and existing residential, commercial, institutional, and public buildings, including continued participation in the Ventura County Regional Energy Alliance (VCREA).

Policy SC-3.10: ***Alternatives to Power Plant Generation.***

Evaluate the feasibility of incorporating alternative sources of power generation such as wind and tidal power into the regional existing power supply grid to reduce reliance on GHG emission producing public utility and privately-owned power

plants.

Policy SC-3.11: ***Waste conversion to Energy Facility.***

As part of the City and Community EAP's, evaluate the feasibility for the design and construction of a conversion technology capable of converting municipal solid waste into alternative sources of energy.

Policy SC-3.12: ***Encourage Natural Ventilation.***

Review and revise applicable planning and building policies and regulations to promote use of natural ventilation in new construction and major additions or remodeling consistent with Oxnard's temperate climate.

Goal SC-4: Implementation of the California Green Building Code.

Policy SC-4.1: ***Green Building Code Implementation.***

Implement the 2010 California Green Building Code as may be amended (CALGREEN) and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.

Goal CD-1: A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.

Policy CD-1.7: ***Compact Development.***

Promote the use of development patterns that are more compactly built and use space in an efficient aesthetic manner as part of the community vision.

Policy CD-1.9: ***Commute Reduction.***

Minimize the commuting distances between residential concentrations and employment centers by encouraging the development of mixed land uses in appropriate areas.

Goal CD-5: Development of industrial uses in appropriate areas, assistance in the location of new industry, retention and expansion of existing industry, and maintenance of the City's economic vitality.

Policy CD-5.2: ***Compatible Land Use.***

Ensure adequate separation between sensitive land uses (residential, educational, open space, healthcare) to minimize land use incompatibility associated with noise, odors, and air pollutant emissions.

Policy CD-5.4: ***Environmentally Friendly and "Green" Industry.***

Seek to attract industrial development that avoids or minimizes substantial pollution, noise, glare, odor, use of hazardous materials, or other offensive activity and/or is a component of the emerging Green industry.

Policy CD-5.5: ***"Green" Major Transportation Routes.***

Guide industrial development to locate near transportation facilities capable of handling goods movements in an efficient manner without decreasing the level of service on the transportation network or dividing existing neighborhoods.

Goal CD-8: Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.

Policy CD-8.5: ***Impact Mitigation.***

Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.

Policy CD-8.9: ***Jobs/Housing Balance & Sustainable Communities***

Strategy (SB 375). Incorporate inter- and intra-city jobs/housing balance in the development of the regional and subregional Sustainable Communities Strategy (SB 375), Urban Village strategy and strategic plans, with the main intent to reduce single-occupancy work-related vehicular trips.

Goal ICS-5: A passenger railroad system that serves the needs of the residents, visitors, and workers.

Policy ICS-5.1: ***Enhanced Passenger Rail Service.***

Encourage improved rail passenger service on Amtrak and Metrolink, including commuter service and other express services to Santa Barbara, East Ventura County, and Los Angeles County.

Policy ICS-5.2: ***Passenger Rail Service Expansion.***

Support improvement and expansion of the Santa Paula Branch Line and the Ventura County Railway for regular passenger railroad service.

Policy ICS-5.3: ***Sub Regional Transportation Centers.***

Develop one or more sub-regional multimodal-transit transfer centers within Urban Villages (including The Village, RiverPark, Sakioka Farms specific plans) and other appropriate areas in cooperation with Gold Coast Transit that could include a local collector shuttle service, access to Gold Coast service, commuter parking and access to regional commuter buses, shuttle service to the Oxnard Transit Center, access to vehicle rental or subscription services, bicycle parking and services, and the like. This policy is intended to support SB 375 and the regional Sustainable Communities Strategy.

Goal ICS-6: Public transit system that serves the needs of the residents and workers of Oxnard.

Policy ICS-6.1: ***Transit Facilities for New Developments.***

Include transit facilities such as bus benches, shelters, pads, or turnouts, where appropriate, in new development improvement plans.

Policy ICS-6.6: ***Alternative Transit Options.***

Utilize, where feasible, environmentally clean transit vehicles such as liquefied natural gas and hybrids.

Goal ICS-7: Effective Transportation Demand Management (TDM) programs that help achieve air quality goals and minimize congestion.

Policy ICS-7.1: ***Require Transportation Demand Management.***

Programs (TDM). Consider requiring TDM programs with preferred parking, car pool and van pool vehicles, and ride sharing where feasible and appropriate.

Policy ICS-7.2: ***Reduce Single-Occupancy Automobile Dependency.***

Reduce single-occupancy automobile use and increase the use of alternative forms of transportation as a means of reducing energy consumption and vehicle emissions.

Policy ICS-7.3: ***Travel Patterns.***

Promote compact, mixed use development patterns that compliment and encourage TDM programs, pedestrian and bicycle travel, and transit use.

Policy ICS-7.4: ***Park and Ride Lots.***

Coordinate with Caltrans District Seven and the Ventura County Transportation Commission (VCTC) to designate specific locations for Park and Ride lots to support ride sharing and other commuting options.

Goal ICS-8: Safe bicycle and pedestrian circulation throughout the City.

Policy ICS-8.2: ***Bicycle Route Plan.***

Plan a citywide system of safe, efficient, and attractive bicycle routes for commuter, school, and recreational use. Maintain a bicycle route map in the office of the City Traffic Engineer that is widely available for public use.

Policy ICS-8.4: ***New Development Requires Bicycle Improvements.***

Where designated, require proposed developments to include bicycle paths and / or lanes in their plan and to clearly indicate possible bicycling hazards such as speed bumps and storm drain inlet grates in parking lots.

Policy ICS-8.5: ***Public Sidewalks and Pedestrian Orientation.***

Consider and require where appropriate and feasible the enhancement of the pedestrian environment as part of private development and public works projects, especially for public sidewalks.

Policy ICS-8.11: ***Bicycle Parking and Storage.***

Develop standards for safe and adequate facilities for storing and locking bicycles at business and employment centers, recreation areas, and major public facilities.

Policy ICS-8.13: ***Importance of Pedestrian and Bicycle Access in Site Planning.***

Require that new development treat pedestrian and bicycle circulation as equal to or preferred to vehicular access in site design including, but not limited to, access to neighborhood

and commercial shopping centers, schools, and parks.

Goal ICS-10: Improved and safe commercial air carrier services.

Policy ICS-10.3: ***Airport Operations Monitoring.***

Monitor impacts, such as vehicle congestion, overflight noise, and air pollution, from operations at the Oxnard Airport and work with the County Department of Airports to reduce these impacts if they are excessive.

Goal ICS-15: Managed development adjacent to closed landfill areas that mitigate health and safety hazards.

Policy ICS-15.2: ***Avoiding Sensitive Land Uses in Areas Adjacent to Landfills.***

Establish a safe buffer zone distance around inactive landfills within which no sensitive or residential land uses are permitted unless a thorough study of emissions from the facility is conducted and it is determined that no adverse health effects or significant odor impacts would occur.

Goal ER-14: Improved air quality and minimized adverse effects of air pollution on human health and the economy.

Policy ER-14.1: ***Incorporate VCAPCD AQMP Mitigations.***

Incorporate construction and operation mitigation measures recommended or required by the current Ventura County Air Quality Management Plan (AQMP) when preparing CEQA reviews, as appropriate.

Policy ER-14.2: ***Transportation Demand Management (TDM).***

Employ best traffic management practices such as bus turnouts and traffic signal synchronization in order to reduce traffic-related air emissions impacts; require commercial developers to improve public transit service between residential and employment uses or shopping centers, bike lanes and protected bicycle parking areas, and other project features that would reduce the need for automobile trips related to the development; and require Transportation Management Associations (TMA) for projects that may have adverse air quality impacts related to mobile sources and contributions to off-site TDM funds to reduce residual impacts that cannot be mitigated on a project-specific basis.

Policy ER-14.3: ***Reducing Carbon Monoxide Exposure at Congested Intersections.***

Require mitigation measures that consider prohibiting the construction of residences or buildings lacking ventilation systems at congested intersections with the potential for excessive Carbon Monoxide "hot spot" exposure to sensitive receptors.

Policy ER-14.4: ***Emission Control Devices.***

Require all construction equipment to be maintained and tuned to meet appropriate EPA, CARB, and VCAPCD emissions requirements and when new emission control devices or operational modifications are found to be effective, such devices or operational modifications are required on construction equipment.

Policy ER-14.5: ***Reducing Construction Impacts during Smog Season.***

Require that the construction period be lengthened to minimize the number of vehicles and equipment operating at the same time during smog season (May though October).

Policy ER-14.6: ***Minimizing Dust and Air Emissions through Permitting Requirements.***

Continue to require mitigation measures as a condition of obtaining building or use permits to minimize dust and air emissions impacts from construction.

Policy ER-14.7: ***Mitigation Monitoring.***

Ensure that projects with identified air quality impacts in their respective EIRs are subject to effective mitigation monitoring as required by AB 3180.

Policy ER-14.8: ***Regional Cooperation and SB 375.***

Cooperate with other local, county, regional, and State agencies in implementing air quality plans to achieve State and Federal Ambient Air Quality Standards and in preparing, adopting, and implementing the SCAG Sustainable Communities Strategy (SB 375).

Policy ER-14.9: ***Participate in Regional Partnerships.***

Participate with cities, surrounding counties, and regional agencies such as VCOG and VCTC and SCAG to address cross-jurisdictional and regional transportation and air quality issues.

Policy ER-14.10: ***Consultation with Ventura County Air Pollution Control District.***

Consult with the Ventura County Air Pollution Control District (VCAPCD) during CEQA review for projects that require air quality impact analysis and ensure that the VCAPCD is on the distribution list for all CEQA documents.

Policy ER-14.11: ***Support Regional Attainment Plans.***

Support recommendations to reduce air pollutants found in the VCAPCD local attainment plans and use its regulatory authority to mitigate "point" sources of air pollution (e.g., factories, powerplants, etc.).

Policy ER-14.12: ***Use VCAPCD Air Quality Assessment Guidelines.***

Use the VCAPCD Air Quality Assessment Guidelines and recommended analytical tools for determining and mitigating project air quality impacts and related thresholds of significance for use in environmental documents. The City shall continue to cooperate with the VCAPCD in the review of development proposals.

Policy ER-14.13: ***Co-locate Ancillary Services.***

Strongly encourage the location of ancillary employee services (including, but not limited to, child care, restaurants, banking facilities, convenience markets) at major employment centers for the purpose of reducing midday vehicle trips.

4.3.4 Significance Thresholds

a) Would the project conflict with or obstruct implementation of the Ventura County AQMP?

b) Would the project result in a cumulatively considerable net increase of any criteria air pollutant in excess of quantitative thresholds recommended by the VCAPCD?

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

4.3.5 Methodology

Emissions Inventory Modeling

The California Emissions Estimator Model, known as CalEEMod, is the CARB–approved computer program model recommended by VCAPCD for use to quantify air quality emissions. CalEEMod was developed under by the South Coast Air Quality Management District, with input from other California air districts. CalEEMod utilizes widely accepted models for emissions estimates combined with appropriate data that can be used if site-specific information is not available. For example, CalEEMod incorporates USEPA-developed emission factors; CARB on-road vehicle emissions model (EMFAC2021)[89] to calculate the emission rates specific for Ventura County for construction-related employee vehicle trips and the CARB off-road emissions model (OFFROAD2011); and studies commissioned by other California agencies, such as the California Energy Commission and California Department of Resources Recycling and Recovery (CalRecycle).

CalEEMod provides a platform to calculate both construction emissions and operational emissions from a land use development project. CalEEMod version 2022.1.1.30 was used to quantify the Project's air quality pollutants. Project development would generate air pollutants from a number of individual sources during both construction and post-construction (operational) use of the buildings and related activities (e.g., painting operations and landscape maintenance). The following emission sources are included in CalEEMod model:

- One-time construction emissions associated with site clearing and demolition, grading, construction of the retaining walls, utilities, buildings, and landscaping. Emission sources include both off-road construction equipment and on-road mobile equipment associated with workers and the delivery of construction materials to the Project Site. Construction emissions associated with dust control and disposal of waste at landfills are also included in the CalEEMod model.
- Operational emissions associated with the proposed uses, including on-road mobile vehicle traffic generated by the land uses; off-road emissions from landscaping equipment; energy (i.e., electricity) and water usage in the buildings; and emissions from emergency generators, painting operations, and fuel use. The disposal of solid waste generated during the postconstruction use of the buildings is also included in the CalEEMod model.

Refer to **Section 2.0: Project Description** of this EIR, for more detailed characteristics of the Project. Information needed to parameterize the Project in CalEEMod was obtained from the Project Applicant.

89 EMFAC is an emissions factor model used to calculate emissions rates from on-road vehicles (e.g., passenger vehicles). OFFROAD is an emissions factor model used to calculate emission rates from off-road mobile sources (e.g., construction equipment). CalEEMod version 2022.1 utilizes CARB's 2022 version of EMFAC.

Construction

Construction emissions for Del Sol High School were analyzed in the Oxnard Union High School District (OUHSD) New High School No. 8 Environmental Impact Report (High School EIR).[90] The maximum emissions identified in the High School EIR are shown in **Table 4.3-5: Maximum Del Sol High School Construction Emissions**. As mentioned previously, 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.

Required to comply with the applicable General Plan goal and policies, the High School EIR identified Mitigation Measure MM AQ-1 to minimize fugitive dust emissions. These measures are standard practice pursuant to the Oxnard General Plan, VCAPCD Rules, and CARB's off-road regulations during project construction to reduce emissions exceeding the VCAPCD's thresholds of significance of 25 pounds per day for VOC and CO. With compliance with Mitigation Measure MM AQ-1, the High School EIR determined construction impacts would be less than significant.

TABLE 4.3-5: MAXIMUM DEL SOL HIGH SCHOOL CONSTRUCTION EMISSIONS

Project Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Unmitigated						
2020	9.0	90.3	65.9	0.2	20.5	12.0
2021	284.3	48.7	46.8	0.1	6.4	2.9
2022	3.4	29.9	28.3	0.1	5.3	1.9
Mitigated						
2020	4.5	65.9	74.7	0.7	10.4	5.5
2021	283.2	45.4	54.0	0.1	6.4	2.9
2022	2.5	29.9	31.3	0.1	5.4	2.1
Threshold Significance	*None*	*None*	*None*	*None*	*None*	*None*
Significant?	No	No	No	No	No	No

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Source: Oxnard Union High School District. Draft Environmental Impact Report New High School No. 8. https://files.ceqanet.opr.ca.gov/64030-2/attachment/Hgni8w7hLuA--vUekhSzn9XYr0Sm3HeBZzNz0gIEgLi2hyCNwU3RKEqpKLaz0TSjMy-QTA2bLkKSYIvb0. Accessed March 2026.

Table 4.3-6: Project Construction Schedule provides the dates and durations of each of the activities that will take place during construction, as well as a brief description of this work. It is important to note that the construction schedule used in CalEEMod represents a conservative and representative sequencing of activities. Minor adjustments to the specific timing of construction

90 Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*.

phases may occur during final project implementation. However, provided that the overall construction duration, equipment mix, and daily activity levels remain consistent with those assumed in the modeling, such shifts in the construction schedule would not result in an increase in total emissions.

Emission estimates in CalEEMod are primarily driven by the duration and intensity of construction activities rather than the specific calendar months in which they occur. As such, a shift in construction timing without an increase in overall duration would result in similar or slightly lower emissions due to variations in emission factors and environmental conditions. Therefore, the modeled emissions represent a conservative estimate of potential construction-related air quality impacts.

Construction of Del Sol High School began in 2020. The classroom buildings are complete, and the school is currently operating at half capacity. Completion of the athletic fields and facilities and related improvements is anticipated to be completed by the end of 2025, prior to the start of construction of any of the residential and commercial uses planned in Areas A and C.

Each phase of construction would result in varying levels of intensity and number of construction personnel. An estimate of the number of daily one-way truck trips was provided by the applicant based on the construction characteristics of the Project, and one-way worker and vendor trips were estimated by the CalEEMod model. Vendor trips estimated by CalEEMod include the use of water trucks during construction. CalEEMod estimates the number of trips based on the size of the Project Site, the proposed land uses, and the number of pieces of equipment used. CalEEMod rounds this value to the nearest whole number.

Daily one-way truck trips were provided by the applicant based on the construction characteristics of the Project, and one-way worker and vendor trips are based on CalEEMod defaults. Vendor trips provided by CalEEMod account for water trucks during construction. CalEEMod estimates the number of trips based on the size of the Project Site, the land use of the Project, and the number of pieces of equipment being used. CalEEMod rounds this value to the nearest whole number.[91] During construction of Area A, there would be 20 worker trips and 100 haul truck trips per day, during building construction there would be 484 worker trips and 76 vendor trips per day, during paving there would be 15 worker trips per day, and during architectural coating there would be 97 worker trips per day. During construction of Area C, there would be 15 worker trips and 16 haul truck trips per day, during grading there would be 20 worker trips and 75 haul truck trips per day, during building construction there would be 213 worker trips and 32 vendor trips per day, during paving there would be 115 trips

91 CalEEMod expresses construction worker, vendor, and haul activity as average daily one-way trips, and the model calculates emissions proportionally based on those trip inputs rather than requiring whole round trip integers. Default trip values may therefore appear as fractional or odd numbers because they represent average daily activity rates over the duration of each construction phase, consistent with CalEEMod methodology.

per day, and during architectural coating there would be 43 trips per day. An assessment of air pollutant emissions was prepared utilizing the construction schedule in **Table 4.3-6**.

TABLE 4.3-6: PROJECT CONSTRUCTION SCHEDULE

Construction Activity	Approximate Start Date	Approximate End Date	Duration (Days)	Description
		Area B		
Building Construction	1/1/2020	12/31/2025	2,191	Completion of the existing Del Sol High School
		Area A		
Grading	1/1/2027	9/1/2027	174	Grading of Project Site (Export of 212,000 cubic yards of soil)
Building Construction	9/2/2027	12/3/2031	1,110	Construction of Proposed Project
Paving	12/4/2031	3/4/2032	65	Paving of asphalt surfaces
Architectural Coating	12/4/2031	9/4/2032	197	Application of architectural coatings to building materials
		Area C		
Demolition	1/1/2027	1/29/2027	20	Demolition of existing structures (30,000 square feet of structures)
Grading	1/30/2027	3/12/2027	30	Grading of Project Site (Export of 18,000 cubic yards of soil)
Building Construction	3/13/2027	5/6/2028	300	Construction of Proposed Project
Paving	5/7/2028	6/3/2028	20	Paving of asphalt surfaces
Architectural Coating	5/7/2028	9/9/2028	90	Application of architectural coatings to building materials

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study.* **Appendix E.**

Table 4.3-7: Project Construction Diesel Equipment Inventory identifies the construction equipment for each activity described in **Table 4.3-6**. Due to limited construction information available during the preparation of this analysis, the default equipment inventory assumptions in CalEEMod were used. CalEEMod generates the default equipment list provided below based on the proposed land uses. CalEEMod generates defaults for the fuel type, engine tier, number of equipment operating per day, daily operational hours per equipment, and the equipment horsepower and load factor. Under regulatory compliance measures in CalEEMod, construction would be required to adhere to VCAPCD Rule 55 (Fugitive Dust) and Rule 74.2 (Architectural Coatings). Additionally, as shown in **Table 4.3-7**, construction of Area A and Area C are conservatively estimated to occur at the same time, when in reality they may be staggered and their impacts lessened as a result. As such, the emission estimates provided below account for maximum emissions of construction of Area A and Area C occurring concurrently. As mentioned above, the remaining construction of the Del Sol School High School site, Area B, would be completed by the end of 2025, prior to the start of

construction of Area A and Area C. Construction details for Del Sol High School are provided in the OUSHD New School No. 8 EIR.[92]

TABLE 4.3-7: PROJECT CONSTRUCTION DIESEL EQUIPMENT INVENTORY

Phase	Off-Road Equipment Type	Amount	Daily Hours	Horsepower [HP] (Load Factor)
	Area A			
Grading	Graders	1	8	148 (0.41)
	Excavators	2	8	36 (0.38)
	Tractors/Loaders/Backhoes	2	8	84 (0.37)
	Scrapers	2	8	423 (0.48)
	Rubber Tired Dozers	1	8	367 (0.40)
Building Construction	Forklifts	3	8	82(0.20)
	Generator Sets	1	8	14(0.74)
	Cranes	1	7	367(0.29)
	Welders	1	8	46(0.45)
	Tractors/Loaders/Backhoes	3	7	84(0.37)
Architectural Coating	Pavers	2	8	81(0.42)
	Paving Equipment	2	8	89(0.36)
	Rollers	2	8	36(0.38)
	Air Compressors	1	6	37(0.48)
	Area C			
Demolition	Rubber Tired Dozers	2	8	148 (0.41)
	Excavators	3	8	36 (0.38)
	Concrete/Industrial Saws	1	8	84 (0.37)
Grading	Graders	1	8	423 (0.48)
	Excavators	2	8	367 (0.40)
	Tractors/Loaders/Backhoes	2	8	82(0.20)
	Scrapers	2	8	14(0.74)
	Rubber Tired Dozers	1	8	367(0.29)
Building Construction	Forklifts	3	8	46(0.45)
	Generator Sets	1	8	84(0.37)
	Cranes	1	7	81(0.42)
	Welders	1	8	89(0.36)
	Tractors/Loaders/Backhoes	3	7	36(0.38)
Paving	Pavers	2	8	37(0.48)
	Paving Equipment	2	8	148 (0.41)
	Rollers	2	8	36 (0.38)

92 Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*.

TABLE 4.3-7: PROJECT CONSTRUCTION DIESEL EQUIPMENT INVENTORY				
Phase	Off-Road Equipment Type	Amount	Daily Hours	Horsepower [HP] (Load Factor)
Architectural Coating	Air Compressors	1	6	84 (0.37)

Source: Meridian Consultants. Air Quality, Greenhouse Gas, and Energy Study. **Appendix E.**

Operation

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from the Project Site. In addition, emissions would result from area sources on site, such as landscaping equipment and use of consumer products. Area-source emissions are based on landscaping equipment and consumer product (including paint) usage rates provided in CalEEMod.

Operational emissions were estimated using the CalEEMod software, which was used to forecast the daily regional emissions from area sources that would occur during long-term Project operations. In calculating mobile-source emissions, trip-length values were calculated based on default rates for the Project's land uses provided in CalEEMod.

VCAPCD Air Quality Assessment Guidelines

Because of the regulatory role of the VCAPCD in the Air Basin, the significance thresholds and analysis methodologies in the VCAPCD Air Quality Assessment Guidelines were used to evaluate the significance of project impacts for construction, operations, and air toxics.[93]

Daily Emissions Thresholds

VCAPCD considers construction-related emissions to be temporary and does not recommend quantitative analysis of these impacts for this reason.[94] However, VCAPCD recommends that construction emissions be mitigated if the construction emissions are likely to exceed the significance thresholds for operational emissions. VCAPCD has identified the following thresholds to determine the significance of regional air quality emissions for construction activities and project operation, as shown in **Table 4.3-8: Mass Daily Emissions Thresholds**.

93 VCAPCD. *Ventura County Air Quality Assessment Guidelines*.

94 VCAPCD. *Ventura County Air Quality Assessment Guidelines*.

TABLE 4.3-8: MASS DAILY EMISSIONS THRESHOLDS		
Pollutant	Construction	Operation
	Significant Threshold (pounds/day)	
Volatile organic compounds (VOCs)	25	25
Nitrogen dioxide (NO_X)	25	25
Carbon monoxide (CO)	—	—
Sulfur dioxide (SO_X)	—	—
Respirable particulate matter (PM_{10})	—	—
Fine particulate matter ($PM_{2.5}$)	—	—

Source: VCAPCD, Ventura County Air Quality Assessment Guidelines, http://www.vcapcd.org/pubs/Planning/VCAQGuidelines.pdf. Accessed August 2024.
Notes: (—): No threshold provided by VCAPCD.

Toxic Air Contaminants

As set forth in the VCAPCD Guidelines, the determination of significance of a project with respect TACs shall be made on a case-by-case basis, considering the following factors:

- Proposed new or modified facility that may emit TACs near existing land uses
- New land use proposed near an existing facility that emits TACs.

Carbon Monoxide Hot Spots

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

Consistency with Applicable Air Quality Plans

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the VCAPCD AQMP, the following criteria were used to evaluate the Project's consistency with the VCAPCD AQMP and SCAG regional plans and policies, including the AQMP:

- Will the Project result in any of the following:
  - Increase the frequency or severity of existing air quality violations?
  - Cause or contribute to new air quality violations?

  - Delay the timely attainment of the air quality standards or the interim emission reductions specified in the AQMP?
- Will the Project exceed the assumptions utilized in preparing the AQMP?
- Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based?
- Does the Project include air quality mitigation measures?
- To what extent is Project development consistent with the AQMP land use policies?

Cumulative Threshold

VCAPCD recommends that a project be considered to result in a cumulatively considerable impact to air quality if any construction-related emissions and operational emissions from individual development projects results in a net increase of a criteria pollution that is in nonattainment by comparing a project's emissions to adopted numerical thresholds.[95]

The VCAPCD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

A project is also considered to result in a cumulatively considerable contribution to significant impacts if the population and employment projections for the project exceed the rate of growth defined in VCAPCD's AQMP by SCAG's RTP/SCS population forecasts.

4.3.6 Project Impacts

a) Would the project conflict with or obstruct implementation of the Ventura County AQMP?

The VCAPCD CEQA Air Quality Assessment Guidelines identifies the significance criteria to be used to determine the consistency of a proposed project with the VCAPCD AQMP. First, the Air Quality Assessment Guidelines provide daily thresholds for VOCs and NO_x. Projects that may cause an exceedance of these emissions thresholds have been determined to individually and cumulatively jeopardize attainment of the federal one-hour ozone standard and thus have a significant adverse impact on air quality in Ventura County. Additionally, a demonstration of consistency with the population forecasts used in the most recently adopted AQMP should be used for assessing project consistency with the AQMP. The Air Quality Guidelines also state that the air quality impact assessment should also address project consistency with emission reduction strategies included in the AQMP. Consistency with the AQMP does not mean that a project will not have a significant project-specific adverse air quality impact. However, inconsistency with the AQMP is considered a significant cumulative adverse air quality impact.

95 VCAPCD. *2022 Ventura County Air Quality Management Plan*.

The Air Basin is currently designated as being in nonattainment at the federal level for O_3 and at the State level for O_3 and PM_{10}. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Air Basin. As discussed further in **Table 4.3-10: Maximum Construction Emissions With Mitigation**, temporary emissions associated with construction of the Project would not exceed regional construction thresholds with the implementation of mitigation measures. However, as discussed further below and shown in **Table 4.3-11: Maximum Daily Operational Emissions**, long-term emissions associated with operation would exceed regional operational thresholds. As such, would contribute to air quality violations in the Air Basin and would not be consistent with the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2024–2050 RTP/SCS (Connect SoCal) regarding population, housing, and growth trends.[96]

The 2024–2050 Connect SoCal provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts adopted by the SCAG Regional Council are based on the local plans and policies applicable to the specific area, which are used by SCAG in all phases of implementation and review.

The existing Del Sol High School would remain operating within the Project Site. Additionally, the proposed Sub-Neighborhood Plan would allow for the existing Maulhardt residence to remain as part of a future park. All other buildings and structures on the Project Site would be demolished. As discussed in **Section 4.14: Population and Housing**, the Project is a proposal to allow the development of a residential-mixed use urban village, containing a maximum of 950 residential dwelling units and would result in a maximum population of approximately 2,064 new residents. The City is estimated to have a population of approximately 228,600 people in 2050,[97] and approximately 70,500 residential units in 2050, an increase of 12,248 residential units from the 2025 housing supply of 58,252 residential units.[98] The proposed Project would represent 7.8% of the additional residential units projected in the City by 2050. The proposed Project would represent a fraction of the projected citywide population growth through 2050. Therefore, the proposed Project would not cause the City to exceed population estimates.

Emission reduction strategies included in the AQMP include stationary and transportation source control measures to reduce air pollutant emissions. Stationary control measures included in the

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96 Southern California Association of Governments (SCAG). Connect SoCal 2024: Demographics & Growth Forecast Technical Report 1–4 (Apr. 4, 2024). https://sustain.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf. Accessed October 2025

97 SCAG. *SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Maulhardt-Stiles Sub-Neighborhood Plan Project* [SCAG NO. IGR11182]. March 2025. **Appendix B**.

98 SCAG. *SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Maulhardt-Stiles Sub-Neighborhood Plan Project* [SCAG NO. IGR11182]. March 2025. **Appendix B**.

AQMP include rules previously adopted by VCAPCD. The proposed Project would comply with the applicable VCAPCD rules with the intention of limiting VOC and NO_x emissions, including Rule 74.2 and CARB off-road regulations. Additionally, as discussed further below, the proposed Project would implement **MM AQ-1**, which would require construction equipment to adhere to U.S. EPA Tier 4 final standards, which would further reduce VOC and NO_x emissions during construction.

As shown in **Table 4.3-11**, operational emissions from the full development of the residential, commercial, and other uses allowed by the proposed Sub-Neighborhood Plan would result in emissions that would exceed the regional VOC and NO_x concentration thresholds. The proposed Project would be consistent with the transportation control measures included in the AQMP as implementation of the Sub-Neighborhood Plan would create walkable and bikeable neighborhoods that would connect new residential uses to the surrounding neighborhoods, commercial, recreational, educational, and employment amenities. The proposed Project would include dedicated bike lanes, bicycle parking, and sidewalks. Additionally, the Project Site would be served by the nearby existing transit services, including Gold Coast Transit, which has stops for multiple bus routes within 0.5 miles of the Project Site including #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). The Project Site is also served by Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol. The location of the Project encourages the use of a variety of transportation options, including walking, biking, and using public transit and would reduce mobile emissions. For these reasons, the Project is consistent with AQMP transportation control measures, however emissions would remain above VCPACD thresholds.

Because, as discussed above, the Project operational emissions cannot be mitigated to less than significant. Operational VOC emissions exceed the VCAPCD thresholds, and VOC is a precursor to O3, which the Air Basin is in nonattainment at the federal level for O*3* and at the State level for O*3*. If a project exceeds the regional air pollutant thresholds, then VCAPCD considers emissions from a project to significantly contribute to air quality violations in the Air Basin and not be consistent with the Ventura County AQMP. For these reasons, the inconsistency of the Project with the AQMP is a significant impact.

b) Would the project result in a cumulatively considerable net increase of any criteria air pollutant in excess of quantitative thresholds recommended by the VCAPCD?

According to VCAPCD, individual development projects that generate construction or operational emissions that exceed VCAPCD recommended daily regional or localized thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in nonattainment. As shown in **Table 4.3-2** above, the Air Basin is currently designated as being in nonattainment at the federal level for O_3 and at the State level for O_3, and PM_{10}.

Construction

The Project would be required to comply with the following regulations, as applicable:

- Rule 50, which sets opacity standards on the discharge from sources of air contaminants. This rule would apply during construction of the project
- Rule 51, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- Rule 55, which requires fugitive dust generators, including construction and demolition projects, to implement control measures limiting the amount of dust from vehicle track-out, earth moving, bulk material handling, and truck hauling activities
- Rule 55.1, which requires fugitive dust generators to begin the removal of visible roadway accumulation within 72 hours of any written notification from the VCAPCD. The use of blowers is expressly prohibited under any circumstances. This rule also requires controls to limit the amount of dust from any construction activity or any earthmoving activity on a public unpaved road.
- Rule 55.2, which requires the use of PM10-efficient street sweepers for routine street sweeping and for removing vehicle track-out pursuant to Rule 55
- Rule 74.2, which limits the VOC content of architectural coatings.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

The VCAPCD does not recommend a specific numerical significance threshold for construction, as emissions are considered to be temporary. However, VCAPCD recommends mitigation of construction-related emissions if estimates of ROC and NO_x emissions from the heavy-duty construction equipment exceed 25 pounds per day. Individual construction projects that exceed the VCAPCD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in nonattainment. Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from grading activities, which would be reduced through compliance with VCAPCD Rules 55, 55.1, and 55.2. NO_X emissions would primarily result from the use of construction equipment and truck trips. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. However, such releases would be regulated in compliance with VCAPCD Rule 74.2. The

assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Table 4.3-9: Maximum Construction Emissions Without Mitigation identifies daily emissions that are estimated to occur on peak construction days for each construction phase. Construction of Area A and Area C are conservatively estimated to occur at the same time. As such, the emission estimates provided below account for maximum emissions of both construction of Area A and Area C occurring concurrently. As shown in **Table 4.3-9**, construction emissions associated with the Project would exceed 25 pounds per day for VOC and NO_x without the implementation of mitigation measures.

TABLE 4.3-9: MAXIMUM CONSTRUCTION EMISSIONS WITHOUT MITIGATION

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
		Area A				
2027	3.1	34.4	40.4	0.1	7.4	2.6
2028	2.9	13.5	38.8	<0.1	7.3	2.0
2029	2.8	13.0	37.1	<0.1	7.3	1.9
2030	2.5	12.4	35.7	<0.1	7.3	1.9
2031	24.0	11.9	34.1	<0.1	7.3	1.9
2032	24.0	7.1	15.0	<0.1	1.7	0.5
		Area C				
2027	3.1	32.2	29.9	0.1	5.1	2.4
2028	22.8	10.9	24.3	<0.1	3.4	1.0
Maximum	24.0	34.4	40.4	0.1	7.4	2.6
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	No	**Yes**	No	No	No	No

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E**.

Mitigation Measure (MM) AQ-1 would be implemented to reduce air quality emissions during construction activities. **MM AQ-1,** described further below**,** would ensure that construction equipment used during construction of the project shall meet the U.S. EPA Tier 4 final standards, which would reduce construction emissions. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, the equipment shall, at a minimum, meet the Tier 3 standards. Zero-emissions construction equipment may be incorporated in lieu of Tier 4 final equipment. A copy of each equipment's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each piece of equipment. As shown in **Table 4.3-10: Maximum Construction Emissions With Mitigation**, air

quality emission would not exceed 25 pounds per day for VOC and NO_x with the implementation of **MM AQ-1**. With implementation of this mitigation measure, construction of the proposed Project would not violate any federal or state air quality standard or contribute substantially to an existing or projected air quality standard violation. Construction impacts would be less than significant with mitigation.

TABLE 4.3-10: MAXIMUM CONSTRUCTION EMISSIONS WITH MITIGATION

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
			Area A			
2027	2.4	13.5	42.4	0.1	7.1	1.8
2028	2.3	7.6	40.8	<0.1	7.1	1.8
2029	2.3	7.4	39.1	<0.1	7.1	1.8
2030	2.0	7.5	37.7	<0.1	7.1	1.8
2031	23.7	6.4	36.1	<0.1	7.1	1.8
2032	23.7	3.3	15.7	<0.1	1.5	0.4
			Area C			
2027	1.3	11.4	38.0	0.1	4.3	0.8
2028	22.5	5.0	26.3	<0.1	3.2	1.6
Maximum	23.7	13.5	42.4	0.1	7.1	1.8
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	No	No	No	No	No	No

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E**.

San Joaquin Valley Fever

Nearby sensitive receptors, as well as workers at the Project Site, could be exposed to Valley Fever from fugitive dust generated during construction. There is the potential that cocci spores would be stirred up during excavation, grading, and earth-moving activities, exposing construction workers and nearby sensitive receptors to these spores and thereby to the potential of contracting Valley Fever. However, compliance with VCAPCD Rules 55, 55.1, and 55.2 during construction, which identify measures to reduce fugitive dust and is required to be implemented at all construction sites located within the jurisdiction of the VCAPCD. Compliance with the VCAPCD fugitive dust rule would reduce dust from construction of the proposed Project and would not expose nearby sensitive receptors to the Valley Fever fungus. Accordingly, impacts would be less than significant.

Additionally, the Project would be required to comply with the applicable 2030 General Plan goal and policies which include the following:

- **Goal ER-14**: Improved air quality and minimized adverse effects of air pollution on human health and the economy.

- Policy ER-14.4: Require all construction equipment to be maintained and tuned to meet appropriate EPA, CARB, and VCAPCD emissions requirements and when new emission control devices or operational modifications are found to be effective, such devices or operational modifications are required on construction equipment.
- Policy ER-14.5: Require that the construction period be lengthened to minimize the number of vehicles and equipment operating at the same time during smog season (May through October).
- Policy ER-14.6: Continue to require mitigation measures as a condition of obtaining building or use permits to minimize dust and air emissions impacts from construction.
- Policy ER-14.8: Cooperate with other local, county, regional, and State agencies in implementing air quality plans to achieve State and Federal Ambient Air Quality Standards and in preparing, adopting, and implementing the SCAG Sustainable Communities Strategy (SB 375).
- Policy ER-14.12: Consult with the VCAPCD during CEQA review for projects that require air quality impact analysis and ensure that the VCAPCD is on the distribution list for all CEQA documents.

Compliance with the above General Plan goals and policies would reduce potential emission of criteria pollutants. Therefore, construction of the Project would not generate any significant environmental impacts associated with air quality compliance.

Operation

Operational activities associated with the Project would generate emissions from area and mobile sources. Area-source emissions include, for example, landscape maintenance equipment and consumer products, including paint, based on usage rates in CalEEMod. Mobile source emissions are primarily generated from vehicle trips that would be generated by the Project. Vehicles traveling on paved roads would be generate fugitive emissions due to the generation of road dust inclusive of tire wear particulates. The emission estimates for travel on paved roads were calculated using the CalEEMod model.

The results presented in **Table 4.3-11: Maximum Daily Operational Emissions** are compared to the VCAPCD-established operational significance thresholds as well as the existing emissions on site from the current land uses. As shown in **Table 4.3-11**, operational emissions associated with the Project would exceed the regional VOC and NO_x concentration thresholds. There are no feasible mitigation measures available to mitigate emissions likely to be generated by the operation of subsequent individual development projects in the proposed Sub-Neighborhood Plan Area to less than significant that would be consistent with the objectives of the Sub-Neighborhood Plan. Therefore, operation of the Project would contribute to an existing federal or state air quality standard violation and this would be a significant impact.

TABLE 4.3-11: MAXIMUM DAILY OPERATIONAL EMISSIONS						
Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Mobile	18.3	9.9	102	0.3	27.6	7.1
Area	29.1	0.5	55.9	<0.1	<0.1	<0.1
Energy	0.3	4.4	1.9	<0.1	0.4	0.4
Total Project (Areas A and C)	47.7	14.9	160	0.3	27.9	7.5
Total Del Sol High School Emissions (Area B)	13.8	22.8	68.1	0.2	22.2	6.1
VCAPCD Mass Daily Threshold	25	25	—	—	—	—
Total Emissions (Areas A, B, and C)	61.5	37.7	228.1	0.5	50.1	13.6
Threshold exceeded?	**Yes**	**Yes**	No	No	No	No

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NO_x = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SO_x = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Toxic Air Contaminantsp

The VCAPCD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Locations evaluated for exposure to air pollution include but are not limited to residences, schools, hospitals, and convalescent facilities.

Project construction would result in short-term emissions of diesel particulate matter, which is a toxic air contaminant (TAC). Emissions from combustion of gasoline produce much of the $PM_{2.5}$ emissions found in outdoor air.[99] Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period, as diesel emissions are strongly correlated with $PM_{2.5}$ emissions. As mentioned previously, single-family residential uses, multi-family residential uses, and school uses are located adjacent to the site. Given that the greatest potential for diesel particulate emissions would only occur during excavation/grading activities (approximately 204 days for both Area A and Area C) and other construction activities (approximately 9 years, including construction of Del Sol High School which began in 2020) would result in reduced use of heavy-duty diesel construction equipment in comparison to excavation/grading activities, the Project would not result in a long-term (i.e., 30 year) source of toxic air contaminant (TAC) emissions. No residual TAC emissions and corresponding individual cancer risk are anticipated after

99 CARB. "Inhalable Particulate Matter and Health (PM2.5 and PM10)."

construction. Because there is such a short-term exposure period (105 out of 360 months of 30-years), effects from exposure to diesel particulate emissions would be minimal. The Project would comply with the CARB Air Toxics Control Measure that limits diesel-powered equipment and vehicle idling to no more than five minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. Further the Project would include **MM AQ-1**, which would require construction equipment to adhere to U.S. EPA Tier 4 final standards, which would further reduce emissions of TACs during construction.

The Project would also comply with the requirements of VCAPCD *Rule 62.7* if asbestos is found during renovation and construction activities. Further, **Table 4.3-10** identifies the daily emissions that are estimated for peak construction days for each construction year with mitigation incorporated. As discussed above, construction emissions would not exceed the VCAPCD thresholds with the implementation of mitigation measures, and as such exposure to TACs would not occur.

Project operations would generate only minor amounts of diesel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce emission from existing diesel trucks. In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the criteria used to determine the significance of a potential health risk impact.

Carbon Monoxide Hot Spots

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

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

As shown above in **Table 4.3-11**, daily operational CO emissions would be 260.1 pounds per day. The VCAPCD does not have thresholds for CO because the County is in attainment of CO standards. Based on the low background level of CO in the project area and ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, the proposed Project would

not create new hotspots or contribute substantially to existing hotspots. Localized air quality impacts related to CO hot spots would be less than significant.

4.3.7 Cumulative Impacts

The City's 2030 General Plan Program EIR determined that development allowed by the General Plan would result in future population growth that would increase local and regional air emissions, and that this impact would be significant due to the amount of future growth allowed by the General Plan. Because no additional feasible mitigation measures are currently available to reduce this impact to a less than significant level, this impact was identified as unavoidable in the 2030 General Plan Program EIR.

As discussed above, the proposed Sub-Neighborhood Plan would permit development that would generate emissions that would exceed construction and operational air quality emissions thresholds. With the implementation of regulatory compliance measures such as Rule 55 (Fugitive Dust) and Rule 74.2 (Architectural Coating), and **MM AQ-1,** the Project's construction emissions would not contribute to cumulative emissions for VOC and NO_x. However, the Project would generate operational emissions that exceed VCAPCD recommended daily thresholds. For this reason, the Project's contribution to cumulative air quality emissions would not contribute to any significant cumulative impacts.

As discussed in this Section, operation of the proposed Sub-Neighborhood Plan would contribute to existing violations of air quality standards in the 2022 AQMP for the Ventura County portion of the Air Basin. As such, the Project would contribute to significant impacts. Operational impacts generated by the uses allowed by the proposed Sub-Neighborhood Plan would have a cumulatively considerable contribution to a potential conflict with or obstruction of the implementation of the AQMP regional reduction plans.

4.3.8 Level of Significance Without Mitigation

The impact of the Project on air quality would be significant without mitigation.

4.3.9 Mitigation Measures

As shown in **Tables 4.3-9** and **4.3-11**, estimated construction and operational emissions from future development in the proposed Maulhardt-Stiles Sub-Neighborhood area are likely to exceed daily thresholds. For this reason, the following mitigation measure is proposed to reduce potential emissions to the greatest degree feasible:

MM AQ-1: Construction Equipment. The applicant for an individual development project within the Maulhardt-Stiles Sub-Neighborhood Plan area shall ensure the following requirements are incorporated into applicable bid documents, purchase orders, and contracts. Contractors shall confirm the ability to supply the compliant construction equipment prior to any ground-disturbing and construction activities:

- Mobile off-road construction equipment (wheeled or tracked) greater than 50 hp used during construction of the project shall meet the U.S. EPA Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, the equipment shall, at a minimum, meet the Tier 3 standards. Zero-emissions construction equipment may be incorporated in lieu of Tier 4 final equipment. A copy of each equipment's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each piece of equipment.

4.3.10 Level of Significance After Mitigation

With the implementation of **MM AQ-1,** construction air quality impacts would be reduced to less than VCAPCD thresholds. Air quality impacts from operation would be significant without mitigation. There are no feasible mitigation measures available to mitigate operation emissions likely to be generated by the uses allowed by the proposed Sub-Neighborhood Plan Area to less than significant that would be consistent with the objectives of the Sub-Neighborhood Plan. Therefore, even with the incorporation of mitigation, impacts would remain significant and unavoidable.

4.4 BIOLOGICAL RESOURCES

This section describes existing biological resources within the Project Site and provides an assessment of potential impacts to biological resources from implementation of the proposed Project. As noted in the Initial Study (**Appendix A**), impacts associated with the following Thresholds were determined to be less than significant: c) federally protected waters of the U.S.; and f) conflicting with applicable Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, further detailed evaluation is not provided for these topics because the Project will not create significant impacts in those areas.

This section incorporates information from the Biological Resources Assessment (Biological Assessment) (**Appendix F**) prepared for the proposed Project Site by Pax Environmental, Inc. (Pax). This assessment included a literature and desktop review of biological databases and the results of a field survey.

4.4.1 Existing Conditions

General Project Site Conditions

Area A is currently undeveloped land that has been subject to previous disturbance for agricultural use; Area B is developed with Del Sol High School; and Area C contains an existing home, barn, cottages, outbuildings, other agricultural structures and a small lemon orchard that is no longer actively cultivated. The proposed Sub-Neighborhood Plan would allow development of Areas A and C, approximately 56 acres. For this reason, the Biological Assessment addresses Areas A and C.

The Project Site and surrounding environment have been historically utilized for agricultural purposes. Since the area was purchased in 1872, the Maulhardt family has grown sugar beets, grains, row crops, hosted a small fruit orchard, and a variety of livestock. Goat grazing for vegetation maintenance occurs within Areas A and C regularly.

Vegetation Communities and Land Uses

The Project Site has one vegetation community: coyote brush scrub (*Baccharis pilularis Shrubland Alliance*) and three land uses: disturbed, developed, and fallow orchard. Plant species observed during the field survey of the Project Site were typical of this vegetation community and/or existing land uses and depicted in **Figure 4.4-1** and **Table 4.4-1: Vegetation Community and Land Uses within the Project Site** below.

The potential for special-status plant species to be present on the Project Site and a list of observed plant species is included in the Biological Assessment (**Appendix F**). A total of 43 plant species were observed during the surveys, 13 native (approximately 30%) and 30 non-native (approximately 70%). No special-status plant species were observed within the Project Site during the field survey of the

Project Site. In addition, no protected trees (as defined by the City tree ordinance)[1] were documented in the Project Site. There is no critical habitat for any federally listed plants within or surrounding the Project Site.

TABLE 4.4-1: VEGETATION COMMUNITY AND LAND USES WITHIN THE PROJECT SITE

Vegetation Community and Land Uses	Acreage	% Coverage of Project Site
Coyote Brush Scrub	25.7	45.6
Disturbed	17.8	31.6
Developed	8.2	14.6
Fallowed Orchard	4.6	8.2
Total	**56.3**	**100.0**

Source: Pax. *Biological Resources Assessment for the Maulhardt/Stiles Family Property Sub-Neighborhood Plan, Oxnard, California*. August 2025.

Coyote Brush Scrub (Baccharis.pilularis.Shrubland Alliance)

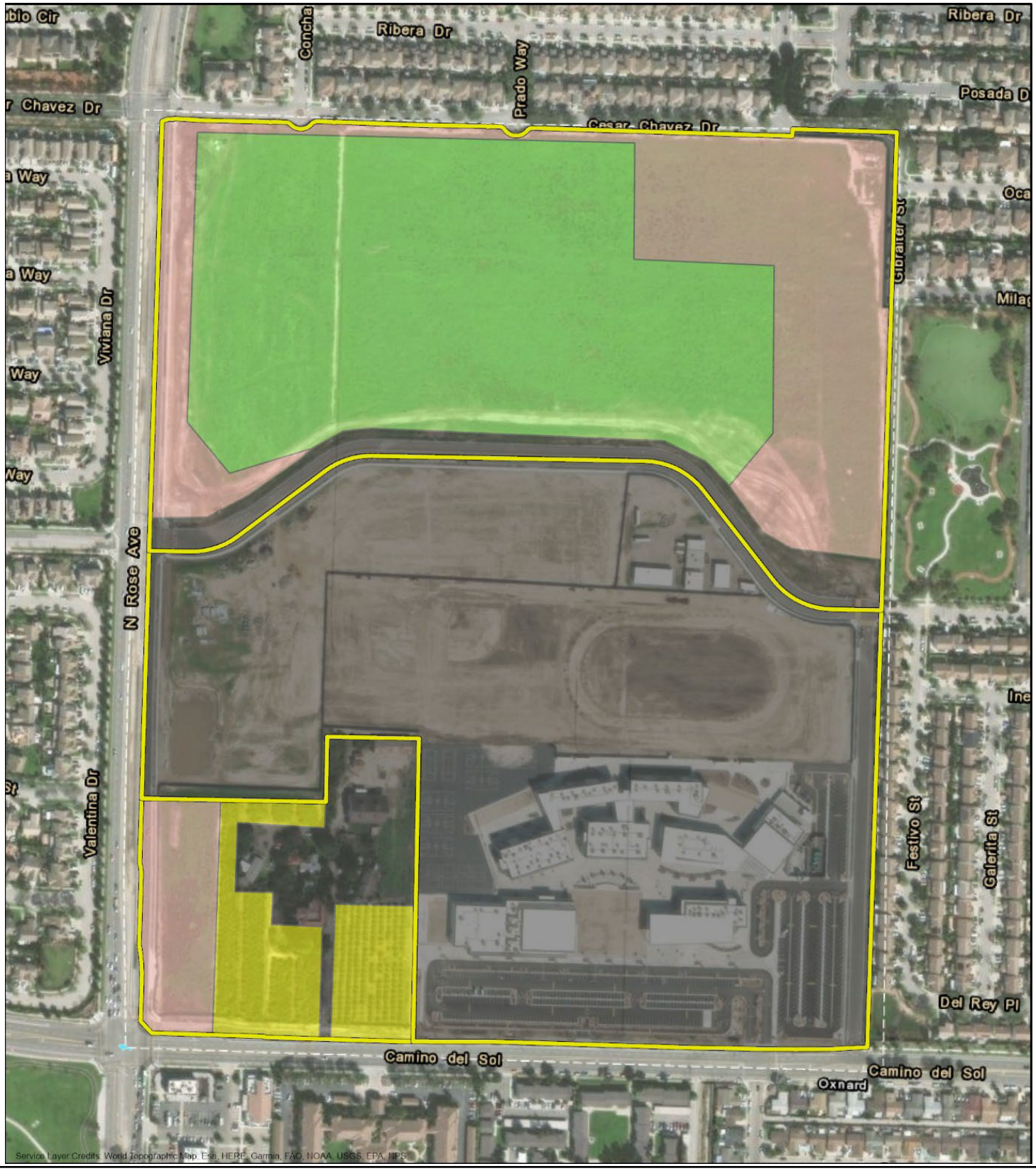
A majority of Area A, particularly in the central portion, is characterized by the dominance of coyote brush scrub (*Baccharis pilularis*). Other native species in this area include mulefat (*Baccharis salicifolia*) and arroyo willow (*Salix lasiolepis*). Dominant non-native species included short pod mustard (*Hirschfeldia incana*), black mustard (*Brassica nigra*), and tree tobacco (*Nicotiana glauca*). While this alliance is not considered sensitive, it does offer habitat for a variety of wildlife species providing shelter and nesting sites for birds, as well as a food source for insects and mammals. This land use category is not described in the Manual of California Vegetation[2] and is not a sensitive plant community.

Disturbed

This land use category was present in both Areas A and C and consists of sparsely vegetated or frequently disturbed native areas along roads and adjacent areas where bare ground is prevalent. It supports primarily non-native ruderal vegetation including short pod mustard (*Hirschfeldia incana*), black mustard (*Brassica nigra*), and tree tobacco (*Nicotiana glauca)*. Disturbed areas provide low quality habitat for wildlife. This land use category is not described in the Manual of California Vegetation and is not a sensitive plant community.

1 City of Oxnard. Municipal Code. Chapter 20, Trees and Shrubs. Accessed April 2026. https://codelibrary.amlegal.com/codes/oxnard/latest/oxnard_ca/0-0-0-83242.

2 California Native Plant Society. *Manual of California Vegetation*. Accessed October 2025. https://vegetation.cnps.org/.



Legend: Project Area | Coyote Brush Scrub | Developed | Disturbed | Fallowed Orchard

N

0 200 400 600

APPROXIMATE SCALE IN FEET

SOURCE: Pax Environmental, Inc. - 2025.

FIGURE **4.4-1**

Meridian Consultants

Vegetation Communities and Land Uses Within the Project Site

408-001-24

Developed

This land use category primarily consists of buildings, roadways, and pavement within the Project Site. Vegetation in these areas was generally sparse or absent except for ornamental plants and primarily non-native ruderal vegetation. Developed areas provide low quality habitat for wildlife. This land use category is not described in the Manual of California Vegetation and is not a sensitive plant community.

Fallowed Orchard

This land use category consists of a small lemon grove in Area C that were previously harvested but have not been actively cultivated or maintained since 2019. Orchards provide habitat for a variety of wildlife within and between fruit trees. Evergreen trees provide shelter and nesting habitat for avian species and shelter for mammals, many of which have adapted to orchard habitats. In addition, fruit blossoms and fruit provide a food source for insects, mammals, and birds. This land use category is not described in the Manual of California Vegetation and is not a sensitive plant community.

Wildlife

Habitat is present on the Project Site that is suitable for common wildlife species that frequent urban and agricultural areas. Small mammal burrows present within the Project Site were likely created by California ground squirrels (*Otospermopilus beecheyi*). These small mammal burrows are present within the fallow orchards and coyote brush scrub portions in Areas A and C and could be utilized by burrowing owls for overwintering. Two raptors were observed during the surveys. A red-tailed hawk (*Buteo jamaicensis*) was observed roosting and foraging on the east side of Area A, and a barn owl (*Tyto alba*) was observed roosting on a rafter inside a barn on the north side of Area C. One special-status species, California horned-lark (*Eremophila alpestris actia*), was observed on the east side of Area A. Five birds were observed foraging within an area recently disturbed by goats used for vegetation maintenance in Area A and not associated with agricultural use. A total of 38 wildlife species were observed during the surveys, 36 native (95%) and 2 non-native (5%).

Suitable habitat for bats and bat roosting is present within the trees and existing structures in Area C. No bats were observed during the surveys.

Surveys were conducted outside of the typical nesting bird season and no nesting was observed. However, suitable nesting bird habitat is present within the trees, shrubs, and on the ground located in Area C. Area A has suitable nesting habitat in trees, shrubs, orchards, buildings/structures, and on the ground.

There is no critical habitat for any federally listed wildlife within or surrounding the Project Site. A complete list of wildlife species observed during the survey is located in the Biological Assessment (**Appendix F**).

Habitat Connectivity and Wildlife Movement

Maintaining connectivity between areas of suitable habitat is critical for dispersal, migration, foraging, and genetic health of plant and wildlife species.[3] A functional network of connected habitat is essential to the continued existence of California's diverse species and natural communities in the face of both human land use and climate change.[4] The Project Site is completely surrounded by urban development and does not provide suitable connections between areas of habitat for wildlife movement.

Hydrology

The Project Site is within the southern area of the Santa Clara River floodplain. It does not contain any streams, wetlands, or other waters under jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), or California Department of Fish and Wildlife (CDFW). Common facultative wetland species including mulefat and arroyo willow were present in Area A, however; due to the site's historic and agriculture uses, and a lack of association with an established water feature, it does not qualify as a potential wetland or water feature. In addition, mulefat and arroyo willow are native, disturbance-adapted riparian species that readily establish in disturbed or frequently flooded areas.[5] These species were present in low abundance (< 1% relative abundance) and, while no ponding is present, these species are likely present due to greater water accumulation due to a road cut.

The nearest wetland or waters feature identified in the National Wetlands Inventory (NWI) database is the Rice Road Drain, located approximately 0.1 miles to the south of the Project Site, identified as a riverine feature. The Rice Road Ditch is a concrete lined channel which receives urban runoff from the surrounding area. It is located outside of the project boundaries, south of Camino del Sol, and would not be directly or indirectly impacted by project activities.

Special-Status Biological Resources

Table 4.4-2: Special-Status Species with the Potential to Occur below details the special-status species that have the potential to occur within the Project area based on literature and desktop review.

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3 U.S. Department of Agriculture. National Agroforestry Center. "Conservation Buffers: 2.3 Corridors and Connectivity." Accessed October 2025. https://www.fs.usda.gov/nac/buffers/guidelines/2_biodiversity/3.html.

4 California Natural Resources Agency. "Cali to Cali: California at COP16." 30x30 California. Accessed October 2025. https://www.californianature.ca.gov/pages/cali-to-cali-california-at-cop16.

5 Calflora. "Baccharis salicifolia (Mulefat)." Accessed October 2025. https://www.calflora.org/app/taxon?crn=1035; *see also* Calflora. "Salix lasiolepis (Arroyo Willow)." Accessed October 2025. https://www.calflora.org/app/taxon?crn=7277.

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR

Scientific Name	Common Name	Status	Habitat Type	Potential to Occur on or near the Site
			Plants	
Astragalus brauntonii	Braunton's milk-vetch	FE 1B.1	Coastal prairie grasslands, coastal sage scrub, and chaparral communities often found in disturbed areas in carbonate soils areas between 295 - 4,790 ft. Bloom period: Jan. - Aug.	**No:** The Project Site does not meet the species' habitat requirements due to a lack of suitable substrate. The nearest California Natural Diversity Database (CNDDB) record is over 9 miles from the Project Site.
Astragalus pycnostachyus var. lanosissimus	Ventura marsh milk-vetch	FE, SE, 1B.1	Coastal Salt Marsh, wetland-riparian less than 330 ft. elevation. Bloom period: July. - Oct.	**No:** The Project Site does not meet the species' habitat requirements due to a lack of wetland or riparian features. The nearest CNDDB record is over 4 miles from the Project Site.
Atriplex serenana var. *davidsonii*	Davidson's saltscale	1B.2	Coastal bluff scrub, coastal scrub in alkaline soil, less than 700 ft. elevation. Bloom period: Apr. - Oct.	**Low:** While suitable habitat of coastal bluff scrub is absent in the Project Site the nearest CNDDB is under 2 miles away.
Calochortus clavatus var. *gracilis*	slender mariposa-lily	1B.2	Foothill woodlands, chaparral, coastal scrub, valley and foothill grassland between 1,050 - 3,280 ft. elevation. Bloom period: Mar. - June.	**No:** The Project Site is outside of the known elevation range for the species with the nearest CNDDB record over 7 miles away.
Calochortus plummerae	Plummer's Mariposa-lily	4.2	Dry, rocky chaparral and yellow pine forests below 5,577 ft. elevation. Bloom period: May - Jul.	**No:** Suitable habitat of dry, rocky chaparral is absent within the Project Site with the nearest CNDDB record over 7 miles away.
Chaenactis glabriuscula var. orcuttiana	Orcutt's pincushion	1B.1	Coastal dunes and sandy bluff scrub at less than 329 ft. Bloom period: Apr. - July.	**No:** Suitable habitat of coastal dune and sandy bluff scrub is absent within the Project Site with the nearest CNDDB record over 6 miles away.
Chloropyron Maritimum ssp. *Maritimum*	salt marsh bird's-beak	FE, SE, 1B.2	Occurs in wetlands, salt-marsh, dunes, coastal, Coastal Strand, Coastal Salt Marsh, wetland-riparian. Coastal salt marsh, less than 30 ft. elevation. Bloom period: May - Oct.	**No:** Suitable habitat of salt-marsh, dunes, coastal strand, coastal salt marsh, and wetland features are absent from the Project Site. The nearest CNDDB record is over 4 miles away.
Dudleya blochmaniae ssp. *blochmaniae*	Blochman's dudleya	1B.1	Serpentine outcrops or shallow clay above serpentine in coastal scrub, valley/foothill grassland, and chaparral between 15 - 1,475 ft. elevation. Bloom period: May - June.	**No:** Suitable habitat with serpentine outcrops in coastal scrub is absent in the Project Site with the nearest CNDDB record over 6 miles away.
Dudleya parva	Conejo dudleya	FT, 1B.2	North facing volcanic cliffs and adjacent grasslands in coastal	**No:** Suitable habitat is not present, and the Project Site lacks suitable

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR

Scientific Name	Common Name	Status	Habitat Type	Potential to Occur on or near the Site
			sage scrub and valley grassland communities between 690 - 7,515 ft. elevation. Bloom period: May - June.	substrate with the nearest CNDDB record over 9 miles away.
Dudleya verityi	Verity's dudleya	FT, 1B.1	North facing volcanic outcrops between 196 - 394 ft. Bloom period: May - June.	**No:** The Project Site lacks suitable volcanic outcrops. The nearest CNDDB record is over 6 miles away.
Eriogonum crocatum	Conejo buckwheat	SR, 1B.2	Chaparral, coastal scrub, valley and foothill grassland on Conejo volcanic outcrops between 165 - 1,905 ft. elevation. Bloom period: Apr. - July.	**No:** The Project Site lacks suitable Conejo volcanic outcrops. The nearest CNDDB record is over 7 miles away.
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields	1B.1	Coastal salt marshes, playas, vernal pools between 0 - 4,515 ft. elevation. Bloom period: Feb. - July.	**Low:** Suitable habitat of coastal salt marshes, playas, and vernal pools are absent from the Project Site. The nearest CNDDB is over 4 miles away.
Malacothrix similis	Mexican malacothrix	2A	Coastal dunes less than 130 ft. elevation. Bloom period: Apr. - May.	**No:** This species is documented as extirpated in Ventura County. It was last seen in 1925 at Hueneme Beach in Ventura County.
Monardella sinuata ssp. *sinuata*	southern curly-leaved monardella	1B.2	Sandy soils in coastal dunes, coastal scrub, chaparral, cismontane woodland less than 1,000 ft. elevation. Bloom period: Apr. - Sep.	**No:** Suitable habitat of coastal dunes, coastal scrub, and chaparral cismontane woodland are absent from the Project Site. The nearest CNDDB is over 7 miles away.
Pseudognaphalium leucocephalum	white rabbit-tobacco	2B.2	Sandy or gravelly benches, dry stream bottoms, canyon bottoms less than 1,540 ft. elevation. Bloom period: Aug. - Nov.	**No:** Suitable habitat of dry stream and canyon bottoms with sandy and gravelly substrate is absent from the Project Site. The nearest CNDDB observation is over 2 miles from the Project Site.
Senecio aphanactis	chaparral ragwort	2B.2	Alkaline flats, dry open rocky areas. Northern Coastal Scrub, Coastal Sage Scrub, Foothill Woodland communities between 30 - 1,800 ft. elevation. Bloom period: Feb. - May.	**Low:** Suitable habitat of alkaline flats and dry rocky terrain is absent in the Project Site. The nearest CNDDB record is over 7 miles from the site and was recorded in 1962.
Suaeda esteroa	estuary seablite	1B.2	Coastal salt marshes less than 7 ft. elevation. Bloom period: May - Oct.	**No:** The Project Site is not within the elevation range for this species.
			Invertebrates	
Bombus crotchii	Crotch's bumble bee	SCE	Crotch's bumblebee is found in coastal California east towards	**Moderate:** The Project Site has suitable foraging habitat of flowering

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR				
Scientific Name	**Common Name**	**Status**	**Habitat Type**	**Potential to Occur on or near the Site**
			the Sierra-Cascade Crest and, less commonly, in western Nevada. It prefers open grasslands and scrub and nests underground. This species' food plants include Asclepias, Chaenactis, Lupinus, Medicago, Phacelia, and Salvia.	plants with nearby grasslands and scrub for breeding. This species was not observed during the survey and has not been documented in the area since 1982.
Danaus plexippus Plexippus pop.1	monarch – California overwinterin g population	FCE	Fields, roadside areas, open areas, wet areas or urban gardens where milkweed and flowering plants occur. Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	**Low:** The Project Site has suitable foraging habitat with host plants for breeding present. No host plant observed but transient individuals may occur.
			Fishes	
Catostomus santaanae	Santa Ana sucker	FT, SSC	Endemic to southern California and is native to only the Los Angeles, San Gabriel, Santa Ana, and Santa Clara River systems. Within the Los Padres National Forest, the Santa Ana Sucker is found within Piru Creek and Sespe Creek, both of which are tributaries to the Santa Clara River. Found in a variety of freshwater habitats, including streams, rivers, and creeks, particularly in areas with rocky or gravelly bottoms. They prefer clear, cool, and well-oxygenated water with a moderate current. They are often found in shallow riffles or pools with some vegetation or cover, such as submerged logs or overhanging vegetation.	**No:** The Project Site is outside of this species known geographic range.
Eucyclogobius newberryi	tidewater goby	FE, SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon in San Diego County north to the mouth of the Smith River.	**No:** The Project Site lacks the necessary water features for the species.

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR				
Scientific Name	**Common Name**	**Status**	**Habitat Type**	**Potential to Occur on or near the Site**
Gasterosteus aculeatus williamsoni	unarmored threespine stickleback	FE, SE, FP	Inhabits weedy pools, backwaters and emergent vegetation at the stream edge in small southern California streams.	**No:** The Project Site lacks the necessary water features for the species.
Gila orcutti	arroyo chub	SSC	Native streams from Malibu Creek to San Luis Rey River. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave and San Diego River basins.	**No:** The Project Site lacks the necessary water features for the species.
Oncorhynchus mykiss irideus pop. 9	steelhead - south-central California coast DPS	FE, SCE	Steelhead occupy freshwater streams or lakes during spawning and then migrate back through brackish water to the open ocean to live during their adult non-spawning phase of their life cycle. Steelhead spend most of the year in estuaries or open ocean and only return to fresh water to spawn.	**No:** The Project Site lacks the necessary water features for the species.
			Reptiles	
Anniella spp.	California legless lizard	SSC	Moist warm loose soil with plant cover. Moisture is essential, sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks. Leaf litter under trees and bushes in sunny areas and dunes stabilized with bush lupine and mock heather. Sometimes found in suburban gardens in southern California.	**Moderate:** The Project Site has suitable habitat present within the sandy soils on site. This species was not observed during the survey but has potential to occur during activities.
Anniella stebbinsi	Southern California legless lizard	SSC	Moist warm loose soil with plant cover. Moisture is essential, sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks. Leaf litter under trees and bushes in sunny areas and dunes stabilized with bush lupine and mock heather.	**Moderate:** The Project Site has suitable habitat present within the sandy soils on site. This species was not observed during the survey but has potential to occur during activities.

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR				
Scientific Name	**Common Name**	**Status**	**Habitat Type**	**Potential to Occur on or near the Site**
			Sometimes found in suburban gardens in southern California.	
Aspidoscelis tigris stejnegeri	coastal whiptail	SSC	Desert and semi-arid scrub, woodland and riparian areas with sparse vegetation	**Moderate:** Marginally suitable habitat for the species is present within the Project Site.
Actinemys marmorata	southwestern pond turtle	FP	They are found in rivers, lakes, streams, ponds, wetlands, vernal pools, ephemeral creeks, reservoirs, agricultural ditches, estuaries, and brackish waters. Western pond turtles prefer areas that provide cover from predators, such as vegetation and algae, as well as basking sites for thermoregulation.	**No:** The Project Site lacks the required wetland and riparian habitat for the species. This species was not observed during the surveys and is not likely to occur during construction activities. The nearest CNDDB record of the species is within 2.5 miles of the Project Site within a ponded area.
Phrynosoma blainvillii	coast horned lizard	SSC	Sandy substrate with scattered low bushes and abundant native ants and other insects.	**Low:** The Project Site has suitable habitat present within the sandy substrate and scattered coyote brush. This species was not observed during the survey and was last observed over 7 miles from the Project Site in a riparian floodplain.
Thamnophis hammondii	two-striped gartersnake	SSC	Riparian areas in coastal California from Salinas south to northwest Baja California less than 7,000 ft. elevation.	**No:** The Project Site lacks the required riparian habitat for the species. This species was not observed during the surveys and is not likely to occur during construction activities. The nearest CNDDB record of the species is over 6 miles from the Project Site.
Thamnophis sirtalis pop. 1	south coast gartersnake	SSC	Southern California coastal plain from Ventura County to San Diego County less than 2,800 ft. elevation.	**No:** The Project Site lacks the required riparian habitat for the species. This species was not observed during the surveys and is not likely to occur during construction activities. The nearest CNDDB record of the species is over 5 miles from the Project Site.
			Birds	
Agelaius tricolor	tricolored blackbird	ST, SSC, BCC	Open water with cattails or other protected nesting substrate within two miles of foraging habitat.	**No:** The Project Site lacks the required riparian habitat for the species. This species was not observed during the surveys and is not likely to occur during construction activities. The nearest

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR

Scientific Name	Common Name	Status	Habitat Type	Potential to Occur on or near the Site
				CNDDB record of the species is over 5 miles from the Project Site.
Athene cunicularia	burrowing owl	SSC, BCC	Open, dry annual or perennial grasslands and scrublands with low-growing vegetation.	**Moderate**: The Project Site has suitable foraging habitat present in the disturbed areas of the site. This species was not observed during the survey. There are known breeding populations at the Point Mugu Naval Air Station making the Project Site a plausible location for temporary roosting and foraging while migrating to their breeding ground. Suitable nesting and wintering habitat is present in small mammal burrows observed in the Project Site and there are known records within 3-miles.
Buteo regalis	ferruginous hawk	WL	Flat and rolling terrain in grassland or shrub steppe regions. Occurs in grassland, sagebrush, saltbush-greasewood shrubland, and the periphery of pinyon-juniper and other forest types. Sparse riparian forests and isolated trees and small groves of trees in grassland and shrub steppe areas are sought for nesting.	**No:** Suitable breeding and foraging habitat is not present in the Project Site with the nearest CNDDB record of the species over 6 miles from the site recorded in 2002.
Charadrius nivosus nivosus	western snowy plover	FT, SSC	Sandy beaches, salt pond levees and shores of large alkali lakes with sandy or gravelly soils for nesting.	**No:** The Project Site does not meet the suitable foraging or breeding habitat requirements of salt pond levees and alkali lakes. This species was not observed during the survey and would not be expected within the Project Site during activities
Coccyzus americanus occidentalis	western yellow-billed cuckoo	FT, SE	Riparian forests, often mixed willow/cottonwood, along large river systems with an understory of blackberry, nettle and or grape.	**No:** The Project Site does not meet the suitable foraging or breeding habitat requirements of wooded riparian river systems with a blackberry and nettle understory. This species is noted as extirpated in most of Ventura County with no records of occurrence in Port Hueneme since 1977.
Elanus leucurus	white-tailed kite	FP	Rolling foothills and valley margins with scattered oaks &	**Low:** The Project Site has low quality foraging habitat present with the

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR

Scientific Name	Common Name	Status	Habitat Type	Potential to Occur on or near the Site
			river bottomlands or marshes next to deciduous woodland.	presence of ground squirrel burrows and nearby marshes and creeks within 4 miles of the Project Site. The Project Site lacks suitable breeding habitat. There is a record of an occurrence in nearby lagoons and marshes in 2010 over 6 miles from the Project Site. This species was not observed during the survey and is not expected to occur during construction activities but has potential to fly over as a transient or temporary foraging.
Empidonax traillii extimus	southwestern willow flycatcher	FE, SE	Migrates widely throughout California and is detected in a variety of wetland and upland habitats. It breeds in dense riparian habitats along rivers, streams, or other wetlands. Vegetation can be dominated by dense growths of willows (Salix sp.), mulefat (Baccharis sp.), or other shrubs and medium-sized trees. Nesting habitat may also have an overstory of cottonwood (Populus sp.), tamarisk (Tamarix sp.), or other trees.	**No:** The Project Site does not meet the suitable foraging or breeding habitat requirements of dense riparian habitats along rivers, streams, or other wetlands. The nearest CNDDB record of the species is over 9 miles from the Project Site.
Eremophila alpestris actia	California horned lark	WL	Grassland, tundra, sandy regions, areas with scattered low shrubs, desert playas, grazed pastures, stubble fields, open cultivated areas, and rarely open areas in forest. Nests in hollow on ground often next to grass tuft or clod of earth or manure.	**Present:** Suitable nesting and foraging habitat is present within the Project Site particularly in the coyote brush scrub community. One (1) individual observed during the preconstruction survey in Area.
Falco peregrinus anatum	American peregrine falcon	FD, SD	Broad array of habitats, including urban.	**Low:** While the Project Site lacks suitable breeding habitat, there is potential for the species to fly over the work area as a transient or roost while foraging.
Laterallus jamaicensis coturniculus	California black rail	ST, FP	Marshes and meadows. Nest in the higher, drier parts of marshes, where tidal activity is least and where different types of grasses, sedges, and rushes occur in mosaic-like patches. Away from tidal habitats, nest in	**No:** Suitable breeding and foraging habitat is not present within the Project Site due to the lack of water features on site. The only CNDDB record for the species is over 4 miles from the site recorded in 1936.

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR				
Scientific Name	**Common Name**	**Status**	**Habitat Type**	**Potential to Occur on or near the Site**
			a variety of wet meadows, marsh edges (including along creeks and rivers), around farm ponds, and even in hayfields with standing water.	
Passerculus sandwichensis beldingi	Belding's savannah sparrow	BCC	Salt marshes, herbaceous wetland. Nests on the ground in natural depression or scrape, primarily in pickleweed habitat at the higher levels of the marsh, above the reach of the highest spring tides.	**No:** Suitable breeding and foraging habitat is not present within the Project Site due to the lack of water features on site. The nearest CNDDB record for the species is over 4 miles from the site recorded in 2007.
Pelecanus occidentalis californicus	brown pelican	FD, SD	Found strictly along the coast. Rocky, sandy or vegetated offshore islands, beaches, open sea (for feeding), harbors, marinas, estuaries, and breakwaters.	**No:** The Project Site lacks foraging and breeding habitat, which occurs over open seas and beaches. This species is commonly observed in nearby lagoons and estuaries where some foraging occurs. This species was not observed during the survey and would not be expected within the Project Site during construction activities.
Polioptila californica californica	coastal California gnatcatcher	FT, SSC	Low, coastal sage on mesas and slopes below 2,500 ft elevation.	**No:** The Project Site does not meet the foraging and breeding habitat requirements of coastal sage scrub. This species has been observed to the east along the toe slopes of the Santa Monica Mountains. This species was not observed during the survey and would not be expected within the Project Site during activities.
Rallus obsoletus levipes	light-footed Ridgway's rail	FE, SE, FP	Cordgrass-pickleweed saltmarsh habitat. Nests under clumps of pickleweed, on ground or in cordgrass slightly above ground level.	**No:** The Project Site does not have suitable foraging or breeding habitat of coastal pickleweed communities. This species was not observed during the survey and would not be expected within the Project Site.
Riparia riparia	bank swallow	ST	Vertical banks, cliffs, and bluffs in alluvial, friable soils. Lowland areas along ocean coasts, rivers, streams, lakes, reservoirs, and wetlands.	**No:** The Project Site lacks suitable foraging habitat such as coastal streams and lacks vertical banks and cliffs for breeding. This species was not observed during the survey and is possibly extirpated. This species would not be expected

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR

Scientific Name	Common Name	Status	Habitat Type	Potential to Occur on or near the Site
				within the Project Site during construction activities.
Setophaga petechia	yellow warbler	SSC	Riparian vegetation among cottonwood, sycamore, ash, or alder near water or montane scrub of Cascade and Sierra Nevada ranges.	**No:** Suitable breeding and foraging habitat is not present within the Project Site due to the lack of water features on site. The nearest CNDDB record for the species is over 2 miles from the site and recorded in 2018 along the Santa Clara river.
Sternula antillarum browni	California least tern	FE, SE, FP	Beaches, lakes, bays. Forages over open water.	**No:** Suitable breeding and foraging habitat is not present within the Project Site due to the lack of water features on site. The nearest CNDDB record for the species is over 5 miles from the site and recorded in 2017 at Ormond Beach.
Vireo bellii pusillus	least Bell's vireo	FE, SE	Willow, baccharis, mesquite in low riparian in vicinity of water or dry river bottoms below 2,000 ft. elevation.	**No:** Suitable breeding and foraging habitat is not present within the Project Site due to the lack of water features on site. The nearest CNDDB record for the species is over 2 miles from the site and recorded in 2014 along the Santa Clara River.
			Mammals	
Antrozous pallidus	pallid bat	SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting.	**Moderate:** The Project Site has suitable foraging and roosting, and additional roosting habitat present on nearby bridges, within open structures such as the barn on site, tree cavities or crevices found in areas adjacent to the Project Site. The last record of occurrence was documented in 2006 over 7 miles from the Project Site.
Choeronycteris mexicana	Mexican long-tongued bat	SSC	Roosts in relatively well-lit caves and in and around buildings in habitats with blooming succulents.	**Low:** The Project Site has low quality roosting habitat for the species in the abandoned barn structure, as well as in buildings surrounding the site. Foraging is not expected as the Project Site lacks the appropriate vegetation for the species. There is only 1 recorded CNDDB record of the species in the Ventura area over 8 miles from the Project Site.

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR

Scientific Name	Common Name	Status	Habitat Type	Potential to Occur on or near the Site
Microtus californicus stephensi	south coast marsh vole	SSC	Coastal marshes in Orange, Los Angeles, and Ventura counties in California.	**No:** Suitable breeding and foraging habitat is not present within the Project Site due to the lack of water features on site. The nearest CNDDB record for the species is over 6 miles from the site and recorded within the Point Mugu salt marsh.
Sorex ornatus salicornicus	southern California saltmarsh shrew	SSC	Confined to coastal salt marshes in Los Angeles, Orange and Ventura counties. Salt marshes dominated by Salicornia virginica and associated with dense willow (*Salix spp*.) and bulrush (*Scirpus sp*.).	**No:** Suitable breeding and foraging habitat is not present within the Project Site due to the lack of water features on site. The nearest CNDDB record for the species is over 6 miles from the site and recorded within the Point Mugu salt marsh.
Taxidea taxus	American badger	SSC	Drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	**Low:** The Project Site has low quality habitat for the species within the shrub vegetation, but it unlikely to occur on site due to the developed nature of the surrounding area. The site also provides suitable foraging habitat for the species with the presence of ground squirrels. The nearest recorded CNDDB observation of the species is over 5 miles from the Project Site and recorded in 2009.

TABLE 4.4-2: SPECIAL-STATUS SPECIES WITH THE POTENTIAL TO OCCUR

Scientific Name	Common Name	Status	Habitat Type	Potential to Occur on or near the Site

Notes:
Status Definitions

USFWS
FE: Species designated as endangered under the federal Endangered Species Act. Endangered = "any species in danger of extinction throughout all or a significant portion of its range."
FPE: Proposed for federal listing as Endangered.
FC: Candidate for federal listing as Threatened or Endangered.
FT: Species designated as Threatened under the Federal Endangered Species Act = "species likely to become an Endangered species within the foreseeable future throughout all or a significant portion of its range."
FPT: Proposed for federal listing as Threatened.
BCC: Bird of Conservation Concern

CDFW
SE: Endangered = "a species is Endangered when its prospects of survival and reproduction are in immediate jeopardy from one or more causes" and is officially listed as such under the California Endangered Species Act (CESA).
SR: State-listed as Rare = "taxa that are biologically rare, very restricted in distribution, or declining throughout their range but not currently threatened with extirpation" (Special Status Vascular Plants, Bryophytes, and Lichens List).
SSC: Species of Special Concern
ST: Threatened = "a species that, although not presently threatened with extinction, is likely to become an Endangered species in the foreseeable future in the absence of the special protection and management efforts required by this Act" (CESA).
SC: State candidate for listing as threatened or endangered.
WL: Watch List.

CRPR – California Rare Plant Ranking
1A: Plant presumed extinct in California
2A: Plants presumed extirpated in California, but more common elsewhere
.1: Seriously threatened in California
.2: Fairly threatened in California
.3: Not very threatened in California
.4: Watch list for plants that are of limited distribution
1B: Plants Rare, Threatened, or Endangered in California and elsewhere
2B: Plants Rare, Threatened, or Endangered in California, but more common elsewhere

Potential to Occur in the Project Site
No: Species not observed. The Project Site does not meet the species habitat requirements.
Low: Species not observed, marginal habitat is present and/or the species could occur temporarily.
Moderate: Species not observed, suitable habitat is present, and the species is common in the area or could occur from time to time.
High: Species not observed, suitable habitat is present, and the species could occur there frequently.
Present: Species were observed or are known to occur with recent records in the area.

Source: PAX Environmental, Inc., *Biological Resources Assessment*, August 2025 (**Appendix F**).

4.4.2 Regulatory Framework

Federal

Migratory Bird Treaty Act of 1918

The Migratory Bird Treaty Act[6] makes it unlawful to "take" (kill, harm, harass, etc.) any migratory bird, including their nests, eggs, or products. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many other species that may utilize natural and artificial habitats throughout the area.

Federal Endangered Species Act of 1973 (ESA)

Section 3 of the ESA[7] defines an endangered species as any species or subspecies "in danger of extinction throughout all or a significant portion of its range." A threatened species is defined as any species or subspecies of fish, wildlife, or plant "likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Threatened or endangered species and associated critical habitat are designated through publication of a final rule in the Federal Register. Designated endangered and threatened animal species are fully protected from "take" unless an applicant has an incidental take permit issued by the United States Fish and Wildlife Service ("USFWS") under Section 10 or incidental take statement issued under Section 7 of the ESA. Take is defined as the killing, capturing, or harassing of a species. Proposed endangered or threatened species include those species for which a proposed regulation has been published in the Federal Register, but a final ruling has not been made.

Clean Water Act (CWA)

The CWA[8] regulates discharges into waters of the United States.

"Waters of the United States" means:

(1) Jurisdictional waters. For purposes of the Clean Water Act, 33 U.S.C. 1251 et seq. and its implementing regulations, subject to the exclusions in paragraph (2) of this section, the term "waters of the United States" means:

   (i) The territorial seas, and waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including waters which are subject to the ebb and flow of the tide;

   (ii) Tributaries;

   (iii) Lakes and ponds, and impoundments of jurisdictional waters; and

   (iv) Adjacent wetlands.

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6 United States Code. Title 16. Section 703 et seq.

7 United States Code. Title 16. Section 1531 et seq.

8 United States Code. Title 33. Section 1251 et seq.

(2) Non-jurisdictional waters. The following are not "waters of the United States":

(i) Waters or water features that are not identified in paragraph (1)(i), (ii), (iii), or (iv) of this definition;

(ii) Groundwater, including groundwater drained through subsurface drainage systems;

(iii) Ephemeral features, including ephemeral streams, swales, gullies, rills, and pools;

(iv) Diffuse stormwater run-off and directional sheet flow over upland;

(v) Ditches that are not waters identified in paragraph (1)(i) or (ii) of this definition, and those portions of ditches constructed in waters identified in paragraph (1)(iv) of this definition that do not satisfy the conditions of paragraph (3)(i) of this definition;

(vi) Prior converted cropland;

(vii) Artificially irrigated areas, including fields flooded for agricultural production, that would revert to upland should application of irrigation water to that area cease;

(viii) Artificial lakes and ponds, including water storage reservoirs and farm, irrigation, stock watering, and log cleaning ponds, constructed or excavated in upland or in non-jurisdictional waters, so long as those artificial lakes and ponds are not impoundments of jurisdictional waters that meet the conditions of paragraph (3)(vi) of this definition;

(ix) Water-filled depressions constructed or excavated in upland or in non-jurisdictional waters incidental to mining or construction activity, and pits excavated in upland or in non-jurisdictional waters for the purpose of obtaining fill, sand, or gravel;

(x) Stormwater control features constructed or excavated in upland or in non-jurisdictional waters to convey, treat, infiltrate, or store stormwater run-off;

(xi) Groundwater recharge, water reuse, and wastewater recycling structures, including detention, retention, and infiltration basins and ponds, constructed or excavated in upland or in non-jurisdictional waters; and

(xii) Waste treatment systems.[9]

USACE jurisdiction in non-tidal waters typically extends to the Ordinary High-Water Mark ("OHWM"). The OHWM for intermittent streams, for example, can be determined by the fluctuations of water as indicated by physical characteristics such as clear, natural lines impressed on a water bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.[10]

In 2006, the U.S. Supreme Court revisited the issue of jurisdictional scope of Section 404 of the CWA. In *Rapanos vs. United States* (2006) 547 U.S. 715, the court ruled that waters of the United States are subject to CWA jurisdiction if the water body: (1) is relatively permanent or seasonal, (typically three months or more); (2) is a wetland that directly abuts a relatively permanent water body; or (3) if the

9 Code of Federal Regulations. Title 40. Section 120.2. 2025.

10 Code of Federal Regulations. Title 33. Section 328.3(e).

water body and its adjacent wetland has a significant physical, biological, or chemical nexus with a traditionally navigable waterway.

Most impacts to areas delineated as waters of the United States, if determined to be jurisdictional by the USACE, require approval under the authority of the CWA and its implementing regulations.

Section 401

Section 401 of the CWA authorizes the State of California to certify that federal permits, including USACE Section 404 permits, and licenses do not violate the State's water quality standards.[11] The State's implementing regulations to conduct certifications are codified under the California Code of Regulations Title 23, "Waters," Sections 3830 – 3869. Projects qualifying for a USACE Section 404 permit must submit materials for review to the appropriate RWQCB and request a Section 401 certification. Much of the same information (project description, potential impacts, and mitigation measures) necessary to apply for USACE Section 404 and CDFG Section 1602 permits is required for the Section 401 certification.

In response to certain federal court decisions that limited USACE jurisdiction, the state issued several directives to the regional boards regarding the regulation of isolated waters no longer regulated by the USACE.[12] At present, the State Water Quality Control Board and the RWQCBs are to:

- continue issuing Section 401 certifications for federal permits[13]; and
- issue Waste Discharge Requirements ("WDRs") for dredge or fill discharges to waters deemed by the USACE as not subject to federal jurisdiction referencing the same regulatory considerations that are used to issue general WDRs.[14]

A Section 401 certification and a WDR application may be made on the same form, but the State Board has issued a model letter to be submitted with the WDR application to clarify that the WDRs

11 United States Code. Title 33. Section 1341(a)(1) and (d). 2025.

12 State Water Resources Control Board. "Clean Water Act Section 401 – Certification and Wetlands Program: Wetland Riparian Area Protection Policy." Accessed April 2026. https://www.waterboards.ca.gov/water_issues/programs/cwa401/wrapp.html.

13 State Water Resources Control Board. *Water Quality Order No. 2003-0017-DWQ: Statewide General Waste Discharge Requirements for Dredged or Fill Discharges that Have Received State Water Quality Certification*. November 19, 2003. https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/generalorders/go_wdr401regulated_projects.pdf.

14 State Water Resources Control Board. *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. April 2, 2019 (effective May 28, 2020). https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/2021/procedures.pdf.

are intended to cover "waters of the State" not covered by the Section 401 certification and not subject to the USACE regulations.[15]

Section 404

The CWA was passed in 1972 and regulates discharges into waters of the United States. Section 404 of the CWA regulates activities including discharge of dredged or fill materials into waters of the United States.

The discharge of fill material into an area delineated as waters of the United States, including wetlands, that is determined to be under the USACE jurisdiction, requires a permit or other approval by the USACE Regulatory Branch.[16] Under EPA/Corps regulations, "fill material" means material placed in waters of the United States that has the effect of (i) replacing any portion of a water with dry land or (ii) changing the bottom elevation; examples include rock, sand, soil, clay, plastics, construction debris, wood chips, and materials used to create structures or infrastructure, but not trash or garbage.[17] This includes most materials (e.g., rock, soil, pilings, concrete, wood, some incidental fallback of soil from earth-moving equipment, and in some cases additional water) that can be discharged into a water or wetland.

Most Section 404 permits require mitigation for reducing overall impacts to wetlands, including waters of the United States and their functions.

Federal Rivers and Harbors Act

Federal regulations of "waters of the United States" stem from Section 10 of the Federal Rivers and Harbors Act of 1899,[18] enacted to regulate activities within navigable waters. Under Section 10 of the Act, it is unlawful to build any wharf, pier, jetty, or other structure in or over navigable waters—or to excavate or fill or otherwise alter such waters—unless the work is on plans recommended by the Chief of Engineers and authorized by the Secretary of the Army; the statute also prohibits creating any obstruction to the navigable capacity of U.S. waters unless affirmatively authorized by Congress.[19] Primary concerns of this Act include contamination of sediments associated with dredge or fill projects in navigable waters.

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15 State Water Resources Control Board. "Statewide Application for Discharges of Dredged or Fill Material to Waters of the State." Accessed October 2025. https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/wqcapppdf.pdf.

16 Code of Federal Regulations. Title 33. Section 323.3(a). 2025.

17 Code of Federal Regulations. Title 40. Section 232.2. 2025; s*ee also* Code of Federal Regulations. Title 33. Section 323.2(e)–(f). 2025.

18 United States Code. Title 33. Section 403; s*ee also* United States. Rivers and Harbors Act of 1899. Chapter 425, 30 Stat. 1151.

19 United States Code. Title 33. Section 403. 2025; *see also* Code of Federal Regulations. Title 33. Part 322. 2025.

State

California Endangered Species Act ("CESA")

The CESA[20] generally parallels the main provisions of the federal Endangered Species Act and is administered by the CDFW. The CESA ensures that deserving plant or animal species will be given protection by the state based on their ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people of the state. The CESA establishes state policy to conserve, protect, restore, and enhance endangered species and their habitats. Under state law, plant and animal species may be formally designated as rare, threatened, or endangered through official listing by the California Fish and Wildlife Commission. Listed species are provided greater protection during the land use planning process by local governments, public agencies, and landowners than are species that have not been listed.

On private property, endangered plants may also be protected by the Native Plant Protection Act of 1977 ("NPPA").[21] State-listed threatened plants are protected by the CESA, and state-listed rare plants are protected by the NPPA. If an applicant obtains a federal take statement pursuant to Section 7 or an incidental take permit pursuant to Section 10 for a species listed under both the ESA and CESA, and CDFW issues a consistency determination, no further CESA authorization is required for the take.[22]In addition, the California Environmental Quality Act (CEQA) requires disclosure of any potential impacts on listed species and alternatives or mitigation that would reduce those impacts.

California Fish and Game Code

Section 1602-1605

The State of California regulates water resources under Sections 1600–1605 of the Fish and Game Code of California.[23] It is unlawful for any person to divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream or lake designated by the department, or use any material from the streambeds, without first notifying the CDFW of that activity.

The CDFW considers most natural drainages to be streambeds unless it can be demonstrated otherwise. Streams are defined in the California Code of Regulations as follows:[24]

> *A stream is a body of water that flows at least periodically or intermittently through a bed or channel having banks and that supports fish or other aquatic life. This includes*

20 California Fish and Game Code. Section 2050 et seq.

21 California Fish and Game Code. Sections 1900–1913. 2025.

22 California Fish and Game Code. Section 2080.1. 2025.

23 California Fish and Game Code. Sections 1600-1605.

24 California Code of Regulations. Title 14. Chapter 1. Section 1.72.

> *watercourses having surface or subsurface flow that supports or has supported riparian vegetation*.

The CDFW jurisdiction under Section 1602 includes ephemeral, intermittent, and perennial watercourses, and is often extended to the limit of riparian habitats that are located contiguous to the water resource and that function as part of the watercourse system. The California Fish and Game Code states:[25]

> *Riparian habitat means lands that contain habitat that grows close to and which depends on soil moisture from a nearby freshwater source*.

Any project that impacts CDFW jurisdictional areas, including fills, vegetation removal, or bridging, requires a Section 1602 Streambed Alteration Agreement from the CDFW. Much of the same information (i.e., project description, potential impacts, mitigation measures, etc.) necessary to apply for USACE Section 404 permits is also required in the Streambed Alteration Agreement application.

Sections 3503, 3503.5, and 3800

The California Fish and Game Code[26] also prohibits the destruction of bird nests and eggs[27] , and the "take" of birds of prey[28] and nongame birds.[29] Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered "take." Such "take" would also violate federal law protecting migratory birds.

Incidental take permits (i.e., Management Agreements) are required from the CDFW for projects that may result in the incidental take of species listed by the State of California as endangered, threatened, or candidate species. The permits require that impacts to protected species be minimized to the extent possible and mitigated to a level of insignificance.

California Environmental Quality Act—Treatment of Listed Plant and Animal Species

The ESA and CESA protect only those species formally listed as endangered or threatened (or rare in the case of the state list); under CESA, candidate species are also afforded the same legal protections as listed threatened species. CEQA Guidelines Section 15380 independently define "endangered" species of plants or animals as those whose survival and reproduction in the wild are in immediate jeopardy, "threatened" species as those likely to become endangered in the

25 California Fish and Game Code. Section 2785(e).

26 California Fish and Game Code. Section 3503. 2025.

27 California Fish and Game Code. Section 3503.5. 2025.

28 California Fish and Game Code. Section 3503.5. 2025.

29 California Fish and Game Code. Section 3800. 2025.

foreseeable future in the absence of special protection, and "rare" species as those in such low numbers that they could become endangered if their environment worsens. Therefore, a project normally will have a significant effect on the environment if it will substantially effect endangered, threatened, or rare species of animal or plant, or the species' habitat. The significance of impacts to a species under CEQA must be based on analyzing the actual threat of extinction, likelihood of becoming endangered, or rarity of the species or habitat, regardless of legal status.

Local

City of Oxnard General Plan

The City's 2030 General Plan contains goals and policies to guide decision making in the City for day-today and long-term strategic planning and operations in the City. The following City of Oxnard General Plan policies and goals, in Chapter 5: Environmental Resources, are applicable to the proposed Project.

Natural and Cultural Resources

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

Policy ER-1.1: ***Protect Oxnard's Natural and Cultural Resources.***

Protect the City's natural resource areas, fish and wildlife habitat, scenic areas, open space areas, parks, and cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible.

Biological and Ecological Habitats

Goal ER-2: Maintenance and enhancement of natural resources and open space.

Policy ER-2.4: ***Design Review Process.***

Use the environmental and design review process to protect designated sensitive habitat, and promote open space.

Water Habitats

Goal ER-3: Protected, restored, and enhanced of water-related habitats and their associated plant and wildlife species.

Policy ER-3.2: ***Review of Development Proposals.***

Review development proposals in accordance with applicable Federal, State, and local statutes protecting

special-status species and jurisdictional wetlands and be open to requiring greater protection.

Policy ER-3.3: ***Request Mitigation Measures from Other Agencies.***

Whenever possible, request appropriate feasible County, State, and Federal agency mitigation measures.

Policy ER-3.5: ***Reduce Construction Silt and Sediment.***

Require that construction-related silt and sediment be minimized or prohibited to minimize temporary impacts on biological resources.

Sensitive Habitat Areas

Goal ER-4: Protected, restored, and enhanced sensitive habitat areas.

Policy ER-4.1: ***Encourage Protection of Sensitive Habitat.***

Identify and encourage protection of sensitive habitat areas, with attention to habitat that may span small parcels.

Policy ER-4.2: ***Limiting Activities in Sensitive Areas.***

Limit the recreational activities in open space areas with sensitive habitats to those activities that have minimal impact.

Policy ER-4.4: ***Loss of Sensitive Habitats.***

Consider loss of sensitive habitats due to development to be a significant environmental impact. All development that is proposed to disturb or remove sensitive habitat shall demonstrate appropriate feasible mitigation.

Policy ER-4.5: ***Planning in Sensitive Areas.***

Require careful planning of new development in or near areas that are known to have particular value for biological resources to maintain sensitive vegetation and wildlife habitat.

4.4.3 Significance Thresholds

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations

adopted by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

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

e. Would the project conflict with any local policies or ordinances protecting biological resources?

4.4.4 Methodology

A Biological Resources Assessment (**Appendix F**) prepared for the Project Site by Pax Environmental, Inc. (Pax), included literature and desktop review of information and records from the City of Oxnard 2030 General Plan, City of Oxnard CEQA Significance Threshold Guidelines, California Natural Diversity Database , the California Native Plant Society Inventory of Rare and Endangered Vascular Plants of California, USFWS Threatened and Endangered Species Active Critical Habitat Report, U.S. Fish and Wildlife Service National Wetlands Inventory, Consortium of California Herbaria, U.S. Geological Survey topographic maps, U.S. Geological Survey National Hydrography Dataset, U.S. Geological Survey topographic maps, and Natural Resource Conservation Service soils information. The records search was performed using a 10-mile radius around the Project Site, in all eight cardinal directions.

Reconnaissance-level surveys of the Project Site were conducted by Pax staff in October 2024 to document existing biological conditions of the Project Site, including hydrological features, and special-status species habitat to determine their potential to occur. The Biological Assessment includes the findings of the surveys including maps showing vegetation communities and other biological resources, an analysis of special-status species and their potential to occur, an inventory of observed plants and wildlife, and representative photos.

Impact to biological resources are assessed at different scales including short term versus long term and direct versus indirect. Short-term impacts are typically temporary and reversible while long term impacts become apparent later in time (i.e., after the Project is completed). Direct impacts are generated directly from the Project within the Project Site at the same time as construction of the Project. Examples of types of conceivable long-term direct impacts due to the grading phase of the Project include direct mortality of wildlife, habitat loss, and displacement. Indirect impacts caused by the Project are impacts at a location outside the Project Site. Short term indirect impacts include increased noise and light pollution during construction which can affect breeding, foraging, and migration of species. In addition, runoff due to erosion and sedimentation may affect water quality for terrestrial or aquatic species. Long term indirect impacts from the project could include the spreading of invasive species and increased human access to nearby open space areas.

4.4.5 Project Impacts

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status

species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated.

The Biological Assessment determined that because the Project Site is both surrounded by urban development and was historically used for agriculture, there is low to no potential for most special-status species to occur within the Project Site. Three special-status plant species, including Davidson's saltscale, Coulter's goldfields and Chaparral ragwort, were identified during the literature review as having a low potential to occur in the area. No special-status plant species were observed in the Project Site during the survey. However, special-status wildlife species and nesting/roosting birds and bats could potentially have direct and indirect impacts through removal of their habitat(s).

One special-status wildlife species, California horned lark, was observed within the Project Site during the field surveys. The Project could have direct and indirect impacts on California horned lark through the disturbance of any active California horned lark present on the Project Site. However, with implementation of mitigation measure (**MM**) **BIO-1**, which would require pre-construction surveys and monitoring for nesting raptors and migratory birds, potential impacts to California horned lark nests would be reduced to less than significant.

The burrowing owl (*Athene cunicularia*), another special-status wildlife species, has a moderate potential to nest and overwinter[30] in the Project Site. No burrowing owls or sign of the species were observed during surveys. However, suitable nesting and wintering habitat is present within the fallow orchards and coyote brush scrub areas of the Project Site, where small mammal burrows occur. Additionally, there are known occurrences within three miles of the Project Site. With the implementation of **MM BIO-1** and **MM BIO-2**, which would require pre-construction surveys and monitoring of nesting raptors, migratory birds and burrowing owls, potential impacts to burrowing owls would be reduced to less than significant.

The Project Site contains suitable nesting habitat for roosting bats, including maternity colonies, particularly in the trees and buildings located in Area C. No bats, roosting or foraging, were observed in the Project Area during the field survey. The Project could have direct and indirect impacts on roosting bats through the disturbance of roosting bats with active roosts, including maternity roosts. However, with implementation of **MM BIO-3**, which would require pre-construction surveys and monitoring for roosting bats, potential impacts to roosting bats nests would be reduced to less than significant.

The Project Site contains suitable nesting habitat for various bird species. Suitable nesting habitat on site includes the ground, shrubs, trees, and existing structures. No nests or nesting activity were observed in the Project Site during the field survey, but the survey was conducted outside of the

30 To spend or survive through the winter season in a particular location, typically for resting or foraging rather than breeding.

typical nesting bird season (February 1 to August 31). The Project could have direct and indirect impacts on nesting birds through the removal of nesting habitat or disturbance of birds with active nests. With implementation of **MM BIO-1,** potential impacts to active nests would be reduced to less than significant.

Crotch's bumble bee (*Bombus crotchii*) has a moderate potential to occur within the Project Site due to the presence of suitable foraging habitat (flowering plants) and potential nesting habitat within small mammal burrows and vegetated areas. Although the species was not observed during surveys, there are recent records within the Oxnard area. Project construction activities could result in direct impacts to individuals or nesting habitat. However, with implementation of **MM BIO-4**, which requires protocol-level pre-construction surveys and avoidance measures if the species is detected, potential impacts to Crotch's bumble bee would be reduced to less than significant.

Additionally, several special-status reptile species, including California legless lizard (*Anniella spp*.), Southern California legless lizard (*Anniella stebbinsi*), and coastal whiptail (*Aspidoscelis tigris stejnegeri*), have a moderate potential to occur within the Project Site due to the presence of suitable sandy soils and vegetated habitat. Although these species were not observed during surveys, construction-related ground disturbance could result in direct impacts to individuals. However, with implementation of **MM BIO-5**, which requires pre-construction clearance surveys and relocation of individuals by a qualified biologist, potential impacts to special-status reptiles would be reduced to less than significant.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations adopted by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less than Significant Impact

The Biological Assessment concluded the Project Site consists of vegetation communities and land uses that are not sensitive natural communities. The Project Site does not contain streams, wetlands, or other waters under the jurisdiction of the USACE, RWQCB, or CDFW. Facultative wetland species, such as mulefat and arroyo willow, were observed in Area A. However, due to the historical use of Area A for agriculture and its lack of connection to an established water feature, it does not qualify as a potential wetland or water feature.

While the Project Site does not contain any potential wetland or waters features, the Rice Road Drain is located approximately 0.1 mile south of the Project Site and documented as a riverine feature in the NWI database. The Rice Road Ditch is a concrete lined channel which receives urban runoff from the surrounding area. Construction and operation of the Project could potentially result in indirect erosion, siltation, and water quality impacts to Rice Road Drain. However, as detailed in **Section 4.10**: **Hydrology and Water Quality**, the proposed Project would require the development of Storm Water Pollution Prevention Program and incorporate Best Management Practices that would ensure

that erosion, siltation and water quality impacts associated with the Project would be reduced to less than significant. For these reasons, the Project would have less a than significant impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations adopted by the CDFW or USFWS.

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

No Impact

Habitat linkages are broadly defined as areas of landscape that facilitate ecological connectivity between habitat patches, allowing for the movement of wildlife, genetic exchange, and access to seasonal resources. Habitat linkages are not necessarily "vacant" lands and are not defined by the absence of development, but rather by their functional role in maintaining landscape connectivity. Wildlife corridors are a specific type of habitat linkage and are typically defined as linear landscape features of sufficient width and suitable habitat quality that allow for regular animal movement between two or more relatively undisturbed habitat areas. Corridors are especially important for dispersal, seasonal migration, breeding, and foraging, and their effectiveness depends on factors such as habitat quality, width, continuity, cover, and the degree of surrounding disturbance.

Habitat linkages may include a range of landscape features that provide varying levels of connectivity, whereas corridors represent a more narrowly defined, structurally continuous movement pathway. The Biological Assessment determined that the Project Site is surrounded by urban development and does not contain or function as a regional wildlife corridor or habitat linkage connecting to large natural open space areas. Therefore, implementation of the Project is not expected to interfere substantially with the movement of any native resident or migratory wildlife species, established native resident or migratory wildlife corridors, nor native wildlife nursery sites, resulting in no impact.

e. Would the project conflict with any local policies or ordinances protecting biological resources?

No Impact

Implementation of the proposed Project would require the removal of all trees and vegetation on the Project Site. However, as detailed in the Biological Assessment, there is no critical habitat for any federally listed plants within or surrounding the Project Site, and the Project Site includes non-native species of vegetation. Additionally, the City does not have a tree preservation policy. For these reasons, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, resulting in no impact.

4.4.6 Cumulative Impacts

The City's 2030 General Plan Program EIR determined that although a majority of the Planning Area consists of agricultural and urban uses, Valley Foothill Riparian habitat can be found adjacent to the Santa Clara River and Marine, Coastal Scrub, and Saline Emergent Wetland habitats can be found along the western (or coastal) portion of the Planning Area. A number of sensitive plant species are known to occur or have the potential to occur within these habitats, including Ventura Marsh milk-vetch (*Astragalus pycnostachyus var. lanosissimus*), Salt marsh birds beak (*Chloropyron maritimum* ssp. *maritimum*) and slender-horned spineflower (*Dodecahema leptoceras*) are associated with these habitat types. Similarly, numerous special-status bird, mammal, invertebrate, fish, and reptile species are also found within these habitats, including Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), Western snowy plover (*Charadrius nivosus nivosus*), California least tern (*Sternula antillarum browni*), and Tidewater goby (*Eucyclogobius newberryi*).Many of the habitats provide important foraging, dispersal, and migratory corridors for both common and special status species within the Planning Area and the surrounding region.

Development allowed by the General Plan could result in habitat conversion, indirect impacts, and habitat fragmentation. However, the General Plan policies would require biological resource assessments and mitigation to reduce impacts, if applicable. Additionally, while implementation of the General Plan could result in the conversion of small amounts of habitat areas within the Planning Area to a developed or urban use, the General Plan policies would designate some habitat areas under a General Plan land use designation that would protect those habitats from future development. Because the General Plan focuses future development away from sensitive habitat areas and will implement a number of comprehensive policies (designed to minimize biological resource impacts, impacts to biological resources are considered less than significant.

The Project Site is largely disturbed, surrounded by urban development, and has long been planned for development. The Project would be consistent with the City's applicable biological resource policies by developing a biological resource assessment and provides **MM BIO-1** to **MM BIO-5** to reduce potentially significant biological resources to less than significant. Therefore, the Project would not contribute to any significant cumulative impacts on biological resources.

4.4.7 Level of Significance Before Mitigation

Prior to the implementation of mitigation measures, impacts would be significant.

4.4.8 Mitigation Measures

The following mitigation measures are proposed to reduce potential impacts to biological resources to less than significant:

MM BIO-1: **Pre-Construction Surveys and Monitoring for Nesting Raptors and Migratory Birds.**

The following actions should be undertaken to avoid and minimize potential impacts to nesting birds: To the extent feasible, construction activities will be scheduled to avoid the nesting season and occur between October and January. For activities that cannot avoid the nesting season (February 1 to August 31), not more than 30 days prior to initiation of construction activities (e.g. mobilization and staging) and no more than 5 days prior to initiation of construction activities, a qualified biologist shall conduct pre-construction surveys for nesting raptors and other migratory birds. The survey for the presence of nesting raptors shall cover all areas within the disturbance footprint plus a 500-foot buffer where access can be secured. The survey for Protected birds shall cover all areas within the disturbance footprint plus a 250-foot buffer. If project activities completely cease for five days during the nesting season, the pre-construction nesting survey shall be conducted again to ensure no nesting birds have moved into the Project site.

Survey reports shall be submitted to the appropriate agency(s), if requested, within one week of completing pre-construction nesting surveys.

There is moderate potential for overwintering burrowing owl within the Project Site and a California horned lark was observed during the survey. If active nests (nests with eggs or chicks) are located, the qualified biologist shall establish an appropriate avoidance buffer ranging from 50 to 500- feet based on the species biology and current and anticipated disturbance levels occurring in vicinity of the nest. All buffers shall be marked using high-visibility flagging, fencing, and/or signage. No construction activities shall be allowed within the buffers until the nest is determined inactive by a qualified biologist. Encroachment into the buffer shall be conducted at the direction of a qualified biologist.

Monitoring reports summarizing nest avoidance measures, including buffers, fledge dates, and documentation of the avoidance of fully protected species, if applicable, shall be submitted to the City of Oxnard monthly while nest buffers are in place or while activities are occurring within the specified buffer of an inactive nest of a fully protected species.

MM BIO-2: Protocol Level Non-Breeding Season Surveys for Burrowing Owl.

Protocol level non-breeding season surveys for burrowing owl shall be conducted by a qualified biologist prior to ground disturbance associated with construction activities. The surveys shall be conducted in accordance with the guidelines described in the CDFW Staff Report on Burrowing Owl Mitigation, 2012. A minimum of four (4) visits surveys will be conducted, spread evenly, throughout the nonbreeding season (September 1 to January 31). Each survey will consist of straight line transect between 7 and 20 meters apart in all suitable burrowing owl habitat. Surveys will be conducted within 5 days prior to the commencement of ground

disturbance activities within the Project Site and a 250-foot buffer area around the Site, where access is permitted.

A survey report will be prepared and submitted to CDFW in accordance with the guidelines described in the CDFW Staff Report on Burrowing Owl Mitigation, 2012. If burrowing owls are detected within the Project Site or within the 250-foot 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 overwintering sites.

MM BIO-3: Pre-Construction Surveys for Roosting Bats.

To avoid the direct loss of bats that could result from disturbance to trees or structures that may provide maternity roost habitat (e.g., in cavities or under loose bark) or structures that contain a hibernating bat colony, the following steps shall be taken:

- To the extent feasible, demolition or disturbance to suitable bat roosting habitat shall be scheduled between October 1 and February 28, outside of the maternity roosting season.
- If trees must be encroached during the maternity season (March 1 to September 30), or structures must be removed at any time of the year, a qualified biologist shall conduct a minimum of two pre-construction surveys to identify those trees or structures proposed for disturbance that could provide hibernacula or nursery colony roosting habitat for bats. The pre-construction surveys should be conducted with a handheld active monitoring detector plus night vision. Additionally, a passive monitoring detector should be deployed for three nights. If roosting bats are found a buffer should be established in addition to a qualified monitor. Pre-construction surveys should be conducted before the start of construction activities and if project-related activities are halted for five days or more.
- Each tree or structure identified as potentially supporting an active maternity roost and each structure potentially supporting a hibernating colony shall be closely inspected by the qualified biologist no greater than seven days prior to tree disturbance to more precisely determine the presence or absence of roosting bats.
- In the event a maternal or hibernating colony of bats is found no work shall be conducted within 300 ft of the roosting site until the maternal season is over or the bats have left the site. The roosting site should be designated a sensitive area and protected as such until the bats have left the site. No clearing or grubbing should occur within the 300 ft buffer of the site. In addition, no combustion equipment such as generators, pumps, and vehicles should not be parked nor operated in the buffer area. Fencing or other barriers should be installed around the buffer area and construction personnel should not be allowed to enter areas beneath the roosting site, especially during the evening exodus.

MM BIO-4: Crotch's Bumble Bee Surveys and Avoidance.

Prior to the initiation of ground-disturbing activities, including grading and vegetation removal, a qualified biologist shall conduct protocol-level surveys for Crotch's bumble bee (*Bombus crotchii*) in accordance with current California Department of Fish and Wildlife (CDFW) guidance, where applicable, and based on appropriate seasonal survey windows when the species is most likely to be detected. Surveys shall focus on suitable foraging and nesting habitat within and immediately adjacent to the Project Site, including areas with flowering plant resources and small mammal burrows or other potential nesting substrates.

If Crotch's bumble bee is not detected during protocol-level surveys, no further action is required. If the species is detected, the qualified biologist shall establish appropriate avoidance buffers around active nesting or high-use foraging areas, as feasible, to prevent direct impacts during construction. The extent of buffers shall be determined by the qualified biologist in coordination with CDFW, as appropriate.

If avoidance is not feasible, additional measures shall be developed in coordination with CDFW to minimize impacts, which may include seasonal restrictions, relocation of individuals where authorized, or other agency-approved measures. A Worker Environmental Awareness Program (WEAP) shall be conducted to inform construction personnel of the potential presence of Crotch's bumble bee and the required avoidance measures. The qualified biologist shall monitor initial ground-disturbing activities in suitable habitat to ensure compliance with avoidance and minimization measures

MM BIO-5: Special-Status Reptile Clearance and Relocation.

Prior to the initiation of ground-disturbing activities, including grading, excavation, and vegetation removal, a qualified biologist shall conduct a pre-construction clearance survey within all suitable habitat areas for special-status reptile species, including California legless lizard (*Anniella spp*.), Southern California legless lizard (*Anniella stebbinsi*), and coastal whiptail (*Aspidoscelis tigris stejnegeri*). Protocol-level surveys shall be conducted during the appropriate survey season and prior to initiation of ground-disturbing activities in suitable habitat.

The clearance survey shall focus on areas with suitable habitat, including sandy or loose soils, vegetated areas, and cover objects (e.g., debris, leaf litter). Any suitable cover objects within the impact area shall be carefully inspected and removed under the supervision of the qualified biologist.

If special-status reptiles are observed during the clearance survey or during construction, the qualified biologist shall capture and relocate individuals to suitable habitat outside of the impact area, in accordance with applicable CDFW guidelines and any required permits or authorizations. Relocation sites shall be selected to

provide similar habitat conditions and shall be located outside of the construction disturbance area.

If any special-status reptile is encountered during construction activities, work in the immediate vicinity shall cease until the individual is safely relocated by the qualified biologist. The qualified biologist shall monitor initial ground-disturbing activities in suitable habitat to ensure compliance with this measure. A Worker Environmental Awareness Program (WEAP) shall be conducted to inform construction personnel of the potential presence of special-status reptiles and the procedures to follow if individuals are encountered.

4.4.9 Level of Significance After Mitigation

With the implementation of **MM BIO-1** through **MM BIO-5**, potential impacts to biological resources would be less than significant.

4.5 CULTURAL RESOURCES

This section discusses the presence and potential for cultural resources within the Project Site and evaluates potential impacts from implementing the proposed Sub-Neighborhood Plan on those cultural resources. As discussed in the Initial Study (**Appendix A**), the impact associated with the following Threshold was determined to be less than significant: c: disturb any human remains. Therefore, further detailed evaluation is not provided for this topic because the Project will not create significant impacts in this area.

This section incorporates information from the Historical Resources Report (**Appendix G**) prepared by Post/Hazeltine Associates; the Phase I Archaeological Study (Phase I Report) (**Appendix H**), Extended Phase I Archaeological Testing Report (XPI Report) (**Appendix I**), and Phase II Archaeological Testing Report (Phase II Report) (**Appendix J**) prepared by Provenience Group, Inc. (PGI); and a Structural Inspection Report (**Appendix K**) which collectively provides information regarding the potential presence and condition of cultural resources within the Project Site.

4.5.1 Existing Conditions

Regional and Historical Context

As detailed in the Phase I Report (**Appendix H**), the Project Site is located on the Oxnard Plain within Ventura County, an area with a long history of Native American occupation followed by Euro-American agricultural development. The Oxnard Plain has been inhabited for thousands of years, with archaeological evidence in the region documenting prehistoric settlement associated with coastal and inland resource use. Cultural resources recorded in the broader region include prehistoric lithic scatters, shell middens, village sites, and burial areas associated with Chumash cultural groups. The generally flat topography and proximity to historic watercourses in the greater Oxnard Plain have historically supported both prehistoric and historic-period land use; however, extensive agricultural cultivation and urbanization in the Project vicinity have substantially disturbed native soils in many areas.[1]

As detailed in the Historic Resources Report (**Appendix G**), historic-era development of the Oxnard Plain intensified in the late nineteenth century with agricultural expansion, sugar beet cultivation, and associated settlement. The Project Site was historically owned and farmed by the Maulhardt family, early German-American settlers who contributed to the agricultural development of the region beginning in the late 1800s. The Project Site historically functioned as an agricultural ranch complex that included a primary residence, barn, ancillary structures, and citrus cultivation. By the late 1950s, due to expanding industries and nearby military bases in Ventura County, residential subdivisions and commercial development began on farmland in the Project area. Aerial photos from

1 Providence. *Phase I Archaeological Study*. 2024. **Appendix H**.

the 1950s to the mid-2000s show the steady replacement of agricultural land with urban development.[2]

Project Site

The Project Site was used for agricultural until 2019, when Area B was purchased by the Oxnard Union High School District (OUHSD) for the development of Del Sol High School. Areas A and C are still owned by the Maulhardt family. Area A is undeveloped and disturbed land previously used for agriculture, and Area C contains several structures and features associated with the Maulhardt family residence and past agricultural use of the site, including the main residence, garage/living quarters, cottage, carriage house, shed, barn, farm equipment building, paddocks/stalls, outbuilding #1, outbuilding #2, modular #1, modular #2, carport, gate piers, swimming pool, designed landscape, and farmland.[3]

4.5.2 Regulatory Framework

Federal

National Register of Historic Places (NRHP)

NRHP Criteria of Evaluation

The NRHP is the official federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture. The program was established by the National Historic Preservation Act of 1966[4] and is administered by the National Park Service under the U.S. Department of the Interior. The NRHP recognizes resources significant at the local, state, or national level under one or more of the following criteria set forth in Title 36 of the Code of Federal Regulations, Part 60:

1. It is associated with events that have made a significant contribution to the broad patterns of our history; or
2. It is associated with the lives of persons significant in our past; or
3. It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; or
4. It has yielded, or may be likely to yield, information important in prehistory or history.

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2 Post/Hazeltine Associates. *Historic Resources Report*. 2025. **Appendix G**.

3 Post/Hazeltine Associates. *Historic Resources Report*. 2025. **Appendix G**.

4 United States Code. Title 54. Section 300101 et seq. 2018.

Generally, a property must be at least 50 years old and retain integrity of location, design, setting, materials, workmanship, feeling, and association to be considered eligible.[5] The NRHP provides a national framework for evaluating historic resources, and resources listed in or eligible for the NRHP are considered historic resources under CEQA when federal, state, or local projects may affect them.[6]

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) statute and guidelines include procedures for identifying, analyzing, and disclosing potential adverse impacts to historical resources, which include all resources listed in or formally determined eligible for the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), or local registers. CEQA further defines a "historical resource" as a resource that meets any of the following criteria: CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources.[7] Section 15064.5(a) (3) of the CEQA Guidelines defines a "historical resource" as a resource that meets one or more of the following:

- A resource listed in, or determined to be eligible for listing in, the NRHP or CRHR;
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code, unless the preponderance of evidence demonstrates that it is not historically or culturally significant;
- A resource identified as significant (i.e., rated 1-5) in a historical resource survey meeting the requirements of Public Resource Code Section 5024.1(g) (Department of Parks and Recreation Form 523), unless the preponderance of evidence demonstrates that it is not historically or culturally significant; or
- Any object, building, structure, site, area, place, record or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California, provided the determination is supported by substantial evidence in light of the whole record. Generally, a resource is considered "historically significant" if it meets the criteria for listing on the CRHR (CEQA Guidelines Section 15064.5).

5 Code of Federal Regulations. Title 36. Part 60.4.

6 California Public Resources Code. Sections 5024–5024.1.

7 California Public Resources Code. Section 21084.1.

California Register of Historical Resources (CRHR)

CRHR Criteria of Evaluation

All resources listed in or formally determined eligible for the NRHP are eligible for the CRHR.[8] The CRHR is a listing of California resources that are significant within the context of California's history. The CRHR is a statewide program of similar scope to the NRHP. In addition, properties designated under municipal or county ordinances are eligible for listing in the CRHR.[9] A historic resource must be significant at the local, state, or national level under one or more of the following criteria that are defined in the California Code of Regulations Title 14, Chapter 11.5, Section 4850:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
5. It is associated with the lives of persons important to local, California, or national history; or
6. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
7. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The CRHR criteria are similar to NRHP criteria, and are tied to CEQA, as any resource that meets the above criteria is considered a historical resource under CEQA.

Administrative Code, Title 14, Section 4307

Administrative Code, Title 14, Section 4307 prohibits individuals from removing, injuring, defacing, or destroying any object of paleontological, archaeological, or historical interest or value.

Government Code, Sections 6253, 6254, and 6254.10

Government Code, Sections 6253, 6254, and 6254.10 states that disclosure of archaeological site information is not required for records that relate to archaeological site information maintained by the Department of Parks and Recreation, the State Historical Resources Commission, or the State Lands Commission.

Penal Code, Title 14, Section 622.5

Penal Code, Title 14, Section 622.5 establishes as a misdemeanor offense for any person, other than the owner, who willfully damages or destroys archaeological or historic features on public or privately-owned land.

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8 California Public Resources Code. Section 5024.1(d)(1).

9 California Public Resources Code. Section 5024.1(e)(4)–(5).

California Health and Safety Code, Section 7050.5-7052 and 8010-8011

Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC within 24 hours. Section 7052 of the Health and Safety Code states that it is a felony to disturb Native American burials. Section 8010-8011 establishes a state repatriation policy to ensure that all California Indian human remains, and cultural items are treated with dignity and respect and encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California.

