



# CITY OF SIMI VALLEY

*Home of The Ronald Reagan Presidential Library*

## NOTICE OF PUBLIC HEARING

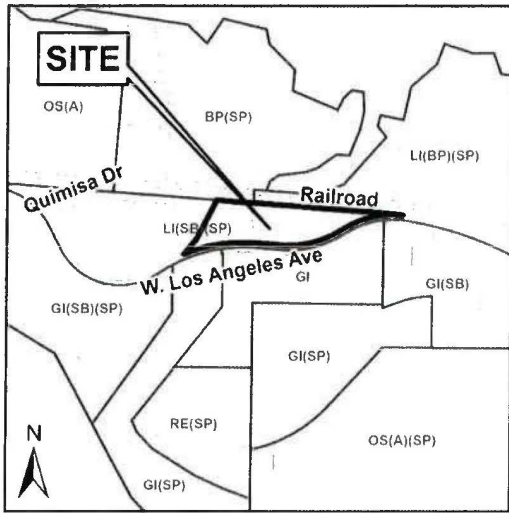
BY THE PLANNING COMMISSION OF THE CITY OF SIMI VALLEY TO CONSIDER A CONDITIONAL USE PERMIT (CUP-S-2023-0004) TO CONSTRUCT A 66,431-SQUARE-FOOT INDUSTRIAL TILT-UP BUILDING ON A 7.67-ACRE VACANT SITE FOR WAREHOUSING AND MANUFACTURING OF BAKERY INGREDIENTS LOCATED AT 615 WEST LOS ANGELES AVENUE AND NOTIFICATION OF THE RELEASE FOR PUBLIC REVIEW OF, AND INTENT TO ADOPT, A MITIGATED NEGATIVE DECLARATION FOR THE SUBJECT APPLICATION.

**NOTICE IS HEREBY GIVEN that a Public Hearing**, as provided by law, will be held by the Planning Commission of the City of Simi Valley to consider the application of Walter Postelwait, On the Rise Properties, LLC, for Conditional Use Permit (CUP-S-2023-0004), that the Mitigated Negative Declaration (MND) for this project is available for public review, and that the City proposes to adopt the Mitigated Negative Declaration.

The project will construct a 66,431-square-foot industrial tilt-up building on a 7.67-acre vacant site for warehousing and manufacturing of bakery ingredients located at 615 West Los Angeles Avenue

Based upon the results of the Initial Study prepared for the project, it has been determined that although the proposed project could have a significant effect on the environment, the incorporation of mitigation measures would bring these effects to less than significant. Therefore, a Mitigated Negative Declaration has been prepared and the public review period will be from July 3, 2024 through August 1, 2024. The MND and Initial Study are available for public review at [www.simivalley.org/CEQA](http://www.simivalley.org/CEQA); the Department of Environmental Services, 2929 Tapo Canyon Road; and at the Simi Valley Public Library, 2969 Tapo Canyon Road. Copies of the studies cited in the Initial Study can be reviewed at the Department of Environmental Services, 2929 Tapo Canyon Road. Copies of the staff report will be available at the above addresses three days prior to the Public Hearing.

If you challenge the Planning Commission's decision in court, you may be limited to raising only those issues you or someone else raised at the Public Hearing described in this notice.



The Public Hearing will be held at City Hall Council Chambers, 2929 Tapo Canyon Road, Simi Valley, California on August 7, 2024, at 6:30 p.m. At that time, any interested person is welcome to attend and be heard on this matter.

SEAN GIBSON  
Deputy Environmental Services  
Director/City Planner  
Department of Environmental Services

Alexandra Clingman, Associate Planner  
[aclingman@simivalley.org](mailto:aclingman@simivalley.org)  
(805) 583-6772  
Department of Environmental Services



# CITY OF SIMI VALLEY

Home of The Ronald Reagan Presidential Library

REVIEW PERIOD: July 3, 2024 – August 2, 2024

TO: All Interested Parties

FROM: Department of Environmental Services

SUBJECT: REQUEST FOR REVIEW OF THE INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR A CONDITIONAL USE PERMIT (CUP-S-2023-0004) TO CONSTRUCT A 66,431 SQUARE-FOOT INDUSTRIAL TILT-UP BUILDING ON A 7.67-ACRE VACANT SITE FOR WAREHOUSING AND MANUFACTURING OF BAKERY INGREDIENTS, LOCATED AT 615 WEST LOS ANGELES AVENUE

