Class 32 Categorical Exemption

Simi Valley Transit Center Improvement Project

LEAD AGENCY:

City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, CA 93063

PREPARED BY:

BKF
Emily Elliott, AICP
Practice Lead – Community Planning
3850 Vine Street, Suite 110
Riverside, CA 92507

July 2026

Table of Contents

1 INTRODUCTION....3
2 CEQA CATEGORICAL EXEMPTION STATUS....3
3 PROJECT OVERVIEW....3
4 CEQA EXEMPTION DETERMINATION ANALYSIS....5
5 STATE CEQA GUIDELINES SECTION 15300.2 - EXCEPTIONS....25
6 CONCLUSION....28

Attachments

Attachment A Project Maps and Project Plans
Exhibit 1: Regional Vicinity
Exhibit 2: Project Site
Exhibit 3: Site Plan
Attachment B Biological Memorandum
Attachment C Noise Data
Attachment D Air Quality Data
Attachment E Hydrology Report

1 INTRODUCTION

BKF, Inc. is pleased to submit this memorandum in consideration of the California Environmental Quality Act (CEQA) Class 32 Categorical Exemption for the proposed Simi Valley Transit Center Improvement Project (project). The purpose of the project is to develop a transit hub which comprises of paved area, solar panel carports, and electric vehicle (EV) bus chargers.

2 CEQA CATEGORICAL EXEMPTION STATUS

Section 21084 of the California Public Resources Code specifically requires the State CEQA Guidelines to include a list of classes (or categories) of projects that have been determined not to have a significant effect on the environment and are therefore exempt from the provisions of CEQA. The State CEQA Guidelines Cal. Code Regs. tit. 14 Sections 15301 through 15333 constitute the list of categorically exempt projects and contain specific criteria that must be met for a project to be found categorically exempt. Additionally, Section 15300.2 of the State CEQA Guidelines includes a list of exceptions to the use of categorical exemptions, none of which may apply to a project for it to qualify for a categorical exemption. State CEQA Guidelines Section 15332 states the following:

Cal. Code Regs. Tit. 14 Section 15332. In-Fill Development Projects. Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

c. The project site has no value, as habitat for endangered, rare or threatened species.

d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e. The site can be adequately served by all required utilities and public services.

3 PROJECT OVERVIEW

Project Location

The 1.31-acre or approximately 57,248 square feet site is specifically located at 3970 Avenida Simi within the City of Simi Valley (City), California; refer to Exhibit 1, *Regional Vicinity* in Attachment A, *Project Maps and Project Plans*. The project site is owned by the County and would be leased to the City for the proposed project. The project site comprises of a portion of assessor parcel number (APN): 616-0-080-345. The City is located within Ventura Country and is bordered by the City of Thousand Oaks to the south and the City of Moorpark to the west. The City also borders unincorporated Ventura County to the north and Chatsworth, a suburban neighborhood of Los Angeles, to the east. Local access to the project site is provided by Avenida

Simi to the north and Tapo Canyon Road to the east. Regional access is provided by California State Route 118 (SR-118).

Existing Site Characteristics

The project site consists of vacant, undeveloped land located along the northern boundary of the parking lot serving the Simi Valley Public Library; refer to Exhibit 2, *Project Site* in Attachment A, *Project Maps and Project Plans*. Existing electrical infrastructure is present on-site near Avenida Simi. The site contains sparse landscaping and includes 39 trees on-site.

Existing Land Use and Zoning

According to the *City of Simi Valley Zoning Map*, the project site is zoned as Civic Center (CC).[1] Additionally, per the *City of Simi Valley General Plan Land Use Map*, the project site has a land use designation of Civic Center.[2] Surrounding zoning includes Residential Medium Density (RM) to the north, Residential Very High Density (RVH) and Commercial Planned Development (CPD) to the east, and CC to the south and west. Surrounding land uses include Residential Medium Density to the north, Residential Very High Density and General Commercial to the east, and Civic Center to the south and west.

Project Description

The proposed project involves the development of a paved transit hub encompassing approximately 35,230 square feet of pavement on currently vacant land. The paved transit facility would comprise of two dedicated bus lanes on-site, a solar panel carport canopy that covers the proposed bus lanes, and pantograph EV charging dedicated for buses; refer to Exhibit 3, *Site Plan* in Attachment A, *Project Maps and Project Plans*. The proposed solar canopy is planned to reach a height of approximately 21 feet, 4 inches and would be situated between the two proposed bus lanes on-site. The proposed solar panel carport canopy would be equipped with down-facing lighting to illuminate the bus lanes. The proposed bus lanes are designed to accommodate bus parking and the installation of pantograph EV bus chargers, supporting the eventual adoption of the Simi Valley Transit electric bus fleet. In total, the proposed project would include eight bus bays which allow for the development of up to eight pantograph EV bus chargers. The project does not include the construction of any enclosed structures.

Access to the site will be provided via a proposed ingress and egress onto Tapo Canyon Road, with the egress lane (northernmost lane) specifically designed to allow buses to make right turns only onto Tapo Canyon Road. A secondary access route would be provided by the existing ingress and egress along Avenida Simi; refer to Exhibit 3. As part of the proposed project, roadway improvements (pedestrian striping, pedestrian walkways, etc.) would be conducted on-site and along the proposed ingress and egress onto Tapo Canyon Road. Furthermore, the proposed project would remove the existing pedestrian sidewalk along

---

1 City of Simi Valley, *City of Simi Valley Zoning Map*, https://www.simivalley.org/home/showpublisheddocument/29990/638987202218800000, revised November 14, 2025.

2 City of Simi Valley, *City of Simi Valley General Plan Land Use Map*, https://www.simivalley.org/home/showpublisheddocument/24714/638827537735600000, revised May 13, 2025.

Tapo Canyon Road to construct a dedicated bus turnout. The proposed project would also include 16,131 square feet of landscaping on-site. The proposed transit hub would require a conditional use permit (CUP) as part of the project (CUP-S-2025-0015).

The proposed project would not substantially alter existing bus operations in the surrounding area. The facility would support the Simi Valley Transit's transition to an electric bus fleet, provide a safe and central location for various Simi Valley transit routes, and relocate the existing bus stop along roadways which would allow for smoother traffic. Specifically, the existing bus stop is located approximately 150 feet south of the intersection of Avenida Simi and Tapo Canyon Road and currently serves Simi Valley Transit Routes 10, 20, and 30. Routes serviced by the Simi Valley Transit would be relocated on-site and serviced by the proposed transit hub. The relocated bus shelter along Tapo Canyon Road would be moved further back along the new bus turnout and would only be utilized by Ventura County Transportation Commission (VCTC). The proposed pantograph would allow electric buses to charge during layovers between trips which would extend operating ranges. No overnight or long-term bus charging would occur at the project site. Additionally, the proposed project would not require employees on-site since the pantograph would be located overhead and connect to the electric buses automatically.

Although the project would relocate existing Simi Valley Transit operations into a centralized transit hub, the project would not introduce new bus routes, increase service frequency, or expand the existing fleet during operation.

4 CEQA EXEMPTION DETERMINATION ANALYSIS

Criterion (a) ***The project is consistent with applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.***

General Plan Consistency

The City adopted the *City of Simi Valley General Plan* (General Plan) in June 2012**.** The General Plan included a Community Development chapter which includes the Land Use and Community Design, Economic Development, Social and Environmental Justice, and Historic and Cultural Resources. Table 1, *City of Simi Valley General Plan Consistency Analysis*, discusses the project's consistency with applicable goals and policies contained within the General Plan Community Development chapter.

Table 1
City of Simi Valley General Plan Consistency Analysis

City of Simi Valley General Plan Goals and Policies	Consistency Analysis
Goal LU-1 – Growth and Change. Sustainable growth and change, achieved through orderly and well-planned development, meet the needs of existing and future residents and businesses, ensure the effective and equitable provision of public services, and efficiently use land and infrastructure.	