California Code of Regulations, Section 1427

California Code of Regulations, Section 1427 recognizes that California's archaeological resources are endangered by urban development and that these resources need preserving. This section establishes as a misdemeanor the willful injury, disfigurement, defacement, or destruction of any object or thing of archaeological or historical interest or value by someone who is not the owner, whether situated on private lands or within any public park or place.

Senate Concurrent Resolution Number 43

Senate Concurrent Resolution Number 43 requires all state agencies to cooperate with programs of archaeological survey and excavation, and to preserve known archaeological resources whenever reasonable.

Regional and Local

City of Oxnard General Plan Goals and Policies

Among the City of Oxnard's 2030 General Plan Goals and Policies Related to cultural resources are the following:

Chapter 3 Community Development

Goal CD-7 Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.

Policy CD-7.4 ***Urban Village Design Guidelines***

Develop Urban Village Design Guidelines that incorporate the following features, where appropriate:

- *Provide a variety of transportation choices and an interconnected multi-modal mobility network.*
- *Offer a variety housing choices and opportunities, including at least 15 percent affordable housing.*

- *Encourage compact development in order to free up more private and civic open space.*
- *Preserve open space, historic, cultural, and natural assets.*
- *Use green and sustainable building and planning technologies.*
- *Incorporate methods of measuring vehicle trips as part of the metrics required for a Sustainable Community Strategy (SB 375).*

Policy CD-9.1 ***Neighborhood Identity***

Recognize, preserve, and improve the visual identity and character of existing neighborhoods. Infill development shall respect historic structures and be of compatible scale and character with historic areas.

Goal CD-11 Protected historic and authentic qualities of Oxnard's traditional neighborhoods and historic districts

Policy CD-11.3 ***Protect and Enhance Cultural Resources***

Ensure that new public and private investment protects and enhances Oxnard's existing cultural resources, traditional neighborhoods, and historic districts, to the extent feasible.

Policy CD-11.4 ***Incorporate Historic Features***

Require new developments within historic areas to incorporate historic and natural features and adaptive reuse into site development planning.

Chapter 5 Environmental Resources

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

Policy ER 1.1 ***Protect Oxnard's Natural and Cultural Resources***

Protect the City's natural resource areas, fish and wildlife habitat, scenic areas, open space areas, parks, and cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible.

Goal ER-9 Enhanced perceived character and quality of the City of Oxnard.

Policy ER-9.2 ***Enhance Neighborhood Diversity***

Enhance neighborhood diversity and reinforce the desirable elements of neighborhood character and quality through incorporation of design guidelines, use of landscape materials, and encouraging new developments to integrate historical and culturally significant elements into proposed projects.

Goal ER-11 Identification, protection, and enhancement of the City's archaeological, historical, and paleontological resources.

Policy ER-11.1 ***Archaeological Resource Surveys***

Continue to require a qualified archaeologist to perform a cultural resources study prior to project approval. Inspection for surface evidence of archaeological deposits, and archaeological monitoring during grading should be required in areas where significant cultural resources have been identified or are expected to occur.

Policy ER-11.2 ***Mitigating the Impact of New Development on Cultural Resources***

Ensure that alternatives are considered, including planning construction to avoid archeological sites, deeding archaeological sites into permanent conservation easements, and planning parks, greenspace, or other open space to incorporate archaeological sites in the event that development threatens significant archaeological resources.

Policy ER-11.3 ***Development Applicants to Conduct Research***

Continue to require project applicants to have a qualified archaeologist conduct a record search at the South Central Coast Information Center located at California State University Fullerton and other appropriate historical repositories, conduct field surveys where appropriate, and prepare technical reports, where appropriate, meeting California Office of Historic Preservation Standards (Archaeological Resource Management Reports) prior to project approval.

Policy ER-11.4 ***Historic Preservation***

Support public and private efforts to preserve, rehabilitate,

and continue the use of historic structures, sites, and districts. Where applicable, preservation efforts shall confer with the Ventura County Cultural Heritage Board and conform to the current Secretary of the Interior's Standards for Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building and the California Office of Historic Preservation.

Policy ER-11.6 ***Identification of Archaeological Resources***

In the event that archaeological/paleontological resources are discovered during site excavation, continue to require that grading and construction work on the project site is suspended until the significance of the features can be determined by a qualified archaeologist/paleontologist.

Policy ER-11.8 ***Historical Resource Inventory***

Maintain a historical resource inventory, discourage demolition or alteration of historical buildings unless they are declared unsafe, and strongly encourage rehabilitation and/or adaptive reuse.

City of Oxnard Resolution 10,135

In 1991, the Oxnard City Council adopted Resolution No. 10,135 for the City, involving procedures and standards for declaring Ventura County landmarks, monuments, and points of historical interest, and requesting that the Ventura County Cultural Heritage Board be established with the same composition, duties, and powers as provided in the County of Ventura Cultural Heritage Ordinance.

Ventura County Cultural Heritage Ordinance

The Ventura County Cultural Heritage Ordinance[10] recognizes cultural and historic resources as essential to preserving a high-quality environment for present and future generations. The ordinance also fosters awareness and appreciation of Ventura County's rich history among residents and visitors; and acknowledges that protecting these resources relies on the dedication of individuals, advocates, property owners, and community organizations committed to their preservation, rehabilitation, restoration, and reconstruction.

10 Ventura County. Ordinance Code. Ordinance No. 4604. Article 5. Chapter 3. Division 1.

Ventura County Cultural Heritage Board

The purpose of the Ventura County Cultural Heritage Board is to "research and record County history and to make historic landmark designations."[11] According to the ordinance, the Cultural Heritage Board is responsible for reviewing plans that entail alterations or demolition to any site designated as an official County Landmark, Site of Merit, Point of Interest, or District. They have the authority to assess and make determinations of eligibility for landmarking using the following Criteria for Landmark, Site of Merit, Point of Interest, and District.

Criteria for Landmark, Site of Merit, Point of Interest, and District Status Codes:

1. Character, interest or value, regardless of age, is significant to the heritage of the community.
8. A significant historical event occurred at the site.
9. It is reminiscent of an early state of development.
10. It is identified with a person who significantly contributed to the culture or development of the County, State, or the Nation.
11. It exemplifies a particular architectural style or way of life.
12. It is the design or work of a person whose efforts have significantly influenced the heritage of the County.
13. It demonstrates outstanding architectural design, detail, materials, or craftsmanship.
14. Its preservation is essential to the integrity of another landmark.
15. Its location or physical characteristics represent an established visual feature of a neighborhood.
16. It has potential of yielding significant information of archaeological interest.
17. It is a natural environment that strongly contributes to the well-being of the community

4.5.3 Significance Thresholds

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5?

b) Would the project cause a substantial adverse change in the significance of a unique archaeological resource pursuant to State CEQA Guidelines Section 15064.5?

4.5.4 Methodology

Historic Resources

The Historic Resources Report (**Appendix G**) prepared by Post/Hazeltine Associates, evaluates potential historic resources within the Project Site based on a literature review and site survey, and

11 Ventura County. Ordinance Code. Ordinance No. 4604. Article 5. Chapter 3. Division 1.

assesses potential impacts associated with the development of the proposed Sub-Neighborhood Plan. The report found that the Project Site contains several existing structures and features in Area C is presented in **Table 4.5-1: Area C – Buildings and Features** with the locations of these features shown in **Figure 4.5-1: Area C – Buildings and Features.**

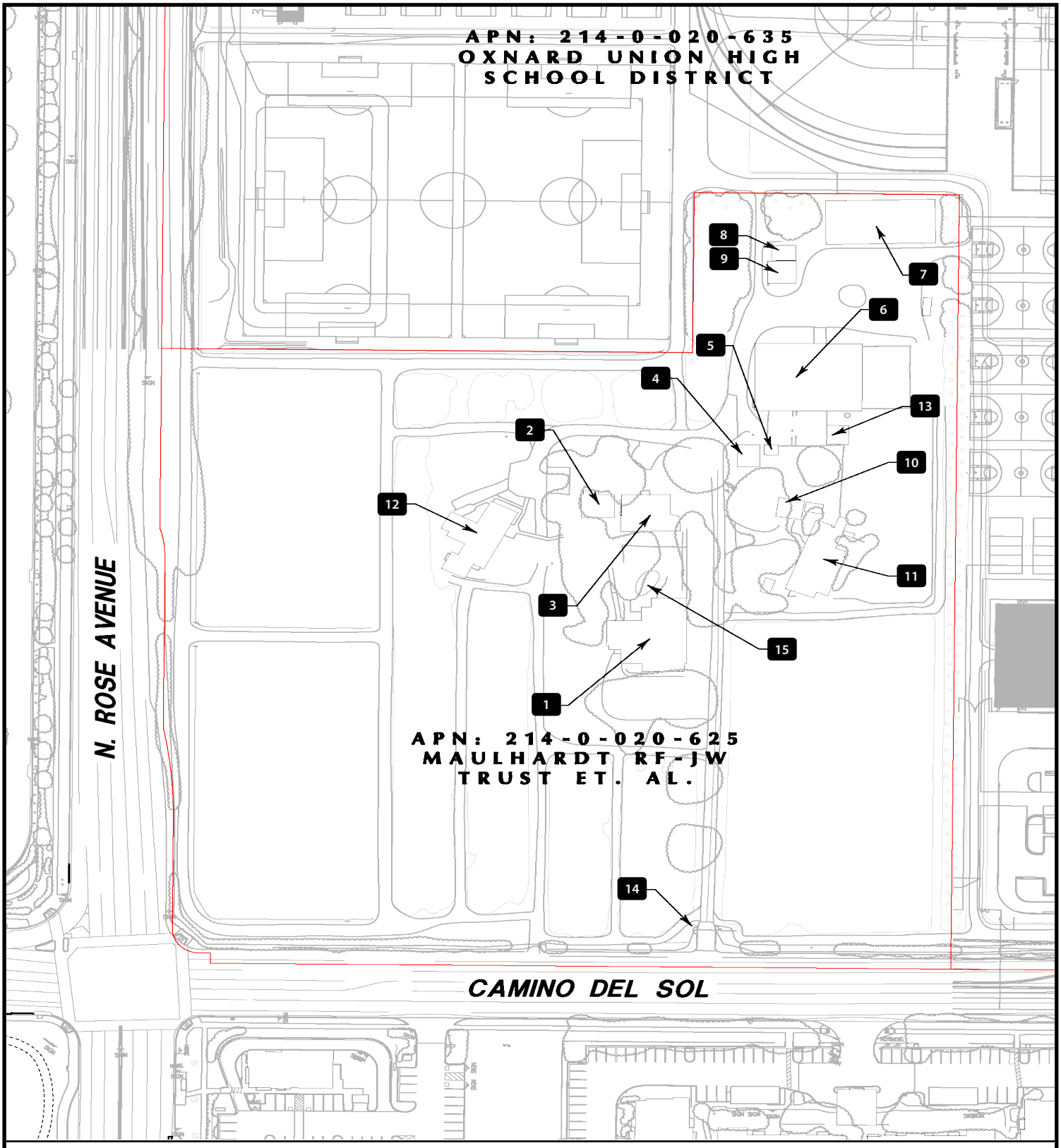
TABLE 4.5-1: AREA C – BUILDINGS AND FEATURES

Resource	Architectural Style	Function	Construction Date	50+ Years Old	Less Than 50 Years
Main Residence	Arts & Crafts/ Prairie/ Mediterranean designed by regionally notable architect, Alfred F. Priest	Maulhardt family residence	1916	X	
Garage/Living Quarters	Arts & Crafts/ Prairie/ Mediterranean designed by regionally notable architect, Alfred F. Priest	Family garage	1916	X	
Cottage	Vernacular	Worker's cottage	c.[1]1885-1910	X	
Carriage House	Vernacular	Family carriage	c.1885-1910	X	
Shed	Vernacular	Potentially poultry yard	c.1910-1925	X	
Barn	Vernacular	Stable mules	1906	X	
Farm Equipment Building	Vernacular	Storage, farm equipment	c.1920-1938	X	
Paddocks/Stalls	Vernacular	Horses	After the 1940s	X	
Outbuilding #1	Vernacular	Original use unknown	c.1885-1910	X	
Outbuilding #2	Vernacular	Original use unknown	c.1885-1910	X	
Modular #1		Residential	c. 1972	X	
Modular #2		Residential	c. 1972	X	
Carport	Vernacular	Carport/ storage	c. 1972	X	
Gate Piers	Vernacular		After 1944	X	
Swimming Pool			c. 1970s		X
Designed Landscape		Setting for main residence	c. 1916 – 1970s	X	
Farmland		Agricultural	1873-2019	X	

Notes:

[1] *Circa*

Source: Post/Hazeltine Associates. *Historic Resources Report*. 2025 **(Appendix G**).



Legend:

1. Main Residence
2. Garage / Living Quarters
3. Cottage
4. Carriage House
5. Shed
6. Barn
7. Equipment Storage Building
8. Outbuilding No. 1
9. Outbuilding No. 2
10. Carport
11. Modular Dwelling No. 1
12. Modular Dwelling No. 2
13. Paddocks and Horse Stalls
14. Gate Piers
15. Swimming Pool

N

0 50 100 200

APPROXIMATE SCALE IN FEET

SOURCE: Post/Hazeltine - 2025.

FIGURE **4.5-1**

Meridian Consultants

Area C: Buildings and Features

Historic Landscape

Areas A and C contain undeveloped land that suggests a historic agricultural landscape; however, this type of landscape is no longer present within the Project Site. Active agricultural production ceased in 2019, and the only remaining agricultural feature is a small lemon orchard in Area C that is no longer actively cultivated. While the Maulhardt residence, barn, and associated structures in Area C reflect aspects of the agricultural history of the Project Site, the construction of the high school and surrounding urban development have substantially altered the setting and diminished its historic integrity. Accordingly, the Project Site does not contain a significant historic rural landscape.

Eligible Historic Resources

The Historic Resources Report evaluated whether the structures and features in Area C, part of the Maulhardt Home Place, are eligible as historic resources under the NRHP. In general, a property should be at least 50 years old and must meet one of the four NRHP criteria (Criteria A to D) to be considered eligible. As shown in **Table 4.5-1** above, several of the structures and features are above 50 years old. **Table 4.5-2: Potential Historic Contributors** identifies resources on the Project Site that are eligible under one or more of the NRHP criteria.

Under Criterion A (association with significant events), several structures qualify because of their direct association with the development and history of the agricultural industry on the Oxnard Plain from the early 1870s through the present.

Under Criterion B (association with significant persons), several structures also qualify due to their direct association with Jacob Maulhardt and his son, Louis Maulhardt. Both are considered historically significant figures for their contributions to the emergence of the Oxnard Plain as one of California's most productive agricultural areas. The efforts of early farm families like the Maulhardts played a central role in the growth of the agricultural industry during the late nineteenth and early twentieth centuries.

Under Criterion C (distinctive design, construction, or artistic value), the remnants of the designed landscape, barn, cottage, carriage house, shed, equipment storage building, outbuildings #1 and #2, and modular houses #1 and #2 do not embody architectural or design attributes that make them individually eligible. However, the cluster of farm buildings, including outbuildings #1 and #2, the equipment storage building, the carriage house, and shed, retain their original location, along with sufficient materials and design, to convey their historic agricultural function. The main residence and garage/living quarters, designed by regional architect Alfred Priest, exemplify the Arts and Crafts/Prairie Style and are individually eligible under Criterion C for their architectural significance. In addition, the mule barn, a rare surviving example of an early twentieth-century, two-level barn in Oxnard, is individually eligible under Criterion C.

Criterion D (potential to yield important historical or prehistorical information) was not addressed in the Historic Resources Report, but is analyzed under the archaeological studies conducted by PGI.

TABLE 4.5-2: POTENTIAL HISTORIC CONTRIBUTORS

Resource	Architectural Style	Potential Historic Resource Contributor	Construction Date	Criteria
Main Residence	Arts & Crafts/ Prairie/ Mediterranean designed by regionally notable architect, Alfred F. Priest	Yes	1916	A, B, C
Garage/Living Quarters	Arts & Crafts/ Prairie/ Mediterranean designed by regionally notable architect, Alfred F. Priest	Yes	1916	A, B, C
Cottage	Vernacular	No	c.[1]1885-1910	A, B, C
Carriage House	Vernacular	Yes	c.1885-1910	A, B, C
Shed	Vernacular	Yes	c.1910-1925	A, B, C
Barn	Vernacular	Yes	1906	A, B, C
Farm Equipment Building	Vernacular	Yes	c.1920-1938	A, B, C
Paddocks/Stalls	Vernacular	Yes	After the 1940s	A, B, C
Outbuilding #1	Vernacular	Yes	c.1885-1910	A, B, C
Outbuilding #2	Vernacular	Yes	c.1885-1910	A, B, C
Modular #1		No	c. 1972	
Modular #2		No	c. 1972	
Carport	Vernacular	No	c. 1970s	
Gate Piers	Vernacular	No	After 1944	
Swimming Pool		No	c. 1970s	
Designed Landscape		No	c. 1916 – 1970s	
Farmland		No	1873-2019	

Notes:
[1] *Circa.*

Source: Post/Hazeltine Associates. *Historic Resources Report*. 2025 **(Appendix G**).

Under the NRHP framework, the Seven Aspects of Integrity are used to determine whether a built resource retains the physical characteristics and historic qualities necessary to convey its historical significance. Even when a property meets significance criteria, it must also retain sufficient integrity in its location, design, setting, materials, workmanship, feeling, and association to be considered an eligible historic resource. These aspects provide a standardized method for evaluating whether past

alterations, landscape changes, or surrounding development have diminished the property's ability to express the values that make it historically important. Analysis of integrity was conducted as part of the Historic Resources Report and detailed below.

The CRHR four eligibility criteria parallel those of the NRHP but are applied in relation to California's historical context. Additionally, all resources listed on or formally determined eligible for the National Register are automatically listed in the California Register. Additionally, the Historic Resources Report determines if any of the Project Site contains landmarks or is part of a historic district in the analysis below.

Archeological Resources

The Phase I Report (**Appendix H**), XPI Report (**Appendix I**), and Phase II Report (**Appendix J**) prepared by Provenience Group, Inc. (PGI) evaluates the potential for archaeological resources to be present within the Project Site based on literature review, site surveys, subsurface excavations, and lab testing, and assesses potential impacts associated with the development of the proposed Sub-Neighborhood Plan based on the Criteria 1-4 under the California Register.

The Phase I Report conducted for the Project Site included a record search at the South Central Coastal Information Center (SCCIC) in August 2024 and a pedestrian survey conducted in September 2024 and October 2024 to determine the potential for archaeological resources to be present within the Project Site. The record search determined that there could be potential archeological resources within the Project Site located in Area B. However, the New High School No. 8 EIR, which approved the development of Del Sol High School in Area B, determined that impacts to archaeological resources would be less than significant with mitigation through implementation of **MM CUL-1** and **MM CUL-2**. These measures require a Worker Environmental Awareness Program (WEAP) and archaeological monitoring during ground-disturbing activities to ensure that any unanticipated archaeological resources encountered during construction are properly identified, evaluated, and treated in accordance with City and State regulations.

During the pedestrian survey a small, sparse scatter of historic glass, ceramic, and marine shell fragments was identified near a slight depression just north of the Maulhardt residence. The presence of the artifact scatter suggested possible past use of this area for disposal of refuse. Due to the scarcity of artifacts and lack of diagnostic markers, there was uncertainty about whether the artifacts represented discarded items from early occupation of the ranch, or from more recent times.

For this reason, additional investigations were conducted as part of the Extended Phase I Report. Three shovel test probes (STPs) were completed in the northern portion of the Maulhardt property in January 2025. Two of the STPs were excavated in the location of a light scatter of historic artifacts at the south end of a lemon orchard, next to the unimproved road leading to homes at the back of the parcel. The third STP was located near the west side of the carriage house where five complete historic bottles were scattered on the ground surface. A sparse scatter of artifacts consisting of

historic glass, ceramic and a marine shell fragment were collected along with five complete historic bottles. These artifacts appear to be associated with household activities at the Maulhardt Ranch with an approximate deposition time between 1930s and 1940s.

Based on the results of the STPs, additional investigations were conducted in July 2025 as part of the Phase II Report, consisting of controlled backhoe trenching, observed by an archeologist, collection of artifacts and followed by lab analysis of these artifacts to identify the composition and distribution and potential significance in relation to the California Register using the four criteria as thresholds for significance. The artifacts collected appeared to be associated with domestic and ranching tasks at the Maulhardt Ranch, but these artifacts did not possess a clearly defined date range. The earliest possible date of manufacture is 1934, and the most recent possible date of manufacture is 1996. While these results provide some insight into the lives of long-term residents who lived and worked at the Maulhardt Ranch during the twentieth century, none of the artifacts collected date to the earliest occupation of the ranch during the late nineteenth century. Further, no significant subsurface refuse deposits or features were found during the 8 backhoe trenches, and the majority of artifacts (54 percent) were recovered from the surface to a depth of 6-inches. Only two artifacts were recovered at a depth of 21 to 24 inches, and no artifacts were located deeper than 24-inches.

4.5.5 Project Impacts

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

Significant Impact.

As discussed above, the Historic Resources Report (**Appendix G**) determined the main residence, garage/living quarters, carriage house, shed, barn, farm equipment building, paddocks/stalls, outbuilding #, and outbuilding #2 are potential historic resource contributors. Although the several buildings and structures are over 50 years old and associated with the historic agricultural use of the property, the Historic Resources Report concludes that they do not meet the threshold for individual eligibility because they do not embody distinctive architectural characteristics nor retain sufficient integrity to independently convey historical significance.

Under the NRHP framework, the Seven Aspects of Integrity are used to determine whether a built resource retains the physical characteristics and historic qualities necessary to convey its historical significance. Even when a property meets significance criteria, it must also retain sufficient integrity in its location, design, setting, materials, workmanship, feeling, and association to be considered an eligible historic resource. These aspects provide a standardized method for evaluating whether past alterations, landscape changes, or surrounding development have diminished the property's ability to express the values that make it historically important. Analysis of integrity detailed below.

1. Location

Area C was historically situated within the rural vernacular landscape of the Oxnard Plain, which from the late 1800s to mid-1900s was characterized by an orthogonal grid of cultivated fields, orchards, and windrows. Several original farm structures—the main house, garage, cottage, carriage house, barn, and multiple outbuildings—remain in their original positions and date from approximately 1885 to 1938.

Beginning in the 1950s, extensive urban growth across Oxnard led to widespread conversion of surrounding farmland to residential, commercial, and institutional uses. This transformation accelerated when the OUHSD acquired roughly 52 acres of the Maulhardt property in 2021 to construct Del Sol High School. The sale divided the historic property into three parcels, and development of Area B in 2023 resulted in removal of the historic agricultural fields, substantial regrading, and construction of new streets and school facilities immediately adjacent to the ranch yard.

While Area C retains its original grade and contains the surviving historic buildings, the subdivision of the property and the construction of Del Sol High School have significantly altered the historic agricultural setting, circulation patterns, topography, and expansive vernacular landscape that once defined the Maulhardt Home. Because the farm is no longer surrounded by its historic agricultural lands, and its broader landscape and context have been replaced with urban development, the property no longer retains the characteristics necessary to convey its historic rural setting and therefore does not retain integrity of location.

2. Design

Historically, Area C reflected the typical farm layout of late-19th and early-20th-century Ventura County, with cultivated fields bordered by roads and windrows and a central cluster of buildings—including a main house, cottage, barn, and outbuildings—used for workers, animals, and equipment. After 1945, surrounding agricultural lands were increasingly sold and redeveloped for residential, commercial, and institutional uses. In the past four years, the Maulhardt property was subdivided and Del Sol High School was constructed, substantially altering the historic farm layout. As a result, the rural vernacular landscape no longer retains integrity of design.

3. Setting

Although the Project Site still contains certain historic elements—such as the main residence, ranch yard, other buildings, and remnants of lemon orchards—the surrounding acreage has been transformed into a semi-urban/urban environment. Because the broader rural landscape that once framed the property no longer exists, Area C has not retained integrity of setting.

4. Materials

The primary contributing buildings retain key original materials—such as wood siding, framing, roofing profiles, and other historic fabric—sufficient to convey workmanship of the period. Some

buildings exhibit alterations and repairs, but these do not collectively compromise integrity. Integrity of materials is moderately retained.

5. Workmanship

The Project Site retains the main residence and garage/staff quarters built in 1916, along with most ranch yard buildings, which continue to reflect their early craftsmanship and remain largely intact. However, nearly all surrounding farmland and the historic designed landscape have been removed. The cottage no longer reflects its historic appearance, and only small remnants of agricultural land and lemon groves remain. Because the agricultural fields and designed landscape that once expressed the Maulhardt's historic farming practices have been almost entirely lost, the Project Site cannot convey historic agricultural workmanship at the landscape level. While the main residence, garage/staff quarters, barn, and ranch yard buildings individually retain integrity of workmanship, the broader setting does not.

6. Feeling

The Project Site can no longer evoke its historic appearance from the 1872–1945 period due to major changes made after the period of significance, including subdivision of the Maulhardt property, removal of the designed landscape, and construction of Del Sol High School with associated grading and improvements. These alterations have obscured the physical characteristics that once conveyed the property's historic sense of time and place. As a result, the Project Site no longer retains integrity of feeling.

7. Association

The property's association with the Maulhardt family and its historic agricultural operations remains evident through the surviving contributors (main residence, garage/staff quarters, barn, outbuildings). Although the larger landscape that once supported these operations has been removed, the extant buildings continue to provide a physical connection to the activities and individuals significant to the property's history. Therefore, integrity of association is retained.

The CRHR four eligibility criteria parallel those of the NRHP but are applied in relation to California's historical context. Additionally, all resources listed on or formally determined eligible for the National Register are automatically listed in the California Register. Accordingly, the analysis presented above evaluates resources in relation to California history, and all determinations of eligibility reflect NRHP criteria.

For purposes of CEQA, a historical resource is defined pursuant to CEQA Guidelines Section 15064.5 as a resource that is listed in or eligible for listing in the California Register of Historical Resources, listed in a local register of historic resources, or determined significant by the lead agency. Based on the Historic Resources Report, the main residence, garage/living quarters, and barn are eligible for listing in the California Register. These buildings therefore qualify as historical resources under CEQA and are subject to impact analysis. Although several ancillary ranch buildings, including the carriage

house, shed, equipment storage building, and outbuildings, are recognized locally as Points of Interest and contribute to the historic ranch yard grouping, they are not individually eligible for listing in the California Register and do not meet the definition of a historical resource under CEQA.

Landmarks and Districts

The Historic Resources Report evaluated the historic-era buildings and landscape features associated with the Maulhardts for eligibility as City Landmarks and as contributors to a potential historic district under Oxnard Ordinance 4604. The report concludes that the main residence and garage/living quarters retain sufficient integrity of location, design, materials, and workmanship and are therefore eligible as City Landmarks.

The remaining historic-era structures in the ranch yard—including the barn, carriage house, shed, equipment storage building, and outbuildings—also retain enough physical integrity to represent components of an early-20th-century agricultural complex. Collectively, these buildings would constitute contributing elements to a potential historic district because they largely remain in their original configuration and continue to reflect historic craftsmanship and ranch functions.

However, the historic agricultural landscape that once unified these buildings into a cohesive ranch complex has been almost entirely removed due to subdivision of the property, loss of surrounding agricultural fields, construction of Del Sol High School, regrading, and installation of new roadways. As a result, the Project Site no longer retains the setting, location, or feeling necessary for a cohesive historic district. Although the buildings themselves remain largely intact, the broader environment that once defined the Maulhardts has been substantially altered.

For this reason, the Historic Resources Report concludes that no eligible historic district is present, but the surviving ranch yard buildings may qualify as contributors to a district at a City Point-of-Interest designation. The Landmark-eligible buildings and contributing resources are summarized in **Table 4.5-3: Significant Historic Resources**.

TABLE 4.5-3: SIGNIFICANT HISTORIC RESOURCES

Resource	City of Oxnard	California Register	National Register	District (Oxnard)
Main Residence	Landmark	Eligible	Landmark	Yes
Garage/Living Quarters	Landmark	Eligible	Landmark	Yes
Carriage House	Point of Interest	Not Eligible	Not Eligible	Yes
Shed	Point of Interest	Not Eligible	Not Eligible	Yes
Barn	Landmark	Eligible	Landmark	Yes

TABLE 4.5-3: SIGNIFICANT HISTORIC RESOURCES				
Resource	City of Oxnard	California Register	National Register	District (Oxnard)
Farm Equipment Building	Point of Interest	Not Eligible	Not Eligible	Yes
Outbuilding #1	Point of Interest	Not Eligible	Not Eligible	Yes
Outbuilding #2	Point of Interest	Not Eligible	Not Eligible	Yes
Designed Landscape	Point of Interest	Not Eligible	Not Eligible	Yes

Source: Post/Hazeltine Associates. *Historic Resources Report*. 2025 **(Appendix G**).

Impact Assessment

The proposed Sub-Neighborhood Plan would allow the development of residential and commercial uses, and parks, within Areas A and C, which would require the demolition of all buildings in Area C including the main residence, barn and garage that are eligible historic resources. No part of the historic district would be left after project development.

A Structural Inspection Report (**Appendix K**) was prepared in 2019 to determine the structural integrity of the Maulhardt residence and the barn in Area C to determine if these structures could be safely retrofitted, altered, or relocated. This investigation found that the Maulhardt residence is built with heavy masonry and concrete walls (8–12 inches thick) and includes a basement. Due to its weight and construction with masonry and concrete, relocating the house, which is often feasible for wood framed buildings, is not feasible. Breaking the building into sections would compromise its structural integrity, and construction of a new basement would require significant grading and new retaining walls. Additionally, the existing residence does not meet current building safety standards, and moving the structure would require improvements, consistent with the California Historic Building Code[12] to provide for reasonable safety from fire, seismic forces or other hazards for occupants and users of such buildings, structures, and properties and to provide reasonable availability and usability by the physically disabled . The report concludes that rebuilding the house would be more practical than attempting to move it. The report found that the barn was built using outdated methods and is unsafe under conditions like high winds, earthquakes, or roof work. It should not be occupied without major structural retrofitting, and relocation is not structurally feasible.

The Structural Inspection Report determined that the barn's structure is not sound due to outdated framing and numerous deficiencies. The roof framing, constructed with old conventional barn techniques, includes braces and kickers to shorten rafter spans and column lengths, but lacks adequate support for modern loads. A layer of roof sheathing, while adding some lateral stability, increases the roof's weight by over 15,000 pounds, further straining the already weak framing. The roof lacks proper tension ties and bracing, leaving it at risk of collapsing under high winds, seismic

12 California Health and Safety Code. Sections 18950–18961.

activity, or re-roofing. The floor framing is similarly outdated, with conventional spaced floor joists and no diaphragm or plywood flooring. Water damage and efflorescence indicate further deterioration, and the lack of positive connections at post-to-beam joints, along with missing blocking and braces, leaves the floor unstable and prone to collapse under similar stress. Overall, the barn's inadequate structural integrity and lack of necessary reinforcements make it unsafe for occupancy.

Although the Structural Inspection Report determined that the barn was structurally unsafe and is at risk of collapsing inward, demolition of the barn and other eligible historic resources would result in significant and unavoidable impact. The proposed Sub-Neighborhood Plan would require the demolition of historically eligible structures, including the Maulhardt residence, barn, and garage. Accordingly, the Historic Resources Report recommends implementation of **MM CUL-1**, which requires documentation of these resources consistent with the standards of the Historic American Buildings Survey (HABS) and the Historic American Engineering Record (HAER) prior to their demolition. Implementation of **MM CUL-1** would ensure that a detailed record of the historic resources is preserved for the public record; however, because demolition would result in the permanent loss of these resources, the impact would remain significant and unavoidable even with mitigation.

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

Less than Significant Impact with Mitigation Incorporated.

As discussed above, the artifacts that were found during site surveys conducted as part of the Extended Phase I and Phase II Reports appear to be scattered within a disturbed context, their research value has been diminished. For these reasons, the artifacts do not qualify as important or unique cultural resources eligible for the California Register under Criteria 1, 2, 3, or 4.

Although no significant archaeological resources were found in the archaeological surveys for the Project, there still could be the potential to find unanticipated archaeological resources during construction. Proposed **MM CUL-2** would require monitoring by a qualified archaeologist during ground disturbing activities to address any archaeological resources during construction. With the implementation of **MM CUL-2**, impacts to archeological resources would be reduced to less than significant.

4.5.6 Cumulative Impacts

As determined in the General Plan EIR, the Planning Area contains several historic resources and historic districts. However, with the implementation of General Plan policies, historic resources would be protected and new development surrounding the historic resource(s) would be built with similar design, materials, height and bulk of the historic resource(s), resulting in less than significant impacts. Additionally, there are several archaeological and paleontological resources within the City

and there are General Plan policies to require pre-construction surveys and removal of archeological and paleontological resources, resulting in less than significant impacts.

No significant archaeological resources were discovered during the archaeological surveys. Additionally, **MM CUL-2** would ensure the proper removal of unanticipated archaeological resources during construction, resulting in less than significant cumulative impacts regarding archaeological resources.

As discussed above, the proposed Project would result in significant impacts to eligible historic resources. Although the proposed Project would incorporate **MM CUL-1** for the historic resource documentation, the proposed Project would still require the removal of other historic resources and would contribute to the loss of historic resources in the City's Planning Area. Therefore, the proposed Sub-Neighborhood Plan would contribute to significant cumulative impacts to historic resources and would result in cumulatively considerable impacts.

4.5.7 Level of Significance Before Mitigation

Impacts to historic resources would be significant without the incorporation of mitigation measures.

4.5.8 Mitigation Measures

MM CUL-1 Historic Resource Documentation

Prior to the City of Oxnard's acceptance of any property within Area C, the Applicant shall photo-document Area C and prepare a written report documenting existing conditions prior to project construction. The recordation will be of sufficient detail to preserve a visual record of the buildings and their setting and shall meet the Historic American Buildings Survey (HABS)/ Historic American Engineering Record (HAER) standards for documentation and photo-documentation of historic resources at a minimum Level 1 Recordation; however, the documentation is not required to be formally submitted to or accepted by the National Park Service. This documentation will be donated to a suitable repository, such as the Oxnard Public Library and the Museum of Ventura County.

The documentation plan for the Project Site and its setting shall be prepared by the project applicant and reviewed and approved by the City of Oxnard prior to issuance of any grading permit, demolition permit, or other ground-disturbing construction permit affecting the identified historical resources. All photographic and written documentation shall be completed prior to any demolition, alteration, or ground disturbance within Area C. The documentation shall be prepared by a County-approved architectural historian meeting the Secretary of the Interior's Professional Qualification Standards and shall demonstrate experience applying the Secretary of the Interior's Standards for the Treatment of Historic Properties, including the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic

Buildings, consistent with HABS-level documentation requirements. The project applicant shall be responsible for retaining the qualified professional and ensuring completion and submittal of the documentation to the City and the designated local repository prior to commencement of construction activities.

MM CUL-2 Archaeological Monitoring

Prior to issuance of any grading permit or other ground-disturbing permit, the project applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards to prepare a Cultural Resources Monitoring and Inadvertent Discovery Plan (CRMIDP). The CRMIDP shall be submitted to and approved by the City prior to commencement of any ground-disturbing activities.

Consistent with the recommendations of the Phase I, Extended Phase I (XP1), and Phase II archaeological studies, the CRMIDP shall include the following:

1. Identification of archaeologically sensitive areas within Area C, including locations where prior investigations identified historic-period artifact concentrations associated with the Maulhardt Ranch.
2. Archaeological monitoring during initial ground-disturbing activities in identified sensitive areas, including grading, trenching, excavation, and utility installation.
3. Authority for the qualified archaeologist to temporarily halt or redirect construction within at least 50 feet of a discovery until the find can be evaluated.
4. Evaluation of any discovered cultural materials pursuant to CEQA Guidelines Section 15064.5 to determine whether the resource qualifies as a historical resource.
5. If significant archaeological deposits are identified, preparation of a treatment plan prior to resumption of construction in the affected area.
6. Implementation of appropriate treatment measures, which may include avoidance and preservation in place where feasible, or controlled excavation and data recovery if avoidance is not feasible.
7. Documentation of recovered materials, laboratory analysis as appropriate, and curation at an appropriate qualified repository consistent with professional standards.
8. Preparation of a final monitoring and treatment report summarizing monitoring activities, discoveries, and implemented mitigation measures, to be submitted to the City prior to issuance of a certificate of occupancy for the affected phase of development.

4.5.9 Level of Significance After Mitigation

Project impacts to historic resources would be significant and unavoidable after the implementation of **MM CUL-1** and **MM CUL-2.**

4.6 ENERGY

This section of the EIR evaluates the impacts on energy resources from the construction and operation of the proposed Project. Specifically, this section evaluates the demand of energy resources attributable to the Project and makes a determination as to whether the Project would result in potentially significant impacts due to wasteful, inefficient, or unnecessary consumption of resources and whether the Project would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.6.1 Background

Existing Conditions

The Project Site contains vacant, undeveloped land that has been subject to previous disturbance, an existing home, additional residential units and accessory buildings associated with past agricultural use, and an existing high school. Uses on site are vacant, with the exception of Del Sol High School. Del Sol High School is currently operating at half capacity with only freshman and sophomores enrolled. In 2026, the school is anticipated to enroll all high school grade levels at a full capacity of up to 2,500 students.[1] The half capacity of the school (1,250 students) is used to conservatively estimate existing energy use related to these existing uses.

As shown in **Table 4.6-1: Existing Project Annual Operational Energy Demand Summary**, energy consumption from the existing high school on the Project Site was estimated using the California Emissions Estimator Model (CalEEMod) (Version 2022.1.1.30) air emissions model, included in **Appendix E**: **Air Quality, Greenhouse Gas, and Energy Study**. Energy is consumed for multiple purposes associated with the existing uses, including, but not limited to, heating/ventilating/air conditioning; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy is also consumed related to water usage, solid waste disposal, and vehicle trips, among others.

As shown, the estimated electricity demand for the existing Project Site is approximately 1,359,264 kilowatt-hours (kWh) (1.3 GWh [gigawatt-hours]) per year. Southern California Edison (SCE) estimates that electricity consumption within its planning area is approximately 85,870 GWh in 2022.[2] The estimated natural gas consumption for the existing uses is 3,562,458 British thermal units (btu) per year. Based on the 2024 California Gas Report, the California Energy and Electric Utilities

1 Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*. Accessed March 2025. https://files.ceqanet.opr.ca.gov/64030-2/attachment/Hgni8w7hLuA--vUekhSzn9XYr0Sm3HeBZzNz0glEgLi2hyCNwU3RKEqpKLaz0TSjMy-QTA2bLkKSYlvb0.

2 California Energy Commission. "Electricity Consumption by Entity." Accessed March 2025. https://ecdms.energy.ca.gov/elecbyutil.aspx.

estimates natural gas supply within Southern California Gas Company's (SoCalGas) planning area is approximately 1.38 million cubic feet (MMcf) per year in 2024.[3]

TABLE 4.6-1: EXISTING PROJECT ANNUAL OPERATIONAL ENERGY DEMAND SUMMARY

Land Use	Electricity (kWh/yr)	Water Usage		Water-Related Electricity Use (kWh/yr)	Total Annual Electricity Use (kWh)	Total Annual Natural Gas Use (kBTU/yr)
		Indoor (gal/yr)	Outdoor (gal/yr)			
Del Sol High School	1,027,879	4,957,782	0	33,748	1,061,627	3,562,458
Parking Lot	297,637	0	0	0	297,637	0
Total	**1,325,516**	**4,957,782**	**0**	**33,748**	**1,359,264**	**3,562,458**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**
Notes: kWh/yr = kilowatt-hours per year; gal/yr = gallons per year; kBtu/yr = thousand British Thermal Units per year.

Table 4.6-2: Existing Estimated Vehicle Operations Fuel Consumption shows that an estimated 164,156 gallons of gasoline and 26,773 gallons of diesel fuel are consumed per year for the operation of the existing Del Sol High School. For reference, the U.S. Energy Information Administration (EIA) estimates that total crude oil supply was 16.0 million barrels per day in 2023.[4]

TABLE 4.6-2: EXISTING ESTIMATED VEHICLE OPERATIONS FUEL CONSUMPTION

Land Use	Annual VMT	Gasoline Usage (gallons)	Diesel Usage (gallons)
Del Sol High School	4,790,988	164,156	26,773
Parking Lot	0	0	0
Total	**4,790,988**	**164,156**	**26,773**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**
Notes: VMT = vehicle miles traveled.

Electricity

Electricity is typically a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers, that lower transmission line power (voltage) to a level appropriate for use by customers. The electricity generated is distributed through a network of

3 California Gas and Electric Utilities. *2024 California Gas Report*. Accessed October 2024. https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf.

4 U.S. Energy Information Administration. *Annual Energy Outlook 2023*. Accessed October 2024. https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2023.

transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh, or 1 kWh. On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy usage is measured in megawatt-hours (MWh) or GWh, which is one billion watt-hours. According to the California Energy Commission (CEC), the State of California consumed approximately 252,000 GWh of electricity in 2022, with electricity demand projected to rise to approximately 376,000 GWh in 2040, the furthest year of currently available projections.[5]

Electrical power within the City of Oxnard (City) is supplied by SCE, which serves approximately 15 million people in a 50,000-square-mile service area.[6] The SCE service area generated approximately 55,014,996 MWh of electricity in 2022.[7] SCE produces and obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power.

As shown in **Table 4.6-1**, the existing development on the Project Site consumes approximately 1.36 million kWh per year as estimated by CalEEMod and calculated in **Appendix E**.

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network and, therefore, resource availability is typically not an issue. Natural gas satisfies almost one-third of the State's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as transportation fuel. Natural gas is primarily measured in terms of cubic feet (cf), or millions of cubic feet (MMcf), as well as in terms of BTU and Therms.[8]

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5 California Energy Commission. *2023 Integrated Energy Policy Report Update*. Accessed August 2024. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2023-integrated-energy-policy-report.

6 Southern California Edison. "Our Service Territory." Accessed August 2024. https://www.sce.com/about-us/who-we-are/leadership/our-service-territory.

7 Southern California Edison. *Electric Company ESG/Sustainability Quantitative Information*. October 23, 2023. Accessed August 2024. https://download.edison.com/406/files/20239/EIX%20ESG_Template_Version_1_Quantitative_vF%202023%2010%2023.pdf.

8 One Therm is equivalent to 100,000 British thermal units (BTU) or 100 kBTU. A Therm is approximately the energy equivalent of burning 100 cubic feet (1 cf) of natural gas. The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU.

According to the CEC's California Energy Consumption Database, the State of California consumed approximately 11,711 million Therms (11,711,000 Mcf) of natural gas in 2022,[9] with demand projected to rise to 11,900 million Therms (11,900,000 Mcf) in 2040,[10] the furthest year of currently available projections.

SoCalGas is the natural gas purveyor within the City. The SoCalGas service area reaches 21.1 million consumers through 5.9 million meters in more than 500 communities, covering an area of approximately 24,000 square miles throughout Central and Southern California.[11] The SoCalGas planning area had a natural gas throughput of 2,428 Mcf in 2023, with throughput projected to be 2,055 Mcf and capacity projected to be 3,775 Mcf in 2040, the furthest year of currently available projections.[12]

Statewide natural gas demand is projected to decline at an annual rate of 0.7% each year through 2040.[13] The decline in demand is due to modest economic growth, California Public Utilities Commission (CPUC) mandated energy efficiency (EE) standards and programs, as well as Senate Bill (SB) 350 goals. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). By comparison, the 2022 California Gas Report projected an annual decline in demand of 1.1% over the forecast horizon.[14] The forecasted decelerated decline in throughput demand is being driven by reduced energy efficiency and updated fuel substitution assumptions.

As shown in **Table 4.6-1**, the existing high school on the Project Site consumes approximately 3.56 million kBTU of natural gas per year as estimated by CalEEMod and calculated in **Appendix E.**

Petroleum-Based Fuel

Crude oil is a mixture of hydrocarbons that exists as a liquid in underground geologic formations and remains a liquid when brought to the surface.[15] Petroleum products are produced from the

9 California Energy Commission. "Gas Consumption by County." Accessed August 2024. https://ecdms.energy.ca.gov/gasbycounty.aspx.

10 California Energy Commission. *Final 2023 Integrated Energy Policy Report Volume IV California Energy Demand Forecast*. Accessed August 2024. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2023-integrated-energy-policy-report.

11 Southern California Gas Company. "Company Profile." Accessed August 2024. https://www.socalgas.com/about-us/company-profile.

12 California Gas and Electric Utilities. *2024 California Gas Report*.

13 California Gas and Electric Utilities. *2024 California Gas Report*.

14 California Gas and Electric Utilities. *2022 California Gas Report*. Accessed August 2024. https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf.

15 U.S. Energy Information Administration. "Frequently Asked Questions." Accessed August 2024. https://www.eia.gov/tools/faqs/faq.php?id=40&t=6.

processing of crude oil and other liquids and include transportation-related fuels such as gasoline and diesel. Petroleum is a worldwide commodity. According to the U.S. Energy Information Administration (EIA), California consumed approximately 7,303,725 thousand barrels (306,756,450 thousand gallons or 42 gallons per barrel) of petroleum in 2022, the most recent year of publicly available data.[16] The EIA forecasts a national oil supply of 16.63 million barrels per day (mb/d) in 2025.[17] This equates to approximately 6,070 million barrels per year (mb/y) or 254,937 million gallons per year (mg/y).[18]

Over the last several decades, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and greenhouse gas (GHG) emissions from the transportation sector, and reduce vehicle travel. Incentive programs, such as the CEC's Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP), are helping the State to reduce its dependency on gasoline. The CEC predicts that the demand for gasoline will continue to decline over the upcoming years and there will be an increase in the use of alternative fuels.[19]

Based on the current uses on the Project Site, it is estimated that the existing uses on the Project Site consume approximately 190,929 gallons of petroleum (164,156 gallons of gasoline and 26,773 gallons of diesel) per year as estimated by CalEEMod and calculated in **Appendix E** for transportation, as shown in **Table 4.6-2**.

4.6.2 Regulatory Framework

Federal

Corporate Average Fuel Economy (CAFE) Standards

CAFE Standards were first enacted by Congress in 1975 for the purpose of increasing the fuel efficiency of cars and light duty trucks in order to reduce energy consumption.[20] The CAFE Standards were implemented as fleet-wide fuel economy averages to be achieved by car manufacturers. CAFE standards are regulated by the National Highway Traffic and Safety Administration (NHTSA). NHTSA sets and enforces the CAFE standards, while the Environmental Protection Agency (EPA) calculates average fuel economy levels for manufacturers.

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16 U.S. Energy Information Administration. *Annual Energy Outlook 2020*. Accessed August 2024. https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US.

17 U.S. Energy Information Administration. *Annual Energy Outlook 2023, Table 11: Petroleum and Other Liquids Supply and Disposition*. Accessed August 2024. https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2023.

18 One oil barrel is equivalent to 42 gallons.

19 California Energy Commission. *Final 2023 Integrated Energy Policy Report Volume IV California Energy Demand Forecast*.

20 United States Department of Transportation. "Corporate Average Fuel Economy (CAFE) Standards." Accessed March 2024. https://www.transportation.gov/mission/sustainability/corporate-average-fuel-economy-cafe-standards.

In response to the *Massachusetts v. Environmental Protection Agency* ruling, the George W. Bush administration issued Executive Order 13432 in 2007, directing the USEPA, the US Department of Transportation (USDOT), and the US Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, nonroad vehicles, and nonroad engines by 2008.[21] In 2009, the NHTSA issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.[22]

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles.[23] The proposed standards projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021. On May 2, 2022, NHTSA also finalized fuel economy standards for passenger cars and light trucks for model years 2024–2025 that increase at a rate of 8% per year, and increase at a rate of 10% per year for model year 2026 vehicles. NHTSA currently projects that the revised standards would require an industry fleet-wide average of roughly 49 mpg in model year 2026, and would reduce average fuel outlays over the lifetimes of affected vehicles that provide consumers hundreds of dollars in net savings.[24]

In addition to the regulations applicable to cars and light-duty trucks described above, in 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. If implemented, the Phase 2 standards would be expected to lower CO2 emissions by approximately 1.1 billion metric tons (MT), and save vehicle owners fuels costs of about $170 billion.25 On March 28, 2022, EPA published a proposed rule that would set new, more stringent standards to reduce pollution from heavy-duty

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21 U.S. Government Publishing Office. *Executive Order 13432—Cooperation Among Agencies in Protecting the Environment With Respect to Greenhouse Gas Emissions From Motor Vehicles, Nonroad Vehicles, and Nonroad Engines*. May 14, 2007. Accessed March 2025. https://www.gpo.gov/fdsys/pkg/WCPD-2007-05-21/pdf/WCPD-2007-05-21-Pg631.pdf.

22 United States Environmental Protection Agency. "Regulations for Greenhouse Gas Emissions from Commercial Trucks and Buses." Accessed March 2025. https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-greenhouse-gas-emissions-commercial-trucks.

23 United States Environmental Protection Agency. "Presidential Announcements and Letters of Support Related to Greenhouse Gas Emissions." Accessed March 2025. https://www.epa.gov/regulations-emissions-vehicles-and-engines/presidential-announcements-and-letters-support-related.

24 Federal Register. *Corporate Average Fuel Economy Standards for Model Years 2024–2026 Passenger Cars and Light Trucks*. May 2, 2022. Accessed March 2025. https://www.govinfo.gov/content/pkg/FR-2022-05-02/pdf/2022-07200.pdf.

25 United States Environmental Protection Agency and National Highway Traffic Safety Administration. *Standards to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles*. August 2016.

vehicles and engines starting in model year 2027. The proposed standards would significantly reduce emissions of smog- and soot-forming nitrogen oxides (NOx) from heavy-duty gasoline and diesel engines and set more stringent GHG standards for certain commercial vehicle categories.[26] In July 2025 Congress eliminated civil penalties for non-compliance with CAFE standards for light-duty vehicles, and the Department of Transportation/NHTSA has issued an interpretive rule (Resetting the CAFE Program) explicitly excluding electric-vehicle sales and alternative-fuel sales from compliance calculations.

State

State Senate Bill 1389

SB 1389 requires that the CEC develop an integrated plan for electricity, natural gas, and transportation fuels.[27] The CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The CEC prepares updates to these assessments and associated policy recommendations in alternate years. Preparation of the Integrated Energy Policy Report involves close collaboration with federal, State, and local agencies and a wide variety of stakeholders in an extensive public process to identify critical energy issues and develop strategies to address those issues. The most recently approved report and update, the 2021 Integrated Energy Policy Report Update, addresses the State's implementation of SB 350, integrated resource planning, distributed energy resources, transportation electrification, electricity system resilience and efficiency, barriers faced by disadvantaged communities, demand response, renewable energy, natural gas supplies, preliminary transportation energy demand forecast, and climate adaptation and resiliency.[28]

Renewables Portfolio Standard (RPS)

RPS program was established in 2002 by SB 1078 with the initial requirement that 20% of electricity retail sales must be served by renewable resources by 2017. The program was accelerated in 2015 with SB 350, which mandated a 50% RPS by 2030. SB 350 included interim annual RPS targets with three-year compliance periods and required 65% of RPS procurement to be derived from long-term contracts of 10 or more years. In 2018, SB 100 was signed into law, which again increased the RPS to 60% by 2030 and required all the state's electricity to come from carbon-free resources by 2045. The

26 United States Environmental Protection Agency and National Highway Traffic Safety Administration. "Regulations for Greenhouse Gas Emissions from Commercial Trucks and Buses." Accessed March 2025. https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-greenhouse-gas-emissions-commercial-trucks.

27 Public Resources Code, Sections 25300–25323.

28 California Energy Commission. *2021 Integrated Energy Policy Report*. Accessed March 2025. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report.

most recent RPS-related enactment occurred in 2022; specifically, SB 1020[29] codifies into law a state policy that eligible renewable energy resources and zero-carbon resources supply:

- 90% of all retail sales of electricity to California end-use customers by December 31, 2035,
- 95% by December 31, 2040, and 100% by December 31, 2045; and
- 100% of electricity procured to serve all state agencies by December 31, 2035.

To achieve these objectives, SB 1020 requires that California Air Resources Board (CARB) and the CEC use unspecified programs authorized under existing statutes and employ measures to ensure that implementation of the policy does not cause increases in GHG emissions elsewhere.

The CPUC implements and administers RPS compliance rules for California's retail sellers of electricity, which include large and small investor-owned utilities (IOUs), electric service providers (ESPs) and community choice aggregators (CCAs). The CEC is responsible for the certification of electrical generation facilities as eligible renewable energy resources and adopting regulations for the enforcement of RPS procurement requirements of public owned utilities (POUs).[30]

California Building Standards Code

California Energy Code

California's Energy Efficiency Standards for Residential and Nonresidential Buildings[31] were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the design of building shells and components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

On August 11, 2021, the CEC adopted the 2022 Energy Code. In December, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens

29 California Legislative Information. *Senate Bill No. 1020*. September 19, 2022. Accessed March 2025. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB1020.

30 California Public Utilities Commission. "Renewables Portfolio Standard (RPS) Program." Accessed March 2025. https://www.cpuc.ca.gov/rps/.

31 California Energy Commission. *2019 Building Energy Efficiency Standards*. Accessed March 2025. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.[32]

California Green Building Code

The California Green Building Standards Code, which is Part 11 of the CCR, is commonly referred to as the CALGreen Code (CALGreen).[33] The most current version of the CALGreen building code, the 2022 CALGreen code, went into effect January 1, 2023. The purpose is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, outdoor lighting standards, use and occupancy, location, and maintenance of all building and structures within its jurisdiction.

Transportation Sector Energy Related Regulations

Section 4.8: Greenhouse Gas Emissions of this Draft EIR discusses various statutes that address climate change, which also address energy generation and consumption. As expressed in these statutes, meeting the State's climate change goals requires focused action to quickly transform the State's energy system away from fuels that generate GHGs. The following statutes direct various State agencies to conduct assessments and forecasts that are used to develop recommendations for energy policies and programs that conserve State resources, provide reliable energy, protect the environment, enhance the State's economy, and protect public health and safety.

The State has provided a climate policy portfolio that addresses emissions across sectors including electricity, buildings, transportation, land use and agriculture, and industry. The transportation sector is the largest source of GHG emissions in the State and various State policies call for speeding the transition to zero-emission vehicles (ZEVs), which among other things reduce energy use, including:

- CARB's Scoping Plan, which describes California's approach for achieving its GHG reduction goals. The plan was developed in 2008 and updated in 2014, 2017 and 2022;
- Executive Order B-16-2012 set a goal of reaching 1.5 million ZEVs on California roadways by 2025; and
- Executive Order B-48-18 calls for at least 5 million ZEVs on California roads by 2030 and spurs the installation of 250,000 plug-in electric vehicle chargers, including 10,000 direct fast current chargers, and 200 hydrogen refueling stations by 2025.

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32 California Energy Commission. *2022 Building Energy Efficiency Standards*. Accessed March 2025. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency.

33 California Building Standards Commission. *California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11)*. Accessed March 2025. http://www.bsc.ca.gov/Home/CALGreen.aspx.

Executive Order B-55-18 established a Statewide goal to achieve carbon neutrality by 2045; that goal was subsequently codified by AB 1279 in 2022. Although these statutes are broader than the energy sector, reducing GHG emissions from California's energy system, including transportation, is a fundamental part of the effort to reduce reliance on fossil fuels.

Executive Order S-03-05

Executive Order S-03-05 mandates that California emit 80% fewer GHGs in 2050 than it emitted in 1990. Energy efficiency and reduced vehicle miles traveled (VMT) would play important roles in achieving this goal. As previously mentioned, GHG reduction efforts increase energy efficiency which also reduces the consumption of petroleum-based fuels.

Executive Order S-01-07

Executive Order S-1-07, the Low Carbon Fuel Standard (issued on January 18, 2007), requires a reduction of at least 10% in the carbon intensity of California's transportation fuels by 2020.[34] Regulatory proceedings and implementation of the Low Carbon Fuel Standard have been directed to CARB. The Low Carbon Fuel Standard has been identified by CARB as a discrete early action item in the adopted Climate Change Scoping Plan (discussed below). CARB expects the Low Carbon Fuel Standard to achieve the minimum 10% reduction goal; however, many of the early action items outlined in the Climate Change Scoping Plan work in tandem with one another. Other specific emission reduction measures included are the Million Solar Roofs Program[35] and Assembly Bill (AB) 1493 (Pavley I), Vehicle Emissions: Greenhouse Gases, which establishes motor vehicle GHG emissions standards.[36] To avoid the potential for double-counting emission reductions associated with AB 1493, the Climate Change Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1%. In accordance with the Climate Change Scoping Plan, this analysis incorporates the modified reduction potential for the Low Carbon Fuel Standard. CARB released a draft version of the Low Carbon Fuel Standard in October 2008. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the Low Carbon Fuel Standard became effective on the same day.

In 2018, CARB approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote

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34 State of California, Office of the Governor. *Executive Order S-01-07*. January 18, 2007. Accessed March 2025. https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf.

35 United States Department of Energy. *Laying the Foundation for Solar America: The Million Solar Roofs Initiative*. Accessed March 2025. https://www.nrel.gov/docs/fy07osti/40483.pdf.

36 The standards enacted in Pavley I are the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 and going through 2016. Pavley I could potentially result in 27.7 million metric tons CO_2e reduction in 2020. Pavley II will cover model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tons CO_2e.

zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector.

CARB

In 2012, CARB approved the Advanced Clean Cars (ACC) program, an emissions-control program for passenger vehicles and light-duty trucks for model years 2015–2025, thereby continuing the regulatory framework established under the Pavley standards beyond model year 2016. The program combines the control of smog, soot, and GHG emissions with requirements for greater numbers of zero-emission vehicles. The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[37] Consistent with the other State-reduction policies geared toward reducing GHG emissions, the efforts to speed up integration of ZEVs and PHEVs would reduce the consumption of petroleum based fuels.

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, CCR Section 2485) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This section applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by this class of vehicles.

The Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles (Title 13, CCR Division 3, Chapter 1, Section 2025) was adopted to reduce emissions of diesel particulate matter, oxides of nitrogen (NO_x). and other criteria pollutants from in-use diesel-fueled vehicles. This regulation is phased, with full implementation by 2023, with compliance resulting in this class of vehicles using petroleum-based fuel in a more efficient manner, thereby reducing diesel fuel consumption.

CARB is responsible for enforcing CCR, Title 13, Sections 2449(d)(3) and 2485, which limit idling from both on-road and off-road diesel-powered equipment to no greater than five minutes at any location. Reducing idling of diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by the vehicle.

37 California Air Resources Board. “Advanced Clean Cars Program.” Accessed March 2025. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program.

CARB 2020 Mobile Source Strategy

CARB staff has developed the 2020 Mobile Source Strategy[38] to take an integrated planning approach to identify the level of transition to cleaner mobile source technologies needed to achieve all of California's targets. The actions contained in the Mobile Source Strategy deliver broad environmental and public health benefits, as well as support much needed efforts to modernize and upgrade transportation infrastructure, enhance system-wide efficiency and mobility options, and promote clean economic growth in the mobile sector.

CARB Advanced Clean Cars II

The Advanced Clean Cars II program[39] is designed to take the state's already growing zero-emission vehicle market and robust motor vehicle emission control rules and augment them to meet more aggressive tailpipe emissions standards and ramp up to 100% zero-emission vehicles. Additionally, the program will rapidly scale down light-duty passenger car, truck and SUV emissions starting with the 2026 model year through 2035.

First, the Advanced Clean Cars II program amends the Zero-emission Vehicle Regulation to require an increasing number of zero-emission vehicles, and relies on advanced vehicle technologies, including battery-electric, hydrogen fuel cell electric and plug-in hybrid electric vehicles, to meet air quality and climate change emissions standards. Second, the program amends the Low-emission Vehicle Regulations to include increasingly stringent standards for gasoline cars and heavier passenger trucks to continue to reduce smog-forming emissions while the sector transitions toward 100% electrification by 2035.[40]

CARB Advanced Clean Fleets

CARB is developing a medium and heavy-duty zero-emission fleet regulation with the goal of achieving a zero-emission truck and bus California fleet by 2045 everywhere feasible and significantly earlier for certain market segments such as last mile delivery and drayage applications.[41] The initial focus would be on high-priority fleets with vehicles that are suitable for early electrification, their subhaulers, and entities that hire them. The goal of this effort is to accelerate the number of medium and heavy-duty zero-emission vehicle purchases to achieve a full transition to zero-emission vehicles in California as soon as possible.

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38 California Air Resources Board. "2020 Mobile Source Strategy." Accessed March 2025. https://ww2.arb.ca.gov/resources/documents/2020-mobile-source-strategy.

39 California Air Resources Board. "Advanced Clean Cars I." Accessed March 2025. https://ww2.arb.ca.gov/rulemaking/2022/advanced-clean-cars-ii.

40 California Air Resources Board. "Advanced Clean Cars II." Accessed March 2025. https://ww2.arb.ca.gov/rulemaking/2022/advanced-clean-cars-ii.

41 California Air Resources Board. "Advanced Clean Fleets." Accessed March 2025. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets/about.

CARB In-Use Off-Road Diesel-Fueled Fleets Regulation

The goal of the In-Use Off-Road Diesel-Fueled Fleets Regulation[42] is to reduce particulate matter (PM) and oxides of nitrogen (NOx) emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. The regulation covers a wide scope of vehicle types used in (but not limited to) industries as diverse as construction, air travel, manufacturing, landscaping, and ski resorts. Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

Sustainable Communities Strategy

SB 375, the Sustainable Communities and Climate Protection Act, coordinates land use planning, regional transportation plans, and funding priorities to reduce GHG emissions from passenger vehicles through better-integrated regional transportation, land use, and housing planning that provides easier access to jobs, services, public transit, and active transportation options. These actions achieve their objectives in part through increased energy efficiency. Specific to energy conservation, electric vehicles, natural gas vehicles, and transit/rail, more compact development patterns that reduce vehicle travel also demand less energy per capita. Reducing vehicle travel also reduces energy related to producing and distributing of fuels and vehicles, as well as the construction and maintenance of roads.

California Environmental Quality Act (CEQA)

In accordance with Appendix F and G of the CEQA Guidelines, and in order to ensure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potential significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.[43] The 2020 update to Appendix G of the CEQA Guidelines now provides that if a project would result in potentially significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or obstruct a State or local plan for renewable energy or energy efficiency, then an EIR shall be prepared for the project that includes mitigation measures for that energy use. The EIR's analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size,

42 California Air Resources Board. "In-Use Off-Road Diesel-Fueled Fleets Regulation." Accessed March 2025. https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation/about.

43 Public Resources Code, Section 21100(b)(3).

location, orientation, equipment use, and any renewable energy features that could be incorporated into the project as further described below under Appendix F of the CEQA Guidelines.

Appendix F of the CEQA Guidelines provides a list of energy-related topics that may be discussed in an EIR, where topics are applicable or relevant to the project, including:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources; and
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Regional

Southern California Association of Governments (SCAG)

The SCAG 2024–2045 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) (Connect SoCal)[44] is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving a 19% reduction by 2035, and 21% reduction by 2040, compared to the 2005 level. Although Connect SoCal is not technically an energy efficiency plan, consistency with Connect SoCal has energy implications, including the reduction of VMT which reduces GHG emissions and has the co-benefit of reducing fossil fuel consumption from travel to and from a project.

Local

City of Oxnard Climate Action and Adaptation Plan (CAAP)

The CAAP establishes a goal to reduce GHG emissions 40% below 1990 levels by 2030 and describes actions for the City to reduce emissions.[45] The CAAP includes GHG reduction strategies across seven major categories: 1) clean energy; 2) green building; 3) transportation; 4) land use; 5) water conservation and reuse; 6) waste reduction; and 7) recycling and nature based solutions. Although

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44 Southern California Association of Governments. *Connect SoCal (2024–2045 Regional Transportation Plan/Sustainable Communities Strategy)*. Accessed April 2024. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-ch-05-measuring-our-progress-040424.pdf.

45 City of Oxnard. *Climate Action and Adaptation Plan*. Accessed August 2024. https://www.oxnard.gov/wp-content/uploads/Oxnard-CAAP_2022-12-07_Adopted-1.pdf.

the CAAP is not technically a GHG reduction plan, many of the actions described in the plan would have the co-benefit of also reducing energy demand.

City of Oxnard General Plan

The City's General Plan contains goals and policies to guide decision making in the City for day-today and long-term strategic planning and operations in the City. The following City of Oxnard General Plan policies and goals are applicable to energy.

Goal SC-3: Energy efficiency performance standards and generation from renewable sources.

Policy SC-3.7: ***Renewable Energy Production Requirement.***

As part of the City and Community EAP's, require that master planned commercial and industrial developments incorporate solar, wind, and other renewable energy generation and transmission equipment unless demonstrated to the satisfaction of a qualified renewable energy consultant to be infeasible.

Policy SC-3.9: ***Promote Voluntary Incentive Programs.***

Promote voluntary participation in incentive programs to increase the use of solar photovoltaic systems in new and existing residential, commercial, institutional and public buildings, including continued participation in the Ventura County Regional Energy Alliance.

Policy SC-3.10: ***Alternatives to Power Plant Generation.***

Evaluate the feasibility of incorporating alternative sources of power generation such as wind and tidal power into the regional existing power supply grid to reduce reliance on GHG emission producing public utility and privately-owned power plants.

Goal SC-4: Implementation of the California Green Building Code.

Policy SC-4.1: ***Green Building Code Implementation.***

Implement the 2010 CALGREEN and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.

Goal CD-5: Development of industrial uses in appropriate areas, assistance in the location of new industry, retention and expansion of existing industry, and maintenance of the City's economic vitality.

Policy CD-5.3: ***Available Services.***

Encourage industrial activities to locate where municipal services are available including adequate storm drainage and water facilities, as well as easy access to multiple modes of transportation.

Policy CD-5.4: ***Environmentally Friendly and "Green" Industry.***

Seek to attract industrial development that avoids or minimizes substantial pollution, noise, glare, odor, use of hazardous materials, or other offensive activity and/or is a component of the emerging Green industry.

Goal CD-8: Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.

Policy CD-8.10: ***Timing of Large-Scale Development.***

Consider at an early stage the infrastructure investment needs of large-scale developments in order to evaluate these needs as part of long-range water supply, conveyance, wastewater, and other relevant planning.

Goal CD-16: Coordinated land use and infrastructure decisions with economic development.

Policy CD-16.4 ***Evaluate Fiscal Impacts.***

Evaluate the fiscal impacts of new development and encourage a pattern of development that allows the City to provide and maintain a high level of urban services (fire and police services, water, sewer, solid waste, transportation, parks, etc.) and community facilities as well as attract targeted businesses and a stable labor force.

Policy CD-21.2: ***Modify non-Coastal Dependent Energy Uses.***

When the LCP is being updated, clarify that non Coastal-dependent energy facilities are not allowed in the Energy Coastal zone with exceptions for renewable energy installations such as solar panels and wind turbines under certain conditions and consistent with the Coastal Act.

Goal ICS-1: Provision of adequate facilities and services that maintain service levels, with adequate funding.

Policy ICS-1.2: ***Development Impacts to Existing Infrastructure.***

Review development proposals for their impacts on

infrastructure (e.g., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.

Goal ICS-17: Adequate and efficient public utilities that meet the needs of residents of the City.

Policy ICS-17.5: ***Undergrounding of Utility Lines.***

Require undergrounding of utility lines in new development, except where it is not feasible due to electrical transmission load or other operational issues.

4.6.3 Significance Thresholds

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

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

4.6.4 Methodology

Construction

Energy use for the construction of Del Sol High School, Area B, was previously analyzed in the Oxnard Union High School District New High School No. 8 Environmental Impact Report (OUHSD EIR).[46] The OUHSD EIR concluded that during the construction of Del Sol High School, energy consumption will result primarily from fuel used to power off-road construction equipment, material delivery and removal trucks, and vehicles used by employees to travel to the job site.[47] 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 and inefficient equipment. There are no identified aspects of the construction of Del Sol High School that would incur unnecessary or inefficient use of energy. Thus, the construction of the proposed project is not anticipated to result in wasteful, inefficient or unnecessary use of energy.[48] As such, construction for Area B is not further analyzed below.

Construction energy consumption would result from transportation fuels (e.g. petroleum) used for haul trucks, heavy-duty construction equipment, construction workers traveling to and from the

46 Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*.

47 Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*.

48 Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*.

proposed Project, electricity consumed to convey water for dust control, and any electrically driven construction equipment.

Construction activities could vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors that would travel to the proposed Project. This analysis considered these factors and provided the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources. The anticipated construction schedule is discussed in **Section 2.0**: **Project Description**.

Construction fuel use was estimated by assuming a conservative estimate of construction activities and applying mobile source emission factors. Construction of the proposed Project includes construction in both Area A and Area C. Both areas were conservatively assumed to be developed at the same time. Construction in Area A would include four primary phases: Grading, Building Construction, Paving, and application of Architectural Coatings (e.g., paint), while Area C would include five phases: Demolition, Grading, Building Construction, Paving, and Architectural Coating. Construction electricity use was estimated based on electricity that would be used in association with the conveyance of water used for dust control, and on a limited basis, powering lights during each construction phase. The CalEEMod emissions model, described further in **Section 4.3: Air Quality** of this Draft EIR, was used to estimate the proposed Project's emissions of criteria air pollutants. The same model used for air quality analyses was also used for the purpose of estimating energy use.

Electricity

Electricity from water conveyance for dust control was also calculated based on the estimated exposed area and water needs to cover the area during construction activity. Default CalEEMod water electricity intensity factors were used to convert the volume of water needed to electricity demand from water conveyance.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas is not expected to be consumed in large quantity during Project construction. Therefore, natural gas associated with construction activities was not calculated.[49]

[49] In general, natural gas would not be expected to be used and this energy analysis assumes heavy-duty construction equipment is diesel-fueled, as is typically the case. However, natural gas-fueled heavy-duty construction equipment could be used to replace some diesel-fueled heavy-duty construction equipment. If this does occur, diesel fuel demand would be slightly reduced and replaced by a small amount of temporary natural gas demand. This would not substantially affect the energy analysis or conclusions provided herein.

Transportation Fuels

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour from CARB's off-road vehicle (OFFROAD) model. Fuel consumption from construction on-road worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the emissions modeling worksheets and CalEEMod construction output files. Total VMT for these on-road vehicles were then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's Emission Factor (EMFAC) model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. CalEEMod assumed trip lengths were used for worker commutes while vendor, management visits, concrete, and haul truck trips were taken from emissions modeling worksheets that used EMFAC emission factors. Consistent with CalEEMod, construction worker trips were assumed to include a mix of light duty gasoline automobiles and light duty gasoline trucks. Construction vendor trucks were assumed to be a mix of medium-heavy-duty and heavy-duty diesel trucks and concrete and haul trucks were assumed to be heavy-duty diesel trucks.

The energy usage required for Project construction has been estimated based on the number and type of construction equipment that would be used during Project construction by assuming a conservative estimate of construction activities (i.e., maximum daily equipment usage levels). Energy for construction worker commuting trips has been estimated based on the predicted number of workers for the various phases of construction and the estimated VMT based on the conservative values in the CalEEMod and EMFAC models. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulatory requirements that would minimize the amount of energy usage during construction.

The construction equipment and haul trucks would likely be diesel-fueled, while the construction worker commute vehicles would primarily be gasoline-fueled. For the purposes of this assessment, it is conservatively assumed that all heavy-duty construction equipment and haul trucks would be diesel-fueled. The estimated fuel economy for heavy-duty construction equipment is based on fuel consumption factors from the CARB OFFROAD emissions model, which is a State-approved model for estimating emissions from off-road heavy-duty equipment. The estimated fuel economy for haul trucks and worker commute vehicles is based on fuel consumption factors from the CARB EMFAC emissions model, which is a State-approved model for estimating emissions on-road vehicles and trucks. Both OFFROAD and EMFAC are incorporated into CalEEMod. However, fuel consumption for worker, vendor, and concrete/haul trucks were calculated outside of CalEEMod using emission factors from EMFAC to provide a more detailed and accurate account of truck fuel consumption.

Operation

Operational emissions were based on the full buildout of the Project, accounting for the operation of 950 residential dwelling units, 40,000 square feet of commercial uses, parks, and Del Sol High School operating at full capacity of 2,500 students.

Electricity

The Project's estimated electricity demand was analyzed relative to SCE existing and planned energy supplies in 2033 (i.e., the Project buildout year) to determine if the utility would be able to meet the Project's energy demands. Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) from Project operation was calculated using demand factors provided in CalEEMod based on Title 24 standards. Energy usage from water demand (e.g., electricity used to supply, convey, treat, and distribute) was estimated based on new buildings and facilities. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulations and its land use transportation characteristics that would minimize the amount of energy usage during operations.

Natural Gas

The Project's estimated natural gas demand was analyzed relative to SoCalGas' existing and planned energy supplies in 2033 (i.e., the Project buildout year) to determine if the utility would be able to meet the Project's energy demands.

Transportation Fuels

Energy for transportation from trips associated with the proposed uses are estimated based on the predicted number of trips to and from the Project Site. The transportation fuel demand associated with trips from the Project was accounted for in the Project's operational transportation fuel demand for the purposes of this energy analysis.

4.6.5 Project Impacts

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

Less than Significant Impact.

The proposed Project would allow the development of up to 950 residential dwelling units, a maximum of 40,000 square feet of retail and general commercial space, and public parks. As the proposed Project would increase development intensity of the Project Site compared to existing conditions, demand for energy resources, including electricity, natural gas, and fuel for vehicles used by residents and their guests, would increase.

Construction

Project construction would consume energy in two general forms: fuel energy consumed by construction vehicles and equipment; and bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. Construction of the proposed Project would involve on-site energy demand and consumption related to the use of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction equipment. Project construction methods would be typical of current construction practices and would not require the use of more energy intensive machinery or higher than normal volumes of trucks and worker vehicle trips.

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Compliance with anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would the use of haul trucks with larger capacities.

Construction of the proposed Project would require the use of various forms of energy. **Table 4.6-3: Summary of Fuel Use During Construction** summarizes the quantity of petroleum fuels that would be consumed during construction. As shown in **Table 4.6-3**, 786,731 gallons of fuel would be used during construction. Additionally, approximately 517.6 kWh of electricity would be used during construction for water conveyance for dust control, and on limited basis, may be used to power lighting.

TABLE 4.6-3: SUMMARY OF FUEL USE DURING CONSTRUCTION

Fuel Type	Quantity
Area A	
Off-Road Construction Equipment	108,650 gallons
Construction Worker	398,699 gallons
Construction Vendor (MDH & HHD Trucks)	125,034 gallons
Construction Hauling	57,521 gallons
Area C	
Off-Road Construction Equipment	26,513 gallons
Construction Worker	49,016 gallons
Construction Vendor (MDH & HHD Trucks)	14,147 gallons
Construction Hauling	7,151 gallons
Total	**786,731 gallons**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E**.

Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Fuel consumed by construction equipment was evaluated with the following assumptions:

- Construction schedule of 69 months for Area A and 21 months for Area C
- All construction equipment was assumed to run on diesel fuel.
- Typical daily use of eight (8) hours, with some equipment operating from approximately one (1) to seven (7) hours.
- Aggregate fuel consumption rate for all equipment was estimated at 18.5 horsepower hours per gallon (hp-hr/gal).[50]
- Diesel fuel would be the responsibility of the equipment operators/contractors and would be sourced within the region.
- Project construction represents a "single-event" for diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources during long-term operation.

Using the CalEEMod data input for the air quality and greenhouse gas analyses, the Project's construction phase would consume electricity and fossil fuels as a single energy demand; that is, once construction is completed their use would cease. CARB's 2024 Emissions Factors Tables show that, on average, aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr/gal.

Construction Worker Fuel Estimates

It is assumed that construction worker trips range from light-duty autos (LDA), light duty truck 1 (LDT1), and light duty truck 2 (LDT2) at a mix of 25%, 50%, and 25%, respectively, along area roadways.[51] Data regarding Project-related construction worker trips were based on CalEEMod model defaults.

Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analyses using information generated from CARB's 2021 EMFAC (see **Appendix E** for data). An aggregate fuel efficiency of 26.02 miles per gallon (mpg) was used to calculate VMT for construction worker trips. **Table 4.6-3** shows that an estimated 447,715 gallons (398,699 gallons during Area A and 49,016 gallons during Area C) of fuel would be consumed for construction worker trips.

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50 California Air Resources Board. *Carl Moyer Program Guidelines*, "Table 30: Fuel Consumption Rate Factors (bhp-hr/gal)," 2024. Accessed November 2025. https://ww2.arb.ca.gov/guidelines-carl-moyer.

51 CalEEMod User's Guide Appendix C (April 2022) states that construction work trips are made by a fleet consisting of 25% light-duty auto (or passenger car), 50% light-duty truck type 1 (LDT1), and 25% light-duty truck type 2 (LDT2).

Construction Vendor/Hauling Fuel Estimates

Data regarding Project-related construction worker trips is based on CalEEMod model defaults. For architectural coatings, it is assumed that contractors would be responsible for bringing coatings and equipment with them in their light-duty vehicles. Therefore, vendors delivering construction material or hauling debris from the site during grading and building construction would use medium- to heavy-duty vehicles with an average fuel consumption of 7.75 mpg for medium-duty trucks and 6.05 mpg for heavy-duty trucks.[52] **Table 4.6-3** shows that an estimated 203,853 gallons (182,555 gallons during Area A and 21,298 gallons during Area C) of fuel would be consumed for vendor and hauling trips.

Construction Energy Efficiency/Conservation Measures

Construction equipment used over the approximately 69 months of construction would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy-intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). The Project would utilize construction contractors which practice compliance with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted Airborne Toxic Control Measures[53] to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. Compliance with these measures would result in a more efficient use of construction-related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additionally, as required by California Code of Regulations (CCR) Title 13–Motor Vehicles, Section 2449(d)(3) Idling, idling times of construction vehicles are limited to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by County of Ventura (County) building officials, and/or in response to citizen complaints.

With adherence to applicable regulations regarding energy efficiency/conservation measures, the proposed Project would not result in potentially significant environmental impact due to wasteful,

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52 CalEEMod User's Guide Appendix C (April 2022) states that vendor trips are made by a fleet consisting of 50% medium trucks (MHDT) and 50% heavy trucks (HHDT), and that hauling and on-site truck trips are made by a fleet consisting of 100% HHDT.

53 California Air Resources Board. "Airborne Toxic Control Measures." Accessed July 2024. https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures.

inefficient, or unnecessary consumption of energy resources, during project construction, resulting in less than significant impacts.

Operation

Energy consumption in support of, or related to, Project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project Site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

Transportation Fuel Consumption

Operations-related fuel consumption was calculated using the annual VMT from the air quality and greenhouse gas analyses' CalEEMod output, and using information generated from CARB's 2021 EMFAC model. **Table 4.6-4: Proposed Project Estimated Vehicle Operations Fuel Consumption** shows that an estimated 327,057 gallons of gasoline and 55,174 gallons of diesel fuel would be consumed per year for the operation of buildout that would result from the development of the proposed Project.

Trip generation and VMT generated by the proposed Project are consistent with other similar commercial uses of similar scale and configuration as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). That is, the proposed Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. Furthermore, the County of Ventura is estimated to consume approximately 410 thousand gallons of diesel and 2.5 billion gallons of gasoline in 2025.[54] Therefore, the increase in fuel consumption from the proposed Project is insignificant in comparison to the County's demand. As such, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

TABLE 4.6-4: PROPOSED PROJECT ESTIMATED VEHICLE OPERATIONS FUEL CONSUMPTION

Land Use	Annual VMT	Gasoline Usage (gallons)	Diesel Usage (gallons)
Del Sol High School	8,127,222	229,411	38,701
Apartment Low Rise	2,868,602	80,973	13,660
Retail	590,666	16,673	2,813
Total	**11,586,490**	**327,057**	**55,174**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

54 California Air Resources Board. "EMFAC Emissions Inventory." Accessed September 2025. https://arb.ca.gov/emfac/emissions-inventory.

Facility Energy Demands (Electricity and Natural Gas)

Building operation and site maintenance (including landscape maintenance) would result in the consumption of electricity (provided by SCE) and natural gas (provided by SoCalGas). The annual natural gas and electricity demands are contained in the CalEEMod output are provided in **Table 4.6-5: Proposed Project Annual Operational Energy Demand Summary**. As shown, the estimated electricity demand for the proposed Project is approximately 6.33 million (6.3 GWh) per year. In 2022, SCE consumed 85870 GWh of electricity,[55] and SCE estimates that electricity consumption within its planning area will be approximately 126,111 GWh annually by 2033, when the Project would be fully built out.[56] The Project would account for less than 0.01% of the 2033 annual consumption in SCE's planning area. As such, the Project would account for a negligible portion of the projected annual consumption in SCE's planning area.

TABLE 4.6-5: PROPOSED PROJECT ANNUAL OPERATIONAL ENERGY DEMAND SUMMARY

Land Use	Electricity (kWh/yr)	Water Usage		Water-Related Electricity Use (kWh/yr)	Total Annual Electricity Use (kWhr)	Total Annual Natural Gas Use (kBTU/yr)
		Indoor (gal/yr)	Outdoor (gal/yr)			
Del Sol High School	1,710,370	11,440,596	28,580,043	229,522	1,939,892	1,710,370
Apartment Low Rise	3,722,453	36,008,254	1,591,094	253,551	3,976,004	17,263,206
Retail	390,812	2,962,901	51,710	20,443	411,255	239,192
Park	0	0	0	0	0	0
Total	**5,823,635**	**50,411,751**	**30,222,847**	**503,515.2**	**6,327,150**	**20,833,118**

Notes: kWh/yr = kilowatt-hours per year; kBtu/yr = thousand British Thermal Units per year.

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study.* **Appendix E.**

The estimated natural gas consumption for the proposed Project is approximately 20.8 million kBTU (20.4 MMcf) per year. SoCalGas consumed 5,026 million Therms (5,020,600 MMcf) of natural gas in 2022.[57] Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas supply within SoCalGas' planning area will be approximately 1.38 million MMcf

55 California Energy Commission. "Electricity Consumption by Entity." Accessed March 2025. https://ecdms.energy.ca.gov/elecbyutil.aspx.

56 California Energy Commission. "California Energy Demand 2023–2040, CED 2023 Baseline Forecast – SCE." Accessed September 2024. https://www.energy.ca.gov/data-reports/reports/2023-integrated-energy-policy-report/2023-iepr-workshops-notices-and-2.

57 California Energy Commission. "Gas Consumption by Entity."

per year in 2032.[58] The proposed Project would account for less than 0.01% of the 2032 annual forecasted supply in SoCalGas' planning area.

Accordingly, electricity and natural gas demand during operation would not result in wasteful, inefficient, or unnecessary consumption. Impacts would be less than significant.

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

Less than Significant Impact.

California Building Standards Code

As a matter of regulatory compliance, the proposed Project is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Code which have been incorporated into the City's Municipal Code as amended by Section 14-6.[59]

SCAG RTP/SCS (Connect SoCal)

The Connect SoCal includes the specific goal of achieving a 19% reduction by 2035, and 21% reduction by 2040, compared to the 2005 level. Consistency with the Connect SoCal has energy implications, including the reduction of VMT which reduces GHG emissions and has the co-benefit of reducing fossil fuel consumption from travel to and from a project. As discussed further in **Section 4.8: Greenhouse Gas Emissions**, the proposed Project would be consistent with the policies applicable to individual development projects in the 2024-2050 Connect SoCal. The proposed Project would be served by the City's existing transportation network, including Gold Coast Transit, which has stops for multiple bus routes within 0.5 miles of the Project Site including #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). The Project Site is also served by Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol. The Project would also comply with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CAL Green standards.

City of Oxnard Climate Action and Adaptation Plan

As discussed previously, the City's CAAP[60] includes outlines goals, strategies, and actions for the City's future, in order to reduce the City's GHG emissions that contribute to climate change. Action

58 California Gas and Electric Utilities. *2024 California Gas Report*.

59 City of Oxnard. Municipal Code, *Section 14-6*.

60 City of Oxnard. *Climate Action and Adaptation Plan*. Accessed August 2024. https://www.oxnard.gov/wp-content/uploads/Oxnard-CAAP_2022-12-07_Adopted-1.pdf.

items focus on reducing GHG emissions using strategies and actions organized into seven major categories: clean energy, green buildings, transportation, land use, water conservation and reuse, waste reduction and recycling, and nature-based solutions. Actions that would result in the reduction of GHG emissions would also result in more efficient energy use and energy savings. As discussed further in **Section 4.8: Greenhouse Gas Emissions**, the proposed Project would be consistent with the applicable strategies in the City's CAAP. The Project would incorporate water conservation features, such as low-flow fixtures, required pursuant to the current California Plumbing Code and CALGreen. Furthermore, current CALGreen requirements require a 20% increase in indoor water use efficiency relative to previous building requirements. The Project would also be designed and operated to meet the applicable requirements of CALGreen requirements for electrification of new buildings.

As detailed above, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, resulting in less than significant impacts.

4.6.6 Cumulative Impacts

The City's 2030 General Plan EIR determined that while new development allowed by the General Plan would increase energy demand within the City, individual development and infrastructure projects would require evaluation of potential impacts on an individual based. Impacts under the General Plan with regard to energy were determined to be less than significant due to applicable policies that would be required by individual development to encourage energy efficiency.

As detailed above, the proposed Sub-Neighborhood Plan would not result in significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, maintenance. The Project would be consistent with the City's CAAP and would not obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Project would not contribute to any significant cumulative impacts.

4.6.7 Level of Significance Without Mitigation

Impacts would be less than significant without mitigation.

4.6.8 Mitigation Measures

No mitigation measures are required.

4.6.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

4.7 GEOLOGY AND SOILS

This section describes the existing geological and soils conditions within the Project Site and evaluates potential impacts related to these conditions. As discussed in the Initial Study (**Appendix A**), impacts associated with the following Thresholds were determined to have no impact: a(iv) landslides and e) alternative wastewater disposal systems were identified during preliminary review of the Project. Therefore, further detailed evaluation is not provided for these topics because the Project will not create significant impacts in those areas. This section incorporates information from the Geotechnical Feasibility Study (Geotechnical Report) (**Appendix L**) prepared for the Project Site by Advanced Geotechnical Services, Inc. (AGS) which describes potential geological hazards associated with the Project Site and recommendations to ensure the Project is developed in a manner consistent with applicable safety standards to avoid significant impacts.[1]

4.7.1 Existing Conditions

Geology

The Project Site is located within the Oxnard Plain of the Central Ventura Basin within the Western Transverse Ranges geomorphic province of California. The Project Site is within the Oxnard USGS 7.5-minute quadrangle. Based on the *Geologic Map of the 7.5-Minute Oxnard* Quadrangle, the Project Site is underlain by Holocene wash alluvial deposits (Qhw2) and Holocene Alluvial Deposits (Qha2), which was confirmed during site investigations conducted for the Geotechnical Report.

Faulting

Southern California is a tectonically active region subject to hazards associated with earthquakes and faulting. Faults are classified as either Holocene active, pre-Holocene active, or age undetermined. Active Holocene faults are defined by the State of California as faults that have exhibited surface displacement within the last 11,700 years. Alquist-Priolo Earthquake Fault Zones are zones established by the State that contain Holocene active surface fault traces, and a fault investigation is required for projects that are located within these zones if active faulting affects the site. The Project Site is not located in an Alquist-Priolo Earthquake Fault Zone, and thus no fault investigation is required for the Project.

Earth Materials and Subsurface Conditions

Earth materials and subsurface conditions were determined by conducting exploratory borings extending from 20 feet to 51.5 feet below ground surface (bgs) and cone penetration test (CPT) soundings extending from 35 to 70.5 bgs. There are two units of native alluvium mapped throughout the site: Holocene wash alluvial deposits (Qhw2) consisting of unconsolidated poorly sorted silty sands, and Holocene Alluvial Deposits (Qha2) associated with overbank deposits including scour,

[1] Advanced Geotechnical Services, Inc. *Preliminary Geotechnical Feasibility Study for the Proposed Tentative Tract No. 6059, Maulhardt/Stiles Ranch*. February 2025.

incising, and channeling. The earth materials in the upper 4 to approximately 10 feet were generally slightly moist to moist, and ranged from loose to dense, and fine- to coarse-grained sand and silty sand.

The Geotechnical Report determined that the soil within the Project Site has low potential for hydroconsolidation and overall compressibility and low expansion. Hydroconsolidation refers to the settling of certain types of soils when they become saturated with water, and compressibility describes how much soil can be compressed underweight; low ratings for both mean the soil is relatively stable under building loads. Low expansion means the soil does not significantly swell when wet, which reduces the risk of movement that could affect building foundations. Groundwater was encountered at depths approximately 18.5 feet to 27.5 feet bgs.

Geologic Hazards

Liquefaction Potential

According to the State of California *Seismic Hazard Zones Map* of the Oxnard Quadrangle, the Project Site is located in an area designated as being potentially liquefiable. Liquefaction is a phenomenon where saturated soil temporarily behaves like a liquid during strong shaking, such as an earthquake, causing the ground to lose strength and potentially shift or settle. Liquefaction potential depends on soil type, age of materials, density, depth to groundwater, shaking intensity and confining pressures over the potentially liquefiable soil mass. Geologically young sediments (Pleistocene to recent) coupled with a shallow groundwater table (less than 50 feet) are conditions which are indicative of an elevated liquefaction potential.

Based on the soil composition from CPT soundings and the relatively shallow groundwater that has been previously recorded (shallowest recording at 8 feet bgs) and the existing groundwater height (18.5 to 27.5 feet bgs), risk for seismically-induced liquefaction on the Project Site ranges from low to high depending on localized soil conditions and groundwater depth.

Settlement

Settlement is the gradual sinking or compression of the ground that happens under the weight of new structures or from the addition of new fill materials. Due to the composition of soils and relatively shallow groundwater, the potential for settlement within the Project Site is considered moderate to high.[2]

Lateral Spreading

Seismically induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking in conjunction with liquefaction. Lateral spreading can manifest as near-vertical cracks with predominantly horizontal movement of the soil mass involved towards an adjacent open

2 Advanced Geotechnical Services, Inc. *Preliminary Geotechnical Feasibility Study for the Proposed Tentative Tract No. 6059, Maulhardt/Stiles Ranch*.

slope face, or gently sloping ground. These ground deformations can adversely damage the buildings and cause connecting services to be completely severed.

Based on the ground surface gradient of less than approximately 0.35% and data from the exploratory borings and other investigations the potentially liquefiable layers are laterally discontinuous and, for this reason, the Project Site is considered to have a low risk of lateral spreading.

Paleoenvironment

Based on published mapping, the Project Site overlies young Holocene alluvium of the Oxnard Plain that is expected to be underlain at depth by older, fossiliferous Pleistocene deposits (older alluvium and the San Pedro Formation).[3,4] Holocene deposits generally have low paleontological sensitivity at shallow depths, whereas the underlying Pleistocene units have moderate to high sensitivity.

4.7.2 Regulatory Framework

Federal

U.S. Geological Survey Landslide Hazard Program

The USGS created the Landslide Hazard Program in fulfillment of the requirements of Public Law 106-113. The Federal Emergency Management Agency (FEMA) is the responsible agency for the long-term management of natural hazards. The federal government takes the lead role in funding and conducting research, whereas the reduction of losses due to geologic hazards is primarily a state and local responsibility.

Occupational Safety and Health Administration Regulations

Excavation and trenching are among the most hazardous construction operations. The Occupational Safety and Health Administration (OSHA) Excavation and Trenching Standard (29 Code of Federal Regulations 1926.650) covers requirements for excavation and trenching operations. OSHA requires that all excavations in which employees could potentially be exposed to cave-ins be protected by sloping or benching the sides of the excavation and work area. In California, the California Occupational Safety and Health Administration (Cal/OSHA) has the responsibility of implementing federal rules relevant to worker safety, including slope protection during construction excavations. Cal/OSHA's requirements are more restrictive and protective than federal OSHA standards.

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3 United States Geological Survey (USGS). *Geologic Map of the Oxnard 7.5-Minute Quadrangle, Ventura County, California*. 2003. Accessed August 2024. https://ngmdb.usgs.gov/Prodesc/proddesc_78382.htm.

4 USGS. *Scientific Investigations Map 3225*. 2012. Accessed August 2024. https://pubs.usgs.gov/sim/3225/sim3225_sheet10.pdf.

State

Alquist-Priolo Earthquake Fault Zoning Act (1972)

The Alquist-Priolo Earthquake Fault Zoning (AP) Act,[5] passed into law on February 9, 1971, provides a mechanism for reducing losses from surface fault rupture and ensure public safety on a statewide basis by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults.

The Project Site is not located within an Alquist-Priolo Fault Zone.

Seismic Hazard Mapping Act (SHMA) (1990)

The Seismic Hazard Mapping Act (Public Resources Code Chapter 7.8, Sections 2690-2699.6), adopted by the state for the purpose of protecting public safety from the effects of earthquake hazards from non-surface fault rupture. The CGS prepares and provides local governments with seismic hazard zones maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazards zones are referred to as "zones of required investigation" because site-specific geological investigations are required for construction projects located within these areas. Before a project can be permitted, a geologic investigation, evaluation, and written report must be prepared by a licensed geologist to demonstrate that proposed buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy must be set back from the fault (generally 50 feet [ft]).

California Building Code (2022)

Adopted via CCR Title 24, Part 2, the California Building Code (CBC), provides minimum standards for building design in the State.[6] The procedures and limitations for the design of structures are based on-site characteristics, occupancy type, configuration, structural system height, and seismic zoning. Seismic ratings from the CBC divide the United States into four geographical zones. The Project Site is located in a region where higher seismic design requirements apply, generally corresponding to Seismic Design Category (SDC) D or higher, reflecting the potential for strong ground shaking. Construction activities are subject to occupational safety standards for excavation, shoring, and

5 California Public Resources Code, Sections 2621 et seq.

6 California Building Standards Commission. *California Building Code, Title 24, Part 2 (2022)*. Accessed August 2024. https://codes.iccsafe.org/content/CABC2022P1.

trenching as specified in California Occupational Safety and Health Administration (Cal/OSHA) regulations in California Code of Regulations, Title 8, Chapter 4, Subchapter 4, Article 6.[7]

California Health and Safety Code, Sections 17922 and 17951-17958.7 of the California Health and Safety Code

These rules require cities and counties to adopt and enforce the current edition of the CBC,[8] including a grading section. The City and County have adopted and enforce these provisions. Sections of Volume 2 of the CBC specifically apply to select geologic hazards. Chapter 16 of 2167 CBC addresses requirements for seismic safety. Chapter 18 regulates excavation, foundations, and retaining walls. Chapter 33 contains specific requirements pertaining to site demolition, excavation, and construction.

Administrative Code, Title 14, Section 4307

Administrative Code, Title 14, Section 4307 prohibits individuals from removing, injuring, defacing, or destroying any object of paleontological, archaeological, or historical interest or value.

Local

City of Oxnard General Plan

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

GOAL SH-1 Minimal damage to structures, property, and infrastructure as a result of liquefaction and subsidence.

Policy.SH_7¡7. Minimize.Liquefaction.Risk

Ensure that structures for human occupancy are only constructed or placed on a potential liquefaction site if the approved geological report shows that an acceptable hazard risk would be created and/or required mitigation measures are met.

Policy.SH_7¡8. Minimize.Subsidence.Trends

Avoid increases in the level of groundwater extraction as a method for meeting new water demands if the extraction leads to subsidence, or unless a comprehensive reinjection program is approved and implemented to offset extractions.

7 State of California Department of Industrial Relations. *Cal/OSHA Title 8 Regulations*. Accessed August 2024. https://www.dir.ca.gov/samples/search/query.htm.

8 California Building Standards Commission. *California Building Code, Title 24, Part 2 (2022)*.

Policy.SH‗7¡9. **Building.Code.Standards**

Require that all new buildings and alterations to existing buildings be built according to the seismic requirements adopted within the most current City of Oxnard Building Code, or its adopted equivalent.

Policy.SH‗7¡0. **Soil?Geologic?and.Structural.Evaluation.Reports**

Require that adequate soils, and geologic and structural evaluation reports be prepared by registered soils engineers, engineering geologists, and/or structural engineers, as appropriate, for applicable development.

Policy.SH‗7¡❶. **Required.Geologic.Reports**

Continue to require the submission of a geological report for proposed development located in a potential liquefaction area.

Policy.SH‗7¡❸. **Soil.Investigations**

Continue to require a complete site-specific soils investigation that addresses liquefaction and compressible soil characteristics and identifies construction techniques or other mitigation measures to prevent significant impacts upon the proposed development.

Policy.SH‗7¡❹. **Mitigating.Seismic.Hazards**

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

Goal SH-3 New development required to take necessary precautions prior to any construction to mitigate hazards and protect the health and safety of the inhabitants.

Policy.SH‗9¡7. **Location.of.New.Development**

Encourage new development to avoid areas with high geologic, tsunami, flood, beach erosion, and fire or airport hazard potential.

4.7.3 Significance Thresholds

a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo

Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

b. Result in substantial soil erosion or the loss of topsoil?

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

4.7.4 Methodology

As described above, this section incorporates information from the Geotechnical Report prepared for the proposed Project. This report includes and addresses:

a. Site observation and review of geotechnical and geologic data of the general study area;

b. Review of previous site-specific geotechnical studies prepared for the Project Site and adjacent properties;

c. Reconnaissance of the Project Site and the immediate vicinity of the Project Site;

d. Drilling, sampling, and logging of ten (10) small diameter hollow-stem auger borings to depths between approximately 20 feet to 51.5 feet below the existing ground surface; and advancing 16 CPT soundings to depths between approximately 35 feet to 70.5 feet below the existing ground surface;

e. Laboratory testing of selected samples to determine the engineering properties of on-site soils;

f. Determination of seismic parameters for potential on-site ground motion, in accordance with the 2022 California Building Code;

g. Engineering analysis of the data and information obtained from our field study, laboratory testing, and literature review;

h. Development of preliminary, feasibility level geotechnical recommendations for site preparation and grading, and preliminary, feasibility level geotechnical design criteria for building foundations, floor slabs, underground utility trenches, temporary excavations, pavement, and drainage for the proposed development;

4.7.5 Project Impacts

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist or based on other substantial evidence of a known fault?

Less than Significant Impact .

The Geotechnical Report identifies that the Project Site is not located in an Alquist-Priolo Earthquake Fault Zone. Therefore, there would be less than significant impacts regarding rupture of an Alquist-Priolo Earthquake Fault Zone.

ii) Strong seismic groundshaking?

Less than Significant Impact with Mitigation Incorporated.

Although no known active surface fault traces traverse through the Project Site, like most of Southern California, the Project Site lies within a seismically active region. However, the proposed Project would be developed in accordance with the latest CBC standards and would incorporate the seismic design requirements identified in the Geotechnical Report prepared for the Project Site as required by mitigation measure **MM GEO-1** to reduce potential impacts from strong seismic ground shaking to less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact with Mitigation Incorporated.

As discussed above, due to the composition of the alluvium soil and the relatively shallow groundwater on the Project Site, there are portions of the Project Site that have potentially high liquefaction risks. To ensure the structural integrity of the Project Site, the Project will conform to the seismic design requirements as outlined in the CBC, which contains site preparation standards and foundation design requirements that would address any potential liquefaction hazards. The agency that enforces the CBC is the City Planning and Environmental Services Department, which reviews applications for building permits for compliance with the CBC, local amendments to the CBC, and development regulations for the City's Zoning Ordinance.

The proposed Project would also incorporate the design recommendations identified in the Geotechnical Report prepared for the Project Site as required by mitigation measure **MM GEO-1** to reduce potential impacts to less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact.

Development of the proposed Project would require grading and earthwork activities that could potentially cause soil erosion or the loss of topsoil. As described in **Section 3.10: Hydrology and Water Quality,** the proposed Project would be required to implement best management practices (BMPs) according to the General Construction Permit to prevent significant soil erosion and loss of topsoil during construction of the Project. Once developed, the Project Site would operate with drainage control features adhering to the Municipal Separate Storm Sewer Systems (MS4) Permit such that the potential for soil erosion or loss of topsoil would be minimized during operation of the proposed Project. This would reduce potential impacts to less than significant.

c) Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact with Mitigation Incorporated.

As described above, the Project Site has a low risk of lateral spreading due to the relatively flat gradient. However, due to the composition of the alluvium soil and the relatively shallow groundwater, the Project Site has a high potential for subsidence, liquefaction, and collapse. The proposed Project would be developed in accordance with the latest CBC standards and would incorporate the design recommendations identified in the Geotechnical Report prepared for the Project Site as required by mitigation measure **MM GEO-1** to reduce potential subsidence, liquefaction, and collapse impacts to less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than Significant Impact with Mitigation Incorporated.

The alluvium soil on the Project Site has clayey characteristics that could also be moisture-sensitive to relatively shallow groundwater, which could potentially result in soil expansion. The proposed Project would be developed in accordance with the latest CBC standards and would incorporate the design recommendations identified in the Geotechnical Report prepared for the Project Site as required by mitigation measure **MM GEO-1** to reduce potential risks associated with expansive soil on the Project Site to less than significant.

f) Directly or indirectly destroy a unique paleontological resource site or unique geologic feature?

Less than Significant Impact with Mitigation Incorporated.

As discussed above, the Project Site overlies young Holocene alluvium of the Oxnard Plain that is expected to be underlain at depth by older, fossiliferous Pleistocene deposits (older alluvium and the San Pedro Formation). Holocene deposits generally have low paleontological sensitivity at shallow depths, whereas the underlying Pleistocene units have moderate to high sensitivity.

Therefore, ground disturbance confined to artificial fill and very shallow native soils is unlikely to encounter significant fossils, but deeper excavation and trenching into native alluvium at depth could encounter paleontological resources. Implementation of **MM GEO-2** requires a qualified paleontologist to conduct monitoring during ground disturbing activities. If unanticipated paleontological resources are encountered during project grading and subsurface excavation, then all work in that area shall be halted or diverted away from the immediate area of the discovery until the paleontologist can evaluate the nature and/or significance of the find(s). Implementation of this measure will reduce potential impacts to less than significant.

4.7.6 Cumulative Impacts

The Oxnard 2030 General Plan EIR determined that regional development would increase the number of people and structures subject to geologic and soil related risks. The policies and implementation programs included as part of implementation of the General Plan, along with compliance with federal, State, and local regulations addressing building construction, run-off and erosion, would reduce these potential impacts to a less than significant. Development in other communities in Ventura County would also be required to comply with federal, state, and local regulations that are designed to protect increases in people and structures from hazards related to such issues as earthquakes, landslides, and soil erosion. As a result, conformance with adopted California building codes, and other measures to protect people and structures from geologic hazards, would reduce potential cumulative impacts to a less than significant.

The proposed Project would not cause significant geology and soil and paleontological resource impacts with the implementation of **MM GEO-1** and **MM GEO-2**. Potential impacts from future development in the Project area would be addressed on a case-by-case basis, subject to CEQA review as part of future discretionary permits, and appropriate mitigation would be designed to mitigate impacts resulting from individual projects. Therefore, the Project would not contribute to any significant cumulative impacts.

4.7.7 Level of Significance Without Mitigation

Impacts would be significant without mitigation measures.

4.7.8 Mitigation Measures

MM GEO-1 In order to provide more uniform foundation support for development of the proposed Project, the following measures, as further detailed in the Preliminary Geotechnical Feasibility Study for the Proposed Tentative Tract No. 6059, Maulhardt/Stiles Ranch, shall be included in the design of buildings:

i. Over-excavation and replacement of the near surface soils with a shallow geogrid-reinforced gravel raft and engineered fill;

ii. Vibro stone columns;

iii. A rammed aggregate pier system; and/or

iv. A rapid impact compaction program.

It should be noted that final ground improvement and foundation design recommendations shall comply with the current California Building Code and shall be subject to review and approval by a state-licensed geotechnical engineer or engineering geologist during final design.

MM GEO-2 Paleontological Monitoring Plan and Monitoring

A qualified project paleontologist shall prepare a paleontological monitoring plan and will be present on-site during ground disturbing activities in the case of unanticipated discovery of potential paleontological resources. If unidentified paleontological resources are encountered during construction within the Project Site, then the archaeologist will have the authority to halt work within 50 feet of the area until the project paleontologist can assess the find; determine its potential for significance; and develop measures to eliminate adverse impacts.

4.7.9 Level of Significance After Mitigation

Potentially significant impacts would be mitigated to less than significant with implementation of **MM GEO-1** and **MM GEO-2**.

4.8 GREENHOUSE GAS EMISSIONS

This section provides a discussion of global climate change, existing regulations pertaining to climate change, an inventory of the greenhouse gas (GHG) emissions that would result from the Project, and an analysis of the potential impact of those GHGs. Emission calculations for the Project are contained in **Appendix E**: **Air Quality, Greenhouse, and Energy Study** of this EIR.

4.8.1 Background

Global Context

GHGs are global pollutants that have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere for a long enough time to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule depends on multiple variables and cannot be pinpointed, more CO_2 is currently emitted into the atmosphere than is avoided or sequestered. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through photosynthesis and dissolution, respectively. The is estimated to absorb approximately 31% of the CO_2 emissions released into the atmosphere.[1]

Similarly, the effects of GHGs are borne globally (sea-level rise, hurricanes, droughts, etc.), as opposed to the localized air quality effects of criteria air pollutants and toxic air contaminants (TACs). The quantity of GHGs that it takes to ultimately result in climate change is not precisely known, but that quantity is enormous. No single project would be expected to measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or microclimates. However, it is the combined GHG contributions per project that create an impact.

Greenhouse Gas Effects

GHGs play a critical role in determining the Earth's surface temperature because these gases absorb solar radiation.[2] Solar radiation enters the Earth's atmosphere from space. A portion of the radiation is absorbed by the Earth's surface, and a smaller portion of this radiation is reflected back into space. The radiation absorbed by the Earth is reradiated as lower-frequency infrared radiation, which is then selectively absorbed by GHGs in the Earth's atmosphere. As a result, the greater the amount of GHGs in the atmosphere, the greater the amount of infrared radiation trapped, resulting in a warming of the atmosphere. This phenomenon is commonly referred to as the "greenhouse effect."[3] Scientists have

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1 National Centers for Environmental Information. Quantifying the Ocean Carbon Sink. https://www.ncei.noaa.gov/news/quantifying-ocean-carbon-sink#:~:text=Changing%20Ocean%20Chemistry,and%20international%20partners%20in%20Science. Accessed August 2024.

2 United States Environmental Protection Agency (USEPA). Climate Change Indicators: Climate Forcing. https://www.epa.gov/climate-indicators/climate-change-indicators-climate-forcing. Accessed October 2025.

3 USEPA. Greenhouse Gases (last updated June 17, 2025). https://www.epa.gov/report-environment/greenhouse-gases. Accessed October 2025.

speculated that increased GHG emissions from human activity (anthropogenic) could lead to a less habitable climate. Anthropogenic GHG emissions leading to atmospheric levels in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of warming of the Earth's atmosphere and oceans, with corresponding effects on global air and water circulation patterns and climate. CO_2 emissions associated with fossil fuel combustion are the primary contributors to human-induced emissions.[4]

Climate Change Effects for California

Climate change could affect environmental conditions in California in a variety of ways. One effect of climate change is rising sea levels. Sea levels along the California coast rose approximately 7 inches during the last century, and they are predicted to rise an additional 7 to 22 inches by 2100, depending on the future levels of GHG emissions.[5] The effects of a rise in sea level could include increased coastal flooding, saltwater intrusion (especially a concern in the low-lying Sacramento–San Joaquin Delta, where pumps delivering potable water to Southern California could be threatened), and disruption of wetlands.

As the State's climate changes over time, the range of various plant and wildlife species could shift or be reduced, depending on the favored temperature and moisture regimes of each species. In the worst cases, some species would become extinct or be extirpated from the State if suitable conditions are no longer available. Additional concerns associated with climate change include a reduction in the snowpack, leading to less overall water storage in the mountains (the largest "reservoir" in the State), and increased risk of wildfires caused by changes in rainfall patterns and plant communities. Changes in the climate can also impact California's weather patterns and rainfall, causing droughts in certain areas and flooding in others.

Sources of Greenhouse Gas Emissions

GHGs are the result of both natural and anthropogenic activities.[6] With respect to anthropogenic activities, motor vehicle travel, air travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfire are the primary sources of GHG emissions.[7] Additionally, land use decisions and future development projects pursuant to implementation of a general plan can affect the generation of GHG emissions from multiple sectors,

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4 USEPA. Climate Change Indicators: Greenhouse Gases (last updated August 1, 2025). https://www.epa.gov/climate-indicators/greenhouse-gases. Accessed October 2025.

5 California Natural Resource Agency. 2009 California Climate Adaptation Strategy (Dec. 2009). https://resources.ca.gov/CNRALegacyFiles/docs/climate/Statewide_Adaptation_Strategy.pdf. Accessed October 2025.

6 USEPA. Climate Change Indicators: U.S. Greenhouse Gas Emissions (Mar. 26, 2025). https://www.epa.gov/climate-indicators/climate-change-indicators-us-greenhouse-gas-emissions. Accessed October 2025.

7 USEPA. Sources of Greenhouse Gas Emissions (last updated Mar. 31, 2025). https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions. Accessed October 2025. Please note that while wildfires are generally acknowledged to emit GHGs, they are not categorized by the U.S. EPA as an anthropogenic source.

resulting in direct or indirect GHG emissions. For example, electricity consumed in the lighting and heating of buildings is an indirect source of GHG emissions because it requires electricity from power plants, which emit GHGs directly into the atmosphere.[8] Conversely, tailpipe emissions from the use of vehicles generate direct GHG emissions.[9]

GHGs are a group of emissions that include CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, and nitrogen trifluoride (NF_3).[10] Carbon dioxide is the most important and largest contributor to climate change.[11] As stated above, other GHGs are less abundant, but have higher global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2; denoted as CO_2e. A general description of GHGs discussed is provided in **Table 4.8-1: Description of Identified Greenhouse Gases**.

TABLE 4.8-1: DESCRIPTION OF IDENTIFIED GREENHOUSE GASES

GHG	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG that has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and the main component of natural gas. When one molecule of CH4 is burned in the presence of oxygen, one molecule of CO2 and two molecules of water are released. A natural source of CH4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH4 or ethane (C2H6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the

8 USEPA. Commercial and Residential Sector Emissions (last updated Mar. 31, 2025). https://www.epa.gov/ghgemissions/commercial-and-residential-sector-emissions. Accessed October 2025.

9 USEPA. Smog Vehicle Emissions (last updated Apr. 18, 2025). https://www.epa.gov/greenvehicles/smog-vehicle-emissions. Accessed October 2025.

10 USEPA. Overview of Greenhouse Gases (last updated Jan. 16, 2025). https://www.epa.gov/ghgemissions/overview-greenhouse-gases. Accessed October 2025.

11 USEPA. Carbon Dioxide Emissions (last updated February 13, 2025). https://www.epa.gov/ghgemissions/carbon-dioxide-emissions. Accessed October 2025.

TABLE 4.8-1: DESCRIPTION OF IDENTIFIED GREENHOUSE GASES

GHG	General Description
	production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorinated Chemicals (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conduction manufacturing.
Sulfur Hexafluoride (SF6)	An inorganic, odorless, colorless, nontoxic, and nonflammable gas. SF6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF3)	An inorganic, nontoxic, odorless, nonflammable gas. NF3 is used in the manufacture of semiconductors, as an oxidizer of high energy fuels, for the preparation of tetrafluoro hydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

Notes:

a *GHGs identified in this table are ones identified in the Kyoto protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.*

Sources:

United Nations, Kyoto Protocol to the United Nations Framework Convention on Climate Change. (1997).
Intergovernmental Panel on Climate Change. Fifth Assessment Report (AR5). (2014).

Existing Conditions

State Emissions

California is the second largest contributor of GHGs in the United States and the 16th largest in the world.[12] In 2022, California produced 371.1 million metric tons of carbon dioxide equivalents ($MMTCO_2e$), including imported electricity, and excluding combustion of international fuels and carbon sinks or storage.[13] The major source of GHGs in California is transportation, contributing to approximately 38% of the State's total GHG emissions.[14] The Statewide inventory of GHGs by sector is shown in **Table 4.8-2: California GHG Inventory 2014–2022.**

12 California Energy Commission (CEC). Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, Staff Final Report. December 2006. https://cetesb.sp.gov.br/inventario-gee-sp/wp-content/uploads/sites/34/2014/04/161.pdf. Accessed December 2024.

13 California Air Resources Board (CARB). California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators (Sept. 20, 2024). https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf. Accessed October 2025.

14 CARB. GHG Current California Emission Inventory Data. Accessed December 2024. https://ww2.arb.ca.gov/ghg-inventory-data.

TABLE 4.8-2: CALIFORNIA GHG INVENTORY 2014–2022									
	Emissions ($MMTCO_2e$)								
Main Sector	2014	2015	2016	2017	2018	2019	2020	2021	2022
Transportation	157.5	161.1	164.8	166.0	164.8	161.7	135.2	145.1	139.9
Industrial[a,b]	90.3	86.3	70.8	64.4	65.0	60.2	59.5	62.3	59.8
Electric Power	85.0	82.7	81.3	81.7	82.3	80.9	73.6	74.2	72.7
Commercial and Residential	35.5	37.2	37.7	38.3	37.5	40.6	39.0	38.8	39.5
Agriculture	33.7	32.5	32.1	31.6	32.0	31.2	31.4	30.4	29.8
High GWP[c,d]	17.9	18.8	19.5	20.1	20.6	20.8	21.3	21.3	21.3
Recycled and waste	8.2	8.1	7.9	8.2	8.2	8.3	8.5	8.3	8.2
Total Emissions	**428.1**	**426.8**	**414.1**	**410.3**	**410.5**	**403.7**	**368.5**	**380.4**	**371.1**

Notes: $MMTCO_2e$ – million metric tons of carbon dioxide equivalent emissions.

[a] *Includes equipment used in construction, mining, oil drilling, industrial and airport ground operations.*

[b] *Reflects emissions from combustion of natural gas, diesel, and lease fuel plus fugitive emissions.*

[c] *These categories are listed in the Industrial sector of CARB's GHG Emission Inventory sectors.*

[d] *This category is listed in the Electric Power sector of CARB's GHG Emission Inventory sectors.*

[e] *The exceptional Aliso Canyon natural gas leak event released 1.96 $MMTCO_2e$ of unanticipated emissions in calendar year 2015 and an additional 0.53 $MMTCO_2e$ in 2016. These emissions will be mitigated in the future according to legal settlement and are presented alongside but tracked separately from routine inventory emissions.*

Source: CARB. GHG Current California Emission Inventory Data. Accessed December 2024. https://ww2.arb.ca.gov/ghg-inventory-data.

City of Oxnard Emissions

In 2020, the City completed an inventory of emissions for the year 2010, representing the earliest year for which the necessary data was available, and for the year 2018, representing the most recent year for which data was available. **Table 4.8-3: City of Oxnard Community GHG Emissions** summarizes the results of the 2010 and 2018 community inventory broken down by major sector (i.e., category of emissions that is defined by the end use that causes them, such as transportation), and shows the change from 2010 to 2018.

TABLE 4.8-3: CITY OF OXNARD COMMUNITY GHG EMISSIONS				
Sector	Emissions ($MMTCO_2e$)			
	2010	2018	Absolute Change	Percent Change
On-Road Transportation	428,030	389,079	-38,951	-9%
Electricity	252,511	207,472	-45,039	-18%
Natural Gas	215,922	165,692	-50,230	-23%
Solid Waste	64,564	68,411	3,848	6%
Off-Road Equipment	28,394	37,310	8,916	31%
Wastewater	6,432	4,769	-1,663	-26%
Passenger Rail	2,353	2,137	-217	-9%
Water	1,583	1,271	-312	-10%

TABLE 4.8-3: CITY OF OXNARD COMMUNITY GHG EMISSIONS				
Sector	Emissions ($MMTCO_2e$)			
	2010	2018	Absolute Change	Percent Change
Total	**999,788**	**876,140**	**-123,648**	**-12%**

Source: City of Oxnard Climate Action and Adaptation Plan, Table 2-1.

Table 4.8-4: City of Oxnard, GHG Emissions from Municipal summarizes the results for the 2010 and 2018 municipal operations inventories, listed by sector and showing the change from 2010 to 2018. Note that municipal operations represent a subset of community emissions, and they are included in the total emissions shown in **Table 4.8-3** above. The municipal operations inventory, provided in **Table 4.8-4**, demonstrates a detailed look at the emission sources over which the City has the most control or influence. Overall, annual emissions have dropped by more than 21% from 2010 to 2018. The biggest reductions are from electricity use, wastewater treatment, and water treatment and delivery. Emissions from natural gas and solid waste increased, though their contributions to overall emissions remained very small.

TABLE 4.8-4: CITY OF OXNARD, GHG EMISSIONS FROM MUNICIPAL OPERATIONS				
Sector	Emissions ($MMTCO_2e$)			
	2010	2018	Absolute Change	Percent Change
On-Road Fleet	6,338	5,491	-847	-13.4%
Electricity	11,409	7,586	-3,824	-33.5%
Natural Gas	901	1,224	323	35.9%
Solid Waste	1,937	2,052	115	6.0%
Off-Road Fleet	999	897	-101	-10.1%
Wastewater Treatment	6,363	4,734	-1,626	-25.6%
Water Treatment & Delivery	1,583	1,271	-312	-19.7%
Employee Commute	540	476	-64	-11.9%
Total	**30,070**	**23,731**	**-6,339**	**-21.1%**

Source: City of Oxnard Climate Action and Adaptation Plan, Table 2-2.

The Business as Usual (BAU) forecast for Oxnard, as shown in **Table 4.8-5: City of Oxnard Community GHG Emissions BAU Forecasts**, shows that by 2030, annual community GHG emissions would be approximately 948,847 MTCO2e, an increase from the City's 2018 emissions, but representing a 5% reduction from 2010. By 2050, annual community GHG emissions are expected to increase to approximately 1,086,277 MTCO2e under BAU conditions, representing a 9% increase from 2010.

TABLE 4.8-5: CITY OF OXNARD COMMUNITY GHG EMISSIONS BAU FORECASTS				
Sector	Emissions ($MMTCO_2e$)			
	2010	2018	2030	2050
On-Road Transportation	428,030	389,079	421,902	476,608
Electricity	252,511	207,472	227,193	260,068
Natural Gas	215,922	165,692	183,175	220,400
Solid Waste	64,564	68,411	74,172	83,801
Off-Road Equipment	28,394	37,310	34,264	36,216
Wastewater	6,432	4,769	5,171	5,841
Passenger Rail	2,353	2,1337	1,378	1,556
Water	1,583	1,271	1,581	1,786
Total	**999,788**	**876,140**	**948,847**	**1,086,277**

Source: City of Oxnard Climate Action and Adaptation Plan, Table 2-4.

Existing Emissions

The Project Site contains vacant, undeveloped land that has been subject to previous disturbance, an existing home, additional residential units and accessory buildings associated with past agricultural use, and an existing high school. Structures on site are vacant other than Del Sol High School, which is operating at half capacity with freshman and sophomores attending. The current conditions of Del Sol High School were used to estimate the current on-site greenhouse gas emissions generated from existing operations related to these uses. The existing greenhouse gas emissions were estimated using the most recent version of the California Emissions Estimator Model (CalEEMod). **Table 4.8-6: Existing Operational GHG Emissions** identifies the emissions from the existing high school.