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The attached Mitigated Negative Declaration and Initial Study have been forwarded to you for possible comments relating to your specific area of interest. Comments should be directed to:

Alexandra Clingman  
City of Simi Valley  
2929 Tapo Canyon Road  
Simi Valley, California 93063  
(805) 583-6772/ [aclingman@simivalley.org](mailto:aclingman@simivalley.org)

Copies sent to:

City Council  
City Manager  
City Attorney's Office  
Planning Commission  
City Departments:  
City Manager's Office  
City Clerk  
Environmental Services  
Deputy Env. Serv. Director/City Planner  
Principal Planner/Zoning Administrator  
Case Planner  
Environmental Planner  
Neighborhood Council Coordinator  
Neighborhood Council #3  
Recording Secretary  
Counter Copy  
Public Works Department Engineering  
B. Siemer  
G. Goddard  
Utilities  
A. Sexton  
R. Escobar

Maintenance  
C. Oberender  
Traffic  
J. Link  
Transit  
B. Gonzales  
Simi Valley Library (2)

County of Ventura  
Resource Mgmt. Agency  
D. Ward  
Watershed Protection District  
Fire Protection District  
Other Government Agencies  
State Clearinghouse  
Caltrans District 07 (2)  
California Department of Fish and Wildlife  
U.S. Army Corps of Engineers  
U.S. Fish and Wildlife Service  
SCAG Clearinghouse  
Calleguas Municipal Water District  
Ventura County Air Pollution Control District

City of Moorpark  
City of Thousand Oaks  
Rancho Simi Recreation and Park District  
Santa Monica Mountains Conservancy  
Simi Valley Unified School District  
Native American Heritage Commissions  
Fernandeño Tataviam Band of Mission Indians  
Mountains Recreation & Conservation Authority  
(MRCA)

Applicant: Walter Postelwait  
On the Rise Properties, LLC  
236 N. Chester Avenue, Ste. 200  
Pasadena, CA 91106  
(626) 316-6555  
[awpostelwait@pakgroupna.com](mailto:awpostelwait@pakgroupna.com)

Contact: Alan Grofsky  
PK Architecture  
29619 Agoura Road  
Agoura Hills, CA 91301  
(818) 584-0057  
[agrofsky@pkarchitecture.net](mailto:agrofsky@pkarchitecture.net)

CITY OF SIMI VALLEY  
**MITIGATED NEGATIVE DECLARATION**  
(NO SIGNIFICANT IMPACT ON THE ENVIRONMENT)

REVIEW PERIOD: July 3, 2024 – August 2, 2024

APPLICANT: Walter Postelwait  
On the Rise Properties, LLC  
236 N. Chester Avenue, Ste. 200  
Pasadena, CA 91106

CASE PLANNER: Alexandra Clingman, Associate Planner

ENVIRONMENTAL  
PLANNER: Alexandra Clingman, Associate Planner

PROJECT NO.: CUP-S-2023-0004 (Simi Pak Industrial Project)

PROJECT DESCRIPTION: Conditional Use Permit (CUP-S-2023-0004) to construct a 66,431 square-foot industrial tilt-up building on a 7.67-acre vacant site for warehousing and manufacturing of bakery ingredients.

PROJECT LOCATION: 615 West Los Angeles Ave

On the basis of the Initial Study for the project, it has been determined that the project would not have a potential or a significant effect on the environment. This document constitutes a Mitigated Negative Declaration based upon the inclusion of the following measures into the project by the Permittee:

- I-1 **Lighting.** All lighting must be equipped with recessed lenses, full cutoff shields, and mounted to face away from all natural areas, in order to limit illumination at the edge of the paved areas to 0.5 foot-candles during business hours, and 0.1 foot-candles during non-business hours. Exterior lighting on structures are required to meet the Simi Valley Municipal Code Chapter 8-21 (Security Standards for Buildings) and must be situated to avoid directing lighting into the adjacent natural areas to the west of the project site. A note must be placed on the Photometric plan that states, "All downcast light fixtures must be installed and permanently maintained in a horizontal position." Light fixtures cannot exceed 14 feet in height on the western portion of the project.
  