Policy LU-1.2 – Development Location. Limit development to lands within the Simi Valley City Urban Restriction Boundary (CURB), as shown in Figure LU-1 of the General Plan, thereby protecting existing agriculture, open space, viewsheds, wildlife, and watersheds surrounding the city from development impacts and limiting urban sprawl.	**Consistent**. The proposed project would develop a transit hub within the Simi Valley CURB. As discussed, the proposed project would relocate existing bus routes along Tapo Canyon Road onto the project site. The proposed transit hub would provide a centralized location for bus operations and would promote pedestrian safety while allowing for the future integration of the Simi Valley Transit EV bus fleet.
Policy LU-1.3 – Development Priorities. Prioritize future growth as infill and redevelopment of existing developed areas re-using and, where appropriate intensifying development of vacant and underutilized properties within the CURB. Allow for growth on the immediate periphery of existing development in limited designated areas, where this is guided by standards to assure seamless integration and connectivity with adjoining areas and open spaces and in a way that minimizes encroachment on the open space areas or places new residential development at increased risk for wildfire. The Growth Diagram below illustrates the typical locations in which new development will be permitted.	**Consistent**. The proposed project is an in-fill development which would revitalize a vacant and underutilized area of the City's Civic Center. The proposed project would relocate the existing bus operations along Tapo Canyon Road onto the project's site which would reduce traffic congestion and promote pedestrian safety.
Policy LU-1.12 – **Complementary Land Use**. Require that existing and future land uses complement adjoining City uses and character.	**Consistent**. The proposed project would construct a transit center on a site with the current land use and zoning designation of Civic Center. The proposed transit center is a permitted use upon approval of a CUP. Additionally, bus operations (Bus Route 10, 20, and 30) serviced by Simi Valley Transit currently exist to the east of the project site along Tapo Canyon Road. The proposed project would relocate Simi Valley Transit operations onto the project site which would reduce congestion, improve pedestrian safety, and revitalize existing vacant land with landscaping and transit-related amenities. The bus shelter along Tapo Canyon Road would be relocated due to the proposed dedicated bus turnout; refer to Exhibit 3. The bus shelter along Tapo Canyon Road would be utilized only for VCTC routes.
Goal LU-2 – Land Use Diversity and Choices for Residents. A mix of land uses is provided to meet the diverse needs of Simi Valley's residents, offer a variety of employment opportunities, and allow for the capture of regional population and employment growth.	
Policy LU-2.5 – **Visitor-Serving Uses**. Provide for visitor-serving commercial uses that respect and benefit from the presence of Simi Valley's natural setting and cultural resources, including the Ronald Reagan Presidential Library and Strathearn Historical Park.	**Consistent**. While the proposed project is not a visitor-serving commercial use, the proposed project would provide relocated transit-related amenities to existing surrounding commercial uses to the east and institutional uses to the south and west.
Policy LU-2.6 – **Community Services**. Provide diverse uses and services to support Simi Valley's residents, such as facilities for civic governance and administration, public safety (police), seniors and youth, community gatherings, and comparable activities. Work with external agencies to encourage the provision of services and facilities not under the City's jurisdiction, such as public schools, parks and recreation, fire protection, and quasi-public infrastructure.	**Consistent**. The proposed project would support Simi Valley's residents by providing enhanced public transportation connectivity and relocating existing bus operations along Tapo Canyon Road to a central and specialized transit hub.

Goal LU-3 – City Structure and Form. Land uses are located, designed, and scaled to respect Simi Valley's natural setting; maintain distinct and interconnected places for residents to live, shop, work, and play; and reduce automobile dependence	
Policy LU-3.2 – **Citywide Development Pattern**. Provide for an overall pattern of land uses that promotes efficient development; minimizes the impact of traffic congestion; reduces transportation distances, energy consumption, air pollution, and greenhouse gas emissions; ensures compatibility between uses; protects the natural hillsides, major watercourses, and trees; enhances community livability and public health; and sustains economic vitality.	**Consistent**. As discussed above, the proposed project would relocate existing Simi Valley Transit's bus operations along Tapo Canyon Road onto a centralized transit hub. Additionally, the facility would support a zero-emission transit fleet which would reduce energy consumption, air pollution, and greenhouse gas emissions. The existing bus shelter along Tapo Canyon Road would remain available for use by VCTC riders.
Policy LU-3.3 – **Connected Open Space Network.** Maintain and, where incomplete, develop a Citywide network of open spaces that is connected to and provides access for all neighborhoods and districts incorporating greenbelts, drainage corridors, parklands, bicycle and pedestrian paths, equestrian trails, and natural open spaces and coordinate with other agencies, such as Rancho Simi Recreation and Park District and Santa Monica Mountains Conservancy.	**Consistent**. The proposed project would introduce landscaping along the northern and southern portion of the project site.
Goal LU-4 – Development Shaped by Environmental Setting. Development is located to respect, work with, and complement the natural features of the land.	
Policy LU-4.2 – **Incorporation of Natural Features.** Integrate natural scenic features, such as mature trees, rock outcroppings, watercourses, and views into project design, except where infeasible for public safety.	**Consistent**. The proposed project would revitalize the existing vacant land by constructing a transit hub. Construction of the proposed project would ensure that eight of the existing trees are incorporated into the project design. Additionally, the proposed project would incorporate landscaping along the northern and southern portion of the project site; refer to Exhibit 3.
Policy LU-4.3 – **Open Space Character.** Locate and design structures and open space areas to assure that open space qualities of a development are generally apparent from adjoining areas.	
Goal LU-5 – Land Use Compatibility. New development is located and designed to assure a compatible relationship with adjoining uses.	
Policy LU-5.1 – **Development Compatibility.** Locate and design development to assure compatibility among land uses, addressing such elements as building orientation and setbacks, buffering, visibility and privacy, automobile and truck access, pedestrian, and bicycle circulation safety, impacts of noise and lighting, landscape quality, and aesthetics	**Consistent**. Refer to Table 2, *Civic Center Development Standards Consistency Analysis* for the project's consistency with setbacks. The proposed project would ensure development compatibility by promoting pedestrian and automobile safety. Additionally, the project would comply with landscaping requirements. All lighting on-site would be directed away from residential uses to reduce the site's impact on light-sensitive land uses.
Policy LU-5.4 – **Integration of Nonresidential Uses in Neighborhoods.** Buffer different land uses within a neighborhood from one another by walls, fences, trees, and landscaped greenbelts.	**Consistent**. Refer to consistency analysis for Policy LU-4.2 and LU-4.3.
Policy LU-5.7 – **Residential Privacy.** Respect the privacy of existing residents in the design of new development that abuts existing residential neighborhoods.	**Consistent**. Refer to consistency analysis for Policy LU-4.2, LU-4.3, and LU-5.1.
Policy LU-5.9 – **Lighting Impacts.** Design, locate, and direct lighting and signs so that they do not result in excessive spillover, illumination, and glare for adjacent uses	**Consistent**. Refer to consistency analysis for Policy LU-5.1.