TABLE 4.8-6: EXISTING OPERATIONAL GHG EMISSIONS	
Source	$MTCO_2e$ per year
Mobile	1,713
Energy	511
Area	2
Water	17
Waste	71
Total	**2,314**

Notes: $MTCO_2e$ = metric tons of carbon dioxide emissions.

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

4.8.2 Regulatory Framework

Federal

Federal climate and GHG policies in the United States continue to evolve as administrations adopt and revise regulatory programs addressing vehicle emissions, fuel economy standards, and energy efficiency. In recent years, federal actions have modified or rescinded certain regulatory approvals that previously allowed states, including California, to implement more stringent vehicle emission standards under the Clean Air Act. These actions have introduced regulatory uncertainty regarding the implementation of certain transportation related GHG reduction programs, including regulations adopted by the California Air Resources Board to accelerate the deployment of zero emission vehicles. Because federal and state regulatory actions related to GHG emissions continue to evolve and are subject to ongoing rulemaking and legal review, the regulatory programs summarized below describe the federal framework governing greenhouse gas regulation and vehicle emissions standards as they currently exist or have historically informed climate policy in the United States.

Federal Clean Air Act (CAA)

The US Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*[15] that carbon dioxide (CO_2) and other GHGs are pollutants under the CAA, which the US Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare.[16] The Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that the USEPA could avoid taking action if it found that GHGs do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHGs contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHGs contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171.[17] The USEPA stated that high atmospheric levels of GHGs "are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes." The USEPA further found that "atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act." The final rule was effective on January

15 *Massachusetts v. Environmental Protection Agency*. 127 S.Ct. 1438 (2007). https://www.oyez.org/cases/2006/05-1120. Accessed August 2024.

16 Perry W. Payne and Sara Rosenbaum. *Massachusetts et al. v Environmental Protection Agency: Implications for Public Health Policy and Practice*. Public Health Reports 122 No. 6 (2007): 817–819. https://doi.org/10.1177/003335490712200614. Accessed August 2024.

17 Federal Register. Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act (December 15, 2009). https://www.federalregister.gov/documents/2009/12/15/E9-29537/endangerment-and-cause-or-contribute-findings-for-greenhouse-gases-under-section-202a-of-the-clean. Accessed August 2024.

14, 2010.[18] While these findings alone did not impose any requirements on industry or other entities, this action was a prerequisite to regulatory actions by the USEPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

The USEPA promulgated a regulation to require reporting of all GHG emissions from all sectors of the economy. The final rule applies to fossil fuel suppliers and industrial gas suppliers, direct greenhouse gas emitters and manufacturers of heavy-duty and off-road vehicles and engines. The rule does not require control of greenhouse gases; rather, it requires only that sources above certain threshold levels monitor and report emissions.[19]

Corporate Average Fuel Economy (CAFE) Standards

In response to the *Massachusetts v. Environmental Protection Agency*, President George W. Bush's administration issued Executive Order 13432 in 2007, directing the USEPA, the US Department of Transportation (USDOT), and the US Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, nonroad vehicles, and nonroad engines by 2008.[20] In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.[21]

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles.[22] The proposed standards projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model

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18 USEPA. Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act. https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean/. Accessed August 2024.

19 Federal Register. Mandatory Reporting of Greenhouse Gases (October 30, 2009). https://www.gpo.gov/fdsys/pkg/FR-2009-10-30/pdf/E9-23315.pdf. Accessed August 2024.

20 US Government Publishing Office, Administration of George W. Bush. Executive Order 13432—Cooperation Among Agencies in Protecting the Environment With Respect to Greenhouse Gas Emissions From Motor Vehicles, Nonroad Vehicles, and Nonroad Engines, 631 (May 14, 2007). https://www.gpo.gov/fdsys/pkg/WCPD-2007-05-21/pdf/WCPD-2007-05-21-Pg631.pdf. Accessed August 2024.

21 USEPA. Regulations for Greenhouse Gas Emissions from Commercial Trucks & Buses (December 27, 2017). https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-greenhouse-gas-emissions-commercial-trucks. Accessed August 2024.

22 USEPA. Presidential Announcements and Letters of Support related to Greenhouse Gas Emissions (August 28, 2017). https://www.epa.gov/regulations-emissions-vehicles-and-engines/presidential-announcements-and-letters-support-related. Accessed August 2024.

years 2017–2021, and NHTSA intends to set standards for model years 2022 – 2025 in a future rulemaking. On April 2, 2018, the USEPA signed the Mid-term Evaluation Final Determination, which found that the model year 2022–2025 greenhouse gas standards are not appropriate and should be revised.[23] The Final Determination serves to initiate a notice to further consider appropriate standards for model year 2022–2025 light duty vehicles. On August 24, 2018, the USEPA and NHTSA published a proposal to freeze the model year 2020 standards through model year 2026 and to revoke California's waiver under the Clean Air Act to establish more stringent standards.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. If implemented, the Phase 2 standards would be expected to lower CO2 emissions by approximately 1.1 billion metric tons (MT), save vehicle owners fuels costs of about $170 billion.[24] But as discussed above, the USEPA and NHTSA have proposed to roll back GHG and fuel economy for cars and light-duty trucks, which suggest a similar rollback of Phase 2 standards for medium and heavy-duty vehicles may be pursued.

In March 2020, the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, issued by NHTSA and EPA, set fuel economy and carbon dioxide standards that increase 1.5% in stringency each year from model years 2021 through 2026.[25]

In February 2022, the USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards. This final rule revises current GHG standards beginning with vehicles in model year 2023 through model year 2026, and it established the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.[26]

In July 2025 Congress eliminated civil penalties for non-compliance with CAFE standards for light-duty vehicles, and the Department of Transportation/NHTSA has issued an interpretive rule

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23 Federal Register. Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022 – 2025 Light-Duty Vehicles, April 13, 2018. https://www.federalregister.gov/documents/2018/04/13/2018-07364/mid-term-evaluation-of-greenhouse-gas-emissions-standards-for-model-year-2022-2025-light-duty. Accessed August 2024.

24 USEPA. EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond. https://www.nhtsa.gov/sites/nhtsa.gov/files/detailed-fact-sheet.pdf. Accessed August 2024.

25 U.S. Department of Transportation. Mar. 31, 2020: NHTSA and EPA finalize CAFE and carbon dioxide emissions standards for model years 2021-2026. Mar. 31, 2020: NHTSA and EPA finalize CAFE and carbon dioxide emissions standards for model years 2021-2026. Accessed August 2024.

26 USEPA. Federal Register Vol. 86, No. 248, Rules and Regulations. Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards. https://www.govinfo.gov/content/pkg/FR-2021-12-30/pdf/2021-27854.pdf. Accessed August 2024.

(Resetting the CAFE Program) explicitly excluding electric-vehicle sales and alternative-fuel sales from compliance calculations.

Energy Independence and Security Act of 2007 (EISA)

EISA facilitates the reduction of national GHG emissions by requiring the following:[27]

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of renewable fuel in 2022, with at least 16 billion gallons from cellulosic biofuels and a cap of 15 billion gallons for corn-starch ethanol;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25% greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200% greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks; and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks, and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[28]

State

California Air Resources Board (CARB)

Climate Change Scoping Plan

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) on December 11, 2008, as required by AB 32. The 2008 Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[29] The 2008 Scoping Plan had a range of GHG reduction actions, including direct regulations;

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27 USEPA. Summary of the Energy Independence and Security Act. https://www.epa.gov/laws-regulations/summary-energy-independence-and-security-act. Accessed August 2024.

28 A green job, as defined by the United States Department of Labor, is a job in business that produce goods or provide services that benefit the environment or conserve natural resources.

29 CARB. *Climate Change Scoping Plan: A Framework for Change*. https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 2024.

alternative compliance mechanisms; monetary and non-monetary incentives; voluntary actions; market-based mechanisms, such as a cap-and-trade system; and an AB 32 implementation regulation to fund the program.

The 2008 Scoping Plan called for a "coordinated set of strategies" to address all major categories of GHG emissions.[30] Transportation emissions were to be addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard,[31] and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to implement energy efficiency practices. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard. This will be complemented with emphasis on local generation, including rooftop photovoltaics and solar hot water installations. Additionally, the 2008 Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas would be accomplished through improving energy efficiency.

CARB updated the 2008 Scoping Plan in May 2014 (2014 Scoping Plan). The 2014 Scoping Plan[32] adjusted the 1990 GHG emissions levels to 431 million metric tons of carbon dioxide equivalents ($MMTCO_2e$); the updated 2020 GHG emissions forecast is 509 $MMTCO_2e$, which credited for certain GHG emission reduction measures already in place (e.g., the Renewables Portfolio Standards (RPS). The 2014 Scoping Plan also recommended a 40% reduction in GHG emissions from 1990 levels by 2030, and a 60% reduction in GHG emissions from 1990 levels by 2040.

CARB again updated the 2014 Scoping Plan,[33] approved on December 14, 2017 (2017 Scoping Plan), which builds on previous programs, and takes aim at the 2030 target established by the SB 32 (Pavley), which is further discussed below. The 2017 Scoping Plan outlines options to meet California's aggressive goals to reduce GHGs by 40% below 1990 levels by 2030. In addition, the plan incorporates the State's updated RPS requiring utilities to procure 50% of their electricity from renewable energy sources by 2030. It also raises the State's Low Carbon Fuel Standard[34] and aims

30 CARB. *Climate Change Scoping Plan*. p. ES-7. https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 2024.

31 Office of the Governor. *Executive Order S-01-07*. (January 18, 2007). https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf. Accessed August 2024.

32 CARB. *First Update to the Climate Change Scoping Plan: Building on the Framework*. https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 2024.

33 CARB. *California's 2017 Climate Change Scoping Plan*. https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf. Accessed August 2024.

34 State of California, Office of the Governor. *Executive Order S-01-07*.

to reduce emissions of methane and hydrofluorocarbons by 40% from 2013 levels by 2030 and emissions of black carbon by 50% from 2013 levels.

The 2017 Scoping Plan was again updated and[35] approved in December 2022 (the 2022 Scoping Plan) and is the most comprehensive and far-reaching scoping plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85% below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40% below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[36] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

As discussed above, jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas).[37]

Cap-and-Trade Program

The Climate Change Scoping Plan identified a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80% reduction from 1990 levels by 2050. Under the Cap-and-Trade Program, an overall limit on GHG emissions from capped sectors was established, and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program[38] pursuant to its authority under AB 32. The Cap-and-Trade Program was designed to reduce GHG emissions from public and private

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35 CARB. *2022 Scoping Plan Documents*. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents#:~:text=The%202022%20Scoping%20Plan%20for,directed%20by%20Assembly%20Bill%201279. Accessed August 2024.

36 CARB. *California's 2017 Climate Change Scoping Plan*.

37 CARB. Table 1 of Appendix D. *2022 Scoping Plan Update*. November 2022.

38 California Code of Regulations 17. Sections 95800–96023.

major sources (deemed covered entities) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandates. The statewide cap for GHG emissions from the capped sectors[39] (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program's duration.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of permissible emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 $MTCO_2e$ per year must comply with the Cap-and-Trade Program.[40] Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).[41]

Each covered entity with a compliance obligation is required to surrender "compliance instruments"[42] for each $MTCO_2e$ of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), and can buy allowances at auction, purchase allowances from others, or purchase offset credits. The Cap-and-Trade Regulation provides a firm cap, ensuring that the statewide emission limits will not be exceeded.

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.[43] Accordingly, for projects that are subject to CEQA, GHG emissions associated with electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[44]

The Program applies to emissions that cover approximately 80% of the State's GHG emissions. Demonstrating the efficacy of AB 32 policies, California achieved its 2020 GHG Reduction Target four

39 California Code of Regulations 17. Sections 95811, 95812.

40 California Code of Regulations 17. Section 95812.

41 California Code of Regulations 17. Sections 95100–95158.

42 Compliance instruments are permits to emit, the majority of which will be "allowances," but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.

43 California Code of Regulations 17. Section 95811(b).

44 California Code of Regulations 17. Sections 95811. 95812(d).

years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is a covered sector in the Cap-and-Trade Program.

AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade Program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

Advanced Clean Cars Regulations (ACC)

In 2012, CARB approved ACC program, a new emissions-control program for vehicle model years 2017–2025. The program combines the control of smog, soot, and GHGs with requirements for a greater number of zero-emission vehicles. By 2025, when the rules will be fully implemented, automobiles will emit 34% fewer global warming gases and 75% fewer smog-forming emissions.[45]

Executive Orders

Executive Order S-3-05

Executive Order S-3-05, signed by Governor Arnold Schwarzenegger and issued in June 2005, proclaimed that California is vulnerable to the impacts of climate change.[46] It declared that increased temperatures could reduce the Sierra snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established the following total GHG emission targets:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80% below 1990 levels.

However, in adopting the California Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32 (Pavley), discussed below, the Legislature did not adopt the 2050 horizon-year goal from Executive Order No. S-3-05 and, in the 2006 legislative session, rejected legislation to enact the Executive Order's 2050 goal.

Executive Order S-01-07

Executive Order S-1-07, the Low Carbon Fuel Standard (issued on January 18, 2007), requires a reduction of at least 10% in the carbon intensity of California's transportation fuels by 2020.[47]

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45 CARB. The Advanced Clean Cars Program (January 18, 2018). https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program. Accessed August 2024.

46 State of California, Office of the Governor. *Executive Order S-3-05*. https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf. Accessed August 2024.

47 State of California, Office of the Governor. *Executive Order S-01-07* (January 18, 2007). https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf. Accessed August 2024.

Regulatory proceedings and implementation of the Low Carbon Fuel Standard have been directed to the CARB. CARB has identified the Low Carbon Fuel Standard as a discrete early action item in the adopted Climate Change Scoping Plan (discussed below). CARB expects the Low Carbon Fuel Standard to achieve the minimum 10% reduction goal; however, many of the early action items outlined in the Climate Change Scoping Plan work in tandem with one another. Other specific emission reduction measures included are the Million Solar Roofs Program[48] and Assembly Bill (AB) 1493 (Pavley I), Vehicle Emissions: Greenhouse Gases, which establishes motor vehicle GHG emissions standards.[49] To avoid the potential for double-counting emission reductions associated with AB 1493, the Climate Change Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1%. In accordance with the Climate Change Scoping Plan, this analysis incorporates the modified reduction potential for the Low Carbon Fuel Standard. CARB released a draft version of the Low Carbon Fuel Standard in October 2008. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the Low Carbon Fuel Standard became effective on the same day.[50]

Executive Order B-30-15

Executive Order B-30-15, signed by Governor Edmund Gerald "Jerry" Brown and issued on April 29, 2015, established a new Statewide policy goal to reduce GHG emissions to 40% below their 1990 levels by 2030. Reducing GHG emissions by 40% below 1990 levels in 2030, and by 80% below 1990 levels by 2050 (consistent with Executive Order S-3-05), aligns with scientifically established levels needed to limit global warming to less than 2 degrees Celsius.[51] Executive Order B-30-15 also directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons (MMT) of CO_2e.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter.[52] Based on this executive order, CARB would work with

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48 US Department of Energy. *Laying the Foundation for Solar America: The Million Solar Roofs Initiative*. https://www.nrel.gov/docs/fy07osti/40483.pdf. Accessed August 2024.

49 The standards enacted in Pavley I are the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 and going through 2016. Pavley I could potentially result in 27.7 million metric tons CO2e reduction in 2020. Pavley II will cover model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tons CO2e.

50 CARB. *Supplement to the Final Statement of Reasons (2010)*. https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2009/lcfs09/lcfssupprev.pdf. Accessed October 2025.

51 State of California, Office of the Governor. *Governor Brown Established Most Ambitious Greenhouse Gas Reduction Target in North America (April 29, 2015)*. https://www.ca.gov/archive/gov39/2015/04/29/news18938/index.html. Accessed August 2024.

52 State of California, Office of the Governor. *Executive Order No. B-55-18* (Sept. 10, 2018). https://efiling.energy.ca.gov/GetDocument.aspx?DocumentContentId=68701&tn=235752. Accessed October 2025.

relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal as well as ensuring future scoping plan identify and recommend measures to achieve the carbon neutrality goal.

Assembly Bill 32 and Related Legislation

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. To achieve these goals, which are consistent with the California Climate Action Team, which works to coordinate statewide efforts to implement global warming emission reduction programs and the state's Climate Adaptation Strategy after the passing of AB 32, AB 32 mandates that CARB establish a quantified emissions cap and institute a schedule to meet the cap; implement regulations to reduce Statewide GHG emissions from stationary sources consistent with the California Climate Action Team strategies; and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. To reach the reduction targets, AB 32 requires CARB to adopt—in an open, public process—rules and regulations that achieve the maximum technologically feasible and cost-effective GHG reductions.

Senate Bills

Senate Bill 743

SB 743 was signed by Governor Brown in 2013, which creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Office of Planning and Research to amend the CEQA Guidelines to provide an alternative to level of service methodology for evaluating transportation impacts.[53] Particularly within areas served by terabit, the required alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates or automobile trips generated."

Senate Bill 375

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations.[54] The act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy that prescribes land use allocation in that MPO's regional transportation plan

53 California Public Resources Code Section 21099(b)(1)–(2) (2025). Accessed October 2025.

54 California Legislative Information. *Senate Bill No. 375* (September 30, 2008). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375. Accessed August 2024.

(RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035.

Senate Bill X1-2: 2020 Renewable Portfolio Standard

On April 12, 2011, California governor Jerry Brown signed SB X1-2.[55] This bill supersedes the 33% by RPS created by Executive Order S-14-08, previously signed by Governor Schwarzenegger. The RPS required that all retail suppliers of electricity in California serve 33% of their load with renewable energy by 2020. A number of significant changes are made in SB X1-2. It extends application of the RPS to all electric retailers in the State, including municipal and public utilities, and community choice aggregators.

SB X1-2 creates a three-stage compliance period for electricity providers to meet renewable energy goals: 20% of retail sales must be renewable energy products by 2013, 25% of retail sales must be renewable energy products by 2016, and 33% of retail sales must be renewable energy products by 2020. The 33% level must be maintained in the years that follow. This three-stage compliance period requires the RPS to be met increasingly with renewable energy that is supplied to the California grid and is located within or directly proximate to California. SB X1-2 mandates that renewables from this category make up:

- At least 50% for the 2011–2013 compliance period;
- At least 65% for the 2014–2016 compliance period; and
- At least 75% for 2016 and beyond.

SB X1-2 sets rules for the use of Renewable Energy Credits (RECs) as follows:

- Establishes a cap of no more than 25% unbundled RECs going toward the RPS between 2011 and 2013, 15% from 2014 to 2016, and 10% thereafter;
- Does not allow for the grandfathering of tradable REC contracts executed before 2010, unless the contract was (or is) approved by the California Public Utilities Commission (CPUC);
- Allows banking of RECs for 3 years only; and
- Allows energy service providers, community choice aggregators, and investor-owned utilities with 60,000 or fewer customers to use 100% RECs to meet the RPS.

SB X1-2 also eliminates the Market Price Referent, which was a benchmark to assess the above-market costs of RPS contracts based on the long-term ownership, operating, and fixed-price fuel costs for a new 500-megawatt (mW) natural-gas-fired, combined-cycle gas turbine.

55 CEC. Renewable Portfolio. http://www.energy.ca.gov/portfolio. Accessed August 2024.

Senate Bill 350: Clean Energy and Pollution Reduction Act

SB 350, the Clean Energy and Pollution Reduction Act of 2015, was signed on October 7 of that year. SB 350 implements some of the goals of Executive Order B-30-15 described above. The objectives of SB 350 are: (1) to increase the procurement of our electricity from renewable sources from 33% to 50%; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[56]

Senate Bill 97

In August 2007, the California State Legislature adopted SB 97 requiring the Governor's OPR to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009.[57] In response to SB 97, the Office of Planning and Research (OPR) adopted CEQA guidelines that became effective on March 18, 2010. However, neither a threshold of significance nor any specific mitigation measures are included or provided in the guidelines. The guidelines require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project.

Discretion is given to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[58]

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[59]

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56 California Legislative Information. *Senate Bill No. 350* (October 7, 2015). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350. Accessed August 2024.

57 California Public Resources Code Section 21083.05.

58 14 Cal. Code Regs. Section 15064.4(b).

59 Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

Senate Bill 32 and Assembly Bill 197

Enacted in 2016, SB 32 codifies the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that Statewide GHG emissions are reduced to 40% below 1990 levels by 2030.[60] The reduction of GHG emissions is a priority for development projects throughout the State and is achieved through a combination of policies, planning, direct regulations, market approaches, incentives, and voluntary efforts. Generally speaking, the focus of GHG emission reductions is on energy production and motor vehicles.

SB 32 was coupled with a companion bill: AB 197.[61] Designed to improve the transparency of CARB's regulatory and policy-oriented processes, AB 197 created the Joint Legislative Committee on Climate Change Policies, a committee with the responsibility to ascertain facts and make recommendations to the Legislature concerning Statewide programs, policies and investments related to climate change. AB 197 also requires CARB to make certain GHG emissions inventory data publicly available on its website; consider the social costs of GHG emissions when adopting rules and regulations designed to achieve GHG emission reductions; and include specified information in all Scoping Plan updates for the emission reduction measures contained therein.

Center for Biological Diversity v. California Department of Fish and Wildlife

The California Supreme Court's decision published on November 30, 2015, in *Center for Biological Diversity v. California Department of Fish and Wildlife*[62] reviewed the methodology used to analyze GHG emissions in an EIR prepared for a project that proposed 20,885 dwelling units with 58,000 residents on 12,000 acres of undeveloped land in a rural area of the City of Santa Clara.[63] That EIR used the "business as usual" (BAU) methodology to determine whether the project would impede the State of California's compliance with statutory emissions reduction mandate established by the AB 32 Scoping Plan. The Court did not invalidate the BAU approach entirely, but did hold that:

> *The Scoping Plan nowhere related that statewide level of reduction effort to the percentage of reduction that would or should be required from individual projects and nothing Department of Fish and Wildlife or Newhall have cited in the administrative*

60 California Health & Safety Code Section 38566 (West 2025). https://california.public.law/codes/health_and_safety_code_section_38566. Accessed October 2025.

61 California Government Code Section 9147.10(a) (West 2025), https://california.public.law/codes/government_code_section_9147.10. Accessed October 2025.

62 *Center for Biological Diversity et al. v. California Department of Fish and Wildlife* (2015) (62 Cal.4th 204. 195 Cal.Rptr.3d 247. 361 P.3d 342). http://climatecasechart.com/case/center-for-biological-diversity-v-california-department-of-fish-and-wildlife/. Accessed August 2024.

63 California Department of Fish and Wildlife. *Newhall Ranch Resource Management and Development Plan and Spine flower Conservation Plan*. https://www.wildlife.ca.gov/regions/5/newhall. Accessed August 2024.

> *record indicates the required percentage reduction from business as usual is the same for an individual project as for the entire state population and economy.*[64]

The California Supreme Court suggested regulatory consistency as a pathway to compliance, stating that a Lead Agency might assess consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities. The Court recognized that to the extent a project's design features comply with or exceed the regulations outlined in the Scoping Plan, and adopted by CARB or other State agencies, a Lead Agency could appropriately rely on their use as showing compliance with performance-based standards adopted to fulfill a Statewide plan for the reduction or mitigation of greenhouse gas emissions. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of greenhouse gas emissions. Importantly, the Supreme Court also suggested "a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions (brightline threshold approach)."[65]

California Energy Commission (CEC)

Building Energy Efficiency Standards

Title 24, Part 6 of the CCR, regulates the design of building shells and building components. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The CEC adopted the 2016 Building Energy Efficiency Standards (2016 Building Standards), effective January 1, 2017. Additionally, the CEC adopted the 2019 Building Energy Efficiency Standards (2019 Building Standards) and became effective January 1, 2020. Two key areas specific to nonresidential development in the 2019 Building Standards focus on nonresidential ventilation requirements and nonresidential lighting requirements.[66] Under the 2019 Building Standards, nonresidential buildings will be 30% more energy efficient compared to the 2016 Building Standards.

The CPUC, CEC, and CARB also have a shared, established goal of achieving Zero Net Energy (ZNE) for new construction in California. The key policy timelines include (1) all new residential

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64 *Center for Biological Diversity et al. v. California Department of Fish and Wildlife* (2015) (62 Cal.4th 204, 195 Cal.Rptr.3d 247, 361 P.3d 342).

65 SCAQMD. *Interim CEQA Greenhouse Gas (GHG) Significance Thresholds, draft guidance document (October 2008)*. Attachment E. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf. Accessed August 2024.

66 CEC. 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings. https://www.energy.ca.gov/title24/2019standards/. Accessed August 2024.

construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030.

The ZNE goal generally means that new buildings must use a combination of improved efficiency and renewable energy generation to meet 100% of their annual energy need, as specifically defined by the CEC:

> *A ZNE Code Building is one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building, at the level of a single "project" seeking development entitlements and building code permits, measured using the [CEC]'s Time Dependent Valuation (TDV) metric. A ZNE Code Building meets an Energy Use Intensity value designated in the Building Energy Efficiency Standards by building type and climate zone that reflect best practices for highly efficient buildings.*

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), (commonly referred to as "CAL Green"), establish voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. CAL Green is periodically amended; the most recent 2022 standards became effective on January 1, 2023.[67]

Appliance Standards

The CEC periodically amends and enforces Appliance Efficiency Regulations contained in Title 20 of the CCR. The regulations establish water and energy efficiency standards for both federally regulated appliances and non–federally regulated appliances. The most current Appliance Efficiency Regulations, dated July 2015, cover 23 categories of appliances (e.g., refrigerators; plumbing fixtures; dishwashers; clothes washer and dryers; televisions) and apply to appliances offered for sale in California.

Regional

Southern California Association of Governments (SCAG)

The City is a member agency of the SCAG. SCAG is the MPO for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and

67 California Building Standards Commission. *2022 California Building Standards Code.* Effective Dates (last visited Oct. 6, 2025). https://content.govdelivery.com/accounts/CADGS/bulletins/3256ac2.

air quality. Pursuant to California Health and Safety Code Section 40460(b),[68] SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.[69]

With regard to GHG emissions, SCAG prepared and adopted the 2024–2050 RTP/SCS (Connect SoCal), which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving a 19% reduction in passenger vehicle GHG emissions on a per capita basis by 2035 on a per capita basis compared to 2005 level on a per capita basis, and 21% reduction by 2040 on a per capita basis compared to the 2005 level on a per capita basis.[70]

Local

City of Oxnard Climate Action and Adaptation Plan (CAAP)

The City's CAAP[71] is a qualified GHG reduction Plan under CEQA Guidelines Section 15183.5 and identifies seven areas where the City can reduce GHG emissions: clean energy, water conservation and reuse, green buildings, waste reduction and recycling, transportation, nature-based solutions, and land use. The CAAP establishes a target to reduce GHG emissions 50% below 2010 levels by 2030, consistent with state law. The CAAP presents an inventory of GHG emissions originating from the City and sets forth strategies and actions to reduce emissions and help the community adapt to a changing climate. Projects consistent with the CAAP, including conformance with any performance measures applicable to the project, would not require additional GHG emissions analysis and mitigation under CEQA Guidelines Sections 15064(h) and 15183.5(b)(2).

City of Oxnard General Plan

The City's General Plan contains goals and policies to guide decision making in the City for day-today and long-term strategic planning and operations in the City. The following City of Oxnard General Plan policies and goals are applicable to greenhouse gases.

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68 California Health and Safety Code. Division 26. Air Resources, PART 3. Air Pollution Control Districts. Chapter 5.5. South Coast Air Quality Management District. ARTICLE 5. Plan, Section 40460(b). https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=40460.&lawCode=HSC. Accessed August 2024.

69 40 C.F.R. Section 93.104(d) (2025).

70 Southern California Association of Governments (SCAG). *Connect SoCal: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategies*. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-ch-05-measuring-our-progress-040424.pdf?1712261492. Accessed August 2024.

71 City of Oxnard. *Climate Action and Adaptation Plan*. Accessed August 2025. https://www.oxnard.org/wp-content/uploads/2023/01/Oxnard-CAAP_2022-12-07_Adopted.pdf.

Goal SC-1: Supporting and Participating in Global Warming and Climate Change Adaptation analysis and programs.

Policy SC-1.1: ***Inventory and Monitor GHG Emissions.***

Inventory and monitor GHG emissions in City operations and in the community consistent with Ventura County Air Pollution Control District and/or State guidelines.

Policy SC-1.2: ***Support Statewide Global Warming and Climate Change Mitigation.***

Continue to monitor and support the efforts of the California Air Resources Board and other agencies as they formulate Global Warming and Climate Change adaption and mitigation strategies and programs.

Policy SC-1.3: ***Develop a Climate Action and Adaptation Plan (CAAP) That Supports the Regional SB 375 Sustainable Communities Strategy.***

Develop a Climate Action and Adaption Plan that implements requirements adopted by the California Air Resources Board and/or the Ventura County APCD that establishes a GHG emissions qualitative and quantitative threshold of significance, establishes GHG reduction targets, and supports the regional SB 375 Sustainable Communities Strategy.

Goal SC-2: Sea level rise is routinely considered relative to coastal areas and other City decisions, as relevant.

Policy SC-2.1: ***Sea-Level Rise and Updating the Local Coastal Program.***

Include best-available information regarding possible sea-level rise in the next revision of the Local Coastal Program, which should be initiated within one year of adoption of the 2030 General Plan.

Policy SC-2.2: ***Sea Level Monitoring System.***

Consider installation of a sea-level monitoring system that detects small changes to coastal sea level and tidal change.

Policy SC-2.3: ***Sea Level Rise Consideration in Decision-Making.***

Ensure that all planning, public works, and related decisions

take rising sea level into consideration and take steps to reduce risk of damage or loss of life and property.

Policy SC-2.4: ***Avoidance of Coastal Armoring or Hardening.***

Wherever feasible, avoid coastal armoring or hardening in new development or in mitigating current and future risk to existing development.

Goal SC-3: Energy efficiency performance standards and generation from renewable sources.

Policy SC-3.6: ***Targets for Zero-Emission Vehicles.***

As part of the City EAP, meet or exceed state targets for zero-emission fuel vehicle miles traveled within the City by supporting the use of zero-emission vehicles (low speed "neighborhood electric vehicles", utility low-range battery electric vehicles, mid-range "city electric vehicles", full function battery electric vehicles, and fuel cell vehicles) within City departments and divisions.

Policy SC-3.7: ***Renewable Energy Production Requirement.***

As part of the City and Community EAP's, require that master planned commercial and industrial developments incorporate solar, wind, and other renewable energy generation and transmission equipment unless demonstrated to the satisfaction of a qualified renewable energy consultant to be infeasible.

Policy SC-3.9: ***Promote Voluntary Incentive Programs.***

Promote voluntary participation in incentive programs to increase the use of solar photovoltaic systems in new and existing residential, commercial, institutional and public buildings, including continued participation in the Ventura County Regional Energy Alliance (VCREA).

Policy SC-3.10: ***Alternatives to Power Plant Generation.***

Evaluate the feasibility of incorporating alternative sources of power generation such as wind and tidal power into the regional existing power supply grid to reduce reliance on GHG emission producing public utility and privately-owned power plants.

Goal SC-4: Implementation of the California Green Building Code.

Policy SC-4.1: ***Green Building Code Implementation.***

Implement the 2010 California Green Building Code as may be amended (CALGREEN) and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.

Goal CD-1: A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.

Policy CD-1.2: ***Infill Development, Priority to Mixed Use.***

Promote the efficient use of larger vacant parcels and vacant areas of the City by encouraging infill development, with a priority to mixed uses that reduce vehicle trips and GHG emissions and promote sustainable development goals and objectives.

Policy CD-1.4: ***Transportation Choices.***

Promote the application of land use and community designs that provide residents with the opportunity for a variety of transportation choices (pedestrian, bicycle, transit, automobile).

Policy CD-1.9: ***Commute Reduction.***

Minimize the commuting distances between residential concentrations and employment centers by encouraging the development of mixed land uses in appropriate areas.

Goal CD-5: Development of industrial uses in appropriate areas, assistance in the location of new industry, retention and expansion of existing industry, and maintenance of the City's economic vitality.

Policy CD-5.2: ***Compatible Land Use.***

Ensure adequate separation between sensitive land uses (residential, educational, open space, healthcare) to minimize land use incompatibility associated with noise, odors, and air pollutant emissions.

Policy CD-5.4: ***Environmentally Friendly and "Green" Industry.***

Seek to attract industrial development that avoids or minimizes substantial pollution, noise, glare, odor, use of

hazardous materials, or other offensive activity and/or is a component of the emerging Green industry.

Goal CD-7: Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.

Policy CD-7.1: ***Establishment of Urban Villages.***

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

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

Policy CD-7.4: ***Urban Village Design Guidelines.***

Develop Urban Village Design Guidelines that incorporate the following features, where appropriate:

- *Provide a variety of transportation choices and an interconnected multi-modal mobility network.*
- *Offer a variety housing choices and opportunities, including at least 15 percent affordable housing.*
- *Encourage compact development in order to free up more private and civic open space.*
- *Preserve open space, historic, cultural, and natural assets.*
- *Use green and sustainable building and planning technologies.*
- *Incorporate methods of measuring vehicle trips as part of the metrics required for a Sustainable Community Strategy (SB 375).*

Policy CD-7.6: ***Connectivity.***

Provide connectivity to other activity nodes in the form of roadways, transit connections, and bicycle and pedestrian linkages that encourages non-vehicular travel modes. Urban villages should be considered major transit transfer points and have amenities oriented towards transit users.

Goal CD-8: Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.

Policy CD-8.1: ***Limiting Development.***

Continue to limit development to those areas that can be served by existing or planned utilities, transportation, and service systems.

Policy CD-8.5: ***Impact Mitigation.***

Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.

Policy CD-8.7: ***Community Balance.***

Create an appropriate balance between urban development and preservation of agricultural uses by promoting development within the CURB while designating land outside the CURB as Resource Protection, Open Space or Agricultural land use, unless otherwise allowed through a CURB amendment and/or exemptions from the SOAR ordinance.

Policy CD-8.9: ***Jobs/Housing Balance & Sustainable Communities Strategy (SB 375).***

Incorporate inter- and intra-city jobs/housing balance in the development of the regional and subregional Sustainable Communities Strategy (SB 375), Urban Village strategy and strategic plans, with the main intent to reduce single-occupancy work-related vehicular trips.

Goal CD-10: Neighborhoods and urban villages with a distinct sense of place.

Policy CD-10.1: ***Human-Scale Development.***

In the evaluation of development proposals, require urban development on a human scale, by emphasizing the pedestrian experience over the movement and storage of

vehicles.

Policy CD-10.2: ***Neighborhood Themes.***

In the evaluation of development proposals, require neighborhood themes and principles of design, such as neotraditional town planning, which include central parks, schools, and community and commercial facilities, strong pedestrian orientation and de-emphasis of automobile related elements in new development projects.

Goal CD-21: An updated Local Coastal Program that includes the restoration of the Ormond Beach wetlands and consideration of climate change issues.

Policy CD-21.2: ***Modify non-Coastal Dependent Energy Uses.***

When the LCP is being updated, clarify that non Coastal-dependent energy facilities are not allowed in the Energy Coastal zone with exceptions for renewable energy installations such as solar panels and wind turbines under certain conditions and consistent with the Coastal Act.

Goal ICS-3: Level of service "C" at designated intersections, unless otherwise reduced by City Council direction.

Policy ICS-3.4: ***Roadway Design/101 Freeway Capacity.***

Review the potential addition of auxiliary lanes or lane expansion to increase roadway width and number of lanes, where feasible, in order to mitigate traffic congestion and improve level of service.

Goal ICS-6: Public transit system that serves the needs of the residents and workers of Oxnard.

Policy ICS-6.1: ***Transit Facilities for New Developments.***

Include transit facilities such as bus benches, shelters, pads or turnouts, where appropriate, in new development improvement plans.

Policy ICS-6.2: ***Transit Service Provision.***

Continue to participate with public transit agencies to develop bus service to major commercial, employment, school and special event destinations.

Policy ICS-6.3: ***Paratransit.***

Continue to support dial-a-ride and other paratransit options for senior and disabled residents of the City.

Policy ICS-6.4: ***Private Bus Transportation.***

Support private bus transportation (including Greyhound, Transportes Intercalifornias and the Ventura County Airporter, etc.) for increased commuter and travel options for residents of the City and the region.

Goal ICS-7: Effective Transportation Demand Management (TDM) programs that help achieve air quality goals and minimize congestion.

Policy ICS-7.1: ***Require Transportation Demand Management Programs (TDM).***

Consider requiring TDM programs with preferred parking, car pool and van pool vehicles, and ride sharing where feasible and appropriate.

Policy ICS-7.2: ***Reduce Single-Occupancy Automobile Dependency.***

Reduce singe-occupancy automobile use and increase the use of alternative forms of transportation as a means of reducing energy consumption and vehicle emissions.

Policy ICS-7.3: ***Travel Patterns.***

Promote compact, mixed use development patterns that compliment and encourage TDM programs, pedestrian and bicycle travel, and transit use.

Goal ICS-8: Safe bicycle and pedestrian circulation throughout the City.

Policy ICS-8.4: ***New Development Requires Bicycle Improvements.***

Where designated, require proposed developments to include bicycle paths and / or lanes in their plan and to clearly indicate possible bicycling hazards such as speed bumps and storm drain inlet grates in parking lots.

Policy ICS-8.5: ***Public Sidewalks and Pedestrian Orientation.***

Consider and require where appropriate and feasible the enhancement of the pedestrian environment as part of private development and public works projects, especially for public

sidewalks.

Policy ICS-8.6: ***Americans with Disability Act (ADA) Handicap Requirements.***

Require installation of ADA compliant handicapped ramp curb-cuts and other ADA access with all new roadway construction and significant reconstruction of existing roadways, parking lots, plazas and pedestrian area, and parks.

Policy ICS-8.8: ***Educational Facilities.***

Coordinate with public school districts and other educational facilities to design pedestrian and bicycle access as the preferred access to schools rather than vehicular, and improve drop off and pick up circulation, especially during the morning and afternoon peak periods.

Policy ICS-8.9: ***Street Crossings.***

Design street crossings to provide for the safety needs of bicyclists and pedestrians in accordance with the designations set forth in the Bicycle Master Plan.

Policy ICS-8.12: ***Roadway Surfacing.***

Maintain and improve the surface quality of the right shoulder of roadways so that it is suitable for bicycle travel.

Goal ICS-11: Water supply, quality, distribution, and storage adequate for existing and future development.

Policy ICS-11.6: ***Water Conservation and/or Recycling Connection as Mitigation.***

Require the use of water conservation offset measures (efficient low flow fixtures and irrigation systems, drought tolerant landscaping, leak detection programs, water audits, and public awareness and education programs) and/or proportional contributions to recycled water production and/or conveyance infrastructure related to the GREAT Program as mitigation for water supply shortage as determined by a Water Supply Assessment, CEQA documentation, or similar analysis as part of new or master plan development review.

Policy ICS-11.7: ***Water Wise Landscapes.***

Promote water conservation in landscaping for public facilities and streetscapes, residential, commercial and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new and replacement landscaping.

Policy ICS-11.12: ***Water for Irrigation.***

Require the use of non-potable water supplies for irrigation of landscape and agriculture, whenever available.

Goal ICS-17: Adequate and efficient public utilities that meet the needs of residents of the City.

Policy ICS-17.3: ***Promoting Renewable Energy Production.***

Encourage the use of renewable solar, wine, and other electric generation technologies instead of new or expansion of fossil fuel-based generation facilities.

Goal ICS-21: High quality, well maintained school facilities for the residents of Oxnard.

Goal ER-14: Improved air quality and minimized adverse effects of air pollution on human health and the economy.

Policy ER-14.1: ***Incorporate VCAPCD AQMP Mitigations.***

Incorporate construction and operation mitigation measures recommended or required by the current Ventura County Air Quality Management Plan (AQMP) when preparing CEQA reviews, as appropriate.

Policy ER-14.2: ***Transportation Demand Management (TDM).***

Employ best traffic management practices such as bus turnouts and traffic signal synchronization in order to reduce traffic-related air emissions impacts; require commercial developers to improve public transit service between residential and employment uses or shopping centers, bike lanes and protected bicycle parking areas, and other project features that would reduce the need for automobile trips related to the development; and require Transportation Management Associations (TMA) for projects that may have adverse air quality impacts related to mobile sources and contributions to off-site TDM funds to reduce residual impacts that cannot be mitigated on a project-specific basis.

Policy ER-14.3: ***Reducing Carbon Monoxide Exposure at Congested Intersections.***

Require mitigation measures that consider prohibiting the construction of residences or buildings lacking ventilation systems at congested intersections with the potential for excessive Carbon Monoxide "hot spot" exposure to sensitive receptors.

Policy ER-14.4: ***Emission Control Devices.***

Require all construction equipment to be maintained and tuned to meet appropriate EPA, CARB, and VCAPCD emissions requirements and when new emission control devices or operational modifications are found to be effective, such devices or operational modifications are required on construction equipment.

Policy ER-14.5: ***Reducing Construction Impacts during Smog Season.***

Require that the construction period be lengthened to minimize the number of vehicles and equipment operating at the same time during smog season (May though October).

Policy ER-14.6: ***Minimizing Dust and Air Emissions through Permitting Requirements.***

Continue to require mitigation measures as a condition of obtaining building or use permits to minimize dust and air emissions impacts from construction.

Policy ER-14.7: ***Mitigation Monitoring.***

Ensure that projects with identified air quality impacts in their respective EIRs are subject to effective mitigation monitoring as required by AB 3180.

Policy ER-14.8: ***Regional Cooperation and SB 375.***

Cooperate with other local, county, regional, and State agencies in implementing air quality plans to achieve State and Federal Ambient Air Quality Standards and in preparing, adopting, and implementing the SCAG Sustainable Communities Strategy (SB 375).

Policy ER-14.9: ***Participate in Regional Partnerships.***

Participate with cities, surrounding counties, and regional agencies such as VCOG and VCTC and SCAG to address cross-jurisdictional and regional transportation and air quality issues.

Policy ER-14.10: ***Consultation with Ventura County Air Pollution Control District.***

Consult with the Ventura County Air Pollution Control District (VCAPCD) during CEQA review for projects that require air quality impact analysis and ensure that the VCAPCD is on the distribution list for all CEQA documents.

Policy ER-14.11: ***Support Regional Attainment Plans.***

Support recommendations to reduce air pollutants found in the VCAPCD local attainment plans and use its regulatory authority to mitigate "point" sources of air pollution (e.g., factories, powerplants, etc.).

Policy ER-14.12: ***Use VCAPCD Air Quality Assessment Guidelines.***

Use the VCAPCD Air Quality Assessment Guidelines and recommended analytical tools for determining and mitigating project air quality impacts and related thresholds of significance for use in environmental documents. The City shall continue to cooperate with the VCAPCD in the review of development proposals.

Policy ER-14.13: ***Co-locate Ancillary Services.***

Strongly encourage the location of ancillary employee services (including, but not limited to, child care, restaurants, banking facilities, convenience markets) at major employment centers for the purpose of reducing midday vehicle trips.

Goal SH-8.1: Acceptable safety and environmental health risks associated with vehicular transit.

Policy ER-8.1: ***Planning Programs.***

Continue to support land use, transportation management, infrastructure, and environmental planning programs that reduce vehicle emissions, improve air quality, and minimize risks.

4.8.3 Significance Thresholds

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

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

4.8.4 Methodology

The analysis of the Project's GHG emissions consists of a quantitative analysis of the GHG emissions generated by the Project and a qualitative analysis of the Project's consistency with adopted GHG-related legislation, plans, and policies. This approach is in accordance with CEQA Guidelines Section 15064.4(a), which affirms the discretion of a lead agency to determine, in the context of a particular project, whether to use quantitative and/or qualitative methodologies to determine the significance of a project's impacts.

The determination of a project's significance on GHG emission shall be made considering the factors provided in the City of Oxnard CEQA Guidelines.[72] According to the City of Oxnard CEQA Guidelines, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of a project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. The City of Oxnard has not adopted a numerical significance threshold for assessing impacts related to GHG emissions but has an adopted CAAP for reduction of GHG emissions. Neither the VCAPCD, California Office of Planning and Research, CARB, California Air Pollution Control Officers Association, nor any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the proposed project.

In the absence of any adopted numeric threshold, the significance of the proposed project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the proposed project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Therefore, the significance of the proposed project's potential impacts regarding GHG emissions and climate change is evaluated based on consistency with plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change.

The most directly applicable adopted regulatory plans to reduce GHG emissions are the State of California's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan), SCAG's 2024-2050 RTP/SCS, the City of Oxnard General Plan, and the City of Oxnard CAAP. These regulatory plans are described in the Consistency with Applicable Plans and Policies section below. GHG emissions from the construction and operation of the proposed project are provided for informational purposes.

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72 City of Oxnard. *CEQA Significance Threshold Guidelines.* December 2024. accessed September 2025. https://www.oxnard.gov/wp-content/uploads/Final-CEQA-Threshold-Guidelines-2024-and-Resolutions.pdf

Recent federal actions affecting certain California mobile source emissions regulations have introduced regulatory uncertainty regarding the implementation of specific vehicle electrification programs. However, because the Project's GHG significance determination is based on consistency with adopted statewide, regional, and local climate planning documents rather than reliance on any single regulatory program, these federal actions do not affect the methodology used to evaluate the Project's GHG emissions under CEQA.

Emissions Inventory Modeling

The total GHG emissions from the Project were quantified to determine the level of the Project's estimated annual GHG emissions. As with the Air Quality section of this EIR (see **Section 4.3: Air Quality** of this Draft EIR), construction emissions were estimated using CalEEMod version 2022.1.1.30 by assuming a conservative estimate of construction activities and applying the mobile-source emissions factors. The modeling used the same input values as previously discussed under the methodology section for air quality.

CalEEMod was also used to estimate operational GHG emissions from electricity, solid waste, water and wastewater, and landscaping equipment. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. Mobile-source emissions were estimated based on the CARB EMFAC model. For mobile sources, CalEEMod was used to generate the trip rates and vehicle miles traveled from the existing and proposed uses.

With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Energy demand rates were estimated based on square footage as well as predicted water supply needs for this use. Energy demand (off-site electricity generation) for the Project was calculated within CalEEMod using the CEC's CEUS data set, which provides energy demand by building type and climate zone.

Emissions of GHGs from solid waste disposal were also calculated using CalEEMod software. The emissions are based on the waste disposal rate for the land uses, the waste diversion rate, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for methane, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery), which are Statewide averages, were used in this assessment.

Emissions of GHGs from water and wastewater result from the required energy to supply and distribute the water and treat the wastewater. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions are calculated using CalEEMod and are based on the water usage rate for the proposed uses; the electrical intensity factors for water supply, treatment,

and distribution and for wastewater treatment; the GHG emission factors for the electricity utility provider; and the emission factors for the wastewater treatment process.

CalEEMod also quantifies common refrigerant GHGs used in air conditioning and refrigeration equipment, some of which are HFCs.

With respect to emission rates, CalEEMod incorporates EMFAC2021 emission rates by vehicle class and vehicle process. Specific CO_2 emissions, EMFAC and subsequently CalEEMod take into account the following emission processes related to CO_2 on an annual basis:

- Start Exhaust: Extra emissions that occur when starting a vehicle.
- Idle Exhaust: Emissions occur during extended idling events or when the vehicle is not operating any significant distance.
- Run Exhaust: Emissions occur when traveling on the road, including at speed and idling, as part of normal driving.

2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the CEQA." (Page 4 of Appendix D.)

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50% of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: (transportation electrification, VMT reduction, and building decarbonization). "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." (Page 9 of Appendix D.)

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing[73] while demonstrating that a Project is in alignment with the State's Climate Goals. The State

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73 The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20. Appendix D. 2022 Scoping Plan Update. November 2022

calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

4.8.5 Project Impacts

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

Construction

Construction GHG emissions for Del Sol High School were previously analyzed in the OUHSD's New High School No. 8 EIR (the "New High School EIR").[74] The construction emissions identified in the New High School EIR are shown in **Table 4.8-7: Del Sol High School Construction GHG Emissions.** As shown in **Table 4.8-7**, total construction emissions from Del Sol High School were estimated to be 2,947 metric tons of CO_2e ($MTCO_2e$). One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame because this is a typical interval before a new building requires its first major renovation.[75] When amortized over an average 30-year Project lifetime, average annual construction emissions from the Project would be 98 MTCO2e per year.

TABLE 4.8-7: DEL SOL HIGH SCHOOL CONSTRUCTION GHG EMISSIONS

	$MTCO_2e$/Year
Total Construction Emissions	**2,947**
30-Year Annual Amortized Rate	**98**

Notes: GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*. https://files.ceqanet.opr.ca.gov/64030-2/attachment/Hgni8w7hLuA--vUekhSzn9XYr0Sm3HeBZzNz0glEgLi2hyCNwU3RKEqpKLaz0TSjMy-QTA2bLkKSYlvb0. Accessed March 2025.

The proposed Project would include construction of residential, commercial, and other supporting uses allowed by the proposed Sub-Neighborhood Plan in both Area A and Area C. Both areas are conservatively assumed to develop concurrently for purposes of analysis. Construction of Area A would include four phases: Grading, Building Construction, Paving, and application of Architectural

74 Oxnard Union High School District. *Draft Environmental Impact Report New High School No. 8*. https://files.ceqanet.opr.ca.gov/64030-2/attachment/Hgni8w7hLuA--vUekhSzn9XYr0Sm3HeBZzNz0glEgLi2hyCNwU3RKEqpKLaz0TSjMy-QTA2bLkKSYlvb0. Accessed March 2025.

75 International Energy Agency (IEA). *Energy Efficiency Requirements in Building Codes. Energy Efficiency Policies for New Buildings, IEA Information Paper (2008)*.

Coatings (e.g., paint), and Area C would include five phases: Demolition, Grading, Building Construction, Paving, and Architectural Coating. Construction activity impacts are relatively short in duration, so they contribute a relatively small portion of the total lifetime GHG emissions of a project. The combustion of fossil fuels in construction equipment results in GHG emissions of CO_2 and smaller amounts of CH_4 and N_2O. Emissions of GHG would also result from the combustion of fossil fuels from vendor trucks delivering materials and construction worker vehicles commuting to and from the Project Site. Typically, light-duty and medium-duty automobiles and trucks would be used for worker trips and heavy-duty trucks would be used for vendor trips. The vast majority of motor vehicles used for worker trips rely on gasoline as an energy source while motor vehicles used for vendor trips primarily rely on diesel as an energy source. In addition, GHG emissions-reduction measures for construction equipment are relatively limited. Therefore, construction emissions are amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.

Estimating construction-related GHG emissions requires developing assumptions regarding the timing of construction as the emission factors for some of the Project's construction-related GHG emission sources decline over time. The construction schedule used in CalEEMod represents a reasonable and conservative estimate of project phasing. While the specific timing of construction activities may shift during project implementation, provided that the overall construction duration, equipment mix, and daily activity levels remain consistent with those assumed in the modeling, such changes would not result in an increase in total GHG emissions. Construction-related GHG emissions are primarily a function of fuel consumption over the duration of construction activities and are not substantially influenced by the specific calendar months in which those activities occur. As such, a shift in construction timing without a change in total duration or intensity of activity would result in comparable total GHG emissions. Therefore, the modeled emissions represent a reasonable estimate of the Project's construction-related GHG impacts.

As shown in **Table 4.8-8: Area A and Area C Construction GHG Emissions,** total construction emissions for Areas A and C would be 7,604 $MTCO_2e$. When amortized over an average 30-year Project lifetime, average annual construction emissions from the Project would be 254 MTCO2e per year.

TABLE 4.8-8: AREA A AND AREA C CONSTRUCTION GHG EMISSIONS

Construction Phase	$MTCO_2e$/Year
Area A	
2027	1,517
2028	1,267
2029	1,244
2030	1,224
2031	1,140

TABLE 4.8-8: AREA A AND AREA C CONSTRUCTION GHG EMISSIONS	
Construction Phase	**$MTCO_2e$/Year**
2032	135
Area C	
2027	788
2028	289
Total Construction Emissions	**7,604**
30-Year Annual Amortized Rate	**254**

Notes: GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: Meridian. Air Quality, Greenhouse Gas, and Energy Study. **Appendix E.**

Operation

Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after buildout. The Project would comply with Federal, State, and Regional regulations. Emissions were estimated using CalEEMod based on the land uses in the proposed Project. Estimated emissions reflect the maximum buildout included in the Maulhardt-Stiles Sub-Neighborhood Plan including the development of up to 950 residential dwelling units, a maximum of 40,000 square feet of retail and general commercial space, public parks and associated circulation and landscaping. This section addresses operational GHG emissions.

Area Sources

The area source GHG emissions included in this analysis result from landscaping-related fuel combustion sources, such as lawn mowers as well as hearths, such as fireplaces. CalEEMod defaults were used for landscape maintenance emissions. Area source emissions are shown in **Table 4.8-9: Area Source GHG Emissions**. As shown in **Table 4.8-9**, Project emissions would result 12 $MTCO_2e$ per year from area sources.

TABLE 4.8-9: AREA SOURCE GHG EMISSIONS	
Source	**Unmitigated $MTCO_2e$ per year**
Hearths	0
Landscaping	12
Total	**12**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

Energy Sources

GHGs are emitted as a result of activities in buildings when electricity is used as an energy source.[76] Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emission in an indirect manner.

GHG emissions from electricity use are directly dependent on the electricity utility provider. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. Additionally, GHG emissions from natural gas are dependent on the gas utility provider. Natural gas use in buildings results from natural gas appliances, such as stoves.

Energy source emissions are shown in **Table 4.8-10: Energy Source GHG Emissions**. As shown in **Table 4.8-10**, the Project would generate 1,929 $MTCO_2e$ per year from electricity consumption.

TABLE 4.8-10: ENERGY SOURCE GHG EMISSIONS

Source	Unmitigated $MTCO_2e$ per year
Electricity	
Apartment Low Rise	902
Retail	95
Parks	0
Natural Gas	
Apartment Low Rise	919
Retail	13
Parks	0
Total	**1,929**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

Mobile Source Emissions

Vehicle trips generated by the Project would generate operational emissions through the combustion of fossil fuels. CO_2 emissions were determined based on the trip rates resulting from the land uses included in proposed Project with default trips rates from CalEEMod. The Project is served by the

76 USEPA. Commercial and Residential Sector Emissions (last updated Mar. 31, 2025). https://www.epa.gov/ghgemissions/commercial-and-residential-sector-emissions.

nearby existing transit services, including Gold Coast Transit, which has stops for multiple bus routes within 0.5 miles of the Project Site including #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). Additionally, the Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations within the Project Site vicinity including at the northeast corner of Rose Avenue and Camino Del Sol, at the southwest corner of Rose Avenue and Camino de la Luna, the northeast corner of Rose Avenue and Jacinto Drive, the north east corner of Rose Avenue and Cesar Chavez Drive, and the southwest corner of Rose avenue and Cesar Chavez Drive. The Project Site is also served by Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol. As shown in **Table 4.8-11: Mobile Source GHG Emissions**, the Project's mobile source emissions would result in 1,057 $MTCO_2e$ per year.

TABLE 4.8-11: MOBILE SOURCE GHG EMISSIONS

Source	Unmitigated $MTCO_2e$ per year
Mobile (trips)	1,057
Total	**1,057**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

Solid Waste Emissions

Solid waste generation and associated emissions are calculated using default data found in CalEEMod for the proposed land uses. Disposal of organic waste in landfills can lead to the generation of CH_4, a potent GHG. By generating solid waste, the Project would contribute to the emission of fugitive CH_4 from landfills, as well as CO_2 and N_2O from the operation of trash collection vehicles. As shown in **Table 4.8-12: Solid Waste Source GHG Emissions**, GHG emissions resulting from solid waste would forecast to be 233 $MTCO_2e$ per year.

TABLE 4.8-12: SOLID WASTE SOURCE GHG EMISSIONS

Land Use	Unmitigated MTCO2e per year
Apartment Low Rise	219
Retail	13
Park	<1
Total	**233**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

Water Consumption and Wastewater Emissions

California's water conveyance system is energy intensive, with electricity used to pump and treat water. The Project would result in indirect GHG emissions due to water consumption and wastewater generation. Water consumption and wastewater generation, and their associated emissions, are

calculated based on the square footage of the proposed uses, using CalEEMod data. As shown in **Table 4.8-13: Water Source GHG Emissions**, the Project's water and wastewater GHG emissions would forecast to be 119 $MTCO_2e$ per year.

TABLE 4.8-13: WATER SOURCE GHG EMISSIONS

Land Use	Unmitigated MTCO2e per year
Apartment Low Rise	110
Retail	9
Park	0
Total	**119**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

Refrigerants

CalEEMod quantifies common refrigerant GHGs used in air conditioning and refrigeration equipment, some of which are HFCs. This includes refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime. As shown in **Table 4.8-14: Refrigerant GHG Emissions**, the Project's GHG emissions from refrigerants would be 1 $MTCO_2e$ per year.

TABLE 4.8-14: REFRIGERANT GHG EMISSIONS

Land Use	Unmitigated MTCO2e per year
Apartment Low Rise	1
Retail	<1
Park	0
Total	**1**

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

Total Emissions

As shown in **Table 4.8-15: Operational GHG Emissions**, the Project is forecasted to generate a total of 7,983 $MTCO_2e$ per year as a result of buildout, accounting for the operation of 950 residential dwelling units, 40,000 square feet of commercial uses, parks, and Del Sol High School operating at full capacity of 2,500 students.

TABLE 4.8-15: OPERATIONAL GHG EMISSIONS

Source	Proposed Project $MTCO_2e$ per year[a]	Del Sol High School $MTCO_2e$ per year[b]	Total
Construction (amortized)	254	98	352
Mobile	1,057	3,259	4,316
Area	12	<1	12
Energy	1,928	726	2,654

TABLE 4.8-15: OPERATIONAL GHG EMISSIONS			
Source	Proposed Project $MTCO_2e$ per year[a]	Del Sol High School $MTCO_2e$ per year[b]	Total
Water	119	165	284
Waste	233	229	462
Refrigerants	1	<1	1
Total	**3,604**	**4,379**	**7,983**

Notes: $MTCO_2e$ = metric tons of carbon dioxide emissions.

Source: Meridian Consultants. *Air Quality, Greenhouse Gas, and Energy Study*. **Appendix E.**

It should be noted that each source category of GHG emissions from the Project would be subject to a number of regulations that would directly or indirectly reduce climate change-related emissions:

- Stationary and Area Sources: Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- Energy: Both construction and operational activities associated with the Project would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50% of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.
- Transportation: Both construction and operational activities associated with the Project would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.
- Building Structures: Operational efficiencies would be incorporated into the Project that reduce energy use and waste, as mandated by CAL Green, such as use of energy efficient windows and construction materials.
- Water and Wastewater Use: The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- Major appliances: The Project would include major appliances that are regulated by CEC requirements for energy efficiency.
- Solid Waste Management: The Project would be subject to solid waste diversion policies that reduce GHG emissions, such as the City's recycling program.

As discussed under **Impact GHG-2**, the Project adheres to regulatory compliance measures, including current building efficiency standards, that would reduce the Project's GHG emissions profile. The analysis below shows that the Project would not conflict with applicable plans including the City's CAAP, SCAG's 2024-2050 RTP/SCS, and the 2022 Scoping Plan. In addition, the Project Site's proximity to mass transit would further reduce what emissions are produced through the above regulations and applicable air quality plans. As such, the Project would have a less than significant direct or indirect GHG impact on the environment.

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

Compliance with applicable GHG emission reduction plans would result in a less than significant project-level and cumulative impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the regulations and policies outlined in CARB's 2022 Scoping Plan Update, SCAG's Connect SoCal, or the City's CAAP. Key regulations incorporated into this analysis include the California Code of Regulations, Title 20 and Title 24.

2022 Scoping Plan Update

As discussed above, jurisdictions that want to take meaningful climate action, such as preparing a non-CEQA-qualified CAP, or individual measures aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, Appendix D of the 2022 Scoping Plan Update includes a non-exhaustive list of GHG reduction strategies that can be implemented by local governments within the three priority areas (as laid out in the Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas).[77] A detailed assessment of the applicable goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the 2022 Scoping Plan action to have 100% of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

- **Convert local government fleets to zero emission vehicles (ZEV)**

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100% of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030.[78] This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The City's CAAP includes the goal of converting the municipal fleet to zero emissions, and the City's sustainable Transportation Plan identifies the installation of EV chargers throughout the City as a

77 CARB. Table 1 of Appendix D. *2022 Scoping Plan Update*. November 2022.

78 California Public Resources Code Section 25229(a) (West 2025).

method to create a sustainable transportation environment.[79] These goals would be consistent with the Scoping Plan goals of the transitioning to EVs. Although this measure mainly applies to City fleet, the Project would comply with CALGreen residential requirements, which includes 10% of parking spots being EV capable and 25% of parking sports being EV ready.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans**

The State has adopted AB 1236 and AB 970,[80] which require cities to adopt streamline permitting procedures for EV charging stations. CALGreen requires most new construction to designate 30% of new parking spaces as capable of supporting future electric vehicle supply equipment (EVSE).[81] This would exceed the CALGreen 2022 requirements of 20% of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10% of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25% of EV capable parking spaces which is approximately 5% of total parking spaces.

Although this measure mainly applies to City fleet, the Project would be designed in compliance with CALGreen requirements, which requires 10% of parking spots being EV capable and 25% of parking sports being EV ready.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density

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79 City of Oxnard. *Sustainable Transportation Plan*. https://www.oxnard.gov/public-works/traffic-engineering/sustainable-transportation-plan. Accessed September 2024.

80 California Government Code Sections 65850.7 & 65850.71.

81 California Green Building Standards Code (CALGreen), tit. 24, pt. 11, Sections 4.106.4, 5.106.5.3 & Tables 5.106.5.3.1, 5.106.5.3.6 (2022) (as supp. eff. July 1, 2024). https://codes.iccsafe.org/s/CAGBC2022P1.

residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2024–2050 RTP/SCS (Connect SoCal). Connect SoCal's "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Please refer below for additional discussion of consistency with Connect SoCal.

The Project represents infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in Connect SoCal. The Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, vehicle miles traveled (VMT), and GHG emissions. Specifically, the Project Site is located within walking distance of existing residential and commercial uses. The Project Site is served by the City of Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol. These Class II bike lanes connect the Project to residential, commercial, and employment areas to the north, south, east, and west of the Project. The City of Oxnard is also served by the Gold Coast Transit. Within 0.5 miles the project vicinity, there are bus stops along #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). Additionally, the Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations within the Project Site vicinity, as listed above. Therefore, the Project would be consistent with these reduction strategies.

SCAG 2024–2050 Regional Transportation Plan/ Sustainable Communities Strategy (Connect SoCal)

A discussion of the Project's consistency with the policies applicable to individual development projects in Connect SoCal is presented in **Table 4.8-16: Project Consistency with SCAG Connect SoCal Goals and** , below. As shown in **Table 4.8-16**, the Project would not conflict with the Connect SoCal.

TABLE 4.8-16: PROJECT CONSISTENCY WITH SCAG CONNECT SOCAL GOALS AND POLICIES

Goals and Policies	Consistency Analysis
Mobility: Build and maintain an integrated multimodal transportation network	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**Consistent**. The Project would support this goal by complying with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CALGreen standards. The proposed Project would also include solar panels to further reduce air quality and GHG emissions.

TABLE 4.8-16: PROJECT CONSISTENCY WITH SCAG CONNECT SOCAL GOALS AND POLICIES

Goals and Policies	Consistency Analysis
Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**Consistent**. The Project would support this goal by improving the viability of alternative forms of transportation through higher density development. Moreover, the Project is served by the nearby existing transit services, including Gold Coast Transit, which has stops for multiple bus routes within 0.5 miles of the Project Site including #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). Additionally, the Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations within the Project Site vicinity. The Project Site is also served by Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol. The location of the Project encourages use of a variety of transportation options, including walking, biking and using public transit.
Support planning for people of all ages, abilities, and backgrounds.	**Consistent**. The proposed Project would be consistent with the City of Oxnard 2030 General Plan for development of an urban village, which requires a minimum of 15% affordable housing units. Additionally, the proposed parks would be developed to have activities for all ages.
Communities: Develop, connect and sustain livable and thriving communities	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	**Consistent**. As discussed above, the Project is served by Gold Coast Transit, which has stops for multiple bus routes within 0.5 miles of the Project Site including #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). Additionally, the Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations within the Project Site vicinity. The Project Site is also served by Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol. This would encourage use of a variety of transit options, including walking, biking, and use of public transit, which would increase mobility and reduce travel distance. The proposed Circulation would allow there to be greater connection to other parts of the City compared to existing conditions.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	**Consistent**. The proposed Project is consistent with the City of Oxnard 2030 General Plan for development of an urban village, which requires a minimum of 15% affordable housing units.
Environment: Create a healthy region for the people of tomorrow	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	**Consistent**. This strategy is directed towards SCAG and is not specifically applicable to the Project. The Project would support this goal as an infill development, increasing housing options in an area served by existing transit options including the bus stops and existing bike baths.

TABLE 4.8-16: PROJECT CONSISTENCY WITH SCAG CONNECT SOCAL GOALS AND POLICIES

Goals and Policies	Consistency Analysis
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	**Consistent**. While not necessarily applicable on a project-specific basis, the Project would be served by the City's existing transportation network, including Gold Coast Transit, which has stops for multiple bus routes within 0.5 miles of the Project Site including #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). The proposed Project would also reconstruct the existing bus stop along Rose Avenue fronting Del Sol Park as well as construct new bus stops at the southwest corner of Rose and Camino del la Luna, the northeast corner of Rose and Jacinto Drive, the northeast corner of Rose and Cesar Chavez Drive, and the southwest corner of Rose and Cesar Chavez Drive. The Project Site is also served by Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol. The location of the Project in encourages use of a variety of transportation options, including walking, biking, and using public transit which would reduce the reliance on single occupancy vehicles and reduce air quality and greenhouse gas emissions.
Conserve the region's resources.	**Consistent**. The Project would comply with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CAL Green standards.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region	
Improve access to jobs and educational resources.	**Consistent**. While not necessarily applicable on a project-specific basis, the Project is served by Gold Coast Transit with bus stops along multiple bus routes surrounding the Project Site and existing bicycle paths. The location of the Project in encourages use of a variety of transportation options, including walking, biking, and using public transit which would improve access to surrounding resources Surrounding uses in the vicinity of the Project Site include residential uses, commercial uses, and business park uses to the north, residential, commercial, and industrial uses to the south, residential uses and industrial uses to the east, and residential and school uses to the west.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Consistent**. This goal is directed toward SCAG and is not specifically applicable to the Project. Nonetheless, the Project Site's location near existing transit services and bicycle infrastructure would promote a variety of transportation options to minimize environmental health impacts while fostering continued economic growth.

Source: SCAG. *2024–2050 RTP/SCS*. April 4, 2024.

City of Oxnard Climate Action and Adaptation Plan

Table 4.8-17: Project Consistency with Applicable CAAP Strategies summarizes the Project's consistency with applicable GHG reductions from local strategies listed in the CAAP. As shown therein, the Proposed Project would be consistent with the GHG emission reduction strategies contained in the City's CAAP.

TABLE 4.8-17: PROJECT CONSISTENCY WITH APPLICABLE CAAP STRATEGIES

Goals and Policies	Consistency Analysis
Green Building (B)	
• B2: Electrify Buildings	**Consistent.** The Project would be designed and operated to meet the applicable requirements of CALGreen (Title 24, Part 6) requirements for electrification of new buildings.
Transportation (T)	
• T1: Expand Zero Emission Vehicle (ZEV) Charging and Fueling Infrastructure	**Consistent**. The Project would be designed to comply with CALGreen residential requirements, which includes 10% of parking spots being EV capable and 25% of parking sports being EV ready.
Water Conservation and Reuse (W)	
• W1: Increase Water Conservation and Reuse	**Consistent**. The Project would incorporate water conservation features, such as low-flow fixtures, required pursuant to the current California Plumbing Code and CALGreen. Furthermore, current CALGreen requirements require a 20% increase in indoor water use efficiency relative to previous building requirements.
Recycling and Organic Waste Diversion	
• R1: Recycling and Organic Waste Diversion	**Consistent**. The Project would be subject to the requirements of the statewide commercial recycling program. Senate bill (SB) 341 established a statewide goal of diverting at least 75% of solid waste from landfills by 2020. Additionally, SB 1383 requires organics collection for all business and multifamily complexes. Compliance with existing City and State programs would achieve consistency with this measure.

As detailed above, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, resulting in less than significant impacts.

City of Oxnard General Plan

Table 4.8-18: Project Consistency with Applicable City of Oxnard General Plan Goals and Policies summarizes the Project's consistency with applicable GHG reduction goals and policies in

the City's General Plan. As shown therein, the Proposed Project would be consistent with the GHG emission reduction strategies contained in the City's General Plan.

TABLE 4.8-18: PROJECT CONSISTENCY WITH APPLICABLE CITY OF OXNARD GENERAL PLAN GOALS AND POLICIES

Goals and Policies	Consistency Analysis
Goal SC-4: Implementation of the California Green Building Code.	
Policy SC-4.1: Green Building Code Implementation. Implement the 2010 California Green Building Code as may be amended (CALGREEN) and consider recommending and/or requiring certain developments to incorporate Tier I and Tier II voluntary standards under certain conditions to be developed by the Development Services Director.	**Consistent**. The Project would support this goal by complying with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CALGreen standards. The proposed Project would also include solar panels to further reduce air quality and GHG emissions.
Goal CD-1: A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.	
Policy CD-1.2: Infill Development, Priority to Mixed Use. Promote the efficient use of larger vacant parcels and vacant areas of the City by encouraging infill development, with a priority to mixed uses that reduce vehicle trips and GHG emissions and promote sustainable development goals and objectives.	**Consistent**. The proposed Project is an infill development and is located in a portion of the City near schools and job opportunities. The Project's proposed circulation system would further connect portions of the City compared to existing conditions. The Project is served by Gold Coast Transit with bus stops along multiple bus routes surrounding the Project Site and existing bicycle paths. Additionally, the Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations within the Project Site vicinity.
Policy CD-1.4: Transportation Choices. Promote the application of land use and community designs that provide residents with the opportunity for a variety of transportation choices (pedestrian, bicycle, transit, automobile).	**Consistent**. The Project is served by Gold Coast Transit with bus stops along multiple bus routes surrounding the Project Site and existing bicycle paths. Additionally, the Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations within the Project Site vicinity.
Policy CD-1.9: Commute Reduction. Minimize the commuting distances between residential concentrations and employment centers by encouraging the development of mixed land uses in appropriate areas.	**Consistent**. As discussed above, the proposed Project is an infill development and is located in a portion of the City near schools and job opportunities. The Project's proposed circulation system would further connect portions of the City compared to existing conditions. The Project is served by Gold Coast Transit with bus stops along multiple bus routes surrounding the Project Site and existing bicycle paths. Additionally, the Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations within the Project Site vicinity.
Goal CD-8: Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.	
Policy CD-8.1: Limiting Development. Continue to limit development to those areas that can be served by existing or planned utilities, transportation, and service systems.	**Consistent**. As discussed in **Section 4.6: Energy** and **Section 4.18: Utilities**, the Project would be served by the City's existing utility and service systems. The Project would also be served by Gold Coast Transit

TABLE 4.8-18: PROJECT CONSISTENCY WITH APPLICABLE CITY OF OXNARD GENERAL PLAN GOALS AND POLICIES

Goals and Policies	Consistency Analysis
	with bus stops along multiple bus routes surrounding the Project Site and existing bicycle paths.
Goal CD-10: Neighborhoods and urban villages with a distinct sense of place.	
Policy CD-10.1: Human-Scale Development. In the evaluation of development proposals, require urban development on a human scale, by emphasizing the pedestrian experience over the movement and storage of vehicles.	**Consistent**. The Project would be served by the City's existing transportation network, including Gold Coast Transit, which has stops for multiple bus routes within 0.5 miles of the Project Site including #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). Additionally, the Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park, and the development of several new bus stop locations within the Project Site vicinity. The Project Site is also served by Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol.
Goal ICS-6: Public transit system that serves the needs of the residents and workers of Oxnard.	
Policy ICS-6.1: Transit Facilities for New Developments. Include transit facilities such as bus benches, shelters, pads or turnouts, where appropriate, in new development improvement plans.	**Consistent**. The Project would be served by the City's existing transportation network, including Gold Coast Transit, which has stops for multiple bus routes within 0.5 miles of the Project Site including #4B Route (North Oxnard), #2 Route (Downtown Oxnard), #15 Route (Esplanade-El Rio-St. Johns Medical Center), and #19 Route (OTC – 5th – Gonzales Road). The Project would reconstruct an existing bus stop along Rose Avenue fronting Del Sol Park and include the construction of several new bus stop locations at a few intersections (Rose Avenue and Camino de la Luna, Rose Avenue and Jacinto Drive (formerly Central Street), Rose Avenue and Cesar Chavez Drive). Additionally, the Project would construct a bus pull-out at the northeast corner of Rose Ave and Camino Del Sol and relocate furniture and signage from the southeast corner.
Goal ICS-8: Safe bicycle and pedestrian circulation throughout the City.	
Policy ICS-8.4: New Development Requires Bicycle Improvements. Where designated, proposed developments to include bicycle paths and / or lanes in their plan and to clearly indicate possible bicycling hazards such as speed bumps and storm drain inlet grates in parking lots.	**Consistent**. The Project Site is served by Oxnard Bikeway system, with Class II bike lanes located along Gonzales Road, Rose Avenue, and Camino Del Sol. The Project would add Class II bike lanes Cesar Chavez Drive and Gibraltar Street and connect them to a multi-use path west of the Project area. Additionally, the Project would include dedicated 5-foot-wide Class II bike lanes on several neighborhood streets, including Milagro Place, Concha Street, Prado Way, and Williams Drive. The Project would not interfere with planned in-street bicycle facilities that may be contemplated either as an implementation of the Northeast Community Specific Plan (NECSP) or the Bicycle and Pedestrian Master Plan.

TABLE 4.8-18: PROJECT CONSISTENCY WITH APPLICABLE CITY OF OXNARD GENERAL PLAN GOALS AND POLICIES

Goals and Policies	Consistency Analysis
Goal ICS-11: Water supply, quality, distribution, and storage adequate for existing and future development.	
Policy ICS-11.6: Water Conservation and/or Recycling Connection as Mitigation. Require the use of water conservation offset measures (efficient low flow fixtures and irrigation systems, drought tolerant landscaping, leak detection programs, water audits, and public awareness and education programs) and/or proportional contributions to recycled water production and/or conveyance infrastructure related to the GREAT Program as mitigation for water supply shortage as determined by a Water Supply Assessment, CEQA documentation, or similar analysis as part of new or master plan development review.	**Consistent**. The Project would incorporate water conservation features, such as low-flow fixtures, required pursuant to the current California Plumbing Code and CALGreen. Furthermore, current CALGreen requirements require a 20% increase in indoor water use efficiency relative to previous building requirements.
Policy ICS-11.7: Water Wise Landscapes. Promote water conservation in landscaping for public facilities and streetscapes, residential, commercial and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new and replacement landscaping.	**Consistent**. The proposed Project would comply with Section 22-242 of the City's Municipal Code, which requires the use of water wise plants. The Project would also comply with CALGreen and the current California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO), which requires the use of efficient irrigation systems.

4.8.6 Cumulative Impacts

The City's 2030 General Plan EIR determined that development allowed by the General Plan could result in an increase of GHG emission that could potentially conflict with the state AB 32 goals related to greenhouse gas emissions and would have a significant impact prior to mitigation. This conclusion was based on increases in on-road vehicles and stationary sources due to new developments.

As detailed above, the proposed Sub-Neighborhood Plan would be consistent with the applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases. The Project would adhere to regulatory compliance measures, including current building efficiency standards, that would reduce the Project's GHG emissions profile. In addition, the Project Site's proximity to mass transit would further reduce what emissions are produced through the above regulations and applicable air quality plans. Therefore, the Project would not contribute to any significant cumulative impacts.

4.8.7 Level of Significance Without Mitigation

Impacts would be less than significant without mitigation.

4.8.8 Mitigation Measures

No mitigation measures are required.

4.8.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates the potential to encounter hazards and hazardous materials within the Project Site and surrounding area during the development of the proposed Project. As discussed in the Initial Study (**Appendix A**), impacts associated with the following Thresholds were determined to be less than significant: d) a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, e) located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and g) expose people or structures, either directly or indirectly, to a significant loss, injury or death involving wildfires. Therefore, further detailed evaluation is not provided for these topics because the Project will not create significant impacts in those areas.

The analysis below is partially based on the Evaluation of Risk Potential by TRAK Environmental Group, Inc. (**Appendix M**), which provides an evaluation of potential hazards and hazardous materials within the Project Site and surrounding area based on previous hazards assessments completed for Areas B and C and a hazards assessment conducted for Area A.

4.9.1 Background

Project Site History and Existing Conditions

The proposed Sub-Neighborhood Plan (proposed Project) defines three planning areas within the Project Site. Area A, approximately 44.5 acres, is located in the northern portion of the site and consists of undeveloped land previously disturbed by agricultural use. Area B, approximately 50.7 acres in the central and southeastern portions, is developed with Del Sol High School. Area C, approximately 11.8 acres in the southwestern portion, contains the Maulhardt family residence, barn, cottages, outbuildings, other agricultural structures, and a lemon orchard that is no longer actively cultivated.

In 2019, the Oxnard Union High School District (OUHSD) prepared and certified an Environmental Impact Report (EIR) for the New High School No. 8 Project (SCH #2019029101), which evaluated the development of Del Sol High School within Area B. As part of that EIR, hazard assessments were conducted for both Areas B and C, but not for Area A, also referred to as the North Parcel. The summary of the history of the Project Site and existing conditions related to hazards is organized by planning area in response to the scope of the prior and current hazard assessments.

Del Sol High School (Area B)

Phase I Environmental Site Assessment

Prior to the development of Del Sol High School, Area B was previously used for agricultural operations. A Phase I Environmental Site Assessment (ESA) prepared by Tetra Tech in 2018 was conducted for the site to determine if there were any identified Recognized Environmental Conditions (RECs) regarding potential soil impacts from former pesticide applications associated

with former agricultural land use practices. The property had been farmed since at least 1869, and legal pesticides, including organochlorine pesticides (OCP) or heavy metals, had been commonly used for crop production from the 1940s through the 1960s, and had been detected in soil samples collected on property that was formerly part of the Maulhardt Ranch. The Phase I ESA identified six RECs that required additional assessment:[1]

1. Potential toxic soil gas from potential formation leakage from the Oxnard Oil Field;
2. Potential residual organochlorine pesticides (OCPs) and arsenic in soil from former pesticide use, and semi volatile organic compounds (SVOCs), polyaromatic hydrocarbons (PAHs), diesel range total petroleum hydrocarbons (TPHd), and motor oil range total petroleum hydrocarbons (TPHmo) in soil from fuel oil in smudge pots that were formerly used for frost abatement as part of the agricultural production activities at the Site;
3. Potential impacts to shallow soil, soil gas, and groundwater from VOCs, gasoline range total petroleum hydrocarbons (TPHg), and TPHd in fuels formerly stored in above ground storage tanks (ASTs) and underground storage tanks (USTs), and from equipment maintenance activities in the area of the Site adjacent to the Maulhardt Property farmyard and residential areas;
4. Potentially hazardous substances and petroleum products that contain VOCs, TPHg, TPHd, and TPHmo that may have been used and stored in the Tin Shed, Horse Barn, Garage, and Storage Shed on the Maulhardt Property that may have impacted shallow soil, soil gas, and groundwater in the areas of the Site adjacent to the Maulhardt Property farmyard area;
5. Polychlorinated Biphenyls (PCB) soil contamination from a pole-mounted electrical transformer located onsite along the southern Site boundary along Camino Del Sol; and
6. Potentially hazardous water transmission pipelines identified within 1,500 feet of the Site.

The Phase I ESA recommended that a Preliminary Environmental Assessment (PEA) be performed under California Department of Toxic Substances Control (DTSC) oversight to evaluate these RECs.[2]

Preliminary Environmental Assessment

The PEA included several gas, soil, and groundwater samples throughout the Project Site at various depths to evaluate the potential risk of the RECs. The results of the PEA were:

- OCPs were detected at concentrations exceeding the PEA screening levels at 34 sample locations including toxaphene in all 34 locations and dieldrin at three locations.
- Human health screening evaluation found that assumed exposures resulted in a maximum cumulative carcinogenic risk estimate (8×10^{-6}) that exceeded the point of departure (target risk level) of 1×10^{-6} for potential residential receptors.

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1 Tetra Tech. *Environmental Impact Report New High School No. 8*. 2019.

2 TRAK Environmental Group, Inc. (TRAK). *Evaluation of Risk Potential*. January 2025. **Appendix M**.

- Estimated cumulative cancer risk associated with potential exposures to soil based on 95% Upper Confidence Limits (UCLs) for pesticides was determined to be 4×10^{-6}, which is within the low end of the USEPA target risk range of 10^{-4} to 10^{-6} and exceeds the target risk levels of 1×10^{-6} for potential residential receptors.
- Surface soil sampling completed adequately defined the lateral extent of OCP impacted soil at concentrations exceeding screening levels. Additional sampling was recommended to assess the depth of soil impacted with OCPs, specifically toxaphene and dieldrin, with concentrations exceeding screening levels.

The PEA findings in regard to other potential concerns included:

- Soil vapor not impacted by potential emissions from Oxnard Oil Field, and/or petroleum products that may have been released from ASTs and USTs formerly located at adjacent Maulhardt Ranch farm maintenance yard.
- No significant impacts from arsenic in surface soil were identified.
- Surface soils did not appear to have been significantly impacted by smudge pot fuel.
- Subsurface soil, and groundwater, did not appear to have been significantly impacted by VOCs, TPHg and TPHd from petroleum products that may have been released from ASTs and USTs and farm maintenance activities.

DTSC approved this PEA in March 2019.[3] Following completion of the PEA, DTSC required additional work to evaluate both residential and school scenarios and to delineate vertical extent of OCP impacts. The PEA exceedances were identified relative to residential receptor screening levels, not school thresholds. The subsequent Supplemental Site Investigation detailed below included risk characterization of both residential and school-based receptors.

Supplemental Site Investigation

A Supplemental Site Investigation (SSI) was conducted in February 2019 to delineate the vertical extent of OCPs in soil at concentrations that exceeded the screening levels, and subsurface soil samples were collected from the PEA surface soil sample locations with the 10 highest surface soil OCP concentrations previously reported. Samples were collected from the 10 locations at depths of 1.0 feet below ground surface (bgs), 1.5 feet bgs, and 2.0 feet bgs, and analyzed for OCPs. Toxaphene was detected at concentrations greater than screening levels (490 micrograms per kilogram (ug/kg)) at depths of 1.0 feet (9 locations) and 1.5 feet (2 locations). The investigation concluded that the maximum depth of OCP-impacted soil at concentrations exceeding screening levels had been defined and is between approximately 1.5 and 2.0 feet bgs.

3 TRAK. *Evaluation of Risk Potential*. **Appendix M**.

Risk characterization was conducted for potential residential and school-based student receptors using the ratio of soil concentrations (maximum detected and also 95% UCL to applicable screening levels, and findings included:

- Estimated cumulative risks for residential scenario based on maximum detected concentrations indicate that toxaphene levels detected in soil result in estimated risk that exceed the residential target risk level (1×10^{-6}).
- Estimated cumulative risks for school-based student scenario (range from 2×10^{-7} to 4×10^{-7}) were well below the student target risk level (1×10^{-6}).
- Estimated cumulative risks for school-based teacher scenario (range from 7×10^{-7} to 2×10^{-6}) were well below the teacher target risk level (1×10^{-5}).
- Estimated risks based on the 95% UCL concentrations and modified soil screening level for toxaphene were equal to, or lower than the low end of the US EPA target risk range of 1×10^{-6} to 1×10^{-4}.
- Human health risk evaluation indicated that it is unlikely that the chemicals of potential concern (COPCs) detected in soil gas and soil are present at levels that would be expected to result in adverse health effects under the school-based scenarios evaluated, and a determination of No Further Action recommended.

DTSC (April 26, 2019) concurred with the SSI conclusions and recommendation for No Further Action determination for the school site and approved the SSI.[4]

Water Pipeline Hazard Assessment

A Water Pipeline Hazard Assessment (WPHA) was completed to fulfill California Department of Education (CDE) school Site selection criteria requirements under CCR Title 5 Section 14010 et seq. and Education Code Section 17213 et seq. The WPHA concluded that a potential break in any of the water pipelines located within 1,500 feet of the site would not result in significant flooding at the school.[5]

Southwest Neighborhood (Area C)

Based on recommendation of the Phase I ESA (Tetra Tech, Inc., 2018), soil investigation at Area C was conducted in 2018 by Applied Environmental Technologies Inc (AET), with results presented in the report, Limited Phase II Environmental Site Assessment Maulhardt/OUHSD Property on North Rose Avenue, Oxnard, California. May 17, 2018.

Limited Phase II ESA

The Phase II investigation completed in April 2018 included four borings to depths of 20 feet bgs at locations of former USTs and ASTs, and six soil samples (0.5 feet bgs) collected in the vicinity of a

4 TRAK. *Evaluation of Risk Potential*. **Appendix M**.

5 Tetra Tech. *Environmental Impact Report New High School No. 8*.

workshop and former pesticide mixing area in the maintenance yard in Area C. Investigation findings included:

- No detections of TPH (gasoline or diesel) or VOCs were identified at UST locations to depths of 20 feet bgs, and only low-level TPH oil-range hydrocarbons detected at one location at 5 feet bgs.
- No detections of TPH or herbicides were identified at AST locations to depths of 3 feet.
- Two OCP analytes were detected at concentrations greater than commercial DTSC-SL, including dieldrin in one sample (202 ug/kg) and toxaphene in two samples (1,710 and 3,230 ug/kg).

The Limited Phase II ESA report did not include risk characterization. In order to better evaluate the Limited Phase II sampling results in comparison to data of the PEA and SSI, risk characterization was conducted using the same methodology used in the PEA and SSI. Assumptions included use of DTSC-SL (commercial land uses) as screening criteria for COPCs (dieldrin and toxaphene), and estimation of risk in regard to maximum concentration detected, and also for 95% UCL. Findings of risk characterization are summarized:

- Estimated cumulative risks for commercial scenario based on maximum detected concentrations indicate that toxaphene and dieldrin levels detected in soil result in estimated risk of about 4.9×10^{-6}.
- Estimated cumulative risks for commercial scenario based on 95% UCL concentrations indicate that toxaphene and dieldrin levels detected in soil result in estimated risk of about 3.4×10^{-6}.
- The estimated cumulative risks at the Southwest Neighborhood are within the low end of the USEPA target risk range of 1×10^{-4} to 1×10^{-6}, similar to risks estimated for the High School site.

Because of similarity in characterized risk, the conclusion applicable to the Del Sol High School can also be applied to the Southwest Neighborhood, being that it is unlikely that COPCs detected in soil are present at levels that would be expected to result in adverse health effects under the scenarios evaluated, and determination of No Further Action warranted.[6] Although the Phase II investigation for Area C applied only commercial screening levels, the detected concentrations and estimated risks were comparable to those at the High School site where residential receptors were evaluated, and therefore are considered acceptable for residential use as well.[7]

Northern Neighborhood (Area A)

Soil sampling was conducted in the North Neighborhood to supplement previous testing performed for the adjacent Del Sol High School and Southwest Neighborhood. Since both areas had similar agricultural use histories involving crop production, the same grid-based sampling method was used. The sampling followed guidelines from the DTSC for testing former agricultural properties.

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6 TRAK. *Evaluation of Risk Potential*. **Appendix M**.

7 TRAK. *Evaluation of Risk Potential*. **Appendix M**.

A total of 55 soil sample locations were established, with samples collected from a depth of 0.5 feet. For OCPs, every four samples were combined into one sample for lab analysis, resulting in 14 composite samples. For arsenic, one discrete sample from each group of four was selected for separate analysis. All testing was conducted at a certified laboratory using EPA-approved methods.

Results showed the presence of several pesticide residues, primarily DDT and its breakdown products (DDE and DDD), as well as Toxaphene, which was found in all samples. DDT, DDE, and DDD were found at concentrations well below the DTSC health-based screening levels (DTSC-SLs) for residential land use. Other pesticides like Chlordane, Dieldrin, and Endosulfan were found at concentrations well below the DTSC-SLs for residential land use. However, Toxaphene slightly exceeded the residential DTSC-SL of 450 µg/kg in two samples, with concentrations of 650 and 740 µg/kg. These levels are still significantly below the DTSC-SL for weathered toxaphene (1,900 µg/kg), which is the applicable standard given its historical use prior to the 1990 ban.

Arsenic was detected in all soil samples, with concentrations ranging from 3.5 to 5.9 mg/kg. These values fall within the range typically associated with natural background levels in Southern California and are well below the upper-end background threshold of 12 mg/kg, suggesting no evidence of arsenic contamination.

A risk assessment was conducted to evaluate potential health risks from exposure to the OCPs detected. Both cancer risk and non-cancer health risks, measured by the Hazard Index, or HI, were calculated using two methods: the maximum detected concentrations and the 95% UCL. Based on maximum concentrations, the cumulative cancer risk was estimated at 2.1×10^{-6}, while the UCL-based estimate was 1.2×10^{-6}. These values are within or just slightly above the lower end of the U.S. EPA's target risk range (10^{-6} to 10^{-4}) for residential exposure. The cumulative non-cancer hazard index was 0.16 based on maximum concentrations and 0.09 using the UCL—both well below the threshold of concern (HI = 1).

In conclusion, while some pesticide residues were detected in Area A's soil due to historical agricultural use, the concentrations are generally low and are not considered a significant health concern for this reason. The estimated risk levels are comparable to or lower than those of the Del Sol High School site, for which no further action was recommended. Arsenic levels are consistent with natural background conditions and are not expected to pose health risks.

4.9.2 Regulatory Framework

Key federal, State, local laws, regulations, and policies that pertain to hazards and hazardous materials for the Project are summarized below. They provide the regulatory framework for addressing all aspects of hazards and hazardous materials that would be affected by construction and implementation of the Project.

Federal

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) gives the EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid waste. The 1986 amendments to RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as a Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries, and provided federal authority to respond directly to releases, or threatened releases, of hazardous substances that may endanger public health or the environment. CERCLA:

- Establish prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provide for liability of persons responsible for releases of hazardous waste at these sites; and
- Establish a trust fund for cleanup when no responsible party can be identified.

The law authorizes two kinds of response actions:

- Short-term removals: actions may be taken to address release or threatened release requiring prompt response; or
- Long-term remedial response actions: permanently and significantly reduce the dangers associated with release or threat of release of hazardous substances that are serious, but not immediately life threatening. These actions can be conducted only at sites listed on EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

Department of Transportation Hazardous Materials Regulations (49 CFR 100-185)

The Department of Transportation (DOT), the Federal Highway Administration (FHWA), and the Federal Railroad Administration (FRA) regulate the transportation of hazardous materials at the federal level. The Hazardous Materials Transportation Act requires carriers to report accidental releases of hazardous materials to DOT at the earliest practical moment. Other incidents that must be reported include deaths, injuries requiring hospitalization, and property damage exceeding

$50,000. Enforcement of DOT regulations is shared by each of the following administrations under delegations from the Secretary of the DOT:

- Research and Special Programs Administrations – Responsible for container manufacturers, reconditioners, and re-testers, and shares authority over shippers of hazardous materials.
- FHWA – Enforces all regulations pertaining to motor carriers.
- FRA – Enforces all regulations pertaining to rail carriers.

Hazardous Materials Regulations (CFR Titles 10, 29, 40, and 49)

The EPA, the Occupational Safety and Health Administration (OSHA), and the United States Department of Transportation (DOT) regulate hazardous materials. Federal regulations for hazardous materials are primarily found in CFR Titles 10, 29, 40, and 49. In particular, CFR Title 40 Part 261 governs the identification and listing of hazardous wastes, their storage, and disposal.

Federal laws include the following major statutes (and regulations issuing from them):

- **Resources Conservation and Recovery Act (RCRA)**, Hazardous waste management;
- **Hazardous and Solid Waste Amendments Act (HSWA)**, Hazardous waste management;
- **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**, Cleanup of contamination and funding for responses;
- **Superfund Amendments and Reauthorization Act (SARA)**, Cleanup of contamination; and
- **Emergency Planning and Community Right-to-Know (SARA Title III / EPRCRA)**, Business inventory, emergency response planning, and notification.

The EPA is the primary federal agency responsible for the implementation and enforcement of hazardous materials regulations. In most cases, enforcement of environmental laws and regulations established at the federal level is delegated to State and local environmental regulatory agencies.

Federal OSHA (29 USC 651 et seq.)

OSHA established requirements for workers involved in the handling, use, and disposal of hazardous materials, including emergency response, hazard communication, and personal protective equipment. The law also requires manufacturers to prepare safety data sheets (SDSs) which describe the proper use of hazardous materials) and provide SDSs to shippers, product end users, and workers.

Hazardous Waste Operations Emergency Response (HAZWOPER)

OSHA requires special training under 29 CFR 1910.120 for workers who handle hazardous materials and requires notification to employees who work in the vicinity of hazardous materials. HAZWOPER also requires employers to train personnel to respond to accidental releases of hazardous materials. OSHA also regulates lead and asbestos exposure as it relates to worker safety.

State

Government Code Section 65962.5

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites.

California Code of Regulations and California Health and Safety Code (HSC)

The CCR and the California HSC incorporate the requirements of the federal RCRA Subtitle I and set registration and permitting requirements, construction/operational standards, closure requirements, licensing of UST contractors, financial responsibility requirements, release reporting/corrective action requirements, and enforcement. Additionally, these provisions regulate the abatement process in the event of contamination of hazardous waste. Specifically, the California HSC establishes standards, regulations, and requirements for the installation, inspection, registration, maintenance, and abandonment of USTs.

Emergency Planning and Community Right-to-Know (Proposition 65)

These regulations require worker notification of hazardous substances in the workplace. Parts of Title 8 of CCR Sections 1532.1 and 1529 provide for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to lead and asbestos as well as regulating abatement and disposal of these materials.

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

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

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (27 CCR Division 1, Subdivision 4, Chapter 1, Sections 15100–15620)

Created by State legislation in 1993 to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities, the Unified Program legislation empowered CalEPA to grant qualifying local agencies oversight and permitting responsibility for the following emergency and management programs:

- Hazardous materials release response plans and inventories (business plans);
- California Accidental Release Prevention Program (CalARP);
- UST Program;

- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control and Countermeasure Plans;
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (tiered permitting) Programs; and California Uniform Fire Code: hazardous material management plans and hazardous material inventory statements.

The Ventura County Certified Unified Program Agency (CUPA) provides oversight for these programs in Ventura County and the Oxnard Fire Department administers these programs in the City.

Department of Toxic Substances Control

The Department of Toxic Substances Control (DTSC) is authorized by CalEPA to administer the hazardous waste laws and oversee remediation of hazardous wastes sites. Regulations require that DTSC "shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC)."[8]

The DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. Approximately 1,000 scientists, engineers, and specialized support staff ensure that companies and individuals handle, transport, store, treat, dispose of, and clean up hazardous waste appropriately. Through these measures, DTSC contributes to greater safety for all Californians and, thus, less hazardous waste reaches the environment. DTSC's role is limited to projects with State funding.

The waste facilities identified in HSC Section 25187.5 are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under the HSC, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.

State Water Resources Control Board (SWRCB)

The SWRCB regulates the handling, storage, and disposal of hazardous substances in construction projects. Permits and/or other action by the SWRCB may be required if contamination of water or soil occurs during buildout of proposed projects.

California Environmental Protection Act (CalEPA)

CalEPA is directly responsible for administrating the "Unified Program," which consolidates and coordinates the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs. The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of

8 California Government Code. Development Permits for Classes of Projects [65960 - 65964.1]. Section 65962.5.

formerly independently managed programs and is implemented at the local government level by Certified Unified Program Agencies.

Certified Unified Program Agency (CUPA)

Under the California Unified Hazardous Waste and Hazardous Material Management Regulatory Program, (Chapter 6.11, Division 20, Section 25404 of the Health and Safety Code), hazards/hazardous materials management is addressed locally through the CUPA.

A local CUPA is responsible for administering/overseeing compliance with the following programs, as required by State and federal regulations:

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

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

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) has set forth work requirements for disturbance of Asbestos-containing material (ACMs), including removal operations for all types of ACMs. In addition, the agency has developed standards for general industry and the construction industry hazardous waste operations and emergency response. Cal/OSHA ensures that employers must have controls to reduce and monitor exposure levels of hazardous materials and oversees an informational program describing any exposure during operations, as well as the inspection of drums and containers prior to removal or opening. Decontamination procedures and emergency response plans must be in place before employees begin working in hazardous waste operations.

Hazardous Waste Control Act

The Hazardous Waste Control Act (HWCA) is the State equivalent of RCRA and regulates the generation, treatment, storage, and disposal of hazardous waste.[9] This act implements the RCRA

9 California Department of Toxic Substances Control. *California Hazardous Waste and Hazardous Substances Law*. California Code of Regulations. Title 22. Division 4.5. Environmental Health Standards for the Management of Hazardous Waste.

"cradle-to-grave" waste management system in California but is more stringent in its regulation of non-RCRA wastes, spent lubricating oil, small-quantity generators, and transportation and permitting requirements, as well as in its penalties for violations. HWCA applies to the proposed Project because contractors will be required to comply with its hazardous waste requirements to reduce the possibility of spills.

Local

City of Oxnard General Plan Goals and Policies

The City of Oxnard 2030 General Plan Goals and Polices for hazards and hazardous materials most relevant to the proposed Project are as follows:

Chapter 4: Infrastructure and Community Services

Goal ICS-16 Residents and property protected from the use, transport, and disposal of hazardous materials.

Policy ICS-16.2 ***Hazardous Waste Audits***

Require a hazardous waste audit as part of the application procedure for proposed expansions or new development of commercial or industrial projects.

Policy ICS-16.3 ***Recycling of Hazardous Materials***

Continue to require the proper disposal and recycling of hazardous materials.

Goal ICS-21 High quality, well maintained school facilities for the residents of Oxnard.

Policy ICS-21.7 ***Buffer Areas Around Schools***

Review land use and use permit applications to provide where feasible a minimum of one-fourth (1/4) mile buffer area between schools and any industrial facilities that may emit hazardous vapors. A buffer zone meeting criteria of the Ventura County Agricultural Commissioner should be maintained where feasible between any school and any active agricultural operations.

Chapter 6: Safety Hazards

Goal SH-4 Emergency preparedness through the provision of adequate fire and police protection, infrastructure, emergency supply stockpiling, public education, EOC planning and procedures, and outreach programs.

Policy SH-4.6 ***Access and Evacuation Corridors***

Ensure that access and evacuation corridors are identified in the event of various types of minor and major emergencies.

Goal SH-7 Minimize risk associated with the transport distribution, use, and storage of hazardous materials.

Policy SH-7.2 ***Handling of Hazardous Materials***

Require that hazardous materials are used, stored, transported, and disposed of within the City in a safe manner and in compliance with local, State, and federal standards.

Policy SH-7.3 ***Designated Hazardous Materials Route***

Avoid, whenever possible, the routing of hazardous materials near residential, tourist, and recreational areas and maintain a hazardous material truck route in the office of the Traffic Engineer.

Policy SH-7.4 ***Limiting High Risk Land Uses***

Actively oppose uses being considered by other agencies that pose an unacceptably high risk to the health, safety, and welfare of the residents, workers, visitors, and the natural environment.

Policy SH-7.5 ***Implementing Ventura Couty Hazardous Waste Management Plan***

Implement the policies of the Ventura County Hazardous Waste Management Plan as they pertain to the Oxnard Planning Area.

Policy SH-7.6 ***Attraction/Retention of Clean Industries***

Seek to attract clean, non-polluting industries and maintain existing clean industries within the City, in terms of hazardous materials storage, production, and hazardous waste generation.

Policy SH-7.7 ***Increase Public Awareness***

Continue to seek methods to increase public awareness of and proper disposal methods for household hazardous waste.

Policy SH-7.8 ***Accident Prevention and Materials Substitution at City Facilities***

Seek expert advice to prevent accidental oil or other hazardous materials spillage and identification and substitution of non- or less-hazardous materials at City-owned facilities.

Policy SH-7.9 ***Sensitive Land Use Planning***

Do not allow residential construction or other sensitive land uses adjacent to any inactive landfill unless a thorough study of emissions from the facility is conducted and it is determined that no adverse health effects or significant odor impacts would occur. Alternatively, a safe buffer zone distance, based on analyses of worst case conditions, shall be established around any such site within which no sensitive land uses would be permitted.

Policy SH-7.11 ***Hazardous CUPA Materials Inventory***

Continue to require a hazardous materials inventory for businesses and other applicable parties as part of the Certified Unified Program Agency (CUPA) program.

Policy SH-7.12 ***Hazardous Materials Studies***

Ensure that the proponents of new development projects address hazardous materials concerns through the preparation of Phase I or Phase II hazardous materials studies for each identified site as part of the design phase for each project. Recommendations required to satisfy federal or State cleanup standards outlined in the studies will be implemented as part of the construction phase for each project.

4.9.3 Significance Thresholds

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project create a substantial hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment?

c. Would the project emit hazardous substances or handle hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school?

f. Would the project impair implementation of or physically interfere with an adopted emergency operations plan or Ventura County Operation Area response Protocol or City

of Oxnard emergency evacuation protocols?

4.9.4 Methodology

The analysis of potential hazards and hazardous materials impacts relies partially on the Evaluation of Risk Potential (**Appendix M**) which determined RECs within and adjacent to the Project Site, and tested screening levels of the RECs. Additionally, the development of the proposed Sub-Neighborhood Plan is compared to the City's Emergency Operations Plan to determine if the Project would impair or interfere with the plan.

4.9.5 Project Impacts

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact.

Construction Impacts

Construction of the Project will involve the use and storage of vehicle fuel, paints, solvents, and other acidic or alkaline solutions that require special handling, transport, and disposal. Debris encountered or generated during Project construction would include waste such as fluorescent bulbs, elevator equipment, and conventional waste.

All materials used during construction would be used and stored in compliance with applicable federal, State, and local regulations. These regulations include the Hazardous Material Transportation Act, the RCRA, the California HWCA, CUPA, and the CalARP. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. The quantity of potential hazardous substances used during construction is very limited and does not require special permitting.

As the use and transport of regulated materials would be limited, in terms of volume and duration, these materials are not considered a significant hazard to the public or environment.

Furthermore, any unexpected spills or leakages (for example, fuel from a vehicle) that occur during construction would be required to be remediated in accordance with the State and local regulations for hazardous waste cleanup. Specifically, the construction site would be subject to the regulations in Title 8 of the California Code of Regulations (T8 CCR) that governs workplace safety, and which address the handling of hazardous materials in a workplace environment. Any contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Adherence to all emergency response plan requirements set forth by the Oxnard Fire Department (OFD) would be required through the duration of the proposed Project construction phase.

As discussed above, the RECs for the Project Site are associated with its location within the Oxnard Oil Field, historical agricultural use, and the presence of ASTs and USTs. Soil, groundwater, and soil gas samples were collected and analyzed throughout the site. The Evaluation of Risk Potential report found no significant impacts from soil vapor or groundwater. While OCPs related to past agricultural use were detected at levels exceeding screening thresholds, the risk characterization concluded that these levels fall within or just slightly above the lower end of the U.S. EPA acceptable risk range for residential exposure ($1x10^{-6}$ to $1x10^{-4}$) and are not expected to pose a health concern.

For these reasons, compliance with applicable federal, State, and local regulations, potential impacts related to the transport, use, or disposal of hazardous materials during construction of the Project would be less than significant.

Operational Impacts

The proposed Sub-Neighborhood Plan would allow the development of residential, commercial, and open space land uses that would involve the storage or use of commonly found hazards associated with these land uses. Standard household chemicals such as surface and floor cleaning products utilized for routine janitorial cleaning procedures and pesticides for parks/open space areas would be used and stored in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including, but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Any associated risk would be adequately reduced to a less than significant level through implementation and compliance with these existing laws and regulations. Operational impacts through the routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation measure is required.

b. Would the project create a substantial hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact.

Construction activities typically involve the demolition of existing site improvements, earthmoving activities associated with excavation and grading for subsurface levels, and the transport and disposal of these materials and soil. Such activities have the potential to result in the release of hazardous materials into the environment, should these demolished site improvements and soil contain hazardous materials. An accidental spill of common construction materials, such as fuels, paints, cleaners, solvents, or welding materials may impact the environment.

The Evaluation of Risk Potential report found no significant impacts from soil, soil vapor, or groundwater related to existing contamination of soil or groundwater. For these reasons, no further environmental investigations are needed, and the Project Site would not present a significant

environmental risk to construction workers or future occupants from hazardous materials through upset or accident conditions.

Through compliance with applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials as well as adherence to manufacturer's instructions for the safe handling and disposal of hazardous materials, a release of hazardous materials into the environment during operation of the proposed Project would be minimized. Therefore, impacts with regard to the release of hazardous materials to the environment through reasonably foreseeable upset or accident conditions would be less than significant. No mitigation measures are required.

c. Would the project emit hazardous substances or handle hazardous or acutely hazardous substances or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact.

Del Sol High School is within the Project Site and Rio Rosales Elementary School and Norman R. Brekke Elementary School are within one-quarter mile of the Project Site. As discussed above, the Evaluation of Risk Potential determined that there are no significant hazards or hazardous materials associated with the existing contamination of soil or groundwater. The proposed Sub-Neighborhood Plan would allow development of residential, commercial and open space land uses that would comply with applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials as well as adherence to manufacturer's instructions for the safe handling and disposal of hazardous materials, a release of hazardous materials into the environment would be avoided. Therefore, impacts regarding the release of hazardous materials to schools within one-quarter of a mile would be less than significant. No mitigation measures are required.

f. Would the project impair implementation of or physically interfere with an adopted emergency operations plan or Ventura County Operation Area Response Protocol or City of Oxnard emergency evacuation protocols?

Less than Significant Impact.

The City's Emergency Operations Plan (EOP) serves as a comprehensive guide for responding to, managing, and recovering from potential emergencies and disasters within the City. It fulfills the requirements of the Standardized Emergency Management System (SEMS), as outlined in Title 19 of the California Code of Regulations, and aligns with the National Incident Management System (NIMS). The EOP incorporates information from several key sources, including the FEMA Comprehensive Preparedness Guide, Local Government Emergency Planning Guidance, Ventura County Multi-Jurisdictional Hazard Mitigation Plan, SEMS Guidelines, California Emergency Planning

Guidance for Local Government and Crosswalk, and the City's General Plan.[10] The Project Site is not located along a designated evacuation route; the nearest such route is Gonzales Road, approximately 0.4 mile to the north.[11]

Construction

As detailed in the Maulhardt-Stiles Sub-Neighborhood Plan Traffic Analysis report developed for the Project (**Appendix C**), short-term adverse traffic and parking impacts could occur in the vicinity of the Project during construction. Additional trips generated by truck deliveries and construction employees could affect traffic flow in the Project area. Construction activity could also affect traffic along Rose Avenue, Camino Del Sol, and Jacinto Drive. Pedestrian traffic flow near the Project Site could also be altered as a result of construction. The availability of parking, especially on-street parking in the study area, could be impacted if on-site parking for construction employees were not provided. However, the Project will be required to comply with the City's standard development permit conditions relating to construction activities, including the preparation and implementation of a Construction Mitigation Plan (CMP). The CMP would ensure that all construction activities would not significantly impact vehicular or pedestrian traffic during construction.

Development of the proposed Sub-Neighborhood Plan would comply with applicable City regulations, such as the City's Fire Code, requiring the provision of adequate emergency access during construction. Prior to the issuance of building permits, the City would review the site plans for individual development projects within the Sub-Neighborhood Plan Area, including location of all buildings, fences, driveways, and other features that may affect emergency access. The site design for the proposed Project includes access and fire lanes that would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All onsite access and sight-distance requirements would be in accordance with City design requirements. The City's review process and compliance with applicable regulations and standards would ensure that adequate emergency access would be provided at the Project Site, resulting in less than significant impacts to emergency access during construction.

Operation

As detailed in **Section 4.16: Transportation**, the proposed Sub-Neighborhood Plan would not significantly impact local traffic levels of service (LOS) compared to cumulative baseline levels. Additionally, the proposed circulation of the Project would not alter the existing roads that surround the Project Site. Therefore, the proposed Project would not impair or impede implementation of the City's emergency operations plan, resulting in less than significant impacts.

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10 City of Oxnard Office of Emergency Services. *Emergency Operation Plan*. 2021. Accessed August 2024. https://www.oxnard.gov/wp-content/uploads/EOP-2021-TOC-510.pdf.

11 City of Oxnard Fire Department. *Simple Steps to Disaster Preparedness*. 2019. Accessed August 2024. https://www.oxnard.gov/wp-content/uploads/Disaster-Preparedness-English.pdf.

4.9.6 Cumulative Impacts

The City's General Plan EIR concluded projected population and employment growth would lead to increased use of hazardous household, commercial, and industrial materials. However, City, regional, State, and federal regulations would apply to all development in the City, thereby reducing the potential for cumulative impacts associated with hazards and hazardous materials to a less than significant level.

As noted in **Section 3.0: Environmental Setting**, of this Draft EIR, several related projects are located near the Project Site. Each related project would undergo its own evaluation for potential public safety risks, including those associated with the use, storage, and disposal of hazardous materials. These projects would also be required to comply with the same set of federal, State, and local regulations, further ensuring that cumulative impacts remain less than significant.

The Evaluation of Risk Potential report did not identify any significantly elevated levels of recognized environmental conditions (RECs), and no further remedial action is required. Additionally, development associated with the proposed Sub-Neighborhood Plan would adhere to applicable regulations related to the transportation, storage, use and disposal hazards. Therefore, the Project would not contribute to any significant cumulative impacts.

4.9.7 Level of Significance Without Mitigation

Impacts would be less than significant without mitigation.

4.9.8 Mitigation Measures

No mitigation measures are required.

4.9.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

4.10 HYDROLOGY AND WATER QUALITY

This section evaluates the potential for the proposed Project to affect hydrology and water quality conditions in the Project area. This section incorporates information from the Preliminary Hydrology Report prepared for the proposed Project by Jensen Design and Survey, Inc. (**Appendix N**) that analyzes the current hydrology conditions of the Project Site and compares it to the conditions with Project buildout.

4.10.1 Existing Conditions

Existing Drainage Patterns

As described in the Hydrology Report, the entire Project Site drains towards Camino del Sol on the south edge of the site. Runoff from Area A drains to temporary desilting basins located along Camino Del Sol before it connects to the public storm drain system. Area C also drains to Camino del Sol through small farm ditches and several inlets. Two reinforced concrete box (RCB) main drains in Camino del Sol convey stormwater to the Rice Road Drain and eventually to the Pacific Ocean.[1] The drainage system serving Area B was previously evaluated in the New High School No. 8 Draft EIR, which concluded that post-development stormwater would be routed via inlets, curbing, and piping to on-site pretreatment and detention facilities before discharging at the rate of 1 cubic foot per second per acre (cfs/ac) to the Rice Road Drain along Camino Del Sol, consistent with the 1987 Rice Road Watershed Agreement.[2]

The Ventura County Watershed Protection District (VCWPD) and the City of Oxnard, through the 1987 Rice Road Watershed Agreement, established a maximum allowable discharge rate of one cfs/ac for properties within the Rice Road Drain watershed, including the Project Site.[3]

Groundwater

The City extracts groundwater from the Oxnard Plain Groundwater Basin (Oxnard Basin) using City wells and under the terms of an agreement with the United Water Conservation District. The City has a total groundwater allocation of approximately 17,000 acre-feet per year (afy) from all sources. In the period from 2016 to 2020, the City extracted an average of 7,250 afy from the Oxnard subbasin. The City owns and operates ten (10) wells that pump groundwater from the Oxnard Basin. The City's

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1 Jensen Design & Survey, Inc. *Preliminary Hydrology Report*. p. 4. January 2024. See **Appendix N**.

2 Tetra Tech. *Draft Environmental Impact Report New High School No. 8*. 2019.

3 Jensen Design & Survey, Inc. *Preliminary Hydrology Report*. See **Appendix N**.

groundwater is blended with its purchased and imported water at blending stations. The City operates six (6) blending stations throughout the City.[4]

The Project Site contains an existing water well, identified as State Well Number (SWN) 02N22W35K03S, CombCode MAUL in Area A at the southwest corner of the intersection of Cesar Chavez Drive and Gibraltar Street. In February 2021, the Fox Canyon Groundwater Management Agency (FCGMA) defined an initial allocation of 196.5 afy of groundwater for this well. FCGMA approved the transfer of 51.3 afy of water from this well to the City, which included 42.3 afy of water for Del Sol High School in Area B and an additional 9.0 afy for the remaining southwest farm parcel in Area C. A total of 154.2 afy of water allocations are available for the Project, consisting of the 9 afy for the Area C and 145.2 afy for the Area A.[5]

Flood Hazard Zones

The Federal Emergency Management Agency (FEMA) provides flood hazard information and is responsible for mapping areas subject to flooding through the Flood Insurance Rate Map (FIRM) program. As shown in **Figure 4.10-1: FEMA Flood Map**, the western portion of the Project Site is located within Zone X, meaning it is outside of the 100-year (1% annual chance) flood hazard zone and is an area with minimal flood hazards. The eastern portion of the Project Site is located within an area of shaded Zone X, meaning it is in a 500-year (0.2% annual chance) flood hazard zone with average depths of less than one foot or with drainage areas less than one square mile.[6]

The Project Site is located in a portion of the City that is not near the ocean or a large body of water. Therefore, the Project Site is not within a tsunami hazard area or seiche zone.[7]

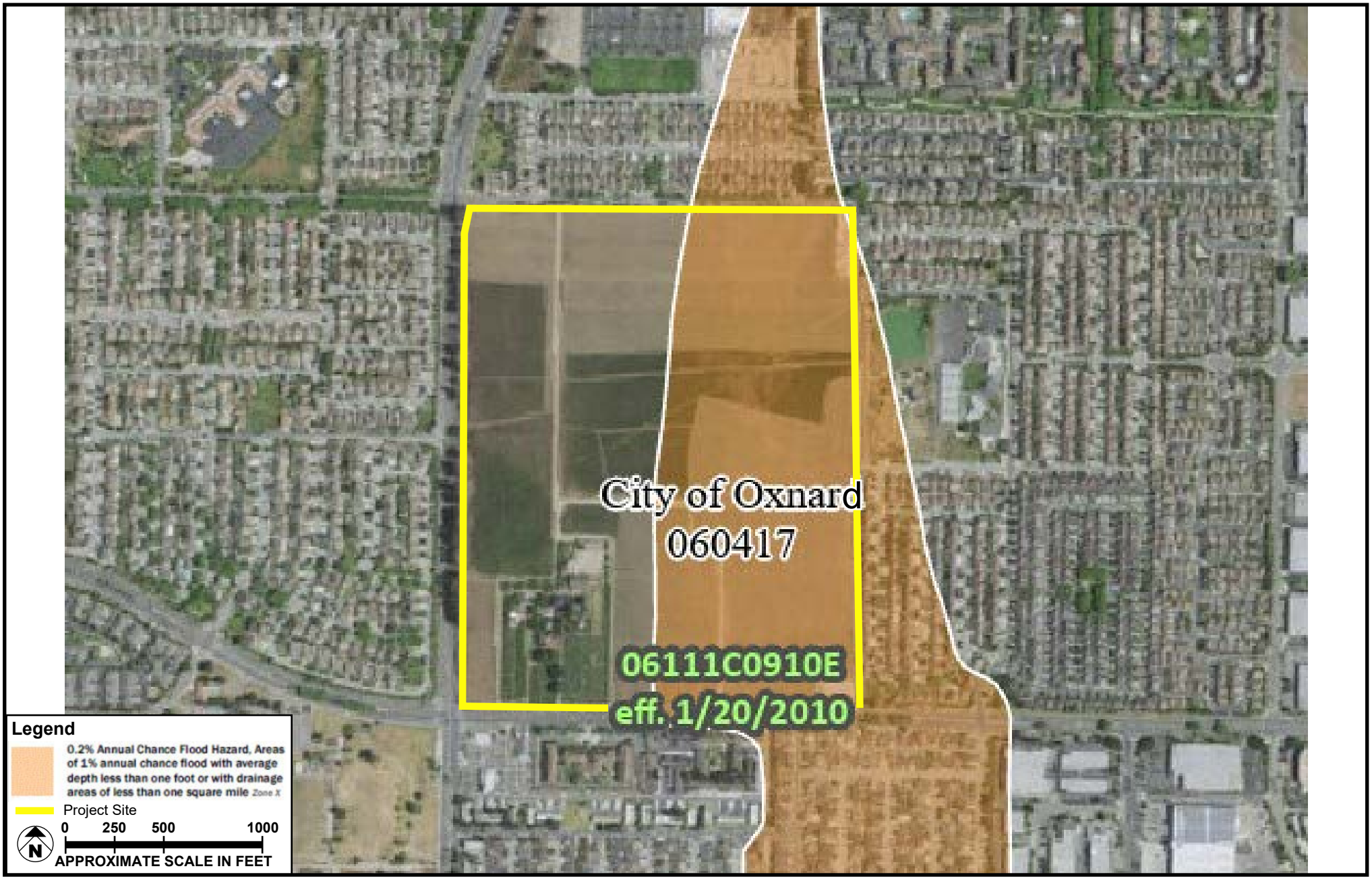
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4 City of Oxnard. *Urban Water Management Plan*. "Water Supply Characterization." p. 6-6. Accessed May 2025 . https://www.oxnard.gov/public-works/water/water-quality-reports.

5 Jensen Design & Survey, Inc. "Maulhardt Stiles/NECSP Sub-Neighborhood Plan Water Allocation and Demand Memorandum." Accessed January 2025.

6 Federal Emergency Management Agency. "FEMA Flood Map Service Center." Accessed November 2024. https://msc.fema.gov/portal/home.

7 California Geological Survey. "Tsunami Hazard Area Map." Accessed December 2024. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles.



SOURCE: FEMA – 2010

FIGURE **4.10-1**

Meridian Consultants

FEMA Flood Map

408-001-24

4.10.2 Regulatory Framework

Federal

Clean Water Act (CWA)

The CWA was enacted to restore and maintain the chemical, physical, and biological integrity of the Nation's waters by regulating the discharge of pollutants to the waters of the US from point sources for the propagation of fish and wildlife. Section 208 of the CWA and the requirements of the Code of Federal Regulations require local water management plans. Preparation of these water management plans is delegated to individual states by the United States Environmental Protection Agency (USEPA), which is charged with implementing the CWA.

Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into waters of the United States regulated under this program which include fill for development and mining projects. Waters of the United States are defined in US Army Corps of Engineers (USACE) regulations stating that navigable waters are those that are navigable in the traditional sense and includes adjacent wetlands and tributaries to navigable waters of the US and other waters, the degradation or destruction of which could affect interstate or foreign commerce.[8] Proposed activities are regulated through a permit process, reviewed by the USACE, who evaluates applications under a public interest review, as well as the environmental criteria set forth in the CWA Section 404(b)(1) Guidelines, regulations promulgated by the USEPA.

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. The water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA.

Section 303(d) of the 1972 Federal CWA requires States to identify water bodies that do not meet water quality objectives and are not supporting their beneficial uses. Each State must submit an updated list, called a 303(d) list, to the USEPA every two years. In addition to identifying the water bodies that are not supporting beneficial uses, the list also identifies the pollutant or stressor causing impairment and establishes a priority for developing a control plan to address the impairment. The list identifies State water bodies where 1) a Total Maximum Daily Load (TMDL) has been approved by the USEPA, but water quality standards are not yet met, and 2) water bodies where the water quality impairment is being addressed by an action other than a TMDL and water quality standards are not yet met.