- I-2 **Crotch's Bumble Bee Survey.** A pre-grading focused survey for Crotch's Bumble Bee is required during the Crotch's Bumble Bee active period (March to July) before beginning vegetation removal activities. Three visual surveys must be conducted by a qualified Biologist (i.e., one with a minimum of two (2) years of experience in the identification of bee species). A qualified Biologist must meet the minimum qualifications for Biological Consultants as listed below and defined by the County of Ventura Planning Division (REF #12):
  - a. Must have an undergraduate or graduate degree with coursework in biology, botany, wildlife biology, natural resources, ecology, conservation biology, or environmental biology;
  - b. Have an up-to-date subscription to and experience using the California Natural Diversity Database/BIOS;

- c. Be able to map survey findings in GIS or have access to an individual or firm with the ability to map survey findings in GIS to conduct biological field surveys and construction monitoring; and
- d. Must have at least four years of experience conducting wildlife surveys for biological groups located within the region and be able to identify Ventura County's designated Locally Important Species.

Surveys must be conducted at least two hours after sunrise and three hours before sunset during suitable weather conditions. Sunny days with temperatures greater than 60 degrees Fahrenheit and wind speeds less than eight miles per hour are optimal. Meandering transects must be walked slowly on the project site to obtain a 100 percent survey cover.

The Biologist must search for Crotch's Bumble Bee activity and the presence of ground nests. Cavities such as mammal burrows must be inspected with binoculars for evidence of bumble bee use during the transect. If multiple exiting/entering bumble bees are observed at a cavity, further observation must occur for 30 minutes, until nesting is confirmed (e.g., multiple individuals entering the cavity). If a ground nest is observed, it must be protected in a place from vegetation removal until it is no longer active as determined by a Biologist. A report must be prepared by the project Biologist to document the results of the pre-grading survey and must be provided to the Environmental Services Director of the City of Simi Valley and the California Department of Fish and Wildlife (CDFW) no later than 45 days after of the date of the survey.

**I-3 Crotch's Bumble Bee Monitoring.** In accordance with California Department of Fish and Wildlife survey guidelines (2023), a qualified biological monitor must be present onsite during vegetation clearing and/or ground-disturbing activities that take place during the queen flight period (i.e., February to March), active colony period (i.e., April to August), or gyne flight period (i.e., September to October) for Crotch's Bumble Bee. No biological monitoring is required if vegetation clearing or ground disturbing occurs from November to January. The qualified biological monitor must meet the minimum qualifications for a qualified biologist to conduct construction monitoring duties as listed below and defined by the County of Ventura Planning Division:

- a. The ability to identify Ventura County's designated Locally Important Species;
- b. At least four years of combined experience performing botanical and wildlife surveys within the region (e.g., Ventura, Santa Barbara, Kern, San Luis Obispo, and/or Los Angeles Counties); and
- c. Obtain and submit a signed California Department of Fish and Wildlife Memorandum of Understanding for Crotch's Bumble Bee, to the Environmental Services, Environmental Planner prior to conducting monitoring activities.

**I-4 Nesting Birds/Coastal California Gnatcatcher Survey.** No more than three days before any clearing or grading activity, a field survey must be conducted by a qualified Biologist with a degree in biology and at least two years of experience carrying out field surveys for nesting birds in Southern California, including the coastal California Gnatcatcher. The Biologist's pre-construction survey must determine if special status or other bird species are breeding and/or nesting in the trees in the construction zone or within 100 feet (300 feet for raptors) of the construction zone. The results of this survey and any subsequent surveys must be submitted to the Environmental Services Director of

the City of Simi Valley following completion and before the Public Works Director issues grading permits. If ground disturbance activities are delayed for more than 25 days past the date of the first pre-construction survey, then the Permittee must conduct additional pre-construction surveys so that no more than three days elapse between the survey and the ground disturbance activity.

**I-5 Active Nest Buffer.** If the Permittee’s Biologist determines that there are active nests within or adjacent to the development area, the Permittee must erect a fence barrier on the project site around the nest site, at a minimum distance of 300 feet from raptor nests and 100 feet from passerine nests. No work may occur within a nest buffer under any circumstance unless authorized in writing by the CDFW, or until the fledglings are no longer dependent on the nest, or the nest is inactive as documented in writing by the Permittee’s Biologist and Environmental Services Director has reauthorized work by the Permittee.