Policy LU-5.11 – **Roof Equipment.** Screen all roof equipment from view from adjacent parcels and rights-of-way, especially the freeway and elevated overpasses, by means that are architecturally integrated into the structure	**Consistent**. The proposed canopy, which includes solar panels, would comply with all applicable roof equipment development standards. The project does not include any additional rooftop equipment, such as HVAC units or exhaust systems.
Policy LU-5.12 – **Signage.** Regulate signs to balance business interests and aesthetic concerns.	**Consistent**. All signage on-site would be reviewed and approved by the City to ensure aesthetics are consistent with surrounding uses.
Goal LU-6 – Open Space. Open space lands are preserved to maintain the visual quality of the City, provide recreational opportunities, protect the public from safety hazards, and conserve natural resources and wildlife.	
Policy LU-6.2 – **Mature Trees.** Continue to sustain mature trees, which are an integral part of the city's character.	**Consistent**. Refer to consistency analysis for Policy LU-4.2 and LU-4.3.
Goal LU-8 – City Sustained and Renewed. Land development practices that sustain natural environmental resources, the economy, and societal well-being for use by future generations, while reducing greenhouse gas emissions and impacts on climate change, are maintained.	
Policy LU-8.4 – **Sustainable Land Development Practices.** Promote land development practices that reduce energy and water consumption, pollution, greenhouse gas emissions, and disposal of waste materials incorporating such techniques as: a. Concentration of uses and design of development to promote walking and use of public transit in lieu of the automobile b. Capture and reuse of stormwater on-site for irrigation c. Management of wastewater and use of recycled water, including encouraging the use of grey water d. Orientation of buildings to maximize opportunities for solar energy use, daylighting, and ventilation e. Use of landscapes that protect native soil, conserve water, provide for wildlife, reduce green waste, and reduce the risk of wildfires f. Use of permeable paving materials or reduction of paved surfaces g. Shading of surface parking, walkways, and plazas h. Recycling and/or salvaging for reuse of construction and demolition debris	**Consistent**. The proposed project would promote land development practices that reduce energy consumption, pollution, and greenhouse gas emissions. As discussed, the proposed project would relocate existing bus operations into a central and specialized transit hub. Additionally, the project would incorporate solar panel canopies that would provide shade for visitors as well as generate electricity on-site which would reduce the transit hub's impact on the energy grid. The proposed project would also support a zero-emission transit fleet which would minimize impacts on air pollution and greenhouse gas. Lastly, the proposed project would incorporate landscaping on-site which would revitalize the existing vacant and barren site.
Policy LU-8.5 – **Revitalization of Obsolete and Underused Properties.** Encourage use of redevelopment tools such as the consolidation of small parcels, joint public-private partnerships, and land clearance and resale, to facilitate revitalization of underused and obsolete commercial and industrial properties.	**Consistent**. As discussed, the proposed project would revitalize the existing vacant land with a transit hub. The proposed transit hub would be designed to be compatible with surrounding uses and would also include landscaping.
Policy LU-8.10 – **Increase Urban Forestation.** Encourage and promote the retention and increased planting of trees whenever practicable as part of design for new development and renovation projects and include public education to achieve tree preservation	**Consistent**. Refer to consistency analysis for Policy LU-4.2.
Goal LU-21 – Public and Quasi-Public Uses Supporting Resident Needs. Governmental, utility, institutional, educational, recreational, cultural, religious, and social facilities and services are located and designed to complement Simi Valley's neighborhoods, centers, and corridors.	

Policy LU-21.3 – Co-Location of Community Facilities. Promote the co-location of parks, schools, libraries, health services, recreation facilities, and other community facilities to support resident needs and leverage limited resources.	**Consistent**. The proposed project has a land use designation and zoning of CC. The CC zoning district is intended to provide an area for public facilities and supportive commercial activities in a centralized location. Existing community facilities near the project site include the Simi Valley Public Library, Simi Valley Senior Center, Simi Valley City Hall, Ventura County East County Courthouse, California Department of Motor Vehicles, Rancho Tapo Community Park, and the Simi Valley Police Department. Thus, the proposed project would promote connectivity to surrounding institutional uses and community facilities.
Goal M-2 – Regional Facilities. A network of regional facilities and connections to those facilities is provided that ensure the safe and efficient movement of people and goods from within the City to areas outside its boundaries, and minimizes the use of City streets by regional through traffic.	
Policy M-2.2 – Integration of Transportation Systems with the Region. Maintain a working relationship with regional and surrounding local agencies, to implement systems that serve the needs of regional travelers in a way that minimizes impacts on Simi Valley's local street network.	**Consistent**. The proposed project would construct a transit hub that would be utilized by Simi Valley Transit. The proposed project would relocate the existing Simi Vally Transit's operations along Tapo Canyon Road onto the transit hub and construct a dedicated bus turnout. As such, the proposed project would improve the flow of traffic along Tapo Canyon and would promote pedestrian safety.
Goal M-8 – System Improvements. Safe and efficient movement of people and goods is provided within the City through the timely improvement of streets and intersections and the restriction of access along streets according to the City's street standards.	
Policy M-8.4 – Accommodate Alternative Modes. Condition discretionary development to minimize traffic impacts by incorporating sidewalks and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), transportation demand measures, and/or transit subsidies for employees or residents of the proposed development.	**Consistent**. Refer to Policy M-2.2. As discussed, the proposed project would construct a dedicated transit hub for Simi Valley Transit. The proposed transit hub would ensure pedestrian safety while improving the flow of traffic along Tapo Canyon Road due to the absence of idling buses along the roadway. The proposed project would also construct a dedicated bus turnout. The relocated bus shelter along Tapo Canyon Road would still be utilized by VCTC. Additionally, the proposed project would construct pedestrian sidewalks along Tapo Canyon Road which would provide pedestrian access to the transit hub and ensure uninterrupted pedestrian connectivity.
Goal M-11 – Transportation Demand. Single-occupant motor vehicle travel in the City and traffic impacts are reduced through Transportation Demand Management (TDM) measures that ensure efficiency of the existing transportation network and promote the movement of people instead of personal automobiles.	
Policy M-11.2 – Alternative Transportation Modes. Promote and encourage the use of alternative transportation modes, such as ridesharing, carpools, vanpools, public transit, bicycles, and walking; and provide facilities that support such alternative modes.	**Consistent**. The proposed transit hub would encourage the use of public transportation since it is located near existing institutional facilities (i.e., Simi Valley Public Library, Simi Valley Senior Center, Simi Valley City Hall, etc.). Furthermore, the proposed transit hub would relocate existing Simi Valley Transit's operations into a centralized, safe location. As discussed, the proposed project would construct eight pantographs that would be utilized by Simi Valley Transit's electric buses. As such, the proposed project would promote Simi Valley Transit eventual adoption of an electric bus fleet.

Goal M-13 – Public Transit. A safe, comprehensive, and integrated public transportation system is provided that serves as an essential component of a multi-modal mobility system, provides local and regional mobility for residents, including special transportation needs of the elderly, school children, low income, physically handicapped, and other low mobility groups, and encourages the use of public transportation as an alternative to automobile travel.	
Policy M-13.2 – Transit Design. Support a well-designed transit system to meet the mobility needs of residents and visitors including senior, disabled, and transit-dependent persons	**Consistent**. The proposed project would construct a dedicated transit hub for Simi Valley Transit designed to improve the overall function and safety of transit operations in the area. The transit hub would include ADA-accessible features and pedestrian safety improvements. Furthermore, the proposed project is located near the existing facilities that service the residents of the City, including senior, disabled, and transit-dependent persons.
Policy M-13.4 – Transit Priority Measures. Consider improvements in transit efficiency and travel times by implementing transit priority measures to help bypass congested areas, which may include transit signal priority, queue bypass lanes, and exclusive transit lanes.	**Consistent**. The proposed project would improve transit efficiency by removing idling buses from Tapo Canyon Road and consolidating bus operations within a dedicated transit hub. As such, the project would reduce conflicts between buses and general traffic flow.
Policy M-13.5 - Participate in efforts to develop transit support facilities, including park-and-ride lots, bus stops, and shelters.	**Consistent**. The proposed project would directly implement this policy by constructing a dedicated transit hub for Simi Valley Transit operations. Additionally, the relocated bus shelter along Tapo Canyon Road would remain available for use by VCTC riders, ensuring continuity of transit support facilities along the corridor.
Goal IU-6 – Reliable Energy Resources. Affordable, reliable, and environmentally sensitive energy resources are available for the City's residents and businesses.	
Policy IU-6.4 – Renewable Energy. Promote the installation and construction of renewable energy systems and facilities such as wind, solar, hydropower, geothermal, and biomass facilities where appropriate.	**Consistent**. The proposed project would construct a solar canopy that would generate electricity from solar and provide shade for passengers waiting for buses.
Policy IU-6.6 – Photovoltaic Panels for Public Projects. Satisfy some or all of the City's electrical power needs through the installation of photovoltaic panels (solar power panels). These panels could be located on parking structures and roofs.	**Consistent**. Refer to Policy IU-6.4. The proposed solar canopy would generate electricity that would be used to power the pantographs on-site.
Source: City of Simi Valley, *City of Simi Valley General Plan,* June 2012.	

Municipal Code Consistency

Civic Center (CC) Zoning

According to the *City of Simi Valley Zoning Map*, the project site is zoned as CC. Pursuant of the Simi Valley Municipal Code (SVMC) Section 9-26.020, *Purpose of Commercial and Industrial Zoning Districts*, the CC zoning district is intended to provide an area for public facilities and supportive commercial activities in a centralized location. According to SVMC Section 9-26.030, *Commercial, Industrial, Business Park Overlay, and Mixed-Use Overlay District Land Uses and Permit Requirements*, permitted uses in the CC zoning district includes but is not limited to: crop production, community centers, meeting halls, libraries, schools, social services, and post offices. As discussed, the proposed project would construct a transit center

consisting of multiple bus stops and related transit amenities, including passenger waiting areas, benches, shelters, signage, lighting, and accessibility improvements, with no permanent enclosed structures. Pursuant to SVMC Section 9-26.030, "Transit/transportation system passenger terminals" are permitted within the CC zoning district upon approval of a CUP. Thus, with approval of the required CUP, the proposed project would be consistent with the existing CC zoning designation.