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) are responsible for monitoring, assessing, and reporting under CWA Sections 303(d) and

8 *Sackett v. EPA*, 598 U.S. 651 (2023).

305(b), and TMDL development for the State of California. The State Board and Regional Boards cooperate in developing Section 305(b) and Section 303(d) listing reports. TMDLs are normally developed by the RWQCBs, and then approved by the SWRCB and State Office of Administrative Law before being submitted for USEPA approval.

National Pollutant Discharge Elimination System (NPDES)

In 1972, the NPDES was established under Section 402 of the CWA to control the discharge of pollutants to waters of the US. It does so by establishing a variety of measures designed to reduce pollutant discharges through a permitting program. NPDES permits contain limits on allowable discharge, monitoring and reporting requirements, and other provisions to ensure that the discharge does not pollute water quality or is detrimental to public health. The USEPA NPDES Program requires NPDES permits for: (1) Municipal Separate Storm Sewer Systems (MS4) Permit generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extended the requirements for NPDES permits to numerous small municipal separate storm sewer systems, construction sites of one to five acres, and industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from permitting. Under the CWA, the NPDES program is managed nationally by the USEPA, who authorizes the NPDES permit program to State, tribal, and territorial governments, enabling them to perform many of the permitting, administrative, and enforcement aspects of the NPDES program.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) is the main federal law that ensures the quality of the Nation's drinking water.[9] The SDWA was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply and its sources, including rivers, lakes, reservoirs, springs, and groundwater wells. Under SDWA, the USEPA sets standards for drinking water quality and oversees the states, localities, and water suppliers that implement those standards. The SDWA regulates contaminants of concern in domestic water supply, including the maximum contaminant levels (MCLs), and stipulates that the USEPA has delegated the California Department of Public Health the responsible agency for administering California's drinking water program. MCLs are established under California Code of Regulations (CCR) Title 22, Div. 4, Ch. 15, Article 4 (Title 22 Standards).

9 United States Code. Title 42. The Public Health and Welfare. Chapter 6A. Public Health and Service. Safe Drinking Water Act. 2006 Edition, Supplement 4.

National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate the FEMA to evaluate flood hazards.[10] FEMA provides flood insurance rate maps (FIRMs) for local and regional planners to promote sound land use and development practices, by identifying potential flood areas based on the current conditions. To delineate a FIRM, FEMA conducts engineering studies referred to as flood insurance studies (FIS). Using information gathered in these studies, FEMA engineers and cartographers delineate special flood hazard areas (SFHA) on FIRMs.

The Flood Disaster Protection Act requires owners of all structures within identified SFHAs to purchase and maintain flood insurance as a condition of receiving federal or federally-related financial assistance, such as mortgage loans from federally-insured lending institutions. Community members within designated areas are able to participate in the National Flood Insurance Program (NFIP) afforded by FEMA.

State

California Water Code

The California Water Code includes 22 kinds of districts or local agencies with specific statutory provisions to manage surface water. Many of these agencies have statutory authority to exercise some forms of groundwater management. For example, a Water Replenishment District (Water Code Section 60000 et seq.) is authorized to establish groundwater replenishment programs and collect fees for that service, and a Water Conservation District (Water Code Section 75500 et seq.) can levy groundwater extraction fees. Through special acts of the Legislature, 13 local agencies have been granted greater authority to manage groundwater. Most of these agencies, formed since 1980, have the authority to limit exports and control some in-basin extraction upon evidence of overdraft or the threat of an overdraft condition. These agencies can also generally levy fees for groundwater management activities and for water supply replenishment.

Porter-Cologne Water Quality Control Act

Under the Porter-Cologne Water Quality Control Act (Water Code Sections 13000 et seq.), the SWRCB has authority over State water rights and water quality policy. This Act divided the State into nine regional basins, each under the jurisdiction of a RWQCB, to oversee water quality on a day-to-day basis at the local and regional level. RWQCBs engage in a number of water quality functions in their respective regions. RWQCBs regulate all pollutant or nuisance discharges that may affect either surface water or groundwater. Each RWQCB is required to formulate and adopt a Water Quality Control Plan or Basin Plan for its region. The Basin Plan establishes beneficial use definitions for the various types of water bodies and serves as the basis for establishing water quality objectives,

10 United States Code. Title 42. National Flood Insurance Act of 1968, as amended, and Flood Disaster Protection Act of 1973. Section 4001 et seq.

discharge conditions, and prohibitions, and must adhere to the policies set forth in the CWC and established by the SWRCB.

State Water Resources Control Board General Construction Permit

The SWRCB has adopted a Statewide Construction General Permit (Order No. 2022-0057-DWQ) for stormwater discharges associated with construction activity. These regulations prohibit the discharge of stormwater from construction projects that include one acre or more of soil disturbance. Construction activities subject to this permit include clearing, grading, and other disturbance to the ground, such as stockpiling or excavation, that results in soil disturbance of at least one acre of total land area. Individual developers are required to submit Permit Registration Documents (PRDs) to the SWRCB for coverage under this general permit prior to the start of construction. The PRDs include a Notice of Intent (NOI), risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website. This general Construction General Permit requires all dischargers to (1) develop and implement a SWPPP, which specifies best management practices (BMPs) to be used during construction of the project; (2) eliminate or reduce non-stormwater discharge to stormwater conveyance systems; and (3) develop and implement a monitoring program of all specified BMPs. The two major objectives of the SWPPP are to (1) help identify the sources of sediment and other pollutants that affect the water quality of stormwater discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges.

State Water Resources Control Board Trash Amendments

On April 7, 2015, the State Water Board adopted an Amendment to the Water Quality Control Plan for Ocean Waters of California (Ocean Plan) to Control Trash and Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (ISWEBE Plan). Together, they are collectively referred to as "the Trash Amendments." The purpose of the Trash Amendments is to reduce trash entering waterways Statewide, provide consistency in the SWRCB's regulatory approach to protect aquatic life and public health beneficial uses, and reduce environmental issues associated with trash in State waters. There are two compliance tracks:

- **Track 1:** Permittees install, operate, and maintain a network of certified Full Capture Systems (FCS) to capture trash in storm drains, located in priority land use areas for municipal systems, and the entire facility for industrial and commercial permit holders.
- **Track 2:** Permittees install, operate, and maintain any combination of controls (structural and/or institutional) anywhere in their jurisdiction as long as they demonstrate that their system performs as well as Track 1.

The Trash Amendments provide a framework for permittees to implement its provisions. Full compliance must occur within 10 years of the permit and permittees must also meet interim milestones such as average load reductions of 10% per year.

State Water Resources Control Board Groundwater Ambient Monitoring and Assessment

In 2000, the SWRCB created the Groundwater Ambient Monitoring and Assessment (GAMA) Program as California's comprehensive groundwater quality monitoring program. It was later expanded by AB 599, the Groundwater Quality Monitoring Act of 2001, in order to improve Statewide comprehensive groundwater monitoring and increase the availability to groundwater quality information to the public. AB 599 required the SWRCB to establish a comprehensive monitoring program capable of assessing each groundwater basin in the State through direct and other statistically reliable sampling approaches, and to create an interagency task force to identify actions necessary to establish the monitoring program and to identify measures that would increase coordination among State and federal agencies that collect groundwater contamination information.

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the State (e.g., includes isolated wetlands and groundwater), not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality must be maintained, and discharges to that water body must not unreasonably affect present or anticipated beneficial uses of such water resources.

CALGreen

Formerly known as the California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations, CALGreen is designed to improve public health, safety, and general welfare by utilizing design and construction methods that reduce the negative environmental impact of development and to encourage sustainable construction practices. CALGreen provides mandatory direction to developers of all new construction and renovations of residential and non-residential structures with regard to all aspects of design and construction, including, but not limited to, site drainage design, stormwater management, and water use efficiency. Required measures are accompanied by a set of voluntary standards designed to encourage developers and cities to aim for a higher standard of development.

California Toxics Rule

USEPA has established water quality criteria for certain toxic substances via the California Toxics Rule. The California Toxics Rule established acute (i.e., short-term) and chronic (i.e., long-term)

standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by each RWQCB as having beneficial uses protective of aquatic life or human health.

Assembly Bill 3030

In 1992, Assembly Bill 3030 was passed, which increased the number of local agencies authorized to develop a groundwater management plan and set forth a common framework for management by local agencies throughout California. These agencies could possess the same authority as a water replenishment district to "fix and collect fees and assessments for groundwater management" (Water Code Section 10754), provided they receive a majority of votes in favor of the proposal in a local election (Water Code Section 10754.3).

Sustainable Groundwater Management Act (SGMA)

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package—AB 1739, Senate Bill 1168, and SB 1319—collectively known as the SGMA. This Act requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically over-drafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline. Through the SGMA, the CDWR provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt GSPs for crucial groundwater basins in California.

Urban Water Management Plans

Pursuant to the California Urban Water Management Act (California Water Code Sections 10610–10656), urban water purveyors are required to prepare and update an Urban Water Management Plan (UWMP) every 5 years. UWMPs are prepared by California's urban water suppliers to support long-term resource planning and ensure adequate water supplies. Every urban water supplier that either delivers more than 3,000 acre-feet per year of water annually or serves more than 3,000 connections are required to assess the reliability of its water sources over a 20-year period under normal-year, dry-year, and multiple-dry-year scenarios in a UWMP. UWMPs must be updated and submitted to the California Department of Water Resources every 5 years for review and approval. The Project Site is covered by 2020 City of Oxnard Urban Water Management Plan (2020 UWMP).

Senate Bill 610 and Senate Bill 221

SB 610 and SB 221, amended into State law effective January 1, 2002, improve the linkage between certain land use decisions made by cities and counties and water supply availability. The statutes require detailed information regarding water availability and reliability with respect to certain developments to be included in the administrative record, to serve as the evidentiary basis for an approval action by the city or county on such projects. Under Water Code Section 10912(a), projects

subject to the CEQA that require a water supply assessment (WSA) include (1) residential development of more than 500 dwelling units; (2) shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space; (3) commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; (4) hotel, motel or both, having more than 500 rooms; (5) industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land or having more than 650,000 square feet of floor area; (6) mixed-use projects that include one or more of the projects specified; or (7) a project that would demand an amount of water equivalent to or greater than the amount required by a 500-dwelling-unit project. A fundamental source document for compliance with SB 610 is the UWMP, which can be used by the water supplier to meet the standard for SB 610. SB 221 applies to the Subdivision Map Act, conditioning a tentative map on the applicant to verify that the public water supplier has sufficient water available to serve the proposed development.

Regional

Regional Water Quality Control Board (RWQCB)

The RWQCBs serve as the frontline for State and federal water pollution control efforts. It is composed of nine control boards, each including seven members. Regional boundaries are based on watersheds and water quality requirements are based on the unique differences in climate, topography, geology, and hydrology for each watershed. Each Regional Board makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement actions.

Los Angeles Regional Water Quality Control Board

The City and Project Site are part of the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB) (Region 4). The LARWQCB has adopted a Basin Plan in accordance with criteria contained in the CWA, Porter-Cologne Act, and other pertinent State and federal rules and regulations.[11] The intent of the Basin Plan is to preserve and enhance water quality and protect the beneficial uses of all regional waters. The intended beneficial use of water determines the water quality objectives. For example, the quality requirements for irrigation water are different from drinking water.

The LARWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements for appropriate persons and groups; these can include individuals, communities, or businesses whose waste discharges may affect water quality. These requirements can be either State Waste Discharge Requirements for discharge to land, or federally delegated NPDES permits for discharges

11 Los Angeles Regional Water Quality Control Board. *Water Quality Control Plan for the Los Angeles Region (Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties)*. Accessed November 2024. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html.

to surface water. Discharges are required to meet water quality objectives and, thus, protect beneficial uses.

County of Ventura

The County of Ventura (County) is subject to the Waste Discharge Requirements for Storm Water and Non-Storm Water Discharges from the Municipal Separate Storm Sewer Systems (MS4s) within the Ventura County Watershed Protection District (VCWPD), County, and incorporated cities, issued as Order No. R4-2010-0108, NPDES Permit No. CAS004002 (MS4 Permit).[12]

The VCWPD is the principal permittee, and the City of Oxnard along with County and all other cities within the County are co-permittees. Part 4, Section E of the MS4 Permit includes Planning and Land Development requirements. The Planning and Land Development Program aims to minimize runoff pollution typically caused by land development and protect the beneficial uses of receiving waters. As such, the MS4 Permit requires new development and redevelopment to control pollutants, pollutant loads, and runoff volume emanating from impervious surfaces by limiting the effective impervious area to 5% or less of the project area. New development and redevelopment must also be able to accommodate water from a 0.75-inch storm event with no water leaving the site through postconstruction control measures.

The County developed the Ventura County Technical Guidance Manual for Stormwater Control Measures (TGM), which provides guidance on the use of stormwater management control measures for new development and redevelopment projects in the County of Ventura and the incorporated cities therein. The TGM includes guidance for mitigating potential water quality impacts from new development and redevelopment projects.[13] The Ventura County Hydrology Manual and the design calculator contains further details on design criteria.[14]

Local

City of Oxnard

Oxnard Municipal Code (OMC) Chapter 22, Article XII relates to stormwater quality management. Article XII implements the Clean Water Act by prohibiting non-stormwater discharges into the City's MS4. OMC Section 22-219 requires a Stormwater Pollution Control Plan (SWPCP) for new development over four lots. The SWPCP requires implementation of BMPs to effectively prohibit the entry of pollutants from the construction site into the storm drain system during construction. Further, the City's Ordinance 2876 amends OMC Chapter 22, Article XII and requires new and

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12 Los Angeles Regional Water Quality Control Board. *Water Quality Control Plan for the Los Angeles Region (Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties)*.

13 County of Ventura. *Technical Guidance Manual for Stormwater Quality Measures – New Development and Redevelopment Projects*. Accessed November 2024. http://www.vcstormwater.org/index.php/publications/manuals/tech-guide-manual.

14 Ventura County Watershed Protection District. *Ventura County Hydrology Manual*. Accessed November 2024. https://www.vcpublicworks.org/wpd/hydrologymanual/.

redevelopment projects to develop Post-Construction Storm Water Management Plans (PCSMPs). The City reviews projects' PCSMPs to ensure accordance with the TGM guidance and requires a notarized Declaration of Restrictive Covenant for Storm Water Quality Control Measures Maintenance and Access to ensure accountability for maintaining post-construction control measures and to authorize the City access for inspections and emergency issues.[15]

City of Oxnard Water Neutrality Policy

The City's Water Neutrality Policy was adopted on January 15, 2008, which ensures mitigation measures are imposed as part of approval for new development, to ensure that associated demand remains consistent with available water supplies. Project approvals include conditions that (1) control the pace of construction of a project and the pace at which water demand increases; (2) allow participation in the contribution toward the development of additional water supplies that offsets the demand associated with the project; or, (3) suspend project approval until sufficient supplies are available to support the anticipated project demand. This policy requires that all new developments approved in the City must offset its water demand with a supplemental water supply. "New development" includes all planned (anticipated in the current General Plan) and any unplanned future development occurring in the City. Under the policy, a development can be water neutral by meeting its projected demand through one or more of the following: (1) transfer of existing FCGMA groundwater allocations to the City; (2) contributing to increased efficiency by funding City water conservation programs; (3) funding recycled water retrofit projects; or, (4) providing additional water supplies.[16]

City of Oxnard, General Plan

The following goals and policies in the City of Oxnard 2030 General Plan are applicable to hydrology and water quality as it relates to the proposed Project:

GOAL CD-8 Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.

CD-8.10: ***Timing of Large-Scale Development***

Consider at an early stage the infrastructure investment needs of largescale developments in order to evaluate these needs as part of long-range water supply, conveyance, wastewater, and other relevant planning.

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15 City of Oxnard. "Declaration of Restrictive Covenant for Storm Water Quality Control Measures Maintenance and Access." Accessed November 2024. https://www.oxnard.gov/wp-content/uploads/NPDES-Declaration-of-BMP-Maintenance-2011TGM-05-2017-Version.pdf.

16 City of Oxnard. *Urban Water Management Plan*. "Water Supply Characterization." p. 6-6. Accessed May 2025. https://www.oxnard.gov/public-works/water/water-quality-reports.

GOAL ICS-1 Provision of adequate facilities and services that maintain service levels, with adequate funding.

ICS-1.1: ***Maintain Existing Service Levels***

Maintain the high priority of providing services to residents and visitors and prevent deterioration of existing service levels.

ICS-1.2: ***Development Impacts to Existing Infrastructure***

Review development proposals for their impacts on infrastructure (e.g., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.

ICS-1.4: ***Infrastructure Conditions of Approval***

New development should not be approved unless:

- *The applicant demonstrates adequate public services and facilities are available;*
- *Infrastructure improvements incorporate a range of feasible measures that can be implemented to reduce all public safety and/or environmental impacts associated with the construction, operation, or maintenance of any required improvement;*
- *Infrastructure improvements are consistent with City infrastructure master plans; and*
- *Required infrastructure needed for future new development is self-funded.*

GOAL ICS-11 Water supply, quality, distribution, and storage adequate for existing and future development.

ICS-11.5: ***Sustainability of Groundwater Supply***

Support the policies of the Fox Canyon Groundwater Management Agency to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.

ICS-11.7: ***Water Wise Landscapes***

Promote water conservation in landscaping for public

facilities and streetscapes, residential, commercial and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new and replacement landscaping.

ICS-11.9: ***Groundwater Extractions***

Continue to adhere to the recommendations of the Ventura County Regional Water Quality Planning Program regarding groundwater quality and extractions.

ICS-11.11: ***Water Quality***

Monitor water quality regularly to ensure that safe drinking water standards are met and maintained in accordance with State agencies with jurisdiction and Environmental Protection Agency (EPA) regulations, and take necessary measures to prevent contamination.

ICS-11.12: ***Water for Irrigation***

Require the use of non-potable water supplies for irrigation of landscape and agriculture, whenever available.

ICS-11.13: ***Water Neutral Policy and Urban Water Management Plans***

Incorporate the City's Water Neutral Policy regarding new development into the 2010 Urban Water Management Plan and develop appropriate ordinances, policies, and/or programs to fully implement the policy.

GOAL ICS-12 Adequate capacity at the City Waste Water Treatment Plant to accommodate existing and future development.

ICS-12.3: ***Wastewater Discharge Monitoring***

Monitor and ensure that discharges comply with approved permits.

ICS-12.4: ***Wastewater Discharge***

Treat all wastewater in compliance with approved discharge permits.

ICS-12.5: ***Sedimentation Control***

Require by conditions of approval that silt and sediment from construction be either minimized or prohibited.

GOAL ICS-13 Adequately sized storm drain systems and discharge treatment, certified levees, and implementation of appropriate National Pollutant Discharge Elimination System (NPDES) permits and regulations.

ICS-13.1: ***100-year Floodplain***

Discourage development, major infill, and structural improvements (except for flood control purposes) within the 100-year floodplain as regulated by FEMA. Recreational activities that do not conflict with habitat uses may be permitted within the floodplain.

ICS-13.2: ***Adequate Storm Drains and NPDES Discharge Treatment***

Provide storm drainage facilities with sufficient capacity to protect the public and property from the appropriate storm event and strive to meet storm water quality discharge targets set by NPDES and related regulations.

ICS-13.3: ***Stormwater Detention Basins***

Design stormwater detention basins to ensure public safety, to be either visually attractive or unobtrusive, provide temporary or permanent wildlife habitats, and recreational uses where feasible in light of safety concerns.

ICS-13.4: ***Low Impact Development***

Incorporate low impact development (LID) alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education.

GOAL ER-5 Well managed water supply and wastewater treatment programs that together meet expected demand, prevent groundwater overdraft, and ensure water quality.

ER-5.1: ***Wastewater Treatment***

Treat all wastewater in compliance with approved discharge permits.

ER-5.2: ***208 Wastewater Control Plan***

Support updating the "208" Wastewater Control Plan to control urban and nonurban runoff.

ER-5.3: ***Reducing Dependence on Groundwater***

The City shall maintain a minimal dependence on Basin 4A groundwater consistent with the Groundwater Resource Encroachment and Treatment (GREAT) Program and support the policies of the Fox Canyon Groundwater Management Agency to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.

ER-5.4: ***Wastewater Monitoring***

Monitor all wastewater discharges on a periodic basis to ensure that discharges comply with approved permits.

ER-5.6: ***208 Groundwater Plan***

Adhere to the recommendations of the 208 Plan regarding groundwater extractions.

ER-5.7: ***Minimizing Paved Surfaces***

Require minimization and/or permeability of paved surfaces in new developments and replacement paving, where feasible.

GOAL SH-1 Minimal damage to structures, property, and infrastructure as a result of liquefaction and subsidence.

SH-1.2: ***Minimize Subsidence Trends***

Avoid increases in the level of groundwater extraction as a method for meeting new water demands if the extraction leads to subsidence, or unless a comprehensive reinjection program is approved and implemented to offset extractions.

GOAL SH-3 New development required to take necessary precautions prior to any construction to mitigate hazards and protect the health and safety of the inhabitants.

SH-3.1: ***Location of New Development***

Encourage new development to avoid areas with high geologic, tsunami, flood, beach erosion, and fire or airport hazard potential.

SH-3.2: ***New Development Flood Mitigation***

As a condition of approval, continue to require new development to mitigate flooding problems identified by the

National Flood Insurance Program and/or other expert information.

SH-3.4: ***Avoiding Blockage of Natural Drainage***

Continue to review development proposals to ensure that the capacity or ability of natural drainage is not impacted.

4.10.3 Significance Thresholds

a) Would the project cause a violation of any adopted water quality standards or waste discharge or treatment requirements?

b) Would the project substantially deplete groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would:

- ***i) Result in substantial erosion or siltation on- or off-site?***
- ***ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?***
- ***iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***
- ***iv) Impede or redirect flood flows?***

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

e) Would the project conflict with or obstruct implementation of the water quality basin plan for Oxnard in the "Los Angeles region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties", National Pollutant Discharge Elimination System (NPDES) permits and associated local standards, or the Fox Canyon Groundwater Management Agency Groundwater Sustainability Plan (FCGMA GSP) for sustainable groundwater management?

4.10.4 Methodology

The hydrology and water quality analysis is based in part on the Preliminary Hydrology Report (**Appendix N**), prepared by Jensen Design and Survey, Inc. for the proposed Project. This report identifies existing hydrologic conditions and evaluates potential impacts in accordance with applicable regulations.

4.10.5 Project Impacts

a) Would the project cause a violation of any adopted water quality standards or waste discharge or treatment requirements?

Less than Significant Impact.

Construction

Project construction activities would involve ground disturbance, which could potentially cause a violation of water quality standards, and discharge and treatment requirements. Because the Project would involve construction on more than one acre of ground, compliance with the NPDES Construction General Permit (CGP) is required. Accordingly, a SWPPP will be prepared and implemented that identifies BMPs to be used during construction of the Project to ensure pollutant loads and runoff from the Project Site are minimized for downstream receiving waters. With compliance with existing regulatory requirements, impacts to water quality and waste discharge requirements during construction would be less than significant.

Operation

Operation of the proposed Project will generate stormwater runoff and introduce sources of potential water pollution common to residential, commercial, and open space areas, including nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, trash, and debris. Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains. Compliance with the MS4 Permit requires that site design and post-construction stormwater BMPs be implemented to reduce pollutant discharges, including measures to detain and infiltrate runoff, remove sediments and debris, and improve water quality. With implementation of these requirements, impacts to water quality during operation would be less than significant.

As detailed above, VCWPD has an agreement with the City that the Project Site can discharge one cfs/ac to the Rice Road Drain. As detailed in the Preliminary Hydrology Report, development of the proposed Project would include storm drain improvements such as catch and detention basins, bio-infiltration areas, and infiltration systems. These features are incorporated as part of the Project's design to comply with the MS4 Permit requirements for post-construction stormwater management, ensuring that runoff is filtered to remove debris and contaminants, detained in high runoff situations, and infiltrated where feasible to replenish the groundwater basin in areas of permeable soil.[17]

As detailed in the Hydrology Report, the MS4 project design features would ensure that runoff from Areas A and C of the Project Site totals 49.9 cfs for 56.3 acres, consistent with the 1 cfs/ac discharge limit established under the Rice Road Watershed Agreement. Area B was calculated to have a discharge of 47.4 cfs for 50.7 acres, also consistent with the 1 cfs/ac standard. When combined, stormwater discharges from the entire Project Site equal approximately 97.3 cfs over 107 acres, demonstrating that the Project Site complies with the 1 cfs/ac maximum allowable discharge rate established by the Rice Road Watershed Agreement. Therefore, the proposed Project would result in less than significant impacts regarding stormwater discharge.

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17 Jensen Design & Survey, Inc. *Preliminary Hydrology Report*.

b) Would the project substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

Less than Significant Impact.

Development of the proposed Project would increase impermeable surfaces compared to existing conditions, which could potentially impact groundwater infiltration. As detailed in the Hydrology Report, borings were conducted at the Project Site to determine the potential for infiltration based on soil and groundwater conditions. It was determined that portions of the Project Site have good infiltration rates and other portions of the Project Site have poor infiltration rates. The Project would include the construction of detention basins and infiltration systems designed to accommodate the Stormwater Quality Design Volume (SQDV) for the site in conformance with the MS4 permit requirements. If post-grading conditions result in lower infiltration than anticipated, alternative BMPs such as bioretention systems with underdrains or bioswales can be incorporated to ensure compliance with MS4 permit standards.

Additionally, as detailed **in Section 4.18: Utilities and Service Systems**, the Project Site was planned for development under the Urban Water Management Plan (UWMP). The City of Oxnard has adopted a water neutrality policy which requires that new development not increase the City's overall water demand beyond planned supplies. Under this policy, projects must offset their projected water use through measures such as conservation, efficiency improvements, or use of existing groundwater allocations so that overall demand on the City's system remains unchanged. The Project would not utilize all of its allocated groundwater and, with the implementation of water conservation measures consistent with City requirements, would conform to the City's water neutrality policy.

As mentioned above, the Project Site contains an existing water well, identified as SWN 02N22W35K03S, CombCode MAUL in Area A at the southwest corner of the intersection of Cesar Chavez Drive and Gibralter Street. The development allowed by the proposed Sub-Neighborhood would potentially impact access to this well. This well is jointly owned by the Maulhardt/Stiles Family and the City of Oxnard, and is subject to the terms of an agreement between the two parties dated August 7, 2002. This agreement establishes that the well may be retrofitted and integrated into the City's municipal water supply system by the City. Should the City exercise this option, an easement to the City of Oxnard for this well site will be prepared and recorded in accordance with the terms established in Section 8 of this agreement. This easement shall not exceed the minimum area required to reasonably operate the well. For this reason, this easement, if granted, would result in a small decrease in the area available for development. For these reasons, impacts to groundwater recharge and supplies would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would :

i) Result in substantial erosion or siltation on- or off-site?

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact.

As discussed above, the preparation and implementation of a SWPPP, incorporating BMPs that would reduce erosion, siltation and runoff impacts is required by the Construction General Permit issued by the Regional Water Quality Control Board. The implementation of this plan would reduce potential water quality impacts during construction to less than significant.

Additionally, the Hydrology Report determined that the proposed grading and drainage improvements would not substantially alter the existing drainage pattern and runoff volumes, which would still convey runoff from the Project Site to the Rice Road Drain and stay within the discharge limitations.

Given that the Project would implement BMPs in compliance with the MS4 permit requirements, potential impacts related to the alteration of the existing drainage pattern would not substantially increase the rate or amount of surface runoff. Impacts would be less than significant.

iv) Impede or redirect flood flows?

Less than Significant Impact.

As shown in **Figure 4.10-1: FEMA Flood Map**, the western portion of the Project Site is located within Zone X, meaning it is outside of the 100-year (1% annual chance) flood hazard zone and is an area with minimal flood hazards. The eastern portion of the Project Site is located within an area of shaded Zone X, meaning it is in a 500-year (0.2% annual chance) flood hazard zone with average depths of less than one foot or with drainage areas less than one square mile.[18] Neither Zone X nor Shaded Zone X are designated as Special Flood Hazard Areas (SFHAs). While Shaded Zone X is associated with moderate flood risk, flood insurance is not required.[19] Therefore, the Project Site is not located within a 100-year flood zone or SFHA. Additionally, the storm drainage system proposed for the

18 Federal Emergency Management Agency. "FEMA Flood Map Service Center." Accessed November 2024. https://msc.fema.gov/portal/home.

19 Federal Emergency Management Agency. "FEMA Flood Maps and Zones Explained." Accessed May 2025. https://www.fema.gov/blog/fema-flood-maps-and-zones-explained.

project would result in similar peak stormwater flows to existing conditions. For these reasons, there would be less than significant impacts regarding impeding or redirecting flood flows.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less than Significant Impact.

As described above, the Project Site is not located within a 100-year flood zone. Therefore, development of the Project would not expose people or structures to significant flood hazards. Compliance with applicable drainage standards, including implementation of a SWPPP during construction and post-construction stormwater controls required under the MS4 Permit, as well as incorporation of detention and infiltration facilities described in the Hydrology Report, would ensure that the Project does not result in flooding impacts on- or off-site.

As discussed above, the Project Site is located in a portion of the City that is not near the ocean or a large body of water. Therefore, the Project Site is not within a tsunami hazard area or seiche zone.[20]

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

Less than Significant Impact.

The City's primary source of groundwater supply is the Oxnard Basin. FCGMA is the Groundwater Sustainability Agency (GSA), as defined by the Sustainable Groundwater Management Act, which oversees management of the Oxnard Basin. FCGMA developed a Groundwater Sustainability Plan (GSP) in compliance with the 2014 Sustainable Groundwater Management Act, which allocates and limits groundwater extraction volumes in order to ensure sustainability and reliability of the Oxnard Basin in the future.[21]

As detailed in **Section 4.18: Utilities and Service Systems**, the proposed Project would use less than the amount of groundwater allocated to the Project Site. Additionally, as discussed above, the proposed Project would not result in significant water quality impacts with implementation of MS4 project design features and would be able to meet the infiltration requirements. Therefore, Project impacts related to water quality and groundwater management plans would be less than significant.

4.10.6 Cumulative Impacts

As detailed in the City's General Plan EIR, as development occurs within the City's Planning Area and surrounding watersheds, cumulative impacts to hydrology and water quality could occur due to increased impervious surfaces, pollutant loads in runoff, reduced groundwater recharge, and erosion and sedimentation during construction. However, compliance with NPDES requirements

20 California Geological Survey. "Tsunami Hazard Area Map."

21 City of Oxnard. *Urban Water Management Plan*. "Water Supply Characterization."

and implementation of City policies and measures will minimize these impacts, resulting in less than cumulatively significant contributions from the Project.

With respect to water supply, long-term demand from growth in the Planning Area and region will increase cumulative use of local groundwater and imported supplies. Regional groundwater managers and water providers (e.g., FCGMA, United Water Conservation District [UWCD], Casitas Municipal Water District [CMWD], and Metropolitan Water District of Southern California [MWD]) are expected to have sufficient long-term resources to meet anticipated demand. The City and service providers have water conservation programs, Urban Water Management Plans, and water supply assessment requirements under CEQA and the Water Code to evaluate and manage cumulative water needs. As a result, the Project's incremental contribution to cumulative water supply impacts would also be less than cumulatively significant.

Cumulative impacts related to hydrology and water quality could occur if the proposed Project generated significant amounts of runoff, erosion, siltation compared to existing conditions, which could alter the hydrology and water quality in the Project area. However, as discussed above, a MS4 project design features would reduce water quality and runoff impacts to less than significant. Additionally, the Preliminary Hydrology Report concluded that the infiltration rate would not significantly impact groundwater recharge. Therefore, the Project would not contribute to any significant cumulative impacts.

4.10.7 Level of Significance Without Mitigation

Impacts would be less than significant without mitigation.

4.10.8 Mitigation Measures

No mitigation measures are required.

4.10.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

4.11 LAND USE AND PLANNING

This section evaluates the potential for the proposed Sub-Neighborhood Plan to conflict with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating significant environmental effects. As discussed in the Initial Study (**Appendix A**), impacts associated with the following Threshold were determined to be less than significant during preliminary review of the Project: a) to physically divide an established community. Therefore, further detailed evaluation is not provided for this topic because the Project will not create significant impacts in this area.

4.11.1 Existing Conditions

Project Site

The Project Site is located within the City's Sphere of Influence and the City Urban Restriction Boundary (CURB) line, which defines the urban development boundary for the City.[1] The Ventura Local Agency Formation Commission approved annexation of the Project Site to the City of Oxnard in February 2014 and the annexation was recorded in April 2014. The Project Site was previously used for agricultural operations but has not been cultivated since 2019. The proposed Sub-Neighborhood Plan identifies the three planning areas within the Project Site (**Figure 3-1: Planning Areas Within the Project Site)** – Areas A, B, and C. Area A consists of undeveloped land previously disturbed by agricultural use; Area B includes Del Sol High School, which opened in 2023; and Area C consists of the Maulhardt family residence, barn, cottages, outbuildings, other agricultural structures and a small lemon orchard that is no longer actively cultivated.

General Plan Land Use and Zoning Designation

As shown in **Figure 3-9: General Plan Land Use Map**, the General Plan land use designations for the Project Site are Residential Low Medium (RLM), Commercial General (CG) and Park (PRK).[2] As shown in **Figure 3-10: Zoning Map**, the zoning for the Project Site include Multiple-Family Residential Planned Development (R-2-PD), General Commercial Planned Development (C-2-PD), and Community Reserve (C-R).[3]

Urban Village Overlay

The General Plan land use map designates the Project Site with an Urban Village overlay. Urban villages are identified in the City of Oxnard 2030 General Plan as locations in the City where private and public redevelopment, mixed land uses, affordable and workforce housing, and transit

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1 City of Oxnard. *2030 General Plan*. 2022. Accessed May 2025. https://www.oxnard.gov/wp-content/uploads/2023/10/Oxnard-2030-General-Plan-Amend-12.2022-SMda.pdf.

2 City of Oxnard. "City of Oxnard 2030 General Plan Map." 2023. Accessed May 2025. https://www.oxnard.gov/wp-content/uploads/2030-GENERAL-PLAN-03.2023.pdf.

3 City of Oxnard. "City of Oxnard Zoning Map." 2023. Accessed May 2025. https://www.oxnard.gov/wp-content/uploads/ZoneMap-03.2023-30x40-SD.pdf.

connectivity are intended as a key strategy for meeting Greenhouse Gas reduction targets and implementing the Southern California Association of Governments (SCAG) regional Sustainable Community Strategy (Senate Bill [SB] 375).

The General Plan designates the Project Site as one of six Urban Villages in the City, specifically East Village Phase III. The General Plan states that the 107-acre Project Site represents the last large undeveloped area within City limits and presented an opportunity to provide needed public uses and an urban village within the City's Northeast Community.

Northeast Community Specific Plan

The Northeast Community Specific Plan (NECSP) was approved in 1993 to guide the orderly development of the City's Northeast Community. The City adopted its 2030 General Plan in 2011, and the NECSP land use designations were determined to be consistent with the 2030 General Plan through adoption of the City's 2030 General Plan and accompanying EIR, which evaluated continued implementation of the NECSP under the City's updated land use framework and confirmed that the NECSP land use pattern aligns with the General Plan land use map and policies applicable to the NECSP area.[4]

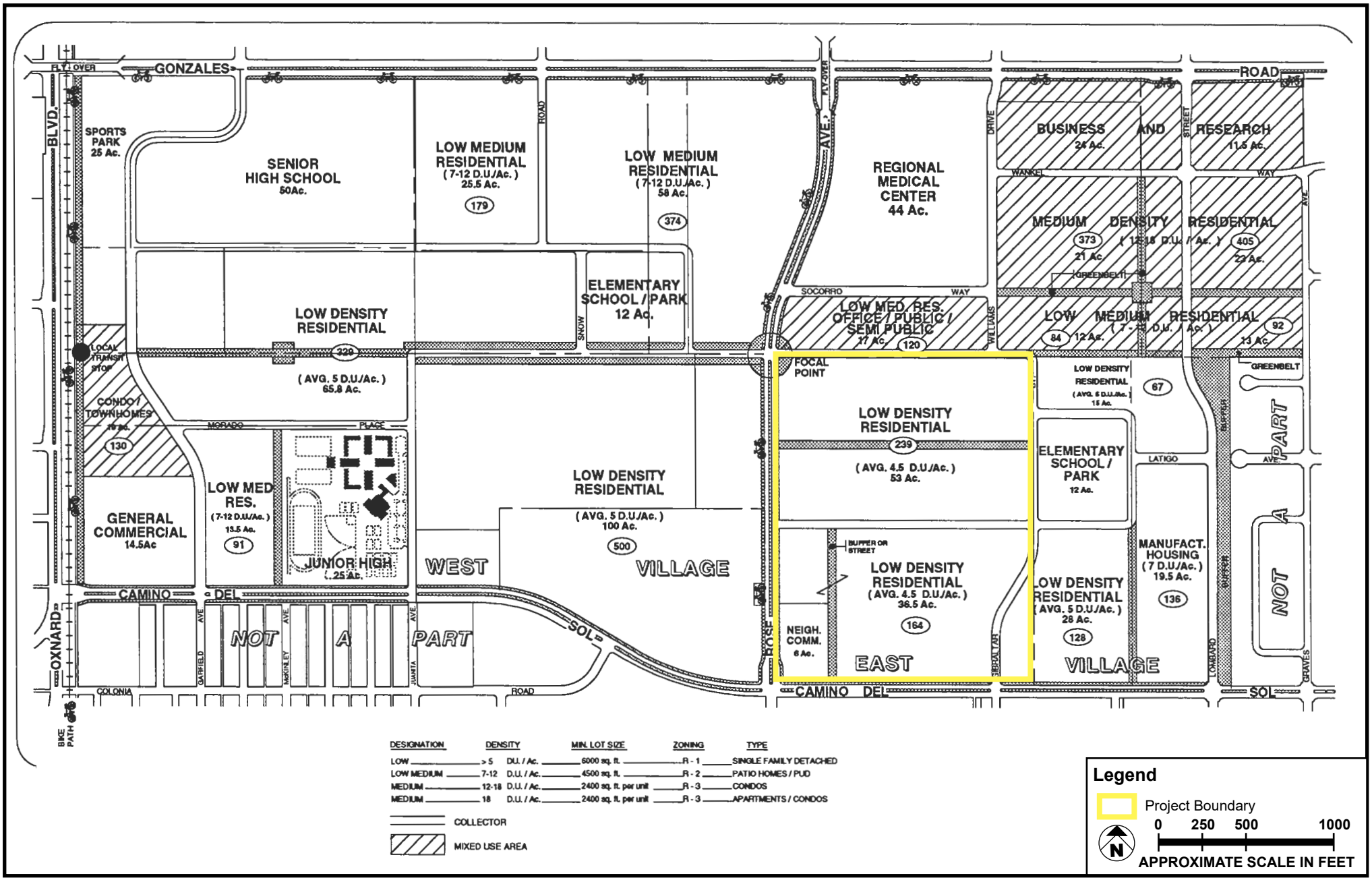
The Project Site is located within the NECSP. The NECSP allows the adoption of sub-neighborhood plans where development standards in the NECSP are allowed to be modified to create distinctive neighborhoods that meet the goals and objectives of the NECSP. The NECSP allows the development of sub-neighborhood plans for areas at least 80 acres in size providing public spaces (e.g., schools, parks, bicycle lanes, and pedestrian pathways other than sidewalks); and development that provides benefits to the City in addition to the benefits provided by the NECSP (e.g., more affordable housing projects, senior assisted housing projects, a mixture of commercial and residential uses). Sub-neighborhood plans are adopted by amendment to the NECSP.[5] As shown in **Figure 4.11-1: Northeast Community Specific Plan Land Use Plan**, the Project Site is designated as Low Density Residential (4.5 dwelling units per acre [du/ac]) and Neighborhood Commercial. As detailed below, the proposed Project would develop a sub-neighborhood plan.

Surrounding Area

The Project Site is surrounded by two-story single-family residences to the north and west; two-story single-family residences and East Village Park to the east; and a one-story fast-food restaurant, a one-story church, two- to three-story multi-family residential buildings, and two-story single-family homes to the south.

4 City of Oxnard. *2030 General Plan*. 2022.

5 City of Oxnard. *Northeast Community Specific Plan*. 1993. Accessed May 2025. https://www.oxnard.gov/wp-content/uploads/NECSP3.pdf.



SOURCE: City of Oxnard - 1993

FIGURE **4.11-1**

Meridian Consultants

Northeast Community Specific Plan Land Use Designations

408-001-24

General Plan Land Use and Zoning Designation

As shown in **Figure 3-9: General Plan Land Use Map**, the area surrounding the Project Site has General Plan land use designations of RLM to the north across Cesar Chavez Drive; Residential Low (RL) and PRK to the east across Gibraltar Street; RL, Residential Medium High (RMH) and Commercial Neighborhood (CN) to the south across Camino Del Sol; and RL to the west across North Rose Avenue.[6]

As shown in **Figure 3-10: Zoning Map**, the area surrounding the Project Site has zoning designations of R-2-PD to the north across Cesar Chavez Drive; Single-Family Residential Planned Development (R-1-PD) and C-R to the east across Gibraltar Street; R-1-PD, High-Rise Residential Planned Development (R-4-PD) and C-2-PD to the south across Camino Del Sol; and R-1-PD to the west across North Rose Avenue.[7]

4.11.2 Regulatory Framework

Federal

No federal policies or regulations pertaining to land use are applicable to the proposed Project.

State

No State policies or regulations pertaining to land use are applicable to the proposed Project.

Local

Southern California Association of Governments (SCAG)

SCAG is a joint powers authority under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues.[8] Under federal law, SCAG is designated as a metropolitan planning organization.[9] Under State law, SCAG is designated as a regional transportation planning agency and a council of governments.[10] The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura).

SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies. To

6 City of Oxnard. "City of Oxnard 2030 General Plan Map."

7 City of Oxnard. "City of Oxnard Zoning Map."

8 Southern California Association of Governments (SCAG). "About Us." Accessed October 2025. https://scag.ca.gov/about-us.

9 United States Code of Federal Regulations (CFR). Title 23, Section 450.310(a).

10 California Government Code Sections 29532(d) and 65080(a); the Public Utilities Code expressly defines that multicounty agency as Southern California Association of Governments (SCAG)(California Public Utilities Code Section 130004).

facilitate planning activities for such a large region, SCAG has divided its jurisdiction into a number of sub-regions. The Project Site is located within the Ventura Council of Governments Sub-region, which includes the Cities of Agoura Hills, Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley, Thousand Oaks, and Westlake Village, as well as the County of Ventura.

To coordinate regional transportation planning efforts and in response to Federal air and water quality laws, SCAG has prepared the Regional Comprehensive Plan/Sustainable Communities Strategies (Connect SoCal). Connect SoCal is a major advisory plan prepared by SCAG that addresses important regional issues like housing, traffic/ transportation, water, and air quality. Connect SoCal serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance.

City of Oxnard 2030 General Plan

The 2030 General Plan sets out a vision to guide future development in the City through the year 2030. The 2030 General Plan includes the seven State-required elements (land use, circulation, housing, open space, conservation, safety, and noise) within five chapters, each divided into two parts: (1) Background and (2) Goals and Objectives. The City has produced a Background Report as well as a Goals and Objectives document. The Background Report was completed in 2006 and presented a detailed description of the City and the Planning Area for a wide range of environmental resource topics. The 2021-2029 Housing Element is incorporated by reference into the 2030 General Plan document as Chapter 8.[11] The Goals and Policies document contains the actions (i.e., policies) needed to achieve the vision expressed in terms of specific goals and is intended to be used as a decision-making tool for City officials in day-to-day and long-term strategic planning and operations.

City of Oxnard Zoning Ordinance

The City of Oxnard Municipal Code establishes the laws and regulations governing land use, zoning, development standards, public health and safety, and environmental protection within the City. Its purpose is to implement the policies of the General Plan, ensure orderly growth and development, protect public welfare, and preserve natural resources. The Code includes provisions related to air quality, noise, water quality, hazardous materials, and other environmental considerations that help guide project design and implementation to ensure consistency with local regulations and sustainability goals.

Northeast Community Specific Plan (NECSP)

The NECSP Area includes approximately 856 acres, encompassing land south of Gonzales Road, east of Oxnard Boulevard, north of Camino de la Raza and its proposed extension, and an eastern

11 California Department of Housing and Community Development (HCD). *Oxnard 6th Cycle (2021–2029) Adopted Housing Element*. Accessed October 2025. https://www.hcd.ca.gov/housing-elements/docs/oxnard-6th-adopted101221.pdf.

boundary formed generally by Lombard Street and Graves Avenue. The NECSP is a guide to provide orderly growth and development of a portion of the Northeast Community through development regulations. The Specific Plan addresses land uses, circulation improvements, public service facilities and open space and recreation facilities that would be allowed to be developed within the specific plan. Additionally, the Specific Plan includes an implementation plan that describes the development phasing, responsibilities, development schedules and procedure for amending the Specific Plan.[12]

4.11.3 Significance Thresholds

b. 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 a significant environmental effect?

4.11.4 Methodology

The land use analysis evaluates whether the proposed Project is consistent with the General Plan, NECSP, zoning ordinance and whether its uses are compatible with surrounding development. The analysis considers land use characteristics such as size, intensity, density, scale, and other physical or operational factors, based on existing conditions at the time the Notice of Preparation was issued.

4.11.5 Project Impacts

b. 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 a significant environmental effect?

Less than Significant Impact.

The proposed Sub-Neighborhood Plan would allow the development of Areas A and C within the Project Site with a mix of residential, commercial, and community uses. Existing structures within Area C, including the existing residence, barn, agricultural cottages, outbuildings, and other agricultural facilities, would be demolished. The existing Del Sol High School in Area B would be retained.

The proposed Sub-Neighborhood Plan would allow for the development of up to 950 residential units and approximately 40,000 square feet of neighborhood-serving commercial space in Areas A and C. Housing types may include single-family detached homes, single-family attached units, and multi-family buildings ranging from two to four stories. 15% of the units would be designated as affordable housing, including 5% for very low-income households and 10% for low-income households.

12 City of Oxnard. *Northeast Community Specific Plan*.

Commercial buildings may be single-story or include upper-floor offices or residential flats. Parks offering both active and passive recreational opportunities would be integrated throughout the Project Site to serve residents of all ages.

The proposed Sub-Neighborhood Plan would create a walkable, multimodal community with infrastructure for pedestrians, cyclists, drivers, and transit users. Pedestrian facilities would include sidewalks, paseos, and multi-use paths; bicycle facilities would feature Class I bike lanes; vehicular circulation would be supported by new streets; and transit access would be provided by several Gold Coast Transit District (GCTD) stops along North Rose Avenue.

The following includes analysis based on the consistency of the Project with applicable local and regional laws, regulations, and plans adopted for the purpose of avoiding or mitigating an environmental effect.

General Plan

The 2030 General Plan has four major development themes/goals: 1) development within the CURB anticipated by the 2030 General Plan, 2) development or reinvestment within CURB with an "urban village" concept, 3) transition of the area south of the Oxnard Transit Center from industrial to mixed use (Downtown East Transit Oriented District), if feasibility studies support the concept, and 4) participation in the restoration of the Ormond Beach wetlands.[13] The proposed Sub-Neighborhood Plan would satisfy two major themes that are applicable, which would be to develop within the CURB and develop an urban village concept.

The General Plan land use map has an Urban Village overlay over the Project Site, which allows the Project Site to be developed with a mixture of housing types, land uses, and multiple transportation/circulation options. Urban villages are envisioned and characterized by infill and/or development of formerly agricultural land; reinvestment in the existing community; mixture of land uses; mixture of residential densities and housing types; providing a minimum of 15% affordable housing; location along or near corridors, downtown and transit nodes; transit, pedestrian, and bicycle circulation given high priority.[14]

The proposed Sub-Neighborhood Plan guides the development of a variety of land uses on the Project Site, including residential, commercial, and open space uses; provides a mix of residential types and densities; would have 15% of residential units designated for affordable housing; is located along corridors such as North Rose Avenue and transit such as GCTD; and provides pedestrian amenities such as multi-use paths, paseos, sidewalks and bicycle lanes. Therefore, the proposed Project would fit the criteria for developing an urban village because it would provide a mixture of

13 City of Oxnard. *2030 General Plan*.

14 City of Oxnard. *2030 General Plan*.

housing types (including the required 15% affordable housing units) and land uses along employment areas and transit nodes.

Table 4.11-1: Project Consistency with the City of Oxnard 2030 General Plan provides an assessment of the consistency of the Project with the City's General Plan's goals and policies. According to the consistency procedure outlined in Chapter 9 of the 2030 General Plan, the City has a three-level procedure for determining consistency. The three levels are defined by the relationship between the 2030 General Plan goal and its representative implementing policies and the proposed Project. The three levels are:

I. Direct Applicability to the proposed Project
II. Related or Indirect Applicability to the Proposed Project
III. No or Distant Applicability to the Proposed Project[15]

For Level I goals, the consistency standard is that the proposed Project furthers at least one of the goal's implementing policies and otherwise does not inhibit achievement of remaining policies. For Level II goals, the consistency standard is that the proposed Project shall not significantly inhibit achievement of the goal or its implementing policies. Level III policies are not included in **Table 4.11-1** as they are not applicable. Level I and Level II policies are included and are identified as either Level I or II in the narrative discussion.

TABLE 4.11-1: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

Chapter 3: Community Development	
Goal CD-1:	**A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.**
Policy CD-1.2 Infill Development, Priority to Mixed Use. Promote the efficient use of larger vacant parcels and vacant areas of the City by encouraging infill development, with a priority to mixed uses that reduce vehicle trips and GHG emissions and promote sustainable development goals and objectives.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would guide the development of mixed-use neighborhoods in Areas A and C designed to complement Del Sol High School in Area B and be compatible with the existing residential and other uses around this infill site. The proposed mix of uses will serve to reduce vehicle trips, thereby reducing greenhouse gas (GHG) emissions.
Policy CD-1.4 Transportation Choices. Promote the application of land use and community designs that provide residents with the opportunity for a variety of transportation choices (pedestrian, bicycle, transit, automobile).	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would provide a variety of transportation choices such as multi-use paths, paseos, and sidewalks for pedestrians; bicycle lanes for bicyclists; GCTD stops for bus transit; and roads for automobiles.
Policy CD-1.5 Housing Variety. Promote the development of a variety of housing types throughout the City including apartments, condominiums, lofts, townhouses, and attached and detached single family units.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would allow a variety of housing including single-family detached, single-family attached and multi-family attached.

15 City of Oxnard. *2030 General Plan*.

TABLE 4.11-1: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN	
Policy CD-1.6 Public Facilities. Enhance resident quality of life by providing adequate space for schools, libraries, parks and recreation areas, as well as space for the expansion of public facilities to support the community's vision	**Level I - Consistent**. As discussed in **Section 4.15: Public Services and Recreation**, the proposed Sub-Neighborhood Plan would provide adequate public facilities including new neighborhood parks, and expand the existing East Village Park.
Policy CD-1.7 Compact Development. Promote the use of development patterns that are more compactly built and use space in an efficient aesthetic manner as part of the community vision.	**Level I - Consistent**. High-density residential zones are 30 or more dwelling units per acre and medium-high zones are 18 to 30 dwelling units per acre (du/ac), as described in the City's General Plan. The proposed Sub-Neighborhood Plan would promote higher density and more compact residential development compared to the existing General Plan land use designations with a density ranging from six to 46 du/ac. Additionally, the development standards in the proposed Sub-Neighborhood Plan would guide development in an aesthetic manner that is consistent with, and compatible with, the existing development around the site. For example, the proposed Sub-Neighborhood Plan includes an edge overlay zone that would limit the height of buildings at the edges of the site adjacent to the nearby residences to create a consistent and compatible pattern of development. Additionally, as detailed in **Section 4.1: Aesthetics and Urban Design**, the proposed Sub-Neighborhood Plan would have design guidelines that would ensure that the design of the structures, landscaping and roadways would be similar to the surrounding area.
Policy CD-1.8 Natural Resource Conservation. Promote a high quality of life within the community, incorporating the retention of natural open space areas, greenbelts, and the provision of adequate recreational facilities.	**Level I - Consistent**. The Project Site does not include any natural open space areas, is not located in any of the City's agricultural greenbelt areas and, as discussed in **Section 4.15: Public Services and Recreation**, the proposed Sub-Neighborhood Plan would provide 11.3 acres of open space and recreational areas for the estimated 2,064 residents of the Project, resulting in a service ratio of 5.46 acres of land per 1,000 residents. Therefore, the Project would have adequate recreational facilities to fulfill the required 3 acres of parkland.
Policy CD-1.9 Commute Reduction. Minimize the commuting distances between residential concentrations and employment centers by encouraging the development of mixed land uses in appropriate areas.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would provide housing near major employment centers such as Northeast Industrial Area (NIAD), approximately 1,500 feet to the east. Additionally, the proposed commercial uses would also provide nearby employment areas near residences, resulting in shorter commute times to employment opportunities.
Policy CD-1.10 Jobs-Housing Balance. Consider the effects of land use proposals and decisions on efforts to maintain an appropriate jobs-housing balance ratio.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan includes residential uses and commercial uses, which would offer job opportunities to residents. As discussed in **Section 4.14: Population and Housing**, the proposed Project is estimated to increase jobs and

TABLE 4.11-1: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

	housing by a maximum of 98 and 950 units, respectively, well within the projected increases in employment and housing in the City.
Goal CD-3:	**A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.**
Policy CD-3.1 Neighborhood Preservation. Protect existing residential neighborhoods from the encroachment of incompatible activities and land uses as determined through environmental review and/or determination by the Planning Commission.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan would guide the development of a mixed-use neighborhood with residential, commercial, institutional, and open space land uses that are similar to the residential, commercial, institutional, and open space land uses adjacent to the Project Site. Future development within the Project Site would be subject to discretionary review by the City of Oxnard Planning Commission through Site Plan and Design Review and related entitlement processes. During this review, the Planning Commission would evaluate building massing, height, setbacks, architectural design, circulation, and site layout to ensure that proposed uses are compatible with adjacent residential neighborhoods, commercial areas, and public facilities, including Del Sol High School and nearby park uses.
Policy CD-3.3 Innovative Redevelopment. Promote innovative design flexibility and possibly different residential densities in public and public/private redevelopment within existing neighborhoods through the use of alternative performance-oriented development standards, alternative development designs, development agreements, specific plans, mixed uses, and other development and planning techniques.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan under the NECSP would allow flexibility in development guidelines such as residential densities ranging from six to 40 du/ac to develop a unique mixed-use neighborhood. Additionally, the proposed Sub-Neighborhood Plan would have trails, paseos, and walkways that connect land uses, and have scaled pedestrian commercial uses along walkways that would create and promote walkable spaces.
Goal CD-4:	**Commercial uses compatible with surrounding land uses to meet the present and future needs of Oxnard residents, employees, and visitors.**
Policy CD-4.1 Mitigate Land Use Conflicts. Mitigate conflicts between commercial and other land uses, especially residential and recreational uses.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan allows commercial uses that would include residential-serving uses, including but not limited to a restaurant, café, daycare, which are compatible to residences and the commercial in the surrounding area.
Policy CD-4.5 Commercial Signage. Require that signage in commercial development improve, rather than detract, from the quality of the surrounding neighborhood.	**Level II - Consistent**. The proposed commercial uses would have signage that would adhere to the City's General Plan and Municipal Code regulations and would improve, rather than detract from the quality of the surrounding neighborhood.
Goal CD-6:	**Continued agriculture use within the Planning Area, compatible with the community's vision.**
Policy CD-6.1 Agricultural Buffers. Require that agricultural land uses designated for long-term protection and production be buffered from urban land uses through the use of techniques including, but not limited to,	**Level II - Consistent**. The Project Site is not designated for long-term protection and production for agricultural use in the City's 2030 General Plan.

TABLE 4.11-1: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

greenbelts, open space setbacks, fencing, berming, and windrows.	The Project Site is designated for residential, commercial, and open space use by the City's General Plan.
Policy CD-6.2 Agricultural Preservation. Preserve agricultural land and uses within the Oxnard Planning Area unless other uses are allowed through a future CURB amendment and/or applicable exemptions	**Level II - Consistent**. As detailed above in Policy CD-6.1, the Project Site does not have a General Plan land use or zoning designation of Agriculture, and is located within the City's existing CURB.
Goal CD-7:	**Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.**
Policy CD-7.1 Establishment of Urban Villages. Six areas of the City are initially designated as Urban Villages. It is the intent of the Urban Village designation that specific or strategic plans for each area will be prepared in advance of the planning entitlement process. Additional Urban Villages and guidelines may be subsequently adopted by the City Council. Urban Villages are envisioned as characterized by: Infill and/or development of formerly agricultural land Reinvestment in the existing community Mixture of land uses Mix of residential densities and housing types Providing a minimum of 15 percent affordable housing Location along or near corridors, downtown, and transit nodes Transit, pedestrian, and bicycle circulation given high priority	**Level I - Consistent**. The Project Site is designated as one of the six urban villages, East Village Phase III, within the City. The proposed Sub-Neighborhood Plan would allow the development of mixed-use neighborhoods consistent with the Urban Village designation for the Project Site. The proposed Sub-Neighborhood Plan would guide the development of an infill site formerly used for agriculture; provide a variety of land uses including residential, commercial, and open space uses; provide a mix of residential types and densities; would have 15% of residential units designated for affordable housing; be located along corridors such as Rose Avenue and transit such as GCTD; and provide pedestrian amenities such as multi-use paths, paseos, sidewalks and bicycle lanes.
Policy CD-7.5 Pedestrian and Transit Scale. Design urban village areas to be pedestrian-oriented and transit accessible, incorporating block patterns, walking routes and edges, social orientation of buildings, and streetscapes to provide ease of walking and safety.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would include pedestrian, bicycle and transit-oriented infrastructure with multi-use trails, paseos, sidewalks, bicycle lanes, and GCTD bus stops within and along the Project Site. Wide sidewalks, well shaded with trees and lined with human-scaled street lighting provide a welcoming pedestrian experience. Lane widths would be narrow to keep traffic speeds low, and therefore compatible with the presence of pedestrians and cyclists. Additionally, the proposed Sub-Neighborhood Plan would have residential-serving commercial uses and parks throughout the Project Site accessible by bicycle and pedestrian linkages to encourage non-vehicular travel.
Policy CD-7.6 Connectivity. Provide connectivity to other activity nodes in the form of roadways, transit connections, and bicycle and pedestrian linkages that encourages non-vehicular travel modes. Urban villages should be considered major transit transfer points and have amenities oriented towards transit users.	**Level I - Consistent**. Same as cell above.

TABLE 4.11-1: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN	
Policy CD-7.7 Urban Village Streetscapes and Identification. Include streetscape and signage programs in roadway improvements that provide each area a unique identification and enhance the functionality and beauty of entry corridors. Ensure that planned roadway improvements do not conflict with other policies that encourage pedestrian activities and circulation.	**Level II - Consistent**. Development allowed by the Sub-Neighborhood Plan would have human-scaled development with commercial uses fronting pedestrian areas; pedestrian paths that link different land uses and portions of the Project Site; and parking areas in the rear of lots to provide a unique identification, functionality, and beauty of entry corridors. Additionally, the proposed Sub-Neighborhood Plan would be required to be consistent with the City's streetscape, signage, pedestrian, and circulation regulations.
Policy CD-7.8 Road Design. Reflect the residential and commercial activities of the urban village area by using appropriate roadway widths for road and streetscape design.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan would adhere to the City's adopted standards governing roadway widths and streetscape design. Internal roadways within the Sub-Neighborhood are intentionally designed with reduced lane widths and enhanced streetscape elements to promote traffic calming, encourage lower vehicle speeds, and create a pedestrian-oriented, human-scaled environment consistent with the character and functional objectives of an urban village.
Policy CD-7.9 Infrastructure Compatibility. Ensure new development within each urban village complies with the City's adopted infrastructure master plans and provides fair share contributions towards existing and future improvements necessary to serve the development.	**Level II - Consistent**. As discussed in **Section 4.18: Utilities and Service Systems**, development of the Sub-Neighborhood Plan would connect to existing water, wastewater, storm drain, and roadway infrastructure systems and would be required to comply with the City's Public Works Integrated Master Plan (PWIMP), Wastewater Collection System Master Plan and Stormwater Master Plan. Infrastructure improvements would be designed in accordance with these adopted plans to ensure adequate capacity and system performance.
Policy CD-7.11 Urban Village Open Space Areas/Parks. Park sizes and locations shall follow City standards and be within walking distance of a majority of the population.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan includes a variety of proposed parks and expands the existing East Village Park within walking distance from all the proposed residences of the Project.
Policy CD-7.13 Urban Village Trail and Open Space Connections. Include trails (pedestrian and bicycle) and open space areas, where feasible within urban village areas. These facilities shall create a network that links urban villages and other neighborhoods to each other.	**Level II - Consistent**. As shown in **Figure 2-18: Pedestrian and Bike Network**, the proposed Sub-Neighborhood Plan incorporates multi-use trails, bike lanes, paseos, and sidewalks throughout the Project Site that link different land uses within the Project Site and surrounding area. Linkages also include proposed open space areas.
Goal CD-8:	**Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.**
Policy CD-8.1 Limiting Development. Continue to limit development to those areas that can be served by existing or planned utilities, transportation, and service systems.	**Level II - Consistent**. As discussed in **Section 4.18: Utilities and Service Systems**, the proposed Sub-Neighborhood Plan would be adequately served by groundwater allocated to the Project Site by the City and

TABLE 4.11-1: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

	would fall within the available capacity of Southern California Edison (SCE), SoCalGas, the Oxnard Wastewater Treatment Plant (OWTP), and existing regional landfills. The Project would also construct stormwater infrastructure in compliance with applicable stormwater discharge regulations and water quality requirements. As discussed in **Section 4.16: Transportation**, the proposed Sub-Neighborhood Plan would incorporate roadway and traffic improvements and would not cause intersections to exceed the cumulative level of service (LOS) standards identified in the City's General Plan. As discussed in S**ection 4.15: Public Services and Recreation**, and based on coordination with City fire and police departments and the applicable school districts, the proposed Sub-Neighborhood Plan would be adequately served by fire protection, police protection, schools, parks, and library services, with payment of applicable development impact fees to ensure fair-share contributions toward facilities and services.
Policy CD-8.2 Services. Continue to ensure that public services and facilities are in place at the time of need or prior to the time new development occurs in order to avoid overloading existing urban service systems.	**Level II - Consistent**. As discussed in **Section 4.15: Public Services and Recreation**, and based on coordination with City fire and police departments and the applicable school districts, the proposed Sub-Neighborhood Plan would be adequately served by fire protection, police protection, schools, parks, and library services, with payment of applicable development impact fees to ensure fair-share contributions toward facilities and services.
Policy CD-8.5 Impact Mitigation. Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.	**Level I – Consistent.** As discussed in **Section 4.3: Air Quality**, the proposed Sub-Neighborhood Plan would exceed air quality thresholds during construction; however, **MM AQ-1** would be incorporated to ensure construction equipment meets U.S. EPA Tier 4 final standards as applicable, reducing air quality construction impacts to less than significant. As discussed in **Section 4.16: Transportation**, the proposed Sub-Neighborhood Plan could cause traffic congestion during construction with temporary lane closure from construction activities; however, **MM TRANS-1** would incorporate a Construction Management Plan (CMP) that would regulate traffic circulation within and surrounding the Project Site during construction, reducing traffic congestion impacts to less than significant. As discussed in **Section 4.13: Noise**, the proposed Sub-Neighborhood Plan would exceed applicable noise thresholds during construction; however, **MM NOI-1**

TABLE 4.11-1: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

	would incorporate construction noise reducing measures such as mufflers, distant staging location, and noise barriers, reducing noise construction impacts to less than significant.
Policy CD-8.7 Community Balance. Create an appropriate balance between urban development and preservation of agricultural uses by promoting development within the CURB while designating land outside the CURB as Resource Protection, Open Space or Agricultural land use, unless otherwise allowed through a CURB amendment and/or exemptions from the SOAR ordinance	**Level II - Consistent**. The Project Site is located within the City's CURB. Therefore, the proposed Sub-Neighborhood Plan would maintain the City's goal of preserving agricultural land that is outside of the CURB.
Policy CD-8.8 Public Facility Service Areas. Provide appropriate service areas for existing and planned public facilities such as a museum, secondary and elementary schools, fire stations, branch libraries, community centers, parks, and infrastructure utility for support facilities	**Level I - Consistent**. As discussed in **Section 4.15: Public Services and Recreation**, and based on coordination with City fire and police departments and the applicable school districts, the proposed Sub-Neighborhood Plan would be adequately served by fire protection, police protection, schools, parks, and library services, with payment of applicable development impact fees to ensure fair-share contributions toward facilities and services.
Policy CD-8.10 Timing of Large-Scale Development. Consider at an early stage the infrastructure investment needs of large-scale developments in order to evaluate these needs as part of long-range water supply, conveyance, wastewater, and other relevant planning.	**Level II - Consistent**. As discussed in **Section 4.18: Utilities and Service Systems**, the proposed Sub-Neighborhood Plan would be adequately served by groundwater allocated to the Project Site by the City and would fall within the available capacity of Southern California Edison (SCE), SoCalGas, the OWTP, and existing regional landfills. The Project would also construct stormwater infrastructure in compliance with applicable stormwater discharge regulations and water quality requirements.
Goal CD-10: Neighborhoods and urban villages with a distinct sense of place.	
Policy CD-10.1 Human-Scale Development. In the evaluation of development proposals, require urban development on a human scale, by emphasizing the pedestrian experience over the movement and storage of vehicles.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan is a comprehensive plan to create a walkable and livable community by providing pedestrian amenities such as nearby parks, residential-serving commercial uses, multi-use paths, and paseos that would reduce reliance on automobile travel. Wide sidewalks, well shaded with trees and lined with human-scaled street lighting will create a welcoming pedestrian experience. Lane widths would be narrow to keep traffic speeds low, and therefore compatible with the presence of pedestrians and cyclists.
Policy CD-10.2 Neighborhood Themes. In the evaluation of development proposals, require neighborhood themes and principles of design, such as neotraditional town planning, which include central parks, schools, and community and commercial facilities, strong pedestrian	**Level II - Consistent**. The proposed Sub-Neighborhood Plan incorporates neotraditional town planning concepts and includes parks, a school, commercial facilities and a variety of pedestrian options to reduce

TABLE 4.11-1: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN	
orientation and de-emphasis of automobile related elements in new development projects.	reliance on automobile travel by providing residential-serving land uses near the proposed residences.
Chapter 7: Military Compatibility	
Goal MC-2:	**Participation of Naval Base Ventura County (NBVC) personnel and their dependents and Oxnard government and residents in planning and development decision-making processes that may impact NBVC and/or, conversely, the City and its residents.**
Policy MC-2.5 CEQA Notification. Continue to provide CEQA notifications to NBVC for review and comment on City discretionary land use actions to include, but not limited to, General/Specific Plan/Coastal Plan amendments, zone changes, tract or parcel maps, and special use or coastal development permits	**Level II - Consistent**. The proposed Sub-Neighborhood Plan requires a Specific Plan amendment, General Plan amendment, a Zone change and tract map. Therefore, the NBVC would be notified about the proposed Project through different public notice periods including the Notice of Preparation (NOP) and the Notice of Availability (NOA) where NBVC would be able to review and comment and question the proposed Project.

Source: City of Oxnard. *2030 General Plan*. 2022. Accessed May 2025. https://www.oxnard.gov/wp-content/uploads/2023/10/Oxnard-2030-General-Plan-Amend-12.2022-SMda.pdf.

As discussed above, the proposed Project would be consistent with all applicable land use goals and policies of the General Plan and development of an urban village.

NECSP

As noted above, the Project Site is within the NECSP. The proposed Sub-Neighborhood Plan would amend the NECSP, which currently designates the Project Site for Low Density Residential (4.5 du/ac) and Neighborhood Commercial uses (see **Figure 4.11-1**). The proposed Sub-Neighborhood Plan proposes a broader mix of residential, commercial, and open space uses consistent with the Urban Village Overlay for the Project Site and the NECSP, which allows a sub-neighborhood plans to allow for modifications to the existing development standards to create distinctive neighborhoods aligned with the NECSP's goals and objectives. Importantly, any area considered for a sub-neighborhood plan must meet all established sub-neighborhood plan criteria set forth in the NECSP.

Table 4.11-2: Project Consistency with NECSP provides an assessment of the consistency of the Project with the NECSP goals and objectives, and sub-neighborhood criteria.

TABLE 4.11-2: PROJECT CONSISTENCY WITH NECSP	
Goals	
Establish a framework for the orderly buildout of the Specific Plan Area in order to minimize development and energy costs and efforts on adjacent land uses including interim agricultural activities.	**Consistent**. The proposed Sub-Neighborhood Plan is a comprehensive development plan that would provide a variety of housing near workplaces, a school, parks, transit stops, pedestrian facilities, and commercial areas that would reduce energy costs related to vehicle miles traveled (VMT) by having residential-serving uses near the proposed housing units. Additionally, the development of the proposed Sub-Neighborhood Plan would connect the Project Site to the surrounding residential, commercial

TABLE 4.11-2: PROJECT CONSISTENCY WITH NECSP	
	and open space areas that are not currently connected. Furthermore, the Project Site is designated as an Urban Village in the City's General Plan, which also provides a comprehensive development framework for the Project Site that aligns with the requirements of SB 375 (Sustainable Community Strategy) and NECSP sub-neighborhood plans.
Integrate a significant public and semi-public facility requirement (schools, parks and medical center) into livable residential neighborhoods.	**Consistent**. The proposed Sub-Neighborhood Plan allows for public facilities, including Del School High School and parks that would be integrated into the proposed mixed-use neighborhoods in Areas A and C.
Take full advantage of the location of the NECSP next to the Northeast Industrial Area (NIAD) which is a major employment generator. Such proximity affords the opportunity for persons to live closely to jobs and in turn provides the ability to reduce vehicle trips, improve air quality and reduce energy costs.	**Consistent**. The proposed Sub-Neighborhood Plan would provide up to 950 residential units near the NIAD, and commercial and park uses that would reduce VMT in the general Project area by providing complementary land uses that are connected by alternative transportation options to improve air quality and reduce energy costs by providing these amenities nearby proposed residential areas. See **Section 4.16: Transportation** for further details on VMT.
Create new types of neighborhoods which borrow from the best attributes of pre- World War II neighborhoods and post-war style residential development to promote pedestrian and resident-friendly neighborhoods which diminish reliance on private vehicles and particularly provides safe environments for children and all residents.	**Consistent**. The proposed Sub-Neighborhood Plan would guide the development of mixed-use neighborhoods that include residential and neighborhood-serving commercial uses, as well as park areas. The proposed Sub-Neighborhood Plan would incorporate pedestrian-friendly facilities such as multi-use paths, bicycle lanes, and bus transit stops. These features would help reduce reliance on private vehicles and create a safer environment for residents and children.
Integrate all of the proposed land uses in a compatible manner and ensures that public facilities such as parks and schools are developed concurrent with the identified need.	**Consistent**. The proposed Sub-Neighborhood Plan would allow residential, commercial and open space land uses in Areas A and C that are compatible with the existing Del Sol High School in Area B and the residential, commercial and open space areas adjacent to the Project Site.
Objectives	
Provide an environment that would encourage neighborhood interaction and strengthen neighborhood cohesiveness.	**Consistent**. The proposed Sub-Neighborhood Plan would develop neighborhoods containing commercial, open space and pedestrian facilities that would encourage neighborhood interaction and neighborhood cohesiveness. Wide sidewalks, well shaded with trees and lined with human-scaled street lighting provide a welcoming pedestrian experience. Lane widths would be narrow to keep traffic speeds low, and therefore compatible with the presence of pedestrians and cyclists.

TABLE 4.11-2: PROJECT CONSISTENCY WITH NECSP	
Provide a balanced mix of residential, commercial and institutional uses in a compatible manner and arrangement.	**Consistent**. The proposed Sub-Neighborhood Plan would allow residential, commercial and open space land uses in Areas A and C that are compatible with the existing Del Sol High School in Area B and the residential, commercial and open space areas adjacent to the Project Site.
Provide a balance of housing and employment opportunities and offer a means to integrate living and working environments.	**Consistent**. The proposed Sub-Neighborhood Plan would allow development of up to 950 residential units near the NIAD and commercial uses that would provide a means of integrating living and working environments.
Ensure that public facilities and social and human services are available to serve the community.	**Consistent**. The proposed Sub-Neighborhood Plan includes a school, parks and commercial uses within the Project Site that would provide public facilities and facilitate social and human services.
Provide a pedestrian-oriented environment by locating neighborhood services, recreation, and community facilities within walking distance of residences.	**Consistent**. The proposed Sub-Neighborhood Plan includes parks and commercial land uses within walking distance of the proposed residential uses.
Blend the development of the Northeast Community Specific Plan Area with the adjacent communities.	**Consistent**. The Project Site is surrounded by the NECSP area to the north, east and west. The proposed Sub-Neighborhood Plan would allow residential, commercial and open space uses that are compatible with the residential, commercial and open space uses adjacent to the Project Site. To promote compatibility, the proposed Sub-Neighborhood Plan includes an edge overlay zone that would limit the height of buildings adjacent to nearby residences adjacent to the Project Site to create a consistent development pattern. Therefore, the proposed Project would be consistent with these objectives.
Ensure compatibility with adjacent, existing neighborhoods.	**Consistent**. Same as cell above.
Provide a positive fiscal impact to the City of Oxnard.	**Consistent**. The proposed Sub-Neighborhood Plan would allow the development residential and commercial uses that would provide additional tax revenue for the City .
Provide a mix of housing to serve market demand and varied segments of the population, specifically addressing the need for affordable housing.	**Consistent**. The proposed Sub-Neighborhood Plan would allow a variety of housing options including single-family attached, single-family detached, and multi-family attached. Additionally, 15% of the housing units would be reserved for affordable housing.
Develop a model community with an emphasis on energy efficiency and environmental quality and sustainability.	**Consistent**. The proposed Sub-Neighborhood Plan would develop compatible land uses that would reduce VMT due to proximate distance and uses. Additionally, all residential and commercial buildings would meet currently applicable energy conservation standards including California Building Code (CBC) and the City's Climate Action and Adaption Plan (CAAP) as discussed in **Section 4.6: Energy**.

TABLE 4.11-2: PROJECT CONSISTENCY WITH NECSP	
Minimizing vehicular traffic by including easily accessible and convenient commercial uses within the Specific Plan area, and providing convenient pedestrian and bicycle paths connecting to major uses, such as schools, medical facilities, and transit station.	**Consistent**. The proposed Sub-Neighborhood Plan would include commercial uses, parks, and pedestrian and bicycle paths throughout the Project Site. Additionally, there are schools, medical facilities, transit stations, and bus stops within or in the vicinity of the Project Site.
Providing public facilities, including schools, medical centers, churches, park and recreation facilities, and community service facilities within the Specific Plan area.	**Consistent**. The proposed Sub-Neighborhood Plan would include public facilities including Del Sol High School and neighborhood parks.
Establishing specific landscape guidelines and standards to coordinate physical appearance throughout the Specific Plan area.	**Consistent**. The proposed Sub-Neighborhood Plan would comply with the landscaping and design guidelines of the NECSP, including Section 8.5: Public Landscape, which requires cohesive and high-quality landscaping within the Specific Plan area. The Project would also adhere to the applicable landscaping and development standards of the City's Municipal Code.
Maximizing efficiency in construction of infrastructure by coordinating phasing and sizing of improvements with development of the area.	**Consistent**. The proposed Sub-Neighborhood Plan would be developed in two overlapping phases with the first phase including development of the North Neighborhood in Area A, and the second phase including the Southwest Neighborhood in Area C to maximize efficiency in construction of infrastructure. Building the project in phases allows roads, utilities, and storm drains to be constructed in step with each phase of development rather than all at once. This reduces the need for temporary improvements and avoids rebuilding or upsizing infrastructure later. It also allows completed portions of the project to function independently while other areas are still under construction.
Criteria for a Sub-Neighborhood Plan	
The area is at least 80 acres.	**Consistent**. The Project Site is approximately 107 acres.
The plan provides public spaces (e.g., schools, parks, bicycle lanes, and pedestrian pathways other than sidewalks).	**Consistent**. The proposed Sub-Neighborhood Plan includes a school, parks, bicycle lanes and pedestrian pathways such as multi-use paths, and paseos.
Development proposed within the plan area provides benefits to the City that are in addition to the benefits provided by the NECSP (e.g. more affordable housing projects, senior assisted housing projects, a mixture of commercial and residential uses).	**Consistent**. The proposed Sub-Neighborhood Plan would provide affordable housing, and a mixture of residential and commercial uses.

Source: City of Oxnard. *Northeast Community Specific Plan*. 1993. Accessed May 2025. https://www.oxnard.gov/wp-content/uploads/NECSP3.pdf.

As discussed above, the proposed Sub-Neighborhood Plan is consistent with the NECSP goals and objectives, and the criteria for a sub-neighborhood plan. As sub-neighborhood plans are adopted as amendments to the NECSP, the proposed Sub-Neighborhood Plan requires a corresponding General Plan Amendment and Zone Change for the Project Site as shown in **Figure 4.11-2: Tentative Tract**

Map. The Project Site's General Plan land use designations would change from RLM, CG and PRK to R H (Residential High), CG and PRK. The Project Site's zoning designations would change from R-2-PD, C-2-PD) and C-R to Specific Plan with sub-zoning designations of Open, Open (Commercial Allowed), Neighborhood, and Parks and Open Space. The existing Urban Village Overlay would remain in place. The proposed Project's General Plan Amendment and Zone Change would allow the development of mixed-uses throughout the Project Site and allow a maximum height of four stories consistent with the maximum height of the proposed buildings.

Connect SoCal

Table 4.11-3: SCAG Connect SoCal Consistency Analysis provides an assessment of the consistency of the Project with the SCAG Connect SoCal goals.

TABLE 4.11-3: SCAG CONNECT SOCAL CONSISTENCY ANALYSIS

Goal/Subgoal	Analysis
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality, and greenhouse gas emissions.	**Consistent.** The proposed Sub-Neighborhood Plan would allow development of a mixed-use neighborhood with residential, commercial, and open space uses in proximity to one another to reduce VMT, air quality emissions, and GHG emissions. The Project would provide a variety of transportation choices such as multi-use paths, paseos, and sidewalks for pedestrians; bicycle lanes for bicyclists; and GCTD stops for bus transit to reduce VMT and reliance of automobiles.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**Consistent.** The proposed Sub-Neighborhood Plan would provide a variety of reliable, accessible, affordable, and appealing transportation choices including multi-use paths, paseos, and sidewalks for pedestrians; bicycle lanes for bicyclists; and GCTD bus stops
Support planning for people of all ages, abilities, and backgrounds	**Consistent.** The proposed Sub-Neighborhood Plan is a comprehensive plan to develop neighborhoods with a variety of housing, commercial uses, and open spaces for people of all ages. The proposed parks would be developed with the "Power of 10+" concept providing at least 10 types of activities, from active to passive, for children and adults of all ages and abilities. There would also be a variety of transportation options for people of different ages, abilities, and backgrounds.
Communities: Develop, connect, and sustain livable and thriving communities.	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	**Consistent.** The proposed Sub-Neighborhood Plan is a comprehensive development plan that would provide a variety of housing near workplaces, a school, parks, transit stops, pedestrian facilities, and commercial areas that would reduce travel distances by having residential-serving uses near the proposed housing units.

TABLE 4.11-3: SCAG CONNECT SOCAL CONSISTENCY ANALYSIS

Goal/Subgoal	Analysis
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	**Consistent.** The proposed Sub-Neighborhood Plan would allow a variety of single-family detached, single-family attached and multi-family attached homes. Additionally, 15% of the proposed homes would be designated for affordable housing.
Environment: Create a healthy region for the people of today and tomorrow.	
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions, and enable more sustainable use of energy and water.	**Consistent.** The proposed Sub-Neighborhood Plan would create a mixed-use neighborhood with residential, commercial, and open space uses in proximity to one another to reduce VMT, air quality and GHG. The Project would provide a variety of transportation choices such as multi-use paths, paseos, and sidewalks for pedestrians; bicycle lanes for bicyclists; and GCTD stops for bus transit to reduce VMT and reliance of automobiles. All residential and commercial buildings developed would meet current and future energy conservation standards.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.	
Improve access to jobs and educational resources.	**Consistent.** The proposed Sub-Neighborhood Plan would allow residential uses near major employment centers in the City of Oxnard, such as the NIAD, and provide additional nearby employment opportunities with proposed commercial uses. Additionally, the Sub-Neighborhood Plan Area includes Del Sol High School and is adjacent to Rio Rosales Elementary School.

Source: Southern California Association of Governments (SCAG). *Connect SoCal*. 2024. https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf.

The analysis in the above table concludes that the Project would be consistent with the applicable SCAG Connect SoCal goals.

Therefore, with the approval of a Specific Plan Amendment, General Plan Amendment, and Zone Change, the proposed Sub-Neighborhood Plan would not conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating a significant environmental effect, resulting in less than significant impacts.

4.11.6 Cumulative Impacts

As detailed in the City's 2030 General Plan EIR, future development will follow the land use distribution and circulation framework in the General Plan to ensure compatibility among uses. Development will occur in accordance with adopted standards, policies, and ordinances, and will not introduce land uses or circulation features that would physically divide existing communities. The General Plan goals, policies, and implementation measures are also consistent with regional

planning efforts. Therefore, the project's incremental contribution to potential land use and circulation impacts would be less than cumulatively significant.

As discussed above, the proposed Sub-Neighborhood Plan is a comprehensive plan to allow development of the Project Site consistent with the Urban Village designation for the site. Sub-neighborhood plans are adopted as amendments to the NECSP and require a corresponding General Plan Amendment and Zone Change. The proposed Project, with approval of General Plan Amendment and Zone Change, would be consistent with the City's long-range land use goals and policies. It would not introduce land use incompatibilities or physically divide an established community. Therefore, while the Project contributes to the overall urbanization of the area, the Project would not contribute to any significant cumulative impacts.

Cumulatively, implementation of the proposed Project along with other planned development under the City's 2030 General Plan would result in increased land use intensity and infill development throughout the City. While some future projects may require discretionary approvals—such as General Plan Amendments, Zone Changes, Variances, or Tract Maps—each would be evaluated individually for consistency with the General Plan and other applicable land use policies. Projects unable to demonstrate land use compatibility or meet required findings would not be approved.

Although increased development density may result in cumulative environmental impacts related to other environmental topics, those impacts are addressed in their respective sections of this EIR. These do not reflect cumulative land use conflicts. Therefore, the Project would not contribute to any significant cumulative impacts.

4.11.7 Level of Significance Before Mitigation

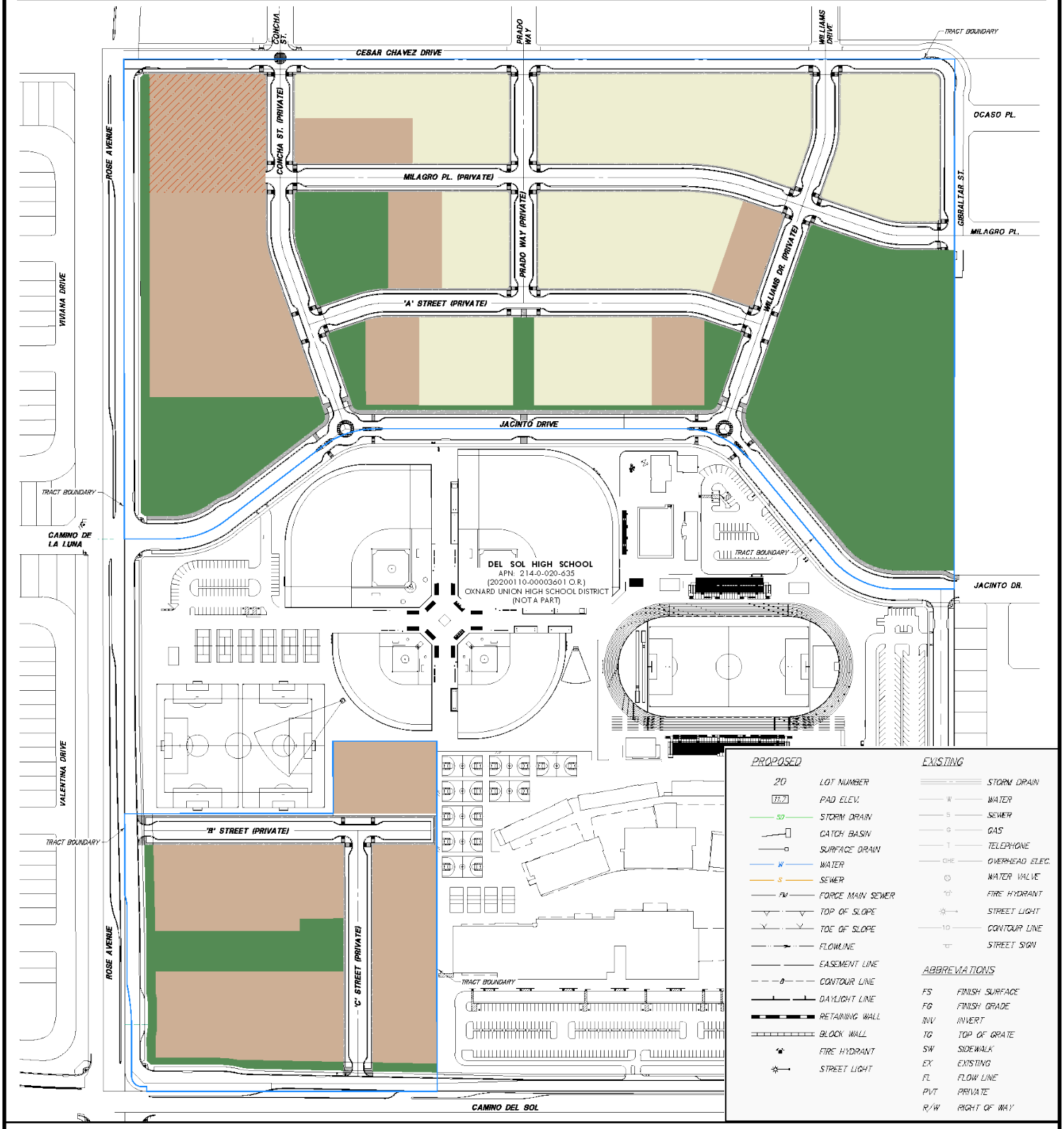
Impacts would be less than significant without mitigation.

4.11.8 Mitigation Measures

No mitigation measures are required.

4.11.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.



Legend: Zoning:

- Specific Plan (S-Plan), Open Residential High (RH)
- Specific Plan (S-Plan), Open, Commercial Allowed, Commercial General (CG)
- Specific Plan (S-Plan), Neighborhood, Residential High (RH) Urban Village Overlay
- Specific Plan (S-Plan), Parks and Open Space, Urban Village Overlay

N

0 100 200 400

APPROXIMATE SCALE IN FEET

SOURCE: Sanbell - 2025.

FIGURE **4.11-2**

Meridian Consultants

Tentative Tract Map

408-001-24

4.12 MINERAL RESOURCES

This section evaluates the potential impacts of the proposed Project on mineral resources. The analysis considers whether the Project would result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site, classified by applicable General Plan designations or State mapping (e.g., Mineral Resource Zones), and whether Project development would interfere with the extraction of such resources. The analysis is based on available geologic and mineral resource mapping, General Plan policies, and applicable regulatory frameworks.

4.12.1 Existing Conditions

Mineral Resources

According to the City's General Plan, important mineral resources such as mineral, sand, and gravel deposits are primarily located along the Santa Clara River channel, the US 101 corridor, and the eastern edge of the City extending as far west as Oxnard Boulevard in several areas.[1]

The California Geological Survey (CGS) classifies land into Mineral Resource Zones (MRZ) to indicate the potential for significant mineral resources. MRZ-1 represents areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. MRZ-2 represents areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. MRZ-3 represents areas containing mineral deposits, the significance of which cannot be evaluated from available data. MRZ-4 represents areas where available information is inadequate for assignment to any other MRZ. Areas of significant mineral deposits within the City are identified as MRZ-2 and MRZ-3 areas.[2]

As shown in **Figure 4.12-1: Mineral Resources**, approximately 36 acres in the northern portion of the Project Site are classified as MRZ-2, 12 acres in the southern portion as MRZ-3, and 58 acres in the central portion as MRZ-4.

CGS Special Report 253 (Special Report 253) identifies the northern portion of the Project Site as MRZ-2 and Mineral Sector C, which is identified as containing regionally significant construction

1 City of Oxnard. *2030 General Plan Goals and Policies*. Adopted October 2011, includes amendments through December 2022. P. 1-23. Accessed January 2025. https://www.oxnard.gov/wp-content/uploads/Oxnard-2030-General-Plan-Amend-12.2022-SMc.pdf.

2 City of Oxnard. *2030 General Plan Draft Program Environmental Impact Report Volume I of II*. February 2009. P. 5-34. Accessed January 2025. https://www.oxnard.gov/wp-content/uploads/2030_GP_Vol_I_Draft_PEIR_Feb_09.pdf.

aggregate resources. As identified in Special Report 253, the MRZ-2 portion of the Project Site is the last remnant in this part of the City not yet lost to incompatible land uses.[3]

Oil and Gas Fields and Wells

Four oil and gas fields are located within the City: West Montalvo, El Rio, Santa Clara Avenue and Oxnard. Additionally, 50 abandoned oil well sites are located within the City outside the four oil field boundaries.[4] Based on the Department of Conservation's (DOC's) Well Finder and **Figure 4.12-2: Oil and Gas Fields and Wells**, the Project Site is located within the Oxnard Oil Field, yet there are no active oil or gas wells within or immediately adjacent to the Project Site.[5]

4.12.2 Regulatory Framework

Federal

There are no federal regulations associated with mineral resources applicable to the Project.

State

Surface Mining and Reclamation Act (SMARA)

The Surface Mining and Reclamation Act (SMARA), Public Resources Code (PRC) Sections 2710, et seq., was enacted in 1975 and established a State surface mining and reclamation policy. This policy ensures that 1) adverse environmental effects are prevented or minimized and that mined lands are reclaimed to a usable condition which is readily adaptable for alternative land uses; 2) the production and conservation of minerals are encouraged, while giving consideration to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment; and 3) residual hazards to the public health and safety are eliminated.[6]

Specifically, the SMARA provides for the reclamation of mined lands and directs the State Geologist to classify (identify and map) the non-fuel mineral resources of the State to show where economically significant mineral deposits occur and where they are likely to occur based upon the best available scientific data. Non-fuel mineral resources include metals such as gold, silver, iron, and copper; industrial minerals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone; and construction aggregate, which includes sand, gravel, and crushed stone.[7]

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3 California Department of Conservation (DOC). "SMARA Mineral Land Classification." Accessed January 2025. https://www.conservation.ca.gov/cgs/minerals/mineral-land-classification-smara.

4 City of Oxnard. *Draft Background Report City of Oxnard General Plan*. April 2006. P. 5-83. Accessed January 2025. https://www.oxnard.gov/wp-content/uploads/OxnardDraftBackgroundReport2006_04.21.06.pdf.

5 DOC. "WellFinder—CalGEM GIS Powered by WellSTAR." Accessed April 2025. https://maps.conservation.ca.gov/doggr/wellfinder/.

6 California Public Resources Code, Division 2, Chapter 9, Section 2712.

7 DOC. "Mineral Resources and Mineral Hazards Mapping Program." Accessed April 2025. https://www.conservation.ca.gov/cgs/minerals/program.

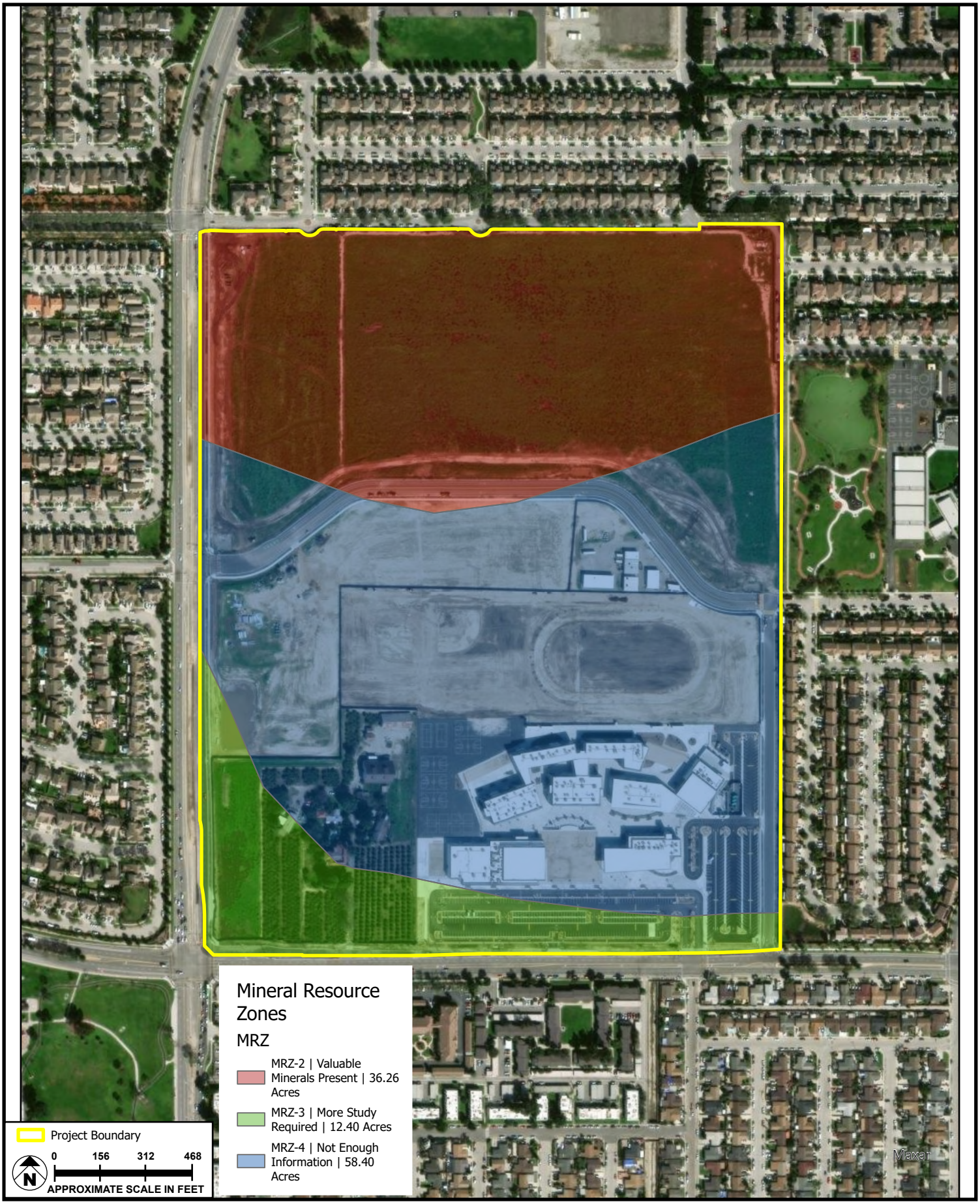
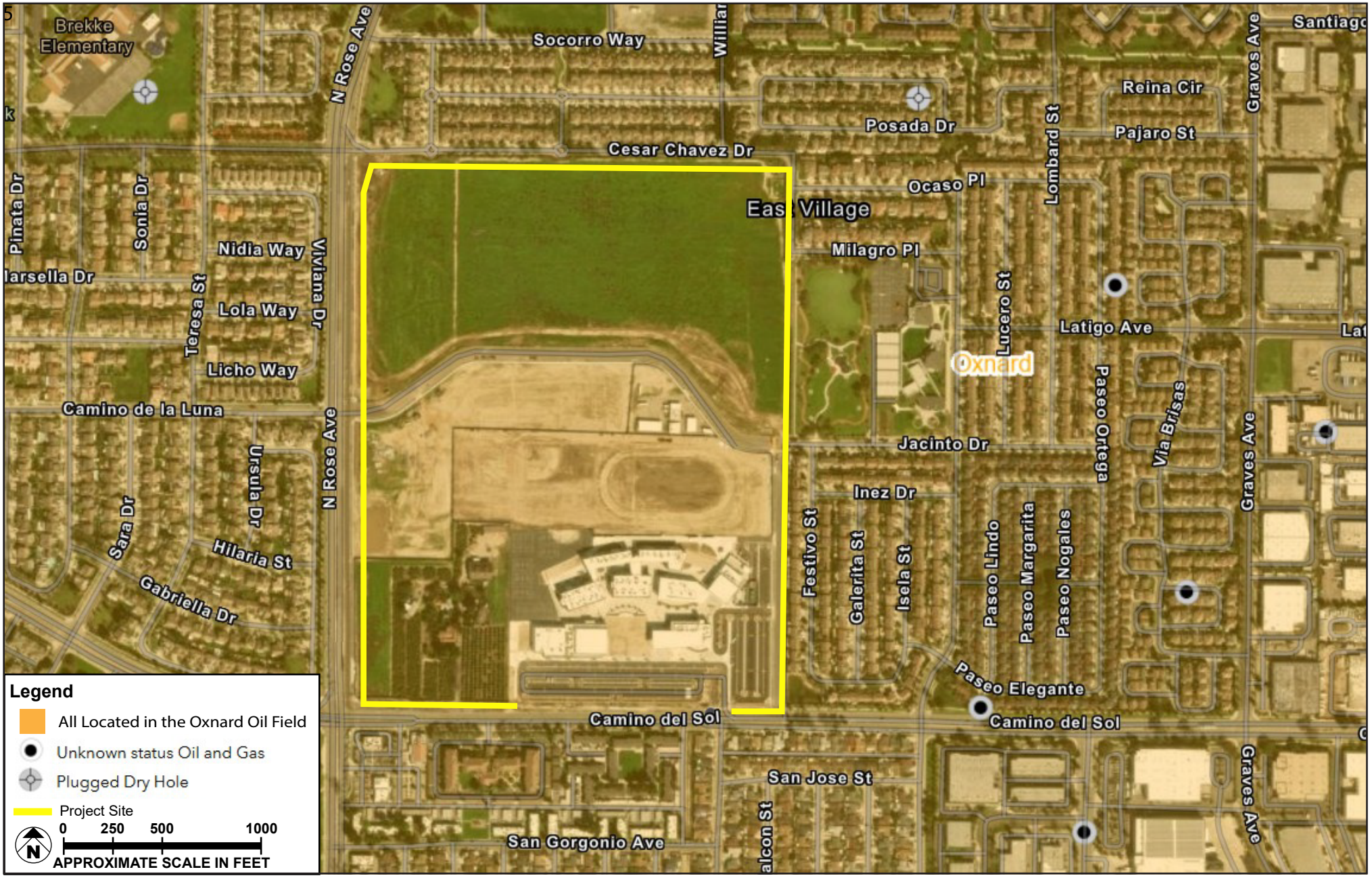


FIGURE **4.12-1**

Meridian Consultants

Mineral Resources



SOURCE: Department of Conservation – 2024

FIGURE **4.12-2**

Meridian Consultants

Oil, Gas Fields and Wells

408-001-24

Under SMARA, the State Geologist has designated MRZs, based on a geologic appraisal of the mineral resource potential of the land. This appraisal includes research of geologic and mining-related literature, compilation of geologic maps, and plotting of reported mines and prospects using publications and mine data of the Department of Conservation Division of Mines and Geology (CDMG), U.S. Geological Survey (USGS), the former U.S. Bureau of Mines, and the Bureau of Land Management (BLM). Establishment of MRZs also involves field work that includes site investigations of mines and mineral prospects, sampling of rocks for chemical and physical analyses and petrographic studies, geophysical surveys, and geologic mapping as appropriate. Field and analytical data are integrated and evaluated for assigning MRZs to areas in accordance with the mineral classification guidelines adopted by the State Mining and Geology Board.[8]

Four categories of MRZs have been identified: MRZ-1, MRZ-2, MRZ-3, and MRZ-4. MRZ-1 represents areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. MRZ-2 represents areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. MRZ-3 represents areas containing mineral deposits, the significance of which cannot be evaluated from available data. MRZ-4 represents areas where available information is inadequate for assignment to any other MRZ.

Uses considered compatible and incompatible with an MRZ designation are identified in the Mineral Resource Management regulations implementing SMARA. These uses are defined as follows:

- *Compatible Land Use* – Land uses inherently compatible with mining and/or that require a minimum public or private investment in structures and land improvements, and which may allow mining because of the relative economic value of the land and its improvements. Examples of such uses may include, but shall not be limited to, very low density residential, geographically extensive, but low-impact industrial, recreational, agricultural, silvicultural, grazing, and open space.
- *Incompatible Land Use* – Land uses inherently incompatible with mining and/or that require public or private investment in structures, land improvements, and landscaping and that may prevent mining because of greater economic value of the land and its improvements. Examples of such uses may include, but shall not be limited to, high density residential, low density residential with high unit value, public facilities, geographically limited but impact-intensive industrial, and commercial.[9]

Mineral Resources and Mineral Hazards Mapping Program

As required by the SMARA, the State Geologist at the CGS classifies California's diverse non-fuel mineral resources to identify economically significant mineral deposits and potential areas of

8 DOC. *Guidelines for Classification and Designation of Mineral Lands.* In *California Surface Mining and Reclamation Policies and Procedures.* Accessed April 2025. https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf.

9 California Code of Regulations, Title 14, Sections 3675 and 3676.

deposits based upon scientific data. Information relating to California's non-fuel resources, naturally occurring mineral hazards, and active and historic mining activities are collected to classify land under the Mineral Resources and Mineral Hazards Mapping Program. The CGS defines several geographic areas that collectively cover a single mineral classification study as Production-Consumption Regions (P-C Regions). The CGS identifies MRZs for each P-C Region, mine/quarry, or other geographic area included in a mineral classification study. MRZs are areas classified by the presence or absence of significant sand, gravel, or stone deposits which are suitable as sources of aggregate. Construction aggregate is California's primary mineral resource. Lands not addressed by the CGS regarding their mineral content, either within a P-C Region or outside a mineral classification area, are defined as "unclassified."

Division of Oil, Gas, and Geothermal Resources

As part of the State Department of Conservation, the California Geologic Energy Management Division (CalGEM) supervises the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells to protect the environment, and encourage good conservation practices. CalGEM collects data on the location of groundwater, oil, gas, and geothermal resources, and records the location of all drilled and abandoned wells. Existing law requires an operator of a well to obtain approval from the State Oil and Gas Supervisor or district deputy before beginning the work of drilling a well. CalGEM mandated responsibilities are found in PRC Section 3000 and Title 14, Chapter 4 of the California Code of Regulations (California Statutes and Regulations for the Division of Oil, Gas, and Geothermal Resources).

Senate Bill 4

Senate Bill (SB) 4 (Pavley) (California PRC Sections 3015-3161), signed into law in 2013, establishes a regulatory structure for unconventional well stimulation techniques, including fracking and acidization. This Bill directed the Division of Oil, Gas and Geothermal Resources (which was renamed CalGem per Assembly Bill 1057 effective January 2020) to exercise additional requirements over the existing laws that regulate drilling, operations, maintenance, and abandonment of oil and gas wells, tanks, and facilities, in order to increase transparency and accountability to the public regarding well stimulation treatments. Further, the legislation directed CalGEM to develop the nation's first-ever, Statewide permit system to regulate fracking and related drilling technologies, and to have that system in place as of January 1, 2015. That system requires operators of wells to obtain a permit from CalGEM to carry out well stimulation treatments, mandates disclosure of the identity and quantity of chemicals used, and required full disclosure to State regulators, emergency departments, and health professionals. The system also requires operators to notify nearby property owners at least 30 days before any activity, and allows neighbors to request baseline water quality testing. Governor Newsom directed CalGEM to halt new fracking permits by 2024, and CalGEM adopted regulations that phase out well stimulation treatment permitting, which took effect October 1, 2024. As required by SB 4, CalGEM prepares and submits an annual comprehensive report for the California Legislature on well stimulation treatments in the State.

Local

City of Oxnard General Plan

The City's 2030 General Plan Goals and Policies contain relevant goals and policies that are applicable to mineral resources.

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

Policy ER-1.1: ***Protect Oxnard's Natural and Cultural Resources***

Protect the City's natural resource areas, fish and wildlife habitat, scenic areas, open space areas, parks, and cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible.

GOAL ER-13 Well managed extraction of mineral resources that protects the environment and surrounding land uses from adverse effects of extraction operations.

Policy ER-13.3: ***Compatibility with Existing Land Uses***

Ensure that any mining operations produce the least amount of incompatibility with surrounding, existing land uses (i.e., limited hours of operation, pest control, etc.) and adequately mitigate environmental and aesthetic impacts.

4.12.3 Significance Thresholds

a. Would the project result in the loss of availability of a known mineral resource of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated in the 2030 General Plan, Specific Plan, or other land use plan?

4.12.4 Methodology

The methodology for evaluating potential environmental impacts related to mineral resources included a review of City and State documents to identify existing mineral resource conditions at the Project Site.

4.12.5 Project Impacts

a. Would the project result in the loss of availability of a known mineral resource of value to the region and the residents of the state?

Less than Significant Impact.

Although the Project Site has portions designated as MRZ-2, MRZ-3, and Mineral Sector C, many aggregate sites (sand and gravel) exist throughout the County, with most of these extraction sites located in and along the Santa Clara River bed.[10] Special Report 253, published in 2022, identifies the Project Site as containing the last remnants of mineral resources in this portion of the City not lost to incompatible uses. This report, however, reflects the condition of the Project Site prior to the development of Del Sol High School in the central 51 acres (Area B) of the site. With the development of the high school in the central portion of the Project Site, the existing land uses within and surrounding the Project Site are not compatible with mineral resource extraction, and, therefore, the Project would not create any new significant impacts on mineral resources.

The Project Site has also been planned for residential, commercial, and open space development in several approved City land use plans including the City's General Plan and NECSP. The General Plan land use designations for the Project Site are Residential Low-Medium (RLM), Commercial General (CG) and Park (PRK). The zoning for the Project Site is Multiple-Family Residential Planned Development (R-2-PD), General Commercial Planned Development (C2-PD), and Community Reserve (C-R). The existing General Plan land use designations and zoning for the Project Site do not allow mineral resource extraction.

Accordingly, although portions of the Project Site are designated as MRZ-2, MRZ-3, and Mineral Sector C, the Project Site and surrounding areas are incompatible with mineral resource extraction. Additionally, the Project Site is planned for development under the City's land use plans. As such, implementation of the proposed Sub-Neighborhood Plan would not result in the loss of availability of a known mineral resource of value to the region or the residents of the State, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated in an applicable land use plan. Therefore, impacts would be less than significant.

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated in the 2030 General Plan, Specific Plan, or other land use plan?

Less than Significant Impact.

Important mineral/sand/gravel deposits are primarily located along the Santa Clara River channel, along US 101 (Ventura Freeway) corridor, and along the eastern edge of the City extending as far west as Oxnard Boulevard in several areas, which could include the Project Site.[11] Although portions of the City's Planning Area are designated as containing significant mineral resources, development has already occurred within many of these areas, limiting their availability for extraction. The Project

10 County of Ventura. *Ventura County General Plan Goals, Policies, and Programs.* Amended March 20192. P. 16. Accessed April 2025. https://rmadocs.venturacounty.gov/images/pdf/planning/plans/Goals-Policies-and-Programs.pdf?utm_source.

11 City of Oxnard. *Draft Background Report City of Oxnard General Plan*.

Site is similarly located within an area that is developed or planned for urban uses and is not designated or utilized as a locally important mineral resource recovery site.

The Project proposes to place new development in areas designated as MRZ-2 and MRZ-3 within the Project Site. However, with the development of the high school in the central portion of the Project Site, the existing land uses within the Project Site are not compatible with mineral resource extraction. The General Plan contains policies intended to minimize the location of incompatible land uses within the vicinity of each other and regulate mineral resource extraction activities. The Environmental Resources and Community Development chapters contain policies that strive to protect mineral resource areas by avoiding placing incompatible development within MRZ-2 and MRZ-3 areas prior to extraction of the available resources, resulting in less than significant impacts related to the development within MRZs that are planned for development.[12] However, the Project Site and surrounding uses are incompatible with mining operations because a school is located on the Project Site and residential, school, and open space uses are adjacent to the Project Site.

As shown in **Figure 4.12-2**, the Project Site is located within the Oxnard Oil Field. However, there are no active oil or gas wells within or immediately adjacent to the Project Site.[13] Therefore, the proposed Sub-Neighborhood Plan would not result in the loss of availability of a locally important mineral resource recovery site delineated in the 2030 General Plan, Specific Plan, or other land use plan, resulting in less than significant impacts.

4.12.6 Cumulative Impacts

As discussed above, the City's General Plan EIR finds that development of MRZ-2 and MRZ-3 areas within the City, including the Project Site, would have less than significant impacts on mineral resources because it would not affect additional mineral resource zones beyond those already planned for development, and policies allow remaining compatible sites to continue mining uses. Therefore, no significant cumulative impacts would result.

The proposed Project would facilitate the development of the portions of the site identified as MRZ-2 and MRZ-3. However, the Project Site and surrounding areas are developed and incompatible with mineral resource extraction. Additionally, there are no active oil or gas wells within or adjacent to the Project Site. Therefore, the proposed Project would not have significant cumulative impacts regarding mineral resources.

4.12.7 Level of Significance without Mitigation

Impacts would be less than significant without mitigation.

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12 City of Oxnard. *2030 General Plan Goals and Policies*.

13 DOC. "WellFinder–CalGEM GIS Powered by WellSTAR."

4.12.8 Mitigation Measures

No mitigation measures are required.

4.12.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

4.13 NOISE

This section evaluates the potential for the proposed Project to result in significant noise and vibration impacts within the Project Site and surrounding area. As discussed in the Initial Study (**Appendix A**), impacts associated with the following threshold were determined to be less than significant: c) airstrip or airport land use plan. Therefore, further detailed evaluation is not provided for this topic because the Project would not create significant impacts in this area.

This evaluation uses procedures and methodologies as specified by the California Department of Transportation (Caltrans), the Federal Transit Administration (FTA), and the Federal Highway Administration (FHWA). Existing noise monitoring, roadway, construction noise, construction vibration, and operational modeling data sheets are included in Noise Study (**Appendix O**) prepared for the proposed Sub-Neighborhood Plan by Meridian Consultants.

4.13.1 Background

Overview of Noise and Vibration

Noise levels are measured using a variety of scientific metrics. As a result of extensive research into the characteristics of noise and human response, standard noise descriptors have been developed for noise exposure analyses. All noise levels provided in this analysis are for outdoor conditions, unless otherwise stated specifically to be interior noise levels.

A-Weighted Sound Pressure Level (dB[A]): The decibel (dB) is a unit used to describe sound pressure level. When expressed in dB(A), the sound has been filtered to reduce the effect of very low and very high frequency sounds, much as the human ear filters sound frequencies. Without this filtering, calculated and measured sound levels would include events that the human ear cannot hear (e.g., dog whistles and low-frequency sounds, such as the groaning sounds emanating from large buildings with changes in temperature and wind). With A-weighting, calculations and sound-monitoring equipment approximate the sensitivity of the human ear to sounds of different frequencies.

Maximum Noise Level (Lmax): Lmax is the maximum or peak sound level during a noise event. The metric accounts only for the instantaneous peak intensity of the sound, and not for the duration of the event. As a vehicle passes by an observer, the sound level increases to a maximum level and then decreases. Some sound level meters measure and record the maximum or Lmax level.

Sound Exposure Level (SEL): SEL, expressed in dB(A), is a time-integrated measure, expressed in decibels, of the sound energy of a single noise event at a reference duration of 1 second. The sound level is integrated over the period that the level exceeds a threshold. Therefore, SEL accounts for both the maximum sound level and the duration of the sound. The standardization of discrete noise events

into a 1-second duration allows calculation of the cumulative noise exposure of a series of noise events that occur over a period of time.

Equivalent Continuous Noise Level (Leq): Leq is the sound level, expressed in dB(A), of a steady sound that has the same A-weighted sound energy as the time-varying sound over the averaging period. Unlike SEL, Leq is the average sound level for a specified time period (e.g., 24 hours, 8 hours, 1 hour). Leq is calculated by integrating the sound energy from all noise events over a given time period and applying a factor for the number of events. Leq can be expressed for any time interval; for example, the Leq representing an averaged level over an 8-hour period would be expressed as Leq(8).

Community Noise Equivalent Level (CNEL): CNEL, expressed in dB(A), is the standard metric used in California to represent cumulative noise exposure. The metric provides a single-number description of the sound energy to which a person or community is exposed over a period of 24 hours similar to day-night average sound level (DNL). CNEL includes penalties applied to noise events occurring after 7:00 PM and before 7:00 AM, when noise is considered more intrusive. The penalized time period is further subdivided into an evening period (7:00 PM through 10:00 PM) with an addition of 5 dB(A) to measured noise levels and a nighttime period (10:00 PM to 7:00 AM) with an addition of 10 dB to measured noise levels. The evening weighting is the only difference between CNEL and DNL.

Groundborne Noise

Groundborne noise refers to noise generated by groundborne vibration. More specifically, groundborne noise is the low-frequency rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.[1] The relationship between groundborne vibration (discussed directly below) and groundborne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise levels that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 dB lower than the velocity level. For groundborne vibration that causes high-frequency noise (i.e., the vibration spectrum peak is greater than 60 Hz), the groundborne noise level will be approximately 20 dB lower than the velocity level.[2] Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

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1 Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*. September 2018. p. 112. Accessed August 2024. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

2 United States Department of Transportation. *FHWA Roadway Construction Noise Model Final Report*. January 2006. Accessed August 2024. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf.

Groundborne Vibration

Groundborne vibration is the perceptible movement of building floors, rattling windows, and doors, shaking of items on shelves or walls, and rumbling sounds. The root mean square (RMS) amplitude of a motion over a 1-second period is commonly used to predict human response to vibration. The motion due to groundborne vibration is described in vibration velocity levels, measured in decibels referenced to 1 microinch per second, and expressed as vibration decibels (VdB). Groundborne vibration is not a common environmental problem, unlike roadway noise or transit noise. The vibration source levels for various types of construction equipment would be based on data provided in Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Manual*.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

Effects of Noise on Humans

Human response to sound is highly individualized. Annoyance is the most common issue associated with community noise levels. Many factors influence the response to noise including the character of the noise, the variability of the sound level, duration, and the time of day of the occurrence.[3] Additionally, non-acoustical factors, such as individual opinion of the noise source, the ability to adapt to the noise, the attitude towards the source and those associated with it, and the predictability of the noise, all influence the response to noise.[4] These factors result in the reaction to noise being highly subjective, with the perceived effect of a particular noise varying widely among individuals in a community. The effects of noise can be grouped into three general categories, subjective effects, such as annoyance and nuisance; interference with activities such as conversation and sleep; and physiological effects, for example, stress or hearing loss.[5]

Noise-induced hearing loss usually takes years to develop. Hearing loss is one of the most obvious and easily quantifiable effects of excessive exposure to noise. While the loss can be gradual and occur over time, it can also be traumatic and occur due to sudden exposure to high noise levels. When combined with hearing loss associated with aging, the amount of hearing loss directly due to

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3 California Department of Transportation. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. September 2013. Accessed August 2024. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf.

4 California Department of Transportation. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*.

5 California Department of Transportation. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*.

the environment is difficult to quantify. Although the major cause of noise induced hearing loss is occupational, nonoccupational sources may also be a factor.[6]

Noise can mask important sounds and disrupt communication between individuals in a variety of settings. This process can cause anything from a slight irritation to a serious safety hazard, depending on the circumstance. Noise can disrupt face-to-face communication and telephone communication, and the enjoyment of music and television in the home. Interference with communication has proved to be one of the most important components of noise-related annoyance.[7]

Noise-induced sleep interference is one of the critical components of community annoyance. Sound level, frequency distribution, duration, repetition, and variability can make it difficult to fall asleep and may cause momentary shifts in the natural sleep pattern or level of sleep. It can produce short-term effects, with the possibility of more serious effects on health if it continues over long periods.

Annoyance can be defined as the expression of negative feelings resulting from interference with activities, as well as the disruption of one's peace of mind or the enjoyment of one's environment. The consequences of noise-induced annoyance are privately held dissatisfaction, publicly expressed complaints to authorities, and potential adverse health effects, as discussed previously.

Some common sounds on the dB(A) scale, relative to ordinary conversation, are provided in **Table 4.13-1: Common Sounds on the A-Weighted Decibel Scale**. As shown, the relative perceived loudness of sound doubles for each increase of 10 dB(A), although a 10 dB(A) change corresponds to a factor of 10 in relative sound energy. Generally, sounds with differences of 3 dB(A) or less are not perceived to be noticeably different by most listeners.

TABLE 4.13-1: COMMON SOUNDS ON THE A-WEIGHTED DECIBEL SCALE

Sound	Sound Level (dB[A])	Subjective Evaluations
Near Jet Engine	140	Deafening
Threshold of Pain	130	
Rock music, with amplifier	120	
Thunder, snowmobile (operator)	110	Very Loud
Boiler shop, power mower	100	
Orchestral crescendo at 25 feet, noisy kitchen	90	
Busy street	80	Loud
Interior of department store	70	

6 California Department of Transportation. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*.

7 Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*.

TABLE 4.13-1: COMMON SOUNDS ON THE A-WEIGHTED DECIBEL SCALE		
Sound	**Sound Level (dB[A])**	**Subjective Evaluations**
Ordinary conversation, 3 feet away	60	Moderate
Quiet automobiles at low speed	50	
Average office	40	Faint
City residence	30	
Quiet country residence	20	Very Faint
Rustle of leaves	10	
Threshold of hearing	0	

Notes:
[1] *Continuous exposure above 85 dB is likely to degrade the hearing of most people (hearing protection recommended).*
[2] *Range of Speech: 50 – 70 dB*

Source: U.S. Department of Housing and Urban Development. *Aircraft Noise Impact – Planning Guidelines for Local Agencies*. 1972.

4.13.2 Existing Conditions

The main sources of noise within the City of Oxnard (City) consist of vehicular traffic along the Ventura Freeway, other major roadways, the Oxnard Airport, the Union Pacific Railroad line, and a variety of stationary noise sources. The highest noise levels are adjacent to the Ventura Freeway. Noise levels that would affect noise sensitive land uses such as residences, schools, and hospitals also occur along major arterials including Victoria Avenue, Channel Islands Boulevard, Ventura Road, and Oxnard Boulevard.[8]

Ambient Noise Levels

Short-term sound monitoring was conducted by Meridian Consultants on September 24, 2024, at seven locations within and around the Project Site between the hours of 9:12 AM and 11:35 AM, to measure the ambient sound environment within the Project vicinity. **Table 4.13-2: Ambient Noise Measurements**. **Figure 4.13-1: Noise Monitoring Locations** identifies the locations where ambient noise measurements were conducted. Noise-level monitoring was conducted for 15-minute intervals at each location using a Larson Davis Model 831 sound-level meter. This meter satisfies the American National Standards Institute (ANSI) standard for general environmental noise measurement instrumentation. The ANSI specifies several types of sound-level meters according to their precision. Types 1, 2, and 3 are referred to as "precision," "general-purpose," and "survey" meters, respectively. Most measurements carefully taken with a Type 1 sound-level meter will have a margin of error not exceeding 1 dB.

8 City of Oxnard. *Draft Background Report City of Oxnard General Plan*. April 2006. Accessed January 2025. https://www.oxnard.gov/wp-content/uploads/OxnardDraftBackgroundReport2006_04.21.06.pdf.