- If the Permittee’s Biologist determines that a buffer reduction in the placement of the fence is feasible, without affecting the outcome of a nest, they must prepare and submit a letter to the CDFW requesting the buffer reduction along with any necessary information and a statement of justification to ensure the CDFW can make an informed decision to allow the reduction or not. CDFW buffer reduction approvals must be provided to the Environmental Services Director of the City of Simi Valley.
- When construction activities are scheduled to occur between an original buffer and a reduced buffer after the CDFW has approved a buffer reduction, a qualified Biologist as defined above must monitor the nest before, during, and after the activities, to determine if the nest is being affected.
- The only activities that will be allowed between the original buffer and the reduced buffer are those that generate noise levels less than 60 dBA as measured at the source. The Biologist must record noise levels every hour to ensure activities do not exceed 60 dBA.
- Shielded lighting must be used for any nighttime construction (between the hours of 7:00 am to 7:00 pm) adjacent to any buffer area.

The Biologist must compile weekly monitoring reports and submit them to the CDFW documenting the status of monitored nests and others as necessary. The weekly monitoring reports must be submitted to the Environmental Services Director of the City of Simi Valley at the end of the construction phase. Both the CDFW and the Environmental Services Director of the City of Simi Valley must be notified immediately if Project activities result in take as defined by the California Endangered Species Act.

**I-6 West End Specific Plan Oak Tree Removal.** The removal of any Oak trees identified in the Tree Report (Lee Newman & John Oblinger, Tree Report for West Los Angeles Avenue, Simi Valley, December 9, 2022. Revised November 8, 2023, on file with the City of Simi Valley) must be mitigated by planting Coast Live Oak (*Quercus agrifolia*) on a three-to-one basis in locations approved by the Environmental Services Director. If planting on site is not possible as determined by the Environmental Services Director, a mitigation amount as determined by the Environmental Services Director of the City of Simi Valley must be paid to the City’s tree fund.

**I-7 Alamos Creek Buffer.** Site grading and development must remain at least 100 feet away from the top of the bank of Alamos Creek to the west (Drainage A), and

at least 140 feet away from the edge of the existing concrete drainage feature to the east (Drainage B).

**I-8 Unanticipated Discovery of Cultural Resources.** In the event intact cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology (National Park Service 1983) must be contacted immediately to evaluate the find. If the discovery proves to be eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, additional work such as data recovery excavation and/or Native American consultation to treat the find may be warranted as ordered by the Environmental Services Director.

**I-9 Paleontological Resources Impact Mitigation Plan and Paleontological Monitoring.** Before the commencement of ground disturbing activities, the Permittee must retain a qualified Project Paleontologist to direct all mitigation measures related to paleontological resources. A qualified Project Paleontologist is defined by the Society of Vertebrate Paleontology standards as a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A Project Paleontologist must have the equivalent of the following qualifications:

- a. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience;
- b. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts;
- c. Proficiency in recognizing fossils in the field and determining their significance;
- d. Expertise in local geology, stratigraphy, and biostratigraphy; and
- e. Experience collecting vertebrate fossils in the field.

The Project Paleontologist must be retained to prepare and implement a Paleontological Resources Impact Mitigation Plan (PRIMP) for the Project.

The PRIMP must be consistent with the 2010 Society of Vertebrate Paleontology guidelines and outline requirements for pre-construction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the Project Site based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management.

**I-10 Worker's Environmental Awareness Program.** Before the start of Project construction activities, all field personnel must receive a worker's environmental awareness training on paleontological resources by a qualified Project Paleontologist, as described above. The training must provide a description of the laws and ordinances protecting fossil resources, the types of fossil resources that may be encountered in the Project area, the role of the Paleontological Monitor, as defined below, steps to follow if a fossil discovery is made, and contact information



for the Project Paleontologist. The training must be developed by the Project Paleontologist and must be delivered concurrently with other training including cultural, biological, safety, et cetera.

**I-11 Paleontological Monitoring and Fossil Discoveries.** Monitoring must be conducted by a qualified Paleontological Monitor, who is defined by the Society of Vertebrate Paleontology as a Paleontological Resources Monitor. A qualified Paleontological Monitor must have the equivalent of the following qualifications:

- a. BS or BA degree in geology or paleontology and one year of experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing the ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring; or
- b. AS or AA in geology, paleontology, or biology and demonstrated two years' experience collecting and salvaging fossil materials in the state or geologic province of the specific project; or
- c. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.
- d. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

The Paleontological Monitor must be responsible for maintaining daily monitoring logs for those days monitoring occurs. The duration and timing of the monitoring must be determined by the Project Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City of Simi Valley Environmental Services Director. If the Project Paleontologist determines full-time monitoring is no longer warranted based on the geologic conditions at depth, they may recommend that monitoring be reduced or cease entirely. Monitoring must be reinstated if any new ground disturbances are required and reduction or suspension must be reconsidered by the Project Paleontologist at that time.