Civic Center Development Standards

VMC Section 9-26.040, *Commercial and Industrial District General Development Standards*, sets forth the requirements and standards with which all new development and structures are required to comply. Table 2, *Civic Center Development Standards Consistency Analysis*, discusses the project's consistency with applicable development standards.

Table 2
Civic Center Development Standards Consistency Analysis

Development Feature	Civic Center Zoning District Requirements	Project's Consistency
Minimum Lot Size		
Area	-	**Not Applicable**. The "Minimum Lot Size" Development standards are only applicable for parcels proposed in a new subdivision. The proposed project would not require the subdivision of an existing parcel.
Width	-	
Setbacks		
Front and Street Side	100 Feet	**Consistent**. The proposed project borders Avenida Simi to the north and Tapo Canyon Road to the east. As discussed above, the proposed project would not construct any enclosed structures. As such, the proposed project would be consistent with the 100 feet front and street side setback requirements. The proposed project would construct a canopy on-site. The solar canopy would have 62 feet setback from Avenida Simi and 31 feet setback from Tapo Canyon Road. Pursuant to SVMC Section 9-30.080(D), *Setback and Separation Requirements and Exceptions*, accessory structures would comply with separate setback requirements. The proposed solar canopy would qualify as a "Gazebos, carports, sheds, and similar nonresidential structures that are freestanding" which has a minimum front setback requirement of 20 feet and street side setback requirement of three feet. As such, the proposed solar canopy would be consistent with

		the setback requirements for accessory structures. According to Table 3-2 of SVMC Section 9-30.080(D), the proposed solar canopy shall not cover more than 40% of any required yard and must include an open area in the rear yard setback, As shown in Exhibit 3, the proposed solar canopy would not cover 40% of the site and would include landscaping in the rear.
Side and Rear	None unless located adjacent to a residentially zoned parcel. If adjacent, setbacks would be 20 feet plus one additional foot for each feet the structure exceeds 20 feet in height.	**Consistent**. The proposed project would be located adjacent to a residentially zoned parcel to the north and east. The proposed project would not construct any enclosed structures and would comply with the side and rear setback requirements. As discussed above, the proposed solar canopy would be subject to setback requirements for accessory structures. The solar canopy would have 61 feet setback from Avenida Simi and 31 feet setback from Tapo Canyon Road. Pursuant to SVMC Section 9-30.080(D), the proposed solar canopy would have a minimum side and rear setback requirement of three feet. The proposed solar canopy would also have a rear setback more than three feet. As such, the proposed solar canopy would be consistent with the side and rear setback requirements
Height Limit		
Primary Structures	As Specified by the Conditional Use Permit	**Not Applicable**. The proposed project would not include the development of an enclosure structure that would be identified as a primary structure.
Accessory Structures	25 Feet	**Consistent**. The proposed canopy and/or bus shelters would have a maximum height of 21 feet and four inches.
Additional Development Features		
Minimum Landscape Coverage	25 Percent	**Consistent**. The proposed project would include the development of landscaping along the north and southwest portion of the project site. The proposed landscaping would introduce 16,131 square feet of landscaping area which represents 28 percent of the project site (1.31 acres or 57,248 square feet).
Parking[1]	One Parking Space for each 250 square feet of floor area.[2]	**Consistent**. As discussed, the proposed project would not construct a building and thus, would not propose any floor area. As such, the proposed project would not be required to

		include parking spaces. Nevertheless, the proposed project would be serviced by the existing surface parking lot to the south and west of the site, which consists of 100 parking spaces.
Roof Equipment	All roof-mounted equipment, vents, or ducts shall not be visible from any abutting lot or any street or roadway. This shall be accomplished in a manner that is architecturally integrated with the main building.	**Consistent**. The proposed canopy, which includes solar panels, would comply with all applicable roof equipment development standards. The project does not include any additional rooftop equipment, such as HVAC units or exhaust systems.

Source: City of Simi Valley, *Simi Valley Municipal Code Section 9-26.040 – Commercial and Industrial General Development Standards*, effective July 19, 2012.
Notes:
1. Pursuant to SVMC Section 9-34.050(D), *Commercial and Industrial Use Parking Standards*.
2. Floor area is defined as the measurement of the area within an enclosed structure or building.

Conclusion

As discussed above, the proposed project would be consistent with applicable General Plan policies and would be consistent with the SVMC zoning and development standards upon approval of a CUP. Thus, the proposed project would be consistent with Criterion (a).

Criterion (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses

The project site is approximately 1.31-acre site and is surrounded by existing urban uses. The project site is surrounded by single-family residential uses to the north, multi-family residential (Vintage Paseo Senior Apartments) to the east, and institutional (Simi Valley Public Library and Simi Valley City Hall) uses to the south and west. Thus, the project would occur within the City limits on a site less than five acres which is surrounded by urban uses. Thus, the project would be consistent with Criterion (b).

Criterion (c) The project site has no value as habitat for endangered, rare, or threatened species.

The following analysis is based on the *Biological Resources Technical Memorandum - Simi Valley Transit Center Project* (Biological Memorandum), prepared by BKF (dated April 2026); refer to Attachment B, *Biological Memorandum*.

The Biological Memorandum conducted literature review, record search, and reviewed available online records to identify the potential of special-status biological resources to occur in the regional vicinity of the project site. According to the Biological Memorandum, the project site does not intersect with any aquatic features and thus, the proposed project would not result in impacts to aquatic habitats or jurisdictional waters, including those potentially regulated under Section 404 of the Clean Water Act or Section 1602 of the California Fish and Game Code. Furthermore, the project site is not located within the boundaries of any federally designated critical habitat for federally listed species.

The Biological Report conducted records searches for special-status plant species on the California Natural Diversity Database (CNDDB) RareFind 5 database search, United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation Project Planning Tool (IPaC) report, and California Native Plant Society (CNPS) database search which identified 30 special-status plant species that have been reported to occur around the project site. However, none of these identified 30 special-status plant species were identified to have the potential to occur on the project site. In addition to special-status plant species, the Biological Memorandum also conducted record searches for special-status wildlife and identified 35 special-status wildlife species that have been reported to occur around the project site. The Biological Memorandum made a potential habitat use determination on the project site for each of the 35 special-status wildlife species based on aerial imagery and a literature review of the project site (i.e. vegetative communities and land covers, current site conditions, soils, range and habitat preference of each species' known, and relative distribution known for each species). One species, the Crotch's bumble bee (*Bombus crotchii*; a California Species of Special Concern [SCC]), has the potential to occur on the project site. Thus, as part of a Condition of Approval (COA), the proposed project would conduct focused Crotch's bumble bee surveys in accordance with the California Department of Fish and Wildlife's (CDFW) *Survey Considerations for CESA Candidate Bumble Bee Species* the season prior to the start of ground disturbing activities; refer to Attachment B for the full requirements under the COA.

As discussed above, the project site has mature trees on-site and thus provides marginal nesting habitat for year-round and seasonal avian residents as well as migrating songbirds. Nesting birds and raptors are protected pursuant to the federal Migratory Bird Treaty Act (MBTA) of 1918 and the California Fish and Game Code (CFGC). To maintain compliance with the MBTA and CFGC, clearance surveys are typically required prior to any ground disturbance or vegetation removal activities to avoid direct impacts to active bird nests and/or nesting birds. Thus, as part of a COA, the proposed project would conduct pre-construction nesting bird clearance surveys if activities are initiated during nesting season (February 1st to August 31st). The pre-construction nesting bird clearance surveys would be conducted no more than three days prior to vegetation removal or ground disturbing activities; refer to Attachment B for the full requirements under the COA.

Thus, upon compliance with existing regulations and incorporation of COAs, the proposed project would have less than significant impacts on biological resources.