The Larson Davis Model 831 is a Type 1 precision sound-level meter. This meter meets all requirements of ANSI S1.4-1983 and ANSI1.43-1997 Type 1 standards, as well as International Electrotechnical Commission (IEC) IEC61672-1 Ed. 1.0, IEC60651 Ed 1.2, and IEC60804 Type 1, Group X standards.

The sound-level meter was located approximately 5 feet above ground and was covered with a Larson Davis windscreen. The sound-level meter was field calibrated with an external calibrator prior to operation.

TABLE 4.13-2: AMBIENT NOISE MEASUREMENTS

	Location Number/Description	Nearest Use	Time Period	dB(A) Leq 15-minute
1	**Northeast border of Project Site at intersection of Gibraltar Street and Milagro Place**	Single-family residential uses, school uses	10:22 AM – 10:37 AM	55.8
2	**Southeast border of Project Site between Del Sol High School and Festivo Street**	Single-family residential uses, school uses	9:33 AM – 9:48 AM	61.2
3	**South of Project Site across Camino Del Sol**	Multifamily residential uses, school uses	9:12 AM – 9:27 AM	66.5
4	**West of Project Site across N Rose Avenue along Valentia Drive**	Single-family residential uses	11:20 AM – 11:35 AM	66.1
5	**West of Project Site across N Rose Avenue along Vivian Drive**	Single-family residential uses	11:01 AM – 11:16 AM	68.9
6	**North of Project Site at intersection of Cesar Chavez Drive and Prado Way**	Single-family residential uses	10:40 AM – 10:55 AM	64.1
7	**Middle of Project Site along unnamed road**	School uses	9:51 AM – 10:06 AM	55.0

Source: Meridian. *Noise Study.* **Appendix O.**
Notes: dB(A) = A-weighted decibels; Leq = average equivalent sound level.

Roadway Noise Levels

In addition to the ambient noise measurements near the Project Site, the existing traffic noise on local roadways in the surrounding areas was calculated to quantify the daytime and nighttime noise levels using information provided in the transportation impact analysis.[9] The transportation impact analysis analyzed four segments within the Project vicinity. Traffic noise levels were calculated using the FHWA Traffic Noise Model (TNM).

9 Fehr & Peers. *Maulhardt Stiles Sub-Neighborhood Plan Project*. See **Appendix R**.



SOURCE: Google Earth - 2025.

FIGURE **4.13-1**

Meridian Consultants

Noise Monitoring Locations

408-001-24

Table 4.13-3: Existing Roadway Noise Levels provides the 24-hour CNEL noise levels calculated for roadway segments based on existing traffic volumes (refer to **Appendix O** for the Noise Study). The 24-hour CNEL levels attributed to roadway traffic range from a low of 56.0 dB(A) CNEL along Cesar Chavez Drive east of Rose Avenue to a high of 69.6 dB(A) CNEL along Oxnard Boulevard south of Vineyard Avenue. In terms of the City's land use compatibility categories based on roadway traffic only, all locations are classified as normally acceptable or conditionally acceptable.

TABLE 4.13-3: EXISTING ROADWAY NOISE LEVELS

Intersection Number	Roadway Segment	Adjacent Land Use(s)	Existing Roadway Noise Level dB(A) CNEL	Existing Noise Exposure Compatibility Category
Camino Del Sol				
1	East of Rose Avenue	Single Family Residential	61.7	Conditionally Acceptable
1	West of Rose Avenue	Single Family Residential	61.5	Conditionally Acceptable
7	East of Rice Avenue	Industrial	61.2	Normally Acceptable
7	West of Rice Avenue	Industrial	66.8	Normally Acceptable
Cesar Chavez Drive				
2	East of Rose Avenue	Single Family Residential	56.0	Conditionally Acceptable
2	West of Rose Avenue	Single Family Residential	60.7	Conditionally Acceptable
Gonzalez Road				
3	East of Rose Avenue	Single Family Residential/ Commercial	67.8	Conditionally Acceptable
3	West of Rose Avenue	Single Family Residential	69.0	Conditionally Acceptable
6	West of Rice Avenue	Commercial/ Industrial	66.2	Normally Acceptable
15	East of Oxnard Boulevard	Single Family Residential/ School	68.9	Conditionally Acceptable
15	West of Oxnard Boulevard	Single Family Residential/ Commercial	66.6	Conditionally Acceptable
US-101 SB Off Ramp				
4	East of Rose Avenue	Commercial	59.5	Normally Acceptable
4	West of Rose Avenue	Commercial	66.3	Normally Acceptable
8	East of Rice Avenue	Commercial	62.9	Normally Acceptable
8	West of Rice Avenue	Commercial/ Industrial	66.7	Normally Acceptable
Auto Center Drive/US-101 NB Off Ramp				
5	East of Rose Avenue	Commercial/ Industrial	62.8	Normally Acceptable
5	West of Rose Avenue	Commercial	58.6	Normally Acceptable

TABLE 4.13-3: EXISTING ROADWAY NOISE LEVELS				
Intersection Number	Roadway Segment	Adjacent Land Use(s)	Existing Roadway Noise Level dB(A) CNEL	Existing Noise Exposure Compatibility Category
9	East of Santa Clara Avenue	Commercial	64.6	Normally Acceptable
9	West of Santa Clara Avenue	Commercial/ Industrial	68.3	Normally Acceptable
5th Street				
10	East of Rice Avenue	Industrial/ Agricultural	65.5	Normally Acceptable
10	West of Rice Avenue	Commercial/ Industrial	64.7	Normally Acceptable
11	East of Rose Avenue	Industrial/ Agricultural	64.7	Normally Acceptable
11	West of Rose Avenue	Commercial/ Industrial	65.2	Normally Acceptable
14	East of Oxnard Boulevard	Commercial	63.5	Normally Acceptable
14	West of Oxnard Boulevard	Commercial	62.5	Normally Acceptable
Wooley Road				
12	East of Rose Avenue	Agricultural	59.5	Normally Acceptable
12	West of Rose Avenue	Industrial	62.7	Normally Acceptable
13	East of Saviers Road	Commercial/ Multifamily Residential	65.4	Conditionally Acceptable
13	West of Saviers Road	Commercial	64.9	Normally Acceptable
Vineyard Avenue				
16	East of Oxnard Boulevard	Multifamily Residential	66.1	Normally Acceptable
16	West of Oxnard Boulevard	Commercial	66.9	Normally Acceptable
Rice Avenue				
6	North of Gonzalez Road	Commercial	69.7	Conditionally Acceptable
6	South of Gonzalez Road	Industrial	68.7	Normally Acceptable
7	North of Camino Del Sol	Industrial	68.4	Normally Acceptable
7	South of Camino Del Sol	Industrial	67.9	Normally Acceptable
8	North of US-101 SB Off Ramp	Industrial	67.2	Normally Acceptable
8	South of US-101 SB Off Ramp	Commercial	67.7	Normally Acceptable
Rose Avenue				
1	North of Camino Del Sol	Single-Family Residential	66.2	Conditionally Acceptable
1	South of Camino Del Sol	Multifamily Residential	66.0	Conditionally Acceptable
2	North of Cesar Chavez Drive	Multifamily Residential	66.7	Conditionally Acceptable
2	South of Cesar Chavez Drive	Single-Family Residential	66.5	Conditionally Acceptable

TABLE 4.13-3: EXISTING ROADWAY NOISE LEVELS

Intersection Number	Roadway Segment	Adjacent Land Use(s)	Existing Roadway Noise Level dB(A) CNEL	Existing Noise Exposure Compatibility Category
3	North of Gonzalez Road	Commercial	68.9	Conditionally Acceptable
3	South of Gonzalez Road	Multifamily Residential	68.4	Conditionally Acceptable
4	North of US-101 SB Off Ramp	Commercial	75.2	Conditionally Acceptable
4	South of US-101 SB Off Ramp	Commercial	68.7	Conditionally Acceptable
5	North of US-101 NB Off Ramp	Commercial	74.5	Conditionally Acceptable
5	South of US-101 NB Off Ramp	Commercial	67.9	Conditionally Acceptable
11	North of 5th Street	Single-Family Residential	66.9	Conditionally Acceptable
11	South of 5th Street	Commercial	66.0	Normally Acceptable
Santa Clara Avenue				
9	North of Auto Center Drive/ US-101 NB Off Ramp	Single-Family Residential	64.3	Conditionally Acceptable
9	South of Auto Center Drive/ US-101 NB Off Ramp	Commercial	65.7	Normally Acceptable
Saviers Road				
9	North of Auto Center Drive/ US-101 NB Off Ramp	Single-Family Residential	64.3	Conditionally Acceptable
9	South of Auto Center Drive/ US-101 NB Off Ramp	Commercial	65.7	Normally Acceptable
Oxnard Boulevard				
14	North of 5th Street	Commercial	66.9	Normally Acceptable
14	South of 5th Street	Commercial	66.7	Normally Acceptable
15	North of Gonzalez Road	Single-Family Residential	69.2	Conditionally Acceptable
15	South of Gonzalez Road	Multifamily Residential	68.7	Conditionally Acceptable
16	North of Vineyard Avenue	Multifamily Residential	67.6	Conditionally Acceptable
16	South of Vineyard Avenue	Multifamily Residential	69.6	Conditionally Acceptable

Source: Meridian Consultants. *Noise Study*. **Appendix O.**

Surrounding Uses

The land uses surrounding the Project Site includes single-family residential uses to the north along Cesar Chavez Drive; single-family residential uses to the east along Ocaso Place, Milagro Place and Festivo Street, East Village Park, and Rio Rosales Elementary School to the east; single-family residential uses across North Rose Avenue, and single-family and multifamily residential uses and commercial uses to the south along Camino Del Sol.

As shown in **Figure 4.13-2: Sensitive Receptor Map**, the sensitive receptors nearest to where Project construction would occur include the single-family residential uses to the north across Cesar Chavez Drive, single-family residential uses to the east along Ocaso Place, Milagro Place, Rio Rosales Elementary School, single-family residential uses across North Rose Avenue, and single-family and multifamily residential uses, to the south along Camino Del Sol.

Ground-borne Vibration

Based on field observations, the primary source of existing ground-borne vibration in the vicinity of the Project Site is vehicle traffic on local roadways. According to the Federal Transit Administration, typical road traffic-induced vibration levels are unlikely to be perceptible by people.[10] Trucks and buses typically generate ground-borne vibration velocity levels of approximately 63 VdB (at a 50-foot distance), and these levels could reach 72 VdB when trucks and buses pass over bumps in the road. A vibration level of 72 VdB is above the 60 VdB level of perceptibility.

4.13.3 Regulatory Framework

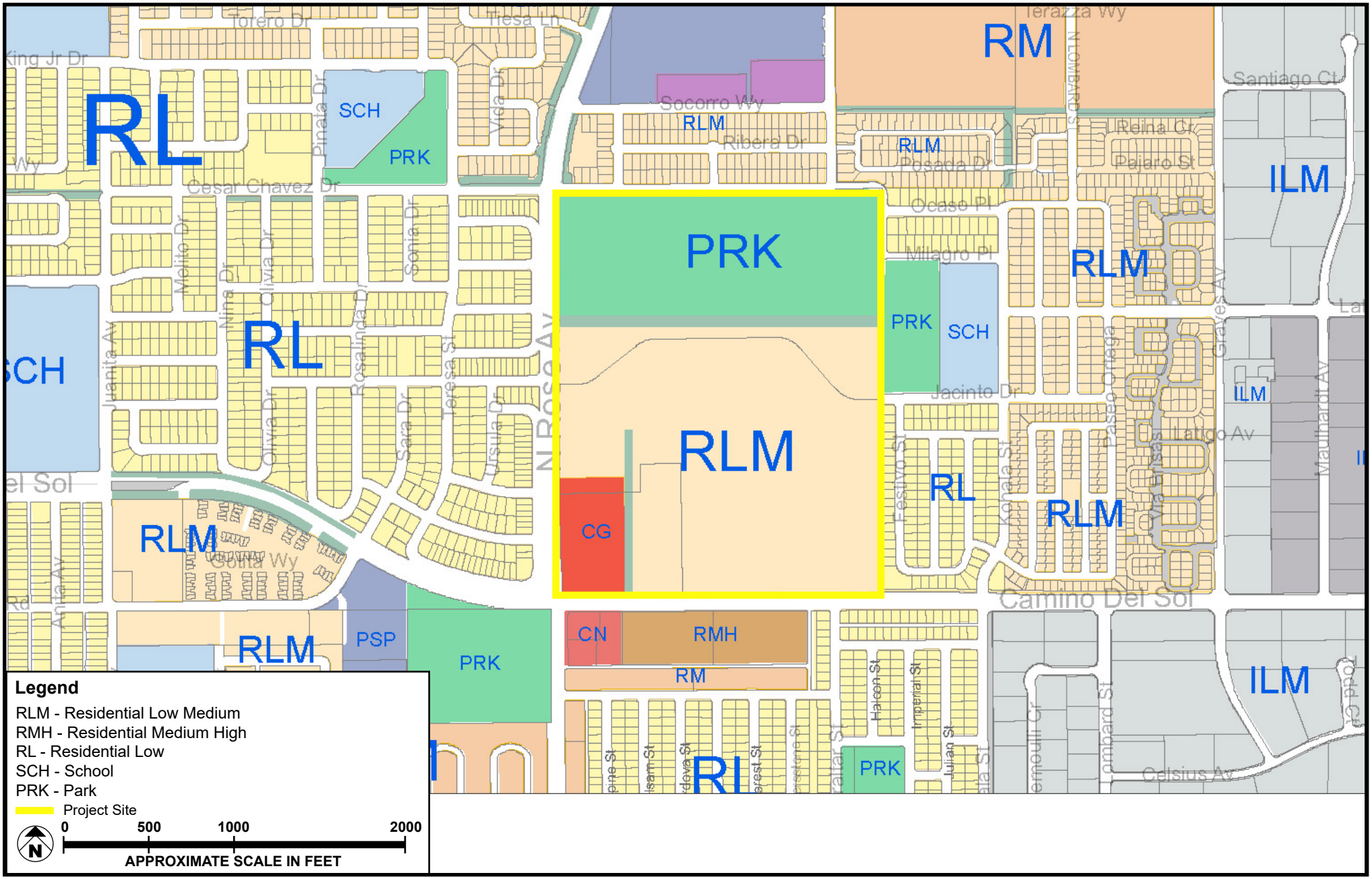
State Regulations

Office of Planning and Research Guidelines for Noise Compatible Land Use

The California Department of Health Services (DHS) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure; these guidelines have been included in the State of California General Plan Guidelines, which is published and updated by the Governor's Office of Planning and Research.[11] According to the State, an exterior noise environment up to 60 dB(A) CNEL and 65 dB(A) CNEL is "normally acceptable" for single- and multifamily residential uses, respectively, without special noise insulation requirements. In addition, noise levels up to 75 dB(A) CNEL are "conditionally acceptable" with special noise insulation requirements, while noise levels at 75 dB(A) CNEL and above are "clearly unacceptable" for residential uses.

10 Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*.

11 State of California, Governor's Office of Planning and Research. *General Plan Guidelines*. 2017. Page 374. Accessed January 2024. http://opr.ca.gov/planning/general-plan/guidelines.html.



SOURCE: Google Earth – 2024

FIGURE **4.13-2**

Meridian Consultants

Sensitive Receptor Map

408-001-24

In addition, Section 65302(f) of the California Government Code requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must (1) identify and appraise noise problems in the community, (2) recognize Office of Noise Control guidelines, and (3) analyze and quantify current and projected noise levels.

The DHS Office of Noise Control has developed guidelines to provide communities with noise environments deemed to be generally acceptable for different land uses. These guidelines serve as a primary tool for a city to use to assess the compatibility between land uses and outdoor noise. Noise exposure for single-family uses is normally acceptable when the CNEL at exterior residential locations is equal to or below 60 dB(A), conditionally acceptable when the CNEL is between 55 to 70 dB(A), and normally unacceptable when the CNEL exceeds 70 dB(A). Some overlap exists between categories. These guidelines apply to noise sources such as vehicular traffic, aircraft, and rail movements.

State of California Building Code

California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, California Building Code. These noise standards are applied to new construction in California for the purpose of interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dB(A) CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dB(A) CNEL.

California Noise Insulation Standards

The California Noise Insulation Standards[12] require that interior noise levels from exterior sources be 45 dB(A) or less in any habitable room of a multi-residential use facility (e.g., hotels, motels, dormitories, long-term care facilities, and apartment houses, except detached single-family dwellings) with doors and windows closed. Measurements are based on CNEL or Ldn (the day–night average), whichever is consistent with the noise element of the local general plan. Where exterior noise levels exceed 60 dB(A) CNEL, an acoustical analysis for new development may be required to show that the proposed construction will reduce interior noise levels to 45 dB(A) CNEL. If the interior 45 dB(A) CNEL limit can be achieved only with the windows closed, the residence must include mechanical ventilation that meets applicable Uniform Building Code (UBC) requirements.

12 California Code of Regulations. Title 24, Section 3501 et seq.

Public Resources Code Section 21085 (Assembly Bill 1307)

Assembly Bill (AB) 1307 was signed by Governor Newsom in September 2023. For residential projects, noise generated by occupants is not a significant effect on the environment under the California Environmental Quality Act.

Caltrans Vibration Standards

The City's California Environmental Quality Act (CEQA) Threshold Guide utilizes the Caltrans Transportation and Construction Vibration Guidance Manual[13] to determine potential impacts to land uses from vibration from construction activities. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration. The construction vibration criteria include consideration of the building condition. The vibration damage criteria is shown in **Table 4.13-4: Construction Vibration Damage Criteria**. Potential human annoyance associated with vibration is usually different if it is generated by a steady-state or transient vibration source. The vibration level at which transient vibration sources including construction equipment, are considered to be distinctly perceptible is 0.24 inches per second (ips) peak particle velocity (PPV).

TABLE 4.13-4: CONSTRUCTION VIBRATION DAMAGE CRITERIA

PPV (in/sec)	Effect on Buildings
0.4–0.6	Architectural damage and possible minor structural damage
0.2	Threshold at which there is a risk of architectural damage to normal dwelling houses (houses with plastered walls and ceilings)
0.1	Virtually no risk of architectural damage to normal buildings
0.08	Recommended upper limit of vibration to which ruins and ancient monuments should be subjected
0.006–0.019	Vibration unlikely to cause damage of any type

Source: Caltrans, Transportation and Construction Vibration Guidance Manual. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf. Accessed November 2025.

Local Regulations

City of Oxnard Safety & Hazards Element

The City of Oxnard's General Plan Safety and Hazards Element includes the following noise policies applicable to construction and operational noise:[14]

Goal CD-4: Commercial uses compatible with surrounding land uses to meet the present and future needs of Oxnard residents, employees, and visitors.

13 Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*.

14 City of Oxnard. *2030 General Plan Goals and Policies*. Adopted October 2011, includes amendments through December 2022. Accessed August 2024. https://www.oxnard.gov/wp-content/uploads/Oxnard-2030-General-Plan-Amend-12.2022-SMc.pdf.

Policy CD-4.1: ***Mitigate Land Use Conflicts.***

Mitigate conflicts between commercial and other land uses, especially residential and recreational uses.

Goal CD-5: Development of industrial uses in appropriate areas, assistance in the location of new industry, retention and expansion of existing industry, and maintenance of the City's economic vitality.

Policy CD-5.1: ***Industrial Clustering.***

Encourage the clustering of industrial uses into areas that have common needs and are compatible in order to maximize their efficiency.

Policy CD-5.2: ***Compatible Land Use.***

Ensure adequate separation between sensitive land uses (residential, educational, open space, healthcare) to minimize land use incompatibility associated with noise, odors, and air pollutant emissions.

Policy CD-5.4: ***Environmentally Friendly and "Green" Industry.***

Seek to attract industrial development that avoids or minimizes substantial pollution, noise, glare, odor, use of hazardous materials, or other offensive activity and/or is a component of the emerging Green industry.

Goal CD-8: Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.

Policy CD-8.5: ***Impact Mitigation.***

Ensure that new development avoids or mitigates impacts on air quality, traffic congestion, noise, and environmental resources to the maximum extent feasible.

Goal ICS-10: Improved and safe commercial air carrier services.

Policy ICS-10.2: ***Oxnard Airport Compatible Land Use.***

Continue to ensure that the land use and zoning adjacent to Oxnard Airport is compatible in order to minimize potential noise and safety problems.

Goal ER-6: Protected and enhanced natural setting and scenic resources.

Policy ER-6.6: ***New Development Private Open Space.***

Ensure that new development incorporates open space areas

that provide community and neighborhood identity, private quality exterior private open space for each housing unit, and minimize conflicting land uses and noise generators.

Goal SH-5: A quiet and safe residential and working environment in terms of exposure to and/or generation of noise.

Policy SH-5.1: ***Noise Abatement Programs.***

Promote intergovernmental noise abatement coordination and public information programs.

Policy SH-5.2: ***State Noise Insulation Standards.***

Continue to enforce State Noise Insulation Standards for projects in high noise environments and require developers to comply with noise mitigation measures, designed by an acoustical engineer.

Policy SH-5.3: ***Sound Attenuation Measures.***

Promote, where feasible, alternative sound attenuation measures such as berms, heavy landscaping, resurfacing of noise walls to promote noise absorption as well as deflection, berms and landscaping, or location of buildings away from the roadway or other noise sources.

Policy SH-5.4: ***Older Neighborhood Noise Mitigation.***

Develop a noise research and mitigation program for any area where traffic-generated noise is significant and exceeds or is likely to exceed acceptable thresholds.

Policy SH-5.6: ***Compatibility with Oxnard Airport.***

Work with the Oxnard Airport in revising flight paths to minimize flyovers of residential areas, especially "touch and go" pattern flying at low altitude and at relatively high frequency.

Policy SH-5.7: ***Monitor Vehicular Exhaust Noise.***

Enforce laws that would require correction of exhaust equipment that generates noise in excess of the noise ordinance and/or is modified in violation of applicable State or local air quality or noise regulations.

Goal SH-6: Consideration of noise levels and impacts in the land use planning and development process.

Policy SH-6.1: ***Construction Noise Control.***

Provide best practices guidelines to developers for reducing potential noise impacts on surrounding land uses

Policy SH-6.2: ***Limiting Construction Activities.***

Continue to limit construction activities to the hours of 7 am to 7 pm, Monday through Saturday. No construction shall occur after hours, on Sundays, or national holidays without permission from the City.

Policy SH-6.3: ***Buffering of Sensitive Receptors.***

Require noise buffering and/or other construction treatments in development located near major streets, highways, the airport, railroad tracks, or other significant noise sources as recommended by a noise analysis.

Policy SH-6.4: ***New Development Noise Compatibility.***

Require that proposed development projects not generate more noise than that classified as "satisfactory" based on CEQA Thresholds of significance on nearby property.

City of Oxnard General Plan Background Report

Specific numerical noise criteria are not included in the 2030 General Plan but are referenced in the General Plan Background Report.[15] **Table 4.13-5: Community Noise Exposure Ldn or CNEL, DB** presents criteria used to assess the compatibility of proposed land uses with the noise environment. The proposed Project includes the potential for development of up to 950 residential dwelling units and up to 40,000 square feet of commercial uses. As shown, normally acceptable noise levels for residential single-family uses are 60 dB(A) CNEL or less and normally acceptable noise levels for commercial uses are 70 dB(A) CNEL or less.

Pursuant to the City's Zoning Code Section 16-420J(F)(2), developers of individual projects within the Sub-Neighborhood Plan Area will be required to submit evidence to the satisfaction of the Director that all units with patios and/or balconies meet the 65 dB(A) CNEL.

TABLE 4.13-5: COMMUNITY NOISE EXPOSURE LDN OR CNEL, dB

Land Use Category	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density, Single-Family, Duplex, Mobile Homes	<60	55–70	70–75	>80

15 City of Oxnard. *Draft Background Report City of Oxnard General Plan*.

TABLE 4.13-5: COMMUNITY NOISE EXPOSURE LDN OR CNEL, dB				
Land Use Category	**Normally Acceptable**	**Conditionally Acceptable**	**Normally Unacceptable**	**Clearly Unacceptable**
Residential – Multifamily	<65	60–70	70–75	>75
Transient Loding – Motels, Hotels	<65	60–70	70–80	>80
Schools, Libraries, Churches, Hospitals, Nursing Homes	<70	60–70	70–80	>80
Auditoriums, Concert Halls, Amphitheaters	N/A	<70	N/A	>65
Sports Arena, Outdoor Spectator Sports	N/A	<75	N/A	>70
Playgrounds, Neighborhood Parks	<70	67.5–75	N/A	>72.5
Golf Courses, Riding Stables, Water Recreation, Cemeteries	<75	70–80	70–80	>80
Office Buildings, Business Commercial and Professional	<70	67.5–77.5	>75	N/A
Industrial, Manufacturing Utilities, Agriculture	<75	70–80	>75	N/A

Note:
Normally Acceptable *– Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal convention construction, without any special noise insulation requirements.*
Conditionally Acceptable *– New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design – Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice*
Normally Unacceptable *– New construction or development should generally be discouraged – If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*
Clearly Unacceptable *– New construction or development should generally not be undertaken.*
NA *– Not applicable.*

Source: City of Oxnard, *Draft Background Report* (2006).

City of Oxnard Municipal Code

Specific numerical noise criteria are not included in the 2030 General Plan but are referenced in the General Plan Background Report.[16] As shown above in **Table 4.13-5** for multifamily residential and other sensitive uses, the maximum normally acceptable CNEL considered compatible is 65 dB(A) and for single-family residential the maximum normally acceptable CNEL is 60 dB(A).

Additionally, operational activities are subject to the City Noise Ordinance and the exterior noise limits set forth in the City's Municipal Code Section 7-185. **Table 4.13-6: Exterior Sound Standards** show the allowable exterior sound level for the residential uses surrounding the Project Site.

16 City of Oxnard. *Draft Background Report City of Oxnard General Plan*.

TABLE 4.13-6: EXTERIOR SOUND STANDARDS			
Sound Zone	Type of Land Use	Allowable Exterior Sound Level	
		7:00 AM to 10:00 PM	10:00 PM to 7:00 AM
I	Residential	55	50
II	Commercial	65	60
III	Industrial	70	70

Source: City of Oxnard, Municipal Code, Section 7-185.

4.13.4 Significance Thresholds

a. Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the Oxnard 2030 General Plan or noise ordinance, or applicable standards of other agencies?

Based on local noise criteria established by the City and guidelines available from the FTA, the following would be considered significant:

- If construction activities occur outside the normal business hours of 7:00 AM and 7:00 PM Monday through Saturday.
- If construction activities resulting in noise levels exceeding 80 dB(A) (Leq-8hour) during the daytime and 70 dB(A) (Leq-8hour) during the nighttime period for residential uses and 85 dB(A) (Leq-8hour) during both the daytime and nighttime periods for commercial uses and 90 dB(A) (Leq-8hour) during both the daytime and nighttime periods for industrial uses.

a. Would the project generate or expose persons to excessive groundborne vibration or groundborne noise levels?

Based on vibration criteria established by the City and guidelines from the Caltrans Transportation and Construction Vibration Guidance Manual, the following would be considered significant:

- Construction equipment would provide ground-borne vibration levels to exceed the 0.4 ips PPV building damage threshold for residential buildings and the 0.24 ips PPV threshold for human annoyance

4.13.5 Methodology

Construction Noise

Construction is anticipated to occur over approximately 68 months beginning in January 2027 through September 2032. Construction activities for Area A would include grading, which would occur over nine months, building construction, which would occur over approximately 51 months, and paving and architectural coating (painting) which would occur concurrently for 4 and 10 months respectively. Construction activities for Area C would include demolition of the existing buildings and site improvements, which would occur over approximately 1 month, grading, which would occur over 3 months, building construction which would occur over approximately 14 months, and paving and

architectural coating (painting) which would occur concurrently for one and four months, respectively. A variety of construction equipment would be used including but not limited to tractors, loaders, backhoes, trenchers, cement and mortar mixers, cranes, excavator, scrapers sweepers, dozers, and forklifts.

Construction activities typically generate noise from the operation of a variety of equipment types. Noise impacts from on-site construction activities were evaluated by determining the noise levels generated by different types of construction activity and calculating the construction-related noise level at nearby noise-sensitive receptor locations. The actual noise level would vary, depending upon the type of construction equipment, model, the type of work activity being performed, and the condition of the equipment.

To calculate construction noise levels, hourly activity, or utilization factors (i.e., the percentage of normal construction activity that would occur, or construction equipment that would be active, during each hour of the day) are estimated based on the temporal characteristics of other previous and current construction projects. The hourly activity factors express the percentage of time that construction activities would emit average noise levels. Typical noise levels for each type of construction equipment were obtained from the FHWA Roadway Construction Noise Model. [17]

An inventory of construction equipment, including the number and types of equipment, which would be operating simultaneously on the Project Site is shown in **Table 4.13-7: Construction Equipment By Phase** (refer to **Appendix O** for the Noise Study)**.** It is unlikely that all pieces of construction equipment identified in **Table 4.13-7** would operate simultaneously in any single location during construction because equipment is generally operated only when needed and space constraints limit the equipment that can be used at any one time in a specific location.

TABLE 4.13-7: CONSTRUCTION EQUIPMENT BY PHASE

Construction Phase	Equipment Type	Quantity	Usage Hours (per day)	Noise Level at 50 feet (L_{max})
Area A				
Grading	Graders	1	8	85
	Excavators	2	8	85
	Tractors/Loaders/Backhoes	2	8	84
	Scrapers	2	8	85
	Rubber Tired Dozers	1	8	85
Building Construction	Forklifts	3	8	80
	Generator Sets	1	8	82

17 United States Department of Transportation. *FHWA Roadway Construction Noise Model Final Report*. January 2006. Accessed January 2024. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf.

TABLE 4.13-7: CONSTRUCTION EQUIPMENT BY PHASE				
Construction Phase	Equipment Type	Quantity	Usage Hours (per day)	Noise Level at 50 feet (L_{max})
	Cranes	1	7	85
	Welders	1	8	73
	Tractors/Loaders/Backhoes	3	7	84
	Pavers	2	8	85
Paving	Paving Equipment	2	8	85
	Rollers	2	8	85
Architectural Coating	Air Compressors	1	6	80
Area C				
	Rubber Tired Dozers	2	8	85
Demolition	Excavators	3	8	85
	Concrete/Industrial Saws	1	8	90
	Graders	1	8	85
	Excavators	2	8	85
Grading	Tractors/Loaders/Backhoes	2	8	84
	Scrapers	2	8	85
	Rubber Tired Dozers	1	8	85
	Forklifts	3	8	80
	Generator Sets	1	8	82
Building Construction	Cranes	1	7	85
	Welders	1	8	73
	Tractors/Loaders/Backhoes	3	7	84
	Pavers	2	8	85
Paving	Paving Equipment	2	8	85
	Rollers	2	8	85
Architectural Coating	Air Compressors	1	6	80

Source: FHWA Roadway Construction Noise Model (RCNM) Version 1.1. See also: Meridian Consultants. *Noise Study*. **Appendix O**.

As nearly all of the construction equipment expected to be used is mobile and would move around the site and the analysis evaluates noise occurring over a one-hour period (Leq), the modeling conservatively assumed that all of the construction equipment operating on-site would be located at the location closest to the applicable sensitive receptor. Therefore, this modeling provides a reasonably conservative calculation of the maximum noise levels generated during construction.

Noise levels generated by on-site construction equipment can be reduced via specific noise control measures including the following: (1) muffler requirements; (2) equipment modifications that reduce noise levels; and (3) maintenance and operational requirements. These noise control measures can

be used separately or in combination in order to reduce the noise levels generated by on-site construction equipment.

Construction equipment operates at its noisiest levels for certain percentages of time during operation. As such, equipment would operate at different percentages over the course of an hour.[18] During a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently.

To characterize construction-period noise levels, the (hourly Leq) noise level associated with each construction stage was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage using the roadway construction noise model (RCNM) (refer to **Appendix O** for the Noise Study). These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

Construction Equipment Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

Impacts due to construction activities were evaluated by identifying vibration sources (i.e., construction equipment), measuring the distance between vibration sources and surrounding structure locations, and making a significance determination.

For quantitative construction vibration assessments related to building damage, vibration source levels for construction equipment is taken from the FTA *Transit Noise and Vibration Impact Assessment Manual*. Building damage would be assessed for each piece of equipment individually and assessed in terms of peak particle velocity in inches per second. Human annoyance would be assessed for each piece of equipment individually and assessed in terms of vibration decibels.

The vibration source levels for various types of equipment are based on data provided by the FTA.

Construction Traffic Noise

The analysis of off-site construction traffic noise impacts focuses on: (1) identifying major roadways that may be used for construction worker commute routes or truck haul routes; (2) identifying the nature and location of noise-sensitive receptors along those routes; and (3) evaluating the traffic characteristics along those routes, specifically as related to existing traffic volumes.

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18 Federal Highway Administration. *Traffic Noise Model*. 2006.

Operational Noise

The California Code of Regulations sets forth requirements for the insulation of multiple-family residential dwelling units from excessive and potentially harmful noise. The State indicates that locating units in areas where exterior ambient noise levels exceed 65 dB(A) is undesirable. Whenever such units are to be located in such areas, the developer must incorporate into building design various construction features which reduce interior noise levels to 45 dB(A) CNEL. **Table 4.13-5**, above, presents criteria used to assess the compatibility of proposed land uses with the noise environment. As shown, normally acceptable noise levels for single family residential uses are 60 dB(A) CNEL or less and for multifamily residential uses it is 65 dB(A) CNEL or less.

There is no completely satisfactory way to measure the subjective effects of noise or of the corresponding human reactions of annoyance and dissatisfaction. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment (ambient) to which one has adapted.

In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged. As such, the Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that take into account the ambient noise level. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average daily noise level (i.e., CNEL). FICON identifies a readily perceptible 5 dB(A) or greater project-related noise level increase is considered a significant impact when the noise criteria for a given land use is exceeded. According to FICON, in areas where existing noise levels range from 60 to 65 dB(A), a 3 dB(A) barely perceptible noise level increase appears to be appropriate for most people. When the existing noise levels already exceed 65 dB(A), any increase in community noise louder than 1.5 dB(A) or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance.

4.13.6 Project Impacts

a. Would the project generate or expose persons to noise levels exceeding standards established in the Oxnard 2030 General Plan or Noise Ordinance, or applicable standards of other agencies?

<u>On-Site Construction Equipment</u>

Construction activities that would occur during the different phases of construction (e.g., demolition, grading, building construction, paving) would generate both steady-state and episodic noise that would be heard both on and off the Project Site.

Noise from construction activities would be affected by the amount of construction equipment, the location of this equipment, the timing and duration of construction activities, and the relative distance to noise-sensitive receptors. Construction activities that would occur during the construction phases would generate both steady-state and episodic noise that would be heard both on and off the Project Site. Each construction phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics. The Project would be constructed using typical construction techniques; no blasting or impact pile driving would be required.

Typical maximum noise levels and duty cycles of representative types of equipment that would potentially be used during construction for this Project are presented in **Table 4.13-8: Typical Maximum Noise Levels for Project Construction Equipment**. Construction-equipment noise would not be constant because of the variations of power, cycles, and equipment locations. For maximum noise events, this analysis considers equipment operating at the edge of the property line of the Project Site.

TABLE 4.13-8: TYPICAL MAXIMUM NOISE LEVELS FOR PROJECT CONSTRUCTION EQUIPMENT

Equipment Description	Typical Duty Cycle (%)	Spec Lmax (dB[A])	Actual Lmax (dB[A])
Air Compressor	40	80.0	77.7
Crane	16	85.0	80.6
Concrete Saw	20	90.0	89.6
Dozer	40	85.0	81.7
Generator Sets	50	82.0	80.6
Grader	40	85.0	N/A
Forklift	40	85.0	N/A
Paver	50	85.0	77.2
Roller	20	85.0	80.0
Tractor	40	84.0	N/A
Welder	40	73.0	74.0

Note: N/A = not available.

Source: FHWA RCNM Version 1.1.

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. The construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on-site would operate simultaneously. As mentioned previously, land uses surrounding the Project Site includes single-family residential uses to the north along Cesar Chavez Drive; single-family residential uses to the east along Ocaso Place, Milagro Place and Festivo Street, East Village Park and Rio Rosales Elementary School to the east; single-family residential uses across North Rose Avenue, and single-family and multifamily residential uses and commercial uses

to the south along Camino Del Sol. Given the physical size of the Project Site and logistical limitations, modeling based upon the noise equipment located at the construction area nearest to the affected receptors presents a conservative impact analysis. This is considered a worst-case evaluation because construction of the Project would typically use fewer pieces of equipment simultaneously at any given time as well as operating throughout the construction site (i.e., most of the time construction equipment would be operating at distances further away from the off-site receptors than assumed in the forecasting of Project construction noise levels). As such, Project construction would often generate lower noise levels than reported herein.

Table 4.13-9: Construction Maximum Noise Estimates presents the maximum noise impacts that are forecasted to occur at each of the receptor sites (refer to **Appendix O** for the Noise Study). As shown, average noise levels during construction would result in a maximum increase of 6.6 dB(A) above the 80 dB(A) (Leq-8hr) threshold without the implementation of technically feasible noise reduction measures. However, the noise levels would not exceed 90 dB(A) (Leq-1hour) for the nearby residential uses. Additionally, the 80 dB(A) (Leq-8hr) threshold is conservatively used for Del Sol High School.

TABLE 4.13-9: CONSTRUCTION MAXIMUM NOISE ESTIMATES

Site	Nearest Off-Site Building Structures	Calculated Noise Level (Leq-1hour) by Construction Phase					Significance Threshold	Increase above Significance Threshold
		Demolition	Grading	Building Construction	Paving	Architectural Coating		
Phase 1								
1	**Single-family residential uses along Milagro Place and Gibraltar Street**	—	86.6	85.3	80.0	72.1	80	+6.6
2	**Single-family residential uses along Festivo Street and Del Sol High School**	—	65.7	64.3	59.1	51.1	80	+0.0
3	**Multifamily residential uses along Camino Del Sol**	—	58.3	56.9	51.7	43.8	80	+0.0
4	**Single-family residential uses along Valentina Drive**	—	65.7	64.4	59.1	51.2	80	+0.0
5	**Single-family residential uses along Vivana Drive**	—	75.1	73.8	68.6	60.6	80	+0.0
6	**Single-family residential uses**	—	84.1	82.8	77.5	69.6	80	+4.1

TABLE 4.13-9: CONSTRUCTION MAXIMUM NOISE ESTIMATES

Site	Nearest Off-Site Building Structures	Calculated Noise Level (Leq-1hour) by Construction Phase					Significance Threshold	Increase above Significance Threshold
		Demolition	Grading	Building Construction	Paving	Architectural Coating		
	along Cesar Chavez Drive							
7	**Del Sol High School**	—	68.2	66.9	61.6	53.7	80	+0.0
Phase 2								
1	**Single-family residential uses along Milagro Place and Gibraltar Street**	55.6	56.9	56.0	53.5	42.8	80	+0.0
2	**Single-family residential uses along Festivo Street and Del Sol High School**	58.8	60.2	59.3	56.8	46.1	80	+0.0
3	**Multifamily residential uses along Camino Del Sol**	70.9	72.2	71.3	68.9	58.1	80	+0.0
4	**Single-family residential uses along Valentina Drive**	73.4	74.7	73.8	71.4	60.6	80	+0.0
5	**Single-family residential uses along Vivana Drive**	59.6	61.0	60.0	57.6	46.8	80	+0.0
6	**Single-family residential uses along Cesar Chavez Drive**	55.9	57.3	56.3	53.9	43.1	80	+0.0
7	**Del Sol High School**	80.4	81.8	80.8	78.4	67.7	80	+1.8

Notes: No demolition is taking place during Phase A of construction as the site is vacant and undeveloped.

Source: FHWA, RCNM, Version 1.1. See also: Meridian Consultants. *Noise Study*. **Appendix O.**

In devising construction noise control strategies, important options include controlling the noise at the source. Source control requirements include added benefits in promoting technological advances in the development of quieter equipment. Source control techniques can include: (1) muffler requirements, (2) maintenance and operational requirements, and (3) equipment emission level requirements. These control techniques can be used separately or in combination in order to achieve the desired results. Most noise originates from equipment powered by either gasoline or diesel engines. A large part of the noise emitted is due to the intake and exhaust portions of the engine cycle. A remedy for controlling much of the engine noise is by adhering to **Mitigation Measure**

(MM) NOI-1 which requires the use of optimal muffler systems. **MM NOI-1** would lead to replacement of worn mufflers and to retrofitting where mufflers are not in use. Using optimal muffler systems on all equipment would reduce construction noise levels by 10 dBA or more.[19]

Other effective methods of diminishing the noise impacts associated with individual pieces of construction equipment is to employ less noisy machinery. This is accomplished by specifying the quietest available equipment. Additionally, free standing shields around stationary equipment may achieve reductions of 20 dB(A) at high frequencies and 10 dB(A) in the middle frequency range. This material can be constructed from polyvinyl chloride (PVC) layers, lead-filled fabric, or rubber. These aprons are most useful when equipment only needs partial shielding or has to be regularly moved.

Additionally, limiting the number of noise-generating, heavy-duty construction equipment to two pieces operating simultaneously would reduce construction noise levels by approximately 1.5 dB(A).

With implementation of **MM NOI-1,** construction noise levels resulting in an increase of 6.6 dB(A) (Leq-1hr) above the significance threshold would be reduced by a minimum of 6.6 dB(A) (Leq-1hr). Additionally, the Project would be required to comply with Section 7-188 of Oxnard Municipal Code by ensuring construction activities would occur during the hours 7:00 AM and 6:00 PM on weekdays or Saturdays only. Compliance with the above practices would ensure construction noise levels would be below the significance threshold; thus, with required mitigation, construction noise impacts would be reduced to a less than significant level.

Off-Site Construction Traffic

Construction of the Project would require workers travelling to and from the Project Site to work on the site, export soil, and deliver supplies to the site. Trucks traveling to and from the Project Site would be required to travel along a haul route approved by the City. At the maximum, approximately 100 hauling trips per day would take place during the grading in Phase 1. Haul truck traffic would take the most direct route to the freeway ramp along North Rose Avenue to US Route 101. Hauling of a total of 212,000 cubic yards of import during Phase 1 and 18,000 cubic yards during Phase 2 is proposed.

Noise associated with construction truck trips were estimated using the Caltrans FHWA TNM based on the maximum number of truck trips in a day. Based on traffic counts conducted for the Project, the existing (2025) average daily traffic count on North Rose Avenue is 21,663 vehicles per day. Comparing the maximum number of daily construction-related trips (a total of 697 worker trips and 108 vendor trips during the overlapping building construction phase for both Area A and Area C, and an adjusted Passenger Car Equivalent [PCE] total of 913 trips based on the vendor truck trips generating the equivalent noise of two passenger vehicles) to an average daily traffic volume of

19 United States Department of Transportation, Federal Highway Administration. *Special Report—Measurement, Prediction, and Mitigation, Chapter 4, Mitigation*. June 2017. Accessed August 2025. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

21,663, the additional vehicle trips would amount to a worst-case number of trips due to Project construction. Based on the total number of construction-related Project trips being 913 per day, the predicted existing (2025) plus Project construction trip noise level is approximately 66.2 dB(A) CNEL. As shown in **Table 4.13-3**, existing roadway noise levels at intersection 1, North Rose Avenue north of Camino Del Sol, are 66.2 dB(A) CNEL. Construction trips would not increase roadway noise levels, and the noise level increases from truck trips would be below the construction threshold of 80 dB(A). As such, Project construction traffic noise impacts would not be considered significant.

Operation

Roadway Noise

As discussed in **Section 2.0: Project Description**, the Project Site consists of the existing Del Sol High School on an approximately 50.7-acre portion of the Project Site. Areas A and C consist of vacant, undeveloped land that has been subject to previous disturbance by historic agricultural activities, an existing home, additional residential units, and accessory buildings associated with agricultural use. The proposed Project would allow the development of a residential-mixed use urban village, containing a maximum of 950 residential dwelling units, a maximum of 40,000 square feet of retail and general commercial space, public parks and associated circulation and landscaping.

Table 4.13-10: Existing plus Project Roadway Noise Levels illustrates the change in noise levels from traffic volumes and from traffic generated by the Project (refer to **Appendix O** for the Noise Study). The difference in traffic noise between existing conditions and existing plus Project conditions represents the increase in noise attributable to Project-related traffic. As shown in **Table 4.13-10**, the maximum noise level increase along the analyzed roadways were 0.8 dB(A) CNEL along Cesar Chavez Road east of Rose Avenue. Consequently, Project-related traffic would not cause noise levels along the analyzed roadways to increase by more than 3.0 dB(A). Thus, the proposed Project would not result in a permanent increase in noise levels above ambient levels in the vicinity of the Project Site in excess of the City's Noise Element and Noise Ordinance. Vehicular related noise impacts would not be considered significant.

TABLE 4.13-10: EXISTING PLUS PROJECT ROADWAY NOISE LEVELS

Intersection Number	Roadway Segment	Existing, dB(A) CNEL		Difference	Significant Impact?
		Without Project	With Project		
Camino Del Sol					
1	East of Rose Avenue	61.7	61.8	+0.1	No
1	West of Rose Avenue	61.5	61.6	+0.1	No
7	East of Rice Avenue	61.2	61.2	+0.0	No
7	West of Rice Avenue	66.8	66.9	+0.1	No
Cesar Chavez Drive					
2	East of Rose Avenue	56.0	56.8	+0.8	No

TABLE 4.13-10: EXISTING PLUS PROJECT ROADWAY NOISE LEVELS					
Intersection Number	Roadway Segment	Existing, dB(A) CNEL		Difference	Significant Impact?
		Without Project	With Project		
2	West of Rose Avenue	60.7	60.7	+0.0	No
Gonzalez Road					
3	East of Rose Avenue	67.8	67.8	+0.0	No
3	West of Rose Avenue	69.0	69.0	+0.0	No
6	West of Rice Avenue	66.2	66.3	+0.1	No
15	East of Oxnard Boulevard	68.9	68.9	+0.0	No
15	West of Oxnard Boulevard	66.6	66.7	+0.1	No
US-101 SB Off Ramp					
4	East of Rose Avenue	59.5	59.5	+0.0	No
4	West of Rose Avenue	66.3	66.5	+0.2	No
8	East of Rice Avenue	62.9	62.9	+0.0	No
8	West of Rice Avenue	66.7	66.7	+0.0	No
Auto Center Drive/US-101 NB Off Ramp					
5	East of Rose Avenue	62.8	62.8	+0.0	No
5	West of Rose Avenue	58.6	58.6	+0.0	No
9	East of Santa Clara Avenue	64.6	64.6	+0.0	No
9	West of Santa Clara Avenue	68.3	68.5	+0.2	No
5th Street					
10	East of Rose Avenue	65.5	65.6	+0.0	No
10	West of Rose Avenue	64.7	64.7	+0.0	No
11	East of Rice Avenue	64.7	64.7	+0.0	No
11	West of Rice Avenue	65.2	65.4	+0.2	No
14	East of Oxnard Boulevard	63.5	63.7	+0.2	No
14	West of Oxnard Boulevard	62.5	62.7	+0.2	No
Wooley Road					
12	East of Rose Avenue	59.5	59.5	+0.0	No
12	West of Rose Avenue	62.7	62.8	+0.1	No
13	East of Saviers Road	65.4	65.5	+0.1	No
13	West of Saviers Road	64.9	65.0	+0.1	No
Vineyard Avenue					
16	East of Oxnard Boulevard	66.1	66.1	+0.0	
16	West of Oxnard Boulevard	66.9	66.9	+0.0	
Rice Avenue					
6	North of Gonzalez Road	69.7	69.8	+0.1	No
6	South of Gonzalez Road	68.7	68.7	+0.0	No
7	North of Camino Del Sol	68.4	68.4	+0.0	No
7	South of Camino Del Sol	67.9	68.0	+0.1	No

TABLE 4.13-10: EXISTING PLUS PROJECT ROADWAY NOISE LEVELS					
Intersection Number	Roadway Segment	Existing, dB(A) CNEL		Difference	Significant Impact?
		Without Project	With Project		
8	North of US-101 SB Off Ramp	67.2	67.2	+0.0	No
8	South of US-101 SB Off Ramp	67.7	67.7	+0.0	No
Rose Avenue					
1	North of Camino Del Sol	66.2	66.6	+0.4	No
1	South of Camino Del Sol	66.0	66.3	+0.3	No
2	North of Cesar Chavez Drive	66.7	66.9	+0.2	No
2	South of Cesar Chavez Drive	66.5	66.6	+0.1	No
3	North of Gonzalez Road	68.9	69.1	+0.2	No
3	South of Gonzalez Road	68.4	68.7	+0.3	No
4	North of US-101 SB Off Ramp	75.2	75.3	+0.1	No
4	South of US-101 SB Off Ramp	68.7	68.8	+0.1	No
5	North of US-101 NB Off Ramp	74.5	74.6	+0.1	No
5	South of US-101 NB Off Ramp	67.9	67.9	+0.0	No
11	North of 5th Street	66.9	67.1	+0.2	No
11	South of 5th Street	66.0	66.1	+0.1	No
Santa Clara Avenue					
9	North of Auto Center Drive/ US-101 NB Off Ramp	64.3	64.3	+0.0	No
9	South of Auto Center Drive/ US-101 NB Off Ramp	65.7	65.7	+0.0	No
Saviers Road					
13	North of Saviers Road	65.9	65.9	+0.0	No
13	South of Saviers Road	66.9	66.9	+0.0	No
Oxnard Boulevard					
14	North of 5th Street	66.9	66.9	+0.0	No
14	South of 5th Street	66.7	66.7	+0.0	No
15	North of Gonzalez Road	69.2	69.2	+0.0	No
15	South of Gonzalez Road	68.7	68.7	+0.0	No
16	North of Vineyard Avenue	67.6	67.6	+0.0	No
16	South of Vineyard Avenue	69.6	69.6	+0.0	No

Source: Meridian Consultants. *Noise Study*. **Appendix O.**

Table 4.13-11: Cumulative plus Project Roadway Noise Levels illustrates the difference in traffic noise between cumulative conditions and cumulative plus Project conditions and represents the

increase in noise attributable to Project-related traffic (refer to **Appendix O** for the Noise Study). As shown in **Table 4.13-11**, the maximum noise level increase along the analyzed roadways were 0.7 dB(A) CNEL along Cesar Chavez Drive to the east of Rose Avenue. Consequently, Project-related traffic would not cause noise levels along the analyzed roadways to increase by more than 3.0 dB(A). Thus, the proposed Project would not result in a permanent increase in noise levels above ambient levels in the vicinity of the Project Site. Vehicular related noise impacts would not be considered significant.

TABLE 4.13-11: CUMULATIVE PLUS PROJECT ROADWAY NOISE LEVELS

Intersection Number	Roadway Segment	Cumulative, dB(A) CNEL		Difference	Significant Impact?
		Without Project	With Project		
Camino Del Sol					
1	East of Rose Avenue	64.2	64.3	+0.1	No
1	West of Rose Avenue	66.7	66.9	+0.2	No
7	East of Rice Avenue	62.1	62.1	+0.0	No
7	West of Rice Avenue	67.5	67.6	+0.1	No
Cesar Chavez Drive					
2	East of Rose Avenue	56.4	57.1	+0.7	No
2	West of Rose Avenue	60.8	60.8	+0.0	No
Gonzalez Road					
3	East of Rose Avenue	68.2	68.2	+0.0	No
3	West of Rose Avenue	69.5	69.5	+0.0	No
6	West of Rice Avenue	66.5	66.7	+0.2	No
15	East of Oxnard Boulevard	69.7	69.7	+0.0	No
15	West of Oxnard Boulevard	67.2	67.2	+0.0	No
US-101 SB Off Ramp					
4	East of Rose Avenue	59.6	59.6	+0.0	No
4	West of Rose Avenue	66.6	66.7	+0.1	No
8	East of Rice Avenue	61.5	61.5	+0.0	No
8	West of Rice Avenue	67.4	67.4	+0.0	No
Auto Center Drive/US-101 NB Off Ramp					
5	East of Rose Avenue	63.0	63.0	+0.0	No
5	West of Rose Avenue	58.7	58.7	+0.0	No
9	East of Santa Clara Avenue	64.7	64.7	+0.0	No
9	West of Santa Clara Avenue	69.1	69.2	+0.1	No
5th Street					
10	East of Rose Avenue	66.7	66.8	+0.1	No
10	West of Rose Avenue	66.8	66.8	+0.0	No
11	East of Rice Avenue	66.8	66.8	+0.0	No
11	West of Rice Avenue	66.7	66.7	+0.0	No

TABLE 4.13-11: CUMULATIVE PLUS PROJECT ROADWAY NOISE LEVELS					
Intersection Number	Roadway Segment	Cumulative, dB(A) CNEL		Difference	Significant Impact?
		Without Project	With Project		
14	East of Oxnard Boulevard	65.3	65.4	+0.1	No
14	West of Oxnard Boulevard	64.6	64.7	+0.1	No
Wooley Road					
12	East of Rose Avenue	59.6	59.6	+0.0	No
12	West of Rose Avenue	63.5	63.6	+0.0	No
13	East of Saviers Road	66.1	66.2	+0.1	No
13	West of Saviers Road	65.7	65.7	+0.0	No
Vineyard Avenue					
16	East of Oxnard Boulevard	66.7	66.7	+0.0	No
16	West of Oxnard Boulevard	67.5	67.5	+0.0	No
Rice Avenue					
6	North of Gonzalez Road	70.5	70.6	+0.1	No
6	South of Gonzalez Road	69.8	69.8	+0.0	No
7	North of Camino Del Sol	69.1	69.1	+0.0	No
7	South of Camino Del Sol	68.7	68.8	+0.1	No
8	North of US-101 SB Off Ramp	67.1	67.1	+0.0	No
8	South of US-101 SB Off Ramp	68.0	68.0	+0.0	No
Rose Avenue					
1	North of Camino Del Sol	66.6	66.9	+0.3	No
1	South of Camino Del Sol	66.7	66.9	+0.2	No
2	North of Cesar Chavez Drive	67.0	67.2	+0.2	No
2	South of Cesar Chavez Drive	66.9	67.0	+0.1	No
3	North of Gonzalez Road	69.4	69.5	+0.1	No
3	South of Gonzalez Road	68.8	69.0	+0.2	No
4	North of US-101 SB Off Ramp	75.5	75.6	+0.1	No
4	South of US-101 SB Off Ramp	68.8	68.9	+0.1	No
5	North of US-101 NB Off Ramp	74.8	74.8	+0.0	No
5	South of US-101 NB Off Ramp	68.1	68.1	+0.0	No
11	North of 5th Street	67.5	67.6	+0.1	No
11	South of 5th Street	66.8	66.9	+0.1	No
Santa Clara Avenue					
9	North of Auto Center Drive/ US-101 NB Off Ramp	64.7	64.7	+0.0	No

TABLE 4.13-11: CUMULATIVE PLUS PROJECT ROADWAY NOISE LEVELS					
Intersection Number	Roadway Segment	Cumulative, dB(A) CNEL		Difference	Significant Impact?
		Without Project	With Project		
9	South of Auto Center Drive/ US-101 NB Off Ramp	66.0	66.1	+0.1	No
Saviers Road					
13	North of Wooley Road	66.1	66.1	+0.0	No
13	South of Wooley Road	67.3	67.3	+0.0	No
Oxnard Boulevard					
14	North of 5th Street	67.2	67.2	+0.0	No
14	South of 5th Street	67.0	67.0	+0.0	No
15	North of Gonzalez Road	69.9	69.9	+0.0	No
15	South of Gonzalez Road	69.0	69.0	+0.0	No
16	North of Vineyard Avenue	68.2	68.2	+0.0	No
16	South of Vineyard Avenue	70.2	70.2	+0.0	No

Source: Meridian Consultants. Noise Study. **Appendix O.**

Stationary Noise

Stationary sources of noise that could be introduced in the area could include mechanical equipment, loading docks, and parking lots. Given that these projects would be required to adhere to the City's noise standards, all stationary sources would be required to have shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels.

Heating, Ventilation, and Air Conditioning (HVAC) Systems

The Project would introduce various stationary noise sources, including HVAC systems, which would be located either on the roof, the side of a structure or on the ground. Off-site and on-site sensitive receptors could be potentially affected by the introduction of such equipment. This equipment would be screened and integrated into the architectural design of the building and would further have to comply with the local allowable noise levels as listed in **Table 4.13-5**. The use of such equipment would not generate noise levels that would substantially elevate the ambient noise environment and would not generate substantial noise and impacts to nearby noise-sensitive receptors. Impacts would be less than significant.

Human Activity Related Noise

Future residents located on the Project Site, as well as nearby sensitive receptors, may experience increases in noise due to an increase in human activity within the area either from people living on the premises, utilizing the on-site amenities including common areas, and the outdoor parklet. Potential residential noise include people talking, doors slamming, stereos, and other noise

associated with human activity. These noise sources are generated by project occupants and are not considered significant under AB 1307.

Maximum permissible noise levels for residential uses range between 50–70 dB(A) with a conditionally acceptable range between 55–70 dB(A), as determined by the Draft Background Report. Overall, the noise generated by the Project's land uses would be consistent with the ambient noise levels in the Project Site, which range from 55.0 to 68.9 dB(A). Accordingly, impacts would be less than significant.

b. Would the project generate or expose persons to excessive groundborne vibration or groundborne noise levels?

Construction

The City has not adopted a significance threshold to assess vibration impacts during construction. Thus, the Caltrans *Transportation and Construction Vibration Guidance Manual*[20] is used as a screening tool to assess the potential for adverse vibration effects related to structural damage. Project construction activities would result in potentially significant impacts if ground-borne vibration levels were to exceed 0.2 ips PPV at the nearest off-site residential buildings. **Table 4.13-12: Construction Vibration Level Estimates—Building Damage** presents construction vibration impacts associated with on-site construction in terms of building damage, as well as typical vibration levels that could be expected from construction equipment at a distance of 50 feet (refer to **Appendix O** for the Noise Study). It is important to note pile driving would not be required during construction based on the geology and soils conditions on the site and the type of buildings planned. As shown in **Table 4.13-12**, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold at the nearby sensitive receptors for vibratory rollers, loaded trucks, jackhammers, large bulldozers, and small bulldozers. As such, construction vibration impacts would be less than significant.

TABLE 4.13-12: CONSTRUCTION VIBRATION LEVEL ESTIMATES—BUILDING DAMAGE

Site	Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment					Significance Threshold (ips PPV)
		Vibratory Roller	Loaded Trucks	Jackhammer	Large Bulldozer	Small Bulldozer	
Phase A							
1	**Single-family residential uses along Milagro Place and Gibraltar Street**	0.056	0.020	0.009	0.024	0.001	0.2
2	**Single-family residential uses along Festivo Street and Del Sol High School**	0.002	0.001	0.000	0.001	0.000	0.2

20 California Department of Transportation. *Transportation and Construction Vibration Guidance Manual.* September 2013. Accessed January 2024. https://cityofdavis.org/home/showdocument?id=4521.

TABLE 4.13-12: CONSTRUCTION VIBRATION LEVEL ESTIMATES—BUILDING DAMAGE

Site	Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment					Significance Threshold (ips PPV)
		Vibratory Roller	Loaded Trucks	Jackhammer	Large Bulldozer	Small Bulldozer	
3	Multifamily residential uses along Camino Del Sol	0.000	0.000	0.000	0.000	0.000	0.2
4	Single-family residential uses along Valentina Drive	0.002	0.001	0.000	0.001	0.000	0.2
5	Single-family residential uses along Vivana Drive	0.008	0.003	0.001	0.003	0.000	0.2
6	Single-family residential uses along Cesar Chavez Drive	0.037	0.013	0.006	0.0016	0.001	0.2
7	Del Sol High School	0.002	0.001	0.000	0.001	0.000	0.2
Phase C							
1	Single-family residential uses along Milagro Place and Gibraltar Street	0.000	0.000	0.000	0.000	0.000	0.2
2	Single-family residential uses along Festivo Street and Del Sol High School	0.001	0.000	0.000	0.000	0.000	0.2
3	Multifamily residential uses along Camino Del Sol	0.005	0.002	0.001	0.002	0.000	0.2
4	Single-family residential uses along Valentina Drive	0.008	0.003	0.001	0.003	0.000	0.2
5	Single-family residential uses along Vivana Drive	0.001	0.000	0.000	0.000	0.000	0.2
6	Single-family residential uses along Cesar Chavez Drive	0.000	0.000	0.000	0.000	0.000	0.2
7	Del Sol High School	0.026	0.010	0.004	0.011	0.000	0.2

Source: Caltrans, Transportation and construction Vibration Guidance Manual, https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf. Accessed November 2025.
Meridian Consultants. *Noise Study*. **Appendix O.**

Operation

Similar to existing conditions, the primary sources of vibration associated with operation would include passenger-vehicle circulation within the Project area and stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. Ground-borne vibration typically attenuates rapidly as a function of distance from the vibration source. Furthermore, the majority of the Project's operation-related

vibration sources, such as mechanical equipment, would incorporate vibration attenuation mounts as required by the particular equipment specifications. Therefore, operation would not substantially increase existing vibration levels in the immediate vicinity of the Project Site. Therefore, vibration impacts associated with operation would be less than significant.

c. For a Project located within the vicinity of a private airstrip or the airport land use plan for Oxnard Airport or within two miles of Naval Base Ventura County, Point Mugu, would the project expose people residing or working in the project area to excessive noise levels?

The Project Site is located approximately 2.0 miles east of the Oxnard Airport; however, the Project Site is not located within the Oxnard Airport noise contours. As such, the location of the Project would not result in excessive noise for residents or employees in the Project area. Therefore, impacts would be less than significant.

4.13.7 Cumulative Impacts

Noise

The City's 2030 General Plan Environmental Impact Report (EIR) determined that City-wide residential and non-residential land use developments under the General Plan have the potential to result in an increase in noise and vibration at varying times and intensities throughout the planning period. As such, it is expected that individual projects would have project-specific data and would be required to address, and if possible, mitigate any potential construction-related noise impacts to a less-than-significant level. As such, the cumulative impact of development on noise and vibration in the City were determined to be less than significant.

As detailed above, the proposed Sub-Neighborhood Plan would include implementation of **MM NOI-1** to reduce construction noise levels below the 80 dB(A) (Leq-8hr) threshold. The proposed Sub-Neighborhood Plan would be consistent with the City's general plan and applicable regulations in the City's Noise Element and Noise Ordinance. Therefore, the Project would not contribute to any significant cumulative impacts.

4.13.8 Level of Significance Without Mitigation

Impacts would be significant without mitigation measures.

4.13.9 Mitigation Measures

Noise levels generated by on-site construction equipment would be reduced by implementation of **MM NOI-1**, which are existing requirements and reasonably anticipated standard conditions based on local, State, or federal regulations and laws that are frequently required independently of CEQA review and serve to offset or prevent specific impacts.

MM NOI-1: Construction Noise Reduction Measures

The proposed Project shall comply with the City of Oxnard Noise Element and any subsequent ordinance that prohibit the emission or creation of noise beyond certain levels at adjacent uses.

To implement **MM-NOI-1** and reduce construction noise, the Contractor would be required to implement reduction measures, prior to the start of construction activities, as determined by the City of Oxnard, which may include but are not limited to:

- Install a temporary 8-foot-tall construction noise barrier between the Project Site and the single-family residential uses along Milagro Place and Gibraltar Street and along Cesar Chavez Drive, as well as between the Project Site and Del Sol High School.
- Retrofit mobile equipment with optimal muffler systems capable of reducing construction noise levels by 10 dB(A) or more.
- Enclose stationary equipment with shields capable of achieving noise reductions of up to 10 dB(A).
- Locate all construction areas for staging and warming up as far as possible from adjacent residential buildings and sensitive receivers.

4.13.10 Level of Significance After Mitigation

With implementation of **MM NOI-1**, impacts regarding construction noise would be less than significant.

4.14 POPULATION AND HOUSING

This section evaluates the potential effects of the population and housing growth that would result from the Project. As discussed in the Initial Study (**Appendix A**), impacts associated with the following Thresholds were determined to be less than significant: b) displace substantial numbers of existing people or housing, and c) loss of existing affordable housing. Therefore, further evaluation is not provided for these topics because the Project will not create significant impacts in those areas. The analysis below is partially based on the Household Size Assumption and Population Estimation Memorandum prepared for the proposed Project by RCLCO, provided in Appendix G of the Water Supply Assessment (**Appendix P**).

4.14.1 Existing Conditions

City of Oxnard

Population

The California Department of Finance (DOF) estimated the population of Ventura County (County) to be 842,886 in January 2020. The City of Oxnard's (City) 2020 population (206,352) accounted for 24% of the County's population. While California and Ventura County grew from 2010 to 2020 at rates of 7% and 2% respectively, Oxnard's growth rate was approximately 4%.[1]

Between 2020 and 2025, the County experienced a steady population decline, reaching an estimated 829,005 in 2025; a decrease of approximately 1.7%. During the same period, the City's population declined about 3.7%, with a 2025 estimate of 198,733.[2]

The City is located within the Southern California Association of Governments (SCAG) region, which serves as the metropolitan planning organization (MPO) for six counties—Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial. SCAG is responsible for developing long-range regional plans related to transportation, housing, and land use, including the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS [also known as Connect SoCal]) and the Regional Housing Needs Assessment (RHNA). These plans guide local jurisdictions in accommodating future population and housing growth in a coordinated manner. Population growth under SCAG's jurisdiction began slowing during the 2010s, largely due to declining fertility rates and a net loss from out-migration exceeding in-migration. The pandemic resulted in additional shocks, including a near-zero level of foreign immigration, fewer births and excess deaths from the pandemic itself. While

1 City of Oxnard. *2021–2029 Housing Element*. Accessed December 2024. https://www.oxnard.gov/wp-content/uploads/Oxnard-Housing-Element_October-2022_Clean_Reduced.pdf.

2 Department of Finance (DOF). "E-5 Population and Housing Estimates for Cities, Counties and the State, 2020–2025." Dataset. Accessed May 2025. https://dof.ca.gov/Forecasting/Demographics/Estimates/estimates-e5-2010-2021/.

these shocks appear to be dissipating substantially, the population of the region declined between 2019 and 2023.[3]

Housing

The City contained approximately 58,252 housing units in 2025.[4] From 2000 to 2018, there has been an increase in renters and a decrease in owners due to an increase in housing costs. The Regional Housing Needs Assessment (RHNA) is a process mandated by California State Law to determine the number of housing units that each city and county must plan for in order to meet the housing needs of all income levels in their community. **Table 4.14-1: City of Oxnard 2021–2029 Regional Housing Needs Assessment Allocation** below details the 2021–2029 RHNA Allocation for the City.

TABLE 4.14-1: CITY OF OXNARD
2021–2029 REGIONAL HOUSING NEEDS ASSESSMENT ALLOCATION

Jurisdiction	Extremely Low-Income (30% or less of MHI)	Very Low-Income (31%-50% of MHI)	Low-Income (50%-80% of MHI)	Moderate-Income (81%-120% of MHI)	Above Moderate-Income (>120% of MHI)	Total Units
Oxnard	920	920	1,071	1,538	4,100	8,549

Notes:
MHI: Median Household Income

Source: City of Oxnard. "Table D-1." *2021–2029 Housing Element*. October 2022. Accessed December 2024. https://www.oxnard.gov/community-development/long-range-planning-sustainability.

Table 4.14-2: Residential Units Approved, through February 2022 details the number of housing units that have been developed since the beginning of this City's General Plan 2021–2029 Housing Element planning period in June 2021 through February 2022. **Table 4.14-3: Remaining RHNA as of February 2022** details the remaining number of housing units that need to be developed by 2029 to meet the City's RHNA allocation units.[5]

3 Southern California Association of Governments (SCAG). *Connect SoCal 2024*. Accessed December 2024. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547.

4 DOF. "E-5 Population and Housing Estimates for Cities, Counties and the State, 2020–2025."

5 City of Oxnard. *2021–2029 Housing Element*.

TABLE 4.14-2: RESIDENTIAL UNITS APPROVED, THROUGH FEBRUARY 2022					
Project Name	Extremely Low/Very Low-Income (50% or less of MHI)	Low-Income (50%-80% of MHI)	Moderate-Income (81%-120% of MHI)	Above Moderate-Income (>120% of MHI)	Total
Single Family, Detached, July – December 2021	0	0	0	2	2
Duplexes, July – December 2021	0	0	0	4	4
F Street Condominiums, July – December 2021	0	0	0	12	12
Wagon Wheel, Oxford Flats, Single Family Attached, July – December 2021	0	0	0	24	24
Anacapa Townhomes, Single Family Attached, July – December 2021	0	0	0	16	16
Accessory dwelling units, July – December 2021	4	6	15	0	25
Accessory dwelling units, January – February 2022	3	7	2	0	12
Wagon Wheel, Oxford Flats, Single Family Attached, January – February 2022	0	0	0	12	12
TOTAL	**7**	**13**	**17**	**70**	**107**

Source: City of Oxnard. "Table D-2." *2021–2029 Housing Element*. October 2022. Accessed December 2024. https://www.oxnard.gov/community-development/long-range-planning-sustainability.

TABLE 4.14-3: REMAINING RHNA AS OF FEBRUARY 2022					
Status Toward Goal	Extremely Low/Very Low-Income (50% or less of MHI)	Low-Income (50%-80% of MHI)	Moderate-Income (81%-120% of MHI)	Above Moderate-Income (>120% of MHI)	Total
RHNA Allocation (2021–2029)	1,840	1,071	1,538	4,100	8,549
Under Construction or Approved	7	13	17	70	107
Remaining	**1,833**	**1,058**	**1,521**	**4,030**	**8,442**

Source: City of Oxnard. "Table D-3." *2021–2029 Housing Element*. October 2022. Accessed December 2024. https://www.oxnard.gov/community-development/long-range-planning-sustainability.

As detailed above, approximately 8,442 housing units are needed by 2029 to meet the RHNA planning goals. SCAG's Connect SoCal report (2024–2050) integrates transportation, housing, and land use planning to accommodate projected population and employment growth across the region. The report provides demographic and housing forecasts used by local jurisdictions to guide future development and infrastructure planning. According to the Connect SoCal report, the City is projected to contain approximately 70,600 housing units by 2050, which represents an increase of about 12,927 units compared to the City's existing 58,252 housing units.[6]

Employment

Table 4.14-4: Employment Base Growth Forecast presents current and projected employment base for the City, based on data from the SCAG.

TABLE 4.14-4: EMPLOYMENT BASE GROWTH FORECAST

	Year 2019	Year 2035	Year 2050
Employment	63,100	72,800	72,900

Source: SCAG. *SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Maulhardt-Stiles Sub-Neighborhood Plan Project* [SCAG NO. IGR11182]. March 2025. **Appendix B**.

Project Site

Population and Housing

The only housing on the Project Site is the Maulhardt residence in Area C. The Maulhardt family vacated the residence in 2024. As discussed in **Section 4.5: Cultural Resources**, the Maulhardt residence is an eligible historic resource, but the residence is not up to current building safety codes, and it is infeasible to relocate the building.

4.14.2 Regulatory Framework

Federal

No federal policies or regulations pertaining to population and housing are applicable to the proposed Project.

6 Southern California Association of Governments (SCAG). "Technical Reports: Demographics & Growth Forecast." *Final Connect SoCal 2024*. Accessed April 2024. https://scag.ca.gov/connect-socal.

State

California State Housing Element Law

California State Housing Element Law (California Government Code Chapter 3, Article 10.6)[7] establishes the requirements for the Housing Element of the General Plan, one of the seven mandatory General Plan Elements, discussed further below. State law requires that Housing Elements identify and analyze existing and projected housing needs and provide goals, policies, objectives, financial resources, and programs for the preservation, improvement, and development of housing. The Housing Element identifies ways in which housing needs of current and future residents can be met.[8] The California Legislature has determined that one of the State's primary housing goals is to ensure every resident has a decent home and suitable living environment.

Government Code Section 65588 requires that local governments review and revise the Housing Element of their comprehensive General Plans at least once every eight years. The City Council of the City of Oxnard adopted the 2021–2029 Housing Element on October 5, 2021, and formally certified the Housing Element within the General Plan on October 25, 2022.

California Government Chapter 3, Code Article 10.6

State Law requires each City and County to prepare and maintain a current Housing Element as part of the community's General Plan to attain a Statewide Goal of providing "decent housing and a suitable living environment for every California family."

To make adequate provision for the housing needs of people of all income levels, State law (Government Code 65583[c]) requires that the City, at a minimum, identify programs that do all the following:

1. Identify adequate sites, with appropriate zoning and development standards and services to accommodate the locality's share of the regional housing needs for each income level.
2. Assist in the development of adequate housing to meet the needs of extremely low-, very low, low-, and moderate-income households.
3. Address and, where possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for people at all income levels, as well as housing for people with disabilities.
4. Conserve and improve the condition of the existing affordable housing stock and preserve assisted housing developments at risk of conversion to market-rate housing.

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7 California Government Code, Article 10.6. Housing Element Law. Accessed September 2024. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&title=7.&part=&chapter=3.&article=10.6.

8 Government Code. Section 65583.

5. Promote equal housing opportunities for all people, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

Senate Bill 375

Implementation of Housing Law

Senate Bill (SB) 375 extended the time for a local government to review and revise Housing Elements from five years to eight years in certain areas within the State, including nonattainment regions[9] covered by a Metropolitan Planning Organization (MPO). SB 375 requires the development of an eight-year program that includes a schedule of actions, with timetables for each action, during the program period to accommodate the jurisdiction's share of regional housing needs and support sustainable community development. If the local agency fails to submit a valid Housing Element, it is subject to a four-year review cycle.[10] The City of Oxnard has submitted a valid Housing Element and remains on an eight-year review cycle.

Regional

Southern California Association of Governments (SCAG)

Pursuant to federal and State law, SCAG serves as a Council of Governments, Regional Transportation Planning Agency, and the Metropolitan Planning Organization for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG's mandated responsibilities include developing and maintaining regional and local area socio-economic forecasting and allocation models, which are utilized for long-range planning efforts by federal, State, and local agencies. Furthermore, these forecasts are used to develop and analyze potential impacts stemming from both public and private sector projects.

Specifically, SCAG is responsible, in coordination with other State and local agencies, for preparing the Regional Transportation Plan (RTP) and the RHNA. These documents include population, employment, and housing projections for the region and its 13 subregions.

The 2024 Connect SoCal report is the most recent update to the 2024–2050 RTP/SCS and represents the most likely future growth scenario for the region based on the information available at the time it was prepared.[11] The Connect SoCal report includes projections to 2050, accounting for a combination of recent and past trends and reasonable key technical assumptions. SCAG also sought input from local cities to prepare the Connect SoCal report.

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9 A nonattainment region is an area that does not meet one or more of the federal or state air quality standards established under the Clean Air Act.

10 Senate Bill No. 375, Chapter 728. Accessed March 2024. http://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_0351-0400/sb_375_bill_20080930_chaptered.pdf.

11 SCAG. *Final Connect SoCal 2024*. Accessed September 2024. https://scag.ca.gov/connect-socal.

SCAG utilizes three major growth indicators for the region: population, households, and employment. SCAG's regional forecast maintains the balance between employment, population, and households due to their interrelationship, assuming that employment growth is a driving force of regional population and household growth. Population, household, and employment estimates and forecasts are maintained at the jurisdictional and county level. The employment-population-household forecast framework has been the basis for developing the growth forecast for the SCAG region.[12]

Regional Housing Needs Assessment (RHNA)

For each review cycle, the California Department of Housing and Community Development (HCD) allocates a numeric regional housing goal to the SCAG, and SCAG is then mandated to distribute the numerical goal among the cities and counties in the region. This share for the SCAG region, which includes the counties of Riverside, San Bernardino, Los Angeles, Orange, Ventura and Imperial, is known as the RHNA, which is utilized as a planning goal for each community to accommodate housing through appropriate planning policies and land use regulations, and ensure that zones are appropriately designated to address anticipated housing demands during the Housing Element planning period.[13]

The RHNA process reflects the HCD projections of regional estimates of housing need based on population projections from the DOF. HCD apportions the statewide housing need to regional councils of governments. For this present housing element cycle, the southern California region was allocated a total of 1.34 million new units for the 2021–2029 planning period. The RHNA is nearly three times the allocation of prior housing element cycles and is largely due to historic underproduction of housing units.

The City has a RHNA goal of 8,549 new housing units for the housing element period between 2021–2029, consisting of 1,840 extremely/very low-income housing units, 1,071 low-income housing units, and 1,538 moderate income housing units, and 4,100 above moderate-income housing units.

Local

City of Oxnard General Plan

Chapter 8: Housing Element

The 2021–2029 Housing Element of the City's General Plan identifies and analyzes the current and future housing needs of residents within the City and establishes housing goals, policies, and

12 SCAG. "Regional Forecasting." Accessed January 2024. https://scag.ca.gov/regional-forecasting.

13 SCAG. "Regional Housing Needs Assessment." Accessed March 2024. https://scag.ca.gov/rhna.

programs to meet the needs of certain special populations and provide adequate development opportunities for the private and non-profit sectors.[14]

The following goals and policies in the City of Oxnard 2021–2029 Housing Element are applicable to the proposed Project:

Goal H-1 Monitored, maintained, and improved quality of existing housing and neighborhoods including tenant protections under state law.

Policy H-1.1 ***Monitor and Ensure Compliance***

Ensure compliance with property maintenance standards and monitor housing and neighborhood conditions and trends for early signs of deterioration.

Policy H-1.5 ***Historic Preservation***

Support the preservation and maintenance of historically and architecturally significant residential buildings and neighborhoods.

GOAL H-2 Opportunities for the development of quality new housing.

Policy H-2.1 ***Adequate Development Opportunities***

Designate sufficient sites for residential development with densities of 30 dwelling units per acre (du/acre) or greater to accommodate projects that cumulatively meet or exceed the lower income category of the RHNA allocation.

Policy H-2.2 ***Balanced Opportunities***

Provide opportunities to the private and public sectors to produce housing that meets the needs of special needs, extremely low-, very low-, low-, moderate-, and above moderate-income housing to achieve a balanced community.

Policy H-2.5 ***Parcel Assembly***

Foster the assembly of small and/or underutilized parcels such that they could provide feasible infill affordable housing development.

GOAL H-3 Expanded and protected housing opportunities for lower-income households and special needs groups.

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14 City of Oxnard. *2030 General Plan*. Adopted October 2006; amended December 2022. Accessed September 2024. https://www.oxnard.gov/community-development/long-range-planning-sustainability/general-plan.

Policy H-3.4 ***Inclusionary Housing Program***

Continue the Inclusionary Housing Program that requires new housing developments to reserve a portion of units for lower-income households or make a payment into the City's in-lieu fee program.

GOAL H-5 Ensure fair and equal housing opportunity.

Policy H-5.3 ***Choice***

Encourage the production and dispersal of new affordable housing for lower-income households throughout the city to promote choice and avoid an over-concentration within a neighborhood.

Policy H-5.7 ***Promote Infill Development***

Promote quality residential infill development through the creation/adoption of flexible development standards and other programs as funding resources allow.

Chapter 3: Community Development

The goals and policies set forth in the Community Development chapter of the City's General Plan are utilized to encourage a balanced community which is achieved through general plan and zoning consistency, fostering neighborhood stabilization and revitalization, and encouraging compatible commercial development that aligns with thoughtful urban design and development.

The following goals and policies in the Community Development chapter are applicable to the proposed Project:

GOAL CD-1 A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.

Policy CD-1.5 ***Housing Variety***

Promote the development of a variety of housing types throughout the City including apartments, condominiums, lofts, townhouses, and attached and detached single family units.

Policy CD-1.10 ***Jobs Housing Balance***

Consider the effects of land use proposals and decisions on efforts to maintain an appropriate jobs-housing balance ratio.

Goal CD-3 A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.

Policy CD-3.1 ***Neighborhood Preservation***

Protect existing residential neighborhoods from the encroachment of incompatible activities and land uses as determined through environmental review and/or determination by the Planning Commission.

Policy CD-3.3 ***Innovative Redevelopment***

Promote innovative design flexibility and possibly different residential densities in public and public/private redevelopment within existing neighborhoods through the use of alternative performance-oriented development standards, alternative development designs, development agreements, specific plans, mixed uses, and other development and planning techniques.

Goal CD-4 Commercial uses compatible with surrounding land uses to meet the present and future needs of Oxnard residents, employees, and visitors.

Policy CD-4.1 ***Mitigate Land Use Conflicts***

Mitigate conflicts between commercial and other land uses, especially residential and recreational uses.

Goal CD-7 Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.

Policy CD-7.1 ***Establishment of Urban Villages***

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

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

Policy CD-7.4 ***Urban Village Design Guidelines***

Develop Urban Village Design Guidelines that incorporate the following features, where appropriate:

- *Provide a variety of transportation choices and an interconnected multi-modal mobility network.*
- *Offer a variety housing choices and opportunities, including at least 15 percent affordable housing.*
- *Encourage compact development in order to free up more private and civic open space.*
- *Preserve open space, historic, cultural, and natural assets.*
- *Use green and sustainable building and planning technologies.*
- *Incorporate methods of measuring vehicle trips as part of the metrics required for a Sustainable Community Strategy (SB 375).*

Goal CD-9 A high quality visual image and perception of the City.

Policy CD-9.1 ***Neighborhood Identity***

Recognize, preserve, and improve the visual identity and character of existing neighborhoods. Infill development shall respect historic structures and be of compatible scale and character with historic areas.

4.14.3 Significance Thresholds

a. Would the project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

4.14.4 Methodology

The evaluation of population and housing impacts involves estimating the population and housing units that would be allowed by the proposed Sub-Neighborhood Plan and comparing those estimates to the SCAG population and housing forecasts for the City and the City's RHNA. This comparison is used to determine whether the proposed Sub-Neighborhood Plan would induce unplanned population growth or exceed the City's projected share of regional housing needs. By evaluating consistency with SCAG's growth forecasts and the RHNA, the analysis assesses whether the Project would result in substantial unanticipated growth that could place pressure on public services, infrastructure, or community resources.

4.14.5 Project Impacts

a. Would the project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

Less than Significant Impact.

Construction

Construction activities associated with the proposed Project would result in a temporary increase in the demand for construction workers. These workers may originate from within the City, surrounding areas of Ventura County, or elsewhere within the SCAG region. Given the Project Site's location within an urbanized metropolitan area with a large and diverse construction labor force, it is anticipated that a substantial portion of workers would be drawn from the local and regional labor pool, minimizing the need for long-distance commuting.

The proposed Project would involve conventional construction practices that do not require a highly specialized labor force or the permanent relocation of workers from outside the region. Construction is anticipated to occur over approximately five years and would be implemented in phases. Consequently, different construction crews would be present on-site during specific phases and for limited durations. Construction employment would therefore be temporary and intermittent, with workers on-site only for varying portions of the overall schedule.

Because construction employment demand would be short-term and the regional labor market is capable of meeting this need, the Project would not generate a substantial in-migration of construction workers or induce permanent population growth. Accordingly, impacts related to construction-related population and housing growth would be less than significant.

Operation

Population

The proposed Sub-Neighborhood Plan would allow the development of up to 950 residential units and up to 40,000 square feet of commercial uses. As shown in **Figure 3-9: General Plan Land Use Map** in **Section 3.0: Project Description** of this Draft EIR, the Project Site is designated Park (PRK) in Area A, Residential Low Medium (RLM) in Area B, and General Commercial (CG) in Area C. The PRK and CG designations are not expected to generate population growth under the City's General Plan. However, the RLM designation in Area B allows 7 to 12 dwelling units per acre (du/ac). Given Area B's size of approximately 50.7 acres, this would accommodate an estimated 355 to 609 dwelling units.

As discussed in **Section 4.11: Land Use and Planning** of this Draft EIR, as sub-neighborhood plans are adopted as amendments to the NECSP, the proposed Sub-Neighborhood Plan requires a corresponding General Plan Amendment and Zone Change to allow for the development as planned in the proposed Sub-Neighborhood Plan, which also includes residential, commercial and open

space development. The Project Site's General Plan land use designations would change from RLM, CG and PRK to RH (Residential High), CG and PRK.

A Household Size Assumption and Population Estimation Memorandum was prepared for the proposed Sub-Neighborhood Plan by RCLCO (**Appendix P**) based on similar residential developments in Ventura County.[15] Based on maximum development scenario for the proposed Sub-Neighborhood Plan, which would allow podium and multiplex/walk-up multifamily residences, the proposed Sub-Neighborhood Plan would have average household sizes ranging from 1.84 to 2.4 persons as presented in **Table 4.14-5: Estimated Maximum Population of the Proposed Project**. With a maximum of 950 units, the proposed Project would result in potential population increase of 2,064 persons**.**

TABLE 4.14-5: ESTIMATED MAXIMUM POPULATION OF THE PROPOSED PROJECT

Product Type	Average Household Size	Units	Population
Podium	1.84	386	710
Multiplex/Walk-up	2.40	564	1,354
Total			**2,064**

Source: RCLCO. *Household Size Assumption and Population Estimation Memorandum*. Drafted June 2024. **Appendix P**.

The City is estimated to have a population of approximately 228,600 people in 2050,[16] an approximate increase of 29,867 people from the 2025 population of 198,733. As mentioned above, the Project Site's current land use designations would allow a maximum of 609 dwelling units. Using an average household size of 2.12[17] persons per household, the current land use designation would generate a population of approximately 1,291 persons, which would represent approximately 4.3% of this expected population growth between 2025 and 2050 in the City. The proposed Project would represent 6.9% of this expected population growth between 2025 and 2050 in the City. Although the proposed Project would result in a higher population generation compared to the Project Site's General Plan land use designation, the population growth associated with the Project would still be a fraction of the City's planned population growth under SCAG's Connect SoCal population forecasts.

SCAG's Connect SoCal population forecasts are based on a combination of regional demographic modeling, economic trends, local jurisdictional input, and adopted land use plans, including each

15 RCLCO. *Household Size Assumption and Population Estimation Memorandum*. June 2024.

16 SCAG. *SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Maulhardt-Stiles Sub-Neighborhood Plan Project [SCAG NO. IGR11182]*. March 2025. **Appendix B**.

17 (1.84 + 2.40)/2 = 2.12.

city's General Plan, Housing Element, and RHNA allocation. These data sources are used to estimate future household formation, employment opportunities, and migration patterns through 2050. As such, development of the proposed Sub-Neighborhood Plan would not induce substantial unplanned population growth in the region directly (e.g., by proposing new homes and businesses) that would significantly impact regional planning goals and objectives. Therefore, impacts would be less than significant.

Housing

The proposed Sub-Neighborhood Plan would allow the development of up to 950 dwelling units. The City is estimated to have approximately 70,500 residential units in 2050,[18] an increase of 12,248 residential units from the 2025 housing supply of 58,252 residential units. As mentioned above, the Project Site's existing land use designation would allow up to 609 dwelling unit, which would represent approximately 5.0% of this expected population growth between 2025 and 2050 in the City. The proposed Project would represent 7.8% of the additional residential units projected in the City by 2050. Although the proposed Project would result in a higher housing unit generation compared to the Project Site's General Plan land use designation, the housing growth associated with the Project would still be a fraction of the City's planned housing growth under SCAG's Connect SoCal housing forecasts.

The proposed Project would dedicate 15% of the residential units for affordable housing. For sale residential units, at least 15% would be Low Income (or more affordable level) and for rent/leased residential units, there would be a minimum 5% Very Low Income (or more affordable level) and minimum 10% Low Income (or more affordable level). As discussed above, the development of approximately 8,442 additional housing units by 2029 is needed to meet the current RHNA target for the City. The 950 additional housing units allowed by the Project would provide approximately 11.3% of the additional units needed to meet the RHNA target for the City.

Employment Base

The proposed Project would also include up to 40,000 square feet of neighborhood serving commercial space. According to the SCAG Employee Density Study, one employee is required for every 412 square feet of commercial space.[19] Therefore, it is estimated that the proposed Project would require a maximum of 98 employees. As shown in **Table 4.14-4** above, it is expected that the employment base in the City from 2019 to 2050 is expected to increase by approximately 9,800 employees. The proposed Project would generate approximately 1% of the expected increase in employment in the City from 2019 to 2050. The proposed Project would develop general commercial land uses that would serve the neighborhood. Therefore, employees are not expected to relocate

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18 SCAG. *SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Maulhardt-Stiles Sub-Neighborhood Plan Project [SCAG NO. IGR11182]*.

19 SCAG. *Employee Density Study*. 2001. Accessed December 2024. https://www.mwcog.org/file.aspx?A=QTTlTR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D.

from outside the region and indirectly inducing further population growth. Similar to population, SCAG's Connect SoCal employment base forecasts are based on a combination of regional demographic modeling, economic trends, local jurisdictional input, and adopted land use plans. As such, development of the proposed Sub-Neighborhood Plan would not induce substantial unplanned employment base growth in the region directly that would significantly impact regional planning goals and objectives. Therefore, impacts would be less than significant.

Indirect Impacts

Indirect population and housing growth impacts could result from the development or extension of roads and utilities associated with the proposed Project, which may facilitate or accommodate additional development and population growth in the surrounding area. However, the Project Site is in an urban portion of the City that is surrounded by existing roads, utilities and development. While the proposed Project would further connect portions of the City that are not currently connected, the Project area is fully developed and would not create indirect population and housing growth impacts. Therefore, impacts would be less than significant.

In conclusion, the population, housing and job growth associated with the proposed Project would be a portion of the City's forecasted population, housing and job growth. Additionally, as the Project Site is located in a developed portion of the City, there would be less than significant indirect population and housing growth impacts. Therefore, the proposed Project would have less than significant population and housing impacts.

4.14.6 Cumulative Impacts

As described in this section, a sub-neighborhood plan in the NECSP would allow a corresponding General Plan land use amendment and Zone Change to develop the Project Site as planned in the proposed Sub-Neighborhood Plan. Although the proposed Sub-Neighborhood Plan would create more population and housing growth in the City compared to the Project Site's land use designations as shown in **Table 4.14-6: Population and Housing Growth Comparison**, the population and housing numbers would be within the City's future population and housing growth projections. Additionally, jobs are within the City's projected growth forecasts. Therefore, the proposed Project would not contribute to any cumulative impacts associated with substantial unplanned population growth in the area.

TABLE 4.14-6: POPULATION AND HOUSING GROWTH COMPARISON

	Population Growth (Persons)	Percent of City's Projected Population Growth (2025–2050)	Housing Growth (Dwelling Units)	Percent of the City's Projected Housing Growth (2025 by 2050)
General Plan Land Use	1,291	4.3	609	5.0
Proposed Project	2,064	6.9	950	7.8

Source: SCAG. "Regional Forecasting." Accessed October 2025. https://scag.ca.gov/regional-forecasting.

4.14.7 Level of Significance Without Mitigation

Impacts would be less than significant without mitigation.

4.14.8 Mitigation Measures

No mitigation measures are required.

4.14.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

4.15 PUBLIC SERVICES AND RECREATION

This section analyzes the potential environmental effects on public services and recreational facilities from implementation of the proposed Sub-Neighborhood Plan. For purposes of this Draft Environmental Impact Report (DEIR), the public service and recreation analysis includes fire protection and emergency response, police protection, schools, parks, recreational facilities, and libraries. This section provides information from the City's fire and police departments to determine existing service conditions and the need to construct new, or expand existing facilities to provide adequate services to the Project.

4.15.1 Existing Conditions

Fire Protection

The Oxnard Fire Department (OFD) provides fire response, emergency medical services (EMS), hazardous materials response, and Urban Search & Rescue services in the City of Oxnard, serving approximately 200,000 residents and approximately 26 square miles.[1] The OFD also has automatic and mutual aid agreements with Ventura County and the City of Ventura for emergency assistance.

The OFD has eight fire stations in the City. All eight stations would serve the Project Site, but the closest fire station serving the development would be Fire Station 5 located at 1450 Colonia Road, approximately 1,500 feet west of the Project Site. The next closest fire stations would be Oxnard Fire Stations 1, 4 and 8. All OFD stations are fully staffed. The location, staffing and equipment for all OFD stations are identified below.[2]

Fire Station 1

- *Location*: 491 South K Street, approximately two miles southwest from the Project Site.
- *Staffing*: Two captains, two engineers, and three firefighters.
- *Equipment*: One fire engine and one ladder truck.

Fire Station 2

- *Location*: 531 East Pleasant Valley Road, approximately four miles southwest from the Project Site.
- *Staffing*: One captain, one engineer, and one firefighter.
- *Equipment*: One fire engine.

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1 Oxnard Fire Department (OFD). "Fire Response and Emergency Medical Services." Accessed Nov. 17, 2025. https://www.oxnard.gov/fire-department/fire-response-emergency-services.

2 Correspondence between Aaron Baker, OFD Battalion Chief, and Victor Paitimusa, Project Manager, Meridian Consultants, on September 29, 2025.

Fire Station 3

- *Location*: 150 Hill Street, approximately two miles southwest from the Project Site.
- *Staffing*: One captain, one engineer, and one firefighter.
- *Equipment*: One fire engine.

Fire Station 4

- *Location*: 230 West Vineyard Avenue, approximately 1.6 miles northwest from the Project Site.
- *Staffing*: One captain, one engineer, and two firefighters.
- *Equipment*: One fire engine.

Fire Station 5

- *Location*: 1450 East Colonia Road, approximately 1,500 feet west from the Project Site.
- *Staffing*: One captain, one engineer, and one firefighter.
- *Equipment*: One fire engine and one cross-staffed Light and Air Unit.

Fire Station 6

- *Location*: 2601 Peninsula Road, approximately 4.5 miles southwest from the Project Site.
- *Staffing*: One captain, one engineer, one firefighter, and one paramedic.
- *Equipment*: One fire engine, one cross-staffed ocean rescue vehicle, one cross-staffed ocean rescue watercraft, and a two-person staffed paramedic squad vehicle.

Fire Station 7

- *Location*: 3300 Turnout Park Circle, approximately 2.5 miles northwest from the Project Site.
- *Staffing*: One captain, one engineer, one firefighter, and one battalion chief.
- *Equipment*: One fire engine, one battalion chief vehicle, and a cross-staffed Hazardous Materials Response Vehicle.

Fire Station 8

- *Location*: 3000 South Rose Avenue, approximately 2.6 miles south from the Project Site.
- *Staffing*: Two captains, two engineers, four firefighters, one battalion chief, and one paramedic.
- *Equipment*: One fire engine, one ladder truck, one battalion chief command vehicle, a two-person staffed paramedic squad vehicle, and a cross-staffed Urban Search & Rescue Response Vehicle.

These stations currently provide adequate fire protection services throughout the City.[3] The OFD's desired response times are consistent with the National Fire Protection Association (NFPA) 1710

[3] Correspondence between Aaron Baker, OFD Battalion Chief, and Victor Paitimusa, Project Manager, Meridian Consultants, on September 29, 2025.

standards, which establishes a 90% compliance goal of 6 minutes 20 seconds for the first engine arrival on structure fires and an 8-minute travel time for the full first alarm assignment. EMS calls are given a total response time of 5 minutes or less. Non-emergency calls are responded to as resources are available.[4]

Police Protection

The Oxnard Police Department (OPD) provides law enforcement services in the City, including to the Project Site. The OPD's mission is to protect the community with exceptional service, in line with the organization prioritizing community policing, neighborhood level problem solving and community engagement.

The OPD is staffed with 246 authorized sworn positions and 127 professional staff who provide critical support services.[5] The OPD serves approximately 200,000 residents within its service area, which spans approximately 26 square miles.[6] The OPD maintains a response time to "Priority 1+" (emergency) service calls that averages under 5 minutes, with an average response time of 3 minutes and 46 seconds.[7] The OPD operates primarily from its main station located at 251 South C Street, approximately 1.34 miles southwest of the Project Site. The City is subdivided into 4 districts. Each district has 2 to 3 beats. A beat is a designated geographic area of the City assigned to patrol officers for routine law enforcement services, including emergency response, crime prevention, and community policing activities. Each beat has its dedicated Beat Coordinator. These districts are used by the OPD for allocating officers.[8]

The Project Site is within District 1, Beat 31. The backup beats are Beat 12 to the north, Beat 32 to the south, and Beat 11 to the west. Current staffing levels for Beat 31 include a Neighborhood Policing Team (1 Sergeant, 1 Corporal, 1 Traffic Service Assistant) and 3 Patrol Officers (1 per shift), under the oversight of 1 Patrol Commander. In 2024, there were 7,276 calls for service in Beat 31. The average response time for Beat 31 for "Priority 1+" (emergency) service calls was 4 minutes and 7 seconds, which is under the City's target response time of 5 minutes.[9] As such, OPD currently provides adequate service for the Project area.

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4 National Fire Protection Association. *NFPA 1710 –Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 ed*.

5 Oxnard Police Department (OPD). "Oxnard Police Headquarters." Accessed January 2025. https://www.oxnard.gov/oxnard-police-hq.

6 OPD. "Oxnard Police Headquarters."

7 Correspondence between Juan Morales, OPD Sergeant, Patrol Support Division, and Joe Pearson II, Planning and Environmental Services Manager, City of Oxnard, on August 15, 2025.

8 OPD. *Neighborhood Watch Participant Handbook*. Accessed November 2025. https://www.oxnard.gov/wp-content/uploads/OPD-NW-handbook-2021.pdf.

9 Correspondence between Juan Morales, OPD Sergeant, Patrol Support Division, and Joe Pearson II, Planning and Environmental Services Manager, City of Oxnard, on August 15, 2025.

Education

In the Project area, elementary and middle school services are provided by the Rio School District (RSD). The elementary and middle schools that would serve the Project Site are Rio Rosales Elementary School and Rio Del Valle Middle School.[10] Rio Rosales Elementary School is located at 1001 Kohala Street, approximately 0.1 miles east and adjacent to the Project Site. Rio Rosales Elementary School serves kindergarten through fifth grade, with a student population of 548 students.[11] Rio Del Valle Middle School is located at 3100 North Rose Avenue, approximately 1.4 miles north of the Project Site. Rio Del Valle Middle School serves grades sixth through eighth grade, with a student population of 565 students.[12]

The Oxnard Union High School District (OUHSD) would provide high school services to the Project and Del Sol High School, located in Area B, would serve the Project Site.[13] Del Sol High School opened in 2023 with only a freshman class and is currently serving freshman and sophomores, with juniors being added next year and seniors the following year. As a result of this phasing, the school is expected to fully operate as a grade 9–12 high school in 2026. The northern portion of the campus is still under construction to finish the remaining facilities by the end of 2025, including softball and baseball fields, football field with bleachers, a pool, locker buildings, tennis courts, and three additional surface parking lots. Development associated with the proposed Sub-Neighborhood Plan is anticipated to be completed by the end of 2032, meaning the high school would be fully developed and operational to serve the students that would be generated by the proposed Sub-Neighborhood Plan.

Parks and Recreation

The City's Parks Division provides safe, well-maintained parks and public places. The Oxnard Parks and Recreation Master Plan, adopted by the Oxnard City Council on February 16, 2021, guides decision-making for the future development and management of parks, recreation facilities, beaches, and open space within the City. The Parks Division owns and manages 53 parks covering approximately 416 acres.[14] There are 6 parks within a 0.5-mile radius of the Project Site, including:

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10 Rio School District. "My School Locator." Accessed December 2024. https://www.rioschools.org/69166_2.

11 Correspondence between Veronica Rauschenberger, RSD Executive Director, Joel Kirschenstein, Copresident of Sage Realty Group, and Victor Paitimusa, Project Manager, Meridian Consultants, on March 9, 2026

12 Correspondence between Veronica Rauschenberger, RSD Executive Director, Joel Kirschenstein, Copresident of Sage Realty Group, and Victor Paitimusa, Project Manager, Meridian Consultants, on March 9, 2026.

13 Oxnard Union High School District. "Boundary Locator." Accessed December 2024. https://woolpertinc.maps.arcgis.com/apps/webappviewer/index.html?id=2c7a7282460c4336a6b3bd6e66ff8ede.

14 City of Oxnard. *City of Oxnard Parks & Recreation Master Plan*. February 2021. Accessed October 2025. https://www.oxnard.gov/public-works/parks-division.

East Village Park to the east, Thompson Park and Kohala Park to the south, Del Sol Park and Colonia Park to the southwest, and West Village Park to the west.[15]

Libraries

The Oxnard Public Library (OPL) Department offers free access to information, resources, exhibits, programs and more for community members. The OPL has approximately 400,000 items in its collection, including print materials, digital resources, and audio-visual media available for public use. The OPL Department consists of three locations, including the Oxnard Main Library, South Oxnard Library, and Colonia Library, including approximately 95,560 square feet of library space, including 72,000 square feet at the Oxnard Main Library, 23,000 square feet at the South Oxnard Library, and 560 square feet at the Colonia Library.[16] The Colonia Library Branch is the closest to the Project Site, approximately 0.25 miles southwest of the Project Site.[17]

4.15.2 Regulatory Framework

Federal

No federal policies or regulations pertaining to public services and recreation are applicable to the proposed Project.

State

Fire Protection

Occupational Safety and Health Administration (OSHA)

The California OSHA enforces the provisions of the State Occupational Safety and Health Act, which requires implementation of safety and health regulations under Title 24 of the California Code of Regulations (CCR).[18] Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to a project site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating on-site fire-fighting equipment (e.g., sprinklers); and keeping sites free from the accumulation of unnecessary combustible materials.

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15 City of Oxnard. "Find a Park: Public Parks Map." Accessed January 2025. https://www.oxnard.gov/public-works/parks/find-a-park.

16 City of Oxnard. "Oxnard Local History Collection." Accessed January 2025. https://www.oxnard.gov/cultural-community-services/oxnard-public-library/oxnard-local-history-collection?utm.

17 Library Technology. "Oxnard Public Library." Accessed January 2025. https://librarytechnology.org/library/1687?.

18 California Legislature. California Labor Code. Division 5. Safety in Employment. Section 6300. 2025. California Code of Regulations. Title 8. Industrial Relations. Section 3203. Injury and Illness Prevention Program. 2025.

California Office of Emergency Services (OES)

The California Emergency Management Agency was incorporated into the Governor's Office on January 1, 2009, by Assembly Bill (AB) 38, and merged the duties, powers, purposes, and responsibilities of the Governor's OES with those of the Governor's Office of Homeland Security.[19] Cal OES is responsible for the coordination of overall state agency response to major disasters in support of local government. The agency is responsible for ensuring the state's readiness to respond to and recover from all hazards—natural, man-made, emergencies, and disasters—and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

The Cal OES Fire and Rescue Division coordinates statewide response of fire and rescue mutual aid resources to all types of emergencies, including hazardous materials incidents. The Operations Section under the Fire and Rescue Division coordinates the California Fire and Rescue Mutual Aid System, and coordinated response through the Mutual Aid System includes responses to major fires, earthquakes, tsunamis, hazardous materials, and other disasters.

California Building Code (CBC)

The CBC, contained in Part 2 of Title 24 of the CCR, identifies building design standards, including those for fire safety.[20] The CBC is based on the International Building Code but has been amended for California conditions. The CBC is updated every three years, and the current 2022 CBC went into effect on January 1, 2023. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of fire sprinklers in all new residential, high-rise, and hazardous materials buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code (CFC)

The CFC, contained in Part 9 of Title 24 of the CCR, incorporates by adoption the International Fire Code of the International Code Council, with California amendments.[21] The CFC is updated every three years, and the current 2022 CFC went into effect on January 1, 2023. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. The CFC

19 California Governor's Office of Emergency Services. "History and Organization." December 2014. Accessed December 2024. https://www.caloes.ca.gov/cal-oes/history/.

20 California Code of Regulations. Title 24. California Building Standards Code. Part 2. California Building Code. 2022.

21 California Code of Regulations. Title 24. California Building Standards Code. Part 9. California Fire Code. 2022.

regulates building standards in the CBC, fire department access, fire protection systems and devices, fire and explosion hazards safety, hazardous materials storage and use, and standards for building inspection.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities and counties are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the county will comply with that provision to ensure that public safety services are provided.

Police Protection

State Emergency Response/Evacuation Plans

OES coordinates the overall response of State agencies to major disasters in support of local government. The office is responsible for (1) assuring the State's readiness to respond to and recover from natural, manmade, and war-caused emergencies; and (2) assisting local governments in their emergency preparedness, response, and recovery efforts. Accordingly, the Cal OES maintains the State Emergency Plan, which outlines the organizational structure for the State's response to natural and manmade disasters. The Cal OES also assists local governments and other state agencies in developing their own emergency preparedness and response plans, in accordance with the Standardized Emergency Management System (SEMS) and State Emergency Plan, for earthquakes, floods, fires, hazardous material incidents, nuclear power plant emergencies, and dam breaks. Each jurisdiction is required to show the Cal OES that it follows SEMS through several measures, including preparation and maintenance of an up-to-date emergency management plan, which incorporates an emergency evacuation plan. Non-compliance with SEMS can result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. The Cal OES also coordinates an emergency organizational network, comprised of the Cal OES, local Emergency Operations Centers (EOCs) in the State, cities, and regional EOCs within each county.

Schools

Leroy F. Greene School Facilities Act (1998)

California Government Code Section 65995 (The Leroy F. Greene School Facilities Act of 1998) also known as SB 50 sets base limits and additional provisions for school districts to levy development impact fees and to help fund expanded facilities to house new pupils that may be generated by the development project. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under CEQA. These fees may be adjusted by the District over time as conditions change.

Parks and Recreation

Quimby Act

Section 66477 of the California Government Code, also known as the Quimby Act, was established by the California legislature in 1965 to provide parks for the growing communities in California. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map.[22] The Quimby Act also specifies acceptable uses and expenditures of such funds.[23]

Regional

Parks and Recreation

Southern California Association of Governments (SCAG) Connect SoCal 2024

SCAG's Connect SoCal 2024 serves as a regional plan including land use and open space. Connect SoCal 2024 provides a framework for regional growth and development for recreational areas.

Local

City of Oxnard General Plan

The City's 2030 General Plan Goals and Policies for Community Development (CD), Infrastructure and Community Services (ICS), Environmental Resources (ER), and Safety & Hazards (SH) contains relevant goals and policies related to fire protection, police protection and park services that are applicable to proposed Project.

GOAL CD-1 A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.

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22 California Legislature. California Government Code. Title 7. Planning and Land Use. Division 2. Subdivisions. Section 66477. 2025.

23 California Legislature. California Government Code. Title 7. Planning and Land Use. Division 2. Subdivisions. Section 66477(a). 2025.

CD-1.6: ***Public Facilities***

Enhance resident quality of life by providing adequate space for schools, libraries, parks and recreation areas, as well as space for the expansion of public facilities to support the community's vision.

CD-1.8: ***Natural Resource Conservation***

Promote a high quality of life within the community, incorporating the retention of natural open space areas, greenbelts, and the provision of adequate recreational facilities.

GOAL CD-3 A city of stable, safe, attractive, and revitalized neighborhoods with adequate parks, schools, infrastructure, and community identity and pride.

GOAL CD-7 Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.

CD-7.12: ***Urban Village Collocation with Schools***

Promote the collocation of parks with school facilities for the purpose of enhancing available open space and recreation.

CD-7.13: ***Urban Village Trail and Open Space Connections***

Include trails (pedestrian and bicycle) and open space areas, where feasible within urban village areas. These facilities shall create a network that links urban villages and other neighborhoods to each other.

GOAL CD-8 Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.

CD-8.2: ***Services***

Continue to ensure that public services and facilities are in place at the time of need or prior to the time new development occurs in order to avoid overloading existing urban service systems.

CD-8.8: ***Public Facility Service Areas***

Provide appropriate service areas for existing and planned public facilities such as a museum, secondary and elementary schools, fire stations, branch libraries, community centers, parks, and infrastructure utility for support facilities.

GOAL CD-15 A strong economic and fiscal base critical to sustaining long-term prosperity for Oxnard residents and businesses.

CD-15.1: ***Quality of Life***

Strive to maintain and enhance the City's quality of life through better business opportunities; increased leisure, cultural, and recreational opportunities; upgraded public facilities and amenities; and a range of residential opportunities.

GOAL ICS-1 Provision of adequate facilities and services that maintain service levels, with adequate funding.

ICS-1.1: ***Maintain Existing Service Levels***

Maintain the high priority of providing services to residents and visitors, and prevent deterioration of existing service levels.

ICS-1.2: ***Development Impacts to Existing Infrastructure***

Review development proposals for their impacts on infrastructure (e.g., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.

ICS-1.3: ***Funding for Public Facilities***

Continue to utilize developer fees, public facilities fees, and other methods (e.g. grant funding or assessment districts) to finance public facility design, construction, operation, and maintenance.

ICS-1.4: ***Infrastructure Conditions of Approval***

New development should not be approved unless:

- *The applicant demonstrates adequate public services and facilities are available;*
- *Infrastructure improvements incorporate a range of feasible measures that can be implemented to reduce all public safety and/or environmental impacts associated with the construction, operation, or maintenance of any required improvement;*
- *Infrastructure improvements are consistent with City infrastructure master plans; and*
- *Required infrastructure needed for future new development is self-funded.*

GOAL ICS-19 Adequate and effective law enforcement and the incorporation of crime prevention features in developments.

ICS-19.1: ***Additional and / or Enlarged Police Facilities***

Monitor the need for additional or enlarged police facilities.

ICS-19.2: ***Police Review of Development Projects***

Continue to require the Police Department to review proposed development projects and provide recommendations that enhance public safety.

ICS-19.4: ***Crime Prevention Device Requirements***

Require crime prevention devices (e.g. deadbolt locks, peepholes, etc.) in all new development.

ICS-19.5: ***Incorporating Security Design Principles***

Encourage crime prevention and defensible space through design principles such as those employed through the National Crime Prevention Through Environmental Design program, Neighborhood Watch Program, and/or other appropriate methods to enhance public safety.

ICS-19.7: ***New Development***

Require new development to fund a fair share extension of police services to maintain service standards, including personnel and capital improvement costs.

ICS-19.8: ***Response Time***

Achieve and maintain an average response time of five (5) minutes or less for priority one calls.

GOAL ICS-20 Protected public through effective fire protection services and the incorporation of fire safety features in new development.

ICS-20.1: ***Fire Response Time***

Achieve and maintain a response time of five (5) minutes 90 percent of the time as a goal for service call response and siting of new fire stations.

ICS-20.2: ***Provision of Fire Station Facilities and Equipment***

Achieve and maintain fire station facilities, equipment (engines and other apparatus), and staffing necessary to maintain the City's service standards (ISO rating and response time).

ICS-20.3: ***Commercial and Industrial Sprinkler Requirements***

Require new commercial, residential, and industrial development to provide sprinklers and related fire detection and suppression equipment per City Fire Department requirements and incorporate measures for fire prevention and access for firefighting personnel and equipment.

ICS-20.4: ***Fire Prevention Mitigation Fee***

Consider implementing a Fire Prevention Mitigation Fee to provide a continued adequate level of fire prevention service.

ICS-20.5: ***Fire Services to New Development***

Require new development to fund a fair share extension of fire services to maintain service standards, including personnel and capital improvements costs.

ICS-20.7: ***Adherence to City Standards***

Ensure that water main size, water flow, fire hydrant spacing, and other fire facilities meet City standards.

ICS-20.8: ***Development Review***

Review new development applications to assess potential impacts to existing fire protection services and the need for additional and expanded services.

ICS-20.10: ***Adequate Emergency Access and Routes***

Require that new development provide adequate access for emergency vehicles, particularly firefighting equipment, and evacuation routes, as appropriate.

GOAL ICS-21 High-quality, well-maintained school facilities for the residents of Oxnard.

ICS-21.1: ***Accommodating Growth***

In coordination with the local school districts, designate sites for new school facilities in order to ensure that the number, type, and location of school facilities are commensurate with growth.

ICS-21.2: ***Development Fees***

Continue to require school impact development mitigation fees from new commercial, industrial, and residential development.

ICS-21.3: ***Siting of Schools***

Minimize the student crossing of major arterial or collector streets by encouraging school districts to site schools within residential neighborhoods, where appropriate.

ICS-21.4: ***Mitigation of Impacts***

To the extent allowable under State law, require new projects to mitigate impacts on school facilities, and evaluate alternatives for funding such as assessment districts.

ICS-21.6: ***Monitor Enrollment Needs***

Continue to work with school districts to monitor housing, population, and school enrollment trends in order to determine future enrollment needs. In particular, assess the anticipated housing and population growth during the development of specific plans and large projects to determine school facility needs.

GOAL ICS-22 A full service, high quality public library system.

ICS-22.3: ***Expansion of Library Services***

Continue to adjust library services to meet the educational, informational, and cultural needs of all City residents.

GOAL ICS-23 A full range of recreational facilities and services accessible to all Oxnard residents, workers, and visitors.

ICS-23.1: ***City Park and Recreation Standards***

Provide park and recreation facilities at a level that meets the standards for neighborhood and community parks as follows:

Type of Park	Net Acres/ 1000 Residents	Min. Net Acres/Park	Service Radius
Mini/Pocket	No standard	No standard	1/3 mile
Neighborhood	1.5	5	½ - 1 mile
Community	1.5	20	1 – 1 ½ miles
TOTAL	**3.0**	**N/A**	**N/A**

Notes:
Source: City of Oxnard. "2030 General Plan." (p. 4-27). Accessed January 2025. https://www.oxnard.gov/wp-content/uploads/Oxnard-2030-General-Plan-Amend-12.2022-SMc.pdf.

ICS-23.3: ***Identifying Additional Parklands***

Prior to incorporation of residential projects or areas into the City, assess the need for additional parkland and the need and

desire for pet-friendly areas within parks.

ICS-23.4: ***Collocation of Parks and Schools***

Future neighborhood park sites shall be located next to school sites whenever feasible.

ICS-23.8: ***Buffering Neighborhood Parks***

Create buffer zones between neighborhood park facilities and adjacent residences.

ICS-23.10: ***Park Siting and Design to Maximize Security***

Require that new parks be located and designed in such a way as to facilitate their security and policing.

GOAL ER-2 Maintenance and enhancement of natural resources and open space.

ER-2.3: ***Promote Areas for Open Space***

Reserve, preserve, and promote areas particularly suited for open space/recreational uses. Appropriate public access to these resources shall be preserved, enhanced, restored, and properly controlled.

GOAL SH-4 Emergency preparedness through the provision of adequate fire and police protection, infrastructure, emergency supply stockpiling, public education, EOC planning and procedures, and outreach programs.

4.15.3 Significance Thresholds

a. Would the project increase demand for fire protection service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?

b. Would the project increase demand for law enforcement service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?

c. Would the project increase demand for schools such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?

d. Would the project increase the use of existing park facilities such that substantial physical deterioration of the facilities would occur or be accelerated or that new or expanded park facilities would be needed to maintain acceptable service levels?

e. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would occur or be accelerated?

f. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

g. Would the project increase the need for or use of existing library or other community facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

4.15.4 Methodology

The methodology for evaluating potential environmental impacts related to public services and recreation is as follows:

1. City and other applicable planning documents were reviewed to identify existing environmental conditions and issues related to public services and recreation.
2. The estimated population increase from the Project is discussed in the Household Size Assumption Memo prepared for the proposed Project by Real Estate Consulting (RCLCO) (**Appendix P**) which completed a demographic analysis using detailed Census data for neighborhoods in the City of Oxnard and nearby communities in Ventura County to determine appropriate household sizes for the various types of residential units that would be allowed by the proposed Project. To explore the demographics of the market for the various residential product types at a deeper level, RCLCO relied on the 2020 U.S. Census Redistricting Data.[24]
3. Correspondence with fire and police personnel to ask whether the proposed Sub-Neighborhood Plan would require new or expanded facilities to ensure adequate fire and police services to the Project.[25,26]
4. The Project was qualitatively assessed to determine whether any significant impacts to public services and/or recreation would occur based on the estimated increase in population that would result from the development of the proposed Project.

4.15.5 Project Impacts

a. Would the project increase demand for fire protection service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?

Less than Significant Impact.

The proposed Sub-Neighborhood Plan would allow development of up to 950 residential dwelling units, 40,000 square feet of retail and general commercial uses, open space, and public parks. As detailed in the Household Size Assumption Memo (**Appendix P**) by RCLCO in 2024, implementation of the proposed Sub-Neighborhood Plan is estimated to increase the City's population by

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24 RCLCO. *Household Size Assumptions for Proposed Maulhardt/Stiles NECSP Sub-Neighborhood Plan Project Memorandum*. 2024. **Appendix P**.

25 Correspondence between Aaron Baker, OFD Battalion Chief, and Victor Paitimusa, Project Manager, Meridian Consultants, on September 29, 2025.

26 Correspondence between Juan Morales, OPD Sergeant, Patrol Support Division, and Joe Pearson II, Planning and Environmental Services Manager, City of Oxnard, on August 15, 2025.

approximately 2,064 residents, which would result in an incremental increase in demand for fire protection services.

The OFD reviewed the proposed Project to determine whether new or expanded OFD facilities would be required to serve development under the proposed Sub-Neighborhood Plan.[27] As detailed in the Fire Service Letter, while the number of calls for service would increase as a result of the Project, the OFD can provide adequate service to the Project from its existing facilities and without new or expanded facilities.

The proposed Sub-Neighborhood Plan has been designed to comply with applicable City regulations, including the City's Fire Protection Guide, which ensures adequate ingress and egress for fire personnel and vehicles, and compliance with fire protection standards for fire sprinklers, hydrants, fire flow, hydrant spacing, and fire department connections. The Project Site would be served by a network of internal public and private roadways that connect to the surrounding arterial and collector street system. The Tentative Tract Map (**Appendix D**) illustrates primary vehicular access points, internal streets, and circulation patterns designed to accommodate local traffic, emergency vehicle access, pedestrians, and bicyclists. Sidewalks, crosswalks, and internal connections would provide safe and convenient circulation within the site and link to adjacent neighborhoods and facilities. Final roadway geometry, access locations, and circulation features would be refined during preparation of detailed improvement plans and would be subject to review and approval by the City. The tentative tract map also illustrates that a fire hydrant would follow City ordinances and have a fire hydrant within a 200-foot radius.

In addition, development under the proposed Sub-Neighborhood Plan would be subject to payment of the City's Growth Requirement Capital Fee, which requires new development to pay a fee per dwelling unit or per 1,000 square feet of non-residential floor area, for improvements that maintain adequate fire services including facilities, vehicles, equipment, and related infrastructure. Accordingly, with compliance with applicable City fire protection regulations and payment of the Growth Requirement Capital Fee, impacts related to fire protection services would be less than significant.

b. Would the project increase demand for law enforcement service such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?

Less than Significant Impact.

As discussed above, the proposed Sub-Neighborhood Plan would increase development and population within the City, resulting in a corresponding increase in demand for police protection services. The OPD reviewed the proposed Project to evaluate existing police protection services and

27 Correspondence between Aaron Baker, OFD Battalion Chief, and Victor Paitimusa, Project Manager, Meridian Consultants, on September 29, 2025.

determine whether new or expanded OPD facilities would be required to serve the Project.[28] Through correspondence with Chief of Police Jason Benites, OPD Beat 31, which provides law enforcement services to the Project Site, is currently capable of adequately meeting its emergency response time standard of under five minutes. Following review of the proposed Sub-Neighborhood Plan, OPD determined that while the proposed development would incrementally increase police service demand, OPD would not require new or expanded facilities to serve the Project Site.

The proposed Sub-Neighborhood Plan would be designed to comply with City standards and applicable police protection and public safety regulations to ensure adequate ingress and egress for police patrol and emergency response. The site plan includes multiple points of vehicular access, an interconnected internal roadway network, and public streets designed to meet City requirements for roadway width, connectivity, and turning movements sufficient to accommodate police vehicles. Final access locations, roadway geometry, and circulation details would be reviewed and approved by the City during subsequent improvement plan review to ensure continued compliance with police access and response requirements.