If a paleontological resource is discovered, the Paleontological Monitor must have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and, if appropriate, collected. If the resource is determined to be of scientific significance, the Project Paleontologist must complete the following:

Salvage of Fossils. If fossils are discovered, all work in the immediate vicinity must be halted to allow the Paleontological Monitor, and/or Project Paleontologist to evaluate the discovery and determine if the fossil may be considered significant. If the fossils are determined to be potentially significant, the Project Paleontologist (or Paleontological Monitor) must follow standard field procedures for collecting paleontological resources as outlined in PRIMP for the Project. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the Project Paleontologist and/or Paleontological Monitor must have the authority to temporarily direct, divert, or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner.

Fossil Preparation and Curation. The PRIMP for the Project must identify the museum that has agreed to accept fossils that may be discovered during Project related excavations. Upon completion of fieldwork, all significant fossils collected must be prepared in a properly equipped laboratory to a point ready for curation. Preparation may include the removal of excess matrix from fossil materials and stabilizing or repairing specimens. During preparation and inventory, the fossilized specimens must be identified to the lowest taxonomic level practical before curation at an accredited museum. The fossil specimens must be delivered to the accredited museum or repository no later than 30 days after all laboratory work is completed. The cost of curation must be assessed by the repository and is the responsibility of the Permittee.

A paleontological monitoring report must be prepared within 60 days following the completion of the ground disturbance and submitted to the City of Simi Valley for review. This report must document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report must be submitted to the South Central Coastal Information Center and the Society of Vertebrate Paleontology.

**I-12 Transportation Demand Strategies.** The Permittee must implement the following transportation demand management strategies:

T-7: Implement Commute Trip Reduction Marketing

This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that a traveler could choose to read at their own leisure. For the purposes of the analysis, it is assumed that every employee would be eligible for passive marketing and promotional materials. A minimum of one marketing tool must be provided to all employees within one year of obtaining a Certificate of Occupancy. A copy of the marketing tool must be provided to the Director of Environmental Services before the Environmental Services Director issues a Certificate of Occupancy.

T-8: Provide Ridesharing Program

This strategy involves the use of ride-sharing matching services, designated preferred parking for ride-share participants, adequate passenger loading/unloading and waiting areas for ride-share vehicles, and a website or message board to connect riders and coordinate rides in order to increase vehicle occupancy. For the purposes of the analysis, it is assumed that every employee would be eligible for the ride-share program. The Permittee must provide details of the proposed rideshare program that is acceptable to the Director of Environmental Services before the Environmental Services Director issues a Certificate of Occupancy.

T-10: Provide End of Trip Bicycle Facilities

This strategy involves the installation and maintenance of end-of-trip facilities for the employee's use, which includes bicycle parking, bike lockers, showers, and personal lockers. The number of bicycle parking spaces provided must be a minimum of one (1) space over and above what is required by the California Green Building Standard Building Code. Bike lockers, showers, and personal lockers must be installed proportional to the number of bike spaces provided, inclusive of

all gender identities, and regularly maintained. The Permittee must provide details of the proposed parking spaces and facilities on the final site plan and floor plan before the Environmental Services Director issues a Zoning Clearance.

**I-13 Ventura County Vehicle Miles Traveled Adaptive Mitigation Program (VMT AMP) Fair Share Cost Fee.** The Permittee must participate in the VMT AMP and pay a fair share cost of the transportation fee of \$1,650.00 per employee payable to the City of Simi Valley in a manner as determined by the Director of Public Works or designee before the Environmental Services Director issues a Zoning Clearance. Before the Environmental Services Director issues a Zoning Clearance, the Permittee must submit documentation to the Environmental Services Director confirming the number of employees hired at the project site. Throughout the duration of the Conditional Use Permit, if more employees are hired than initially approved, the Permittee must provide updated documentation to the Environmental Services Director and pay an additional Fair Share Cost Fee based on the VMT AMP fees applicable at the time of the request for additional employees.

**I-14 Tribal Monitor.** The Permittee must retain a professional Tribal Monitor procured by the Fernandefio Tataviam Band of Mission Indians (FTBMI) to observe the trenching for installation of an 18" HDPE Onsite Storm Drain. If Tribal Cultural Resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of the discovery and the Permittee must retain a qualified archaeologist meeting Secretary of Interior standards to assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period.