Criterion (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality

Traffic

According to the City's *Guidelines for the Preparation of Traffic Impact Reports*, a traffic impact report is required if a trip generation from a proposed project exceeds the existing site trip generation by at least 110 daily trips. As discussed, bus operations currently exist around the project site, and the proposed project would relocate existing, nearby bus operations into a central and specialized transit hub. Additionally, the project would not introduce new transit services or expand the number of buses operating in the area. Furthermore, the proposed project would not alter existing roadway capacities that would indirectly impact

trip generation. Since the proposed project would include bus activities that would be consistent of the current operation of the bus stop along Tapo Canyon Road, no net increase in transit-related activities would occur. As such, the proposed project would not increase the existing site trip generation by at least 110 daily trips and thus, the proposed project would not result in significant traffic impacts.

Noise

The noise analysis herein would utilize Section XIII of Appendix G to the State CEQA Guidelines to determine if the proposed project would result in significant noise impacts. Section XIII of Appendix G to the State CEQA Guidelines includes the following threshold questions to evaluate the project's potential noise impacts. Would the project:

a. *Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Construction

Construction of the proposed project would result in noise that may intermittently dominate the existing noise environment near the immediate vicinity of construction activities. Typically, construction noise is characterized as short-term, intermittent, varying in intensity. Noise levels associated with construction activities would vary depending on the construction phase (i.e., demolition, grading, paving, etc.), quantity of equipment, equipment type, and duration of equipment use. However, construction noise would only be present during the development of the project and would cease upon the completion of all construction activities.

Noise sensitive receptors are identified as land uses or locations with occupants who are adversely affected by excessive noise. Generally, sensitive receptors are identified as a location where human population (especially children, senior citizens, and sick individuals) are present for long periods of time. Sensitive receptors typically include, but are not limited to, residential dwellings, schools, childcare facilities, hospitals, libraries, places of worship, and parks. The nearest residential receptor to the project site is approximately 50 feet to the north when measured from the project site boundary to the property line. Additionally, the Simi Valley Public Library is also located approximately 50 feet to the west of the project site when measured from the project site boundary to the property line.

According to the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*, sites with multiple and variable noise sources are difficult to quantify.[3] Therefore, the FTA recommends that noise be conservatively assumed to be concentrated at the center of the site. Since roadway improvements and construction of the proposed project (transit hub) are located adjacent to

[3] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 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, adopted September 2018.

each other, the following evaluation would consider them as a single entity. Consistent with this guidance, the following evaluation assesses construction-related noise impacts based on the distance from the center of the construction site to the property line of the nearest noise-sensitive receptor. When measured from the center of the construction site to the receptor's property line, both the Simi Valley Public Library and the nearest residential properties to the north are located approximately 125 feet away. Therefore, the subsequent construction noise analysis utilizes this distance of approximately 125 feet, consistent with FTA guidance.

Noise from the operation of construction equipment was modeled using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM). The construction equipment list used in RCNM was based on the California Emissions Estimator Model (CalEEMod) results for the proposed project; refer to Attachment D, *Air Quality Data*. Table 3, *Construction Noise Levels at Sensitive Receptors* presents the projected construction noise levels associated with the proposed project. To provide a conservative analysis, the RCNM results presented in Table 3 were modeled assuming a clear line of sight between the construction activity and the sensitive receptor, as well as the simultaneous operation of construction equipment.

Table 3
Construction Noise Levels at Sensitive Receptors

Construction Phase	Estimated Construction Noise Level at 125 Feet (Center of the Project Site to the Property Line of the Residential Receptor to the North) (dBA L_{eq})[1]
Site Preparation	75.9
Grading	75.7
Building Construction	73.9
Paving	73.7

Source: Federal Highway Administration, *Roadway Construction Noise Model (RCNM),* 2006. Refer to Attachment C, *Noise Data* for noise data results.
Notes: dBA L_{eq} = Average A-Weighted Sound Energy – Equivalent Continuous Sound Level
1. These noise levels conservatively assume the simultaneous operation of all heavy construction equipment at the same location. Modeled heavy equipment list in RCNM was based on the CalEEMod results for the proposed project.

The City has not established a quantitative noise threshold applicable to active construction sites. Therefore, to evaluate whether the proposed project could result in potentially significant temporary construction noise impacts at off-site sensitive receptor locations, a construction noise threshold based on the Occupational Noise Exposure criteria developed by the National Institute for Occupational Safety and Health (NIOSH) was applied. NIOSH, a division of the U.S. Department of Health and Human Services, identifies a noise level threshold based on the duration of exposure to the source. The construction-related noise level threshold starts at 85 A-weighted decibel (dBA) for more than eight hours per day, and for every 3-dBA increase, the exposure time is cut in half. For the purposes of this analysis, the lowest, most conservative construction noise level threshold of 85 dBA equivalent continuous sound level (L_{eq}) over a period of eight hours or more was used as an acceptable threshold for construction noise at the nearby sensitive receptor locations. As shown in Table 3, the nearest residential receptor would be exposed to temporary construction noise ranging from approximately 73.7 to 75.9 dBA L_{eq}. Thus, construction-related noise would not exceed the applicable NIOSH noise threshold of 85 dBA L_{eq}.

Pursuant to SVMC Section 5-16.02(i), *Unlawful acts; Public nuisances*, construction is only permitted between the hours of 7:00 a.m. to 7:00 p.m. unless otherwise authorized by the City Engineer. Project-related construction activities would be limited to the permitted hours. As such, the proposed project would not require approval of alternative construction hours and would not result in excessive construction noise. Thus, impacts would be less than significant in this regard.

Operation

As discussed, the proposed project would construct a central and specialized transit hub. Existing bus operations currently occur to the east of the project site. The proposed project would not introduce new transit services but would relocate these existing operations on-site. As a result, the project would not increase traffic volumes, vehicle trips, or daily trip counts beyond existing conditions. Additionally, the proposed transit hub would not relocate bus operations closer to sensitive receptors to the north and east. Because bus activity would remain consistent with current operations and no net increase in transit-related activity would occur, project-related noise levels would not substantially increase at these sensitive receptors.

However, the proposed project would construct a transit hub near the Simi Valley Public Library, resulting in bus operations in closer proximity to sensitive receptors within the library. When idling, buses generate noise levels of approximately 76 dBA at three feet from the source.[4] As discussed, the Simi Valley Public Library is located approximately 50 feet away from the project site boundary. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the source. At a distance of 50 feet, noise from idling buses from the project site would be approximately 53 dBA. According to the City's General Plan, commercial and institutional uses, including libraries, do not have an established exterior noise standard.[5] In the absence of an applicable exterior noise standard, the predicted noise level of 53 dBA from idling buses is not anticipated to substantially increase ambient noise levels or result in a significant noise environment for library patrons. Therefore, noise impacts would be less than significant in this regard.

According to SVMC Section 5-16.02(d), audible sound from engines, motors, and mechanical devices within 10 feet of any residences are prohibited between the hours of 11:00 p.m. and 7:00 a.m. on Friday or Saturday and between the hours of 10:00 p.m. and 7:00 a.m. on Sunday through Thursday. As discussed, the proposed project would construct a relocated transit hub that would support the existing bus routes serviced by Simi Valley Transit. Currently, Simi Valley Transit operates its fixed-route bus services between the hours of 5:30 a.m. to 8:00 p.m. on Monday through Saturday.[6] Thus, the proposed transit hub would operate outside the permitted hours outlined in SVMC Chapter 16. Nevertheless, as discussed above, the nearest residential dwelling are the existing single-family homes located

---

4 Elliot H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 26, 2015.

5 City of Simi Valley, *City of Simi Valley General Plan, Table N-2 Interior and Exterior Noise Standards*, June 2012.

6 City of Simi Valley, *Simi Valley Transit*, https://www.simivalley.org/departments/public-works/simi-valley-transit, accessed February 9, 2026.

approximately 50 feet to the north of the project site. Additionally, traffic noise along Avenida Simi located between the project site and the sensitive receptors to the north would mask the noise generated on the project site. Thus, since vehicular-related noise from the proposed project would be located in excess of 10 feet from existing residential uses, impacts would be less than significant in this regard.

b. Generate excessive groundborne vibration or groundborne noise levels?

Construction

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s).