In addition, the proposed Project would be required to pay the City's Growth Requirement Capital Fee in accordance with the City's adopted fee program. The Growth Requirement Capital Fee is intended to fund capital improvements and facilities necessary to serve new development, including police facilities, vehicles, equipment, and related infrastructure. Payment of this fee ensures that the Project's incremental demand for police services is accounted for through the City's established funding mechanisms and that adequate police protection services would be available to serve the Project.

With compliance with City access and circulation standards, applicable police protection regulations, and payment of the Growth Requirement Capital Fee, the proposed Project would not require new or expanded police facilities beyond those already planned by the City. Accordingly, impacts related to police protection services would be less than significant.

c. Would the project increase demand for schools such that new or expanded facilities would be needed to maintain acceptable service levels, the construction of which may have significant environmental effects?

Less than Significant Impact.

The increase in population from the proposed Project is estimated at 2,064. Elementary and middle school services are provided to the Project Site by the RSD and high school services are provided to the Project Site by OUHSD.

28 Correspondence between Juan Morales, OPD Sergeant, Patrol Support Division, and Joe Pearson II, Planning and Environmental Services Manager, City of Oxnard, on August 15, 2025.

Table 4.15-1: School District Generation Rates and Student Generation summarizes the projected number of students that would be generated by the residential development that would be allowed by the proposed Sub-Neighborhood Plan. These projections are based on elementary and middle school student generation rates provided by the RSD and high school student generation rates provided by the OUHSD. [29,30]

As shown in **Table 4.15-1**, implementation of the proposed Sub-Neighborhood Plan is estimated to generate approximately 324 new students. In the RSD, the proposed Sub-Neighborhood Plan would generate an estimated 267 new students, including 181 elementary school students and 86 middle school students. The proposed Sub-Neighborhood Plan would also generate an estimated 57 high school students within OUHSD. While it is possible that some new residents and students may relocate from other areas within the RSD or OUHSD service boundaries, for conservative analysis purposes, this evaluation assumes all new students would represent additional enrollment within the respective districts.

TABLE 4.15-1: SCHOOL DISTRICT GENERATION RATES AND STUDENT GENERATION

School District	Maximum Projected Units	Grade Group	Student Generation Rates (students per dwelling unit)	Students Generated by the Project
Rio School District	950	K–5	0.19	181
	950	6–8	0.09	86
Oxnard Union High School District	950	9–12	0.06	57
			Total Students	**324**

Source: Rio School District, *Developer Fee Justification Report*, August 2022. Accessed at https://www.rioschools.org/business-services-developer-fees; and Oxnard Union High School District, *Fee Justification Report*, June 2024. Accessed at https://resources.finalsite.net/images/v1741630616/oxnardunionorg/oqkiaxc06yuiiybgn17u/OUHSDFeeJustificationReportJune2024.pdf.

Table 4.15-2: Project School Enrollment and Capacities compares the most recent available enrollment and capacity information for Rio Rosales Elementary School, Rio Del Valle Middle School and Del Sol High School with future enrollment number and capacity, including students generated by the proposed Sub-Neighborhood Plan. It is projected that the residential portion of the Project would be developed over approximately 6 years.

29 Rio School District. *Developer Fee Justification Report*. August 2022. Accessed January 2025. https://www.rioschools.org/business-services-developer-fees.

30 Oxnard Union High School District. *Fee Justification Report*. June 2024. Accessed January 2025. https://resources.finalsite.net/images/v1741630616/oxnardunionorg/oqkiaxc06yuiiybgn17u/OUHSDFeeJustificationReportJune2024.pdf.

TABLE 4.15-2: PROJECT SCHOOL ENROLLMENT AND CAPACITIES

School	Capacity	Current Enrollment	Current % of Capacity	Students Generated by Project	Projected Enrollment with Project	Projected % of Capacity
Rio Rosales Elementary School	560	548	98%	181	729	130%
Rio Del Valle Middle School	917	565	62%	86	651	71%
Del Sol High School	1,922	1,200	62%	57	1,257	65%

Source: Correspondence between Veronica Rauschenberger, RSD Executive Director, Joel Kirschenstein, Copresident of Sage Realty Group, and Victor Paitimusa, Project Manager, Meridian Consultants, on March 9, 2026; Correspondence between Thomas McCoy, Oxnard Union High School District Superintendent, and Victor Paitimusa, Project Manager, Meridian Consultants, on November 3, 2025.

As shown in **Table 4.15-2**, implementation of the proposed Sub-Neighborhood Plan would generate approximately 181 elementary school students, which would result in Rio Rosales Elementary School operating at approximately 130% capacity. The proposed Sub-Neighborhood Plan would add approximately 86 middle school students that would put Rio Del Valle Middle School at 71% capacity; and add approximately 57 high school students that would put Del Sol High School at 65% capacity.

The proposed Sub-Neighborhood Plan would place Rio Rosales Elementary School at over capacity with the proposed elementary school students generated by the proposed Project. RSD detailed that the other elementary schools within RSD's boundary—Rio Lindo, Rio del Norte, and Rio del Mar—are at full capacity and could not support the overflow from Rio Rosales Elementary School. It should also be noted that RSD calculates available seats based on program capacity, which reflects class size limits negotiated through the District's Collective Bargaining Agreement (CBA) as well as program requirements such as special education classrooms and other specialized instructional needs. As a result, not every physical classroom seat can be occupied at all times, and capacity estimates are based on program and CBA constraints rather than the number of physical desks within school facilities.[31]

In response, RSD is evaluating options to accommodate anticipated enrollment growth. One potential option under consideration is the construction of elementary school classroom buildings on available land at Rio del Valle Middle School. If implemented, this improvement would allow RSD to provide additional elementary school capacity to serve students generated by recently approved residential projects and the proposed Sub-Neighborhood Plan. Under this scenario, Rio del Valle Middle School could potentially transition from a middle school serving grades 6–8 to a K–8 school. Additionally, RSD is evaluating potential adjustments to school attendance boundaries to better

31 Correspondence between Veronica Rauschenberger, RSD Executive Director, Joel Kirschenstein, Copresident of Sage Realty Group, and Victor Paitimusa, Project Manager, Meridian Consultants, on March 9, 2026.

align student populations with available school facilities and ensure that residents are served by the schools located nearest to their homes.[32]

As described above, buildout of the residential portion of the Project is anticipated to occur gradually over approximately six years. As a result, the increase in students generated by the Project would occur incrementally rather than all at once, providing the RSD and OUHSD with sufficient time to monitor enrollment conditions and implement administrative or operational adjustments as needed. To the extent that temporary measures such as portable classrooms are considered to address short-term enrollment fluctuations, such measures would occur within existing school campuses and would not involve new school construction or off-site improvements. Should future enrollment conditions necessitate school facility expansion beyond administrative or temporary measures, such actions would be subject to separate planning and environmental review by the applicable school district.

Additionally, the proposed Sub-Neighborhood Plan would comply with the State-mandated school impact fees under SB 50, which is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization. School impact fees would ensure that impacted schools would have adequate equipment, programs, and facilities to adequately serve the generated students of the proposed Sub-Neighborhood Plan. Accordingly, although the Project would contribute to increased enrollment at Rio Rosales Elementary School, it would not require construction of new or expanded school facilities that could result in significant environmental effects. Impacts related to schools would therefore be less than significant.

a. Would the project increase the use of existing park facilities such that substantial physical deterioration of the facilities would occur or be accelerated or that new or expanded park facilities would be needed to maintain acceptable service levels?

Less than Significant Impact.

The City currently owns and manages 53 parks covering approximately 416 acres.[33] The City's 2025 population is estimated to be 198,733 persons.[34] Therefore, the City's parks service levels are 2.09 acres per 1,000 residents. The City's standard for parkland services is 3 acres of parkland per 1,000 residents.

With implementation of the proposed Sub-Neighborhood Plan, the City's overall parkland inventory would increase by approximately 11.27 acres, while the City's population would increase by

32 Correspondence between Veronica Rauschenberger, RSD Executive Director, Joel Kirschenstein, Copresident of Sage Realty Group, and Victor Paitimusa, Project Manager, Meridian Consultants, on March 9, 2026.

33 City of Oxnard. "Parks Division." Accessed January 2025. https://www.oxnard.gov/public-works/parks-division.

34 Department of Finance (DOF). "E-5 Population and Housing Estimates for Cities, Counties and the State, 2020–2025." Accessed May 2025. https://dof.ca.gov/Forecasting/Demographics/Estimates/estimates-e5-2010-2021/

approximately 2,064 residents. Based on these increases, the Citywide parkland service ratio would increase from approximately 2.09 acres per 1,000 residents under existing conditions to approximately 2.13 acres per 1,000 residents with Project implementation.[35] Therefore, in addition to meeting parkland needs generated by the Project, the proposed Sub-Neighborhood Plan would incrementally improve the City's overall parkland service ratio.

The proposed Sub-Neighborhood Plan would increase the population of the City by a maximum of approximately 2,064 people and would include the development of approximately 11.27 acres of parks that would consist of the proposed West Green Park, East Village Park extension, north neighborhood pocket parks, and Neighborhood Green Park. Therefore, the proposed Sub-Neighborhood Plan would have a parkland service ratio of 5.46 acres of parkland for every 1,000 residents, which would be higher than the City's parkland standard, resulting in less than significant impacts.

b. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact.

As detailed in the City's Parks and Recreation Master Plan, there are approximately 1,637 acres of park and recreational facilities which consist of City and County parks, beaches, and golf courses.[36] Therefore, with the existing 198,733 persons, the local and regional park and recreational facilities service level would be 8.24 acres per 1,000 residents, exceeding the parkland service level of 3 acres per 1,000 residents.

As discussed above, the proposed Sub-Neighborhood Plan provides approximately 11.27 acres of park land that would serve the residents of the Project Site. The proposed Sub-Neighborhood Plan would have a parkland ratio of 5.46 acres of parkland for every 1,000 residents, which would be higher than the City's parkland standard, resulting in less than significant impacts.

c. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact.

The proposed Sub-Neighborhood Plan would include the construction of new parks and recreational facilities as part of the Sub-Neighborhood Plan. These facilities would serve residents of the Project and surrounding community and are intended to meet City parkland standards. Construction of on-site recreational facilities would occur within the overall development footprint analyzed throughout

35 (416 + 11.27 acres) / (198,733 + 2,064 persons) x 1000 = (427.27) / (200,797) x 1,000 = 2.13 acres / 1,000 residents

36 City of Oxnard. *Parks & Recreation Master Plan*. February 2021. Accessed January 2025. https://www.oxnard.gov/wp-content/uploads/Oxnard-Parks-Recreation-Master-Plan-February-2021.pdf.

this Draft EIR and would not require additional grading or off-site improvements beyond those analyzed for the proposed Sub-Neighborhood Plan.

The physical environmental effects associated with development of the proposed recreational facilities (e.g., grading, lighting, noise, and landscaping) are addressed throughout this DEIR. The on-site park facilities would not, in themselves, cause additional or unique environmental impacts beyond those identified for the overall Project. Therefore, while the proposed Project includes new recreational facilities, their construction and operation would not result in any additional adverse physical effects on the environment beyond those evaluated for the proposed Project.

d. Would the project increase the need for or use of existing library or other community facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less than Significant Impact.

According to the American Library Association (ALA), the minimum standard for public library space is 1.0 square feet per resident in the library's service area.[37] The City's most updated population from 2025 is estimated at 198,733 persons and the OPL department has approximately 95,560 square feet of library space, resulting in 0.48 square feet per resident.

The increase in population from the proposed Project is estimated at 2,064. Using the ALA standard of 1.0 square feet per resident and considering the proposed Project's estimated addition of 2,064 residents, the ratio of library square feet per resident would continue to be approximately 0.48 square feet per resident. With respect to the proposed Project's general commercial uses that would introduce new employees, the employees are anticipated to come from the Project region and substantial usage of public facilities is not anticipated to occur.

The proposed Project would result in a minimal change in the ratio of library square footage per resident. Based on existing conditions, the City currently provides approximately 0.48 square feet of library space per resident. With implementation of the proposed Project, the service population would increase to approximately 200,797 residents, resulting in a ratio of approximately 0.48 (0.476) square feet per resident. This represents a decrease of less than 0.1% compared to existing conditions. This nominal reduction would not constitute a substantial increase in demand such that it would result in the physical deterioration of existing library facilities or require the construction of new or expanded facilities. Additionally, the proposed Project would be subject to the City's Growth Requirement Capital Fee, which is imposed on residential and non-residential developments to fund

37 Brawner, Lee B., Donald L., Jr. "Determining Your Public Library's Future Size: A Needs Assessment and Planning Model." *Institute of Education Sciences*. 1996. Accessed January 2025. https://eric.ed.gov/?id=ED392455&utm_.

the expansion of essential public facilities such as libraries to meet adequate service levels.[38] Therefore, impacts regarding libraries would be less than significant.[39]

4.15.6 Cumulative Impacts

The City's 2030 General Plan EIR evaluated the potential for the 2030 General Plan to contribute significantly to cumulative impacts. The 2030 General Plan EIR concluded that implementation of the 2030 General Plan would increase the overall demand for public services, including law enforcement and fire protection, libraries, schools and parks and recreational facilities. The 2030 General Plan EIR concluded these impacts would be less than significant with implementation of policies and programs identified in the 2030 General Plan EIR. The City and other jurisdictions would continue to evaluate the levels of service needed and the funding sources available to meet increases in demand, and local planning to accommodate future growth will reduce cumulative impacts associated with the provision of services to a less than significant level.

As detailed above, the estimated population increase for the proposed Sub-Neighborhood Plan of 2,064 residents would incrementally increase demand on public services and recreational facilities. The Project would not require the expansion of existing facilities or construction of new facilities. Like the proposed Project, related projects would be reviewed by the City on an individual basis and would be required to comply with requirements, such as the State-mandated school impact fees and any development impact fees for parks, and library services in order to ensure adequate levels of service. Therefore, cumulative impacts would be less than significant.

4.15.7 Level of Significance Before Mitigation

Impacts would be less than significant without mitigation.

4.15.8 Mitigation Measures

No mitigation measures are required.

4.15.9 Level of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

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38 City of Oxnard. *AB 1600 and Five-Year Report for Development Impact and In-Lieu Fees*. June 30, 2023. Accessed January 2025. https://www.oxnard.gov/wp-content/uploads/2023.12.04-FY-22-23-AB1600-Report-FINAL-12.5.23.pdf.

39 Calculation of library service ratio: Existing ratio = 95,560 square feet / 198,733 residents = 0.48 square feet per resident. With Project = 95,560 square feet / 200,797 residents = 0.48 square feet per resident. Percent change calculation (0.481 – 0.476) / 0.481 = 1%.

4.16 TRANSPORTATION AND CIRCULATION

This section of the EIR evaluates the potential transportation and circulation impacts of the proposed Sub-Neighborhood Plan Project. This section incorporates information from a Vehicle Miles Traveled (VMT) Analysis (**Appendix Q**) and Traffic Analysis (**Appendix R)** prepared by Fehr & Peers for the proposed Project. During the Notice of Preparation (NOP) scoping period, a resident expressed concerns regarding potential increases in traffic congestion on surrounding roadways, including Rose Avenue and Camino Del Sol, associated with development of the proposed Project. These concerns are addressed in the transportation analysis below.

4.16.1 Existing Conditions

The Traffic Analysis (**Appendix R**) describes existing conditions for the surrounding street network and alternative transportation facilities, including public transit, bicycle, and pedestrian facilities, as described below.

Existing Street System

The existing transportation network within and adjacent to the Project Site is described below:

- **Rose Avenue** is a six-lane, north-south primary arterial. Its northern terminus is State Route 118, and its southern terminus is at East Pleasant Valley Road.
- **Camino Del Sol** is a four-lane, east-west secondary arterial. Its western terminus is Garfield Avenue, and its eastern terminus is Del Norte Boulevard. Camino Del Sol provides access to Del Sol High School, which opened in 2023, industrial land uses east of Rice Avenue, James Foster Middle School, RJ Frank Middle School, and the commercial corridor along Oxnard Boulevard.
- **Cesar Chavez Drive** is a two-lane, east-west neighborhood street. Its western terminus is Juanita Avenue, and its eastern terminus is Gibraltar Street. Cesar Chavez Drive forms the northern boundary of Planning Area A, with a single-family home subdivision located north of the street. The street provides access to Norman Brekke Elementary School and the adjacent Oxnard Historic Farm Park.
- **Jacinto Drive** is a two-lane, east-west local street. Its western terminus is Rose Avenue, and its eastern terminus is Paseo Ortega. It forms the boundary between Area A and Areas B and C. Besides providing access to the Project Site, Jacinto Drive provides access to East Village Park and Rio Rosales Elementary School.
- **Jaguar Way** is a two-lane roadway along the east edge of Del Sol High School. Its northern terminus is Jacinto Drive, and its southern terminus is Camino Del Sol. Jaguar Way provides right-in, right-out access at Camino Del Sol.

Alternative Transportation

Existing Public Transit Service

Gold Coast Transit District (GCTD) bus routes 2 (Colonia-Downtown Oxnard) and 4 (North Oxnard) serve the Project Site. Route 2 and Route 4 have transit stops located at the intersection of Rose

Avenue and Camino Del Sol, with Route 2 having an additional stop at the intersection of Colonia Road and Camino Del Sol within the vicinity of the Project Site. Route 2 travels from the Oxnard Transit Center (OTC) through the Colonia and Rose Park communities every 40–45 minutes, with transfers at the OTC to the following routes: 4, 5, 6, 8, 18 and 19. Route 4 travels from the OTC towards Rose Avenue and Gonzales Road to the northern communities of Oxnard on F Street every 45 minutes, with transfers at the OTC to the following routes: 1, 2, 3, 5, 6, 18 and 19.

Regional transit is provided via the Metrolink Ventura County and Amtrak Pacific Surfliner rail lines, available at the OTC, which is located approximately 1.8 miles southwest of the Project Site.

As part of the development of Del Sol High School in Area B within the Project Site, the City established required roadway and transit improvements along Rose Avenue through Agreement No. A-8333 to serve the high school as well as the planned residential and commercial development in Areas A and C. The agreement identified the locations of GCTD bus stops and required installation of transit and roadway improvements, with responsibility assigned to the first project to proceed with construction. Because Del Sol High School was constructed first, the required improvements, including bus stops specified in Agreement No. A-8333 (Conditions 56–60), were implemented and are considered adequate to serve both the high school and the proposed Sub-Neighborhood Plan. These improvements constructed as part of the high school project include:

1. **Reconstruction and Relocation of Existing Bus Stop**
   - The northbound bus stop along Rose Avenue adjacent to Del Sol Park was removed to allow Rose Avenue to be widened.
   - Bus stop furnishings (signage, shelter, bench, trash receptacle, bike rack) were relocated to the newly approved pull-out at the northeast corner of Rose Avenue and Camino Del Sol.
2. **New Northbound Bus Stop at Camino Del Sol (NE Corner)**
   - A bus pull-out lane and concrete pad were constructed.
   - A bus shelter with solar lighting, signage, bench, trash receptacle, and bicycle rack was constructed to replace the Del Sol Park bus stop.
3. **New Southbound Bus Stop at Camino de la Luna (SW Corner)**
   - A new curbside bus stop with concrete landing pad was constructed.
   - New bus stop sign, pole, bench, and trash receptacle were installed at this new bus stop.
4. **New Northbound Bus Stop at Jacinto Drive (NE Corner)**
   - A curbside bus stop with concrete landing pad, bus stop signage, bench, and trash receptacle was constructed.
5. **New Northbound Bus Stop at Cesar Chavez Drive (NE Corner)**
   - A curbside bus stop with concrete landing pad was installed.
   - The existing GCTD bus stop sign from the Rose and Socorro stop was relocated.

- A bench and trash receptacle were installed at this bus stop.

6. New Southbound Bus Stop at Cesar Chavez Drive (SW Corner)

- A curbside bus stop with concrete landing pad was installed.
- The existing GCTD bus stop sign from the Rose and Socorro stop was relocated.
- A bench and trash receptacle were installed at this bus stop.

These improvements, reviewed and approved by the City Traffic Engineer and GCTD, under Agreement No. A-8333 are complete. These improvements serve to enhance transit access along Rose Avenue and serve existing GCTD routes.

Existing Bicycle System

The City of Oxnard Bicycle and Pedestrian Facilities Master Plan identifies existing and proposed bicycle infrastructure within the City and defines bikeways using the following California Department of Transportation standard classifications:[1]

- Class I Bikeway: Typically called a "bike path" or "multi-use path," a Class I Bikeway provides for bicycle and other non-motorized travel on a paved right-of-way completely separated from any street or highway.
- Class II Bikeway: "Bike lane," a striped and stenciled lane for one-way travel on a street or highway.
- Class III Bikeway: "Bike route," shared use of a motor vehicle travel lane identified only by signage and/or markings.

Class II bike lanes are located on the following roadways in both directions:

- Rose Avenue, from the northern City limits to Camino Del Sol serving as a connection to the Class II bike lanes on Gonzales Road
- Camino Del Sol for the entire roadway extent which connects to the Oxnard Trail via sidewalks along the Camino Del Sol Community Garden
- Jacinto Drive between Rose Avenue and Jaguar Way.

Existing Pedestrian Facilities

Pedestrian facilities in and around the Project Site consist of sidewalks along Rose Avenue, Camino Del Sol, Cesar Chavez Drive, Jacinto Drive, and Jaguar Way. These facilities include sidewalks, curb ramps, crosswalks, and pedestrian (walk/don't walk) signals designed in compliance with the Americans with Disabilities Act (ADA). Currently, pedestrian facilities are only present on the west side street of Jaguar Way, north side of Cesar Chavez Drive, and south side of Jacinto Drive.

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1 City of Oxnard. *Bicycle and Pedestrian Master Plan*. February 2012. Accessed January 2026. https://www.oxnard.gov/wp-content/uploads/pdfs/departments/community-development/planning/oxnard-bpmp-final-plan_adopted-feb-2012.pdf.

Existing Level of Service

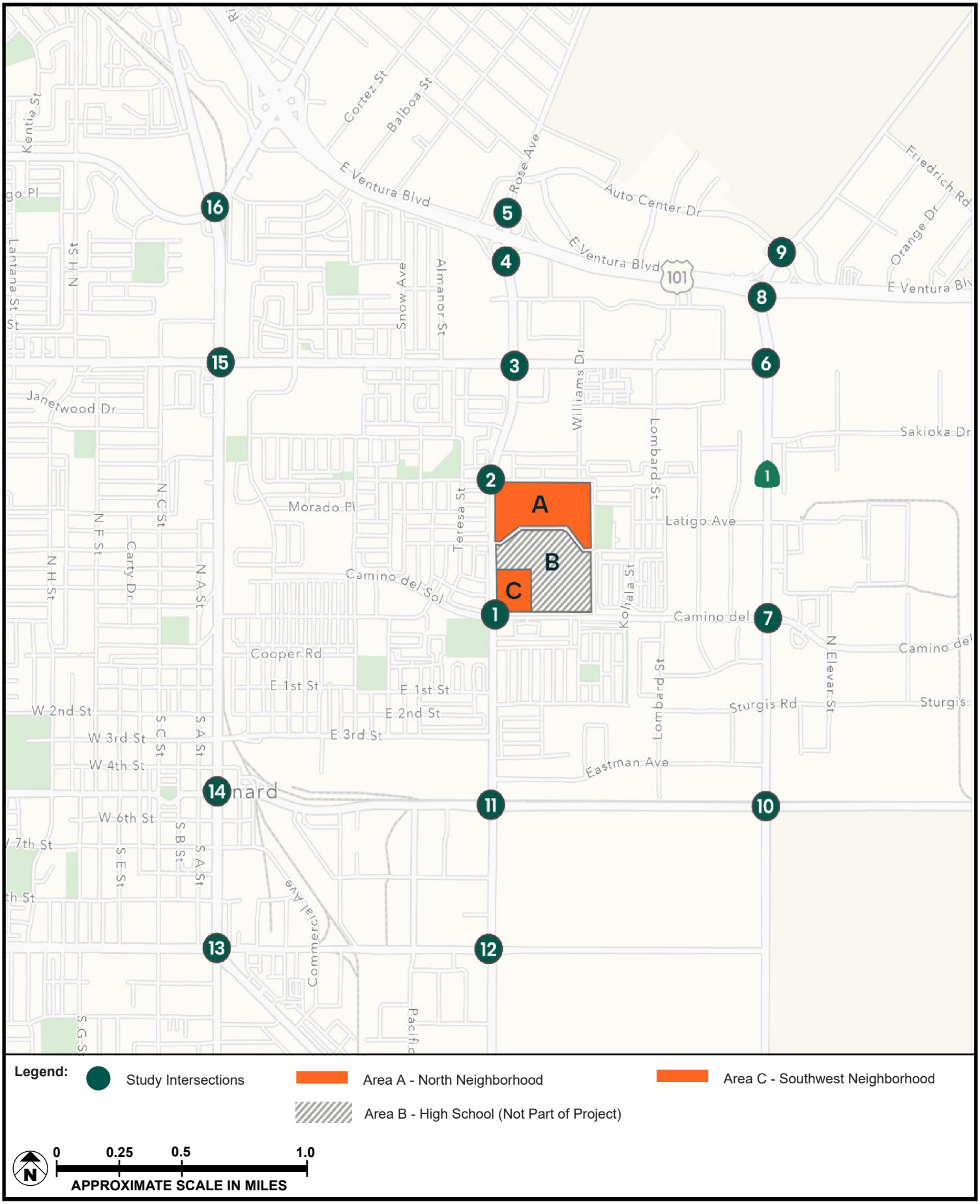
As described further below in *Section 4.16.3: Methodology*, the quality of traffic operations is characterized by the concept of Level of Service (LOS). LOS is defined by a range of grades from A (best) to F (worst). At intersections, LOS A represents relatively free flow operating conditions with little or no delay. LOS F is characterized by unstable flow conditions, severe congestion, and delay, with traffic volumes at or near the design capacity of an intersection.

The study area for the analysis includes the 16 signalized intersections (study intersections) in the vicinity of the Project Site shown in **Figure 4.16-1: Study Intersections**. These intersections were selected by the City Traffic Engineer for analysis as locations that could potentially be affected by the addition of traffic generated by the Project.

- Rose Avenue and Camino Del Sol
- Rose Avenue and Cesar Chavez Drive
- Rose Avenue and Gonzales Road
- Rose Avenue and US-101 SB Off-Ramp
- Rose Avenue and US-101 NB Off-Ramp
- Rice Avenue/SR-1 and Gonzales Road
- Rice Avenue/SR-1 and Camino Del Sol
- Rice Avenue/SR-1 and US-101 SB Off-Ramp
- Santa Clara Avenue and Auto Center Drive/US-101 NB Off-Ramp
- Rice Avenue/SR-1 and 5th Street
- Rose Avenue and 5th Street
- Rose Avenue and Wooley Road
- Oxnard Boulevard and Wooley Road/Saviers Road
- Oxnard Boulevard and 5th Street
- Oxnard Boulevard and Gonzales Road
- Oxnard Boulevard and Vineyard Avenue

The Oxnard General Plan Circulation Element identifies LOS C or better acceptable for intersection operations, except for the following 5 major intersections, which have the LOS standards identified below.

- C Street and Wooley Road – LOS D (not a study intersection)
- Oxnard Boulevard and Vineyard Avenue – LOS D (study intersection 16)
- Oxnard Boulevard and Gonzales Road – LOS D (study intersection 15)



SOURCE: Fehr & Peers - 2025.

FIGURE **4.16-1**

Meridian Consultants

Study Intersections

408-001-24

- Rose Avenue and Gonzales Road – LOS D (study intersection 3)
- Five Points (Oxnard Boulevard/Saviers Road/Wooley Road – LOS F (study intersection 13)

Existing traffic counts at the study intersections were collected in April 2025 during the AM and PM peak periods (6:30 – 8:30 AM, 4:00 – 6:00 PM). The traffic operations analysis is based on the highest single hour of traffic during each time period at each location. Detailed vehicle turning movement data is included in Appendix A of the Traffic Analysis (**Appendix R**).

Table 4.16-1: 2025 Existing Level of Service identifies the existing LOS for the study intersections using the Highway Capacity Manual (HCM) methodology.

TABLE 4.16-1: 2025 EXISTING LEVEL OF SERVICE

Study Intersection No.	Intersection	AM Peak Hour		PM Peak Hour	
		Delay (seconds/ vehicle)	LOS	Delay (seconds/ vehicle)	LOS
1	**Rose Avenue and Camino Del Sol**	54	**D**	36	**D**
2	**Rose Avenue and Cesar Chavez Drive**	39	**D**	22	C
3	**Rose Avenue and Gonzales Road**	51	**D**	54	**D**
4	**Rose Avenue and US-101 Southbound Off-Ramp**	18	B	26	C
5	**Rose Avenue and US-101 Northbound Off-Ramp**	14	B	14	B
6	**Rice Avenue and Gonzales Road**	28	C	33	C
7	**Rice Avenue and Camino Del Sol**	19	B	23	C
8	**Rice Avenue and US-101 Southbound Off-Ramp**	11	B	17	B
9	**Santa Clara Avenue and Auto Center Drive/ US-101 Northbound Off-Ramp**	19	B	23	C
10	**Rice Avenue and 5th Street**	36	**D**	49	**D**
11	**Rose Avenue and 5th Street**	44	**D**	50	**D**
12	**Rose Avenue and Wooley Road**	40	**D**	42	**D**
13	**Oxnard Boulevard and Wooley Road/Saviers Road**	105	**F**	139	**F**
14	**Oxnard Boulevard and 5th Street**	23	C	26	C
15	**Oxnard Boulevard and Gonzales Road**	51	**D**	52	**D**
16	**Oxnard Boulevard and Vineyard Avenue**	50	**D**	50	**D**

Notes: LOS based on Highway Capacity Manual methodology.

Source: Fehr & Peers. Maulhardt-Stiles Sub-Neighborhood Plan Traffic Analysis. Drafted April 1, 2026. See **Appendix R.**

Under existing conditions, the following intersections operate at LOS D or worse during the AM and/or peak hours:

1. Rose Avenue and Camino Del Sol (LOS D in AM and PM Peak Hours)

2. Rose Avenue and Cesar Chavez Drive (LOS D in AM Peak Hour)
3. Rose Avenue and Gonzales Road (LOS D in AM and PM Peak Hours)
10. Rice Avenue and 5th Street (LOS D in AM and PM Peak Hours)
11. Rose Avenue and 5th Street (LOS D in AM and PM Peak Hours)
12. Rose Avenue and Wooley Road (LOS D in AM and PM Peak Hours)
13. Oxnard Boulevard and Wooley Road/Saviers Road (LOS F in AM and PM Peak Hours)
15. Oxnard Boulevard and Gonzales Road (LOS D in AM and PM Peak Hours)
16. Oxnard Boulevard and Vineyard Avenue (LOS D in AM and PM Peak Hours)

The capacity of the following locations is affected by Metrolink Ventura County and Amtrak Pacific Surfliner rail operations.

10. Rice Avenue and 5th Street
11. Rose Avenue and 5th Street
15. Oxnard Boulevard and Gonzales Road
16. Oxnard Boulevard and Vineyard Avenue

These four locations are affected by the rail line gate down time that occurs in the AM/PM peak commute hours. With the close proximity of the existing railroad tracks, motorists may experience additional delay associated with the railroad pre-emption.

4.16.2 Regulatory Framework

Federal

There are no federal policies or regulations pertaining to transportation and circulation that are applicable to the proposed Project.

State

Senate Bill 743

The purpose of Senate Bill (SB) 743, which became effective on January 1, 2014, is to streamline the review under CEQA for several categories of development projects, including infill projects in transit priority areas, and to balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

SB 743 changed the metrics for determining impacts resulting from traffic. Formerly, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, known as LOS. As a result of SB 743, the focus of transportation analysis shifted from driver delay to reduction in VMT. The State's goal is to encourage land use and

transportation decisions that reduce greenhouse gas emissions, encourage infill development, and improve public health through active transportation.

The California Office of Planning and Research (OPR) has identified guidelines for projects, which may be screened and would therefore be exempt from a VMT analysis.[2]

Screening Criteria

- Retail projects up to 50,000 SF in floor area
- Projects generating less than 110 daily trips
- Residential and office projects located in low VMT areas. Low VMT is defined as 10% below the subarea VMT metrics for that area.
- Projects within a Transit Priority Area (TPA). A TPA is defined as locations within 0.5 mile of a major transit stop or station (e.g., Gold Line or Metrolink), or within 0.5 mile of a high-quality transit corridor with a 15-minute or less headways during peak commute hours.
- Affordable housing developments or affordable housing units within mixed-used developments.
- Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks, such as transit, bicycle and pedestrian facilities, intersections traffic control or widening at intersections to provide new turn lanes.

Public Resources Code Section 21099

SB 743 also added Section 21099 to the CEQA statute. Public Resources Code (PRC) Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment.

"Transit priority area" means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan. PRC Section 21099 establishes criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.

More specifically, High Quality TPAs (HQTPAs) are defined as areas within one-half mile of a major transit stop that are existing or planned where a "major transit stop" is a "site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods" as defined in PRC Section 21064.3.

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2 State of California, Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018. Accessed January 2026. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach greenhouse gas emissions (GHG) emissions goals by directing the California Air Resources Board to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations.

Assembly Bill 1358

Assembly Bill (AB) 1358, the Complete Streets Act of 2008, requires that cities and counties identify how they will provide for the routine accommodation of all users of roadways, including motorists, pedestrians, bicyclists, individuals with disabilities, seniors, and users of public transportation. Planning and building complete streets are one way that cities and counties can meet this requirement. A complete street is a transportation facility that is planned, designed, operated, and maintained to enable safe access for all roadway users. Pedestrians, bicyclists, motorists, and transit riders of all ages and abilities must be able to safely move along and across a complete street.

Regional

Southern California Association of Governments: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

In compliance with SB 375, every four years the Southern California Association of Governments (SCAG) updates its Regional Transportation Plan for the 191-city SCAG region. In September 2020, SCAG's Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) also known as Connect SoCal. Connect SoCal is a long-range visioning plan for the region's transportation system over the next 25 years that balances mobility and housing needs with economic, environmental, and public health goals. Connect SoCal includes over 4,000 transportation projects ranging from highway improvements, railroad grade-separations, bicycle lanes, new transit hubs, and replacement bridges to reduce bottlenecks, improve the efficiency of the region's network and expand the mobility choices for everyone in the six-county southern California region.[3]

Connect SoCal groups its goals into four core categories—economy, mobility, environment, and healthy/complete communities. The plan explicitly addresses goals associated with housing, transportation technologies, equity, and resilience reflecting enhanced importance of these topics in the region linking them to potential performance measures and targets.[4]

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3 Southern California Association of Governments (SCAG). *Final Connect SoCal 2024*. Adopted April 4, 2024. https://scag.ca.gov/connect-socal.

4 SCAG. *Final Connect SoCal 2024*.

Local

City of Oxnard General Plan

The City's 2030 General Plan establishes the long-range framework for the City's circulation system, including goals and policies related to roadway capacity, multimodal mobility, transit service, bicycling, and pedestrian connectivity. The Circulation Element identifies the City's roadway hierarchy, identifies the City's LOS standards for intersections, and emphasizes expanding non-automobile travel options such as transit, bicycles, walking, and other micro-mobility options. The General Plan also highlights the City's growing transit network, regional rail connections, and the need to close gaps in bicycle and pedestrian infrastructure to support a more sustainable, interconnected mobility system.[5]

Northeast Community Specific Plan (NECSP)

The NECSP establishes a circulation framework focused on creating an interconnected street system, improving multimodal mobility, and supporting safe, efficient travel throughout the community. The NECSP emphasizes a hierarchy of arterial, collector, and local streets; the integration of pedestrian and bicycle facilities; and coordinated infrastructure phasing to ensure adequate roadway capacity as development proceeds. The plan also calls for transit accessibility, neighborhood connectivity, and design features that encourage walking and biking as alternatives to vehicle travel.[6]

City of Oxnard Bicycle and Pedestrian Master Plan

The Bicycle and Pedestrian Facilities Master Plan provides a broad vision, strategies, and actions for the enhancement of bicycling and walking in the City. The purpose of this plan is to expand the existing bicycle and pedestrian networks, close gaps, address constrained areas, provide greater connectivity, educate, encourage, and maximize funding sources.[7]

4.16.3 Significance Thresholds

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

d) Would the project result in inadequate emergency access?

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5 City of Oxnard. *2030 General Plan Goals & Policies*. Adopted October 2011. Accessed January 2026. https://www.oxnard.gov/wp-content/uploads/2023/10/Oxnard-2030-General-Plan-Amend-12.2022-SMda.pdf.

6 City of Oxnard. *Northeast Community Specific Plan*. December 1993. Accessed January 2026. https://www.oxnard.gov/wp-content/uploads/NECSP3.pdf.

7 City of Oxnard. *Bicycle and Pedestrian Facilities Master Plan*.

4.16.4 Methodology

The City's CEQA guidelines require evaluation of proposed land-use projects to determine if the project would result in a substantial vehicle-miles traveled (VMT) impact. The City of Oxnard has developed recommendations for proposed project screening criteria, VMT metrics and thresholds of significance. The City's VMT methodology for land use projects and plans is consistent with the Technical Advisory on Evaluating Transportation Impacts in CEQA (California Governor's Office of Planning and Research (OPR), December 2018) for office, retail, and residential land uses.

Trip generation estimates for the Project were developed using the ITE *Trip Generation Manual*, 11th Edition. Trip generation related to housing utilized ITE Land Use Code 220 (Low-Rise Multifamily Housing) and was calculated on a per dwelling unit basis. Trip generation related to commercial/retail space utilized ITE Land Use Code 822 (Strip Retail Plaza < 40,000 SF) and was calculated on a per thousand-square foot (KSF) basis. Internal capture, pass-by trips, and walk/bike/transit adjustments were made to trip generation estimates. Internal capture represents the percentage of trips between land uses that occur within the site, which is necessary for a mixed-use development with multiple land uses. The internal capture adjustment was calculated using the MXD 2.0 trip generation tool developed by Fehr & Peers, which incorporates the research regarding prediction of trips from mixed-use projects. Pass-by trip adjustment is applied to account for the percentage of trips that would already be on the adjacent roadways but would make a stop at the Project Site. This adjustment was only applied to trips generated by commercial/retail space, as home-based trips begin or end at a residence with no pass-by stops. Walk/bike/transit trip adjustments were applied to account for the percentage of Project trips that are estimated to occur by walking, biking, or transit.

Intersection operations were analyzed using the Highway Capacity Manual (HCM) methodology as requested by the City Traffic Engineer. The HCM Level of Service definitions are provided in **Table 4.16-2: Intersection Level of Service Criteria** based on the Highway Capacity Manual, 7th Edition (2022).

TABLE 4.16-2: INTERSECTION LEVEL OF SERVICE CRITERIA

LOS	Description	Signalized Intersections (Delay: seconds/vehicle)
A	**Excellent**. No vehicle waits longer than one red light and no approach phase is fully used.	≤10.0
B	**Very Good**. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles	>10 and ≤20
C	**Good**. Occasionally drivers may have to wait through more than one red light; backups develop behind turning vehicles.	>20 and ≤35
D	**Fair**. Delays may be substantial during portions of the rush hours, but enough lower volumes periods occur to permit clearing of developing lines, preventing excessive backups.	>35 and ≤55

TABLE 4.16-2: INTERSECTION LEVEL OF SERVICE CRITERIA		
LOS	**Description**	**Signalized Intersections (Delay: seconds/vehicle)**
E	**Poor**. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	>55 and ≤80
F	**Failure**. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with increasing queue lengths.	>80

Source: National Academies of Sciences, Engineering, and Medicine, Transportation Research Board. *Highway Capacity Manual*. 2022.

4.16.5 Project Impacts

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than Significant.

Transit Facilities

As discussed above, several GCTD bus stops were constructed along Rose Avenue under Agreement No. A-8333 to enhance transit service in the vicinity of the proposed Sub-Neighborhood Plan based on the planned development of the Del Sol High School and the Project Site. These additional bus stops have been completed and provide accessible transit service to the Project Site and surrounding area, encouraging residents and visitors to utilize public transit. The proposed Sub-Neighborhood Plan incorporates these existing transit facilities and does not conflict with any program, plan, ordinance, or policy addressing transit.

Roadway Facilities

The Project Site has one existing internal road, Jacinto Drive, between Area A and Area B. As shown in **Figure 2-17: Thoroughfares**, the proposed Sub-Neighborhood Plan would establish an internal circulation network of neighborhood roads to provide access to the proposed development throughout the Project Site. To provide access to Area A, the proposed Sub-Neighborhood Plan would include new private streets extending perpendicular to the public rights-of-way along Cesar Chavez Drive, Gibraltar Street, and Jacinto Drive. Access to Area C would be provided by two new private streets extending perpendicular to Camino Del Sol and Rose Avenue. The proposed roadway network would improve local connectivity compared to existing conditions, where Areas A and C remain undeveloped and current travel requires vehicles to circulate around these areas. Development of the proposed Sub-Neighborhood Plan would establish new internal roadways that provide more direct routes through the site and enhance overall circulation within the surrounding street network.

The proposed circulation plan was reviewed by the City Traffic Engineer, and it was determined that the proposed roadways comply with the City of Oxnard standards and would have adequate site access for emergency vehicles.

As discussed above, the City's General Plan establishes a Level of Service (LOS) standard of C for all intersections, except those that currently operate at LOS D or worse. As shown in **Table 4.16-1**, several study intersections currently operate at LOS D or worse during the AM and/or PM peak hours.

Trip generation associated with the proposed Sub-Neighborhood Plan was estimated using the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, *11th Edition* and Fehr & Peers' MXD 2.0 trip generation tool for internal capture. Based on the maximum development that would be allowed by the proposed Neighborhood Plan of 950 residential units (ITE Land Use Code 220, Low-Rise Multifamily Housing) and 40,000 SF of commercial space (ITE Land Use Code 822, Strip Retail Plaza <40,000 SF), the proposed Sub-Neighborhood Plan is projected to generate approximately 374 trips during the AM peak hour and 535 trips during the PM peak hour.

The LOS at each study intersection with the addition of traffic from the Project is presented in **Table 4.16-3: Existing and Existing Plus Project Level of Service.** The following intersections are projected to operate at LOS D or worse in either the AM or PM peak hour with the addition of traffic from the Project:

1. Rose Avenue and Camino Del Sol (LOS E in AM Peak Hour and LOS D in the PM)
2. Rose Avenue and Cesar Chavez Drive (LOS D in AM Peak Hour)
3. Rose Avenue and Cesar Chavez Drive (LOS D in the AM Peak Hour and LOS E in the PM Peak Hour)
10. Rice Avenue and 5th Street (LOS D in AM and PM Peak Hours)
11. Rose Avenue and 5th Street (LOS D in AM and PM Peak Hours)
12. Rose Avenue and Wooley Road (LOS D in AM and PM Peak Hours)
13. Oxnard Boulevard and Wooley Road/Saviers Road (LOS F in AM and PM Peak Hours)
15. Oxnard Boulevard and Gonzales Road (LOS D in AM and PM Peak Hours)
16. Oxnard Boulevard and Vineyard Avenue (LOS D in AM and PM Peak Hours)

TABLE 4.16-3: EXISTING AND EXISTING PLUS PROJECT LEVEL OF SERVICE

ID	Intersection	Peak Hour	Existing (2025) Delay (s/veh)	Existing (2025) LOS	Existing Plus Project (2025) Delay (s/veh)	Existing Plus Project (2025) LOS
1	**Rose Avenue and Camino Del Sol**	AM	54	**D**	59	**E**
		PM	36	**D**	45	**D**
2	**Rose Avenue and Cesar Chavez Drive**	AM	39	**D**	42	**D**
		PM	22	C	29	C

TABLE 4.16-3: EXISTING AND EXISTING PLUS PROJECT LEVEL OF SERVICE

ID	Intersection	Peak Hour	Existing (2025) Delay (s/veh)	Existing (2025) LOS	Existing Plus Project (2025) Delay (s/veh)	Existing Plus Project (2025) LOS
3	Rose Avenue and Gonzales Road	AM	51	**D**	52	**D**
		PM	54	**D**	56	**E**
4	Rose Avenue and US-101 SB Off-Ramp	AM	18	B	18	B
		PM	26	C	27	C
5	Rose Avenue and US-101 NB Off-Ramp	AM	14	B	14	B
		PM	14	B	13	B
6	Rice Avenue and Gonzales Road	AM	28	C	30	C
		PM	33	C	35	C
7	Rice Avenue and Camino Del Sol	AM	19	B	19	B
		PM	23	C	23	C
8	Rice Avenue and US-101 SB Off-Ramp	AM	11	B	11	B
		PM	17	B	17	B
9	Santa Clara Avenue and Auto Center Dr/US-101 NB Off-Ramp	AM	19	B	19	B
		PM	23	C	24	C
10	Rice Avenue and 5th Street	AM	36	**D**	36	**D**
		PM	49	**D**	49	**D**
11	Rose Avenue and 5th Street	AM	44	**D**	45	**D**
		PM	50	**D**	51	**D**
12	Rose Avenue and Wooley Road	AM	40	**D**	40	**D**
		PM	42	**D**	43	**D**
13	Oxnard Boulevard and Wooley Road/Saviers Road	AM	105	**F**	106	**F**
		PM	139	**F**	141	**F**
14	Oxnard Boulevard and 5th Street	AM	23	C	24	C
		PM	26	C	27	C
15	Oxnard Boulevard and Gonzales Road	AM	51	**D**	51	**D**
		PM	52	**D**	53	**D**
16	Oxnard Boulevard and Vineyard Avenue	AM	50	**D**	50	**D**
		PM	50	**D**	50	**D**

Source: Fehr & Peers. *Maulhardt-Stiles Sub-Neighborhood Plan Traffic Analysis*. April 1, 2026 (see **Appendix R**).

The contribution of traffic from the Project to potential cumulative traffic conditions is presented in **Table 4.16-4: Cumulative Level of Service** presents LOS for projected cumulative traffic conditions without traffic from the Project (Cumulative Base scenario), which includes existing traffic volumes, ambient background growth, and traffic from approved or pending development projects when the proposed Project is fully operated in 2032. Under these future baseline conditions, several

intersections are projected to continue operating at LOS D or worse, without the addition of traffic from the Project.

As shown in **Table 4.16-4: Cumulative Level of Service,** the addition of traffic from the Project (Cumulative + Project condition) will not worsen LOS at any study intersection compared to the Cumulative Base scenario. As described in the Traffic Analysis, intersection operations were evaluated using standard Highway Capacity Manual methodologies, and optimized signal timing scenarios, including adjustments to cycle lengths and green-time splits, for intersections where operations could be improved.

The analysis determined that operating conditions at most of the study intersections would not be substantially improved by signal timing upgrades. The operating conditions at some intersections, however, can be improved to acceptable standards with optimized signal timing. LOS results with signal timing improvements are shown in **Table 4.16-4** below. The City routinely monitors operating conditions at signalized intersections in the City and adjusts signal timing as needed to optimize operating conditions.

TABLE 4.16-4: CUMULATIVE LEVEL OF SERVICE

ID	Intersection	Peak Hours	Cumulative Base (2025)		Cumulative + Project (2028)		Cumulative + Project + Signal Optimization (2028)		Cumulative + Project + Signal Optimization (2028) vs Cumulative Base (2025) LOS Comparison
			Delay (seconds/ vehicle)	LOS	Delay (seconds/ vehicle)	LOS	Delay (seconds/ vehicle)	LOS	
1	**Rose Avenue and Camino Del Sol**	AM	58	**E**	64	**E**	26	C	**Lower LOS to acceptable standards**
		PM	35	**D**	38	**D**	20	C	**Lower LOS to acceptable standards**
2	**Rose Avenue and Cesar Chavez Dr**	AM	37	**D**	41	**D**	41	**D**	Similar LOS
		PM	23	C	30	C	30	C	Similar LOS
3	**Rose Avenue and Gonzales Road**	AM	56	**E**	57	**E**	57	**E**	Similar LOS
		PM	62	**E**	67	**E**	65	**E**	Similar LOS
4	**Rose Avenue and US-101 Southbound Off-Ramp**	AM	21	C	22	C	22	C	Similar LOS
		PM	26	C	30	C	30	C	Similar LOS
5	**Rose Avenue and US-101 Northbound Off-Ramp**	AM	15	B	15	B	15	B	Similar LOS
		PM	15	B	15	B	15	B	Similar LOS
6	**Rice Avenue and Gonzales Road**	AM	50	**D**	54	**D**	40	**D**	Similar LOS
		PM	40	**D**	42	**D**	40	**D**	Similar LOS

TABLE 4.16-4: CUMULATIVE LEVEL OF SERVICE

ID	Intersection	Peak Hours	Cumulative Base (2025)		Cumulative + Project (2028)		Cumulative + Project + Signal Optimization (2028)		Cumulative + Project + Signal Optimization (2028) vs Cumulative Base (2025) LOS Comparison
			Delay (seconds/ vehicle)	LOS	Delay (seconds/ vehicle)	LOS	Delay (seconds/ vehicle)	LOS	
7	Rice Avenue and Camino Del Sol	AM	27	C	27	C	25	C	Similar LOS
		PM	32	C	33	C	33	C	Similar LOS
8	Rice Avenue and US-101 Southbound Off-Ramp	AM	13	B	13	B	12	B	Similar LOS
		PM	19	B	19	B	18	B	Similar LOS
9	Santa Clara Avenue and US-101 Northbound Off-Ramp	AM	26	C	26	C	26	C	Similar LOS
		PM	28	C	30	C	29	C	Similar LOS
10	Rice Avenue and 5th Street	AM	71	**E**	73	**E**	67	**E**	Similar LOS
		PM	71	**E**	74	**E**	66	**E**	Similar LOS
11	Rose Avenue and 5th Street	AM	83	**F**	83	**F**	79	**E**	**Lower LOS**[1]
		PM	94	**F**	95	**F**	78	**E**	**Lower LOS**[1]
12	Rose Avenue and Wooley Road	AM	46	**D**	47	**D**	42	**D**	Similar LOS
		PM	48	**D**	49	**D**	45	**D**	Similar LOS
13	Oxnard Boulevard and Wooley Road/Saviers Road	AM	144	**F**	147	**F**	145	**F**	Similar LOS
		PM	168	**F**	171	**F**	152	**F**	Similar LOS
14	Oxnard Boulevard and 5th Street	AM	32	C	33	C	32	C	Similar LOS
		PM	52	**D**	55	**D**	43	**D**	Similar LOS
15	Oxnard Boulevard and Gonzales Road	AM	60	**E**	60	**E**	59	**E**	Similar LOS
		PM	61	**E**	61	**E**	59	**E**	Similar LOS
16	Oxnard Boulevard and Vineyard Avenue	AM	60	**E**	60	**E**	60	**E**	Similar LOS
		PM	66	**E**	66	**E**	61	**E**	Similar LOS

Note:
1: Intersection currently operating below City's desired LOS standard. Improvements to be made with Project would improve the operating conditions of this intersection, but not to the City's desired LOS standard.

Source: Fehr & Peers. Maulhardt-Stiles Sub-Neighborhood Plan Traffic Analysis. April 1, 2026 (see **Appendix R**).

Analysis of Operational Improvements

In addition to the LOS analysis, the Traffic Analysis includes evaluation of left-turn movements at several study intersections identified by City staff. Left-turn queues were analyzed at the following four intersections which currently operate at LOS D:

- Rose Avenue and Gonzales Road (Intersection 3)
- Oxnard Boulevard and Wooley Road/Saviers Road (Intersection 13)
- Oxnard Boulevard and Gonzales Road (Intersection 15)
- Oxnard Boulevard and Vineyard Avenue (Intersection 16)

The additional traffic from the Project did not degrade the projected cumulative traffic conditions at these intersections as shown in Table 3-4: Cumulative Base, Cumulative with Project and Cumulative Plus Project and Signal Optimization LOS, of the Traffic Analysis. The City regularly monitors operating conditions at all signalized intersections and adjusts signal timing as needed to optimize operating conditions.

Left-turn queues were evaluated at the following four additional intersections where the Project would contribute more than 10% of left-turn volumes:

- Rose Avenue and Camino Del Sol (Intersection 1)
- Rose Avenue and Cesar Chavez Drive (Intersection 2)
- Rice Avenue and Camino Del Sol (Intersection 7)
- Rice Avenue and 5th Street (Intersection 10)

The analysis evaluated 95th percentile queue lengths to determine whether vehicle queues would exceed available storage capacity within designated left-turn pockets. Results indicate that the existing left turn lanes have sufficient turn capacity to accommodate existing and Project traffic. Improvements were being made to Rose Avenue and Camino Del Sol in 2025 when traffic counts were being collected. As of 2026, these improvements have been completed, including dual left turn lanes on all approaches with sufficient capacity to accommodate projected turn movements.

Eastbound and westbound left turns are permissive at the intersection of Rose Avenue and Cesar Chavez Drive while the left-turn volumes are relatively high, the Project will minimally increase westbound left-turn volumes. The need for protected left turns was analyzed for the eastbound and westbound approaches due to the following considerations:

- The Project would add land uses, such as parks and retail commercial uses, which could increase pedestrian/bike activity at this intersection
- Cesar Chavez Drive features a “sharrowed” bike route, which connects users to the bike lanes on Rose Avenue
- This intersection features two bus stops, which attract pedestrian activity. There are also nearby destinations including a park and an elementary and high school
- The nearby intersection of Rose Avenue and Jacinto Drive/Camino De La Luna has protected east- and westbound left turns

This analysis determined that adding protected left turn lanes for the east- and westbound movements would improve the separation of vehicles, pedestrians, and cyclists. The Project will include modifications to this signalized intersection to add two signal phases to protect left turn lanes for the east- and westbound turn movements.

Bicycle Facilities

The City's Bicycle and Pedestrian Facilities Master Plan identifies existing and planned bicycle and pedestrian facilities throughout the City. The plan's primary goal is to make bicycling and walking integral modes of transportation by creating a safe, interconnected network of routes and pathways. To achieve this, the plan recommends targeted improvements to address existing gaps and barriers in the network and to ensure that new developments incorporate bicycle and pedestrian connections. Specifically, the plan would like to develop more Class I, II, and III bike facilities throughout the City.[8]

As discussed above, the nearest existing bicycle facilities to the Project Site are the Class II bike lanes along Rose Avenue, Camino Del Sol, and Jacinto Drive. There are currently no bicycle facilities within Areas A and C, and due to the undeveloped nature of these areas, bicyclists must travel around the Project Site or along Jacinto Drive. As shown in **Figure 2-18: Pedestrian and Bike Network** in **Section 2.0: Project Description** of this Draft EIR, the proposed Sub-Neighborhood Plan would introduce new bicycle infrastructure, including Class I multi-use paths along Rose Avenue and Jacinto Drive, Class III bike routes along internal and adjacent roadways, and pedestrian- and bicycle-only paseos within Area A. Additionally, the proposed Sub-Neighborhood Plan would have Class III bike routes and sidewalks on both sides of the internal roads of Area C.

These improvements would establish new bicycle connections where none currently exist, enhance network continuity, and support the City's Bicycle and Pedestrian Facilities Master Plan goal of creating a safe and interconnected system of bicycle routes. The proposed bicycle facility improvements would also support the goals of the City's General Plan and NECSP by establishing new bicycle connections that encourage the use of alternative modes of transportation.

Pedestrian Facilities

As discussed above, the City's Bicycle and Pedestrian Facilities Master Plan identifies existing and planned pedestrian facilities throughout the City with the primary goal of making walking an integral mode of transportation by creating a safe, interconnected network of routes and pathways. To achieve this, the plan recommends identification of intersections and road segments that require improvement, ranging from the installation of sidewalks, signal re-timing or crosswalk implementation to pedestrian bridges or traffic calming measures.[9]

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8 City of Oxnard. *Bicycle and Pedestrian Facilities Master Plan*.

9 City of Oxnard. *Bicycle and Pedestrian Facilities Master Plan*.

Pedestrian facilities consisting of sidewalks are present along Rose Avenue, Camino Del Sol, Cesar Chavez Drive, Jacinto Drive, and Jaguar Way. These facilities include sidewalks, curb ramps, crosswalks, and pedestrian (walk/don't walk) signals. Under existing conditions, pedestrian facilities are only present on one side of the street for Jaguar Way (western side), Cesar Chavez Drive (northern side), and Jacinto Drive (southern side). As shown in **Figure 2-18: Pedestrian and Bike Network** in **Section 2.0: Project Description** of this Draft EIR, the proposed Sub-Neighborhood Plan would include new pedestrian improvements such as sidewalks along the south side of Cesar Chavez Drive and the north side of Jacinto Drive, new sidewalks on both sides of all proposed internal streets, multi-use paths along Rose Avenue and Jacinto Drive, pedestrian- and bicycle-only paseos within Area A, and sidewalks in Area C.

These improvements would establish new pedestrian connections where none currently exist, enhance network continuity, and support the City's Bicycle and Pedestrian Facilities Master Plan goal of creating a safe and interconnected system of pedestrian routes. The proposed pedestrian improvements would also support the goals of the City's General Plan and NECSP by establishing new pedestrian connections that encourage the use of alternative modes of transportation.

Parking

The proposed Sub-Neighborhood Plan would include on-site parking areas to serve the proposed residential and commercial land uses. Parking would be provided as required by applicable City Municipal Codes including computation of off-street parking spaces (Section 16-620); bicycle parking (Sections 16-623 and 16-637); motorcycle parking (Section 16-624); dimensional standards (Sections 16-636, 16-638, and 16-639); location requirements (Section 16-645); parking area and construction standards (Section 16-643); and off-street loading and unloading areas (Section 16-644). **Table 2-3: Parking Spaces Required** in **Section 2.0: Project Description** of this Draft EIR provides the parking spaces required for each residential and commercial building that may be developed as part of the proposed Sub-Neighborhood Plan. Proposed parking options for the Project would be incorporated as a private rear lot, private garage, surface parking, and structured parking.

General Plan Consistency

Table 4.16-5: Project Consistency with the City of Oxnard 2030 General Plan provides assessment of the consistency of the proposed Project with the applicable transportation goals and policies of the City's General Plan. According to the consistency procedure outlined in Chapter 9 of the 2030 General Plan, the City has a three-level procedure for determining consistency. The three levels are defined by the relationship between the 2030 General Plan goal and its representative implementing policies and the proposed Project. The three levels are:

I. Direct Applicability to the proposed Project

II. Related or Indirect Applicability to the Proposed Project

III. No or Distant Applicability to the Proposed Project

For Level I goals, the consistency standard is that the proposed Project furthers at least one of the goal's implementing policies and otherwise does not inhibit achievement of remaining policies. For Level II goals, the consistency standard is that the proposed Project shall not significantly inhibit achievement of the goal or its implementing policies. Level III policies are not included in **Table 4.16-5** as they are not applicable. Level I and Level II policies are included and are identified as either Level I or II in the narrative discussion.

TABLE 4.16-5: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

Chapter 2: Sustainable Communities	
Goal SC-1:	**Supporting and Participating in Global Warming and Climate Change Adaptation analysis and programs**
Policy SC-1.3 CEQA Level of Service Threshold. CEQA Level of Service Threshold. Require level of service "C" as the threshold of significance for intersections during environmental review.	**Level II - Consistent**. As discussed in the LOS analysis for Threshold a, several of the study intersections currently operate at LOS D or worse during AM and PM peak hours and are projected to operate at LOS D or worse under the Cumulative + Project scenario. The addition of traffic from the Project would not worsen LOS at any study intersection for Cumulative + Project Conditions. The LOS at all the study intersections would not worsen and would improve at some of the study intersections with signal optimization.
Chapter 3: Community Development	
Goal CD-1:	**A balanced community consisting of residential, commercial, and employment uses consistent with the character, capacity, and vision of the City.**
Policy CD-1.4 Transportation Choices. Promote the application of land use and community designs that provide residents with the opportunity for a variety of transportation choices (pedestrian, bicycle, transit, automobile).	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would allow for a variety of transportation choices that would further connect alternative modes of transportation throughout the Project Site and other portions of City, including the development of sidewalks, bike lanes/routes, multi-use trails, paseos, and additional GCTD bus stops.
Policy CD-1.9 Commute Reduction. Minimize the commuting distances between residential concentrations and employment centers by encouraging the development of mixed land uses in appropriate areas.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would provide housing near major employment centers such as Northeast Industrial Area District (NIAD) and the proposed commercial uses would also provide nearby employment areas near residences, resulting in shorter commute times to employment opportunities.
Goal CD-7:	**Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.**
Policy CD-7.4 Urban Village Design Guidelines. Develop Urban Village Design Guidelines that incorporate the following features, where appropriate: • Provide a variety of transportation choices and an interconnected multi-modal mobility network.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would allow for a variety of transportation choices that would further connect modes of transportation throughout the Project Site and other portions of City, including the development of streets, automobile parking, bicycle parking, sidewalks, bike lanes/routes, multi-use trails, paseos, and additional GCTD bus stops.

TABLE 4.16-5: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

Policy CD-7.5 Pedestrian and Transit Scale. Design urban village areas to be pedestrian-oriented and transit accessible, incorporating block patterns, walking routes and edges, social orientation of buildings, and streetscapes to provide ease of walking and safety.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would include pedestrian, bicycle and transit-oriented infrastructure with multi-use trails, paseos, sidewalks, bicycle lanes/routes, and GCTD bus stops within and along the Project Site. Wide sidewalks, well shaded with trees and lined with human-scaled street lighting provide a welcoming pedestrian experience. Lane widths for internal streets would be narrow to keep traffic speeds low, and therefore compatible with the presence of pedestrians and cyclists. Additionally, the proposed Sub-Neighborhood Plan would have residential serving commercial uses and parks throughout the Project Site accessible by bicycle and pedestrian linkages to encourage non-vehicular travel.
Policy CD-7.6 Connectivity. Provide connectivity to other activity nodes in the form of roadways, transit connections, and bicycle and pedestrian linkages that encourages non-vehicular travel modes. Urban villages should be considered major transit transfer points and have amenities oriented towards transit users.	
Policy CD-7.7 Urban Village Streetscapes and Identification. Include streetscape and signage programs in roadway improvements that provide each area a unique identification and enhance the functionality and beauty of entry corridors. Ensure that planned roadway improvements do not conflict with other policies that encourage pedestrian activities and circulation.	**Level I - Consistent**. Wide sidewalks, well shaded with trees and lined with human-scaled street lighting provide a welcoming pedestrian experience. Lane widths would be narrow to keep traffic speeds low, and therefore compatible with the presence of pedestrians and cyclists. All roadway and pedestrian improvements were reviewed by the City Traffic Engineer and will be built consistent with City standards.
Policy CD-7.8 Road Design. Reflect the residential and commercial activities of the urban village area by using appropriate roadway widths for road and streetscape design.	**Level I - Consistent**. Wide sidewalks, well shaded with trees and lined with human-scaled street lighting provide a welcoming pedestrian experience. Lane widths would be narrow to keep traffic speeds low, and therefore compatible with the presence of pedestrians and cyclists. Additionally, the proposed Sub-Neighborhood Plan would have residential serving commercial uses and parks throughout the Project Site accessible by bicycle and pedestrian linkages to encourage non-vehicular travel.
Policy CD-7.13 Urban Village Trail and Open Space Connections. Include trails (pedestrian and bicycle) and open space areas, where feasible within urban village areas. These facilities shall create a network that links urban villages and other neighborhoods to each other.	**Level I - Consistent**. As shown in **Figure 2-18: Pedestrian and Bike Network**, the proposed Sub-Neighborhood Plan incorporates pedestrian and bicycle trails that would connect to the surrounding sidewalks and bike lanes along North Rose Avenue, Camino Del Sol, Jacinto Drive, Cesar Chavez Drive, and Gibraltar Street.
Goal CD-8:	**Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.**
Policy CD-8.1 Limiting Development. Continue to limit development to those areas that can be served by existing or planned utilities, transportation, and service systems.	**Level II - Consistent**. As discussed in threshold b in this section below, the proposed Sub-Neighborhood would not result in significant LOS impacts and would adequately provide circulation for vehicles, pedestrians, and emergency personnel.
Policy CD-8.5 Impact Mitigation. Ensure that new development avoids or mitigates impacts on air quality,	**Level II – Consistent.** As detailed in Threshold c and d below, the construction of the proposed Project may

TABLE 4.16-5: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

traffic congestion, noise, and environmental resources to the maximum extent feasible.	require closure of lanes, however, with the implementation of a Construction Mitigation Plan under **MM TRANS-1**, there would be adequate circulation during construction. The proposed Project's circulation plan was reviewed by the City Traffic Engineer and was determined to be adequate under City development standards and for emergency circulation.
Policy CD-8.9 Jobs/Housing Balance & Sustainable Communities Strategy (SB 375). Incorporate inter- and intra-city jobs/housing balance in the development of the regional and subregional Sustainable Communities Strategy (SB 375), Urban Village strategy and strategic plans, with the main intent to reduce single-occupancy work-related vehicular trips.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan would provide new housing in proximity to the NIAD and proposed commercial uses, creating a mix of land uses that supports internal trip capture and reduces the need for external vehicle trips. The Project would also enhance pedestrian, bicycle, and transit connectivity, offering alternative transportation options that reduce reliance on single-occupancy vehicles for work-related and local trips.
Chapter 4: Infrastructure and Community Services	
Goal ICS-1:	**Provision of adequate facilities and services that maintain service levels, with adequate funding.**
Policy ICS-1.2 Maintain Existing Service Levels. Maintain the high priority of providing services to residents and visitors, and prevent deterioration of existing service levels.	**Level II - Consistent**. As detailed in the LOS analysis in Threshold a, the proposed Sub-Neighborhood Plan would not worsen LOS in the area compared to the Cumulative Base. With signal optimization, some intersections would have improved LOS.
Goal ICS-2:	**A transportation system that supports existing, approved, and planned land uses throughout the City while maintaining a level of service "C" at designated intersections unless excepted.**
Policy ICS-2.6 Reduction of Construction Impacts. Minimize and monitor traffic and parking issues associated with construction activities require additional traffic lanes and/or other traffic improvements for ingress and egress for new developments for traffic and safety reason, where appropriate.	**Level II - Consistent**. As detailed in Threshold c and d below, the construction of the proposed Project may require closure of lanes, however, with the implementation of a Construction Mitigation Plan under **MM TRANS-1**, there would be adequate circulation during construction. The proposed Project's circulation plan was reviewed by the City Traffic Engineer and was determined to be adequate under City development standards and for emergency circulation.
Policy ICS-2.7 Consistent Roadway Signage. Continue to improve roadway signage Citywide to ensure that: 1) signage is accurate and not obscured or obstructed by vegetation or structures; 2) worded transportation signs are consistent and uniform; 3) type face is uniform; 4) graphic symbols are consistent; 5) sign size is modular; 6) signs are grouped to reduce visual clutter wherever possible; and 7) traffic-control devices, lighting, and related items are on common poles where feasible.	**Level II - Consistent**. Development allowed by the Sub-Neighborhood Plan would be required to adhere to streetscape design as defined by the 2030 General Plan, including these several signage policies. All future development within the proposed Sub-Neighborhood Plan must be approved by the City prior to building permits.
Policy ICS-2.8 Intelligent Transportation Systems. Implement the adopted Intelligent Transportation Systems (ITS), as well as other appropriate communication technologies, to improve flow of traffic, where feasible.	**Level II - Consistent.** This policy applies to actions to be taken by the City to improve the operation of the City's street system. The proposed Project would incorporate

TABLE 4.16-5: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

	traffic signal optimization improvements to improve traffic congestion.
Policy ICS-2.12 Gateway Enhancements. Continue to enhance gateways (including but not limited to Ventura Road, Oxnard Boulevard, Vineyard Avenue, Rose Avenue, Rice Avenue, Del Norte Boulevard, Highway-101, Highway 1, Fifth Street, Channel Islands Boulevard, Pleasant Valley Road, Harbor Boulevard, Victoria Avenue, and Hueneme Road).	**Level II - Consistent**. The proposed Sub-Neighborhood Plan would provide a multi-use path, landscaping, and sidewalks along Rose Avenue, providing additional transportation enhancements.
Policy ICS-3.4 Roadway Design/101 Freeway Capacity. Review the potential addition of auxiliary lanes or lane expansion to increase roadway width and number of lanes, where feasible, in order to mitigate traffic congestion and improve level of service.	**Level II - Consistent**. The proposed Project would not expand or increase number of traffic lanes. As detailed in the Traffic Analysis determined that no feasible physical improvements were identified (due to a lack of available right of way) for any of the locations operating at LOS D or worse.
Goal ICS-4:	**A functional and balanced goods movement system that provides timely and efficient transport of goods generated by the Port of Hueneme and agricultural, industrial, and commercial areas.**
Policy ICS-4.5 Loading and Unloading. Enforce truck loading and unloading regulations in commercial and industrial areas and those adjacent to residential land uses.	**Level II - Consistent**. All truck loading and unloading would be required to adhere to City Municipal Code Section 8-50 to ensure that trucks would load and unload only in loading areas and alleys for designated times and days.
Goal ICS-6:	**Public transit system that serves the needs of the residents and workers of Oxnard.**
Policy ICS-6.1 Transit Facilities for New Developments. Include transit facilities such as bus benches, shelters, pads or turnouts, where appropriate, in new development improvement plans.	**Level I – Consistent.** Agreement No. A-8333 was approved to provide additional GCTD transit facilities for the proposed Sub-Neighborhood Plan including new bus stops, bus turnouts, and shelters. This would ensure that there are adequate transit facilities that would serve the proposed development.
Goal ICS-7:	**Effective Transportation Demand Management (TDM) programs that help achieve air quality goals and minimize congestion.**
Policy ICS 7.3 Reduce Single-Occupancy Automobile Dependency. Reduce single-occupancy automobile use and increase the use of alternative forms of transportation as a means of reducing energy consumption and vehicle emissions.	**Level I - Consistent**. The proposed Sub-Neighborhood Plan was planned to be developed near employment areas such as the NIAD and have neighborhood-serving commercial and open space areas within the Project Site to reduce automobile dependence. Additionally, the proposed Sub-Neighborhood Plan would have alternative forms of transportation for pedestrians, bicyclists, and transit users with the development of sidewalks, multi-use trails, paseos, bike lanes, and bus stops. The complementary mixed land uses and availability several alternative modes of transportation will reduce vehicle trips and length of vehicle trips, which will reduce vehicle emission, resulting in reduced energy consumption and vehicle emissions.

TABLE 4.16-5: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

Goal ICS-8:	**Safe bicycle and pedestrian circulation throughout the City.**
Policy ICS-8.1 Improved Bicycle and Pedestrian Safety. Promote safety by minimizing conflicts between automobiles, bicycles, and pedestrians with special attention to lighting resources on commercial corridors.	**Level II - Consistent**. As shown in **Figure 2-18: Pedestrian and Bike Network**, designated bike lanes, sidewalks, and traffic lanes would separate and minimize conflicts between automobiles, bicycles, and pedestrians. The proposed Sub-Neighborhood Plan would have Class I bikeways and Class II bike lanes to reduce conflicts between cars and bikes. The neighborhood roads would be narrow to encourage slower driving.
Policy ICS-8.3 Completing Bicycle and Sidewalk Network. Prioritize plans for bicycle and pedestrian facilities that provide continuity, and close gaps in the city's existing bike path and sidewalk network.	**Level I - Consistent**. As shown in **Figure 2-18: Pedestrian and Bike Network**, the proposed Sub-Neighborhood Plan would create a pedestrian and bike network that would further connect more portions of the City compared to existing conditions.
Policy ICS-8.4 New Development Requires Bicycle Improvements. Where designated, require proposed developments to include bicycle paths and / or lanes in their plan and to clearly indicate possible bicycling hazards such as speed bumps and storm drain inlet grates in parking lots.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan would be required to meet City design standards that address bicycling safety, including appropriate striping, signage, and design treatment of potential hazards such as speed bumps and storm drain grates.
Policy ICS-8.5 Public Sidewalks and Pedestrian Orientation. Consider and require where appropriate and feasible the enhancement of the pedestrian environment as part of private development and public works projects, especially for public sidewalks.	**Level I - Consistent**. The proposed Project would develop throughfares throughout the Project Site that would accommodate various transportation modes such as cars, bicycles, pedestrians, and transit. Wide sidewalks, well shaded with trees and lined with human-scaled street lighting provide a welcoming pedestrian experience. Where possible, parallel street parking shall be provided on both sides of the streets for additional resident and visitor spaces. Lane widths would be narrow to keep traffic speeds low, and therefore compatible with the presence of pedestrians and cyclists.
Policy ICS-8.6 Americans with Disabilities Act (ADA) Handicap Requirements. Require installation of ADA compliant handicapped ramp curb-cuts and other ADA access with all new roadway construction and significant reconstruction of existing roadways, parking lots, plazas and pedestrian area, and parks.	**Level II - Consistent**. All ROW within the Project Site would be designed and developed in compliance with the ADA standards.
Policy ICS-8.9 Street Crossings. Design street crossings to provide for the safety needs of bicyclists and pedestrians in accordance with the designations set forth in the Bicycle Master Plan.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan would include development of street crossings that are designed to meet City Bicycle Master Plan standards for visibility, accessibility, and multimodal safety, ensuring that crossings safely accommodate bicyclists and pedestrians.
Policy ICS-8.13 Importance of Pedestrian and Bicycle Access in Site Planning. Require that new development treat pedestrian and bicycle circulation as equal to or	**Level I - Consistent**. The proposed Sub-Neighborhood Plan prioritizes the development of alternative modes of transportation to further connect jobs, housing, open

TABLE 4.16-5: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

preferred to vehicular access in site design including, but not limited to, access to neighborhood and commercial shopping centers, schools, and parks.	space, and other portions of the City compared to existing conditions.
Policy ICS-8.14 Connecting Facilities. Create a physical link for pedestrian and bicycle traffic between parks and recreation facilities as specified in the Bike and Pedestrian Master Plan.	**Level I - Consistent**. As shown in **Figure 2-18: Pedestrian and Bike Network**, the proposed pedestrian and bicycle network would connect to existing and proposed parks.
Goal ICS-9:	**Adequate parking and loading facilities to support residential and commercial parking needs.**
Policy ICS-9.2 Development Has Adequate Parking. Review development proposals to encourage shared parking use and ensure adverse parking impacts are minimized or avoided.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan would provide adequate parking for the proposed land uses and would be developed according to applicable City Municipal Code parking regulations. **Table 2-3: Parking Spaces Required** provides the parking spaces required for each residential and commercial building that may be developed as part of the proposed Sub-Neighborhood Plan.
Goal ICS-20:	**Protected public through effective fire protection services and the incorporation of fire safety features in new development.**
Policy ICS-20.10 Adequate Emergency Access and Routes. Require that new development provide adequate access for emergency vehicles, particularly firefighting equipment, and evacuation routes, as appropriate.	**Level II - Consistent**. As discussed in Threshold c and d, the proposed Sub-Neighborhood Plan would have adequate emergency access during construction with implementation of a Construction Mitigation Plan under **MM TRANS-1**, and there would be adequate circulation during construction. The proposed Project's circulation plan was reviewed by the City Traffic Engineer and was determined to be adequate under City development standards and for emergency circulation.
Chapter 7: Safety and Hazards	
Goal SH-4:	**Emergency preparedness through the provision of adequate fire and police protection, infrastructure, emergency supply stockpiling, public education, EOC planning and procedures, and outreach programs.**
Policy SH-4.6 Access and Evacuation Corridors. Ensure that access and evacuation corridors are identified in the event of various types of minor and major emergencies.	**Level II - Consistent**. As discussed in Threshold c and d, the proposed Sub-Neighborhood Plan would have adequate emergency access during construction with implementation of a Construction Management Plan under **MM TRANS-1**, and there would be adequate circulation during construction. The proposed Project's circulation plan was reviewed by the City Traffic Engineer and was determined to be adequate under City development standards and for emergency circulation.
Goal SH-8:	**Acceptable safety and environmental health risks associated with vehicular transit.**
Policy SH-8.2 Reducing Speed on Neighborhood Streets. Ensure that neighborhood streets are designed to discourage excessive speeds and work to reduce speeds by increasing enforcement, education, improving signage, and/or traffic calming measures.	**Level II - Consistent**. The proposed Sub-Neighborhood Plan roads are designed to be narrow to discourage speeding.

TABLE 4.16-5: PROJECT CONSISTENCY WITH THE CITY OF OXNARD 2030 GENERAL PLAN

Source: City of Oxnard. *2030 General Plan*. 2022. Accessed May 2025. https://www.oxnard.gov/wp-content/uploads/2023/10/Oxnard-2030-General-Plan-Amend-12.2022-SMda.pdf.

City of Oxnard Bicycle and Pedestrian Facilities Master Plan

Table 4.16-6: Project Consistency with the City's Bicycle and Pedestrian Facilities Master Plan provides an assessment of the consistency of the proposed Project with the City's Bicycle and Pedestrian Facilities Master Plan applicable transportation goals and objectives.

TABLE 4.16-6: PROJECT CONSISTENCY WITH THE CITY'S BICYCLE AND PEDESTRIAN FACILITIES MASTER PLAN

Goal:	**The Oxnard Bicycle and Pedestrian Facilities Master Plan intends to make bicycling and walking integral modes of transportation in Oxnard through a safe, interconnected system of bicycle and pedestrian facilities. The following objectives serve to implement this overarching goal:**
Objective: Continue to improve and expand pedestrian and bicycle facilities, as needed throughout the community, with a focus on improved connectivity within the city.	**Consistent.** The proposed Sub-Neighborhood Plan would develop pedestrian and bicycle facilities such as sidewalks, paseos, multi-use paths, and bike lanes /routes throughout Area A and C that would further connect portions of the City compared to the existing conditions.
Objective: Ensure that pedestrian and bicycle networks provide direct connections between major activity centers (e.g., civic, employment, and retail centers) and minimize conflicts with other modes of transportation.	**Consistent.** The proposed Sub-Neighborhood Plan would establish a network of pedestrian and bicycle facilities throughout the Project Site, providing direct access to on-site commercial uses and seamless connections to surrounding developed areas of the City including the residential, commercial, and open space land uses adjacent to the Project Site. These improvements would enhance active transportation options and strengthen connectivity to nearby destinations, including the NIAD, one of the City's major employment centers.
Objective: Improve bicycle and pedestrian access and safety to public transportation stops and stations.	**Consistent**. There are several GCTD bus stops along Rose Avenue that would serve the Project Site. The proposed multi-use paths, sidewalks, and bicycle lanes along Rose Avenue would provide access to these bus stops.
Objective: Regard facilities for bicyclists and pedestrians as important parts of the overall transportation system and not just recreational facilities.	**Consistent.** The proposed Sub-Neighborhood Plan was developed with a goal to incorporate alternative modes of transportation to reduce VMT. The proposed pedestrian and bicycle facilities would allow greater access throughout the Project Site and connect to nearby transit, pedestrian, and bicycles facilities.

TABLE 4.16-6: PROJECT CONSISTENCY WITH THE CITY'S BICYCLE AND PEDESTRIAN FACILITIES MASTER PLAN

Objective: Increase the bicycle mode share throughout the city and improve bicycle access to the city's transportation system.	**Consistent.** The proposed Sub-Neighborhood Plan would incorporate bike lanes that would connect residences to commercial and open space areas, increasing the opportunity for bicycle mode transportation.

Source: City of Oxnard. *Bicycle and Pedestrian Facilities Master Plan*. 2012. https://www.oxnard.gov/wp-content/uploads/pdfs/departments/community-development/planning/oxnard-bpmp-final-plan_adopted-feb-2012.pdf.

Conclusion

As discussed above, the proposed Sub-Neighborhood Plan would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities with the incorporation of **MM TRANS-1**. **MM TRANS-1** would require the development and implementation of a Construction Management Plan that would include construction staging and storage areas; haul routes; construction employee parking plan; traffic control measures; pedestrian and bicycle safety measures; and emergency access to ensure that there is adequate circulation within and surrounding the Project Site during construction. Therefore, impacts would be less than significant with mitigation incorporated.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than Significant.

Pursuant to Section 15064.3, subdivision (b) of the CEQA Guidelines, a project's transportation impacts are evaluated based on VMT. This section implements SB 743, which was adopted to modernize how transportation impacts are analyzed under CEQA by focusing on the reduction of GHG emissions, the promotion of infill development, and the improvement of public health through reduced automobile dependence. Under this framework, VMT—defined as the total number of miles traveled by vehicles associated with a project—is the most appropriate metric to assess a project's transportation impact. Projects that generate or result in VMT exceeding established thresholds may be considered to have a significant transportation impact.

The City's VMT methodology for land use projects and plans is consistent with the OPR's Land Use and Climate Innovation (LCI) Technical Advisory on Evaluating Transportation Impacts in CEQA for office, retail, and residential land uses.[10]

[10] State of California, Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

The first step in the VMT evaluation is to determine what level of analysis, if any, is needed. The City has various screening criteria that can be used to identify whether a proposed project is expected to result in a less-than-significant impact without conducting a detailed study. Examples of these include (1) small project screening, (2) location in an efficient, (3) low VMT area location close to transit, and (4) projects including affordable housing and/or local serving retail. All the screening criteria are identified in **Table 4.16-7: VMT Screening Criteria**. If a project satisfies one or more of the criteria shown in **Table 4.16-7**, it can be considered to result in a less than significant impact and further evaluation of VMT impacts is not required.

TABLE 4.16-7: VMT SCREENING CRITERIA

Screening Criteria	Project Requirements to meet Screening Criteria
Project Size	A residential or office project that generates 110 or fewer daily trips.
Locally Serving Project	A project that has locally serving retail uses that are 50,000 square feet or less. Locally serving retail is retail development that generally improves the convenience of shopping close to home, such as specialty retail, shopping center, grocery store, pharmacy, day care centers, financial services/banks, fitness center or health club, restaurant, and café. This screening criteria may also include locally serving uses such as locally serving assembly uses (places of worship and community organizations) and locally serving community institutions such as K-12 schools, public libraries, fire stations, local government, local parks, and similar uses. For non-retail uses that are local serving, evidence should be provided to City staff to substantiate the local serving nature of a project. If the project contains other land uses such as housing or larger retail centers, those uses need to be considered under one of the other screening criteria below.
Project Located in a Low VMT Area	A residential or office project that is located in an area that is already 15% below the Ventura County Existing VMT (see VMT screening maps in **Appendix Q** for residential and employment projects – Zones colored in blue are already 15% or more below the Ventura County Existing VMT). For mixed-use projects that include both residential and office/commercial land uses, all project land uses should be evaluated against both low VMT screening thresholds.
Transit Proximity	A residential, office, or retail project that is located within a ½ mile of the Metrolink station or within a ½ mile of a bus stop with service frequency of 15 minutes or less during commute periods (Public Resource Code § 21064.3). In addition, the project should have all the following characteristics: • A floor Area Ratio (FAR) of 0.75 or greater • Is consistent with the applicable current SCAG SCS (as determined by the City) • Does not provide more parking than is required under the City of Oxnard Municipal Code or Specific Plan parking requirements • Does not replace affordable housing units with moderate- or high-income residential units
Affordable Housing	A residential project that provides affordable housing units; if part of a larger development, only those units that meet the definition of affordable housing satisfy the screening criteria.

TABLE 4.16-7: VMT SCREENING CRITERIA	
Screening Criteria	**Project Requirements to meet Screening Criteria**
Transportation Facilities	Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks. Such transportation projects include mass transit, bicycle and pedestrian facilities, intersection traffic control (e.g., traffic signals or roundabouts), or widening at intersections to provide new turn lanes.

Source: Fehr & Peers. *Transportation Analysis for the Oxnard Maulhardt-Stiles Sub-Neighborhood Plan Residential Mixed-Use Project*. Drafted April 1, 2026. See **Appendix R.**

Screen Criteria Analysis

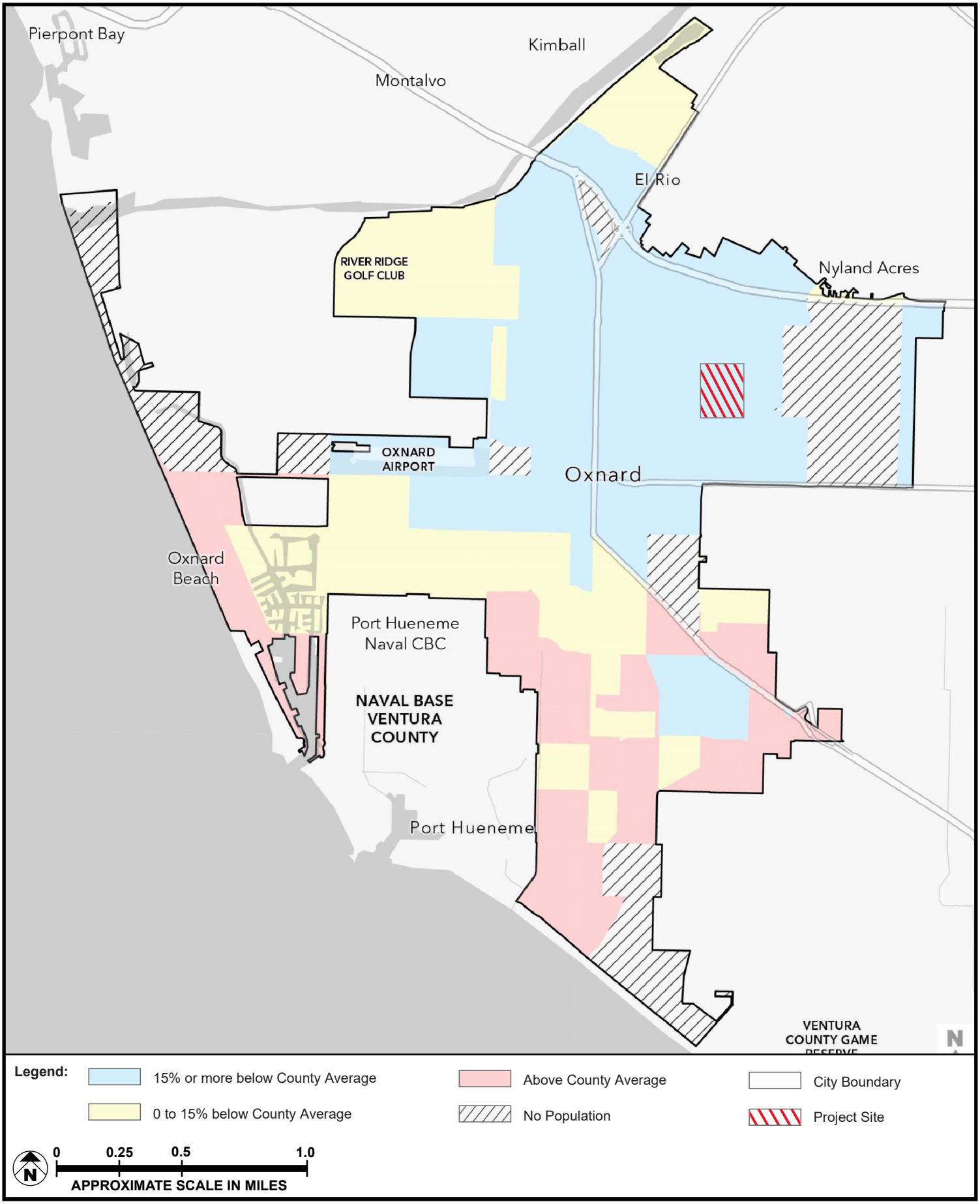
For mixed-use projects that include both residential and commercial land uses, all project land uses are evaluated.

Screening Criteria: Locally Serving Project

The commercial component of the proposed Sub-Neighborhood Plan is designed to include local serving retail uses and is less than 50,000 square feet in size. Therefore, the commercial component of the proposed Sub-Neighborhood Plan qualifies for the locally serving project screening criteria and would result in a less than significant VMT impact.

Screening Criteria: Project Located in a Low VMT Area

The City's VMT Guidelines state that residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact. Low VMT areas are defined by the City as areas that are currently generating VMT per Capita 15% or more below the City's VMT threshold. Based on the City's VMT guidance, a residential low VMT (Home-Base VMT) per Capita area is defined as a Traffic Analysis Zone (TAZ) (as defined in the Ventura County Transportation Commission (VCTC) Travel Demand Model) that is 15% lower than the existing average VMT per Capita for Ventura County. As shown in **Figure 4.16-2: City of Oxnard Residential Low VMT Screening**, the Project Site is located within an area that meets this criterion. Therefore, the residential component of the proposed Sub-Neighborhood Plan qualifies for the low VMT screening criteria and would result in a less than significant VMT impact.



SOURCE: Fehr & Peers - 2025.

FIGURE **4.16-2**

Meridian Consultants

City of Oxnard Residential Low VMT Screening

408-001-24

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant with Mitigation.

Construction

Construction of the proposed Sub-Neighborhood Plan could temporarily close motor vehicles lanes, bicycle lanes, and/or sidewalks and increase vehicle trips associated with construction workers and material deliveries, which could result in short-term roadway hazards or circulation constraints. However, implementation of **MM TRANS-1** would require preparation of a Construction Mitigation Plan identifying construction staging areas, haul routes, employee parking, traffic control signage, and protective barriers. This plan would be reviewed and approved by the City prior to building permits to ensure safe and adequate circulation within and around the Project Site during construction. Implementation of the **MM TRANS-1** would ensure that construction-related traffic impacts, including roadway hazards and temporary circulation disruptions, would be less than significant.

Operation

The proposed Sub-Neighborhood Plan circulation system was reviewed by the City Traffic Engineer and determined to be consistent with applicable City roadway design and safety standards, including requirements for intersection geometry, sight distance, pedestrian crossings, bicycle facilities, and traffic control devices. Compliance with these standards ensures that roadways would safely accommodate anticipated vehicle, bicycle, and pedestrian travel and would not introduce geometric or operational hazards.

The Project circulation system includes a network of public and private streets designed to City standards; sidewalks and multi-use paths that separate pedestrian and bicycle travel from vehicle traffic where feasible; clearly defined intersections with appropriate turning radii and visibility; and traffic control devices such as stop controls and striping to regulate vehicle movements. These design features provide safe access throughout the Project Site and minimize potential conflicts among vehicles, pedestrians, and bicyclists.

Because the Project roadway and access design would comply with applicable City engineering and safety standards and would provide safe internal circulation and site access, the Project would not create roadway hazards or unsafe conditions. Therefore, operational impacts related to roadway safety would be less than significant.

d) Would the project result in inadequate emergency access?

Less than Significant with Mitigation.

Construction

Construction of the proposed Sub-Neighborhood Plan could temporarily close motor vehicles lanes, bicycle lanes, and sidewalks and increase vehicle trips associated with construction workers and material deliveries, which could result in short-term circulation constraints and emergency access. However, implementation of **MM TRANS-1** would require preparation of a Construction Mitigation Plan identifying construction staging areas, haul routes, employee parking, traffic control signage, and protective barriers. This plan would be reviewed and approved by the City to ensure safe and adequate circulation within and around the Project Site during construction. Implementation of the **MM TRANS-1** would ensure that construction-related traffic effects, including emergency access, would be less than significant.

Operation

The Project Site is located in an established, developed area with sufficient access for emergency service providers. The proposed Sub-Neighborhood Plan circulation system was reviewed by the City Traffic Engineer and determined to be consistent with applicable City roadway design and safety standards, including requirements for intersection geometry, sight distance, pedestrian crossings, bicycle facilities, and traffic control devices. Compliance with these standards ensures that roadways would safely accommodate emergency vehicles and would ensure adequate emergency access.

The Project circulation system includes a network of public and private streets designed to City standards; sidewalks and multi-use paths that separate pedestrian and bicycle travel from vehicle traffic where feasible; clearly defined intersections with appropriate turning radii and visibility; and traffic control devices such as stop controls and striping to regulate vehicle movements. These design features provide safe access throughout the Project Site and minimize potential conflicts among emergency vehicles and personnel.

Because the Project roadway and access design would comply with applicable City engineering and safety standards and would provide safe internal circulation and site access, the Project would not create inadequate emergency access. Therefore, operational impacts related to roadway safety would be less than significant.

4.16.6 Cumulative Impacts

As detailed in the City's 2030 General Plan EIR, automobile, transit, bicycle, and pedestrian facilities would be developed to accommodate the planned development outlined in the City's General Plan. The facilities would be developed under the City's development standards to minimize impacts related to circulation and safety. However, the City's traffic model analyzed LOS and determined that regional growth would result in several intersections to have LOS D or worse. Mitigation at these deficient intersections were considered infeasible and/or undesirable, resulting in significant cumulative impacts related to transportation.

The proposed Sub-Neighborhood Plan's automobile, transit, bicycle, and pedestrian facilities were reviewed under the City Traffic Engineer and determined that the facilities are developed under City development standards to minimize circulation and safety impacts.

As shown in **Table 4.16-4,** the addition of traffic from the Project (Cumulative + Project condition) would not worsen LOS at any study intersection compared to the Cumulative Base scenario. The LOS at all the study intersections would not change with addition of traffic from the Project. For these reasons, the Project would not contribute to significant cumulative transportation impacts.

4.16.7 Level of Significance Without Mitigation

Impacts would be significant without mitigation measures.

4.16.8 Mitigation Measures

The following mitigation measures are proposed to reduce potential impacts to transportation and circulation to less than significant:

MM TRANS-1 Prior to the start of construction, the applicant shall prepare a Construction Mitigation Plan (CMP) to minimize traffic, circulation, and access disruptions associated with construction activities. The CMP shall be submitted to the City for review and approval and shall include, at a minimum, the following:

Construction Staging and Storage Areas

Identification of all construction staging, equipment storage, and material stockpiling areas to ensure they do not obstruct public rights-of-way, bicycle lanes, or pedestrian pathways.

Haul Routes

Designation of truck haul routes to and from the Project Site that minimize impacts on residential neighborhoods, schools, and other sensitive uses. Haul routes shall be reviewed and approved by the City.

Construction Employee Parking Plan

Provision of on-site or off-street parking for construction workers to prevent parking spillover onto adjacent streets or surrounding neighborhoods.

Traffic Control Measures

A traffic control plan prepared in compliance with the California Manual on Uniform Traffic Control Devices (CA-MUTCD), including signage, temporary delineators, flaggers, lane closure procedures, and detour routes for vehicles, pedestrians, and bicyclists, as needed.

Pedestrian and Bicycle Safety Measures

Measures to maintain or safely reroute pedestrian and bicycle access during construction, including temporary pathways, barriers, and warning signage.

Emergency Access

Assurance that access for emergency vehicles is maintained at all times. Any temporary lane closures or detours shall be coordinated with the City and local emergency service providers.

Implementation of the approved Construction Mitigation Plan shall occur throughout all construction phases. With implementation of the CMP, construction-related traffic hazards and circulation disruptions would be minimized. A traffic operations management plan will be developed for periods of full roadway closure. If construction activities necessitate a complete closure, a detour plan and a traffic operations analysis of affected signalized intersections will be prepared and implemented to minimize the impacts of rerouted traffic.

4.16.9 Level of Significance After Mitigation

With implementation of mitigation measure **MM TRANS-1**, impacts to traffic hazards and emergency access would be mitigated to less than significant.

4.17 TRIBAL CULTURAL RESOURCES

This section analyzes the potential impacts to tribal cultural resources from the implementation of the proposed Sub-Neighborhood Plan.

Ethnographic Context

As discussed in the Phase I Archaeological Report (Phase I Report) (**Appendix H**), the Project Area lies within the traditional territory of the Ventureño Chumash, a group of Chumashan-speaking people who inhabited the central California coast, including the Oxnard Plain, the Santa Clara River Valley, and surrounding inland and coastal regions.[1] Prior to European contact, the Chumash were one of the most populous and sophisticated hunter-gatherer societies in California.[2]

Their subsistence system was based on seasonal mobility and the harvesting of a wide range of natural resources, including acorns, chia seeds, shellfish, and fish.[3] Acorns, in particular, were a staple of their diet and were ground into flour using stone mortars and pestles. The Chumash also engaged in pelagic fishing and exploited shellfish such as mussels and abalone, particularly during the summer months when coastal village populations would swell.[4] They were expert basket makers, producing tightly woven and sometimes waterproof vessels for cooking, storage, and transport. Their dwellings were large, domed houses constructed from willow poles and thatched with tule, which often housed extended families.

The Chumash maintained an advanced socio-political structure, with small-scale chiefdoms and a stratified society that included hereditary chiefs and individuals with specialized roles, such as ritual leaders, healers, and messengers.[5] Over time, they developed an extensive trade network across southern California and into the interior, with Olivella shell beads functioning as a form of currency. Their maritime skill was evident in their use of the tomol, a plank canoe used to navigate the Santa Barbara Channel and reach the Channel Islands.

Archaeological evidence reveals a long history of human occupation in the Ventura County area, dating back over 12,000 years on the Channel Islands, though earlier mainland sites may have been

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1 California Language Archive. “Ventureño.” Accessed October 2025. https://cla.berkeley.edu/languages/ventureno.html.

2 National Park Service. “Native Inhabitants — Channel Islands National Park.” December 4, 2023. Accessed January 2026. https://www.nps.gov/chis/learn/historyculture/nativeinhabitants.htm.

3 National Park Service. *Guide to Island Chumash Plant Usage, Native Plant Garden*. Channel Islands National Park 2023. Accessed January 2026. https://www.nps.gov/chis/learn/upload/CHIS-Plant-Usage-Garden-Guide-2023-ADA.pdf.

4 Santa Barbara Museum of Natural History. “Daily Life, Food” Accessed October 2025. https://www.sbnature.org/collections-research/anthropology/chumash-life/daily-life.

5 California State Parks. “Humaliwo: An Ethnographic Overview of the Chumash in Malibu.” Accessed October 2025. https://www.parks.ca.gov/?page_id=24435.

lost to rising sea levels.[6] Cultural periods in the region include the Paleo-Indian (12,000–8,000 B.C.), Early (7,000–2,000 B.C.), Middle (1,400 B.C.–A.D. 1150), and Late Periods (A.D. 1000 until the Mission era). These periods saw a progression from small, mobile bands to more complex, sedentary village life marked by technological innovation and increasingly elaborate material culture.

This thriving indigenous culture was dramatically disrupted following European contact. In 1769, the Spanish Portolá expedition reached the region,[7] and the San Buenaventura Mission was established in 1782.[8] The mission system imposed forced labor, religious conversion, and relocation upon the Chumash population, which, combined with exposure to new diseases, led to widespread mortality and the collapse of traditional lifeways.[9] By 1810, most Chumash villages in the region had been abandoned, and the community was significantly depopulated and dispersed.

4.17.1 Existing Conditions

Project Site

As detailed in the Historical Report (**Appendix G**), the entire Project Site used to be owned by the Maulhardt family, prominent early German-American settlers who played a major role in the development of agriculture on the Oxnard Plain from the late 1800s onward. Area B was sold to the Oxnard Union High School District and developed with the Del Sol High School, which opened in 2023.

As detailed in **Section 4.5 Cultural Resources** of this Draft EIR, the Historic Report and archaeological reports did not identify any tribal cultural resources within the Project Site. Historic resources and archaeological scatter identified within the Project Site was related to the Maulhardt family.

4.17.2 Regulatory Framework

Federal

There are no federal regulations applicable to the proposed Project.

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6 National Park Service. “Native Inhabitants — Channel Islands National Park.”

7 California Office of Historic Preservation. “Portolá Expedition, Historical Landmark.” Accessed October 2025. https://ohp.parks.ca.gov/ListedResources/Detail/727.

8 California Office of Historic Preservation. “Mission San Buenaventura, Historical Landmark.” Accessed October 2025. https://ohp.parks.ca.gov/ListedResources/Detail/310.

9 National Park Service. *National Register of Historic Places Multiple Property Documentation Form.* Native Americans and the California Mission System, 1769-1848. (n.d.). Accessed January 2026. https://ohp.parks.ca.gov/pages/1054/files/CA_Multiple_Native%20Americans%20and%20CA%20Mission%20System%20MPDF.pdf.

State

Senate Bill 18

California State Senate Bill 18 (SB 18), signed into law in September 2004 and implemented March 1, 2005, requires cities and counties to notify and consult with California-recognized Native American Tribes about proposed local land use planning decisions for the purpose of protecting Traditional Tribal Cultural Places.[10] The Governor's Office of Planning and Research was mandated to amend its General Plan Guidelines to include the stipulations of SB 18 and to add advice for consulting with California Native American Tribes.

Assembly Bill 52

Assembly Bill (AB) 52 provides for the consideration of tribal cultural resources during the CEQA process by adding or amending the PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 5097.94.[11] This bill specifies that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. The bill requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project prior to determining whether a negative declaration, mitigated negative declaration, or EIR is required for a project. This requirement is applicable if the tribe has requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. The bill also specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. Tribal cultural resources are either of the following:

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

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10 California Government Code. Section 65352.3, subdivision (a)(1) (West 2025).

11 Statutes of 2014, Chapter 532 (Assembly Bill 52), amending California Public Resources Code, Sections 5097.94, 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, 21084.3 (accessed February 23, 2026). https://leginfo.ca.gov/pub/13-14/bill/asm/ab_0051-0100/ab_52_bill_20140925_chaptered.pdf.

California Public Resource Code

In addition to the PRC sections affected by AB 52, several other sections regulate cultural resources. California PRC Section 5020-5029.5 establishes the criteria for the CRHR, creates the California Historic Landmarks Committee, and authorizes the Department of Parks and Recreation to designate Registered Historical Landmarks and Registered Points of Historical Interest. It also establishes criteria for the protection and preservation of historic resources. Several other sections of the California Public Resource Code also provide protection of cultural resources. Section 5097-5097.6 provides guidance for state agencies in the management of archaeological, paleontological, and historical sites affected by major public works project on state land.

Subsections 5097.9-5097.991 establish regulations for the protection of Native American religious places and establishes the Native American Heritage Commission (NAHC). They also require that California Native American remains and associated grave artifacts be repatriated and that notification of discovery of Native American human remains be made by the NAHC to a MLD. Subsection 5097.993-.994 establishes fines or both fine and imprisonment for the unlawful excavation, removal, or destruction of Native American archaeologic al or historic sites on public or private lands.

Senate Bill 922

Senate Bill 922 exempts from California Public Records Act information pertaining to Native American graves, cemeteries, archaeological sites, and sacred places in the possession of the California NAHC and other state or local agencies.[12]

Administrative Code, Title 14, Section 4307

Administrative Code, Title 14, Section 4307 prohibits individuals from removing, injuring, defacing, or destroying any object of paleontological, archaeological, or historical interest or value.

Penal Code, Title 14, Section 622.5

Penal Code, Title 14, Section 622.5 establishes as a misdemeanor offense for any person, other than the owner, who willfully damages or destroys archaeological or historic features on public or privately-owned land.

California Health and Safety Code, Section 7050.5-7052 and 8010-8011

Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC within 24 hours. Section 7052 of the Health and Safety Code states that it is a felony to disturb Native American burials. Section 8010-8011 establishes a state repatriation policy to ensure that all California Indian human

12 California Government Code. Section 7927.000 (West 2025).

remains and cultural items are treated with dignity and respect and encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California.

Local

City of Oxnard General Plan Goals and Policies

The City of Oxnard largely defers to CEQA for guidance with cultural resources projects. Among the City of Oxnard's 2030 General Plan Goals and Policies Related to tribal cultural resources are the following:

Chapter 3 Community Development

Goal CD-7: Development of vibrant mixed-use urban villages characterized by a mix of land uses, transit accessibility, pedestrian orientation, and neighborhood identity.

Policy CD-7.4 ***Urban Village Design Guidelines.***

Develop Urban Village Design Guidelines that incorporate the following features, where appropriate:

- *Provide a variety of transportation choices and an interconnected multi-modal mobility network.*
- *Offer a variety housing choices and opportunities, including at least 15 percent affordable housing.*
- *Encourage compact development in order to free up more private and civic open space.*
- *Preserve open space, historic, cultural, and natural assets.*
- *Use green and sustainable building and planning technologies.*
- *Incorporate methods of measuring vehicle trips as part of the metrics required for a Sustainable Community Strategy (SB 375).*

Policy CD-9.1 ***Neighborhood Identity***

Recognize, preserve, and improve the visual identity and character of existing neighborhoods. Infill development shall respect historic structures and be of compatible scale and character with historic areas.

Goal CD-11: Protected historic and authentic qualities of Oxnard's traditional neighborhoods and historic districts.

Policy CD-11.3 ***Protect and Enhance Cultural Resources***

Ensure that new public and private investment protects and enhances Oxnard's existing cultural resources, traditional neighborhoods, and historic districts, to the extent feasible.

Policy CD-11.4 ***Incorporate Historic Features***

Require new developments within historic areas to incorporate historic and natural features and adaptive reuse into site development planning.

Chapter 5 Environmental Resources

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

Policy ER-1.1 ***Protect Oxnard's Natural and Cultural Resources***

Protect the City's natural resource areas, fish and wildlife habitat, scenic areas, open space areas, parks, and cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible.

Goal ER-9: Enhanced perceived character and quality of the City of Oxnard.

Policy ER-9.2 ***Enhance Neighborhood Diversity***

Enhance neighborhood diversity and reinforce the desirable elements of neighborhood character and quality through incorporation of design guidelines, use of landscape materials, and encouraging new developments to integrate historical and culturally significant elements into proposed projects.

Goal ER-11: Identification, protection, and enhancement of the City's archaeological, historical, and paleontological resources.

Policy ER-11.1 ***Archaeological Resource Surveys***

Continue to require a qualified archaeologist to perform a cultural resources study prior to project approval. Inspection for surface evidence of archaeological deposits, and archaeological monitoring during grading should be required in areas where significant cultural resources have been identified or are expected to occur.

Policy ER-11.2 ***Mitigating the Impact of New Development on Cultural Resources***

Ensure that alternatives are considered, including planning construction to avoid archaeological sites, deeding archaeological sites into permanent conservation easements, and planning parks, greenspace, or other open space to incorporate archaeological sites in the event that development threatens significant archaeological resources.

Policy ER-11.3 ***Development Applicants to Conduct Research***

Continue to require project applicants to have a qualified archaeologist conduct a record search at the South Central Coast Information Center located at California State University Fullerton and other appropriate historical repositories, conduct field surveys where appropriate, and prepare technical reports, where appropriate, meeting California Office of Historic Preservation Standards (Archaeological Resource Management Reports) prior to project approval.

Policy ER-11.4 ***Historic Preservation***

Support public and private efforts to preserve, rehabilitate, and continue the use of historic structures, sites, and districts. Where applicable, preservation efforts shall confer with the Ventura County Cultural Heritage Board and conform to the current Secretary of the Interior's Standards for Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building and the California Office of Historic Preservation.

Policy ER-11.6 ***Identification of Archaeological Resources***

In the event that archaeological/paleontological resources are discovered during site excavation, continue to require that grading and construction work on the project site is suspended until the significance of the features can be determined by a qualified archaeologist/paleontologist.

Policy ER-11.7 ***Native American Remains***

Continue to comply with State laws relating to the disposition of Native American burials consistent with the CEQA Guidelines (Section 15064.5) if human remains of possible Native American origin are discovered during project construction.

4.17.3 Significance Thresholds

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.17.4 Methodology

The methodology for this section relies on several technical reports to determine the potential presence of tribal cultural resources on the Project Site and the potential to impact tribal cultural resources with the development of the proposed Project. The discussion below is based on several reports, including a Historic Resources Report by Post/Hazeltine Associates (**Appendix G**) evaluating potential historic resources within the Project Site, and a Phase I Report (**Appendix H**), XPI Report (**Appendix I**), and Phase II Report (**Appendix J**) by Provenience Group, Inc. (PGI) evaluating potential archaeological resources within the Project Site. Additionally, tribal consultation letters were sent to applicable tribes and responses can be found in **Appendix S**.

Additionally, as described below, the City complied with the requirements of SB 18 related to tribal consultation.

4.17.5 Project Impacts

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact with Mitigation Incorporated.

As detailed in the Phase I Report, a record search was conducted at the South-Central Coast Information Center of the California Historic Resources Information System (SCCIC-CHRIS) to

determine if there were previously recorded cultural resources are present within Project Site. However, there were no previously recorded cultural resources within the Project Site.

As detailed in the Historic Resources Report, no significant historic resources related to tribes have been identified on the Project Site. Historic resources consisted of buildings associated with the Maulhardt family and associated agricultural structures. The Phase I pedestrian survey and subsequent Extended Phase I and Phase II investigations conducted by PGI included a surface survey, shovel test probes (STPs), and controlled subsurface excavation in areas where artifacts were identified. The pedestrian survey documented a small, sparse scatter of historic-period materials in the residential portion of the Maulhardt Ranch property, including glass and ceramic fragments, a marine shell fragment, and several complete historic bottles associated with ranch activities.

To evaluate the integrity and significance of the deposit, archaeologists excavated multiple shovel test probes in 10-centimeter levels within the area of the artifact scatter. Excavated soils were screened to recover cultural materials, and recovered artifacts were cleaned, cataloged, and analyzed for diagnostic attributes such as maker's marks, manufacturing techniques, and bottle seams to establish age and association. The testing confirmed that the materials represented a limited historic-era refuse deposit related to twentieth-century ranch occupation. No intact midden deposits, subsurface features, or significant prehistoric archaeological materials were identified. No prehistoric artifacts or tribal cultural resources were encountered during surface survey or subsurface testing.

Consistent with Senate Bill (SB) 18, the City of Oxnard contacted NAHC to determine the applicable tribes to contact regarding the ground disturbance of the Project. Of the four state tribes NAHC provided, only one tribe, the Santa Ynez Band of Chumash Indians, replied and did not request consultation (**Appendix S**).

As part of the Phase I Report, PGI initiated consultation with the NAHC on September 13, 2024, to inquire if known sacred sites are present in the project area; the result was negative. The NAHC provided a list of eight (8) Native American groups and individuals on September 24, 2024. As part of AB 52, letters and/or emails were provided to each of the contacts on November 8, 2024, to representatives and their responses detailed below in **Table 4.17-1: AB 52 Native American Consultation**. Follow-up phone calls were made on November 12 and 14, 2024. Two tribal contacts, Barbareño/Ventureño Band of Mission Indians and the Coastal Band of the Chumash Nation recommended Native American monitoring during ground disturbances for the proposed Project. Therefore, **MM TCR-1** would ensure that there is Native American monitoring during ground disturbing activities and would follow applicable regulatory requirements in the case of unanticipated discovery of tribal cultural resources.

TABLE 4.17-1: AB 52 NATIVE AMERICAN CONSULTATION			
Name	**Date**	**Affiliation**	**Comment**
Matthew Vestuto	11/8/2024; 11/12/2024	Barbareño/Ventureño Band of Mission Indians	On Nov. 12, 2024, Mr. Vestuto stated that tribal monitors should be on site during ground disturbances.
Julio Quair, Chairperson	11/8/2024	Chumash Council of Bakersfield	The email provided was no longer in use and the phone number provided was disconnected.
Gabe Frausto, Chairman	11/8/2024; 11/12/2024	Coastal Band of the Chumash Nation	Mr. Frausto stated that tribal monitors should be on site during ground disturbances.
Violet Walker, Chairperson	11/8/2024; 11/12/2024	Northern Chumash Tribal Council (NCTC)	Called on Nov. 12 and 14, 2024, but Ms. Walker's mailbox was full, so it was not possible to leave a phone message.
Crystal Mendoza, Elders' Council Administrative Assistant	11/8/2024; 11/12/2024	Santa Ynez Band of Chumash Indians	On Nov. 12 and 14, 2024, phone messages were left for Ms. Mendoza.
Sam Cohen, Government & Legal Affairs Director	11/8/2024	Santa Ynez Band of Chumash Indians	Email provided on 11/8/2024.
Nakia Zavalla, Tribal Historic Preservation Officer	11/8/2024	Santa Ynez Band of Chumash Indians	Email provided on 11/8/2024.
Wendy Teeter, Cultural Resources Archaeologist	11/8/2024; 11/12/2024	Santa Ynez Band of Chumash Indians	On Nov. 12 and 14, 2024 phone messages were left for Ms. Teeter.

Source: PGI. *Phase I Archeology Report*. 2024. See **Appendix H**.

The majority of the Project Site is undeveloped, which could result in potential discovery of human remains associated with Native Americans. California Public Resources Code (PRC) Section 5097.98, requires that any unanticipated discovery of human remains be treated with dignity and in accordance with established procedures, including immediate notification of the county coroner, consultation with the Native American Heritage Commission, and involvement of a Most Likely Descendant to determine the respectful treatment and disposition of the remains.

With implementation of **MM TCR-1**, impacts related to tribal cultural resources would be less than significant.

4.17.6 Cumulative Impacts

The potential for the Project to result in a cumulatively considerable contribution to Tribal Cultural Resources (TCRs) was analyzed in conjunction with other developments located in the influence areas of the tribes that occupied the region. As discussed, construction of the Project may disturb native soils potentially containing undiscovered tribal cultural resources. **MM TCR-1** would reduce

the potential impact of the Project on any resources encountered on the Project Site during construction to less than significant. Furthermore, the proposed Sub-Neighborhood Plan would also be required to comply with Health and Safety Code Section 7050.5, PRC Section 5097.98, and CEQA Guidelines Section 15064.5, which provide guidance on the discovery of human remains and treatment or disposition with appropriate dignity. Related projects would be required to conduct the same level of analysis and would be subject to these existing regulatory requirements. Therefore, with incorporation of **MM TCR-1** and compliance with existing applicable regulatory requirements, the proposed Project would not contribute to any cumulatively considerable impact.

4.17.7 Level of Significance Before Mitigation

The impact of the Project on tribal cultural resources would be significant before mitigation.

4.17.8 Mitigation Measures

MM TCR-1 Native American Monitoring

A Native American monitor shall be invited to be present on-site during ground disturbing activities in the case of unanticipated discovery of potential tribal cultural resources. If previously unidentified cultural resources are encountered during construction within the Project Site, then the archaeologist will have the authority to halt work within 50 feet of the area until the project Native American monitor can assess the find; determine potential significance; and appropriate actions.

4.17.9 Level of Significance After Mitigation

The impacts of the Project on tribal cultural resources would be less than significant with implementation of **MM TCR-1**.

4.18 UTILITIES AND SERVICE SYSTEMS

This section evaluates the potential impacts on utilities and service systems related to the implementation of the proposed Project. The analysis below is partially based on the Water Supply Assessment (WSA) by Meridian Consultants, LLC (**Appendix P**), which assesses the Project's water demand relative to existing and planned water supplies.

4.18.1 Existing Conditions

Water

Water Supply

The Project Site is within the City's water service area. The City obtains water from imported surface water from Calleguas, local groundwater from United, and local groundwater from City wells. Calleguas is a regional wholesale agency that obtains water from Metropolitan and the State Water Project (SWP). The City blends water from these 3 sources to achieve a balance between water quality, quantity, reliability, and cost.[1] Water sources converge at 6 Blending Stations (BS) and blended water is then distributed to customers. Additionally, the City produces recycled water at its Advanced Water Purification Facility (AWPF) and delivers recycled water for agricultural, industrial and irrigation. Recycled water uses will be expanded to include groundwater recharge and indirect potable reuse.[2] As of 2021, the City receives 36% of its water from City groundwater, 34% from Calleguas, and 30% from United.[3] Actual water supplies provided to the City for the year 2020 are summarized in **Table 4.18-1: Water Supply Sources for the City in 2020** and **Table 4.18-2: Projected Water Supplies (AFY)**, which illustrate projected water supplies available to the City.

TABLE 4.18-1: WATER SUPPLY SOURCES FOR THE CITY IN 2020

Water Supplier	Water Source	Amount (AFY)
City	Groundwater (not desalinated)	7,744
United	Groundwater (not desalinated)	10,074
Calleguas	Purchased or Imported Water	7,060
Wheeled to PHWA	Purchased or Imported Water	1,007
	Recycled Water	154
Total		**26,039**

Note: Water quality of all water supply listed above (except recycled water) consists of drinking water quality.

Source: City of Oxnard. *Urban Water Management Plan*. Accessed December 2024. https://www.oxnard.gov/public-works/water/water-quality-reports.

1 City of Oxnard. "Water Supply Characterization." *Urban Water Management Plan*. p. 6-1. Accessed December 2024. https://www.oxnard.gov/public-works/water/water-quality-reports.

2 City of Oxnard. "Water Supply Characterization." *Urban Water Management Plan*.

3 City of Oxnard. *Drinking Water Consumer Confidence Report*. 2021. Accessed October 2024. https://www.oxnard.gov/wp-content/uploads/WQR-Oxnard-CA-2021-English-Web.pdf.

TABLE 4.18-2: PROJECTED WATER SUPPLIES (AFY)						
Water Supplier	**Water Source**	**2025**	**2030**	**2035**	**2040**	**2045**
City Groundwater	Groundwater (not desalinated)	6,754	5,892	5,029	4,166	4,258
United Groundwater	Groundwater (not desalinated)	8,332	7,268	6,204	5,140	5,241
Calleguas	Purchased or Imported Water	9,630	7,364	6,987	7,387	6,169
Calleguas- Wheeled to PHWA	Other	917	1,857	2,704	3,581	3,581
ASR Recovered	Other	1,500	4,800	6,600	7,600	9,100
Recycled Water Pumpback Allocation	Other	1,500	3,000	4,000	5,000	5,000
Groundwater Allocation Used	Other	186	0	0	0	0
	Totals	**28,819**	**30,181**	**31,524**	**32,874**	**33,349**

Note: Projected water supply is based on reasonably available volume.

Source: City of Oxnard. Table 6-11. *Urban Water Management Plan*. Accessed December 2024. https://www.oxnard.gov/public-works/water/water-quality-reports.

Every urban water supplier is required to assess the reliability of water service provided to its customers under normal, dry, and multiple dry water years.[4] A 'Normal Year' represents the water supplies a supplier considers available during normal conditions, which could be a single year, or averaged range of years that most closely represents the average water supply available. A 'Single Dry Year' is the year that represents the lowest water supply available. 'Five-Consecutive Year Drought' is the driest five-year historical sequence for the water supplier, which may be the lowest average water supply available for 5 years in a row.

The City depends on a combination of imported and local supplies to meet its water demands and has taken numerous steps to ensure that it has adequate supplies. Water supplies available to the City are projected to meet full-service demands. The normal year water supply and demand projections are shown below in **Table 4.18-3: Normal Year Supply and Demand (AFY)**. The 2020 UWMP states that the City expects to meet demands under all water year scenarios between 2025

4 California Water Code Section 10635.

to 2045 during normal years, single dry year, and multiple dry years as shown in **Tables 4.18-3, 4.18-4,** and **4.18-5**.

TABLE 4.18-3: NORMAL YEAR SUPPLY AND DEMAND (AFY)

	2025	2030	2035	2040	2045
Supply Totals	28,819	30,181	31,524	32,874	33,349
Demand Totals	28,819	30,181	31,524	32,874	33,349
Difference	0	0	0	0	0

Source: City of Oxnard. Table 7-4. *Urban Water Management Plan*. Accessed December 2024. https://www.oxnard.gov/public-works/water/water-quality-reports.

TABLE 4.18-4: DRY YEAR SUPPLY AND DEMAND (AFY)

	2025	2030	2035	2040	2045
Supply Totals	30,055	31,475	32,876	34,284	34,779
Demand Totals	30,055	31,475	32,876	34,284	34,779
Difference	0	0	0	0	0

Source: City of Oxnard. Table 7-5. *Urban Water Management Plan*. Accessed December 2024. https://www.oxnard.gov/public-works/water/water-quality-reports.