Should the find be deemed significant, as defined by Assembly Bill 52, Codified in Public Resources Code Section 21080.3.1 (REF #29), the Permittee must retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

**I-15 Consultation.** The Lead Agency and/or Permittee must, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

**I-16 Human Remains.** If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) must cease and the County Coroner must be contacted pursuant to California Health and Safety Code § 7050.5 and that code must be enforced for the duration of the Project.


Inadvertent discoveries of human remains and/or funerary object(s) are subject to California Health and Safety Code § 7050.5, and the subsequent disposition of those discoveries must be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), if the NAHC determines the remains or funerary object(s) are Native American in origin. Commission, which will determine and notify a MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the Permittee must reenter the remains in an area of the property secure from subsequent disturbance.

I-17

**Mitigation Monitoring Fee.** Before initiation of any ground-disturbing activities or the Environmental Services Director issues a Zoning Clearance, whichever comes first, the Permittee must pay a Mitigation Monitoring Fee equivalent to a major Plan Check Site Inspection fee. This fee must be paid to the Department of Environmental Services one week following final approval of the project and in accordance with the City of Simi Valley Schedule of Service Charges at the time of payment.

RESPONSIBLE AGENCIES: City of Simi Valley

TRUSTEE AGENCIES: None

  
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Alexandra Clingman, Associate Planner

CITY OF SIMI VALLEY  
PLANNING DIVISION  
DEPARTMENT OF ENVIRONMENTAL SERVICES  
INITIAL STUDY

1. Project Title: CUP-S-2023-0013
2. Lead Agency Name and Address: City of Simi Valley  
2929 Tapo Canyon Road  
Simi Valley, CA 93063
3. Contact Person and Phone Number/Email: Alexandra Clingman, (805) 583-6772  
[aclingman@simivalley.org](mailto:aclingman@simivalley.org)
4. Project Location: 615 West Los Angeles Avenue
5. Project Sponsor's Name and Address: Walter Postelwait  
On the Rise Properties, LLC  
236 North Chester Avenue, STE. 200  
Pasadena, CA 91106
6. Current General Plan Designation: Industrial
7. Current Zoning: Light Industrial (LI),  
Sexually Oriented Business Overlay (SB)  
West End Specific Plan (WESP)
8. Description of Project:

The Applicant (Permittee), Walter Postelwait, On the Rise Properties, LLC, applied for a Conditional Use Permit (CUP-S-2023-0004) on March 13, 2023. The request is to construct a 66,431 square-foot industrial tilt-up building on a 7.67-acre vacant site. The building is intended for warehousing and manufacturing bakery ingredients and will have 38,582 square feet of warehouse space, 6,600 square feet of office space, and a 21,000 square-foot manufacturing area. The building will have two driveway entrances from West Los Angeles Avenue, providing access to the 91 parking areas and the 8 loading docks located on the west and east sides of the building.

The site will include 28.3 percent of new landscaping and the removal of four Coast Live Oaks and two Peruvian pepper trees. To mitigate the loss of these trees, the Permittee is required to plant upsized replacement trees on-site or pay into the City's Tree Mitigation Fund.

The site is currently vacant and will require approximately 30,000 cubic yards of excavation and 19,000 cubic yards of fill. New grading will remain at least 100 feet away from the top of the bank of Alamos Creek to the west (Drainage A), and over 140 feet away from an existing concrete drainage feature to the east (Drainage B). Drainage A and B are considered jurisdictional drainage features on-site, and they fall under the jurisdiction of the Army Corps of Engineers, the Regional Water Quality Control Board, and the California Department of Fish and Game.

9. Surrounding Land Uses and Setting:

The project site is bordered by a 100-foot wide railroad right of way and vacant land to the north and east, a recently approved but unbuilt industrial development to the west, a RV and contractor storage facility to the southwest, and a sanitation facility and City offices to the south.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