The following assessment is based on guidance contained within the Caltrans' *Transportation and Construction Vibration Guidance Manual*.[7] To assess the adverse impacts from groundborne vibration from construction activities, Caltrans provided various vibration criteria for structural damage and human annoyance. The nearest sensitive structures to the project site are the Simi Valley Public Library and single-family residential dwellings, located approximately 50 feet to the west and 75 feet to the north, respectively, when measured from the project site boundary to the building façades. Due to the differing structure types, the following evaluation would utilize the Caltrans "older residential structures" vibration significance criteria of 0.3 peak particle velocity (PPV) inches per second (in/sec) threshold for the single-family residential uses to the north and the "modern industrial/commercial buildings" vibration significance criteria of 0.5 PPV in/sec threshold for the Simi Valley Public Library to the west. Vibration levels from typical equipment used during the construction activities are shown in Table 4, *Construction Vibration Levels*.

Table 4
Construction Vibration Levels

Equipment	PPV at 25 feet (in/sec)	PPV at 50 feet (in/sec)	PPV at 75 feet (in/sec)
Vibratory Rollers	0.21	0.098	0.063
Large Bulldozer	0.089	0.042	0.027
Loaded Trucks	0.076	0.035	0.023
Jackhammer	0.035	0.016	0.010
Small Bulldozer	0.003	0.001	0.001

Source: Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*, Table 7-5, 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, accessed February 10, 2026.
Notes: PPV = Peak Particle Velocity; in/sec = inch per second
1. Calculated using the following formula:
   a. $PPV_d = PPV_{ref} \times (25/D)^{1.1}$

[7] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, April 2020.

b. Where: PPV_d = PPV adjusted for the distance; PPV_{ref} = reference vibration level; D = Distance from equipment to receiving structure

As shown in Table 4, construction equipment associated with the development of the proposed project would generate vibrations ranging from 0.001 to 0.098 PPV in/sec at 50 feet and 0.001 to 0.063 PPV in/sec at 75 feet. Construction of the proposed project would include the pavement of new asphalt and concrete surfaces which may require the use of vibratory rollers. However, as shown in Table 4, the use of such vibration intensive equipment would not have the potential to exceed applicable Caltrans vibration significance criteria. Thus, construction associated with the proposed project would not exceed the Caltrans vibration significance criteria of 0.3 PPV in/sec for "older residential structures" or the 0.5 PPV in/sec for "modern industrial/commercial buildings". As such, construction impacts would be less than significant in this regard.

Operation

The proposed project would not introduce new land uses, equipment, facilities, or activities that would generate substantial vibrations. According to the Federal Transit Administration's *Transit Noise and Vibration Impact Assessment*, it is unusual for buses and trucks to generate vibrations that are perceptible at locations close to major roads.[8] As such, the proposed project would not result in any operational vibration impacts and operational impacts would be less than significant in this regard.

c. *For a project located within the vicinity of a private airstrip or 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, would the project expose people residing or working in the project area to excessive noise levels?*

The closest airport to the project site is the Van Nuys Airport located approximately 14.3 miles to the southeast. According to the Los Angeles World Airports *California State Airport Noise Standards Quarterly Report, Van Nuys Airport 3Q25*, the project site is not located within the Van Nuys Airport's noise contours.[9] As such, the proposed project would not expose any receptors or workers to excessive noise levels from aircraft. Thus, no impact would occur.

Air Quality

The air quality analysis herein would utilize Section VIII of Appendix G to the State CEQA Guidelines to determine if the proposed project would result in significant air quality impacts. Section VIII of Appendix G to the State CEQA Guidelines includes the following threshold questions to evaluate the project's potential air quality impacts. Would the project:

---

8 Federal Transit Administration, *Transit Noise and Impact Assessment*, adopted September 2018.

9 Los Angeles World Airports, *California State Airport Noise Standards Quarterly Report, Van Nuys Airport 3Q25*, https://www.lawa.org/sites/lawa/files/2025-12/VNY%203q25_%2020251124_Quarterly%20Report%20Map.pdf, accessed February 9, 2026.

a. *Conflict with or obstruct implementation of the applicable air quality plan?*

The project site is located within the South Central Coast Air Basin which is currently governed by the Ventura County Air Pollution Control District (VCAPCD). The VCAPCD adopted the *2022 Air Quality Management Plan* (2022 AQMP) on December 13, 2022, which combines State and local strategies to achieve and maintain State and federal air quality standards. According to the VCAPCD's *Ventura County Air Quality Assessment Guidelines* (Air Quality Guidelines), a project would be consistent with the 2022 AQMP if the population growth of the City is consistent with the projected growth rate contained within the 2022 AQMP, if the proposed project is consistent with the land use designation for the site, and if the project would not exceed applicable VCAPCD thresholds for reactive organic compounds (ROG) and nitrogen oxides (NO_x).[10] As part of the 2022 AQMP, the report incorporated planning assumption and technical data from various agencies and their corresponding documents such as the Southern California Association of Governments (SCAG) *2020-2045 Regional Transportation Plan/Sustainable Community Strategy* (RTP/SCS) and the *Demographics and Growth Forecast*.[11,12] While SCAG has adopted the *2024-2050 Regional Transportation Plan/Sustainable Community Strategy* (Connect SoCal 2024), the VCAPCD has not adopted a new AQMP that incorporates technical data and planning assumptions from the Connect SoCal 2024.

Nevertheless, as discussed above, the proposed project would construct a new transit hub that would relocate existing bus stops along Tapo Canyon Road. Since the project is not a residential project, the proposed transit hub would not result in direct population growth within the City. In addition, the project would not expand Simi Valley Transit's existing bus routes and therefore would not generate new employment. Furthermore, the project site is zoned and designated as Civic Center and upon approval of a CUP, the proposed transit hub would be consistent with the site's land use designation and zoning. Lastly, as discussed herein, the proposed project would not exceed applicable VCAPCD thresholds; refer to Table 5, *Daily Construction Emissions*. Accordingly, since the project is consistent with the City's growth projections, applicable land use designations and zoning, and would not exceed applicable VCAPCD thresholds, the proposed transit hub would be consistent with the 2022 AQMP. Impacts would be less than significant in this regard.

b. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

According to the Air Quality Guidelines, the VCAPCD determined that a proposed project that emits more than 25 pounds of ROG (also known as volatile organic compounds) or NO_x per day would

---

[10] Ventura County Air Pollution Control District, *Ventura County Air Quality Assessment Guidelines*, https://www.vcapcd.org/wp-content/uploads/pubs/Planning/VCAQGuidelines.pdf, adopted October 2003.

[11] Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, https://scag.ca.gov/sites/default/files/2024-05/0903fconnectsocal-plan_0.pdf, adopted September 3, 2020.

[12] Southern California Association of Governments, *Demographic and Growth Forecast*, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf, adopted September 3, 2020.

individually and cumulatively jeopardize attainment of the federal one-hour ozone standards. Exceedance of the established threshold would indicate that a project would have a significant adverse impact on air quality within Ventura County.

Construction

Construction of the proposed project would generate short-term emissions of criteria air pollutants through the operation of off-road construction equipment. To quantify the projected emissions associated with construction activities, the following evaluation would utilize outputs from CalEEMod version 2022.1.1.37. To present a more conservative analysis, CalEEMod modeled a 1.37 acre site which presents a more conservative model since the project site is 1.31 acres. Since the project is currently in the preliminary planning phase, the specific construction duration and scope of earthwork are not yet defined. Nevertheless, the following analysis conservatively assumes that construction would occur over a period of one year starting in 2027 and earthwork would be balanced on-site. Furthermore, roadway improvements and the construction of the proposed project (transit hub) would be modeled to occur simultaneously. Additionally, the equipment list and construction trips were based on CalEEMod defaults for the site. Table 5, *Daily Construction Emissions* displays the projected daily emissions from construction activities.

Table 5
Daily Construction Emissions

Construction Year	Construction Pollutants (Pounds per Day)[1,2]					
	ROG/VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
2027	1.43	13.80	14.76	0.03	2.85	1.52
VCAPCD Thresholds	**25**	**25**	-	-	-	-
Thresholds Exceeded?[3]	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

Source: Refer to Attachment D for detailed CalEEMod outputs.
Notes: ROG = Reactive Organic Gases/Volatile Organic Compounds; NO_x = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM_{10} = Particulate Matter < 10 microns; $PM_{2.5}$ = Particulate Matter < 2.5 microns
1. The higher emission between summer and winter was utilized as a conservative analysis.
2. Modeling assumes compliance with VCAPCD Rule 55 which requires the watering of exposed surfaces. Compliance with VCAPCD Rule 55 only affects PM_{10} and $PM_{2.5}$ outputs.
3. The VCAPCD only has established thresholds for ROG and NO_x.