TABLE 4.18-5: MULTIPLE DRY YEAR SUPPLY AND DEMAND (AFY)

		2025	2030	2035	2040	2045
First Year	Supply Totals	30,055	31,475	32,876	34,284	34,779
	Demand Totals	30,055	31,475	32,876	34,284	34,779
	Difference	0	0	0	0	0
Second Year	Supply Totals	28,311	29,533	30,837	31,978	
	Demand Totals	28,311	29,533	30,837	31,978	
	Difference	0	0	0	0	0
Third Year	Supply Totals	25,830	26,954	28,135	29,014	
	Demand Totals	25,830	26,954	28,135	29,014	
	Difference	0	0	0	0	0
Fourth Year	Supply Totals	26,062	27,204	28,387	29,113	
	Demand Totals	26,062	27,204	28,387	29,113	
	Difference	0	0	0	0	0
Fifth Year	Supply Totals	27,150	28,350	29,573	30,165	
	Demand Totals	27,150	28,350	29,573	30,165	
	Difference	0	0	0	0	0

Source: City of Oxnard. Table 7-6. *Urban Water Management Plan*. Accessed December 2024. https://www.oxnard.gov/public-works/water/water-quality-reports.

The Project Site has an existing water well, identified as State Well Number (SWN) 02N22W35K03S, CombCode MAUL. In February 2021, the Fox Canyon Groundwater Management Agency (FCGMA) established that SWN 02N22W35K03S had an initial allocation of 196.485 AFY of water. FCGMA approved the transfer of 51.300 AFY of water from SWN 02N22W35K03S to the City, which included 42.3 AFY of water needed for Del Sol High School (Area B) and an additional 9.0 AFY for the remaining southwest farm parcel (Area C). Thus, a total of 154.185 AFY of water allocations are available for the Project, consisting of the 9 AFY for Area C and 145.185 AFY for Area A.[5]

Wastewater

The City owns and operates its own wastewater collection and treatment system, the Oxnard Wastewater Treatment Plant (OWTP). The City collects, treats, and disposes of wastewater within its service area, which includes most of the City, the City of Port Hueneme, Naval Bases in Ventura County, and unincorporated areas of the County.[6] The OWTP includes raw sewage pumping, influent screening, primary sedimentation, an activated sludge secondary treatment process, effluent disinfection, and solids handling, including digestion. The OWTP has a permitted capacity of 31.7 million gallons per day (mgd), and an average daily flow of 16 mgd.[7] Recent historic average dry weather flows are approximately 20 mgd, with an expected increase to 27.5 mgd by 2040. The City consistently meets its discharge permit requirements; however, the City's wastewater treatment plant requires repair and replacement in the future in order to improve reliability and safety of the plant's operations.[8]

The wastewater collection system includes 384 miles of gravity sewer pipelines, 4.7 miles of pressurized pipelines and 15 lift stations.[9] Further information on the City's wastewater collection system can be found in the Public Works Integrated Master Plan (PWIMP) Wastewater Project Memorandum 3.1 Background Summary.[10] Effluent from the OWTP was previously discharged into the ocean. However, the City now utilizes the City's AWPF for the City's recycled water system, which

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5 Jensen Design & Survey, Inc. "Water Allocation." *Maulhardt/Stiles NECSP Sub-Neighborhood Plan Water Allocation and Demand Memorandum*. July 15, 2024. p. 2. See **Appendix P**.

6 City of Oxnard Wastewater Treatment Plant. *Fact Sheet, Los Angeles Region, Cal. Reg'l Water Qual. Control Bd., Order R4-2018-0140, NPDES No. CA0054097*. Oct. 11, 2018.

7 City of Oxnard. *Wastewater Division*. https://www.oxnard.gov/public-works/wastewater-division. Accessed November 2025.

8 City of Oxnard. *Public Works Integrated Master Plan Executive Summary*. September 2017. Accessed December 2024. https://www.oxnard.gov/wp-content/uploads/PWIMP-Exec-Summary-Report.pdf.

9 State Water Resources Control Board (SWRCB). *Sanitary Sewer Collection System Inspection Report: City of Oxnard Collection System*. May 3, 2012. Accessed November 2025. https://www.waterboards.ca.gov/water_issues/programs/sso/docs/audit/32oxi.pdf.

10 City of Oxnard. *Public Works Integrated Master Plan Executive Summary*.

further treats wastewater from the OWTP.[11] The City's AWPF was constructed utilizing microfiltration (MF), reverse osmosis (RO), and an advanced oxidation process (AOP). The City's AWPF is designed to produce advanced treated recycled water with an ultimate capacity of 25 million gallons per day (mgd); however, is currently equipped to produce 6.25 mgd.[12] Since operation, the AWPF has produced water for "unrestricted reuse," disinfected tertiary recycled water" or "Title 22 reclaimed water," which is used for non-potable supply such as landscape irrigation or industrial process water.[13]

Planning Area B of the Project Site includes the existing Del Sol High School. Del Sol High School's generated domestic wastewater is treated by the OWTP. According to the New High School No. 8 Project (SCH #2019029101) (Del Sol High School EIR), it was anticipated that the high school would produce an average sewage flow rate of 0.093 one cubic foot per second (cfs), and a peak sewage flow rate of 0.2839 cfs. The domestic wastewater generated by Del Sol High School discharges entirely to the Camino del Sol sewer.

As shown in **Figure 4.18-1: Utility Connections**, there is an existing 18-inch sanitary sewer connection on Rose Avenue and San Jacinto Drive. There is an optional 8-inch sanitary sewer connection on Williams Drive. The main connection for the southern part of the site is located on Rose Avenue, north of Camino Del Sol. There is also an existing sanitary sewer line on the southwest corner near Rose Avenue and Camino Del Sol.

Stormwater Conveyance

The City's storm water drainage system is maintained by the City's Public Works Department and Ventura County Watershed Protection District (VCWPD). According to the Preliminary Hydrology Report (**Appendix N**), the entire Project Site drains towards Camino del Sol on the south edge of the site. Runoff from Area A drains to temporary desilting basins located along Camino Del Sol before it connects to the public storm drain system. Area C also drains to Camino del Sol through small farm ditches and several inlets. Two reinforced concreate box (RCB) main drains in Camino del Sol convey storm water to the Rice Road Drain and eventually to the Pacific Ocean.[14] The drainage system serving Area B was previously evaluated in the New High School No. 8 Draft EIR, which concluded that post-development stormwater would be routed via inlets, curbing, and piping to on-site pretreatment and detention facilities before discharging at the rate of 1 cubic foot per second per

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11 City of Oxnard. "Advanced Water Purification Facility (AWPF)." Accessed November 2025. https://www.oxnard.gov/advanced-water-purification-facility.

12 California Regional Water Quality Control Board., Los Angeles Region. *Order No. R4-2008-0083 — Waste Recycling Requirements for the City of Oxnard GREAT Program*. June 12, 2008. Accessed November 2025. https://water.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/docs/9456_R4-2008-0083_WRR.pdf.

13 City of Oxnard. *Public Works Integrated Master Plan Executive Summary*.

14 Jensen Design & Survey, Inc. *Preliminary Hydrology Report*. See **Appendix N**.

acre (cfs/ac) to the Rice Road Drain along Camino Del Sol, consistent with the 1987 Rice Road Watershed Agreement.

The VCWPD has an agreement with the City that the Project Site can discharge only cfs/ac to the Rice Road Drain, limiting the 100-year outflow from subareas located north of Fifth Street. Both the RCB lines drain into the Rice Road Drain at its beginning point on Camino del Sol.[15]

Solid Waste

The City's Public Works Department Environmental Resources Division (ER) provides municipal solid waste (MSW) services to the City, including the Project area.[16] The ER's MSW services include collection, sorting, processing, and disposal for 34,154 residential properties and 16,378 commercial users 6 days a week.[17] Such services include collection, sorting, transportation, and transferring material to landfills in order to promote a clean, safe, and sustainable city. The ER provides MSW services in compliance with all local, State, and federal requirements. The ER recycles approximately 12,918 tons of material and 14,177 tons of organic waste.[18] The ER handles approximately 294,938 tons of MSW annually and has a workforce of 179 essential workers, fulfilling 529,443 hours per year.[19] Furthermore, the ER Division has invested approximately 60 million in capital equipment, facilities, and land including the Del Norte Regional Recycling and Transfer Station, and approximately 138 vehicles.[20] The City manages solid waste through the Del Norte Regional Recycling and Transfer Station, where waste is collected, sorted and then transferred to regional landfills for final disposal, including the Simi Valley Landfill and Toland Road Landfill. The Del Norte Regional Recycling and Transfer Station's permitted capacity is 2,779 tons per day.[21]

Solid waste that can't be recycled is taken to the Toland Road Landfill or the Simi Valley Landfill. The Toland Road Landfill is a Class III municipal landfill, is operated by the County Sanitation District, and previously had a permitted capacity of 1,500 tons of solid waste per day.

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15 Jensen Design & Survey, Inc. *Preliminary Hydrology Report*. See **Appendix N**.

16 City of Oxnard. "Environmental Resources." Accessed November 2025. https://www.oxnard.gov/public-works/environmental-resources.

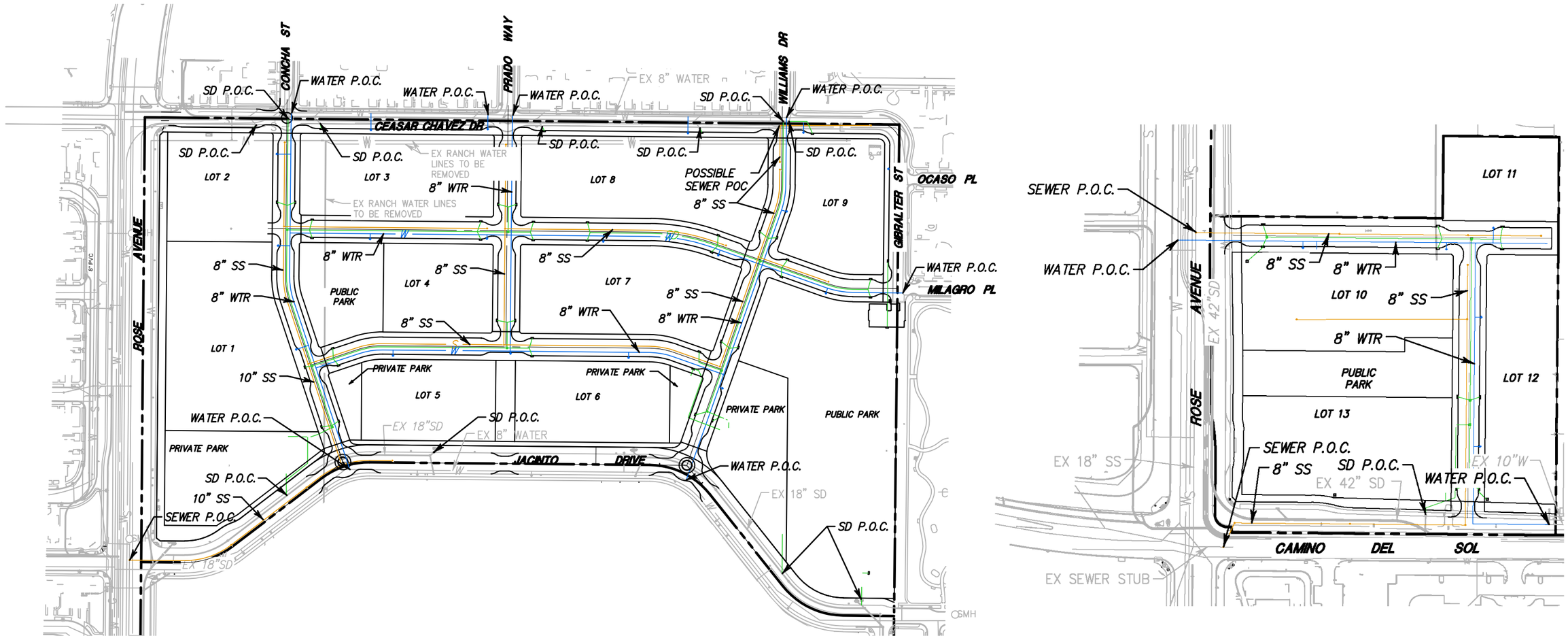
17 City of Oxnard. *Oxnard Announces Community Meeting Dates for Customers to Learn About City's Environmental Resources Services, Operational Costs, and Rate Adjustments*. November 14, 2023. Accessed November 2025. https://www.oxnard.gov/news/oxnard-announces-community-meeting-dates-for-customers-to-learn-about-citys-environmental-resources-services-operational-costs-and-rate-adjustments.

18 City of Oxnard. "Environmental Resources."

19 City of Oxnard. "Environmental Resources."

20 City of Oxnard. "Environmental Resources."

21 CalRecycle. *Del Norte Regional Recycling and Transfer*. "SWIS Facility/Site Activity Details." Accessed October 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/622?siteID=3967.



LEGEND

Proposed Water
Proposed Sewer
Proposed SD

0 75 150 300

APPROXIMATE SCALE IN FEET

SOURCE: Sanbell - June 2025.

FIGURE **4.18-1**

Meridian Consultants

Utility Connections

408-001-24

The Ventura Regional Sanitation District (VRSD) submitted a permit revision application to increase the permitted capacity to 2,864 tons per day and to extend the landfill's projected closure from 2027 to 2033.[22,23]

The Simi Valley Landfill is a private facility operated by Waste Management, Inc. with a daily capacity of 9,250 tons of solid waste. The projected closure date for the Simi Valley Landfill is March 31, 2063.[24]

Electricity

Electricity is typically a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy.[25] The delivery of electricity involves a number of system components, including substations and transformers, that lower transmission line power (voltage) to a level appropriate for use by customers.[26] The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh, or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours. According to the California Energy Commission's (CEC), the State of California consumed approximately 252,000 GWh of electricity in 2022, with electricity demand projected to rise to approximately 376,000 GWh in 2040, the furthest year of currently available projections.[27]

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22 Permitting and Assistance Branch Staff Report. *Revised Solid Waste Facilities Permit for the Toland Road Landfill*. May 2021. Accessed October 2025.

23 CalRecycle. *Toland Road Landfill*. "SWIS Facility/Site Activity Details." Accessed October 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/606?siteID=3952.

24 CalRecycle. *Simi Valley Landfill*. "SWIS Facility/Site Activity Details." Accessed October 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/608?siteID=3954

25 U.S. Energy Information Administration. "Electricity in the U.S." Accessed November 2025. https://www.eia.gov/energyexplained/electricity/electricity-in-the-us.php.

26 U.S. Energy Information Administration. "Electricity in the U.S."

27 California Energy Commission (CEC). *2023 Integrated Energy Policy Report Update*. Accessed August 2024. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2023-integrated-energy-policy-report.

Electrical power within the City is supplied by Southern California Edison (SCE), which serves approximately 15 million people in a 50,000-square-mile service area.[28] The SCE service area generated approximately 55,014,996 MWh of electricity in 2022.[29] SCE produces and obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power.

As shown in **Table 4.6-1** in **Section 4.6: Energy** of this Draft EIR, the existing development on the Project Site, Del Sol High School and associated parking lot consumes approximately 1,325,516 kWh per year as estimated by CalEEMod.

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network and, therefore, resource availability is typically not an issue. Natural gas satisfies almost one-third of the State's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as transportation fuel. Natural gas is primarily measured in terms of cubic feet (cf), or millions of cubic feet (MMcf), as well as in terms of British thermal units (Btu), and Therms.[30]

According to the CEC's California Energy Consumption Database, the State of California consumed approximately 11,711 million Therms (11,711,000 Mcf) of natural gas in 2022,[31] with demand projected to rise to 11,900 million Therms (11,900,000 Mcf) in 2040,[32] the furthest year of currently available projections.

SoCalGas is the natural gas purveyor within the City. The SoCalGas service area reaches 21.1 million consumers through 5.9 million meters in more than 500 communities, covering an area of

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28 Southern California Edison (SCE). "Our Service Territory." Accessed August 2024. https://www.sce.com/about-us/who-we-are/leadership/our-service-territory#:~:text=Our%20Service%20Territory&text=As%20one%20of%20the%20nation's,central%2C%20coastal%20and%20Southern%20California.

29 SCE. *Electric Company ESG/Sustainability Quantitative Information*. October 23, 2023. Accessed August 2024. https://download.edison.com/406/files/20239/EIX%20ESG_Template_Version_1_Quantitative_vF%202023%2010%2023.pdf?Signature=D%2BMaWBcyodbYSMQGTjWRYFaiOOo%3D&Expires=1725042673&AWSAccessKeyId=AKIAJX7XEOOELCYGIVDQ&versionId=VTDYff0IP5KsaSzISo0EOUroQydqppQo&response-content-disposition=attachment.

30 One Therm is equivalent to 100,000 British thermal units (BTU) or 100 kBTU. A Therm is approximately the energy equivalent of burning 100 cubic feet (1 cf) of natural gas. The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU.

31 CEC. "California Energy Consumption Database." *Gas Consumption by County*. Accessed August 2024. https://ecdms.energy.ca.gov/gasbycounty.aspx.

32 CEC. *Final 2023 Integrated Energy Policy Report Volume IV California Energy Demand Forecast*. Accessed August 2024. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2023-integrated-energy-policy-report.

approximately 24,000 square miles throughout Central and Southern California.[33] The SoCalGas planning area had a natural gas throughput of 2,428 Mcf in 2023, with throughput projected to be 2,055 Mcf and capacity projected to be 3,775 Mcf in 2040, the furthest year of currently available projections.[34]

Statewide natural gas demand is projected to decline at an annual rate of 0.7% each year through 2040.[35] The decline in demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, as well as Senate Bill (SB) 350 goals. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). By comparison, the 2022 California Gas Report projected an annual decline in demand of 1.1% over the forecast horizon.[36] The forecasted deaccelerated decline in throughput demand is being driven by reduced energy efficiency and updated fuel substitution assumptions.

As shown in **Table 4.6-1**, the existing development on the Project Site, Del Sol High School consumes approximately 3,562,458 kBTU of natural gas per year as estimated by the Air Quality, Greenhouse Gas, and Energy Study (**Appendix E**).

Telecommunications

The City has approximately 10 internet service providers (ISP) for commercial and residential use. These ISPs include Spectrum, AT&T, EarthLink, Frontier, Viasat, T-Mobile, Hughesnet, XNet WiFi, Starlink and Verizon.[37]

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33 Southern California Gas (SoCalGas). "Company Profile." Accessed August 2024. https://www.socalgas.com/about-us/company-profile.

34 California Gas and Electric Utilities. *2024 California Gas Report*. Accessed August 2024. https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf.

35 California Gas and Electric Utilities. *2024 California Gas Report*.

36 California Gas and Electric Utilities. *2022 California Gas Report*. Accessed August 2024. https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf.

37 BroadBandNow. "Internet Providers in Oxnard, California." Accessed December 2024. https://broadbandnow.com/California/Oxnard.

4.18.2 Regulatory Framework

Federal

Clean Water Act (CWA) and Safe Drinking Water Act

The federal CWA Section 401 regulates the discharges of pollutants into "waters of the US" from any point or non-point source.[38]

In 1972, the CWA was amended to prohibit the discharge of pollutants to waters of the United States unless the discharge is in compliance with a National Pollutant Discharge Elimination System permit.[39] The CWA focused on tracking point sources, primarily from wastewater treatment facilities and industrial waste dischargers, and required implementation of control measures to minimize pollutant discharges. The CWA was amended again in 1987 to provide a framework for regulating municipal and industrial stormwater discharges.[40] In November 1990, the US Environmental Protection Agency (US EPA) published final regulations that establish application requirements for specific categories of industries, including construction projects that encompass greater than or equal to 5 acres of land.[41] The Phase II Rule became final in December 1999, thus expanding regulated construction sites to those greater than or equal to 1 acre.[42] The regulations require that stormwater and non-stormwater runoff associated with construction activity which discharges either directly to surface waters or indirectly through municipal separate storm sewer systems (MS4s) must be regulated by an NPDES permit. In the State of California, the program is administered by the local Regional Water Quality Control Board (RWQCB).

The Safe Drinking Water Act (SDWA) was established in 1974 to protect the quality of drinking water in the U.S.[43] This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The SDWA authorizes the EPA to establish minimum standards to protect water systems to comply with these primary (health related) standards.[44] Under the Act, the US EPA also establishes minimum standards for state programs to protect underground sources of drinking water from endangerment by underground injection fluids.[45]

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38 United States Code, Title 33, Section 1341.

39 United States Code, Title 33, Section 1311(a); *see also* United States Code, Title 33, Section 1342.

40 *Water Quality Act of 1987*, Public Law 100-4, February 4, 1987.

41 Code of Federal Regulations, Title 40, Section 122.26.

42 Code of Federal Regulations, Title 40, Parts 9, 122, 123, and 124.

43 United States Code, Title 42, Sections 300f through 300j-26.

44 United States Code, Title 42, Section 300g-1.

45 United States Code, Title 42, Section 300h(b)(1); *see also* Code of Federal Regulations, Title 40, Section 144.1(b)(1).

Resource Conservation and Recovery Act (RCRA)

RCRA was enacted in 1976 and is the principal federal law in the United States governing the disposal of solid waste and hazardous waste.[46] The US EPA oversees waste management regulation pursuant to Title 40 of the Code of Federal Regulations. Under RCRA, however, states are authorized to carry out many of the functions of the federal law through their own hazardous waste programs and laws, if they are at least as stringent (or more so) than the federal regulations. Thus, the California Department of Resources Recycling and Recovery (CalRecycle) manages the State of California's solid waste and hazardous materials programs pursuant to US EPA approval.[47]

National Pollutant Discharge Elimination System Permit Program (NPDES)

The NPDES permit program was established in the CWA to regulate municipal and industrial discharges to surface waters of the United States.[48] Discharge from any point source is unlawful unless the discharge is in compliance with an NPDES permit.[49] Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities.[50]

State

California Water Boards

California's Water Boards consist of the State Water Resources Control Board (SWRCB) and the RWQCB.[51] The mission of the SWRCB is to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use for the benefit of

46 United States Code, Title 42, Sections 6901 through 6992k.

47 U.S. Environmental Protection Agency. *California—State and Local Partnerships: Waste Programs*. September 1993. Accessed November 2025. https://archive.epa.gov/region9/waste/archive/web/html/caprogram.html.

48 United States Code, Title 33, Section 1342(a).

49 United States Code, Title 33, Section 1311(a).

50 Code of Federal Regulations, Title 40, Section 122.44(a) through (d); *see also* Code of Federal Regulations, Title 40, Section 122.45(a).

51 SWRCB. "About Us." Accessed November 2025. https://www.waterboards.ca.gov/about_us/.

present and future generations.[52] Together they are authorized to implement the federal CWA in California. [53] The Project Site is located in Region 4, the Los Angeles Region.

State Water Resources Control Board General Construction Permit

The SWRCB has adopted a statewide Construction General Permit (Order No. 2012-0006-DWQ) for stormwater discharges associated with construction activity. These regulations prohibit the discharge of stormwater from construction projects that include one acre or more of soil disturbance. Construction activities subject to this permit include clearing, grading, and other disturbance to the ground, such as stockpiling or excavation, that results in soil disturbance of at least one acre of total land area. Individual developers are required to submit Permit Registration Documents (PRDs) to the SWRCB for coverage under this general permit prior to the start of construction.[54] The PRDs include a Notice of Intent (NOI), risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website. This general Construction General Permit requires all dischargers to (1) develop and implement a SWPPP, which specifies best management practices (BMPs) to be used during construction of the project; (2) eliminate or reduce non-stormwater discharge to stormwater conveyance systems; and (3) develop and implement a monitoring program of all specified BMPs. The two major objectives of the SWPPP are to (1) help identify the sources of sediment and other pollutants that affect the water quality of stormwater discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges.

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Control Act established the principal State program for water quality control.[55] The Porter-Cologne Water Quality Control Act also authorized the SWRCB to implement the provisions of the Federal Clean Water Act. The act divided the State into nine RWQCB areas. Each RWQCB implements and enforces provisions of the Porter-Cologne Act and the CWA subject to policy guidance and review by the SWRCB. The Porter-Cologne Act requires each RWQCB to develop a Basin Plan for all areas within its region. The Basin Plan is the basis for each RWQCB's regulatory programs.

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52 SWRCB. "About Us."

53 SWRCB. "About Us."

54 SWRCB. *Order No. WQ 2009-0009-DWQ, Attachment B – Permit Registration Documents to Comply with the Terms of the General Permit to Discharge Storm Water Associated with Construction Activity 1*. November 16, 2010.

55 California Water Code Section 13020.

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMPA) requires urban water suppliers that provide water for municipal purposes to more than 3,000 customers, or more than 3,000 acre-feet per year (AFY) of water, to prepare an Urban Water Management Plan (UWMP).[56] The intent of UWMP is to assist water supply agencies in water resource planning given their existing and anticipated future demands. A UWMP must include a water supply and demand assessment comparing the total water supply available to the water supplier with the total projected water use over a 20-year period. It is also mandatory that the management plans be updated every five years. In recognition of the State requirements, the City of Oxnard completed an update of the UWMP in October 2021.

State Water Quality Control Board Order No. 2006-0003-DWQ

Order No. 2006-0003-DWQ was adopted by the SWRCB on May 2, 2006. This order provides federal and State agencies, municipalities, counties, districts, and other public entities waste discharge requirements for sanitary sewer systems.

Sustainable Groundwater Management Act (2014)

In 2014, the State legislature passed the Sustainable Groundwater Management Act (SGMA).[57] SGMA requires the formation of local groundwater sustainability agencies (GSAs) by June 2017, which must assess conditions in their local water basins and adopt locally based management plans.[58] The act provides five to seven years for GSAs to create a Groundwater Sustainability Plan (GSP) and would have a 20-year implementation horizon with the opportunity for two five-year extensions if the agency were making progress towards sustainability. GSPs for critically over drafted high- and medium-priority basins were initially due to DWR by January 31, 2020. GSPs for the remaining high- and medium-priority basins were due to DWR by January 31, 2022.

California Water Code, Title 22

The California Water Code requires the Department of Health Services (DHS) to establish water reclamation criteria. In 1975, the DHS prepared Title 22 to fulfill this requirement. Title 22 regulates production and use of recycled water in California by establishing three categories of recycled water:

- primary effluent, which typically includes grit removal and initial sedimentation or settling tanks;
- adequately disinfected, oxidized effluent (secondary effluent), which typically involves aeration and additional settling basins; and

56 California Water Code Section 10610 et seq.

57 California Department of Water Resources. "Sustainable Groundwater Management Act." Accessed November 2025. https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management.

58 California Water Code Section 10723.8(a).

- adequately disinfected, oxidized, coagulated, clarified, filtered effluent (tertiary effluent), which typically involves filtration and chlorination.
- In addition to defining recycled water uses, Title 22 also defines requirements for sampling and analysis of effluent and requires specific design requirements for plants.

The Water Conservation Act of 2009 (SB X7-7)

SB X7-7 was enacted in November 2009, requiring all water suppliers to increase water use efficiency.[59] Specifically, the legislation sets an overall goal of reducing per capita urban water use by 20% by December 31, 2020. The state is required to make incremental progress towards this goal by reducing per capita water use by at least 10% by December 31, 2015. Effective 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for state water grants or loans.

Senate Bill 610 and Senate Bill 221

SB 610 and SB 221, amended into state law effective January 1, 2002, improve the linkage between certain land-use decisions made by cities and counties and water supply availability.[60] The statutes require detailed information regarding water availability and reliability with respect to certain developments to be included in the administrative record, to serve as the evidentiary basis for an approval action by the city or county on such projects. Under Water Code Section 10912[a], projects subject to the CEQA requiring a WSA include: residential development of more than 500 dwelling units; shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space; commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; hotel, motel or both, having more than 500 rooms; industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land or having more than 650,000 square feet of floor area; mixed-use projects that include one or more of the projects specified; or a project that would demand an amount of water equivalent to or greater than the amount required by a 500 dwelling units. A fundamental source document for compliance with SB 610 is the UWMP. The UWMP can be used by the water supplier to meet the standard for SB 610. SB 221 applies to the Subdivision Map Act, conditioning a tentative map on the applicant to verify that the public water supplier has sufficient water available to serve the proposed development.

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59 California Department of Water Resources. "SB X7-7: The Water Conservation Act of 2009." Accessed November 2025. https://water.ca.gov/Programs/Water-Use-And-Efficiency/SB-X7-7.

60 California Department of Water Resources. *Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001: To Assist Water Suppliers, Cities, and Counties in Integrating Water and Land Use Planning*. October 8, 2003.

Pursuant to the requirements of SB 610, a WSA was prepared for the Project (**Appendix P**) and includes a comprehensive assessment of historical demands, and a projection of future demands based on forecasted development of the City's service area.

CalReycle

This state agency performs a variety of regulatory functions pursuant to CCR Title 27 and other rules. Among other things, CalRecycle sets minimum standards for the handling and disposal of solid waste designed to protect public health and safety, as well as the environment. It is also the lead agency for implementing the State of California municipal solid waste program deemed adequate by the US EPA for compliance with RCRA.

Assembly Bill 341

Approved in 2011, AB 341 amended the California Public Resources Code to address solid waste diversion (i.e., recycling) targets to decrease the amount of waste going to landfills and thus extend their usable lives.[61] AB 341 requires cities and counties to include source reduction, recycling and composting in their integrated waste management plans. In addition, under AB 341 cities are required to "divert 50% of all solid waste from landfill disposal or transformation [e.g., incineration] by January 1, 2000, through source reduction, recycling and composting activities." By 2020, the target rises to "not less than 75% of solid waste."

Assembly Bill 939

AB 939 (California Integrated Solid Waste Management Act of 1989) established an integrated waste-management system that focuses on source reduction, recycling, composting, and land disposal of waste.[62] AB 939 requires every California city and county to divert 50% of its waste from landfills by the year 2000. Compliance with AB 939 is measured in part by comparing solid waste disposal rates for a jurisdiction with target disposal rates; actual rates at or below target rates are consistent with AB 939. AB 939 also requires California counties to show 15 years of disposal capacity for all jurisdictions in the county or show a plan to transform or divert its waste.

Assembly Bill 1327

The California Solid Waste Reuse and Recycling Access Act (Assembly Bill (AB) 1327requires areas to be set aside for collecting and loading recyclable materials in development projects.[63] The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable

61 California Public Resources Code Section 42649 et seq.

62 California Public Resources Code Section 40050 et seq.

63 California Public Resources Code Section 42900 et seq.

materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Senate Bill 1374

SB 1374 was signed in 2002.[64] SB 1374 requires jurisdictions to divert 50% to 75% of all construction and demolition waste from landfill and that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75% of all construction and demolition waste from landfills.

Senate Bill 1383

Senate Bill 1383 sets methane emissions reduction targets to be met through the reduction of organic waste disposed by 75% by 2025 and the rescue of 20% of currently disposed surplus food by 2025.[65] Compliance with SB 1383 requires residential developments to have organic waste services provided. Local jurisdictions must educate residents on proper use of organic waste services.

Senate Bill 1826

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses.[66] Additionally, each jurisdiction is to identify a multitude of information, including barriers to organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling facilities. AB 1826 defines "organic waste" as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste.[67] It also defines a "business" as a commercial or public entity, including, but not limited to, a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units.[68] In January 2017, businesses that generated 4 cubic yards or more of organic waste per week were subject to this requirement. In September 2020, CalRecycle reduced this threshold to 2 cubic yards of solid waste (i.e., total of trash, recycling, and organics) per week generated by covered businesses.

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64 California Public Resources Code Section 42919.

65 California Health and Safety Code Sections 39730.5 through 39730.8; California Public Resources Code Part 3, Division 30, Chapter 13.1, commencing with Section 42652.

66 California Public Resources Code Section 42649.82.

67 California Public Resources Code Section 42649.8(d).

68 California Public Resources Code Section 42649.8(a).

Regional and Local

Regional Water Quality Control Board (RWQCB)

The Porter-Cologne Act, Section 13000, directs each RWQCB to develop a water quality control plan (Basin Plan) for all areas within its region. The Basin Plan is the basis for each RWQCB's regulatory program. The City and Project Site are part of the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB) (Region 4). The LARWQCB has adopted a Basin Plan in accordance with criteria contained in the CWA, Porter-Cologne Act, and other pertinent State and federal rules and regulations. The intent of the Basin Plan is to preserve and enhance water quality and protect the beneficial uses of all regional waters. The intended beneficial use of water determines the water quality objectives. For example, the quality requirements for irrigation water are different from drinking water. The LARWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements for appropriate persons and groups; these can include individuals, communities, or businesses whose waste discharges may affect water quality. These requirements can be either State Waste Discharge Requirements for discharge to land, or federally delegated NPDES permits for discharges to surface water. Discharges are required to meet water quality objectives and, thus, protect beneficial uses.

City of Oxnard Urban Water Management Plan (UWMP)

The City is a water supplier and is required to prepare a UWMP in accordance with the California UWMPA. The UWMPA requires every "urban water supplier" to prepare and adopt a Plan to provide a legal framework for long-term water management to ensure sufficient water supplies to meet existing and future demands. It also requires periodic review of the Plan by the City at least once every five years and any amendments or changes which are indicated by the review. The latest 2020 UWMP was prepared in 2021 and provides the City with a reliable action plan for long-term resource planning to ensure adequate water supplies are available to meet existing and future water supply needs. In addition, the 2020 UMWP incorporates water supply reliability determinations resulting from potential prolonged drought, regulatory revisions, and/or changing climatic conditions.

City of Oxnard Public Works Integrated Master Plan (PWIMP)

The City's Public Works Department developed a PWIMP. The PWIMP addresses the future planning need for all major utilities within the City's jurisdiction, including water, wastewater, recycled water, and stormwater. The PWIMP develops long-term recommendations for policies, programs, and projects to successfully address challenges and opportunities in an integrated way.[69]

69 City of Oxnard. *Public Works Integrated Master Plan Executive Summary*.

City of Oxnard General Plan

The following goals and policies in the City of Oxnard 2030 General Plan are applicable to utilities:

GOAL CD-8 Sensible urban development and redevelopment based on the City's ability to provide necessary governmental services and municipal utilities.

Policy CD-8.10: ***Timing of Large-Scale Development***

Consider at an early stage the infrastructure investment needs of largescale developments in order to evaluate these needs as part of long-range water supply, conveyance, wastewater, and other relevant planning.

GOAL ICS-1 Provision of adequate facilities and services that maintain service levels, with adequate funding.

Policy ICS-1.2: ***Development Impacts to Existing Infrastructure***

Review development proposals for their impacts on infrastructure (e.g., sewer, water, fire stations, libraries, streets) and require appropriate mitigation measures to ensure that proposed developments do not create substantial adverse impacts on existing infrastructure and that the necessary infrastructure will be in place to support the development.

Policy ICS-1.4: ***Infrastructure Conditions of Approval***

New development should not be approved unless:

- *The applicant demonstrates adequate public services and facilities are available;*
- *Infrastructure improvements incorporate a range of feasible measures that can be implemented to reduce all public safety and/or environmental impacts associated with the construction, operation, or maintenance of any required improvement;*
- *Infrastructure improvements are consistent with City infrastructure master plans; and*
- *Required infrastructure needed for future new development is self-funded.*

GOAL ICS-11 Water supply, quality, distribution, and storage adequate for existing and future development.

Policy ICS-11.5: ***Sustainability of Groundwater Supply***

Support the policies of the Fox Canyon Groundwater Management Agency to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.

Policy ICS-11.6: ***Water Conservation and/or Recycling Connection as Mitigation***

Require the use of water conservation offset measures (efficient low flow fixtures and irrigation systems, drought tolerant landscaping, leak detection programs, water audits, and public awareness and education programs) and/or proportional contributions to recycled water production and/or conveyance infrastructure related to the GREAT Program as mitigation for water supply shortage as determined by a Water Supply Assessment, CEQA documentation, or similar analysis as part of new or master plan development review.

Policy ICS-11.7: ***Water Wise Landscapes***

Promote water conservation in landscaping for public facilities and streetscapes, residential, commercial and industrial facilities and require new developments to incorporate water conserving fixtures (low water usage) and water-efficient plants into new and replacement landscaping.

Policy ICS-11.12: ***Water for Irrigation***

Require the use of non-potable water supplies for irrigation of landscape and agriculture, whenever available.

Policy ICS-11.13: ***Water Neutral Policy and Urban Water Management Plans***

Incorporate the City's Water Neutral Policy regarding new development into the 2010 Urban Water Management Plan and develop appropriate ordinances, policies, and/or programs to fully implement the policy.

GOAL ICS-12 Adequate capacity at the City Waste Water Treatment Plant to accommodate existing and future development.

Policy ICS-12.3: ***Wastewater Discharge Monitoring***

Monitor and ensure that discharges comply with approved permits.

Policy ICS-12.4: ***Wastewater Discharge***

Treat all wastewater in compliance with approved discharge permits.

Policy ICS-12.6: ***Timing of Future Development***

Impose conditions in order to ensure adequate wastewater capacity for proposed new development.

GOAL ICS-13 Adequately sized storm drain systems and discharge treatment, certified levees, and implementation of appropriate National Pollutant Discharge Elimination System (NPDES) permits and regulations.

Policy ICS-13.2: ***Adequate Storm Drains and NPDES Discharge Treatment***

Provide storm drainage facilities with sufficient capacity to protect the public and property from the appropriate storm event and strive to meet storm water quality discharge targets set by NPDES and related regulations.

Policy ICS-13.3: ***Stormwater Detention Basins***

Design stormwater detention basins to ensure public safety, to be either visually attractive or unobtrusive, provide temporary or permanent wildlife habitats, and recreational uses where feasible in light of safety concerns.

Policy ICS-13.4: ***Low Impact Development***

Incorporate low impact development (LID) alternatives for stormwater quality control into development requirements. LID alternatives include: (1) conserving natural areas and reducing imperviousness, (2) runoff storage, (3) hydro-modification (to mimic pre-development runoff volume and flow rate), and (4) public education.

GOAL ICS-14 Reduced solid waste and increased recycling.

Policy ICS-14.1: ***Waste Reduction***

Continue to implement and participate in appropriate source reduction and recycling programs to meet mandated waste reduction levels as specified within the California Integrated Waste Management Act of 1989, promote the maximum feasible use of solid waste recycling and composting of organic waste, and strive to reduce commercial and industrial waste.

Policy ICS-14.2: ***Use of Recycled Materials***

Use recycled materials and employ recycling techniques for City operations to reduce demand for solid waste disposal capacity, where feasible, and encourage recycling of construction and demolition materials generated at residential and commercial new construction and renovation sites.

Policy ICS-14.3: ***New Development Requirements***

Continue to require developers and operators to employ practices that reduce the quantities of waste generated and promote resource recovery during construction, demolition, and operation.

GOAL ICS-17 Adequate and efficient public utilities that meet the needs of residents of the City.

Policy ICS-17.1: ***Electric Facilities***

Ensure that public and private, replacement and/or refurbished, electric generation and/or transmission facilities are built in accordance with the California Coastal Commission Sea Level Rise Policy Guidance, California Public Utilities Commission and/or California Energy Commission policies and regulations and incorporate feasible solar, wind, and other renewable sources of energy.

Policy ICS-17.3: ***Promoting Renewable Energy Production***

Encourage the use of renewable solar, wine, and other electric generation technologies instead of new or expansion of fossil fuel-based generation facilities.

Policy ICS-17.4: ***Service Extension***

Coordinate with gas and electricity providers for the extension of gas and electrical facilities.

Policy ICS-17.5: ***Undergrounding of Utility Lines***

Require undergrounding of utility lines in new development, except where it is not feasible due to electrical transmission load or other operational issues.

GOAL ICS-18 Expanded communication system services to improve personal convenience for residents of the City.

Policy ICS-18.1: ***Telecommunications Services***

Work with telecommunications providers to ensure that residents and businesses have access to telecommunications services, including broadband service. To maximize access to inexpensive telecommunications services, the City shall encourage marketplace competition from multiple service providers.

GOAL ER-5 Well managed water supply and wastewater treatment programs that together meet expected demand, prevent groundwater overdraft, and ensure water quality.

Policy ER-5.1: ***Wastewater Treatment***

Treat all wastewater in compliance with approved discharge permits.

Policy ER-5.3: ***Reducing Dependence on Groundwater***

The City shall maintain a minimal dependence on Basin 4A groundwater consistent with the Groundwater Resource Encroachment and Treatment (GREAT) Program and support the policies of the Fox Canyon Groundwater Management Agency to protect, enhance, and replenish the aquifers underlying the Oxnard Plain.

Policy ER-5.4: ***Wastewater Monitoring***

Monitor all wastewater discharges on a periodic basis to ensure that discharges comply with approved permits.

4.18.3 Significance Thresholds

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

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

c) Would additional wastewater conveyance or treatment capacity be required to serve project demand and existing commitments?

d) Would the project include non-residential wastewater discharges that are subject to local limits and pretreatment requirements?

e) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

f) Would the project conflict with federal, state, or local management and reduction statutes or regulations related to solid waste?

4.18.4 Methodology

Potential impacts to utilities and service systems were evaluated by comparing projected utility demand, including that generated by development under the proposed Sub-Neighborhood Plan, to the capacity of existing infrastructure to determine whether the Project would require the construction of new or expanded utility facilities or the relocation of existing infrastructure.

In accordance with the requirements of SB 610, a WSA was prepared for the Project (**Appendix P**). The WSA provides a comprehensive analysis of existing and future water supplies, historical and projected demands, and confirms that adequate water supplies are available to serve the Project under normal, single-dry, and multiple-dry-year conditions within the City's water service area. A Preliminary Hydrology Report (**Appendix N**) was also prepared to evaluate on-site drainage and determine whether the Project's design meets applicable City and County stormwater management and LID requirements.

4.18.5 Project Impacts

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact.

Water

As detailed below in *threshold b*, the Project Site is within the City's water service area. Water use during construction would be minimal and temporary. The Project Site was planned for development in the City's PWIMP to use approximately 253.8 AFY and the City would have adequate water supply for its service area under normal, single dry, and multiple dry years until 2045. The Project Site has a groundwater allocation of approximately 196.49 and the proposed Sub-Neighborhood Plan would have a water demand of approximately 192.25 AFY, resulting in a buffer of about 4.24 AFY. As such, the proposed Sub-Neighborhood Plan would use less water than projected in the PWIMP and would have adequate supplies during normal, single-dry, and multiple-dry year conditions. Therefore, development of the proposed Sub-Neighborhood Plan would not require the relocation, expansion, or new development of water facilities, resulting in less than significant impacts.

Wastewater

As detailed below in threshold c, the Project Site is served by the existing wastewater system provided by the City and treated at OWTP. The proposed Project would generate approximately 180,500 gpd or 202-acre feet per year AFY of wastewater, as shown in **Table 4.18-7: Projected Sewage Generation** below. The OWTP is currently operating below capacity, as the OWTP has a permitted capacity of 31.7 mgd, but has an average daily flow of 16 mgd. As OWTP is currently

operating below capacity, the City's wastewater system would be able to serve the proposed Project. As such, the proposed Project's increase in wastewater would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.

Stormwater Conveyance

Construction

As discussed in **Section 4.10**: **Hydrology and Water Quality** of this Draft EIR, project construction would comply with the requirements of the SWRCB's Construction General Permit, which would include the preparation and implementation of a SWPPP. The SWPPP would include construction best management practices (BMPs) to reduce impacts to control and direct on-site surface runoff to ensure that stormwater runoff from the construction site does not exceed the capacity of the stormwater drainage systems. Therefore, construction of the proposed Sub-Neighborhood Plan would not require the relocation, expansion, or construction of new stormwater facilities.

Operation

As detailed above, the entire Project Site drains to Rice Road Drain south of the Project Site. VCWPD and the City have an agreement to ensure that the Project Site would be limited to 1 cfs/acre to Rice Road Drain to prevent downstream flooding.

As shown in **Figure 4.18-1**, the proposed Sub-Neighborhood Plan would install storm drain infrastructure throughout the Project Site's right-of-way (ROW) that would connect to the surrounding stormwater system. All on-site storm drain pipes would be reinforced concrete pipes (RCPs) 18 inches in diameter or larger. As detailed in the Preliminary Hydrology Report (**Appendix N**), Areas A and C of the Project Site totals 49.9 cfs for 56.3 acres, consistent with the 1 cfs/ac discharge limit established under the Rice Road Watershed Agreement. Area B was calculated to have a discharge of 47.4 cfs for 50.7 acres, also consistent with the 1 cfs/ac standard. When combined, stormwater discharges from the entire Project Site equal approximately 97.3 cfs over 107 acres, demonstrating that the Project Site complies with the 1 cfs/ac maximum allowable discharge rate established by the Rice Road Watershed Agreement. Therefore, operation of the proposed Sub-Neighborhood Plan would not require the relocation, expansion, or construction of new stormwater facilities.

Electric Power

Construction

During construction, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. As discussed in **Section 4.6**: **Energy**, a total of approximately 517.6 kWh of electricity is anticipated to be consumed during construction. The

Project's increased demand during construction will be adequately served by the existing SCE electrical facilities. Total electricity demand in SCE's service areas is forecast to increase by approximately 23,000 GWh between 2019 and 2035. The increase in electricity demand from the construction of the Project would be temporary and would represent an insignificant percentage increase (i.e., less than a fraction of 1%) compared to overall demand in SCE's service area. Additionally, Title 24 requirements would apply to construction lighting, which includes limits on the wattage allowed per specified area for energy conservation. Therefore, construction of the proposed Sub-Neighborhood Plan would not require the relocation, expansion, or construction of new electric facilities.

Operation

Building operation and site maintenance (including landscape maintenance) would result in the consumption of electricity. As shown in **Table 4.6-5**, the proposed Sub-Neighborhood Plan is estimated to increase electricity demand by 6,327,150 kWh (6.3 GWh) per year due from the increase in development intensity. In 2022, SCE consumed 85870 GWh of electricity,[70] and SCE estimates that electricity consumption within its planning area will be approximately 126,111 GWh annually by 2033, when the proposed Sub-Neighborhood Plan would be fully built out.[71] The proposed Project would account for less than 0.01% of the 2033 annual consumption in SCE's planning area. As such, the Project would account for a negligible portion of the projected annual consumption in SCE's planning area. Additionally, the proposed Project would comply with applicable energy efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CALGreen standards, and as such, would be more efficient than the existing development on the Project Site. Therefore, operation of the proposed Sub-Neighborhood Plan would not require the relocation, expansion, or construction of new electric facilities.

Natural Gas

Construction

No natural gas is anticipated to be used for the construction of the proposed Sub-Neighborhood Plan. Therefore, construction of the proposed Sub-Neighborhood Plan would not require the relocation, expansion, or construction of new natural gas facilities.

Operation

Building operation would result in the consumption of natural gas. As shown in **Table 4.6-5**, the estimated natural gas consumption for the proposed Project is approximately 5,823,635 kBTU (6.05

70 CEC. "Electricity Consumption by Entity." Accessed March 2025. https://ecdms.energy.ca.gov/elecbyutil.aspx.

71 CEC. "California Energy Demand 2023-2040. CED 2023 Baseline Forecast – SCE." Accessed September 2024. https://www.energy.ca.gov/data-reports/reports/2023-integrated-energy-policy-report/2023-iepr-workshops-notices-and-2.

MMcf) per year. SoCalGas consumed 5,026 million Therms (5,020,600 MMcf) of natural gas in 2022.[72] Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas supply within SoCalGas' planning area will be approximately 1.38 million MMcf per year in 2033.55 The proposed Project would account for less than 0.01% of the 2032 annual forecasted supply in SoCalGas' planning area. Therefore, operation of the proposed Sub-Neighborhood Plan would not require the relocation, expansion, or construction of new natural gas facilities.

Telecommunications

The Project Site is located in a portion of the City that is served by several existing telecommunication services. The proposed Project would connect to existing telecommunications infrastructure and providers; however, no substantial additional infrastructure would need to be installed or relocated to provide telecommunication services. Therefore, operation of the proposed Sub-Neighborhood Plan would not require the relocation, expansion, or construction of new natural gas facilities.

As discussed above, the proposed Sub-Neighborhood Plan would not require the relocation, expansion or new development of water, wastewater treatment, stormwater drainage, electric, natural gas, or telecommunication facilities. As such, impacts would be less than significant.

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

Less than Significant Impact.

Construction

Short-term demand for water may occur during excavation, grading, and construction activities on site. Construction activities would require water primarily for dust mitigation purposes, mixing concrete, cleaning equipment, and other related construction activities. These activities would occur incrementally throughout construction of the proposed Project and are temporary in nature. Water from the existing potable water lines in the vicinity of the Project Site would be used. Based on an estimated water use of 170,026 gallons per day for the construction of proposed Project, the temporary construction water use will be less than the existing water consumption at the Project Site. It is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project.[73] Overall, short-term construction

72 CEC. "Gas consumption by Entity." Accessed March 2025. https://ecdms.energy.ca.gov/gasbyutil.aspx.

73 Estimated water used during construction based is based on a Project Size of 56.3 acres (Areas A and C) and a water usage rate of 3,020 gallons per acre per day as estimated by the Air & Waste Management Association, *Air Pollution Engineering Manual*, 1992 Edition.

activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. Therefore, impacts would be less than significant.

Operation

Under Water Code Section 10912[a], CEQA projects that develop 500 or more dwelling units would require a WSA to be created. The proposed Sub-Neighborhood Plan would allow development of up to 950 residential dwelling units, approximately 40,000 square feet of retail and general commercial space, public parks, and associated circulation and landscaping improvements. Therefore, a WSA was prepared for the proposed Sub-Neighborhood Plan by Meridian Consultants, LLC (**Appendix P**). The WSA compared the City's water supplies to the proposed Project's estimated water demand, using data from the City's UWMP, PWIMP and water suppliers that provide forecasted water supply and demands for the City's service area.

As detailed in the WSA, the Project Site is within City's service area, which sources its water from imported surface water from Calleguas, local groundwater from United, and local groundwater from City wells. Development of the Project Site was included in the City's 2030 General Plan and the 2015 PWIMP, both of which are incorporated into the 2020 UWMP. The PWIMP assumed the Project Site would be developed with 500 residential units and approximately 6.3 acres of commercial uses that would have a water demand of approximately 253.796 AFY. As shown in Tables 4.18-3 to 4.18-5 above, the City's would have adequate water supplies for anticipated water demand of existing and future planned developments within the City's service area until 2045.

The northeastern portion of Project Site has an existing water well, SWN 02N22W35K03S, had an initial allocation of 196.485 AFY of water. FCGMA approved the transfer of 51.300 AFY of water from the well to the City, which included 42.3 AFY of water needed for Del Sol High School in Area B and an additional 9.0 AFY for Area C.[74] Thus, a total of 154.185 AFY of water allocations are available for the proposed Sub-Neighborhood Plan, consisting of the 9 AFY for Area C and 145.185 AFY Area A.[75]

As shown in **Table 4.18-6: Projected Water Demand for Proposed Project**, the annual total water demand for Areas A and C was determined using land use–specific demand factors from the City's PWIMP, AB 1668/SB 606 indoor efficiency standards, and Model Efficient Water Landscape Ordinance (MEWLO) landscape guidelines, resulting in approximately 149.950 AFY.

TABLE 4.18-6: PROJECTED WATER DEMAND FOR PROPOSED PROJECT

Land Use	Units (DU or AC)	Unit Usage (AFY/DU or AFY/AC)	Annual Usage (AFY)
Areas A & C			

74 Jensen Design & Survey, Inc. "Water Allocation."

75 Jensen Design & Survey, Inc. "Water Allocation."

TABLE 4.18-6: PROJECTED WATER DEMAND FOR PROPOSED PROJECT			
Land Use	**Units (DU or AC)**	**Unit Usage (AFY/DU or AFY/AC)**	**Annual Usage (AFY)**
Residential	950 DU 2,064 persons	0.0616 AFY/persona	127.130 AFY
Commercial	0.918 ac	2.240 AFY/acb	2.057 AFY
Landscaping (non-Parks)	6.309 ac	1.351 AFY/acc	8.524 AFY
Landscaping (Parks)	14.57 Acres	0.840 AFY/acd	12.239 AFY
	Subtotal Areas A & B		149.950 AFY
Area B			
High School			42.300 AFY
Total Projected Water Demand:			**192.25 AFY**

Sources: Jensen Design & Survey, Inc. "Water Allocation." *Maulhardt/Stiles NECSP Sub-Neighborhood Plan Water Allocation and Demand Memorandum*. July 15, 2024. (p. 5). (See **Appendix P**).

Notes:
[a] *AB 1668/SB 606, which mandates a per person consumption of 55 gpd.*
[b] *City of Oxnard. Memorandum 2.2, Table 9. "2015 Public Works Integrated Master Plan." Accessed October 2024.*
[c] *ETWU per MEWLO Guidelines, assuming a blend 15% lawn area and 85% drought tolerant areas on all development lots.*
[d] *City of Oxnard. Memorandum 2.2, Table 5. "2015 Public Works Integrated Master Plan." Accessed October 2024.*

Including Del Sol High School's 42.3 AFY, the total water demand for the proposed Sub-Neighborhood Plan would be approximately 192.25 AFY. Given the Project Site's groundwater allocation of 196.49 AFY, the proposed Sub-Neighborhood Plan would have a buffer of about 4.24 AFY. Therefore, the proposed Sub-Neighborhood Plan would be adequately supplied by water by allocated groundwater. As the proposed Sub-Neighborhood Plan is under the Project Site's PWIMP water demand of 253.8 AFY, the proposed Sub-Neighborhood Plan would have adequate water in normal, single dry and multiple dry years, resulting in less than significant impacts.

c) Would additional wastewater conveyance or treatment capacity be required to serve project demand and existing commitments?

Less than Significant Impact.

Construction

Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connections to public infrastructure. Upsizing of adjacent sewer mains would not be required. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts would be short-term in duration (i.e. months). Therefore, the impacts from construction of improvements to the existing sewer system would be less than significant.

Operation

The Project Site is in a developed and urbanized portion of the City that is served by the existing wastewater system provided by the City. As described above, the City owns and operates its own

wastewater collection and treatment system, the OWTP, which has permitted capacity of 31.7 mgd, an average daily flow of 16 mgd, a historic average dry weather flow of approximately 20 mgd, and an expected increase to 27.5 mgd by 2040. According to the City's latest wastewater generation information in 2020, the City collected a volume of approximately 17 mgd (19,088 AFY) of wastewater within the City's service area.[76]

Development of the Area A and C would result in an increase in the amount of wastewater compared to the existing uses on the Project Site. Although the City does not maintain standard wastewater generation factors, the proposed Sub-Neighborhood Plan applies the factors used in the City-certified Teal Club Specific Plan EIR (SCH# 2012051080), which analyzed a similar mixed-use development within the City.[77] As shown in **Table 4.18-7: Projected Sewage Generation**, Areas A and C would generate approximately 66,452 gpd, or 0.066 mgd of wastewater.

The OWTP has a current surplus capacity of approximately 15.7 mgd for average daily flow and 11.7 mgd for historic average dry weather flow. The proposed Project's estimated 0.066 mgd average daily flow and 0.12 mgd of dry weather flow would account for approximately 0.42% and 1.03%, respectively, of the OWTP's surplus capacity.

TABLE 4.18-7: PROJECTED SEWAGE GENERATION

Land Use	Acreage	Wastewater Duty Factor (gpad)	Wastewater Flow (gpd)	Wastewater Flow (gpm)[2]
Multi-Family Residential	27.4	2,380	65,212.00	45.29
Commercial	0.92	1,350	1,239.70	.086
Total Average Daily Flow			**66,451.70**	**46.15**
Total Peak Dry Weather Flow (PDWF = 1.81)[1]			**120,277.55**	**83.53**
RDI/I[3]	28.32	600	16,990.98	11.80
Total Peak Wet Weather Flow			**137,268.53**	**95.33**

Source: Kennedy/Jenks Consultants, Teal Club Development Infrastructure Review – Evaluation of Wastewater Facilities, May 2007.
gpad = gallons per acre per day gpd = gallons per day gpm = gallons per minute RDI/I = Rainfall Dependent Inflow/Infiltration
Notes:
1The peak dry weather factor was calculated using the following equation as given in the 2005 Draft Oxnard Wastewater Master Plan Update: Peak Dry Weather Factor = 1.73 x (Average Dry Weather Flow Rate)-0.0337. This produced a Peak Dry Weather Factor of 1.81 for the average day flow resulting in a Peak Dry Weather Flow of 312 gpm.
2 The gallons per minute was calculated using by dividing gallons per day by 1,440 (the number of minutes in a day).
3 RDI/I (27.4 + 0.9183 = 28.3183 ac at 600 gpad).

76 City of Oxnard. "Water Supply Characterization." *Urban Water Management Plan*. p. 6-14.

77 City of Oxnard. *Teal Club Specific Plan: Recirculated Draft Environmental Impact Report. SCH No. 2012051080. City of Oxnard EIR No. 2015-01*. December 2021.

As shown in **Figure 4.18-1**, the proposed Sub-Neighborhood Plan would install sewer lines throughout the Project Site's right-of-way (ROW) that would connect to the surrounding sewer system. The proposed Project's sewer lines would be reviewed by the City prior to development to ensure that there is adequate sewer conveyance for the proposed Project's wastewater generated. Therefore, there would be less than significant impacts related to wastewater conveyance and treatment.

d) Would the project include non-residential wastewater discharges that are subject to local limits and pretreatment requirements?

Less than Significant Impact.

The proposed Project would develop up to a maximum of 40,000 square feet of retail and general commercial land uses that would serve the proposed neighborhood. The commercial uses proposed (approximately 40,000 square feet of retail and general commercial space) would generate typical domestic-strength wastewater, such as from restrooms, janitorial sinks, and small-scale food or retail operations. These discharges would not contain industrial-strength pollutants or process wastewater subject to the City's Industrial Pretreatment Program or local discharge limits under Oxnard Municipal Code Chapter 22, Article VII (Sewer Use Regulations). Additionally, the proposed Project would implement BMPs in accordance with the SWPPP and MS4 permit requirements to ensure adequate pretreatment requirements. Therefore, impacts would be less than significant.

e) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact.

Construction

In response to State-mandated waste reduction goals set forth in CalGreen, and as part of the City's commitment to sustainable development, the City requires that certain demolition and/or construction Projects to divert at least 50% of waste either through reuse or recycling. Chapter 19 of the City's Municipal Code requires a construction and demolition recycling plan which instructs any new development to divert construction and demolition debris from landfills to the highest percentage feasibly possible by recycling or reuse of materials. The proposed Project would be required to develop and submit this plan for approval and include the estimated volume or weight of construction and demolition debris to be generated.

Demolition and disposal of demolition debris would be conducted in accordance with applicable laws and regulations, including Oxnard Municipal Code Chapter 19, Sections 19-151, 19-180, and the 2022 California Green Building Standards Code with regard to the diversion of recyclable material away from landfills, as well as South Coast Air Quality Management District Rule 403 regarding the generation of fugitive dust at construction sites.

The amount of construction debris requiring disposal can be accommodated at the landfills serving the City given their current capacities. Impacts would be less than significant.

Operation

The City's ER is responsible for the safe and efficient collection, processing, transfer, and disposal services of all solid waste for residents and commercial businesses within the City. The development that would occur pursuant to the proposed Project would result in an increase in the amount of solid waste in comparison to the existing uses on the Project Site. As shown in **Table 4.18-8: Projected Solid Waste Generation**, the development that would occur pursuant to the proposed Project would generate approximately 4 tons per day or 1,460 tons of solid waste per year. The Del Norte Regional Recycling and Transfer Station's permitted capacity is 2,779 tons per day.[78] The Toland Road Landfill has a permitted capacity of 2,864 tons per day, and the Simi Valley Landfill has a permitted capacity of 9,250 tons of solid waste per day.[79,80] The proposed Project's increase in solid waste, approximately 4 tons per day, would represent approximately 0.14%, 0.14% and 0.04% of the capacities of the Del Norte Regional Recycling and Transfer Station, the Toland Road Landfill, and Simi Valley Landfill, respectively.

This estimate is conservative as it does not factor in recycling, industrial composting, or other waste diversion programs. Given the City's current solid waste processing capacity, the proposed Project would not generate solid waste in excess of State or local infrastructure or standards. Furthermore, the proposed Project would adhere to applicable regulations associated with solid waste. For these reasons, the proposed Project could be adequately served by the solid waste disposal system, and the proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals. Impacts would be less than significant.

TABLE 4.18-8: PROJECTED SOLID WASTE GENERATION

Type of Use	Unit	Quantity	Waste Generation Ratea (lb./unit/day)
Residential	du	950	4/du
Commercial	sq ft	40,000	5/1000 sq ft/ day
Open Space	acres	12.9	.007 lb/sq ft/day ww
Total Daily Estimate			**7,933 lbs./day**

Note: du=dwelling unit; sq ft= square feet
[a] CalRecycle, Estimated Solid Waste Generation R

78 CalRecycle. *Del Norte Regional Recycling and Transfer*. "SWIS Facility/Site Activity Details."

79 CalRecycle. *Toland Road Landfill*. "SWIS Facility/Site Activity Details."

80 CalRecycle. *Simi Valley Landfill*. "SWIS Facility/Site Activity Details."

f) Would the project conflict with federal, state, or local management and reduction statutes or regulations related to solid waste?

Less than Significant Impact.

The proposed Project would be consistent with the applicable regulations associated with solid waste, such as Ordinance No. 2373 and Ordinance 3007, which pertain to the regulation of solid waste management for the City. The proposed Project would also comply with AB 939, AB 341, AB 1374, AB 1826, and SB 1383. As the proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

4.18.6 Cumulative Impacts

The 2030 General Plan found that implementation of the 2030 General Plan would increase utility services, including water, wastewater, storm water drainage, solid waste, and other utility facilities. The 2030 General Plan identified that future projects would be subject to individual environmental review and approval. The 2030 General Plan EIR found that all project impacts are considered less than significant with implementation of policies and implementation programs identified in the 2030 General Plan EIR. The City and other jurisdictions would continue to evaluate the levels of service needed and the funding sources available to meet increases in demand. Further, local planning to accommodate future growth will reduce cumulative impacts associated with the provision of services to a less than significant level. The City will continue to implement solid waste reduction programs and expand existing recycling programs to include construction debris. The City and other jurisdictions will continue to maximize the use of existing recycling and disposal options and plan for future water diversion, recycling, and disposal. The 2030 General Plan EIR found that impact from utilities is cumulatively less than significant.

As detailed above, the proposed Sub-Neighborhood Plan would be adequately supplied by all utilities. As a result, there would be less than significant cumulative impacts with implementation of the proposed Sub-Neighborhood Plan.

4.18.7 Level of Significance Before Mitigation

Impacts would be less than significant without mitigation.

4.18.8 Mitigation Measures

No mitigation measures are required.

4.18.9 Level Of Significance After Mitigation

No mitigation is required. Impacts would remain less than significant.

5.0 OTHER CEQA CONSIDERATIONS

5.1 GROWTH INDUCING IMPACTS

5.1.1 Introduction

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines, as amended, requires an EIR to include a discussion of the ways in which a project could directly or indirectly foster economic growth, population growth, or the construction of additional housing in the surrounding environment that may result in impacts on the environment. This discussion should address projects that would remove obstacles to population growth and consider any characteristics of a project which may encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively. Section 15126.2(e) of the *CEQA Guidelines* emphasizes that growth in an area should not be considered beneficial, detrimental, or of little significance. This section discusses the potential for the proposed Project to induce additional growth in accordance with this section of the *CEQA Guidelines*.

In general terms, a project may foster spatial, economic, or population growth in a geographic area if it results in the following:

- Remove an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).
- Create economic expansion or growth (e.g., construction of additional housing, changes in revenue base, employment expansion, etc.)
- Involve a precedent-setting action (e.g., an innovation, a change in zoning or general plan designation).
- Develop or encroach into an isolated, or adjacent, undeveloped, or open space expansion.

5.1.1.1 Remove an Impediment to Growth

Growth in an area may occur when physical barriers (such as lack of infrastructure or access) or planning barriers (such as restrictive zoning or land use designations) are removed. Physical impediments generally include the absence of adequate roadways, water supply, wastewater conveyance, or other essential public services. Planning impediments may include General Plan or zoning designations that do not permit development or limit the types or intensities of land uses that may occur.

As discussed in **Section 4.14: Population and Housing**, the proposed Project is estimated to increase the population of the City by approximately 2,064 people. The City is estimated to have a population of approximately 228,600 people in 2050, an approximate increase of 29,867 people from the 2025 population of 198,733. The proposed Project would represent 6.9% of this expected population growth between 2025 and 2050 in the City. Although the proposed Project would result

in a higher population generation compared to the Project Site's General Plan land use designation, the population growth associated with the Project would still be a fraction of the City's planned population growth under Southern California Association of Governments' (SCAG's) Connect SoCal population forecasts.

The Project Site is located within an already urbanized portion of the City of Oxnard served by existing infrastructure and surrounded by existing residential neighborhoods, Del Sol High School, and commercial uses. The Project Site is within the City's Urban Restriction Boundary (CURB) and is designated for development by the Oxnard General Plan and the Northeast Community Specific Plan (NECSP). Water, wastewater, storm drain, roadways, and public services already extend to and around the Project Site, and the proposed Sub-Neighborhood Plan would connect to these existing systems.

Gold Coast Transit District (GCTD) bus routes 2 (Colonia-Downtown Oxnard) and 4 (North Oxnard) serve the Project Site. Several GCTD bus stops were previously added along Rose Avenue under Agreement No. A-8333 between the City of Oxnard and the GCTD within the vicinity of the proposed Sub-Neighborhood Plan.

As discussed in **Section 4.10: Hydrology and Water Quality** of this Draft EIR, the Project Site is subject to the Rice Road Drain watershed flow limit of 1 cubic feet per second (cfs) per acre, and the proposed Project would construct only localized on-site improvements (e.g., internal streets, storm drain lines, and utility connections) necessary to support the residential and commercial uses that would be allowed by the proposed Sub-Neighborhood Plan. These improvements would not extend infrastructure into undeveloped areas nor facilitate new development beyond the Project Site.

The proposed General Plan Amendment and Zone Change would change the land use designations for the Project Site from Residential Low Medium (RLM), Park (PRK), and Community Reserve (C-R) to Residential High (RH), General Commercial (CG), and the zoning to Specific Plan consistent with the Oxnard General Plan and NECSP. These changes do not remove a planning impediment to growth; rather, they implement the planned land uses envisioned for this portion of the NECSP and do not open new areas for additional development outside the Project Site.

Because the Project Site is already served by municipal services, including water and wastewater services by the City, electrical service by Southern California Edison, natural gas and existing streets bordering and crossing the site, including Rose Avenue, Camino del Sol, Cesar Chavez Drive, and Jacinto Drive, development of the Sub-Neighborhood Plan would not require major expansion or extension of infrastructure that would remove an obstacle to growth in surrounding areas. Improvements constructed as part of the proposed Project would be limited to facilities required to serve the uses that would be allowed by the Sub-Neighborhood Plan and would not induce growth beyond that associated with the Project.

Therefore, the proposed Sub-Neighborhood Plan would not remove a physical or planning impediment to growth or facilitate additional development beyond what is already allowed under the NECSP and the City's long-range planning framework.

5.1.1.2 Economic Growth

The second criterion for considering potential for a project to induce growth is economic considerations. The proposed Sub-Neighborhood Plan would regulate the development of up to 950 residential dwelling units, a maximum of 40,000 square feet of retail and general commercial space, parks, streets, and pedestrian facilities within the approximately 107-acre Project Site within the City of Oxnard.

The City is estimated to have a population of approximately 228,600 people in 2050,[1] an approximate increase of 29,867 people from the 2025 population of 198,733. The proposed Project would represent 6.9% of this expected population growth between 2025 and 2050 in the City. It is expected that the employment from 2019 to 2050 will increase by approximately 9,800 employees.[2]

In the short term, the proposed Project would generate temporary construction employment opportunities. It is expected that the majority of the temporary construction jobs that would be created by implementation of the proposed Sub-Neighborhood Plan would be filled by local construction workers. For this reason, the temporary construction jobs created by the proposed Project are not likely to result in a direct population growth in the City.

The proposed Project would include up to 40,000 square feet of neighborhood serving commercial space. According to the SCAG Employee Density Study, there would be one employee for every 412 square feet of commercial space.[3] Therefore, it is estimated that the proposed Project would generate a maximum of 98 employees. The proposed Project would generate approximately one percent of the expected increase in employment in the City. The employment growth associated with the Project would be consistent with planned employment growth in the City and would be consistent with SCAG employment projections.

As discussed in **Section 4.15: Public Services and Recreation**, the proposed Project is subject to development fees that could be used to fund public services or facilities in the future, including but not limited to police, fire, library, and park facilities. However, funded projects would be subject to future CEQA review.

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1 Southern California Association of Governments (SCAG). *SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Maulhardt-Stiles Sub-Neighborhood Plan Project* [SCAG NO. IGR11182]. March 2025. **Appendix B**.

2 SCAG. *Employee Density Study*. 2001. Accessed February 2026. https://www.mwcog.org/file.aspx?A=QTTlTR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D

3 SCAG. *Employee Density Study*.

5.1.1.3 Precedent-Setting Action

A proposed Project may also induce additional growth, if it involves the approval of a precedent setting action, such as a general plan amendment or zone change that could have implications for other properties, or that could make it easier for other properties to develop.

The proposed Project involves the adoption of a Sub-Neighborhood Plan and related General Plan Amendment, zone change, and Tentative Tract Map approval applicable only to the approximately 107-acre Project Site within the NECSP Area in the City of Oxnard. Since 2012, the Project Site has been identified in City planning documents as an appropriate location for urban village development and infill growth, and its future development has been evaluated in multiple previously certified programs and project-level EIRs, including the NECSP EIR, the City of Oxnard 2030 General Plan EIR, the East Village Phase III Annexation EIR, and the Del Sol High School EIR.

The proposed Project implements General Plan policies encouraging walkable, mixed-use urban villages by establishing a form-based Sub-Neighborhood Plan that regulates future development through site-specific development standards, regulating zones, and overlay zones. These regulatory tools apply specifically to the Project Site and guide development consistently with the City's long-range planning framework, rather than introducing new development that would be applied elsewhere in the City of Oxnard. The proposed Project does not propose amendments that will change Citywide land use policies or zoning standards beyond the Project Site boundaries.

While the proposed Project will allow for up to 950 residential dwelling units and up to 40,000 square feet of neighborhood-serving commercial uses, the proposed development will be consistent with the General Plan land use designation of the Project Site as an urban village opportunity area and with the growth assumptions previously analyzed. The proposed Project will not establish new land use entitlements that could be readily replicated on surrounding uses, nor will it reduce development constraints or approval requirements for other sites outside of the Project Site.

For these reasons, approval of the proposed Project will not represent precedent setting actions that will induce additional growth beyond that already anticipated and planned for under the City of Oxnard General Plan and the NECSP.

5.1.1.4 Develop or Encroach into Undeveloped or Open Space Areas

As discussed above, the proposed Project would involve the development within an area that has long been planned for urban use under the City's General Plan and the NECSP. While portions of the approximately 107-acre Project Site are currently undeveloped or previously disturbed, the Project Site is located within City limits and has been evaluated for future urban development through multiple previously certified environmental review documents.

The Project Site includes existing development, including Del Sol High School, the Maulhardt residence and associated buildings relate to previous agricultural operations, and previously disturbed areas consisting of fallowed agricultural land. Development of the proposed Project would implement adopted planning policies by guiding future growth in a comprehensive, master-planned manner consistent with the City's long-range planning framework. Furthermore, the proposed Project would provide approximately 12.9 acres of parks and open space as part of the overall site design.

As such, the proposed Project would not encroach into undeveloped or open space areas beyond those already planned for urban development. For these reasons, the Project would not induce growth through development of undeveloped or open space areas.

5.1.2 Conclusion

The proposed Project would not result in the removal of an impediment to growth, nor involve the approval of precedent setting actions that could result in additional growth in the Project area. The employment and population growth associated with the proposed Project would be consistent with SCAG growth forecasts for the City of Oxnard. In addition, the proposed Project would neither cause growth (i.e., new employment) nor accelerate development in an undeveloped area that would exceed projected/planned levels, as the proposed Project would be consistent with the adopted employment housing and population growth forecasts in the SCAG 2024-2050 Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) and the City's 2030 General Plan. Therefore, the proposed employment opportunities associated with the proposed commercial uses are not considered growth-inducing. For these reasons, the potential for the Project to induce additional growth is considered low and the potential for additional environmental impacts to result from additional growth is considered less than significant.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines states that use of nonrenewable resources during the initial and continued phases of a project may be irreversible since a large commitment of such resources make their removal or non-use thereafter unlikely. This section evaluates whether the proposed Project would result in the irretrievable commitment of resources or would cause irreversible changes in the environment. Also, in accordance with Section 15126.2(d) of the CEQA Guidelines, this section identifies any irreversible damage that could result from environmental accidents associated with the proposed Project.

5.2.1 Irreversible Commitment of Resources

Implementation of the proposed Project would involve the development of residential, commercial, park, and infrastructure improvements on the approximately 107-acre Project Site. Construction and operation of the proposed Project would result in the incremental consumption of renewable and nonrenewable resources, including water, energy, fuel, construction materials, and labor.

Resources, such as lumber and other forest products, are generally considered renewable resources. Such resources would be replenished over the lifetime of the Project. For example, lumber supplies are increased as seedlings mature into trees. As such, the development of the Project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources over the life of the Project.

Non-renewable resources, such as natural gas, petroleum products, asphalt, petrochemical construction materials, steel, copper, other metals, and sand and gravel are considered to be commodities that are available in a finite supply. The processes that created these resources occur over a long period of time. Therefore, the replacement of these resources would not occur over the life of the Project. To varying degrees, these materials are all readily available and some materials, such as asphalt, sand, or gravel, are abundant. Other commodities, such as metals, natural gas, and petroleum products, are also readily available, but they are finite in supply given the length of time required by the natural process to create them.

To ensure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (California Public Resources Code Section 21100[b][3]). Consistent with both California Public Resources Code Section 21100(b)(3) and a ruling set forth by the court in California Clean Energy Committee v. City of Woodland, potentially significant energy implications of a project must be considered in an EIR to the extent relevant and applicable to the project.

Accordingly, based on the energy consumption thresholds set forth in Appendices F and G of the CEQA Guidelines, the project's estimated energy demands were evaluated in **Section 4.6: Energy** of this Draft EIR. The overall purpose of the energy analysis was to evaluate whether the project would result in the wasteful, inefficient, or unnecessary consumption of energy.

As further assessed in the energy analysis in **Section 4.6: Energy** of this Draft EIR, for new development such as that proposed by the project, compliance with California Code of Regulations Title 24 energy efficiency requirements is considered demonstrable evidence of efficient use of energy.

Utility services, including water, wastewater, and electricity, would be provided by existing City infrastructure systems, with new on-site and local connections constructed as part of the proposed Project. The proposed Project's demand for these resources would represent a small increment of overall City and regional consumption and would not result in the wasteful, inefficient, or unnecessary use of nonrenewable resources.

The demand for construction materials, energy, and other resources is expected to increase regardless of whether or not the proposed Project is implemented. An increase in population within the State would directly result in the need for more retail, commercial, and residential facilities, in

order to support this growth. The demand for construction materials, energy, and other resources associated with the proposed Project reflects development that has been planned and anticipated under the City's General Plan and the NECSP. The Project Site is designated for urban village development and residential and commercial uses under these adopted planning documents. As such, the consumption of construction materials, energy, and other resources associated with development of the Project Site has been accounted for in the City's long-range planning framework and growth projections. Implementation of the proposed Project would therefore represent the use of resources consistent with the level of development planned for the site rather than the introduction of new or unforeseen resource demands. Furthermore, the investment of resources in the proposed Project would be typical of the level of investment normally required for a mixed-use project of this scale.

5.2.2 Irreversible Environmental Changes

Irreversible, long-term environmental changes associated with the proposed Project would include a change in the visual character of the Project Site resulting from the development of new residential neighborhoods, neighborhood-serving commercial uses, parks, and associated infrastructure within the approximately 107-acre site. Additional irreversible environmental changes would include the conversion of agricultural land to urban uses, increases in local and regional vehicular traffic, and the associated increases in air quality, greenhouse gas, and noise emissions generated by construction and long-term operation of the proposed Project.

The proposed Project would comply with applicable Federal, State, and local regulations intended to minimize environmental effects associated with urban development. While the proposed Project would result in short-term construction related noise and air quality emissions and long-term operational emissions from increased vehicle trips, these effects represent typical and unavoidable changes associated with urban development and as analyzed in this EIR, none of these impacts are significant.

5.2.3 Potential Environmental Damage from Accidents

The proposed Project does not include any uniquely hazardous uses, and its operation would not be expected to result in environmental damage from accidents that could affect the surrounding areas. As discussed in **Section 4.7: Geology and** Soils, the Project Site is located within a seismically active region and would be subject to ground shaking during a seismic event. Development of the proposed Project would be required to comply with applicable Federal, State, and local regulations, including the California Building Code, and City of Oxnard construction standards, which are intended to minimize the potential for damage or injury in the event of an accident or natural disaster. Construction activities would be subject to standard safety and hazardous materials handling requirements. With compliance with these regulatory requirements, the potential for environmental damage resulting from accidents associated with the proposed Project would be less than significant.

5.2.4 Conclusion

Construction and operation of the proposed Project would contribute to the incremental depletion of resources, including renewable and non-renewable resources; however, the demand for all such resources is expected to increase regardless of whether or not the proposed Project is developed. The Project Site was planned to be developed with mixed-use community under the City's General Plan and NECSP. The proposed Project would comply with applicable energy conservation standards.

Additionally, the proposed Project would not cause significant irreversible, long-term environmental changes as the proposed Project will comply with regulatory requirements that would minimize the effects of the environmental changes associated with the development. The proposed Project would not include uniquely hazardous uses and would comply with applicable construction and safety standards designed to reduce the potential for environmental damage from accidents. For these reasons, the potential for the proposed Project to result in significant irreversible environmental changes or environmental damage from accidents is considered less than significant.

5.3 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Section 15126.2(b) of the State CEQA Guidelines requires an Environmental Impact Report (EIR) to identify any significant environmental effects of a project that cannot be avoided or reduced to a less than significant level through implementation of feasible mitigation measures. As described in Section 4.0, Environmental Impact Analysis, of this Draft EIR, implementation of the proposed Project would result in several environmental impacts that would remain significant and unavoidable, even with incorporation of mitigation measures and compliance with applicable regulatory requirements.

Specifically, the proposed Project would result in significant and unavoidable impacts related to Agricultural Resources, Air Quality, and Cultural Resources (Historic Resources). Mitigation measures have been identified to reduce the magnitude of these impacts where feasible; however, these measures would not fully offset the environmental effects associated with the conversion of Prime Farmland, regional criteria pollutant emissions that exceed applicable significance thresholds, or the demolition of historic resources located on the Project Site. As a result, these impacts would remain significant and unavoidable.

The mitigation measures associated with these impacts are summarized in **Section 1.0: Executive Summary** and are described in detail in the relevant resource sections of Section 4.0. The following subsections provide additional discussion of each significant and unavoidable impact associated with implementation of the proposed Project.

5.3.1 Agricultural Resources

As discussed in **Section 4.2: Agricultural Resources**, portions of the Project Site are designated important farmland - Prime Farmland and Farmland of Statewide Importance. The development of the proposed Project would convert important farmland to urban uses, resulting in significant agricultural resource impacts. Mitigation for agricultural impacts was evaluated based on measures previously adopted for development of the Project Site. **MM AG-1**, derived from the East Village Phase III Annexation EIR, would require the removal of the top 12 inches of topsoil be transported to farm sites that have lower soil quality. **MM AG-1** would partially reduce impacts associated with the conversion of important farmland but would still result in significant and unavoidable impacts.

5.3.2 Air Quality

As discussed in **Section 4.3: Air Quality**, operation of the proposed Project would generate criteria air pollutant emissions that exceed Ventura County Air Pollution Control District (VCAPCD) thresholds. There are no feasible mitigation measures for the operation of the proposed Project. Therefore, air quality impacts remain significant and unavoidable.

5.3.3 Cultural (Historic) Resources

As discussed in **Section 4.5: Cultural Resources**, Area C contains several eligible historic resources including the Maulhardt residence, barn, and garage. Development of the proposed Project would require the demolition of these buildings and features, resulting in significant cultural resource impacts. The proposed Project would incorporate **MM CUL-1**, which would require documentation and photo-documentation of historic resources under Historic American Buildings Survey (HABS)/ Historic American Engineering Record (HAER) standards. **MM CUL-1** would partially reduce impacts but would still result in significant and unavoidable impacts.

6.0 ALTERNATIVES

6.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS FOR ALTERNATIVE ANALYSIS

This section of the Draft Environmental Impact Report (DEIR) provides a comparative analysis of the environmental effects of alternatives to the proposed Project. The analysis is prepared in accordance with the CEQA Guidelines, which requires that an EIR describe a reasonable range of alternatives to the project, or to its location, that would feasibly attain most of the basic objectives of a proposed project while avoiding or substantially lessening any of its significant environmental effects to foster meaningful public participation and informed decision-making. The comparative analysis of alternatives is required to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project.

When assessing feasibility, CEQA allows consideration of factors such as site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory constraints, jurisdictional boundaries, and whether the applicant could reasonably acquire or access an alternative site. Each alternative in this section is evaluated in comparison to a proposed project to determine whether its overall environmental impacts would be less, similar, or greater.

6.2 PROJECT OBJECTIVES

The State CEQA Guidelines requires an EIR to include a statement of objectives that addresses the underlying purpose of the proposed Project. As described in **Section 2.0: Project Description**, the proposed Project is a Sub-Neighborhood Plan that would guide the future development of the Project Site with uses consistent with the City of Oxnard (City) 2030 General Plan and Northeast Community Specific Plan (NECSP), allowing up to 950 residential units, 40,000 square-feet of commercial uses and associated parks and open space. The objectives of the proposed Project include the following:

1. Implement General Plan Policy CD-7.1 by developing a walkable, infill 'urban village' at the Project Site, complete with a mixture of housing typologies, land uses, and multiple transportation/circulation options.
2. Provide neighborhood-serving commercial uses to meet the daily needs of residents, reduce reliance on automobile travel, and generate additional retail sales tax revenue for the City.
3. Enhance existing parks and create new park spaces by providing approximately 12.90 acres of new parks and open space, including an approximate 5.3-acre expansion of the existing East Village Park.
4. Maximize residential development potential of the site within the parameters of the available water allocation for the site, the NECSP, and the General Plan, in order to provide much needed housing for all income segments.

5. Provide ample opportunities for low income and workforce housing by ensuring 15% of housing stock provided by the Project is affordable based on sale developments and rent/leased developments:
    a. For sale developments:
        i. Minimum 15% Low Income (or more affordable level)
    b. For rent/leased developments:
        i. Minimum 5% Very Low Income (or more affordable level)
        ii. Minimum 10% Low Income (or more affordable level)
6. Create a neighborhood in alignment with the City's "Vision for a More Livable Community" by providing a broad range of housing typologies, an array of greens and park spaces, human scaled streetscapes, active building frontages that are oriented towards the street via utilization of porches, storefronts, and dooryards, and robust pedestrian and bicycle infrastructure.
7. Ensure that structures and the broader built environment within the community are of high quality, are aesthetically pleasing, and in alignment with the community's vision by developing and enforcing stringent architectural and building design standards.

6.3 SUMMARY OF PROJECT IMPACTS

In accordance with Section 15126.6(b) of the CEQA Guidelines, alternatives to the proposed Sub-Neighborhood Plan were identified to provide additional information on ways to avoid or substantially lessen the significant impacts of the proposed Sub-Neighborhood Plan as identified and described in **Section 4.0: Environmental Impact Analysis** of this DEIR.

Table 6.0-1: Environmental Impact Summary presents a summary of the findings for each topic analyzed in this EIR for the proposed Sub-Neighborhood Plan. As shown, the Project would result in significant impacts related to agricultural resources, air quality, and cultural (historic) resources. Portions of the Project Site are designated important farmland. The proposed Project would convert designated farmland to urban use, resulting in significant and unavoidable agricultural resource impacts. Operation of proposed Project would exceed the Ventura County Air Pollution Control District (VCAPCD) operational emissions, resulting in significant and unavoidable air quality impacts. The Project Site contains eligible historic resources in Area C, including the Maulhardt main residence, garage/living quarters, and the barn. Development of the proposed Project would require the demolition of these eligible historic resources, resulting in significant and unavoidable impacts. The proposed Project would have potentially significant impacts to air quality (construction emissions), biological resources, cultural (archaeological) resources, geology and soils, noise, transportation, and tribal cultural resources; however, with implementation of mitigation measures, these potentially significant impacts would be reduced to less than significant.

TABLE 6.0-1: ENVIRONMENTAL IMPACT SUMMARY				
Topic	Potentially Significant Impact?		Mitigated to less than Significant?	Unavoidable Significant Impact?
	Construction	Operation		
Aesthetics and Urban Design	No	No	N/A	N/A
Agricultural Resources	Yes	No	No	**Yes**
Air Quality	Yes	Yes	No	**Yes**
Biological Resources	Yes	No	Yes	No
Cultural Resources	Yes	No	No	**Yes**
Energy	No	No	N/A	N/A
Geology and Soils	Yes	No	Yes	No
Greenhouse Gas Emissions	No	No	N/A	N/A
Hazards and Hazardous Materials	No	No	N/A	N/A
Hydrology and Water Quality	No	No	N/A	N/A
Land Use and Planning	No	No	N/A	N/A
Mineral Resources	No	No	N/A	N/A
Noise	Yes	No	Yes	No
Population and Housing	No	No	N/A	N/A
Public Services and Recreation	No	No	N/A	N/A
Transportation	Yes	No	Yes	No
Tribal Cultural Resources	Yes	No	Yes	No
Utilities and Service Systems	No	No	N/A	N/A

6.4 ALTERNATIVES CONSIDERED

Section 15126.6(c) of the CEQA Guidelines states that an EIR should briefly describe the rationale for selecting the alternatives to be discussed and the reasons for eliminating alternatives from detailed consideration in an EIR. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic Project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. One alternative to the proposed Sub-Neighborhood Plan was initially considered but was determined to be infeasible for the reasons discussed below and are not evaluated in detail.

6.4.1 Alternative Site Considered but Not Evaluated

An alternative site would involve the development of the proposed Project at a different location. Given that the Project Applicant neither owns nor controls any other property in the vicinity of the Project Site, the ability of the Project Applicant to find and purchase an alternative site on which to develop the Project is considered speculative. In addition, the development of an alternative site would not ensure that all or most of the project objectives would be met as the proposed Project

implements the City's NECSP. Additionally, the selection of an alternative site would not necessarily avoid the potential impacts during construction identified for the proposed Project. As indicated in CEQA 15126.6(c), "among factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. Relocation of the Project to an alternative site would not be feasible because identifying and acquiring a site of sufficient size to accommodate the Project would be speculative and difficult due to the developed nature and existing General Plan and zoning regulations for other undeveloped land in the City. Additionally, development at an alternative location may not avoid or substantially reduce the Project's significant impacts. For these reasons, an alternative site is not evaluated in detail.

6.4.2 Alternatives Evaluated

As discussed above, the proposed Sub-Neighborhood Plan would result in impacts to agricultural resources, air quality, and cultural resources following implementation of the mitigation measures identified in this EIR. All other potential significant impacts would be mitigated to less than significant by implementation of the mitigation measures identified in this EIR.

The City identified a range of alternatives for analysis in this EIR to evaluate whether each could avoid or substantially lessen the significant environmental impacts of the proposed Project while also meeting the Project's basic objectives. Section 15126.6(e)(1) requires the specific alternative of "No Project" to be evaluated. Section 15126.6(e)(3)(b) states that if a project is a development project on identifiable property, the No Project alternative is the circumstance under which the project does not proceed.

In addition to the No Project/No Development Alternative (Alternative 1), two development alternatives were identified for evaluation. Because the proposed Project requires a General Plan Amendment and Zone Change, Alternative 2 (Existing Land Use Designations/Zoning) examines development of the Project Site as allowed by the General Plan land use designation and zoning. This alternative would allow less residential development and more commercial development than the proposed Sub-Neighborhood Plan. This alternative is evaluated to determine if any of the significant impacts of the Project as proposed would be avoided or substantially lessened. Alternative 3 (Area A Development) would include the development proposed within Area A by the proposed Sub-Neighborhood Plan, but not development of Area C, which contains historic resources that would be impacted by implementation of the proposed Project.

Table 6.0-2: Comparison of Proposed Project Alternatives Buildout Characteristics provides a comparison of the development characteristics of the proposed Project and the alternatives. The characteristics and environmental effects of each alternative are described in the following sections.

TABLE 6.0-2: COMPARISON OF PROPOSED PROJECT ALTERNATIVES BUILDOUT CHARACTERISTICS				
Characteristics	Proposed Project	Alternative 1: No Project / No Development	Alternative 2: Existing Land Use Designations/ Zoning	Alternative 3: Phase I Only
Residential (dwelling units)	950	0	126	656
Commercial (square feet)	40,000	0	60,000	37,000
Parks and Open Space (acres)	11.27	0	34	10.27

6.5 ALTERNATIVE 1 – NO PROJECT/NO DEVELOPMENT ALTERNATIVE

6.5.1 Alternative Description

Consideration of the No Project/No Development Alternative is required by Section 15126(2)(4) of the CEQA Guidelines. As required by the CEQA Guidelines, the analysis evaluates the impacts associated with leaving the site in its present condition.

Under Alternative 1, Area A would continue to be undeveloped land, Del Sol High School would remain in Area B, and Area C would continue to be undeveloped land containing buildings and associated with the past use of the entire site for agricultural purposes, including the main Maulhardt family residence, garage/living quarters, cottage, carriage house, shed, barn, farm equipment building, paddocks/stalls, outbuilding #1, outbuilding #2, modular building #1, modular building #2, carport, gate piers, and swimming pool.

6.5.2 Comparative Impact Evaluation

Alternative 1 would involve no changes to the physical environment and thus would have no environmental effects. As such, Alternative 1 would have no impact with respect to aesthetics and urban design, agricultural resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services and recreation, transportation, tribal cultural resources, and utilities and service systems.

Although Alternative 1 would not necessarily conflict with land use and planning policies with the existing setting of the Project Site, Alternative 1 would not implement key General Plan goals and policies. The Project Site is designated under the City's General Plan as the East Village Phase III urban village. The City's General Plan defines urban villages as mixed use areas designed to encourage persons to live near their place of employment and/or support services. The integration of complementary land uses is intended to promote a pedestrian orientation to reduce trips and vehicle miles traveled and reduce GHGs. Alternative 1 would not create a mixed-use area nor would the

undeveloped and disturbed nature of the Project Site complement the developed nature of the surrounding area. Additionally, Alternative 1 would not assist in the City's goal for more affordable housing to reach its Regional Housing Needs Assessment (RHNA) target production.

6.5.3 Summary of Comparative Impacts

A summary comparison of impacts associated with the Project Alternatives is provided in **Table 6.0-31: Comparison of Alternatives to Project**. As described above, the No Project/No Development Alternative would avoid all environmental impacts identified for the proposed Project.

6.5.4 Relationship to Project Objectives

Under the No Project Alternative, the proposed Sub-Neighborhood Plan would not be adopted and no development would occur on the Project Site. As a result, this alternative would not implement General Plan Policy CD-7.1 or advance the City's goal of developing a walkable, mixed-use urban village with diverse housing types, land uses, and multimodal transportation options (Objective 1). The No Project Alternative would not provide neighborhood-serving commercial uses to meet daily needs, reduce vehicle trips, or generate retail sales tax revenue (Objective 2), nor would it enhance existing parks or create new park and open space amenities, including expansion of East Village Park (Objective 3).

In addition, this alternative would not maximize the residential development potential of the site within the parameters of the available water allocation, the NECSP, and the General Plan, and therefore would not contribute to meeting the City's housing needs (Objective 4). The No Project Alternative would also fail to provide affordable and workforce housing consistent with the Project's affordability commitments (Objective 5). Because no development would occur, this alternative would not implement the City's vision for a livable community with human-scaled streetscapes, active frontages, and robust pedestrian and bicycle infrastructure (Objective 6), nor would it ensure high-quality architectural and site design consistent with the City's community character and design standards (Objective 7).

Accordingly, while the No Project Alternative would avoid the environmental impacts identified for the proposed Project, it would fail to meet most of the basic objectives of the Project. As a result, under the No Project Alternative, the City or future applicants would need to pursue other projects to achieve these overarching objectives, which would require separate environmental review under CEQA.

6.6 ALTERNATIVE 2 – EXISTING LAND USE DESIGNATIONS/ZONING

6.6.1 Alternative Description

Alternative 2 evaluates the environmental impacts that would result from development consistent with the current General Plan land use designations and zoning for the Project Site. The Project Site is designated Residential Low Medium (RLM), General Commercial (CG), and Park (PRK), and is zoned Multiple-Family Residential Planned Development (R-2-PD), General Commercial Planned Development (C-2-PD), and Community Reserve (C-R). An Urban Village Overlay applies to the Project Site.[1] The RLM land use designation allows 7 to 12 units per acre, allowing low-rise apartments and detached and attached single-family residences, with live/work uses prohibited. The CG land use designation has a floor area ratio (FAR) of 0.35:1, and allows retail centers, free-standing commercial uses along arterials, and may include office, residential uses up to 18 dwelling units per acre, live/work, work/live, mixed uses. The PRK land use designation allows City, County, State, and national-owned parks, beaches, regional parks, community parks, neighborhood parks, special purpose facilities, golf courses, athletic fields, and open space areas.[2]

As shown in **Figure 6.0-1: Alternative 2 Land Use Plan**, the existing land use designations and zoning would allow development of up to 126 residential units, 60,000 square-feet of commercial space, and include 34 acres of park and open space. Additionally, Alternative 2 would include ancillary improvements including interior roads, sidewalks, and a multi-use path between the two RLM neighborhoods in Area A. The CG land use designation for Area C allows both commercial and residential uses. Area B is developed with the Del Sol High School and no further development would occur in Area B.

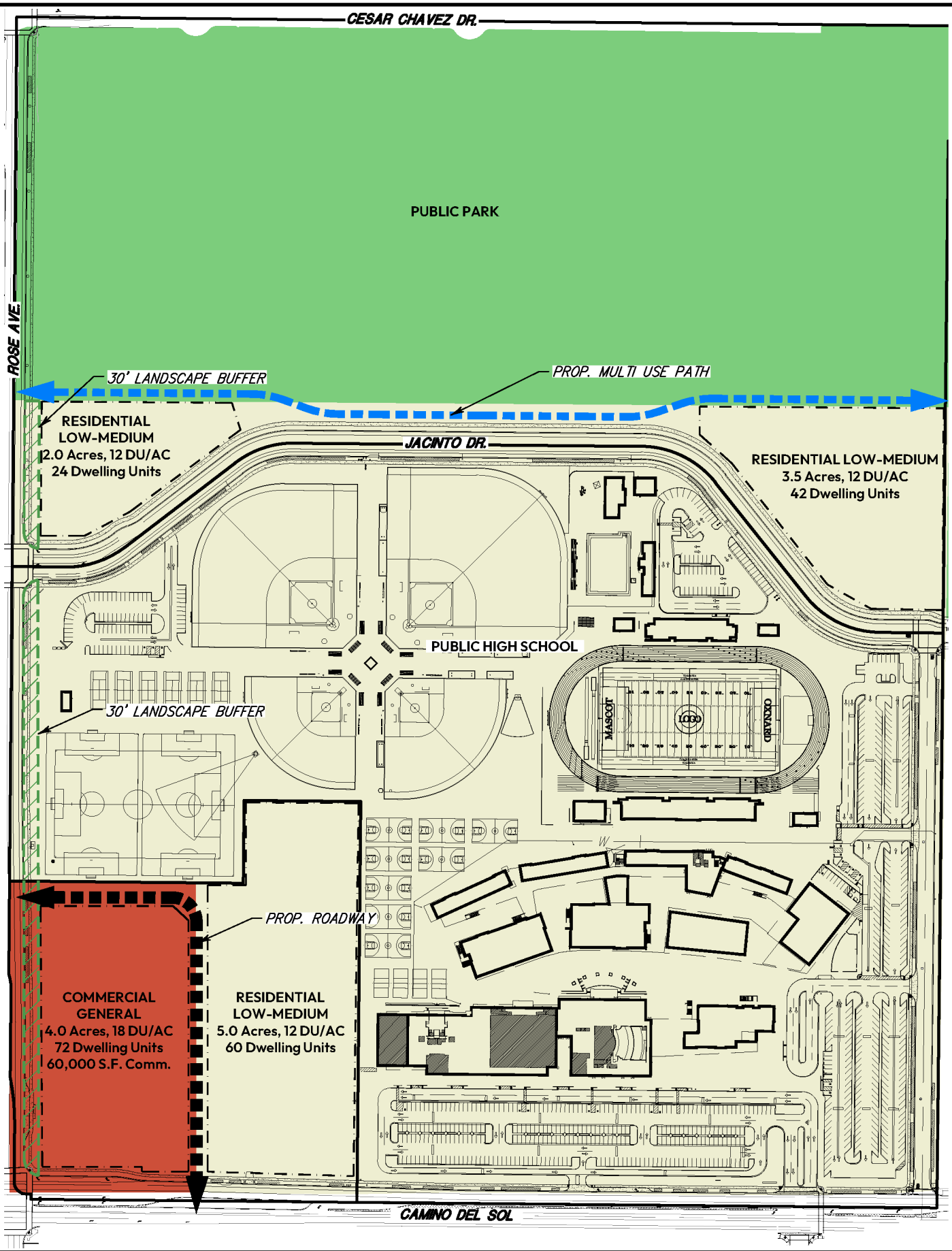
Table 6.0-3: Comparison of the Proposed Project to Alternative 2 provides a development comparison between the proposed Project and Alternative 2. The comparison results in a reduction of 824 residential dwelling units, an addition of 20,000 square feet of commercial space, and an addition of 22 acres of parks and open space compared to the proposed Project.

TABLE 6.0-3: COMPARISON OF THE PROPOSED PROJECT TO ALTERNATIVE 2

Characteristics	Proposed Project	Alternative 2: Existing Land Use Designations/ Zoning	Development Comparison
Residential (dwelling units)	950	126	-824
Commercial (square feet)	40,000	60,000	+20,000
Parks and Open Space (acres)	11.27	34	+22.73

1 City of Oxnard. *2030 General Plan, Goals and Policies*. Adopted October 2011. Accessed February 2026. https://www.oxnard.gov/wp-content/uploads/Oxnard-2030-General-Plan-Amend-12.2022-SMda.pdf.

2 City of Oxnard. *2030 General Plan*.



SOURCE: Sanborn - 2025.

FIGURE **6.0-1**

Meridian Consultants

Alternative 2 Land Use Plan

408-001-24

6.6.2 Comparative Impact Evaluation

Aesthetics and Urban Design

The City's 2030 General Plan identifies beaches, coastlines, waterways, agricultural greenbelts, view corridors, and urban landscapes with historic park or plaza features as key scenic resources. Scenic views from the Project Site are limited to partially obstructed views of the distant Coastal Mountain Range. Due to the Project Site's urban setting, distance from the coast, and intervening development, there are no views of coastlines, waterways, or agricultural greenbelts from the site.

The existing R-2-PD and C-R zoning allow a maximum building height of two stories (25 feet), and the C-2-PD zoning district allows a maximum building height of three stories (35 feet). In comparison, the proposed Project would allow buildings of up to two to four stories. As a result, Alternative 2 would include development of a smaller scale and reduced vertical massing compared to the proposed Project, thereby reducing the potential to obstruct scenic views or affect scenic resources.

Alternative 2 would include substantially less residential development (126 dwelling units) and substantially more park and open space (approximately 34 acres) than the proposed Project. The reduced intensity of development and increased open space would further limit overall building massing and reduce the potential for view obstruction along identified view corridors, including the Rose Avenue scenic corridor. With lower maximum building heights, reduced building bulk, and a greater proportion of the Project Site retained as open space, Alternative 2 would reduce the degree to which new structures could impede public views compared to the proposed Project. Given the already constrained visibility of scenic resources in the area, Alternative 2 would not result in significant impacts to scenic vistas or scenic resources.

The Project Site is located in an urbanized portion of the City; therefore, the analysis focuses on whether Alternative 2 would conflict with applicable regulations governing scenic quality rather than whether it would affect undeveloped scenic landscapes. Alternative 2 would be developed in accordance with the existing General Plan land use designations and zoning regulations. For this reason, development under Alternative 2 would not conflict with applicable regulations or policies governing scenic quality.

The Project Site is not located on or near any State-designated scenic highways. The City and County have identified a portion of Rose Avenue between Route 101 and Route 1 as a scenic route, as it serves as an image corridor characterized by expansive northerly views of distant mountain ranges. However, as described above, Alternative 2 would result in reduced residential intensity, lower maximum building heights, and greater park and open space compared to the proposed Project, which would reduce overall building massing and potential obstruction of views along the Rose Avenue corridor. Therefore, Alternative 2 would result in less than significant impacts to scenic highways or scenic corridors.

Alternative 2 would introduce new development on the Project Site; however, compared to the proposed Project, it would do so at a substantially lower residential intensity and with significantly more open space. Development under Alternative 2 would be consistent with existing zoning expectations for building height and scale, and the inclusion of a multi-use path within the narrow corridor separating the two RLM neighborhoods in Area A would preserve that area as open and landscaped space rather than developed residential lots. Collectively, these factors would reduce changes to the Project Site's visual character and reduce perceived building bulk and massing compared to the proposed Project's higher-intensity development scenario.

Overall, Alternative 2 would incrementally reduce aesthetic and urban design impacts compared to the proposed Project by reducing maximum building heights, overall development intensity, and building massing, and by increasing park and open space. However, Alternative 2 would still introduce urban development consistent with the site's planned urban context. Therefore, impacts related to aesthetics and urban design under Alternative 2 would be similar to or slightly less than those associated with the proposed Project, and impacts would remain less than significant.

Agricultural Resources

As shown in **Figure 4.2-1: Important Farmland Categories**, portions of the Project Site are designated as Prime Farmland and Farmland of Statewide Importance. In comparison to the proposed Project, Alternative 2 would not reduce the amount of farmland converted, as both alternatives include development within Areas A and C. Accordingly, Alternative 2 would not reduce the severity of impacts related to the loss of Prime Farmland. Implementation of **MM AG-1**, which requires either salvaging and relocating the upper 12 inches of topsoil for reuse on lower-quality agricultural lands with protection through an agricultural conservation easement, or payment of agricultural conversion in-lieu fees, would reduce the severity of impacts associated with Alternative 2, but would not avoid the permanent conversion of farmland. Therefore, impacts to agricultural resources under Alternative 2 would remain significant and unavoidable.

Overall, Alternative 2 would result in similar agricultural resource impacts when compared to the proposed Project, as both would convert farmland to urban uses. Thus, under both Alternative 2 and the proposed Project, impacts to agricultural resources would remain significant and unavoidable even with implementation of **MM AG-1**. Therefore, Alternative 2 would not avoid or substantially lessen significant agricultural resource impacts when compared to the proposed Project.

Air Quality

Construction activities for both Alternative 2 and the Project would produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, loose dirt from paved site access roadways, and motor vehicles transporting the construction crew. Exhaust emissions from construction activities on-site would vary daily as construction activity levels change. Grading activities produce fugitive dust emissions (PM10 and

PM2.5) from soil-disturbing activities. As discussed in **Section 4.3: Air Quality**, construction emissions associated with the proposed Project would exceed VCAPCD emission thresholds without the implementation of mitigation measures. **MM AQ-1,** which includes the use of construction equipment that meets the U.S. EPA Tier 4 final standards, would be implemented to reduce air quality emissions from construction activities to less than significant.

Alternative 2 would reduce residential development, increase commercial development, and increase open space and parks compared to the proposed Project The estimated construction emissions based on the proposed uses for Alternative 2 are shown in **Table 6.0-4: Alternative 2 Maximum Construction Emissions Without Mitigation**. As shown, construction emissions would exceed VCAPCD thresholds without the implementation of mitigation measures.

TABLE 6.0-4: ALTERNATIVE 2 MAXIMUM CONSTRUCTION EMISSIONS WITHOUT MITIGATION

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Area A						
2027	3.1	34.4	30.5	0.1	5.6	2.6
2028	1.3	9.9	17.3	<0.1	1.5	0.6
2029	1.3	9.5	17.0	<0.1	1.5	0.5
2030	1.2	9.2	16.7	<0.1	1.5	0.5
2031	24.2	8.9	16.4	<0.1	1.5	0.5
2032	24.2	6.8	12.1	<0.1	0.6	0.3
Area C						
2027	3.1	32.2	29.9	0.1	5.1	2.4
2028	4.0	9.2	14.5	<0.1	0.7	0.4
Alternative 2 Maximum	**24.2**	**34.4**	**30.5**	**0.1**	**5.6**	**2.6**
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	No	**Yes**	No	No	No	No
Proposed Project Maximum	**45.5**	**29.0**	**139.3**	**0.3**	**26.2**	**7.4**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian. Alternative 2 Air Quality, Greenhouse Gas and Energy Emissions. 2026. See **Appendix T**.

Similar to the proposed Project, **MM AQ-1** would be implemented under Alternative 2 to reduce air quality emissions during construction activities. **MM AQ-1** would ensure that construction equipment used during construction of the project shall meet the U.S. EPA Tier 4 final standards, which would reduce construction emissions to less than significant levels. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, the equipment shall, at a minimum, meet the Tier 3 standards. Zero-emissions construction equipment

may be incorporated in lieu of Tier 4 final equipment. A copy of each equipment's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each piece of equipment. As shown in **Table 6.0-5: Alternative 2 Maximum Construction Emissions with Mitigation**, air quality emission would not exceed 25 pounds per day for VOC and NO_x with the implementation of **MM AQ-1**. With implementation of this mitigation measure, construction of the proposed Project would not violate any federal or state air quality standard or contribute substantially to an existing or projected air quality standard violation, resulting in less than significant construction emissions with mitigation incorporated.

TABLE 6.0-5: ALTERNATIVE 2 MAXIMUM CONSTRUCTION EMISSIONS WITH MITIGATION

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Area A						
2027	1.0	13.5	38.6	0.1	4.7	1.8
2028	0.8	4.0	19.3	<0.1	1.3	0.4
2029	0.7	3.9	19.0	<0.1	1.3	0.4
2030	0.7	3.8	18.7	<0.1	1.3	0.4
2031	23.9	3.8	18.5	<0.1	1.3	0.4
2032	23.9	3.1	12.8	<0.1	0.5	0.2
Area C						
2027	0.9	11.4	38.3	<0.1	4.3	1.6
2028	3.7	3.3	16.5	<0.1	0.5	0.2
Alternative 2 Maximum	**23.9**	**13.5**	**38.6**			
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	No	No	No	No	No	No
Proposed Project Maximum	**23.7**	**13.5**	**42.4**	**0.1**	**7.1**	**1.8**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian. Alternative 2 Air Quality, Greenhouse Gas and Energy Emissions. 2026. See **Appendix T**.

As with the proposed Project, operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities associated with the uses under Alternative 2. Source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. As discussed in **Section 4.3: Air Quality**, the proposed Project operational emissions would exceed VCAPCD thresholds and would contribute to an existing federal or State air quality standard violation and would have a significant impact. The estimated operational emissions based on the proposed uses for Alternative 2 are shown in **Table 6.0-6: Alternative 2 Maximum Daily Operational Emissions**. As shown, operational emissions would be reduced compared to the proposed Project due to the reduction of area emissions from the reduced residential units. Because

Alternative 2 would not exceed VCAPCD mass daily emissions thresholds, operational air quality impacts would be less than significant and therefore comparatively less than the significant and unavoidable impacts associated with the proposed Project.

TABLE 6.0-6: ALTERNATIVE 2 MAXIMUM DAILY OPERATIONAL EMISSIONS

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Mobile	1.4	0.9	8.1	<0.1	2.2	0.6
Area	5.5	0.1	9.8	<0.1	<0.1	<0.1
Energy	<0.1	0.7	0.3	<0.1	0.1	0.1
Total Project (Areas A and C)	**6.9**	**1.7**	**18.2**	**<0.1**	**2.3**	**0.7**
Total Del Sol High School Emissions (Area B)	13.8	22.8	68.1	0.2	22.2	6.1
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Alternative 2 Total Emissions (Areas A, B, and C)	**20.7**	**24.5**	**86.3**	**0.2**	**24.5**	**6.8**
Threshold exceeded?	No	No	No	No	No	No
Proposed Project Total Emissions (Areas A, B, and C)	**45.5**	**29.0**	**139.3**	**0.3**	**26.2**	**7.4**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NO_x = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SO_x = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian. Alternative 2 Air Quality, Greenhouse Gas and Energy Emissions. 2026. See **Appendix T**.

Biological Resources

Development under Alternative 2 would occur within Areas A and C of the Project Site, which contain disturbed land, fallow agricultural land, coyote brush scrub, and developed areas similar to those analyzed for the proposed Project. As discussed in **Section 4.4: Biological Resources**, these areas provide potential habitat for special-status wildlife species, including nesting migratory birds, burrowing owl, roosting bats, and other special-status species that may use the site for foraging or shelter.

Construction activities under Alternative 2 would involve grading, vegetation removal, and other ground-disturbing activities that could result in direct mortality, nest abandonment, or disturbance of special-status species in the absence of mitigation. Although Alternative 2 would reduce overall development intensity and increase park and open space compared to the proposed Project, development would still occur within the same general areas and would affect the same biological resources. Accordingly, impacts to biological resources under Alternative 2 would be potentially significant without mitigation.

Alternative 2 would include implementation of the same biological resource mitigation measures identified for the proposed Project. **MM BIO-1** requires pre-construction surveys for nesting migratory birds and raptors, establishment of species-appropriate avoidance buffers around active nests, and monitoring by a qualified biologist to ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code. This measure would avoid direct impacts to nesting birds and reduce impacts to less than significant. **MM BIO-2** requires focused pre-construction surveys, implementation of avoidance buffers around occupied burrows, and, where avoidance is not feasible, passive relocation and exclusion under the supervision of a qualified biologist in coordination with the California Department of Fish and Wildlife. This measure would prevent direct mortality and disturbance of burrowing owls and reduce impacts to less than significant. **MM BIO-3** requires pre-construction surveys of structures and trees with bat roosting potential, seasonal restrictions on removal where roosts are present, and implementation of exclusion measures under biological supervision if roosting bats are identified. This measure would avoid impacts to roosting bats and reduce impacts to less than significant. With implementation of **MM BIO-1**, **MM BIO-2**, and **MM BIO-3**, construction-related impacts to special-status wildlife species and nesting birds under Alternative 2 would be reduced to less than significant.

The Project Site does not contain riparian habitat, wetlands, or other sensitive natural communities regulated by federal, State, or local agencies, and Alternative 2 would not result in impacts to such resources. In addition, the Project Site is located within an urbanized area and does not function as a regional wildlife corridor. Therefore, Alternative 2 would not interfere with wildlife movement or established wildlife corridors.

Overall, although Alternative 2 would reduce development intensity compared to the proposed Project, it would affect the same biological resource areas and implementation of the same biological resource mitigation measures identified for the proposed Project would reduce impacts to less than significant. These conditions are inherent to the Project Site and would apply regardless of development intensity. Therefore, impacts related to biological resources under Alternative 2 would be similar to those associated with the proposed Project, and impacts would remain less than significant.

Cultural Resources

As discussed in **Section 4.5: Cultural Resources**, the Project Site contains historic resources, including the main residence, barn, garage/living quarters, and associated ranch buildings which are eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and/or as City Landmarks. Development under Alternative 2 would occur within Areas A and C and would involve demolition, grading, and other ground-disturbing activities similar to those proposed with the Project.

Implementation of Alternative 2 would require demolition or alteration of eligible historic resources and ground disturbance in areas with the potential to contain previously unidentified archaeological

resources. Accordingly, without mitigation, Alternative 2 would result in significant impacts related to historical and archaeological resources, similar to those identified for the proposed Project.

Alternative 2 would implement the same cultural resources mitigation measures identified for the proposed Project. **MM CUL-1** requires preparation of Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER)–level documentation, archival photography, and historical research prior to demolition or alteration of eligible historic structures and prior to the City of Oxnard's acceptance of any property within Area C. This measure would ensure that the historical significance of the Maulhardt Ranch resources is permanently documented and preserved in archival form. **MM CUL-2** requires that a qualified archaeologist be retained to monitor ground-disturbing activities in areas with archaeological sensitivity and establishes procedures for the evaluation, documentation, and treatment of any archaeological resources discovered during construction. This measure would avoid or minimize damage to previously unidentified archaeological resources and reduce impacts to less than significant. With implementation of **MM CUL-2**, impacts to archaeological resources under Alternative 2 would be reduced to less than significant, similar to the proposed Project.

Although Alternative 2 would reduce overall development intensity compared to the proposed Project, it would still involve development within Areas A and C and would require demolition and ground disturbance affecting the same cultural resources identified for the Project. These conditions are inherent to the Project Site and would apply regardless of development intensity. As a result, Alternative 2 would not avoid or substantially lessen cultural resource impacts when compared to the proposed Project.

Energy

Alternative 2 would reduce the residential development, increase commercial development, and increase open space and parks, which would result in a reduced demand for electricity and transportation fuels during construction, and a reduced demand for electricity, natural gas, and transportation fuels during operation. **Table 6.0-7: Summary of Fuel Use During Construction of Alternative 2** summarizes the quantity of petroleum fuels that would be consumed during construction. As shown in **Table 6.0-7**, 279,639 gallons of fuel would be used during construction, which is less than the 786,731 gallons of fuel that would be used under the proposed Project. Approximately 5,626 kilowatt-hour (kWh) of electricity would be used during construction for water conveyance for dust control, and on limited basis, may be used to power lighting, which would be the same compared to the proposed Project.

TABLE 6.0-7: SUMMARY OF FUEL USE DURING CONSTRUCTION OF ALTERNATIVE 2

Fuel Type	Quantity
Area A	
Off-Road Construction Equipment	108,650 gallons

TABLE 6.0-7: SUMMARY OF FUEL USE DURING CONSTRUCTION OF ALTERNATIVE 2	
Fuel Type	**Quantity**
Construction Worker	68,545 gallons
Construction Vendor (MDH & HHD Trucks)	29,536 gallons
Construction Hauling	57,521 gallons
Area C	
Off-Road Construction Equipment	26,513 gallons
Construction Worker	7,647 gallons
Construction Vendor (MDH & HHD Trucks)	2,217 gallons
Construction Hauling	8,549 gallons
Total	**279,639 gallons**

Source: Meridian. Alternative 2 Air Quality, Greenhouse Gas and Energy Emissions. 2026. See **Appendix T**.

All construction equipment and vehicles would comply with applicable California Air Resources Board (CARB) regulations, including anti-idling limits and the use of fuel-efficient engines. Construction activities would represent a short-term and temporary demand for energy and would not require unusual or energy-intensive equipment or practices. Construction of the proposed Project would require the use of various forms of energy. Therefore, construction energy consumption under Alternative 2 would not be wasteful, inefficient, or unnecessary, resulting in less than significant impacts.

During operation, energy consumption under Alternative 2 would be reduced compared to the proposed Project due to the reduced residential development intensity. Energy consumption would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project Site) and facilities energy demands (energy consumed by building operations and site maintenance activities). Operations-related fuel consumption was calculated using the annual vehicles miles traveled (VMT) from California Emissions Estimator Model (CalEEMod) output, and using information generated from the CARB 2021 Emission Factors (EMFAC) model. **Table 6.0-8: Alternative 2 Estimated Vehicle Operations Fuel Consumption** shows that an estimated 258,039 gallons of gasoline and 43,531 gallons of diesel fuel would be consumed per year for the operation of buildout that would result from the development of Alternative 2, which would be less than the 273,372 gallons of gasoline and 46,117 gallons of diesel fuel that would be consumed under the proposed Project.

TABLE 6.0-8: ALTERNATIVE 2 ESTIMATED VEHICLE OPERATIONS FUEL CONSUMPTION			
Land Use	**Annual VMT**	**Gasoline Usage (gallons)**	**Diesel Usage (gallons)**
Del Sol High School	8,127,222	229,411	38,701
Apartment Low Rise	128,221	3,619	611

TABLE 6.0-8: ALTERNATIVE 2 ESTIMATED VEHICLE OPERATIONS FUEL CONSUMPTION

Land Use	Annual VMT	Gasoline Usage (gallons)	Diesel Usage (gallons)
Retail	886,000	25,009.5	4,219.0
Alternative 2 Total	**9,141,443**	**258,039**	**43,531**
Proposed Project Total	**9,684,632**	**273,372**	**46,117**

Source: See **Appendix E**.

The annual natural gas and electricity demands are contained in the CalEEMod output are provided in **Table 6.0-9: Alternative 2 Annual Operational Energy Demand Summary**. As shown, the estimated electricity demand for Alternative 2 is approximately 2.8 million kWh (2.8 gigawatt-hour (GWh)) per year, compared to the approximately 5.8 million kWh (5.8 GWh) per year for the proposed Project. The estimated natural gas consumption for Alternative 2 is approximately 5.9 million thousand British Thermal Units kBTU (5.8 million cubic feet (MMcf)) compared to the 17.5 million kBTU (17.5 MMcf) per year for the proposed Project.

TABLE 6.0-9: ALTERNATIVE 2 ANNUAL OPERATIONAL ENERGY DEMAND SUMMARY

Land Use	Electricity (kWh/yr)	Water Usage		Water-Related Electricity Use (kWh/yr)	Total Annual Electricity Use (kWhr)	Total Annual Natural Gas Use (kBTU/yr)
		Indoor (gal/yr)	Outdoor (gal/yr)			
Del Sol High School	1,710,370	11,440,596	28,580,043	229,522	1,939,892	3,330,720
Apartment Low Rise	493,715	4,775,832	151,094	33,311	527,026	2,289,646
Retail	586,218	4,444,351	51,710	30,527	616,745	358,788
Park	0	0	0	0	0	0
Alternative 2 Total	**2,790,303**	**20,660,779**	**28,782,847**	**293,359.7**	**3,083,663**	**5,979,154**
Proposed Project Total	**5,823,635**	**50,411,751**	**30,222,847**	**503,515.2**	**6,327,150**	**17,502,396**

Notes: kWh/yr = kilowatt-hours per year; kBtu/yr = thousand British Thermal Units per year

Source: Meridian. Alternative 2 Air Quality, Greenhouse Gas and Energy Emissions. 2026. See **Appendix T**.

Alternative 2 would also comply with the latest Title 24 Building Energy Efficiency Standards, the CALGreen Code, and City design and sustainability requirements detailed in **Section 4.6: Energy**, ensuring efficient building energy performance and reduced reliance on fossil fuels.

Alternative 2 would be developed consistent with applicable State and local energy plans, including the California Building Standards Code, the Southern California Association of Governments' (SCAG) Connect SoCal Plan, and the City of Oxnard Climate Action and Adaptation Plan (CAAP), which

collectively promote energy efficiency, renewable energy generation, and reduced vehicle miles traveled.

Overall, Alternative 2 would result in reduced energy consumption during both construction and operation compared to the proposed Project due to its smaller scale and reduced development footprint. Alternative 2 would not result in the wasteful, inefficient, or unnecessary use of energy resources and would remain consistent with applicable State and local plans for renewable energy and energy efficiency. Therefore, impacts related to energy under Alternative 2 would be reduced compared to those associated with the proposed Project, and impacts would remain less than significant.

Geology and Soils

As described in **Section 4.7: Geology and Soils**, the Project Site is located in a seismically active region of Southern California and is subject to geologic conditions including strong seismic ground shaking, liquefaction, settlement, expansive soils, and the potential presence of paleontological resources. These conditions are inherent to the Project Site and would apply regardless of development intensity. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and no known active faults traverse the site; therefore, Alternative 2 would not expose people or structures to surface fault rupture. However, structures developed under Alternative 2 would remain subject to strong seismic ground shaking and could be affected by liquefaction, settlement, and expansive soil conditions without appropriate design measures.