As shown in Table 5, construction activities would not exceed the established VCAPCD thresholds for NO_x or ROG. Thus, since the proposed project would not exceed VCAPCD thresholds, the project would not individually and cumulatively jeopardize the attainment of the federal one-hour ozone standards. Thus, construction impacts would be less than significant in this regard.

Operation

Operation of the proposed transit hub would not result in a cumulatively considerable net increase of any pollutant criteria for which the project region is designated non-attainment. The project would relocate existing bus operations into a centralized transit hub and would not introduce new bus routes,

increase service frequency, or expand the existing fleet. Additionally, the proposed project would not construct any enclosed structures that would use equipment (i.e., heating, ventilation, air conditioning, etc.) that would directly emit emissions. Thus, operational activities associated with the proposed project which include bus operations and idling, would be comparable to existing conditions.

Since the proposed project would not increase vehicle trips, traffic volumes, or transit operations beyond current levels, it would not generate emissions that would have the potential to exceed VCAPCD's thresholds for ROG and NO_x. Operational emissions would therefore be similar to existing baseline conditions and would not contribute to a cumulatively considerable net increase of any non-attainment pollutant. Accordingly, the proposed project would be consistent with applicable federal and State ambient air quality standards, and impacts would be less than significant.

c. *Expose sensitive receptors to substantial pollutant concentrations?*

Construction

Construction activities would involve the operation of diesel-powered equipment, which would emit diesel particulate matter (DPM), which is identified as a toxic air contaminant by California Air Resource Board. Construction of the proposed project would be required to comply with California Code Regulations (CCR), Title 13, Sections 2449(d)(3) and 2485, to minimize the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. Implementation of these regulations would reduce the amount of DPM emissions from the construction of the Project. Furthermore, cancer health risks associated with exposures to DPM typically are associated with chronic exposure, in which a 30-year exposure period often is assumed. Project construction would last for approximately one year, which is well below the 30-year exposure period. In addition, although construction activities could occur close to the property lines of nearby residential uses, such activities would only occur for a few days near each residence. Upon compliance with applicable CCR regulations, construction impacts would be less than significant.

Operation

VCAPCD identified that projects that emit toxic air contaminants (TACs) may result in adverse impacts on nearby populations. Appendix D of the Air Quality Guidelines includes common sources and operations that have the potential to emit toxic air contaminants. As a relocated transit hub, the proposed project would not include any operations that are identified in Appendix D of the Air Quality Guidelines. Thus, the proposed project would not have the potential to emit substantial TACs and impacts would be less than significant in this regard.

San Joaquin Valley Fever

According to the Air Quality Guidelines, there is no recommended threshold in determining if a project would result in significant San Joaquin Valley Fever impact. Nevertheless, the Air Quality Guidelines included various factors that may result in San Joaquin Valley Fever such as disturbance of topsoil of

undeveloped land, undisturbed land in non-urban areas, non-native population, etc. While the proposed project would disturb vacant and undeveloped land, the proposed project would comply with VCAPCD Rule 55 which requires the replacement of ground cover in disturbed areas, watering of exposed surfaces, limiting speed on unpaved roads, etc. Compliance with VCAPCD Rule 55 would ensure that fugitive dust emission from construction activities is minimized. Additionally, the project site is located within an urbanized and built-out area of the City. Thus, impacts would be less than significant in this regard.

Carbon Monoxide Hotspots

Carbon monoxide hotspots typically occur at congested intersections or roadway segments where traffic volumes are high and vehicle idling is substantial. The proposed project would not increase traffic volumes and would improve traffic flow, as it would relocate existing bus operations without adding new routes or generating additional vehicle trips. Because the project would not result in an increase in traffic or congestion at nearby intersections or roadways, it would not create conditions that could lead to localized carbon monoxide concentrations exceeding applicable ambient air quality standards. Therefore, the proposed project would not result in the formation of carbon monoxide hotspots, and impacts would be less than significant.

d. *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Construction

Construction of the proposed project may generate odors due to the exhaust emission from construction equipment and painting activities. However, construction of the proposed project would be temporary and would cease upon construction completion. Additionally, CCR, Title 13, Sections 2449(d)(3) and 2485 would require that equipment operators minimize the idling time of construction equipment. Furthermore, VCAPCD Rule 74.2 would require that volatile organic compounds (VOC) contents of paint to not exceed 50 grams per liter. Upon compliance with existing regulations, construction impacts pertaining to odors would be less than significant.

Operation

According to the Air Quality Guidelines, facilities and operations associated with odor complaints typically include wastewater treatment facilities, landfills, fiberglass facilities, food processing facilities, feed lots, chemical manufacturing, etc. The proposed transit hub was not identified as a facility or operation that would generate odors that would adversely affect nearby sensitive land uses (residences, schools, daycare, etc.). Thus, operation of the proposed project would not generate substantial odors and impacts would be less than significant in this regard.

Water Quality

The following analysis is based on the *Hydrology and LID Report for Simi Valley Transit Center 2929 Tapo Canyon Road Simi Valley, CA 93063* (Hydrology Report), prepared by Huitt-Zollars, Inc. (dated October 24, 2025); refer to Attachment E, *Hydrology Report*.

According to the Hydrology Report, the project site is divided into three drainage areas, with existing runoff flowing toward a catch basin along Tapo Canyon Road. The proposed project would introduce approximately 0.96 acres of new and replaced impervious surfaces, which would increase stormwater runoff. However, the project would be subject to the Los Angeles Regional Water Quality Control Board's Municipal Separate Storm Sewer System (MS4) Permit, which requires new development and redevelopment projects to minimize stormwater pollution associated with land development. Additionally, the County of Ventura would require that proposed redevelopment to develop 2,500 cubic feet of stormwater detention for every developed acre. Furthermore, the City requires that proposed redevelopment to develop 1,000 cubic feet of stormwater detention for every developed acre. Existing and proposed runoff from 10- and 100-year storm events are shown in Table 6, *Existing and Future Runoff Volumes*.

Table 6
Existing and Future Runoff Volumes

Drainage Area	Proposed Stormwater Runoff Design Volume (AF)[1]	10-Year Storm Event Runoff (cfs)[2]	10-Year Storm Event Runoff (cfs)[2]
Existing Conditions			
Sub-Area 1	-	1.36	2.31
Sub-Area 2	-	0.41	0.58
Sub-Area 3	-	0.26	0.54
Total Site	**-**	**2.03**	**3.43**
Proposed Conditions			
Sub-Area 1	0.20	1.36	2.31
Sub-Area 2	0.02	0.19	0.27
Sub-Area 3	0.04	0.40	0.56
Total Site	**0.25**	**1.95**	**3.14**

Sources: Huitt-Zollars, Inc., *Hydrology and LID Report for Simi Valley Transit Center 2929 Tapo Canyon Road Simi Valley, CA 93063,* October 24, 2025; refer to Attachment E.
Notes: AF = acre feet; cfs = cubic feet square
1. Stormwater Runoff Design Volume does not apply to existing conditions.
2. Stormwater Runoff Design Volume are subtracted from the proposed 10- and 100-year storm event since the design would allow for stormwater detention on-site.

As shown in Table 6, the proposed project would not result in an increase of stormwater flow rates from the implementation of the proposed project. Thus, the proposed project would not result in significant water quality impacts.

Criterion (e) The site can be adequately served by all required utilities and public services

The proposed transit center would be adequately served by all required utilities and public services. The project would consist of bus stops and related transit amenities and would not include the construction of permanent structures or facilities requiring new or expanded utility infrastructure. Electrical services for operational needs, such as lighting, electrical bus chargers, or signage, would be provided through existing infrastructure, and no new water, wastewater, or natural gas connections would be required. Public services, including police, fire protection, and emergency medical services, are already provided to the project area and would continue to serve the site without the need for additional facilities or staffing. Because the proposed project would not include residential or employment-generating uses, it would not result in population growth and, therefore, would not affect public services such as schools, libraries, or parks. As such, the proposed project would not result in the need for expanded utilities or public services.