As with the proposed Project, Alternative 2 would implement the same geology and soils mitigation measures. **MM GEO-1** requires preparation of a site-specific geotechnical investigation and incorporation of its recommendations into project design and construction. This measure addresses potential impacts related to seismic ground shaking, liquefaction, settlement, expansive soils, and slope stability through appropriate foundation design, ground improvement measures, and compliance with applicable building codes, thereby reducing geology and soils impacts to less than significant levels.

Ground-disturbing activities associated with Alternative 2 also have the potential to expose previously unknown paleontological resources preserved in underlying geologic formations. In the absence of mitigation, impacts related to geologic hazards and paleontological resources would be potentially significant. **MM GEO-2** requires monitoring by a qualified paleontologist during ground-disturbing activities in geologically sensitive areas and establishes procedures for the evaluation, documentation, and treatment of any paleontological resources discovered during construction. This measure would ensure that paleontological resources are properly identified and preserved or documented, reducing impacts to paleontological resources to less than significant levels.

With implementation of **MM GEO-1** and **MM GEO-2**, impacts related to geology, soils, and paleontological resources under Alternative 2 would be reduced to less than significant, similar to the proposed Project.

Although Alternative 2 would reduce overall development intensity compared to the proposed Project, it would not change the underlying geologic conditions of the Project Site and would involve similar types of grading and construction activities within Areas A and C. Therefore, impacts related to geology and soils under Alternative 2 would be similar to those associated with the proposed Project, and impacts would remain less than significant with mitigation incorporated.

Greenhouse Gas Emissions

Construction activities for both Alternative 2 and the Project would produce combustion GHG emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, loose dirt from paved site access roadways, and motor vehicles transporting the construction crew. Exhaust emissions from construction activities on-site would vary daily as construction activity levels change. Alternative 2 would reduce the residential development intensity, increase commercial buildout, and increase open space and parks. The estimated construction emissions under Alternative 2 are shown in **Table 6.0-10: Alternative 2 Construction GHG Emissions.** As shown, construction GHG emissions would be lower compared to the proposed Project by approximately 3,833 metric tons of carbon dioxide ($MTCO_2e$).

TABLE 6.0-10: ALTERNATIVE 2 CONSTRUCTION GHG EMISSIONS

Construction Phase	$MTCO_2e$/Year
Area A	
2027	1,248
2028	469
029	463
2030	460
2031	439
2032	60
Area C	
2027	489
2028	143
Alternative 2 Total Construction Emissions	**3,771**
30-Year Annual Amortized Rate	**126**
Proposed Project Total Construction Emissions	**7,604**

Notes: GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: Meridian. Alternative 2 Air Quality, Greenhouse Gas and Energy Emissions. 2026. See **Appendix T**.

Alternative 2 would generate GHG emissions from individual sources after development. Similar to the Project, operational GHG emissions generated by both stationary and mobile sources would result from normal day-to-day activities associated with the uses under Alternative 2. Under this Alternative there would be a reduction in development of residential units, an increase in commercial buildout, and an increase in open space and parks compared to the Project, which would result in a reduction in demand for electricity, natural gas and transportation during operation. The estimated operational emissions under Alternative 2 are shown in **Table 6.0-11: Alternative 2 Operational GHG Emissions.** As shown, operational GHG emissions would be lower compared to the proposed Project by approximately 2,104 $MTCO_2e$.

TABLE 6.0-11: ALTERNATIVE 2 OPERATIONAL GHG EMISSIONS

Source	Alternative 2 $MTCO_2e$ per year[a]	Proposed Project $MTCO_2e$ per year[a]	Difference
Construction (amortized)	126	254	-128
Mobile	309	475	-166
Area	2	12	-10
Energy	402	1,928	-1,526
Water	30	119	-89
Waste	50	233	-183
Refrigerants	<1	1	-1
Total	**919**	**3,023**	**-2,104**

Notes: $MTCO_2e$ = metric tons of carbon dioxide emissions.

Source: Meridian. Alternative 2 Air Quality, Greenhouse Gas and Energy Emissions. 2026. See **Appendix T**.

This Alternative would be required to adhere to regulatory compliance measures designed to reduce GHG emissions such as the as the City's General Plan, CALGreen Building Codes, Title 24 requirements and the City's Climate Action and Adaptation Plan (CAAP) as detailed in **Section 4.8: Greenhouse Gas Emissions**. Additionally, this alternative would not conflict with applicable plans including the CARB Climate Change Scoping Plan and SCAG 2020-2045 RTP/SCS as Alternative 2 is planned development. Alternative 2 would remain consistent with these planning frameworks because the development proposed under this alternative would occur within an area designated for urban development under the City's General Plan and would incorporate land use patterns and transportation improvements consistent with regional GHG reduction strategies. As such, this alternative would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions. As such, this alternative would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, impacts related to GHG under Alternative 2 would result in reduced impacts to GHG compared with the proposed Project, and impacts would remain less than significant.

Hazards and Hazardous Materials

As detailed in **Section 4.9: Hazards and Hazardous Materials**, the Project Site was historically used for agricultural operations, and soil sampling identified residual organochlorine pesticides (OCPs), including dichlorodiphenyltrichloroethane (DDT), dichlorodiphenyldichloroethylene (DDE), dichlorodiphenyldichloroethane (DDD), and toxaphene, at concentrations consistent with historical agricultural use. Detected concentrations were below or only slightly above Department of Toxic Substances Control (DTSC) residential screening levels, and associated cancer risk estimates were within or near the lower end of the U.S. Environmental Protection Agency's (EPA's) acceptable target risk range. Arsenic concentrations were consistent with natural background levels for Southern California soils. A DTSC-approved risk assessment concluded that no further action would be required to support residential development at the Project Site.

Under Alternative 2, development within Areas A and C would involve grading, excavation, and construction activities similar to those evaluated for the proposed Project. Construction activities would involve the limited use of common hazardous materials, such as fuels, solvents, and paints. These materials would be stored, handled, and disposed of in accordance with applicable federal, State, and local regulations, including the Resource Conservation and Recovery Act (RCRA), the California Hazardous Waste Control Act (HWCA), and oversight by the City's Certified Unified Program Agency (CUPA) through the Oxnard Fire Department. Compliance with these requirements would minimize the potential for hazards related to the use, transport, or accidental release of hazardous materials, and any spills or leaks would be addressed in accordance with applicable cleanup standards.

During operation, residential uses, neighborhood-serving commercial uses, and open space developed under Alternative 2 would involve the routine use of household cleaning products and landscaping materials typical of residential neighborhoods. These substances would be used and stored in compliance with manufacturer instructions and applicable regulations, resulting in less than significant impacts related to hazardous materials during operation.

The Project Site is not listed on the Cortese List pursuant to Government Code Section 65962.5, does not contain active oil or gas wells, and is not adjacent to known hazardous waste facilities. Accordingly, the potential for long-term exposure of residents or the environment to hazardous materials under Alternative 2 would be less than significant.

Del Sol High School is located immediately south of Area A, and Rio Rosales and Norman R. Brekke Elementary Schools are located within one-quarter mile of the Project Site. Because residual pesticide concentrations are below regulatory levels of concern and only small quantities of household chemicals would be used during operation, development under Alternative 2 would not result in hazardous materials releases that could adversely affect nearby schools.

The Project Site is not located within an airport land use plan area, near an active oil extraction area, or within a designated wildfire hazard area. Development under Alternative 2 would comply with City emergency response and access requirements and would not impair the implementation of, or physically interfere with, adopted emergency response or evacuation plans.

Overall, hazards and hazardous materials impacts under Alternative 2 would be similar to those identified for the proposed Project. Prior testing has confirmed that residual pesticide concentrations are below levels of concern and no remediation is required. These conditions are inherent to the Project Site and would apply regardless of development intensity. Continued compliance with applicable federal, State, and local hazardous materials regulations would ensure that impacts remain less than significant. Therefore, impacts related to hazards and hazardous materials under Alternative 2 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Hydrology and Water Quality

As discussed in **Section 4.10: Hydrology and Water Quality**, the Project Site generally drains south toward the Rice Road Drain. Under the Rice Road Watershed Agreement between the City and the Ventura County Watershed Protection District (VCWPD), discharge from the Project Site is limited to a maximum allowable rate of one cubic foot per second per acre (1 cfs/ac) to prevent downstream flooding.

Similar to the proposed Project, development under Alternative 2 would increase impervious surface area and generate stormwater runoff that would be directed to the Rice Road Drain system. Construction activities under Alternative 2 could temporarily increase erosion, sedimentation, and pollutant discharges during storm events associated with grading and earthmoving activities. However, as with the proposed Project, development under Alternative 2 would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the State General Construction Permit. Implementation of construction best management practices would minimize construction-related runoff and sediment transport. Accordingly, construction-period impacts to hydrology and water quality under Alternative 2 would be less than significant.

Stormwater runoff generated under Alternative 2 would be managed through on-site drainage and treatment measures designed in compliance with the City's Municipal Separate Storm Sewer System (MS4) Permit and an approved Water Quality Management Plan (WQMP). These measures would be designed to control runoff rates, reduce pollutant loading, and maintain consistency with downstream drainage capacity. Similar to the proposed Project, development under Alternative 2 would not substantially alter existing drainage patterns, increase downstream flooding, or degrade water quality within the Rice Road Drain or receiving waters.

The Project Site is not located within a FEMA-designated 100-year floodplain, and development under Alternative 2 would not occur within a FEMA-designated flood hazard area or redirect flood

flows in a manner that would increase on-site or off-site flood hazards. Therefore, flood-related impacts would be less than significant.

Overall, hydrology and water quality impacts under Alternative 2 would be similar to those of the proposed Project. Although development under Alternative 2 would occur across Areas A and C, stormwater runoff would be managed through compliance with MS4 permit requirements, implementation of a SWPPP and WQMP, and adherence to applicable flood control standards. Therefore, impacts related to hydrology and water quality under Alternative 2 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Land Use and Planning

Alternative 2 assumes development of the Project Site consistent as allowed by the current General Plan land use designations and zoning regulations, without adoption of the Sub-Neighborhood Plan or other discretionary land use approvals. As described, Alternative 2 would include development of up to 126 residential units, 60,000 square-feet of commercial space, and 34 acres of park and open space in Areas A and C.

Alternative 2 would not create land use conflicts, divide an established community, or conflict with adopted regional or local land use plans because development would occur under the Project Site's existing General Plan land use and zoning designations. As a result, no discretionary land use amendments would be required, and development would remain consistent with City land use policies, including policies from the City's General Plan EIR, NECSP, and SCAG's SoCal Connect. Therefore, impacts related to land use and planning under Alternative 2 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Mineral Resources

As shown in **Figure 4.12-1: Mineral Resources**, Area A is designated Mineral Resource Zone 2 (MRZ-2) and MRZ-4. MRZ-2 areas contain known significant mineral deposits, and MRZ-4 areas have uncertain mineral potential due to limited data. The MRZ-2 portion of the Project Site is also identified within Mineral Sector C of the CGS Special Report 253, which contains regionally significant construction aggregate resources.

However, the Project Site and surrounding uses have transitioned to urban development, including Del Sol High School within Area B and existing residential development in all surrounding directions. Therefore, the Project Site and nearby areas are no longer compatible with mineral resource extraction activities due to existing land use conflicts, limited accessibility, and permanent urban improvements. Furthermore, the City's General Plan and the NECSP designate the Project Site for residential, commercial, and park uses rather than mineral extraction.

Figure 4.12-2: Oil and Gas Fields and Wells, identifies that the Project Site is located within the Oxnard Oil Field. However, the California Geologic Energy Management Division (CalGEM) database

confirms that no active or idle oil or gas wells exist within or adjacent to the Project Site. These conditions are inherent to the Project Site and would apply regardless of development intensity. Thus, Alternative 2 would not affect oil or gas resources. Therefore, impacts related to mineral resources under Alternative 2 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Noise

Both Alternative 2 and the proposed Project would require earthmoving activities during construction and would involve the use of heavy equipment, such as air compressors, backhoes, generators, graders, pavers, rollers, and scrapers. As modeled in CalEEMod, the same representative equipment list was conservatively assumed for both scenarios because Alternative 2 would require similar grading and building construction activities. Construction under Alternative 2 would differ from the Project as this Alternative would reduce the residential development intensity, increase commercial buildout, and increase open space and parks. However, both Alternative 2 and the proposed Project would utilize the same construction methods, equipment types, and phases. The reduction in development intensity does not eliminate or modify the construction activities that generate the highest noise levels. As shown in **Table 6.0-12: Alternative 2 Construction Maximum Noise Estimates**, construction noise levels would exceed the 80 A-weighted decibels (dBA) (Leq, 8hr) threshold by a maximum of 6.6 dBA at Site 1 during grading of Area A without the implementation of technically feasible noise reduction measures.

TABLE 6.0-12: ALTERNATIVE 2 CONSTRUCTION MAXIMUM NOISE ESTIMATES

Site	Nearest Off-Site Building Structures	Calculated Noise Level (Leq,1hr) by Construction Phase					Significance Threshold	Increase above Significance Threshold
		Demolition	Grading	Building Construction	Paving	Architectural Coating		
				Phase A				
1	**Single-family residential uses along Milagro Place and Gibraltar Street**	—	86.6	85.3	80.0	72.1	80	+6.6
2	**Single-family residential uses along Festivo Street and Del Sol High School**	—	65.7	64.3	59.1	51.1	80	+0.0
3	**Multi-family residential uses along Camino Del Sol**	—	58.3	56.9	51.7	43.8	80	+0.0
4	**Single-family residential**	—	65.7	64.4	59.1	51.2	80	+0.0

TABLE 6.0-12: ALTERNATIVE 2 CONSTRUCTION MAXIMUM NOISE ESTIMATES

Site	Nearest Off-Site Building Structures	Calculated Noise Level (Leq,1hr) by Construction Phase					Significance Threshold	Increase above Significance Threshold
		Demolition	Grading	Building Construction	Paving	Architectural Coating		
	uses along Valentina Drive							
5	Single-family residential uses along Vivana Drive	—	75.1	73.8	68.6	60.6	80	+0.0
6	Single-family residential uses along Cesar Chavez Drive	—	84.1	82.8	77.5	69.6	80	+4.1
7	Del Sol High School	—	68.2	66.9	61.6	53.7	80	+0.0
				Phase C				
1	Single-family residential uses along Milagro Place and Gibraltar Street	55.6	56.9	56.0	53.5	42.8	80	+0.0
2	Single-family residential uses along Festivo Street and Del Sol High School	58.8	60.2	59.3	56.8	46.1	80	+0.0
3	Multi-family residential uses along Camino Del Sol	70.9	72.2	71.3	68.9	58.1	80	+0.0
4	Single-family residential uses along Valentina Drive	73.4	74.7	73.8	71.4	60.6	80	+0.0
5	Single-family residential uses along Vivana Drive	59.6	61.0	60.0	57.6	46.8	80	+0.0
6	Single-family residential uses along Cesar Chavez Drive	55.9	57.3	56.3	53.9	43.1	80	+0.0
7	Del Sol High School	80.4	81.8	80.8	78.4	67.7	80	+1.8

TABLE 6.0-12: ALTERNATIVE 2 CONSTRUCTION MAXIMUM NOISE ESTIMATES

Site	Nearest Off-Site Building Structures	Calculated Noise Level (Leq,1hr) by Construction Phase					Significance Threshold	Increase above Significance Threshold
		Demolition	Grading	Building Construction	Paving	Architectural Coating		

Notes: No demolition is taking place during Phase A of construction as the site is vacant and undeveloped.

Source: FHWA, RCNM, version. 1.1. Meridian Consultants. *Noise Study*. **Appendix O.**

Similar to the proposed Project, Alternative 2 would implement **MM NOI-1,** which would include the retrofit of mobile equipment with optimal muffler systems capable of reducing construction noise levels by 10 dBA or more, in order to minimize temporary construction noise impacts on nearby sensitive receptors. Additionally, both this alternative and the proposed Project would comply with Section 7-188[0] of Oxnard City Code (OCC) by ensuring construction activities would occur during the hours 7:00 AM and 6:00 PM on weekdays or Saturdays only.

During operation, noise would be generated primarily from vehicular traffic associated with residential and commercial uses, building mechanical systems, and typical neighborhood activity. Overall, the noise generated by Alternative 2's land uses would be consistent with the ambient noise levels in the Project Site, which range from 55.0 to 68.9 dB(A). Therefore, operational noise impacts would be less than significant.

Groundborne vibration generated by construction equipment such as excavators and dozers. As described above, Alternative 2 would utilize the same general construction activities, equipment types, and construction phases within the same Project Site as the Proposed Project. As shown in **Table 6.0-13: Alternative 2 Construction Vibration Levels**, development under Alternative 2 would be similar to the proposed Project and would not exceed significant vibration thresholds. Similar to existing conditions, the primary sources of vibration associated with operation would include passenger-vehicle circulation within the Project area and stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. Ground-borne vibration typically attenuates rapidly as a function of distance from the vibration source. Furthermore, the majority of the vibration sources, such as mechanical equipment, would incorporate vibration attenuation mounts as required by the particular equipment specifications. Therefore, Alternative 2 would have less than significant vibration impacts during construction and operation.

TABLE 6.0-13: ALTERNATIVE 2 CONSTRUCTION VIBRATION LEVELS

Site	Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment					Significance Threshold (PPV ips)
		Vibratory Roller	Loaded Trucks	Jackhammer	Large Bulldozer	Small Bulldozer	
Phase A							

TABLE 6.0-13: ALTERNATIVE 2 CONSTRUCTION VIBRATION LEVELS

Site	Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment					Significance Threshold (PPV ips)
		Vibratory Roller	Loaded Trucks	Jackhammer	Large Bulldozer	Small Bulldozer	
1	**Single-family residential uses along Milagro Place and Gibraltar Street**	0.056	0.020	0.009	0.024	0.001	0.2
2	**Single-family residential uses along Festivo Street and Del Sol High School**	0.002	0.001	0.000	0.001	0.000	0.2
3	**Multi-family residential uses along Camino Del Sol**	0.000	0.000	0.000	0.000	0.000	0.2
4	**Single-family residential uses along Valentina Drive**	0.002	0.001	0.000	0.001	0.000	0.2
5	**Single-family residential uses along Vivana Drive**	0.008	0.003	0.001	0.003	0.000	0.2
6	**Single-family residential uses along Cesar Chavez Drive**	0.037	0.013	0.006	0.0016	0.001	0.2
7	**Del Sol High School**	0.002	0.001	0.000	0.001	0.000	0.2
	Phase C						
1	**Single-family residential uses along Milagro Place and Gibraltar Street**	0.000	0.000	0.000	0.000	0.000	0.2
2	**Single-family residential uses along Festivo Street and Del Sol High School**	0.001	0.000	0.000	0.000	0.000	0.2
3	**Multi-family residential uses along Camino Del Sol**	0.005	0.002	0.001	0.002	0.000	0.2
4	**Single-family residential uses along Valentina Drive**	0.008	0.003	0.001	0.003	0.000	0.2
5	**Single-family residential uses along Vivana Drive**	0.001	0.000	0.000	0.000	0.000	0.2
6	**Single-family residential uses along Cesar Chavez Drive**	0.000	0.000	0.000	0.000	0.000	0.2
7	**Del Sol High School**	0.026	0.010	0.004	0.011	0.000	0.2

Source: US Department of Transportation, Federal Transportation Authority, *Transit Noise and Vibration Impact Assessment*. Meridian Consultants. *Noise Study*. **Appendix O.**

The Project Site is located approximately 2.0 miles east of the Oxnard Airport; however, the Project Site is not located within the Oxnard Airport noise contours. As such, the location of the Project Site

would not result in excessive noise for residents or employees in the Project area. Therefore, impacts would less than significant.

Overall, Alternative 2 would result in similar temporary and long-term noise impacts compared to the proposed Project. Alternative 2 would still require implementation of **MM NOI-1** and adherence to applicable City noise standards, which would reduce construction noise impacts to less than significant levels. Therefore, impacts related to noise under Alternative 2 would be similar to than those associated with the proposed Project, and impacts would remain less than significant with mitigation incorporated.

Population and Housing

Alternative 2 would generate temporary employment related to grading and building construction. Construction workforces in the City and surrounding Ventura County region are large and diverse, and construction labor needs would be met by existing regional workers. Construction would be phased and limited in duration and would not require the permanent in-migration of workers. As a result, construction under Alternative 2 would not directly or indirectly induce population growth.

The development of up to 126 residential units would introduce new residents to the City. Based on the Household Size Assumption and Population Estimation Memorandum (**Appendix P**), the average household sizes for the proposed housing types range from 1.84 to 2.4 persons per unit. At full buildout, Alternative 2 would generate an estimated population of approximately 232-302 persons, lower than the proposed Project's 2,064 population generation. This would represent a small portion of the City's anticipated population growth under the SCAG Connect SoCal growth forecast, which estimates that Oxnard will grow by approximately 29,867 residents between 2025 and 2050. Therefore, the population increase associated with Alternative 2 would fall within regional growth projections and would not induce substantial unplanned population growth.

Alternative 2 would also contribute to the City's housing supply by providing 126 new housing units, including required affordable housing units consistent with the City's Inclusionary Housing Program. SCAG projects that the City will add approximately 12,248 new housing units by 2050. The 126 units developed under Alternative 2 would represent a fraction of this growth and would be consistent with the City's Housing Element and RHNA obligations. This alternative would not introduce housing in an unplanned location or indirectly encourage development beyond what was already forecasted.

Indirect population and housing growth could occur if the proposed Project extended infrastructure into areas not currently served; however, the Project Site is already surrounded by existing roads, utilities, and development. Infrastructure improvements under Alternative 2 would primarily serve the Project Site and would not open new areas for development or induce additional off-site growth. Thus, indirect growth impacts would be less than significant.

Development under this alternative would remain consistent with SCAG's regional growth forecasts, the City's General Plan, and Housing Element objectives. Therefore, impacts related to population and housing under Alternative 2 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Public Services and Recreation

Fire Protection

With Alternative 2, development of the Project Site would occur pursuant to existing General Plan land use designations and zoning regulations and would not involve adoption of the proposed Sub-Neighborhood Plan. Compared to the proposed Project, Alternative 2 would allow a lower overall level of development and population growth, resulting in a reduced demand for fire protection and emergency response services. Similar to the proposed Project, development under Alternative 2 would be required to comply with applicable City fire protection standards, including requirements related to emergency access, fire flow, hydrant spacing, and fire suppression systems.

Although Alternative 2 would incrementally increase calls for service over time, the Oxnard Fire Department has adequate capacity to serve development under Alternative 2 from existing facilities, and no new or expanded fire facilities would be required. In addition, development under Alternative 2 would be subject to payment of applicable City development impact fees to support public safety services. Therefore, fire protection services impacts under Alternative 2 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Police Protection

Police protection services under Alternative 2 would continue to be provided by the Oxnard Police Department, which currently serves the Project Site within District 1, Beat 31. Compared to the proposed Project, Alternative 2 would result in fewer residential units and a smaller population increase, resulting in a lower demand for police services. Similar to the proposed Project, Alternative 2 would comply with City design standards related to access, visibility, and would be subject to applicable development impact fees to ensure adequate police services are maintained. The Oxnard Police Department can continue to serve the Project Site from existing facilities and staffing levels, and no new or expanded police facilities would be required. Therefore, police protection services impacts under Alternative 2 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Schools

Alternative 2 would generate fewer residential units and a smaller population increase than the proposed Project and would therefore result in the generation of fewer students within the Rio School District (RSD) and Oxnard Union High School (OUHSD) service areas. Elementary and middle school services for the Project Site are provided by RSD, and high school services are provided by OUHSD.

Consistent with the methodology used for the proposed Project, student generation estimates for Alternative 2 are based on elementary and middle school student generation rates provided by RSD and high school student generation rates provided by OUHSD. These rates were derived from the Rio School District Developer Fee Justification Study and the Oxnard Union High School District Fee Justification Report for New Residential and Commercial/Industrial Development.

The 126 residential units included in this alternative is estimated to generate approximately 43 new students in total. This includes an estimated 24 elementary school students, 11 middle school students, and 8 high school students. While it is possible that some new residents and students may relocate from other areas within the RSD or OUHSD service boundaries, for conservative analysis purposes, this evaluation assumes that all students generated under Alternative 2 would represent additional enrollment within the respective districts.

Although both RSD and OUHSD currently operate at or above capacity, development under Alternative 2 would result in a smaller increase in student enrollment compared to the proposed Project, which would generate 318 new students in total. Residential development under Alternative 2 would be subject to payment of State-mandated school impact fees pursuant to Senate Bill (SB) 50, which is considered full and complete mitigation under CEQA. Therefore, school impacts under Alternative 2 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Parks and Recreation

Alternative 2 would reduce residential development intensity compared to the proposed Project, while allowing a modest increase in commercial development and a notable increase in parks and open space. Alternative 2 would develop 34 acres of park and open space, compared to 11.27 acres under the proposed Project, representing an increase of approximately 22.7 acres. Park and open space areas would include neighborhood-serving parks and passive open space areas consistent with the existing PRK General Plan land use designation.

Alternative 2 would include up to 126 dwelling units with an associated population increase of approximately 302 persons. Based on the 34 acres of park and open space, Alternative 2 would have a parkland service ratio of approximately 112.6 acres of parkland per 1,000 residents.[3] This would exceed the City's parkland service standard of 3 acres per 1,000 residents. Under the City standard, a population of approximately 302 persons would require approximately 0.91 acre of parkland, and Alternative 2 would provide a surplus of approximately 33.09 acres.[4] In addition, Alternative 2 would exceed the proposed Project's park to population ratio of 5.46 acres per 1,000 residents.

3 (34 acres x 302 persons x 1,000) = 112.6 acres per 1,000 residents.

4 (3 acres per 1,000 residents x 0.302).

Alternative 2 would result in a lower residential buildout than the proposed Project while providing a greater amount of parkland and open space. Additionally, Alternative 2 would exceed the City's parkland service standard and provide a higher park to population ratio than the proposed Project. Therefore, park and recreation impacts under Alternative 2 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Libraries

Development under Alternative 2 would result in a lower residential population compared to the proposed Project due to the reduced residential buildout of up to 126 dwelling units. As with the proposed Project, residents under Alternative 2 would be served by the City of Oxnard Library system. However, because Alternative 2 would generate fewer residents, it would correspondingly result in a reduced demand for library services, facilities, and programming compared to the proposed Project.

Alternative 2 would generate approximately 302 residents. Using the American Library Association (ALA) minimum standard of 1.0 square foot of library space per resident and the City's existing library inventory of approximately 95,560 square feet of serving an estimated population of 198,733 persons, development under Alternative 2 would incrementally increase the City's population to approximately 199,035 persons. Thus, the ratio of library square footage per resident would remain approximately 0.48 square feet per resident, which is consistent with existing conditions and the proposed Project.

As with the proposed Project, development under Alternative 2 would be subject to the City's Growth Requirement Capital Fee, which is imposed on residential development to fund the expansion of essential public facilities, including libraries, to maintain adequate service levels. Payment of the applicable capital fee would ensure that library facilities are adequately funded to accommodate incremental demand associated with Alternative 2. Therefore, library impacts under Alternative 2 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Therefore, impacts related to public services under Alternative 2 would be similar to or slightly less than those associated with the proposed Project, and impacts would remain less than significant.

Transportation

Under Alternative 2, development would occur in compliance with the City of Oxnard General Plan land use and circulation policies, applicable zoning designations, and appliable transportation planning. As such, Alternative 2 would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

VMT associated with Alternative 2 would be lower than those generated by the proposed Project due to the substantial reduction in residential units. Residential uses are the primary contributor of VMT, and Alternative 2 would reduce residential development by approximately 824 units compared to the

proposed Project. Although Alternative 2 would increase commercial square footage, the overall trip generation and VMT would remain lower than the proposed Project. Consistent with the proposed Project analysis, Alternative 2 would not exceed applicable VMT significance thresholds and would not result in a significant transportation impact under CEQA.

With respect to roadway operations, Alternative 2 would generate fewer peak-hour vehicle trips than the proposed Project due to its reduced residential intensity. As a result, traffic volumes at analyzed intersections would be lower than those evaluated for the proposed Project. Although Alternative 2 would still introduce new traffic to the surrounding roadway network, it would not cause unacceptable deterioration of intersection level of service or roadway operations beyond those analyzed for the proposed Project. Traffic impacts under Alternative 2 would be less than significant.

During construction, Alternative 2 could temporarily affect local circulation due to construction-related vehicle trips, potential lane closures, and staging activities. However, as with the proposed Project, construction under Alternative 2 would be required to implement **MM TRANS-1**, which mandates preparation and implementation of a Construction Mitigation Plan. This plan would identify construction staging areas, haul routes, employee parking, traffic control measures, pedestrian and bicycle safety provisions, and emergency access requirements. Implementation of **MM TRANS-1** would ensure that construction-related circulation effects and potential hazards are minimized and maintained at less than significant levels, similar to the proposed Project.

Once operational, Alternative 2 would not substantially increase roadway hazards, result in unsafe geometric design features, or create inadequate emergency access. The internal roadway network and site access would be designed to City standards and reviewed by the City's Traffic Engineer, ensuring safe and adequate circulation for vehicles, pedestrians, bicyclists, and emergency responders.

Therefore, impacts related to transportation under Alternative 2 would be similar to those associated with the proposed Project, and impacts would remain less than significant with mitigation incorporated.

Tribal Cultural Resources

As described in **Section 4.17: Tribal Cultural Resources**, the Historic Resources Report did not identify any tribal cultural resources within the Project Site. Materials identified during field investigations consisted of historic-period artifacts associated with the Maulhardt family's agricultural operations and did not qualify as tribal cultural resources under Public Resources Code Section 21074.

Consistent with Senate Bill 18, the City contacted all applicable tribes, including the Santa Ynez Band of Chumash Indians and tribal contacts identified by the Native American Heritage Commission (NAHC). The Santa Ynez Band declined consultation, and the NAHC confirmed that no known sacred

sites are recorded within the Project Site. Two tribal contacts, the Barbareño/Ventureño Band of Mission Indians and the Coastal Band of the Chumash Nation requested Native American monitoring during ground disturbance. Therefore, **MM TCR-1** requires Native American monitoring during ground-disturbing construction activities and establishes procedures for the inadvertent discovery of tribal cultural resources or human remains.

With Alternative 2, development would occur pursuant to existing General Plan land use designations and zoning regulations and could occur within Areas A and C of the Project Site. Similar to the proposed Project, development under Alternative 2 would involve grading and construction activities that could disturb native soils, resulting in the potential for unanticipated discoveries of tribal cultural resources during construction. Alternative 2 would implement **MM TCR-1** to ensure appropriate Native American monitoring and treatment of any unanticipated discovery is evaluated and treated consistent with PRC §5097.98, Health and Safety Code §7050.5, and CEQA Guidelines §15064.5. With this measure, impacts to tribal cultural resources would be less than significant, similar to the proposed Project.

Therefore, impacts related to tribal cultural resources under Alternative 2 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Utilities and Service Systems

Water Service and Supply

Under Alternative 2, development of the Project Site would occur as allowed by the existing General Plan land use designations, without adoption of the proposed Sub-Neighborhood Plan. Water service be provided by the City of Oxnard, consistent with the City's existing water supply planning framework and Urban Water Management Plan (UWMP).

Alternative 2 would allow the development of up to 126 residential dwelling units, approximately 60,000 square feet of commercial uses, and 34 acres of parks and open space, resulting in a lower residential population compared to the proposed Project. As shown in **Table 6.0-14: Projected Water Demand for Alternative 2**, the annual total water demand for Areas A and C was estimated using land use–specific demand factors from the City's Public Works Integrated Master Plan (PWIMP), AB 1668/SB 606 indoor efficiency standards, and Model Efficient Water Landscape Ordinance (MEWLO) landscape guidelines, resulting in approximately 50.25 acre feet per year (afy) less than the 149.95 afy estimated for the proposed Project.

TABLE 6.0-14: PROJECTED WATER DEMAND FOR ALTERNATIVE 2

Land Use	Units (DU or AC)	Unit Usage (AFY/DU or AFY/AC)	Annual Usage (AFY)
Areas A & C			
Residential	126 DU 302 persons	0.0616 afy/person[a]	18.60 afy

TABLE 6.0-14: PROJECTED WATER DEMAND FOR ALTERNATIVE 2			
Land Use	**Units (DU or AC)**	**Unit Usage (AFY/DU or AFY/AC)**	**Annual Usage (AFY)**
Commercial	1.38 ac	2.240 afy/ac[b]	3.09 afy
Landscaping (Parks)	34 Acres	0.840 afy/ac[d]	28.56 afy
	Subtotal Areas A & C		***50.25 afy***
Area B			
High School			42.30 afy
Total Projected Water Demand:		**92.55 afy**	

Notes:

[a] *AB 1668/SB 606, which mandates a per person consumption of 55 gpd.*

[b] *City of Oxnard. Memorandum 2.2, Table 9. "2015 Public Works Integrated Master Plan." Accessed January 2026.*

[c] *ETWU per MEWLO Guidelines, assuming a blend 15% lawn area and 85% drought tolerant areas on all development lots.*

[d] *City of Oxnard. Memorandum 2.2, Table 5. "2015 Public Works Integrated Master Plan." Accessed January 2026.*

The City's UWMP demonstrates that adequate water supplies are available to serve existing and planned development within the City's service area under normal, single-dry and multiple-dry-year conditions. Development under Alternative 2 would occur within the assumptions evaluated in the UWMP and would not exceed the City's projected water supply capacity. Future development pursuant to Alternative 2 would be required to demonstrate compliance with applicable water service provider requirements, water conservation standards and regulatory approvals in effect at the time of development.

Although Alternative 2 would include an increased amount of parkland and open space compared to the proposed Project, irrigation demand associated with these areas would be subject to the City's water efficiency requirements, including drought-tolerant landscaping standards and use of efficient irrigation systems, consistent with City policies and State regulations.

Alternative 2 would not require the construction of new or expanded water supply facilities or infrastructure beyond those already planned for General Plan buildout. Therefore, water supply impacts under Alternative 2 would be similar to or less than those associated with the proposed Project, and impacts would be less than significant.

Wastewater Collection and Treatment

Wastewater service under Alternative 2 would be provided by the City of Oxnard wastewater collection and treatment system. The City owns and operates its own wastewater collection and treatment system, the OWTP, which has permitted capacity of 31.7 mgd, an average daily flow of 16 mgd, a historic average dry weather flow of approximately 20 mgd, and an expected increase to 27.5 mgd by 2040. According to the City's latest wastewater generation information in 2020, the City

collected a volume of approximately 17 mgd (19,088 afy) of wastewater within the City's service area.[5]

Development of Alternative 2 would generate wastewater from residential and commercial uses associated with buildout of up to 126 dwelling units and approximately 60,000 square feet of commercial space, while the park/open space component would not generate wastewater flows typical of indoor uses. **Table 6.0-15: Projected Sewage Generation for Alternative 2** shows that Alternative 2 would generate approximately 26,853 gpd, or 0.027 mgd of wastewater. Based on the reduced intensity of development compared to the proposed Project, overall wastewater flows under Alternative 2 would be substantially lower than those associated with the proposed Project, which would generate approximately 66,452 gpd, or 0.066 mgd of wastewater. As with the proposed Project, any future development under Alternative 2 would be reviewed to confirm adequate conveyance and treatment capacity is available and to ensure compliance with State and local wastewater requirements for operation and maintenance of the sanitary sewer system.

TABLE 6.0-15: PROJECTED SEWAGE GENERATION FOR ALTERNATIVE 2

Land Use	Acreage	Wastewater Duty Factor (gpad)	Wastewater Flow (gpd)	Wastewater Flow (gpm)[2]
126 DU	10.5	2,380	24,990	17.35
Commercial	1.38	1,350	1,863.00	1.29
Total Average Daily Flow			**26,853.00**	**18.65**
Total Peak Dry Weather Flow (PDWF = 1.81)[1]			**48,603.93**	**33.75**
RDI/I[3]	11.88	600	7,128	4.95
Total Peak Wet Weather Flow			**55,731.93**	**38.70**

gpad = gallons per acre per day gpd = gallons per day gpm = gallons per minute RDI/I = Rainfall Dependent Inflow/Infiltration

Notes:

1 *The peak dry weather factor was calculated using the following equation as given in the 2005 Draft Oxnard Wastewater Master Plan Update: Peak Dry Weather Factor = 1.73 x (Average Dry Weather Flow Rate)-0.0337. This produced a Peak Dry Weather Factor of 1.81 for the average day flow resulting in a Peak Dry Weather Flow of 312 gpm.*

2 *The gallons per minute was calculated using by dividing gallons per day by 1,440 (the number of minutes in a day).*

3 *RDI/I (10.5 + 1.38 = 11.88 ac at 600 gpad).*

Source: Kennedy/Jenks Consultants, *Teal Club Development Infrastructure Review – Evaluation of Wastewater Facilities*, May 2007.

Overall, Alternative 2 would result in reduced wastewater generation and demand compared to the proposed Project and would not require additional wastewater conveyance or treatment capacity beyond what would otherwise be planned and evaluated through standard City review and permitting processes. Therefore, impacts related to wastewater under Alternative 2 would similar or reduced compared to the proposed Project, which would also be less than significant.

5 City of Oxnard. "Chapter 6, Water Supply Characterization." In *2020 Urban Water Management Plan*. October 2021. p. 6-14. Accessed January 2025. https://www.oxnard.gov/public-works/water/water-quality-reports.

Dry Utilities (Electricity, Natural Gas, and Telecommunications)

Development of Alternative 2 would generate electricity, natural gas, and telecommunications demand associated with buildout of up to 126 residential units and approximately 60,000 square feet of commercial space under the Project Site's existing General Plan land use designations. Compared to the proposed Project, Alternative 2 would result in a substantially lower residential population and reduced overall intensity of development, which would correspondingly reduce demand for dry utility services. As discussed above, the estimated electricity demand for Alternative 2 is approximately 2.8 million kWh (2.8 GWh) per year, compared to the approximately 5.8 million kWh (5.8 GWh) per year for the proposed Project.

Similar to the proposed Project, no natural gas is anticipated to be used for construction of Alternative 2, and as such, Alternative 2 would not require the relocation, expansion, or construction of new natural gas facilities. During operation, natural gas service under Alternative 2 would be provided by SoCalGas. Natural gas demand would be generated by residential and commercial uses and would be lower than the proposed Project due to the reduced residential buildout. As discussed above, the estimated natural gas consumption for Alternative 2 is approximately 5.9 million kBTU (5.8 MMcf) compared to the 17.5 million kBTU (17.4 MMcf) per year for the proposed Project.

With respect to telecommunication services, demand for services under Alternative 2 would be similar in type but reduced in scale in comparison to the proposed Project due to the lower development intensity.

Similar to the proposed Project, Alternative 2 would require submission, review, and approval of utility plans through City and applicable utility providers to ensure that electricity, natural gas, and telecommunications demands could be adequately served. Therefore, impacts related to dry utilities under Alternative 2 would be similar or less than compared to the proposed Project, which would also be less than significant.

Solid Waste

With Alternative 2, development of the Project Site would include approximately 126 residential dwelling units, approximately 60,000 square feet of commercial uses, and 34 acres of parks and open space. Solid waste generation under Alternative 2 would be associated primarily with residential and commercial development. As shown in **Table 6.0-16: Projected Solid Waste Generation for Alternative 2**, the development that would occur pursuant to Alternative 2 would generate approximately 5.59 tons per day or 2,040 tons per year. Compared to the proposed Project which would generate 4 tons per day or 1,460 tons of solid waste per year, Alternative 2 would result in an overall increase in solid waste generation due to the increased commercial and open space uses.

Solid waste generated by Alternative 2 would be collected and disposed of in accordance with applicable requirements and would be served by the Del Norte Regional Recycling and Transfer

Station, which has a permitted capacity of 2,779 tons per day.[6] The Toland Road Landfill would also serve the Project Site, and has a permitted capacity of 2,864 tons per day. The Simi Valley Landfill has a permitted capacity of 9,250 tons of solid waste per day.[7,8] Although Alternative 2 would generate incrementally greater solid waste compared to the proposed Project due to the increased commercial space and open space, available landfill capacity is sufficient to accommodate solid waste generated by Alternative 2. Alternative 2 would not generate solid waste in excess of State or local standards, and solid waste impacts would remain less then significant, similar to the proposed Project. Although Alternative 2 would result in incrementally greater solid waste impacts than the proposed Project, neither Alternative 2 or the Project would result in significant solid waste impacts.

TABLE 6.0-16: PROJECTED SOLID WASTE GENERATION FOR ALTERNATIVE 2

Type of Use	Unit	Quantity	Waste Generation Rates (lb./unit/day)
Residential	Du.	126	4/du/day
Commercial	Sq. ft.	60,000	5/1000 sq. ft./ day
Open Space	acres	34	.007 lbs./sq. ft./day
Total Daily Estimate			**11,171 lbs./day (5.59 tons per day)**

Note: du=dwelling unit; sq ft= square feet

[a] *CalRecycle, Estimated Solid Waste Generation R*

Therefore, impacts related to utilities and services systems under Alternative 2 would be similar to or reduced than those associated with the proposed Project, and impacts would remain less than significant.

6.6.3 Summary of Comparative Impacts

A summary comparison of impacts associated with the Project Alternatives is provided in **Table 6.0-31**, Comparison of Alternatives to Project. Due to the substantial reduction in residential development, Alternative 2 would substantially lessen significant air quality impacts compared to the proposed Project to a less than significant level. Alternative 2 would also incrementally reduce impacts related to aesthetics and urban design, energy, GHG, and population and housing; however, these impacts would remain less than significant, consistent with the proposed Project.

Impacts to agricultural resources would remain significant and unavoidable under Alternative 2, similar to the proposed Project. For the remaining environmental topics, including biological

6 CalRecycle. "SWIS Facility/Site Activity Details. Del Norte Regional Recycling and Transfer." Accessed October 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/622?siteID=3967.

7 CalRecycle. "SWIS Facility/Site Activity Details. Toland Road Landfill." Accessed October 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/606?siteID=3952.

8 CalRecycle. "SWIS Facility/Site Activity Details. Simi Valley Landfill." Accessed October 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/608?siteID=3954

resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, public services and recreation, transportation and circulation, tribal cultural resources, and utilities and service systems, Alternative 2 would result in impacts similar to those identified for the proposed Project.

6.6.4 Relationship to Project Objectives

Alternative 2 would partially meet the objective of implementing General Plan Policy CD-7.1 by developing a walkable, infill urban village at the Project Site (Objective 1). Alternative 2 would include residential development, neighborhood-serving commercial uses, parks and open space, internal streets, sidewalks, and a multi-use path, which would support walkability and multiple circulation options. However, because Alternative 2 would provide a substantially reduced number of residential units and a more limited mix of housing types compared to the proposed Project, it would not fully achieve the intensity or diversity of development envisioned by this objective.

Alternative 2 would meet the objective of providing neighborhood-serving commercial uses to meet the daily needs of residents and generate retail sales tax revenue for the City (Objective 2). Commercial development would occur in areas designated for such uses under the existing General Plan and zoning, providing opportunities for local services. However, the reduced residential population under Alternative 2 would limit the customer base for these uses, thereby partially limiting the effectiveness of this objective compared to the proposed Project.

Alternative 2 would meet the objective of enhancing existing parks and creating new park spaces (Objective 3). Alternative 2 would provide approximately 34 acres of parks and open space, including park and recreational areas within the Project Site, which is substantially greater than the approximately 11.27 acres of new parks and open space proposed under the Project. In this respect, Alternative 2 would more fully satisfy Objective 3 than the proposed Project.

Alternative 2 would not meet the objective of maximizing residential development potential of the site within the parameters of available water allocation, the NECSP, and the General Plan to provide much-needed housing (Objective 4). By substantially reducing the number of residential units compared to the proposed Project, Alternative 2 would not fully utilize the residential development capacity of the Project Site or provide the level of housing production anticipated by this objective.

Alternative 2 would not fully meet the objective of providing ample opportunities for low-income and workforce housing (Objective 5). While residential development would occur under Alternative 2, the reduced number of total dwelling units would limit the overall quantity of affordable units that could be provided, and Alternative 2 would not achieve the same scale of affordability commitments contemplated under the proposed Project.

Alternative 2 would partially meet the objective of creating a neighborhood aligned with the City's Vision for a More Livable Community (Objective 6). Alternative 2 would incorporate parks and open

space, pedestrian and bicycle facilities, and development that is compatible with surrounding uses. However, the reduced density, more limited mix of housing types, and less robust urban form would not fully realize the human-scaled, active, and cohesive neighborhood environment envisioned by this objective.

Alternative 2 would partially meet the objective of ensuring high-quality, aesthetically pleasing development consistent with the community's vision (Objective 7). Development under Alternative 2 would be subject to existing zoning standards and City design requirements, which would ensure an acceptable level of architectural quality. However, Alternative 2 would not implement the comprehensive, project-specific architectural and design standards proposed under the Project because Alternative 2 would not include adoption of the Sub-Neighborhood Plan, which establishes the form-based development standards and design guidelines intended to create a unified and distinctive community character across the Project Site.

Overall, Alternative 2 would partially meet several of the Project objectives, particularly those related to park provision and general land use compatibility. However, Alternative 2 would not fully meet key objectives related to maximizing housing production, providing affordable housing opportunities, and creating a compact, mixed-use urban village consistent with the City's long-term vision for growth at the Project Site under the City's General Plan and NECSP.

6.7 ALTERNATIVE 3 – PHASE I ONLY

6.7.1 Alternative Description

Alternative 3 evaluates the environmental impacts that would result from development of Phase I of the proposed Project. Phase I would include development only within Area A of the Project Site, while Area C would remain in its existing condition. Alternative 3 allows for a range of residential densities, as illustrated in **Figure 6.0-2: Alternative 3 Unit Allocation Plan**. However, for purposes of a conservative analysis, the maximum development scenario shown in **Figure 6.0-3: Alternative Maximum Development Scenario** is used to evaluate the greatest potential environmental impacts associated with this alternative.



Master Lot numbers are shown in red.

0 50 100 200

APPROXIMATE SCALE IN FEET

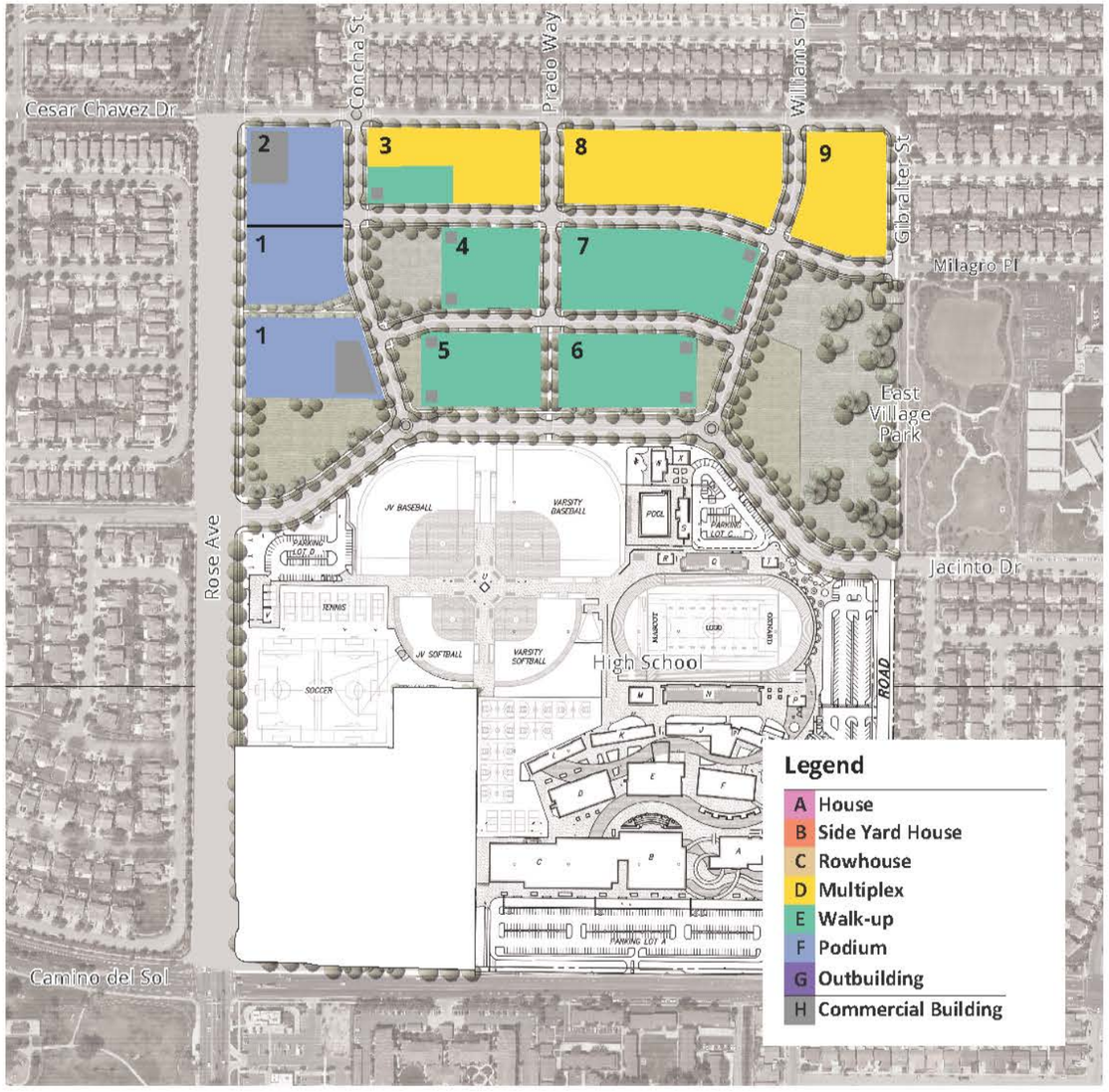
SOURCE: Sargent Town Planning – 2025

FIGURE **6.0-2**

Meridian Consultants

Alternative 3 Unit Allocation Plan

408-001-24



Units by Lot

Building Type	Code	Density [3]	Lot 1 (3.53 acres) Mix	Lot 1 Area	Lot 1 Units	Lot 2 (1.74 acres) Mix	Lot 2 Area	Lot 2 Units	Lot 3 (2.4 acres) Mix	Lot 3 Area	Lot 3 Units	Lot 4 (1.47 acres) Mix	Lot 4 Area	Lot 4 Units	Lot 5 (1.64 acres) Mix	Lot 5 Area	Lot 5 Units	Lot 6 (1.89 acres) Mix	Lot 6 Area	Lot 6 Units
A House	§2.6.3	6 to 10																		
B Side Yard House	§2.6.4	10 to 13																		
C Rowhouse	§2.6.5	16 to 24																		
D Multiplex	§2.6.6	20 to 35							70%	1.68	48									
E Walk-up	§2.6.7	30 to 40							30%	0.72	24	100%	1.47	49	100%	1.64	55	100%	1.89	64
F Podium	§2.6.8	30 to 45	100%	3.53	134	100%	1.74	66												
G Outbuilding	§2.6.10	1 per house		N/A			N/A			N/A			N/A			N/A			N/A	
TOTAL DWELLINGS:					134			66			72			49			55			64
H Commercial Building (SF)	§2.6.9	.3 to .4 FAR	*Note 1*		8,000	*Note 1*		20,000	*Note 4*		1,000	*Note 4*		2,000	*Note 4*		2,000	*Note 4*		2,000
TOTAL COMMERCIAL:					8,000			20,000			1000			2000			2000			2000

(Cont.)

Building Type	Code	Density [3]	Lot 7 (2.83 acres) Mix	Lot 7 Area	Lot 7 Units	Lot 8 (3.18 acres) Mix	Lot 8 Area	Lot 8 Units	Lot 9 (1.85 acres) Mix	Lot 9 Area	Lot 9 Units	TOTAL (20.52 acres) Mix	TOTAL Area	TOTAL Units
A House	§2.6.3	6 to 10												
B Side Yard House	§2.6.4	10 to 13												
C Rowhouse	§2.6.5	16 to 24												
D Multiplex	§2.6.6	20 to 35				100%	3.18	76	100%	1.85	44	33.6%	6.70	168
E Walk-up	§2.6.7	30 to 40	100%	2.83	96							57.6%	8.55	288
F Podium	§2.6.8	30 to 45										40.0%	5.27	200
G Outbuilding	§2.6.10	1 per house		N/A			N/A			N/A			N/A	
TOTAL DWELLINGS:					96			76			44		DU:	656
H Commercial Building (SF)	§2.6.9	.3 to .4 FAR	*Note 4*		2,000									
TOTAL COMMERCIAL:					2000			0			0		Comm. SF:	37,000

Notes:

1. In this scenario, commercial space is included within a mixed use podium project spanning Lots 1 and 2.
2. Lot numbers are in black in the Illustrative Plan.
3. Density is expressed in dwelling units per acre (dua) unless otherwise noted. As the shape and size of each Lot differs, each Lot achieves a slightly different density within this range.
4. Corner commercial (1,000 SF each) by open spaces; may be located within a residential building.

SOURCE: Sargent Town Planning – 2026

FIGURE **6.0-3**

Meridian Consultants

Alternative 3 Maximum Development Scenario

408-001-24

Alternative 3 would accommodate up to 656 residential dwelling units, 37,000 square feet of commercial space, and approximately 10.27 acres of parks and open space. As shown in **Table 6.0-17: Comparison of the Proposed Project to Alternative 3**, this represents a reduction of 294 residential dwelling units, 3,000 square feet of commercial space, and one acre of parks and open space compared to the proposed Project.

TABLE 6.0-17: COMPARISON OF THE PROPOSED PROJECT TO ALTERNATIVE 3

Characteristics	Proposed Project	Alternative 3: Phase I Only	Development Comparison
Residential (dwelling units)	950	656	-294
Commercial (square feet)	40,000	37,000	-3,000
Parks and Open Space (acres)	11.27	10.27	-1

6.7.2 Comparative Impact Evaluation

Aesthetics and Urban Design

The City's 2030 General Plan identifies beaches, coastlines, waterways, agricultural greenbelts, view corridors, and urban landscapes with historic park or plaza features as key scenic resources. Scenic views from the Project Site are limited to partially obstructed views of the distant Coastal Mountain Range. Due to the Project Site's urban setting, distance from the coast, and intervening development, there are no views of coastlines, waterways, or agricultural greenbelts from the site.

Alternative 3 would reduce overall development intensity compared to the proposed Project because Area C would remain undeveloped. However, the majority of the development that would be allowed by the proposed Sub-Neighborhood Plan, including the tallest buildings, would occur within Area A under both scenarios. Similar to the proposed Project, development under Alternative 3 would have a limited effect on scenic vistas and visual resources, as existing urban development already constrains distant views from nearby public vantage points.

Alternative 3 would not include development within Area C, which contains the Maulhardt family residence, barn, associated outbuildings, and a fallowed lemon orchard. As documented in the Structural Report (**Appendix K**), the barn and residence are in a deteriorated condition and have been determined to be structurally unsafe. The fallowed orchard and existing structures contribute to the current visual condition of Area C and do not reflect the City's goals for high-quality urban development.

Under Alternative 3, Area C would remain in its existing condition, and visual conditions in this area would not change substantially from existing conditions. Although the continued presence of deteriorated structures and fallowed agricultural land would not enhance the visual character of the

site, it would also not result in new or more severe aesthetic impacts. Therefore, impacts to scenic vistas and visual character under Alternative 3 would be less than significant.

Area A does not contain designated scenic resources and is not located along a State-designated scenic highway. Development under Alternative 3 would comply with the NECSP and applicable City design and scenic quality standards, including building height limits, setbacks, and landscaped buffers along Rose Avenue intended to maintain visual openness and neighborhood compatibility. Because Alternative 3 would result in development with a similar height, scale, and overall design character as the proposed Project, but at a reduced overall intensity, it would not conflict with applicable zoning or scenic quality regulations.

Overall, Alternative 3 would result in aesthetic and urban design impacts that are similar to those of the proposed Project. Because development under Alternative 3 would introduce buildings with a similar height, scale, and visual character as the proposed Project, impacts would remain less than significant. Therefore, impacts related to aesthetics and urban design under Alternative 3 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Agricultural Resources

As shown in **Figure 4.2-1: Important Farmland Categories**, Area A contains Prime Farmland and Area C has Prime Farmland and Farmland of Statewide Importance. In comparison to the proposed Project, Alternative 3 would reduce the amount of farmland converted because Alternative 3 would not convert the farmland located in Area C. Alternative 3 would implement **MM AG-1**, which requires either salvaging and relocating the upper 12 inches of topsoil for reuse on lower-quality agricultural lands with protection through an agricultural conservation easement, or payment of agricultural conversion in-lieu fees, would lessen the severity of the impact of Alternative 3, but would not avoid the permanent conversion of farmland. Therefore, impacts to agricultural resources under Alternative 3 would remain significant and unavoidable.

Overall, Alternative 3 would result in similar agricultural resource impacts when compared to the proposed Project, as both would convert Prime Farmland within Area A to urban uses. Thus, under both Alternative 3 and the proposed Project, impacts to agricultural resources would remain significant and unavoidable even with implementation of **MM AG-1**. Therefore, Alternative 3 would not avoid or substantially lessen significant agricultural resource impacts when compared to the proposed Project.

Air Quality

Construction activities for both Alternative 3 and the Project would produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, loose dirt from paved site access roadways, and motor vehicles transporting the construction crew. Exhaust emissions from construction activities on-site would vary daily as

construction activity levels change. Grading activities produce fugitive dust emissions (PM10 and PM2.5) from soil-disturbing activities. As discussed in **Section 4.3: Air Quality**, construction emissions associated with the proposed Project would exceed VCAPCD emission thresholds without the implementation of mitigation measures. **MM AQ-1,** which includes the use of construction equipment that meets the U.S. EPA Tier 4 final standards, would be implemented to reduce air quality emissions during construction activities. Alternative 3 would reduce the residential development intensity, increase commercial buildout, and increase open space and parks. The estimated construction emissions based on the proposed uses for Alternative 3 are shown in **Table 6.0-18: Alternative 3 Maximum Construction Emissions without Mitigation**. As shown, construction emissions would exceed VCAPCD thresholds without the implementation of mitigation measures.

TABLE 6.0-18: ALTERNATIVE 3 MAXIMUM CONSTRUCTION EMISSIONS WITHOUT MITIGATION

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
2027	3.1	34.4	40.4	0.1	7.4	2.6
2028	2.9	13.5	38.8	<0.1	7.3	2.0
2029	2.8	13.0	37.1	<0.1	7.3	1.9
2030	2.5	12.4	35.7	<0.1	7.3	1.9
2031	24.0	11.9	34.1	<0.1	7.3	1.9
2032	3.1	34.4	40.4	0.1	7.4	2.6
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	No	**Yes**	No	No	No	No
Alternative 3 Maximum	**24.0**	**34.4**	**40.4**	**0.1**	**7.4**	**2.6**
Proposed Project Maximum	**24.0**	**34.4**	**40.4**	**0.1**	**7.4**	**2.6**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian. Alternative 3 Air Quality, Greenhouse Gas and Energy Emissions. See **Appendix U**.

Similar to the proposed Project, **MM AQ-1** would be implemented to reduce air quality emissions during construction activities. **MM AQ-1** would ensure that construction equipment used during construction of the project shall meet the U.S. EPA Tier 4 final standards, which would reduce construction emissions to less than significant levels. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, the equipment shall, at a minimum, meet the Tier 3 standards. Zero-emissions construction equipment may be incorporated in lieu of Tier 4 final equipment. A copy of each equipment's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each piece of equipment. As shown in **Table 6.0-19: Alternative 3 Maximum Construction Emissions with Mitigation**, air quality emission would not exceed 25 pounds per day for VOC and NO_x with the implementation of **MM AQ-1**. With implementation of this mitigation measure, construction of the proposed Project would not violate any federal or State air quality standard or

contribute substantially to an existing or projected air quality standard violation, resulting in less than significant construction emissions with mitigation incorporated.

TABLE 6.0-19: ALTERNATIVE 3 MAXIMUM CONSTRUCTION EMISSIONS WITH MITIGATION

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Area A						
2027	2.4	13.5	42.4	0.1	7.1	1.8
2028	2.3	7.6	40.8	<0.1	7.1	1.8
2029	2.3	7.4	39.1	<0.1	7.1	1.8
2030	2.0	7.5	37.7	<0.1	7.1	1.8
2031	23.7	6.4	36.1	<0.1	7.1	1.8
2032	23.7	3.3	15.7	<0.1	1.5	0.4
Alternative 2 Maximum	**23.7**	**13.5**	**42.4**			
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Threshold exceeded?	No	No	No	No	No	No
Proposed Project Maximum	**23.7**	**13.5**	**42.4**	**0.1**	**7.1**	**1.8**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian. Alternative 3 Air Quality, Greenhouse Gas and Energy Emissions. See **Appendix U**.

As with the proposed Project, operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities associated with the uses under Alternative 3. Source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. As discussed in **Section 4.3: Air Quality**, the proposed Project operational emissions would exceed VCAPCD thresholds and would contribute to an existing federal or State air quality standard violation and this would be a significant impact. The estimated operational emissions based on the proposed uses for Alternative 3 are shown in **Table 6.0-20: Alternative 3 Maximum Daily Operational Emissions**. Because Alternative 3 would not exceed VCAPCD mass daily emissions thresholds, operational air quality impacts would be less than significant and therefore comparatively less than the significant and unavoidable impacts associated with the proposed Project.

TABLE 6.0-20: ALTERNATIVE 3 MAXIMUM DAILY OPERATIONAL EMISSIONS

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Mobile	1.9	1.0	10.1	<0.1	2.9	0.8
Area	20.4	0.4	393.	<0.1	<0.1	<0.1
Energy	0.2	3.1	1.3	<0.1	0.2	0.2

TABLE 6.0-20: ALTERNATIVE 3 MAXIMUM DAILY OPERATIONAL EMISSIONS						
Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds/day					
Total (Areas A)	**22.5**	**4.5**	**51.1**	**<0.1**	**3.2**	**1.0**
Total Del Sol High School Emissions (Area B)	13.8	22.8	68.1	0.2	22.2	6.1
VCAPCD Mass Daily Threshold	*25*	*25*	—	—	—	—
Alternative 3 Total Emissions (Areas A and B)	**36.3**	**27.3**	**119.2**	**0.2**	**25.4**	**7.1**
Threshold exceeded?	No	No	No	No	No	No
Proposed Project Total Emissions (Areas A, B, and C)	**45.5**	**29.0**	**139.3**	**0.3**	**26.2**	**7.4**

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NO_x = nitrogen oxides; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SO_x = sulfur oxides; VOC = volatile organic compounds.

Source: Meridian. Alternative 3 Air Quality, Greenhouse Gas and Energy Emissions. See **Appendix U**.

Biological Resources

Development under Alternative 3 would occur within Area A, which contains disturbed land, fallow agricultural land, coyote brush scrub, and developed areas similar to those analyzed for the proposed Project. As discussed in **Section 4.4: Biological Resources**, these areas provide potential habitat for special-status wildlife species, including nesting migratory birds, burrowing owl, and other special-status species that may use the site for foraging or shelter.

Construction activities under Alternative 3 would involve grading, vegetation removal, and other ground-disturbing activities that could result in direct mortality, nest abandonment, or disturbance of special-status species in the absence of mitigation. Alternative 3 would therefore be required to implement the same biological resources mitigation measures identified for the proposed Project. **MM BIO-1** requires pre-construction surveys for nesting migratory birds and raptors, establishment of species-appropriate avoidance buffers around active nests, and monitoring by a qualified biologist to ensure compliance with the Migratory Bird Treaty Act and California Fish and Game Code. This measure would avoid direct impacts to nesting birds and reduce impacts to less than significant. **MM BIO-2** requires focused pre-construction surveys, implementation of avoidance buffers around occupied burrows, and, where avoidance is not feasible, passive relocation and exclusion under the supervision of a qualified biologist in coordination with the California Department of Fish and Wildlife. This measure would prevent direct mortality and disturbance of burrowing owls and reduce impacts to less than significant. Because Area C would not be developed, this alternative would avoid removal of the structures that provide habitat to roosting bats. Therefore, Alternative 3 would not require implementation of **MM BIO-3**, which would require the pre-construction survey of roosting bats. With implementation of **MM BIO-1** and **MM BIO-2**, construction-related impacts to

special-status wildlife species and nesting birds under Alternative 3 would be reduced to less than significant.

The Project Site does not contain riparian habitat, wetlands, or other sensitive natural communities regulated by federal, State, or local agencies, and Alternative 3 would not result in impacts to such resources. In addition, the Project Site is located within an urbanized area and does not function as a regional wildlife corridor. Therefore, Alternative 3 would not interfere with wildlife movement or established wildlife corridors.

Overall, Alternative 3 would incrementally reduce biological resource impacts by not developing in Area C. Therefore, impacts related to biological resources under Alternative 3 would be similar to or slightly less than those associated with the proposed Project, and impacts would remain less than significant with mitigation incorporated.

Cultural Resources

As discussed in **Section 4.5: Cultural Resources**, the Project Site contains historical resources associated with the Maulhardt family's agricultural operations, including the main residence, barn, garage/living quarters, and associated ranch buildings that are eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and/or as City Landmarks. Under Alternative 3, development would be limited to Area A, while Area C, where the primary historic ranch buildings are located, would remain in its existing condition.

Because Alternative 3 would not involve development in Area C, it would not require demolition, relocation, or alteration of the identified historic structures associated with the Maulhardt Ranch. As a result, Alternative 3 would avoid direct impacts to historical resources that would otherwise occur under the proposed Project and Alternative 2. Therefore, significant impacts to historic resources would not occur under Alternative 3, and implementation of **MM CUL-1** would not be required.

Development under Alternative 3 would involve grading and other ground-disturbing activities within Area A, which has the potential to contain previously unidentified subsurface archaeological resources. Accordingly, Alternative 3 would require implementation of **MM CUL-2**.

Overall, Alternative 3 would avoid impacts to historic resources compared to the proposed Project that would have significant and unavoidable impacts to historic resources. With implementation of **MM CUL-1**, impacts to archaeological resources under Alternative 3 would be less than significant. Therefore, Alternative 3 would avoid substantially lessen cultural (historical) resource impacts when compared to the proposed Project.

Energy

Alternative 3 would reduce the residential, commercial and open space intensity, which would result in a reduced demand for electricity and transportation fuels during construction, and a reduced

demand for electricity, natural gas, and transportation fuels during operation. **Table 6.0-21: Summary of Fuel Use During Construction of Alternative 3** summarizes the quantity of petroleum fuels that would be consumed during construction. As shown in **Table 6.0-21**, 331,074 gallons of fuel would be used during construction, which is less than the 786,731 gallons of fuel that would be used under the proposed Project. Additionally, approximately 4,799 kWh of electricity would be used during construction for water conveyance for dust control, and on limited basis, may be used to power lighting, which would be the same compared to the proposed Project.

TABLE 6.0-21: SUMMARY OF FUEL USE DURING CONSTRUCTION OF ALTERNATIVE 3

Fuel Type	Quantity
Area A	
Off-Road Construction Equipment	108,650 gallons
Construction Worker	39,869 gallons
Construction Vendor (MDH & HHD Trucks)	125,034 gallons
Construction Hauling	57,521 gallons
Total	**331,074 gallons**

Source: Meridian. Alternative 3 Air Quality, Greenhouse Gas and Energy Emissions. See **Appendix U**.

All construction equipment and vehicles would comply with CARB regulations, including anti-idling limits and the use of fuel-efficient engines. Construction activities would represent a short-term and temporary demand for energy and would not require unusual or energy-intensive equipment or practices. Construction of the proposed Project would require the use of various forms of energy. Therefore, construction energy consumption under Alternative 3 would not be wasteful, inefficient, or unnecessary, resulting in less than significant impacts.

During operation, energy consumption under Alternative 3 would be reduced compared to the proposed Project due to the reduced development intensity. Energy consumption in support of, or related to Alternative 3 operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project Site) and facilities energy demands (energy consumed by building operations and site maintenance activities). Operations-related fuel consumption was calculated using the annual VMT from the air quality and greenhouse gas analyses' CalEEMod output, and using information generated from CARB's 2021 EMFAC model. **Table 6.0-22: Alternative 3 Estimated Vehicle Operations Fuel Consumption** shows that an estimated 263,677 gallons of gasoline and 44,482 gallons of diesel fuel would be consumed per year for the operation of buildout that would result from the development of Alternative 3, which would be less than the 273,372 gallons of gasoline and 46,117 gallons of diesel fuel that would be consumed under the proposed Project.

TABLE 6.0-22: ALTERNATIVE 3 ESTIMATED VEHICLE OPERATIONS FUEL CONSUMPTION

Land Use	Annual VMT	Gasoline Usage (gallons)	Diesel Usage (gallons)
Del Sol High School	8,127,222	229,411	38,701
Apartment Low Rise	667,562	18,844	3,179
Retail	546,366	15,423	2,602
Alternative 3 Total	**9,341,150**	**263,677**	**44,482**
Proposed Project Total	**9,684,632**	**273,372**	**46,117**

Source: Meridian. Alternative 3 Air Quality, Greenhouse Gas and Energy Emissions. See **Appendix U**.

The annual natural gas and electricity demands are contained in the CalEEMod output are provided in **Table 6.0-23: Alternative 3 Annual Operational Energy Demand Summary**. As shown, the estimated electricity demand for Alternative 3 is approximately 5.1 million kWh (5.1 GWh) per year, compared to the approximately 5.8 million kWh (5.8 GWh) per year for the proposed Project. The estimated natural gas consumption for Alternative 3 is approximately 15.5 million kBTU (15.2 MMcf) compared to the 17.5 million kBTU (17.5 MMcf) per year for the proposed Project.

TABLE 6.0-23: ALTERNATIVE 3 ANNUAL OPERATIONAL ENERGY DEMAND SUMMARY

Land Use	Electricity (kWh/yr)	Water Usage		Water-Related Electricity Use (kWh/yr)	Total Annual Electricity Use (kWhr)	Total Annual Natural Gas Use (kBTU/yr)
		Indoor (gal/yr)	Outdoor (gal/yr)			
Del Sol High School	1,710,370	11,440,596	28,580,043	229,522	1,939,892	3,330,720
Apartment Low Rise	2,570,452	24,864,647	1,098,692	175083	2,745,535	11,920,698
Retail	361,501	2,740,683	47,862	18910	380,411	221,253
Park	0	0	0	0	0	0
Alternative 3 Total	**4,642,323**	**39,045,926**	**29,726,597**	**426,515**	**5,065,838**	**15,472,671**
Proposed Project Total	**5,823,635**	**50,411,751**	**30,222,847**	**503,515**	**6,327,150**	**17,502,396**

Notes: kWh/yr = kilowatt-hours per year; kBtu/yr = thousand British Thermal Units per year

Source: Meridian. Alternative 3 Air Quality, Greenhouse Gas and Energy Emissions. See **Appendix U**.

Alternative 3 would also comply with the latest Title 24 Building Energy Efficiency Standards, the CALGreen Code, and City design and sustainability requirements detailed in **Section 4.6: Energy**, ensuring efficient building energy performance and reduced reliance on fossil fuels.

Alternative 3 would also be consistent with applicable State and local energy plans, including the California Building Standards Code, the SCAG Connect SoCal Plan, and the City's CAAP detailed in

Section 4.6: Energy, which collectively promote energy efficiency, renewable energy generation, and reduced vehicle miles traveled.

Overall, Alternative 3 would result in reduced energy consumption during both construction and operation compared to the proposed Project due to its smaller scale and reduced development footprint. Alternative 3 would not result in the wasteful, inefficient, or unnecessary use of energy resources and would remain consistent with applicable State and local plans for renewable energy and energy efficiency. Therefore, impacts related to energy under Alternative 3 would be less than those associated with the proposed Project, and impacts would remain less than significant.

Geology and Soils

As detailed in **Section 4.7: Geology and Soils**, the Project Site is located in a seismically active region of Southern California and is subject to geologic conditions including strong seismic ground shaking, liquefaction, settlement, expansive soils, and the potential presence of paleontological resources. These conditions are inherent to the Project Site and would apply regardless of development intensity. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and no known active faults traverse the site; therefore, Alternative 3 would not expose people or structures to surface fault rupture. However, structures developed under Alternative 3 would remain subject to strong seismic ground shaking and could be affected by liquefaction, settlement, and expansive soil conditions without appropriate design measures.

As with the proposed Project, **MM GEO-1** would be implemented to address potential impacts related to seismic ground shaking, liquefaction, settlement, expansive soils, and slope stability through appropriate foundation design, ground improvement measures, and compliance with applicable building codes, thereby reducing geology and soils impacts to less than significant levels. Additionally, **MM GEO-2** would be implemented to evaluate, document, and treat any unanticipated discoveries of any paleontological resources found during construction. This measure would ensure that paleontological resources are properly identified and preserved or documented, reducing impacts to paleontological resources to less than significant levels. With implementation of **MM GEO-1** and **MM GEO-2**, impacts related to geology, soils, and paleontological resources with Alternative 3 would be reduced to less than significant, similar to the proposed Project.

Although Alternative 3 would reduce overall development intensity compared to the proposed Project, it would not change the underlying geologic conditions of the Project Site and would involve similar types of grading and construction activities within Area A. Therefore, impacts related to geology and soils under Alternative 3 would be similar to than those associated with the proposed Project, and impacts would remain less than significant with mitigation incorporated.

Greenhouse Gas Emissions

Construction activities for both Alternative 3 and the Project would produce combustion GHG emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling

materials to and from the site, loose dirt from paved site access roadways, and motor vehicles transporting the construction crew. Exhaust emissions from construction activities on-site would vary daily as construction activity levels change. The estimated construction emissions under Alternative 3 are shown in **Table 6.0-24: Alternative 3 Construction GHG Emissions.** As shown, construction GHG emissions would be lower compared to the proposed Project by approximately 1,078 $MTCO_2e$.

TABLE 6.0-24: ALTERNATIVE 3 CONSTRUCTION GHG EMISSIONS

Construction Phase	$MTCO_2e$/Year
2027	1,517
2028	1,267
029	1,244
2030	1,224
2031	1,139
2032	135
Alternative 3 Total Construction Emissions	**6,526**
30-Year Annual Amortized Rate	**218**
Proposed Project Total Construction Emissions	**7,604**

Notes: GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: Meridian. Alternative 3 Air Quality, Greenhouse Gas and Energy Emissions. See **Appendix U**.

Alternative 3 would generate GHG emissions from use of the buildings and related activities (e.g., landscape maintenance). Similar to the Project, operational GHG emissions generated by both stationary and mobile sources would result from normal day-to-day activities associated with the uses under Alternative 3. Under this Alternative there would be a reduction in development of residential, commercial, and open space and parks compared to the Project, which would result in a reduction in demand for electricity, natural gas and transportation during operation. The estimated operational emissions under Alternative 3 are shown in **Table 6.0-25: Alternative 3 Operational GHG Emissions.** As shown, operational GHG emissions would be lower compared to the proposed Project by approximately 811 $MTCO_2e$.

TABLE 6.0-25: ALTERNATIVE 3 OPERATIONAL GHG EMISSIONS

Source	Alternative 3 $MTCO_2e$ per year[a]	Proposed Project $MTCO_2e$ per year[a]	Difference
Construction (amortized)	218	254	36
Mobile	380	475	95
Area	9	12	3
Energy	1,356	1,928	572
Water	85	119	34

TABLE 6.0-25: ALTERNATIVE 3 OPERATIONAL GHG EMISSIONS			
Source	Alternative 3 $MTCO_2e$ per year[a]	Proposed Project $MTCO_2e$ per year[a]	Difference
Waste	164	233	69
Refrigerants	1	1	0
Total	**2,212**	**3,023**	**811**

Notes: $MTCO_2e$ = metric tons of carbon dioxide emissions.

Source: Meridian. Alternative 3 Air Quality, Greenhouse Gas and Energy Emissions. See **Appendix U**.

This Alternative would be required to adhere to regulatory compliance measures designed to reduce GHG emissions such as the as the City's General Plan, CALGreen Building Codes, Title 24 requirements and the City's CAAP as detailed in **Section 4.8: Greenhouse Gas Emissions**. Additionally, this alternative would not conflict with applicable plans including CARB's Climate Change Scoping Plan or SCAG's 2020-2045 RTP/SCS as Alternative 3 is a reduction of the proposed Project. As such, this alternative would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Alternative 3 would result in reduced impacts to GHG compared to the proposed Project. Therefore, impacts related to GHG under Alternative 3 would be less than those associated with the proposed Project, and impacts would remain less than significant.

Hazards and Hazardous Materials

As detailed in **Section 4.9: Hazards and Hazardous Materials**, the Project Site was historically used for agricultural operations, and soil sampling identified residual OCPs, including DDT, DDE, DDD, and toxaphene, at concentrations consistent with historical agricultural use. Detected concentrations were below or only slightly above DTSC residential screening levels, and associated cancer risk estimates were within or near the lower end of the U.S. EPA's acceptable target risk range. Arsenic concentrations were consistent with natural background levels for Southern California soils. A DTSC-approved risk assessment concluded that no further action would be required to support residential development at the Project Site.

Under Alternative 3, development within Areas A would involve grading, excavation, and construction activities similar to those evaluated for the proposed Project. Construction activities would involve the limited use of common hazardous materials, such as fuels, solvents, and paints. These materials would be stored, handled, and disposed of in accordance with applicable federal, State, and local regulations, including the RCRA, the California HWCA, and oversight by the City's CUPA through the Oxnard Fire Department. Compliance with these requirements would minimize the potential for hazards related to the use, transport, or accidental release of hazardous materials, and any spills or leaks would be addressed in accordance with applicable cleanup standards.

During operation, residential uses, neighborhood-serving commercial uses, and open space developed under Alternative 3 would involve the routine use of household cleaning products and landscaping materials typical of residential neighborhoods. These substances would be used and stored in compliance with manufacturer instructions and applicable regulations, resulting in less than significant impacts related to hazardous materials during operation.

The Project Site is not listed on the Cortese List pursuant to Government Code Section 65962.5, does not contain active oil or gas wells, and is not adjacent to known hazardous waste facilities. Accordingly, the potential for long-term exposure of residents or the environment to hazardous materials under Alternative 3 would be less than significant.

Del Sol High School is located immediately south of Area A, and Rio Rosales and Norman R. Brekke Elementary Schools are located within one-quarter mile of the Project Site. Because residual pesticide concentrations are below regulatory levels of concern and only small quantities of household chemicals would be used during operation, development under Alternative 3 would not result in hazardous materials releases that could adversely affect nearby schools.

The Project Site is not located within an airport land use plan area, near an active oil extraction area, or within a designated wildfire hazard area. Development under Alternative 3 would comply with City emergency response and access requirements and would not impair the implementation of, or physically interfere with, adopted emergency response or evacuation plans.

Overall, hazards and hazardous materials impacts under Alternative 2 would be similar to those of the proposed Project. Prior testing has confirmed that residual pesticide concentrations are below levels of concern and no remediation is required. Continued compliance with applicable federal, State, and local hazardous materials regulations would ensure that impacts remain less than significant. Therefore, impacts related to hazards and hazardous materials under Alternative 3 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Hydrology and Water Quality

As discussed in **Section 4.10: Hydrology and Water Quality**, the Project Site generally drains south toward the Rice Road Drain. Under the Rice Road Watershed Agreement between the City and the VCWPD, discharge from the Project Site is limited to a maximum allowable rate of 1 cfs/ac to prevent downstream flooding.

Similar to the proposed Project, development under Alternative 3 would increase impervious surface area and generate stormwater runoff that would be directed to the Rice Road Drain system. Construction activities under Alternative 3 could temporarily increase erosion, sedimentation, and pollutant discharges during storm events associated with grading and earthmoving activities. However, as with the proposed Project, development under Alternative 3 would be required to

prepare and implement a SWPPP in accordance with the State General Construction Permit. Implementation of construction best management practices would minimize construction-related runoff and sediment transport. Accordingly, construction-period impacts to hydrology and water quality under Alternative 3 would be less than significant.

During operation, stormwater runoff generated under Alternative 3 would be managed through on-site drainage and treatment measures designed in compliance with the City's MS4 Permit and an approved WQMP. These measures would be designed to control runoff rates, reduce pollutant loading, and maintain consistency with downstream drainage capacity. Similar to the proposed Project, development under Alternative 3 would not substantially alter existing drainage patterns, increase downstream flooding, or degrade water quality within the Rice Road Drain or receiving waters.

The Project Site is not located within a FEMA-designated 100-year floodplain, and development under Alternative 3 would not occur within a FEMA-designated flood hazard area or redirect flood flows in a manner that would increase on-site or off-site flood hazards. Therefore, flood-related impacts would be less than significant.

Overall, hydrology and water quality impacts under Alternative 3 would be similar to those of the proposed Project. Although development under Alternative 3 would occur across Area A, stormwater runoff would be managed through compliance with MS4 permit requirements, implementation of a SWPPP and WQMP, and adherence to applicable flood control standards. Therefore, impacts related to hydrology and water quality under Alternative 3 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Land Use and Planning

Alternative 3 would develop Area A in the same manner as the proposed Project. Similar to the proposed Project, Alternative 3 would adhere to the development regulations of the NECSP Sub-Neighborhood Plan, which allows for applicable General Plan land use and zoning amendments as required. In addition, Alternative 3 would continue to implement an urban village consistent with the Project Site's Urban Village Overlay.

Because Alternative 3 would adhere to the same land use policy framework, zoning approach, and specific plan standards as the proposed Project within Area A, it would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects, including policies from the City's General Plan EIR, NECSP, and SCAG's SoCal Connect. Accordingly, land use and planning impacts under Alternative 3 would be less than significant.

Overall, Alternative 3 would result in land use and planning impacts that are similar to those of the proposed Project. Therefore, impacts related to land use and planning under Alternative 3 would be

similar to than those associated with the proposed Project, and impacts would remain less than significant.

Mineral Resources

As shown in **Figure 4.12-1: Mineral Resources**, Area A is designated MRZ-2 and MRZ-4. The MRZ-2 portion of the Project Site is also identified within Mineral Sector C of the CGS Special Report 253, which contains regionally significant construction aggregate resources. However, the Project Site and surrounding uses have transitioned to urban development, including Del Sol High School within Area B and existing residential development in all surrounding directions. Therefore, the Project Site and nearby areas are no longer compatible with mineral resource extraction activities due to existing land use conflicts, limited accessibility, and permanent urban improvements. Furthermore, the City's General Plan and the NECSP designate the Project Site for residential, commercial, and park uses rather than mineral extraction.

Figure 4.12-2: Oil and Gas Fields and Wells, identifies that the Project Site is located within the Oxnard Oil Field. However, the CalGEM database confirms that no active or idle oil or gas wells exist within or adjacent to the Project Site. Thus, Alternative 3 would not affect oil or gas resources. Therefore, impacts related to mineral resources under Alternative 3 would be similar to than those associated with the proposed Project, and impacts would remain less than significant.

Noise

Both Alternative 3 and the Project would require earthmoving activities during construction and would involve the use of heavy equipment, such as air compressors, backhoes, generators, graders, pavers, rollers, and scrapers. However, under Alternative 3, construction and operational activities would be limited to Area A, which is bordered by existing residential neighborhoods, Del Sol High School, and roadways such as Rose Avenue, Cesar Chavez Drive, Gibralter Street, and Jacinto Drive.

As modeled in CalEEMod, the same representative equipment list was conservatively assumed for both scenarios because Alternative 3 would require similar grading, and building construction activities. However, both Alternative 3 and the proposed Project would utilize the same construction methods, equipment types, and phases during construction of Area A. The reduction in development intensity does not eliminate or modify the construction activities that generate the highest noise levels. As shown in **Table 6.0-26: Alternative 3 Construction Maximum Noise Estimates**, construction noise levels would exceed the 80 dBA (Leq, 8-hour) threshold by a maximum of 6.6 dBA at Site 1 during grading of Area A without the implementation of technically feasible noise reduction measures. Noise modeling was conducted using hourly equivalent sound levels (Leq,1-hour), which represent the loudest construction conditions during individual construction phases. These hourly noise levels were conservatively compared to the City's 80 dBA Leq,8-hour construction noise threshold, which represents the allowable average exposure over a typical workday.

TABLE 6.0-26: ALTERNATIVE 3 CONSTRUCTION MAXIMUM NOISE ESTIMATES

Site	Nearest Off-Site Building Structures	Calculated Noise Level (Leq,1hr) by Construction Phase					Significance Threshold	Increase above Significance Threshold
		Demolition	Grading	Building Construction	Paving	Architectural Coating		
1	Single-family residential uses along Milagro Place and Gibraltar Street	—	86.6	85.3	80.0	72.1	80	+6.6
2	Single-family residential uses along Festivo Street and Del Sol High School	—	65.7	64.3	59.1	51.1	80	+0.0
3	Multi-family residential uses along Camino Del Sol	—	58.3	56.9	51.7	43.8	80	+0.0
4	Single-family residential uses along Valentina Drive	—	65.7	64.4	59.1	51.2	80	+0.0
5	Single-family residential uses along Vivana Drive	—	75.1	73.8	68.6	60.6	80	+0.0
6	Single-family residential uses along Cesar Chavez Drive	—	84.1	82.8	77.5	69.6	80	+4.1
7	Del Sol High School	—	68.2	66.9	61.6	53.7	80	+0.0

Notes: No demolition is taking place during Phase A of construction as the site is vacant and undeveloped.

Source: FHWA, RCNM, version. 1.1. Meridian Consultants. *Noise Study*. **Appendix O.**

Similar to the proposed Project, Alternative 3 would implement **MM NOI-1,** which would include the retrofit of mobile equipment with optimal muffler systems capable of reducing construction noise levels by 10 dBA or more, in order to minimize temporary construction noise impacts on nearby sensitive receptors. Additionally, both this alternative and the proposed Project would comply with Section 7-188[0] of OCC by ensuring construction activities would occur during the hours 7:00 AM and 6:00 PM on weekdays or Saturdays only.

During operation, noise would be generated primarily from vehicular traffic associated with residential and commercial uses, building mechanical systems, and typical neighborhood activity.

Overall, the noise generated by the Project's land uses would be consistent with the ambient noise levels in the Project Site, which range from 55.0 to 68.9 dB(A). Therefore, operational noise impacts would be less than significant.

Groundborne vibration generated by construction equipment such as excavators and dozers. As described above, Alternative 3 would utilize the same general construction activities, equipment types, and construction phases for Area A as the Proposed Project. As shown in **Table 6.0-27: Alternative 3 Construction Vibration Levels**, development under Alternative 3 would be similar to the proposed Project and would not exceed significant vibration thresholds. Similar to existing conditions, the primary sources of vibration associated with operation would include passenger-vehicle circulation within the Project area and stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. Ground-borne vibration typically attenuates rapidly as a function of distance from the vibration source. Furthermore, the majority of the Project's operation-related vibration sources, such as mechanical equipment, would incorporate vibration attenuation mounts as required by the particular equipment specifications. Therefore, Alternative 3 would have less than significant vibration impacts during construction and operation.

TABLE 6.0-27: ALTERNATIVE 3 CONSTRUCTION VIBRATION LEVELS

Site	Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment					Significance Threshold (PPV ips)
		Vibratory Roller	Loaded Trucks	Jackhammer	Large Bulldozer	Small Bulldozer	
1	**Single-family residential uses along Milagro Place and Gibraltar Street**	0.056	0.020	0.009	0.024	0.001	0.2
2	**Single-family residential uses along Festivo Street and Del Sol High School**	0.002	0.001	0.000	0.001	0.000	0.2
3	**Multi-family residential uses along Camino Del Sol**	0.000	0.000	0.000	0.000	0.000	0.2
4	**Single-family residential uses along Valentina Drive**	0.002	0.001	0.000	0.001	0.000	0.2
5	**Single-family residential uses along Vivana Drive**	0.008	0.003	0.001	0.003	0.000	0.2
6	**Single-family residential uses along Cesar Chavez Drive**	0.037	0.013	0.006	0.0016	0.001	0.2
7	**Del Sol High School**	0.002	0.001	0.000	0.001	0.000	0.2

Source: US Department of Transportation, Federal Transportation Authority, *Transit Noise and Vibration Impact Assessment*. Meridian Consultants. *Noise Study*. **Appendix O.**

Similar to the proposed Project, the Project Site is located approximately 2.0 miles east of the Oxnard Airport; however, the Project Site is not located within the Oxnard Airport noise contours. As such, the location of the Project Site would not result in excessive noise for residents or employees in the Project area. Therefore, impacts would be less than significant.

Overall, Alternative 3 would result in similar temporary and long-term noise impacts compared to the proposed Project. Alternative 3 would still require implementation of **MM NOI-1** and adherence to applicable City noise standards, which would reduce construction noise impacts to less than significant levels. Therefore, impacts related to noise under Alternative 3 would be similar to than those associated with the proposed Project, and impacts would remain less than significant with mitigation incorporated.

Population and Housing

Construction of Alternative 3 would generate temporary employment related to grading and building construction. Construction workforces in the City and surrounding Ventura County region are large and diverse, and construction labor needs would be met by existing regional workers. Construction would be phased and limited in duration and would not require the permanent in-migration of workers. Therefore, construction under Alternative 3 would not directly or indirectly induce population growth.

During operation, the development of up to 656 residential units would add new residents to the City. Based on the Household Size Assumption and Population Estimation Memorandum (**Appendix P**), the average household sizes for the proposed housing types range from 1.84 to 2.4 persons per unit. Using these factors, Alternative 3 would generate an estimated population of approximately 1,300–1,575 persons, lower than the proposed Project's 2,064 population generation. This would represent a small portion of the City's anticipated population growth under SCAG's Connect SoCal forecast, which estimates that Oxnard will grow by approximately 29,867 residents between 2025 and 2050. Therefore, the population increase associated with Alternative 3 would fall within regional growth projections and would not induce substantial unplanned population growth.

Alternative 3 would also contribute to the City's housing supply by providing up to 656 new housing units, including required affordable units consistent with the City's Inclusionary Housing Program. SCAG projects that the City will add approximately 12,248 new housing units by 2050. The units developed under Alternative 3 would represent a fraction of this growth and would be consistent with the City's Housing Element and RHNA obligations. Because Area A is already planned for residential and mixed-use development within the NECSP and Urban Village Overlay, this alternative would not introduce housing in an unplanned location or indirectly encourage development beyond what is already forecasted.

Indirect population and housing growth could occur if the Project extended infrastructure into areas not currently served; however, Area A is already surrounded by existing roads, utilities, and

development. Infrastructure improvements under Alternative 3 would primarily serve the Project Site and would not induce additional off-site growth. Therefore, indirect growth impacts would be less than significant.

Overall, Alternative 3 would result in reduced population and housing impacts compared to the proposed Project due to its smaller development footprint and lower unit count. Development under this alternative would remain consistent with SCAG's regional growth forecasts, the City's General Plan, and Housing Element objectives. Therefore, impacts related to population and housing under Alternative 3 would be less than those associated with the proposed Project, and impacts would remain less than significant.

Public Services and Recreation

Fire Protection

Alternative 3 would accommodate up to 656 residential dwelling units, 37,000 square feet of commercial space, and approximately 10.27 acres of parks and open space. Compared to the proposed Project, Alternative 3 would allow a lower overall level of development and population growth, resulting in a reduced incremental increase in demand for fire protection and emergency response services. Similar to the proposed Project, development under Alternative 3 would be required to comply with applicable City fire protection standards, including requirements related to emergency access, fire flow, hydrant spacing, and fire suppression systems.

Although Alternative 3 would incrementally increase calls for service over time, the Oxnard Fire Department has adequate capacity to serve development under Alternative 3 from existing facilities, and no new or expanded fire facilities would be required. In addition, development under Alternative 3 would be subject to payment of applicable City development impact fees to support public safety services. Therefore, fire protection services impacts under Alternative 3 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Police Protection

Police protection services under Alternative 3 would continue to be provided by the Oxnard Police Department, which currently serves the Project Site within District 1, Beat 31. Compared to the proposed Project, Alternative 3 would result in a reduced residential buildout limited to Phase I development within Area A and a correspondingly smaller population increase. Similar to the proposed Project, Alternative 3 would comply with City design standards related to access and visibility, and would be subject to applicable development impact fees to ensure adequate police services are maintained. Because the Oxnard Police Department can continue to serve the Project Site from existing facilities and staffing levels, and no new or expanded police facilities would be required, Therefore, police protection services impacts under Alternative 3 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Schools

Alternative 3 would generate fewer residential units and a smaller population increase than the proposed Project and would therefore result in the generation of fewer students within the RSD and OUHSD service areas. Consistent with the methodology used for the proposed Project, student generation estimates for Alternative 3 are based on elementary and middle school student generation rates provided by RSD and high school student generation rates provided by OUHSD. These rates were derived from the Rio School District Developer Fee Justification Study and the Oxnard Union High School District Fee Justification Report for New Residential and Commercial/Industrial Development.

Based on development of up to 656 dwelling units under Alternative 3, implementation of this alternative is estimated to generate approximately 223 new students in total. This includes an estimated 125 elementary school students, 59 middle school students, and 39 high school students. While it is possible that some new residents and students may relocate from other areas within the RSD and OUHSD service boundaries, for conservative analysis purposes, this evaluation assumes that all students generated under Alternative 3 would represent additional enrollment within the respective districts.

Although both RSD and OUHSD currently operate at or above capacity, development under Alternative 3 would result in a reduced increase in student enrollment compared to the proposed Project's addition of 318 new students. Residential development under Alternative 3 would be subject to payment of State-mandated school impact fees pursuant to SB 50, which is considered full and complete mitigation under CEQA. Therefore, school impacts under Alternative 3 would be similar than those associated with the proposed Project, and impacts would be less than significant.

Parks and Recreation

Alternative 3 would reduce development intensity compared to the proposed Project by limiting development within Area A of the Project Site. Under Alternative 3, approximately 10.27 acres of parks and open space would be developed, compared to 11.27 acres under the proposed Project, representing a reduction of approximately 1 acre of park and open space. Although Alternative 3 would provide less parkland than the proposed Project, the reduced residential buildout would also result in lower demand for park and recreational facilities.

Alternative 3 would generate approximately 1,575 residents at buildout. Based on approximately 10.27 acres of parks and open space and Alternative 3's proposed population, Alternative 3 would have a parkland service ratio of approximately 6.52 acres of parkland per 1,000 residents.[9] This would exceed the City's parkland service standard of 3 acres per 1,000 residents. Under the City standard, a population of approximately 1,575 persons would require approximately 4.73 acres of parkland, and Alternative 3 would provide a surplus of approximately 5.54 acres. In addition.

9 (10.27 acres / 1,575 persons x 1,000).

Alternative 3 would exceed the proposed Project's park to population ratio of 5.46 acres per 1,000 residents.

Because Alternative 3 would result in a lower residential population compared to the proposed Project, impacts to parks and recreational facilities would be similar to or less than those associated with the proposed Project. Therefore, park and recreation impacts under Alternative 3 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Libraries

Development under Alternative 3 would result in a lower residential population compared to the proposed Project due to the reduced residential buildout associated with Phase I development only. As with the proposed Project, residents under Alternative 3 would be served by the City of Oxnard Library system.

Because Alternative 3 would generate fewer residents than the proposed Project, it would result in a reduced demand for library services, facilities, and programming compared to the proposed Project. Alternative 3 would generate approximately 1,575 residents at buildout. Using the ALA minimum standard of 1.0 square foot of library space per resident and the City's existing library inventory of approximately 95,560 square feet serving an estimated population of 198,733 persons, development under Alternative 3 would incrementally increase the City's population to approximately 200,308 persons. Thus, the ratio of library square footage per resident would be approximately 0.48 square feet per resident, which is consistent with existing conditions and the proposed Project.

As with the proposed Project, development under Alternative 3 would be subject to the City's Growth Requirement Capital Fee, which is imposed on residential development to fund the expansion of essential public facilities, including libraries, to maintain adequate service levels. Payment of the applicable capital fee would ensure that library facilities are adequately funded to accommodate incremental demand associated with Alternative 3. Therefore, library impacts under Alternative 3 would be similar to those associated with the proposed Project, and impacts would be less than significant.

Therefore, impacts related to public services under Alternative 3 would be similar to those associated with the proposed Project, and impacts would remain less than significant.

Transportation

Development of Alternative 3 would develop Phase I of the proposed Project, which incorporates the same circulation improvements, roadway connections, and pedestrian and bicycle facilities analyzed for the proposed Project. Because Alternative 3 would implement the same transportation network and multimodal improvements evaluated for the proposed Project, it would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Pursuant to CEQA Guidelines Section 15064.3 and SB 743, transportation impacts under Alternative 3 would be evaluated based on VMT. Given the reduced residential and commercial buildout compared to the proposed Project, Alternative 3 would generate fewer daily vehicle trips and would therefore result in similar or reduced VMT compared to the proposed Project. As with the proposed Project, the commercial component would be local-serving in nature and the residential component would remain within a low-VMT context. Therefore, VMT impacts under Alternative 3 would remain less than significant, consistent with City screening criteria.

With respect to roadway operations, Alternative 3 would generate fewer peak-hour vehicle trips than the proposed Project due to its reduced residential intensity. As a result, traffic volumes at analyzed intersections would be lower than those evaluated for the proposed Project. Although Alternative 3 would still introduce new traffic to the surrounding roadway network, it would not cause unacceptable deterioration of intersection level of service or roadway operations beyond those analyzed for the proposed Project. Traffic impacts under Alternative 3 would remain less than significant.

During construction, Alternative 3 could temporarily affect local circulation due to construction-related vehicle trips, potential lane closures, and staging activities. However, as with the proposed Project, construction under Alternative 3 would be required to implement **MM TRANS-1**, which mandates preparation and implementation of a Construction Mitigation Plan. This plan would identify construction staging areas, haul routes, employee parking, traffic control measures, pedestrian and bicycle safety provisions, and emergency access requirements. Implementation of **MM TRANS-1** would ensure that construction-related circulation effects and potential hazards are minimized and maintained at less than significant levels, similar to the proposed Project.

Once operational, Alternative 3 would not substantially increase roadway hazards, result in unsafe geometric design features, or create inadequate emergency access. The internal roadway network and site access would be designed to City standards and reviewed by the City's Traffic Engineer, ensuring safe and adequate circulation for vehicles, pedestrians, bicyclists, and emergency responders.

Therefore, impacts related to transportation under Alternative 3 would be similar to than those associated with the proposed Project, and impacts would remain less than significant with mitigation incorporated.

Tribal Cultural Resources

As described in **Section 4.17: Tribal Cultural Resources**, the Historic Resources Report did not identify any tribal cultural resources within the Project Site. Materials identified during field investigations consisted of historic-period artifacts associated with the Maulhardt family's agricultural operations and did not qualify as tribal cultural resources under Public Resources Code Section 21074.

Consistent with SB 18, the City contacted all applicable tribes, including the Santa Ynez Band of Chumash Indians and tribal contacts identified by the NAHC. The Santa Ynez Band declined consultation, and the NAHC confirmed that no known sacred sites are recorded within the Project Site. Two tribal contacts, the Barbareño/Ventureño Band of Mission Indians and the Coastal Band of the Chumash Nation requested Native American monitoring during ground disturbance. Therefore, **MM TCR-1** requires Native American monitoring during ground-disturbing construction activities and establishes procedures for the inadvertent discovery of tribal cultural resources or human remains.

Similar to the proposed Project, development under Alternative 3 would involve grading and construction activities that could disturb native soils, resulting in the potential for unanticipated discoveries of tribal cultural resources during construction. However, Alternative 3 would implement **MM TCR-1** to ensure appropriate Native American monitoring and treatment of any unanticipated discovery is evaluated and treated consistent with PRC §5097.98, Health and Safety Code §7050.5, and CEQA Guidelines §15064.5. With this measure, impacts to tribal cultural resources would be less than significant, similar to the proposed Project.

Therefore, impacts related to tribal cultural resources under Alternative 3 would be similar to those associated with the proposed Project, and impacts would remain less than significant.

Utilities and Service Systems

Water Service and Supply

Alternative 3 would accommodate up to 656 residential dwelling units, 37,000 square feet of commercial space, and approximately 10.27 acres of parks and open space. Water service under Alternative 3 would be provided by the City of Oxnard, consistent with the City's existing water supply planning framework and UWMP.

As shown in **Table 6.0-28: Projected Water Demand for Alternative 3**, the annual total water demand for Area A was determined using land use–specific demand factors from the City's PWIMP, AB 1668/SB 606 indoor efficiency standards, and MEWLO landscape guidelines, resulting in approximately 107.55 afy. As a result, overall water demand under Alternative 3 would be reduced relative to the proposed Project, as the estimated annual total water demand for the proposed Project was determined to be 149.95 afy.

TABLE 6.0-28: PROJECTED WATER DEMAND FOR ALTERNATIVE 3

Land Use	Units (DU or AC)	Unit Usage (AFY/DU or AFY/AC)	Annual Usage (AFY)
Area A			
Residential	656 DU (1,575 persons)	0.0616 afy/persona	97.02 afy
Commercial	0.8494028 ac	2.240 afy/acb	1.90 afy
Landscaping (Parks)	10.27 Acres	0.840 afy/acd	8.63 afy
	Subtotal Area A		*107.55 afy*

TABLE 6.0-28: PROJECTED WATER DEMAND FOR ALTERNATIVE 3			
Land Use	Units (DU or AC)	Unit Usage (AFY/DU or AFY/AC)	Annual Usage (AFY)
Area B			
High School			42.300 afy
Total Projected Water Demand:			**149.85 afy**

Notes:

[a] *AB 1668/SB 606, which mandates a per person consumption of 55 gpd.*
[b] *City of Oxnard. Memorandum 2.2, Table 9. "2015 Public Works Integrated Master Plan." Accessed January 2026.*
[c] *ETWU per MEWLO Guidelines, assuming a blend 15% lawn area and 85% drought tolerant areas on all development lots.*
[d] *City of Oxnard. Memorandum 2.2, Table 5. "2015 Public Works Integrated Master Plan." Accessed January 2026.*

The City's UWMP demonstrates that adequate water supplies are available to serve existing and planned development within the City's service area under normal, single-dry and multiple-dry-year conditions. Development under Alternative 3 would occur within the assumptions evaluated in the UWMP and would not exceed the City's projected water supply capacity. Future development pursuant to Alternative 3 would be required to demonstrate compliance with applicable water service provider requirements, water conservation standards and regulatory approvals in effect at the time of development.

Although Alternative 3 would include approximately 10.27 acres of parks and open space, irrigation demand associated with these areas would be subject to the City's water efficiency requirements, including drought-tolerant landscaping standards and use of efficient irrigation systems, consistent with City policies and State regulations.

Alternative 3 would not require the construction of new or expanded water supply facilities or infrastructure beyond those already planned for General Plan buildout. Therefore, water supply impacts under Alternative 3 would be less than those associated with the proposed Project, and impacts would remain less than significant.

Wastewater Collection and Treatment

Wastewater service under Alternative 3 would be provided by the City of Oxnard wastewater collection and treatment system. The City owns and operates its own wastewater collection and treatment system, the OWTP, which has permitted capacity of 31.7 mgd, an average daily flow of 16 mgd, a historic average dry weather flow of approximately 20 mgd, and an expected increase to 27.5 mgd by 2040. According to the City's latest wastewater generation information in 2020, the City collected a volume of approximately 17 mgd (19,088 afy) of wastewater within the City's service area.[10]

10 City of Oxnard. "Chapter 6, Water Supply Characterization." In *2020 Urban Water Management Plan*.

Development of Alternative 3 would generate wastewater from residential and commercial uses associated with buildout of up to 656 residential dwelling units and 37,000 square feet of commercial space. **Table 6.0-29: Projected Sewage Generation for Alternative 3** shows that Alternative 3 would generate approximately 49,984 gpd, or 0.050 mgd of wastewater. Based on the reduced intensity of development compared to the proposed Project, overall wastewater flows under Alternative 3 would be lower than those associated with the proposed Project, which would generate approximately 66,452 gpd, or 0.066 mgd of wastewater. As with the proposed Project, any future development under Alternative 3 would be reviewed to confirm adequate conveyance and treatment capacity is available and to ensure compliance with State and local wastewater requirements for operation and maintenance of the sanitary sewer system.

TABLE 6.0-29: PROJECTED SEWAGE GENERATION FOR ALTERNATIVE 3

Land Use	Acreage	Wastewater Duty Factor (gpad)	Wastewater Flow (gpd)	Wastewater Flow (gpm)2
656 DU	20.52	2,380	48,837.60	33.92
Commercial	0.85	1,350	1,146.7	0.80
Total Average Daily Flow			**49,984.29**	**34.71**
Total Peak Dry Weather Flow (PDWF = 1.81)[1]			**90,470.56**	**62.83**
RDI/I[3]	21.37	600	12,821.64	8.90
Total Peak Wet Weather Flow			**103,292.20**	**71.73**

Notes:

1 *The peak dry weather factor was calculated using the following equation as given in the 2005 Draft Oxnard Wastewater Master Plan Update: Peak Dry Weather Factor = 1.73 x (Average Dry Weather Flow Rate)-0.0337. This produced a Peak Dry Weather Factor of 1.81 for the average day flow resulting in a Peak Dry Weather Flow of 312 gpm.*

2 *The gallons per minute was calculated using by dividing gallons per day by 1,440 (the number of minutes in a day).*

3 *RDI/I (20.52 + 0.8494 = 21.37 ac at 600 gpad).*

gpad = gallons per acre per day gpd = gallons per day gpm = gallons per minute RDI/I = Rainfall Dependent Inflow/Infiltration

Source: Kennedy/Jenks Consultants, *Teal Club Development Infrastructure Review – Evaluation of Wastewater Facilities*, May 2007.

Overall, Alternative 3 would result in reduced wastewater generation and demand compared to the proposed Project and would not require additional wastewater conveyance or treatment capacity beyond what would otherwise be planned and evaluated through standard City review and permitting processes. Therefore, impacts related to wastewater under Alternative 3 would be less than those associated with the proposed Project, and impacts would remain less than significant.

Dry Utilities (Electricity, Natural Gas, and Telecommunications)

Alternative 3 would only implement Phase I of the proposed Project and would accommodate up to 656 residential dwelling units, 37,000 square feet of commercial space, and approximately 10.27 acres of parks and open space. Compared to the proposed Project, Alternative 3 would result in lower residential population and reduced overall intensity of development, which would correspondingly reduce demand for dry utility services. As discussed above, the estimated electricity demand for

Alternative 3 is approximately 5.1 million kWh (5.1 GWh) per year, compared to the approximately 5.8 million kWh (5.8 GWh) per year for the proposed Project.

Similar to the proposed Project, no natural gas is anticipated to be used for construction of Alternative 3, and as such, Alternative 3 would not require the relocation, expansion, or construction of new natural gas facilities. During operation, natural gas service under Alternative 3 would be provided by SoCalGas. Natural gas demand would be generated by residential and commercial uses and would be lower than the proposed Project due to the reduced residential buildout. As discussed above, the estimated natural gas consumption for Alternative 3 is approximately 15.5 million kBTU (15.5 MMcf) compared to the 17.5 million kBTU (17.5 MMcf) per year for the proposed Project.

With respect to telecommunication services, demand for services under Alternative 3 would be similar in type but reduced in scale in comparison to the proposed Project due to the lower development intensity. Similar to the proposed Project, Alternative 3 would require submission, review, and approval of utility plans through City and applicable utility providers to ensure that electricity, natural gas, and telecommunications demands could be adequately served.

Overall, Alternative 3 would require submission, review, and approval of utility plans through City and applicable utility providers to ensure that electricity, natural gas, and telecommunications demands could be adequately served. Therefore, impacts related to dry utilities under Alternative 3 would be less than those associated with the proposed Project, and impacts would remain less than significant.

Solid Waste

With Alternative 3, development of the Project Site would only implement Phase I of the proposed Project and would accommodate up to 656 residential dwelling units, 37,000 square feet of commercial space, and approximately 10.27 acres of parks and open space. Solid waste generation under Alternative 3 would be associated primarily with residential and commercial development. As shown in **Table 6.0-30: Projected Solid Waste Generation for Alternative 3,** the development that would occur pursuant to Alternative 3 would generate approximately 2.97 tons per day or 1,084 tons per year. Compared to the proposed Project which would generate 4 tons per day or 1,460 tons of solid waste per year, Alternative 3 would result in an overall decrease in solid waste generation. Solid waste generation would remain consistent with City waste generation characteristics and disposal capacity.

Solid waste generated by Alternative 3 would be collected and disposed of in accordance with applicable requirements and would be served by the Del Norte Regional Recycling and Transfer Station, which has a permitted capacity of 2,779 tons per day.[11] The Toland Road Landfill would also serve the Project Site, and has a permitted capacity of 2,864 tons per day. The Simi Valley Landfill has

11 CalRecycle. "SWIS Facility/Site Activity Details. Del Norte Regional Recycling and Transfer."

a permitted capacity of 9,250 tons of solid waste per day.[12,13] Alternative 3 would generate less solid waste compared to the proposed Project and available landfill capacity is sufficient to accommodate solid waste generated by Alternative 3. Therefore, Alternative 3 would not generate solid waste in excess of State or local standards, and solid waste impacts would remain less then significant, similar to the proposed Project. Although Alternative 3 would result in incrementally greater solid waste impacts than the proposed Project, neither Alternative 3 or the Project would result in significant solid waste impacts.

TABLE 6.0-30: PROJECTED SOLID WASTE GENERATION FOR ALTERNATIVE 3

Type of Use	Unit	Quantity	Waste Generation Rate[a] (lb./unit/day)
Residential	du	656	4/du
Commercial	sq ft	37,000	5/1000 sq ft/ day
Open Space	acres	10.27	.007 lbs/sq ft/day
Total Daily Estimate			**5,941 lbs/day (2.97 tons)**

Note: du=dwelling unit; sq ft= square feet

[a] *CalRecycle, Estimated Solid Waste Generation R*

Therefore, impacts related to utilities and services systems under Alternative 3 would be reduced than those associated with the proposed Project, and impacts would remain less than significant.

6.7.3 Summary of Comparative Impacts

A summary comparison of impacts associated with the Project Alternatives is provided in **Table 6.0-31: Comparison of Alternatives to Project**. Due to the reduction in development footprint and intensity, and the non-development of Area C, Alternative 3 would substantially lessen significant air quality and cultural resource impacts to less than significant levels compared to the proposed Project. Alternative 3 would also incrementally reduce impacts related to agricultural resources, biological resources, energy, GHGs, population and housing, and public services and recreation, and utilities and service systems; however, these impacts would remain less than significant, consistent with the proposed Project.

Impacts to agricultural resources would remain significant and unavoidable with Alternative 2, similar to the proposed Project. For the remaining environmental topics, including aesthetics and urban design, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, transportation, and tribal cultural resources, Alternative 3 would result in impacts that are similar to those identified for the proposed Project.

12 CalRecycle. "SWIS Facility/Site Activity Details. Toland Road Landfill."

13 CalRecycle. "SWIS Facility/Site Activity Details. Simi Valley Landfill."

6.7.4 Relationship to Project Objectives

While Alternative 3 would not develop Area C, it would develop a walkable urban village that includes a mixture of housing type, land uses, and multiple transportation and circulation options within Area A (Objective 1). Alternative 3 would provide neighborhood-serving commercial uses in proximity to residential development and open space, and these uses would generate additional retail sales tax revenue for the City (Objective 2). Alternative 3 would partially meet Objective 3 by developing approximately 11 acres of parkland, including the expansion of the existing East Village Park.

Alternative 3 would partially meet Objective 4 by providing housing opportunities for a range of income segments; however, it would not maximize residential development potential allowed by the available water allocation for the Project Site. Alternative 3 would meet Objective 5 by achieving the required affordable housing percentages. Alternative 3 would also meet Objective 6 by creating a human-scaled neighborhood with a mix of housing types, parks and open space, and active commercial building frontages. In addition, Alternative 3 would meet Objective 7 by adhering to the City's design standards and the Project's goal of developing high-quality, human-scaled development.

6.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As previously discussed, analysis of a reasonable range of Alternatives is required by CEQA. The purpose of the Alternatives analysis is to explain potentially feasible ways to avoid or minimize the significant effects identified for the proposed Project. Furthermore, State CEQA Guidelines, Section 15126.6(e)(2) requires an EIR to identify an Environmentally Superior Alternative among those evaluated in an EIR.

A summary comparison of impacts associated with the Project Alternatives is provided in **Table 6.0-31: Comparison of Alternatives to Project**. Of the Alternatives considered in this DEIR section, the No Project/No Development Alternative is environmentally superior to the other Alternatives, because this Alternative would avoid the significant and unavoidable impacts identified for the proposed Project.

According to the State CEQA Guidelines, if the No Project/No Development Alternative is identified as the environmentally superior Alternative, the DEIR is also required to identify an environmentally superior among the other Alternatives. Of the other Alternatives considered, Alternative 3 (Phase I Only) would be considered environmentally superior because it would result in the greatest overall reduction in environmental impacts when compared to the proposed Project, while still meeting a majority of the Project Objectives.

Alternative 3 would reduce the overall development footprint and intensity by limiting development to Area A and retaining Area C in its existing condition. As a result, Alternative 3 would substantially lessen significant environmental impacts associated with the proposed Project in several key resource areas.

Alternative 3 would substantially reduce significant air quality impacts to less than significant compared to the proposed Project by having operational emissions under VCAPCD's operational emissions. By reducing the total number of residential units, commercial square footage, and associated construction activities, Alternative 3 would generate lower construction and operational emissions. This reduction would result in Alternative 3 operation emissions to be within VCAPCD's operational emission thresholds and reduce the Project's contribution to regional air quality impacts.

Alternative 3 would also substantially reduce cultural resources impacts compared to the proposed Project, which would have significant and unavoidable impacts to cultural resources. Because Area C would remain undeveloped, Alternative 3 would avoid demolition or alteration of historic structures associated with the Maulhardt Ranch that are eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and/or as City Landmarks. As a result, Alternative 3 would avoid impacts to historical resources that would otherwise require documentation and recordation mitigation under the proposed Project, thereby substantially reducing impacts to historic resources.

As detailed in Alternative 3's aesthetics and urban design section above, the barn and residence are in a deteriorated condition and have been determined to be structurally unsafe. The fallowed orchard and existing structures contribute to the current visual condition of Area C and do not reflect the City's goals for high-quality urban development. Under Alternative 3, Area C would remain in its existing condition, and visual conditions in this area would not change substantially from existing conditions. Although the continued presence of deteriorated structures and fallowed agricultural land would not enhance the visual character of the site, it would also not result in new or more severe aesthetic impacts.

Alternative 3 would incrementally reduce impacts related to biological resources, GHGs, energy consumption, population and housing, and transportation by reducing development intensity and overall site disturbance, while still implementing required mitigation measures where applicable. Although Alternative 3 would not avoid significant impacts related to agricultural resources due to development within Area A, it would avoid conversion of farmland in Area C and therefore reduce the overall extent of agricultural land conversion when compared to the proposed Project.

Accordingly, Alternative 3 is considered the environmentally superior alternative because it would avoid or substantially lessen significant air quality and cultural resources impacts compared to the proposed Project, while still achieving many of the Project's fundamental planning and community objectives.

TABLE 6.0-31: COMPARISON OF ALTERNATIVES TO PROJECT				
Environmental Topic	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 Existing Designations	Alternative 3 Phase I Only
Aesthetics and Urban Design	Less than Significant	Reduced (No impact)	Reduced (Less than Significant)	Similar (Less than Significant)
Agricultural Resources	Significant and Unavoidable	Reduced (No impact)	Similar (Significant and Unavoidable)	Reduced (Significant and Unavoidable)
Air Quality	Significant and Unavoidable	Reduced (No impact)	**Reduced (Less than Significant with Mitigation)**	**Reduced (Less than Significant with Mitigation)**
Biological Resources	Less than Significant with Mitigation	Reduced (No impact)	Similar (Less than Significant with Mitigation)	Reduced (Less than Significant with Mitigation)
Cultural Resources	Significant and Unavoidable	Reduced (No impact)	Similar (Significant and Unavoidable)	**Reduced (Less than Significant with Mitigation)**
Energy	Less than Significant	Reduced (No impact)	Reduced (Less than Significant)	Reduced (Less than Significant)
Geology and Soils	Less than Significant with Mitigation	Reduced (No impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Greenhouse Gas Emissions	Less than Significant	Reduced (No impact)	Reduced (Less than Significant)	Reduced (Less than Significant)
Hydrology and Water Quality	Less than Significant	Reduced (No impact)	Similar (Less than Significant)	Similar (Less than Significant)
Land Use and Planning	Less than Significant	Reduced (No impact)	Similar (Less than Significant)	Similar (Less than Significant)
Mineral Resources	Less than Significant	Reduced (No impact)	Similar (Less than Significant)	Similar (Less than Significant)
Noise	Less than Significant with Mitigation	Reduced (No impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)

TABLE 6.0-31: COMPARISON OF ALTERNATIVES TO PROJECT				
Environmental Topic	Proposed Project	Alternative 1 No Project/No Development	Alternative 2 Existing Designations	Alternative 3 Phase I Only
Population and Housing	Less than Significant	Reduced (No impact)	Reduced (Less than Significant)	Reduced (Less than Significant)
Public Services and Recreation	Less than Significant	Reduced (No impact)	Similar (Less than Significant)	Reduced (Less than Significant)
Transportation	Less than Significant	Reduced (No impact)	Similar (Less than Significant)	Similar (Less than Significant)
Tribal Cultural Resources	Less than Significant with Mitigation	Reduced (No impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Utilities and Service Systems	Less than Significant	Reduced (No impact)	Similar (Less than Significant)	Reduced (Less than Significant)

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8.0 REPORT PREPARERS

8.1 EIR PREPARERS

8.1.1 Lead Consultant

Meridian Consultants

374 Poli Street, Ste. 200
Ventura CA 93001
www.meridianconsultantsllc.com

Tony Locacciato – Principal Consultant
Victor Paitimusa – Project Manager
Christ Kirikian – Managing Consultant
Diana Alcocer – Project Planner
Monica Padilla – Project Planner
Nikki Heredia – Project Environmental Scientist
Lisa Maturkanic – Senior Administrative Operations Manager

8.1.2 Lead Agency

City of Oxnard Community Development Department

214 South C Street
Oxnard, CA 93030

Joe Pearson II, AICP, Planning and Environmental Services Manager

8.1.3 Other Preparers

Advanced Geotechnical Services, Inc.

5251 Verdugo Way, Suite L
Camarillo, CA 93012

Shaun Simon, P.E., CEG, Principal Engineer
Brett Wanner, CEG, Principal Engineering Geologist

All-Trade Engineering & Design

17 E High Street Suite A
Moorpark, CA 93021

Shane Judd, P.E., Principal

Fehr & Peers

600 Wilshire Boulevard, Suite 1050
Los Angeles, CA 90017
fehrandpeers.com

John Muggridge, Principal
Alex Melaragno, Senior Transportation Engineer/Planner

Jensen Design & Survey, Inc.

1672 Donlon St.
Ventura, CA 93003

Ava Ediger, P.E., Senior Engineer

Pax Environmental, Inc.

226 West Ojai Avenue STE 101 #157
Ojai, CA 93023
www.paxenviro.com

Andy Fredell, Senior Project Manager/Senior Biologist/Safety Officer

Post/Hazeltine Associates

213A West Anapamu Street
Santa Barbara, CA 93105

Pamela Post, Ph.D., Principal
Tim Hazeltine, Principal

Provenience Group, Inc.

1759 Cottonwood Street
Solvang, CA 93463

Carole Denardo, M.A., RPA, Owner/Principal
Jenna Levine, MSc

TRAK Environmental Group, Inc.

1595 E. Thompson Boulevard
Ventura, CA 93001

Robert Cashier, MS, CPSS
Bradford S. Newman, PG, CHG