5 STATE CEQA GUIDELINES SECTION 15300.2 - EXCEPTIONS

The following analysis shows there are no exceptions to qualifying for the Categorical Exemption, as identified in State CEQA Guidelines Section 15300.2. This section documents that none of the exceptions in State CEQA Guidelines Section 15300.2(a) through (f) would disqualify the project from being found categorically exempt. As described below, use of a categorical exemption Class 32 Subsection 15332 to cover the proposed project would not meet any of the exception criteria. This section includes a discussion of the project in consideration of 15300.2 (a) through (f).

Exception Criterion (a) ***Location - Categorical exemption "Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies."***

The proposed project qualifies for a Class 32 Categorical Exemption pursuant to State CEQA Guidelines Section 15332. Since the proposed project is not proposing a Class 3, 4, 5, 6, or 11 Categorical Exemption, Exception Criterion (a) would not apply.

Exception Criterion (b) ***Cumulative Impact - All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.***

According to the City's *Development Summary* dated December 9, 2025, a total of 40 projects within the City limits are currently under review, have been recently approved, or are under construction.[13] The closest identified project to the proposed project is the Habitat for Humanity project located at 3802 Avenida Simi, approximately 0.14 miles west of the project site. The Habitat for Humanity project proposes the construction of ten single-family residences.

---

[13] City of Simi Valley, *City of Simi Valley Development Summary*, https://www.simivalley.org/home/showpublisheddocument/30880/639010475354630000, December 9, 2025.

As discussed above, the proposed project would construct a transit center and related amenities. This type of development is typically associated with institutional land uses. Since the closest identified cumulative project is a residential development, no successive project of the same type and same place would occur. Additionally, the proposed project would be consistent with applicable General Plan land use policies and would not have potentially significant impacts on the environment. Therefore, the proposed project would not result in cumulative considerable impacts. All future projects would be required to comply with existing local, State and Federal regulations to ensure environmental impacts are minimized. Thus, the proposed project's impacts are not cumulatively considerable, and Exception Criterion (b) would not apply.

Exception Criterion (c) ***Significant Effect - A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.***

As discussed herein, the construction of the proposed project would not result in significant environmental impacts. Additionally, operation of the transit hub would be similar to existing conditions since the project would relocate Simi Valley Transit's operations onto the project site. The existing, nearby bus stop along Tapo Canyon Road would be relocated due to the proposed bus turnout. The relocated bus stop would still be used to service VCTC routes. As discussed, the proposed transit hub would support the use of a zero-emission transit fleet which would help reduce the Simi Valley Transit's environmental impact. Additionally, while the project site has been historically vacant, the site has a land use designation and zoning of CC which permits the construction and operation of a transit hub upon approval of a CUP. The site is not located in an environmentally sensitive area and would not result in adverse impacts on biological resources, air quality, traffic, noise, or hazardous materials. As such, the proposed project would not result in any significant effects on the environment due to unusual circumstances and Exception Criterion (c) would not apply.

Exception Criterion (d) ***Scenic Highways - A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.***

According to the Caltrans *State Scenic Highway Map* interactive map, there are no designated state scenic highways near the project site. The project site is located approximately 0.52 miles north of the closest state scenic highway, California State Route 118. The segment of California State Route 118 within the City is designated as an eligible state scenic highway. Nevertheless, since the proposed project would not damage any scenic resources within a designated state scenic highway, exception Criterion (d) under State CEQA Guidelines Section 15300.2(d) does not apply to the proposed project.

Exception Criterion (e) ***Hazardous Waste Sites - A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.***

Based on a desktop review search conducted with the Department of Toxic Substances EnviroStor database and the State Water Resources Control Board GeoTracker database, no sites were identified on the project site that presented a potential environmental risk or were included in a list compiled pursuant to Section 65962.5 of the Government Code.[14],[15] Prior to construction, a health and safety plan would be prepared for construction activities to ensure worker safety and compliance with existing State and federal laws regarding exposure to hazardous materials. Therefore, potential impacts from hazardous materials are less than significant, and Exception Criterion (e) would not apply.

Exception Criterion (f) ***Historical Resources - A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.***

Based on records search request from the South Central Coastal Information Center, the project site does not contain any identified historical resources. A historical resource was located within a quarter mile of the project site, however, construction activities would be confined to the project site and would not extend beyond the project boundaries. Therefore, construction activities would not adversely affect the nearby historical resource.

Furthermore, for a resource to qualify for listing in the California Register of Historical Resources, it must satisfy one or more of the following eligibility criteria:[16]

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed, the proposed project would develop an existing vacant site with a transit center. The existing site does not meet any of the following eligibility criteria and thus, would not qualify as a historical resource. As such, there are no historical resources that would be impacted during construction, and the project would not cause a substantial adverse change in the significance of a historical resource.

---

[14] Department of Toxic Substances Control, *EnviroStor Map online database*, https://envirostor.dtsc.ca.gov/public/map/, accessed February 10, 2026.

[15] State Water Resources Control Board, *GeoTracker online database*, https://geotracker.waterboards.ca.gov/map/, accessed February 10, 2026.

[16] California State Park, *California Register of Historical Resources*, https://ohp.parks.ca.gov/?page_id=21238, accessed February 26, 2026.

6 CONCLUSION

The project has been reviewed in compliance with CEQA. Pursuant to State CEQA Guidelines Section 15300.2, the project is categorically exempt from CEQA as Class 32 In-Fill Development Projects. No mitigation measures are required for the project.

Please do not hesitate to contact me at (760) 638-2066 or Emily.Elliott@bkf.com should you have any questions or require further information.

Sincerely,

BKF, Inc.

Emily Elliott, AICP

Practice Lead – Community Planning

REFERENCES

1. California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, April 2020.
2. California State Park, *California Register of Historical Resources*, https://ohp.parks.ca.gov/?page_id=21238, accessed February 26, 2026.
3. City of Simi Valley, *City of Simi Valley Development Summary*, https://www.simivalley.org/home/showpublisheddocument/30880/639010475354630000, December 9, 2025.
4. City of Simi Valley, *City of Simi Valley General Plan,* June 2012.
5. City of Simi Valley, *City of Simi Valley General Plan Land Use Map*, https://www.simivalley.org/home/showpublisheddocument/24714/638827537735600000, revised May 13, 2025.
6. City of Simi Valley, *City of Simi Valley Zoning Map*, https://www.simivalley.org/home/showpublisheddocument/29990/638987202218800000, revised November 14, 2025.
7. City of Simi Valley, *Simi Valley Transit*, https://www.simivalley.org/departments/public-works/simi-valley-transit, accessed February 9, 2026.
8. Department of Toxic Substances Control, *EnviroStor Map online database*, https://envirostor.dtsc.ca.gov/public/map/, accessed February 10, 2026.
9. Elliot H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 26, 2015.
10. Federal Transit Administration, *Transit Noise and Impact Assessment*, adopted September 2018.
11. Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 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, adopted September 2018.
12. Huitt-Zollars, Inc., *Hydrology and LID Report for Simi Valley Transit Center 2929 Tapo Canyon Road Simi Valley, CA 93063,* October 24, 2025.
13. Los Angeles World Airports, *California State Airport Noise Standards Quarterly Report, Van Nuys Airport 3Q25*, https://www.lawa.org/sites/lawa/files/2025-12/VNY%203q25_%2020251124_Quarterly%20Report%20Map.pdf, accessed February 9, 2026.
14. MNS Engineers, Inc., *Biological Resources Technical Memorandum, Simi Valley Transit Center Project*, April 2026.
15. Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, https://scag.ca.gov/sites/default/files/2024-05/0903fconnectsocal-plan_0.pdf, adopted September 3, 2020.
16. Southern California Association of Governments, *Demographic and Growth Forecast*, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf, adopted September 3, 2020.
17. State Water Resources Control Board, *GeoTracker online database*, https://geotracker.waterboards.ca.gov/map/, accessed February 10, 2026.

18. Ventura County Air Pollution Control District, *Ventura County Air Quality Assessment Guidelines*, https://www.vcapcd.org/wp-content/uploads/pubs/Planning/VCAQGuidelines.pdf, adopted October 2003.