None

11. Date Deemed Complete/Ready to Process: March 22, 2024

12. A site inspection was performed on:

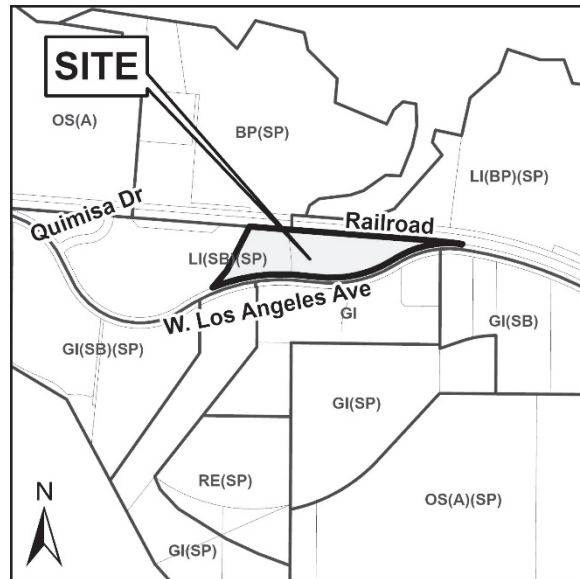
Date: August 18, 2023

By: Alexandra Clingman, Associate Planner

13. Are any of the following studies required? ("Yes" or "No" response required)

<u>Yes</u>	Traffic Study
<u>No</u>	Noise Study
<u>Yes</u>	Geotechnical Study
<u>Yes</u>	Hydrology Study
<u>Yes</u>	Tree Study and Appraisal (pursuant to SVMC Section 9-38 et seq.)
<u>Yes</u>	Biological Study
<u>Yes</u>	Rare, Threatened and Endangered Species Survey
<u>No</u>	Wetlands Delineation Study
<u>Yes</u>	Archaeological/Cultural Resource Study
<u>No</u>	Historical Study
<u>No</u>	Other (List): _____

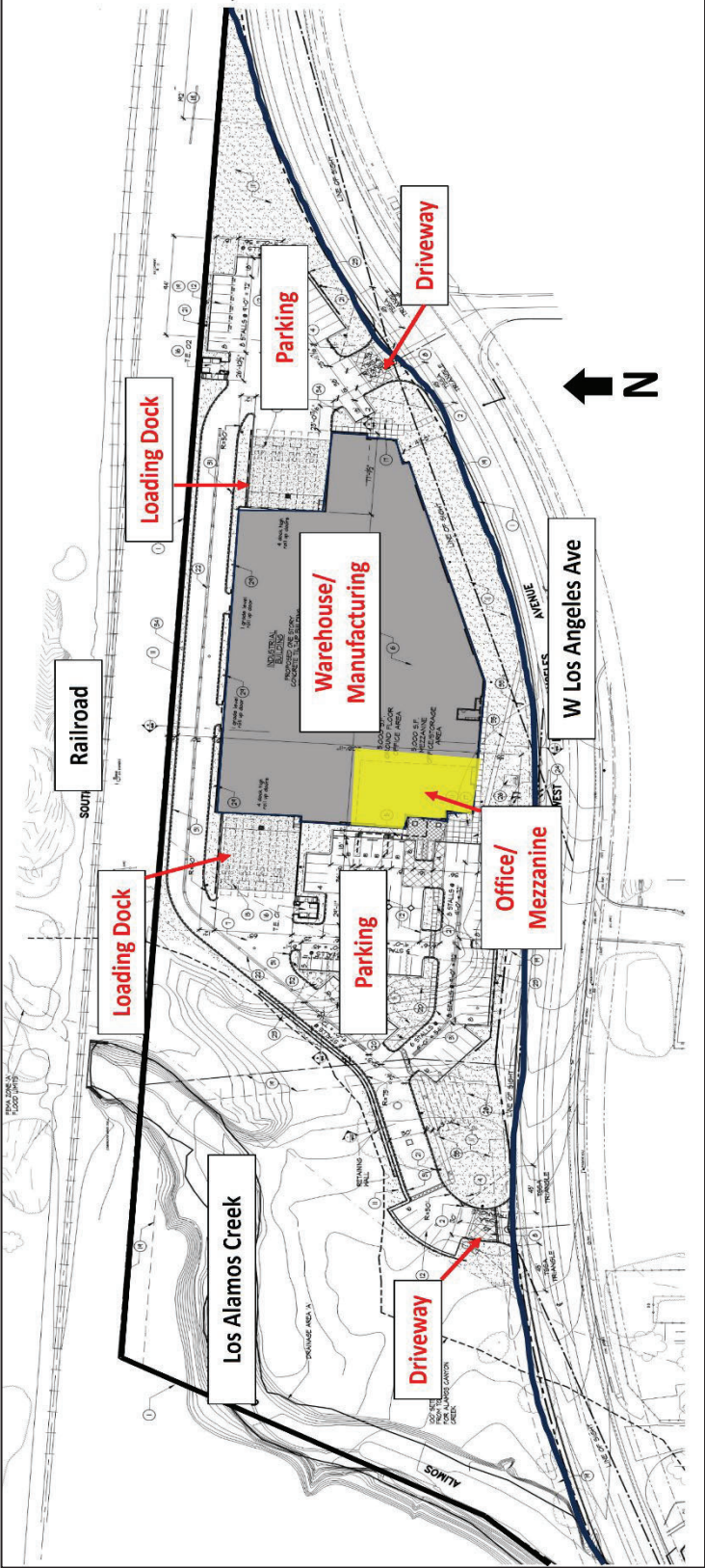
14. Location Map:



15. Aerial Photograph:



16. Site Plan:





ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

This project would potentially affect the environmental factor(s) marked "Yes" below, involving at least one impact that is "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages:

<u>Yes</u>	Aesthetics	<u>No</u>	Mineral Resources
<u>No</u>	Agriculture and Forestry	<u>No</u>	Noise
<u>No</u>	Air Quality	<u>No</u>	Population/Housing
<u>Yes</u>	Biological Resources	<u>No</u>	Public Services
<u>Yes</u>	Cultural Resources	<u>No</u>	Recreation
<u>No</u>	Energy	<u>Yes</u>	Transportation
<u>Yes</u>	Geology/Soils/(Paleontology)	<u>Yes</u>	Tribal Cultural Resources
<u>No</u>	Greenhouse Gas Emissions	<u>No</u>	Utilities/Service Systems
<u>No</u>	Hazards & Hazardous Materials	<u>No</u>	Wildfire
<u>No</u>	Hydrology/Water Quality	<u>Yes</u>	Mandatory Findings of Significance
<u>No</u>	Land Use/Planning		

DETERMINATION:

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

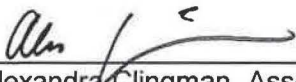
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

7/2/24  
Date

  
Alexandra Clingman, Associate Planner, for Sean Gibson, Deputy Environmental Services Director/City Planner

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Issues and Supporting Sources:

I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:

- a) Have a substantial adverse effect on a scenic vista?

Scenic vistas include views of features such as mountains, forests, the ocean, or urban skylines. The City of Simi Valley is bordered by the Santa Susana Mountains to the north, the Simi Hills to the south and east, and the community of Moorpark and the Conejo Valley to the east and southeast. The project will not add structures or other uses that may block views of any identified scenic vistas (REF #1). The project is limited by the West End Specific Plan (WESP) and Simi Valley Municipal Code (SVMC) requirements for height limitations, architectural and planting standards, and grading performance standards and therefore, the project will not significantly obstruct the view of the Simi Hills and open space from the valley floor. For these reasons, the project will not result in a substantial adverse effect on a scenic vista.

- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site is vacant and contains mature trees, specifically four Coast Live Oaks and two Peruvian pepper trees located primarily west of the proposed building. The trees that cannot be maintained in order to develop the site and/or as a result of poor health or hazardous conditions will be removed in accordance with the Simi Valley Municipal Code Chapter 9-38- Tree Preservation, Cutting, and Removal (REF #2). The mitigation measures for the loss and maintenance of these trees are discussed below in Section III, Biological Resources. Therefore, the project will not result in substantial damage to scenic resources, including, but not limited to, trees and rock outcroppings present on the project site.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The proposed building will not exceed 41 feet and 3 inches in height. Its exterior is designed in compliance with the Citywide Design Guidelines and will consist of concrete tilt-up walls in varying shades of grey with copper-colored tile and corrugated metal siding accents.

The northern side of the building will be fully visible to passengers traveling by train through the area. The Permittee has incorporated a design treatment on the north elevations of the buildings adjacent to the railroad tracks that are similar to the design features found on the "front" or south-facing elevations of these buildings.

Additionally, a landscaped buffer area will screen the south, east, and west portions of the building along West Los Angeles Avenue through the use of trees, shrubs, and ground cover. Retaining walls ranging from 1 foot to 6.5 feet in height will be constructed along the south and west edges of the parking area and building and will be developed with landscaping to screen views from West Los Angeles Avenue. Therefore, the project will not

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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degrade the existing visual character or quality of the site and its surroundings, nor would it conflict with any applicable zoning or other regulations governing scenic quality.

- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project will create a new source of light from fixtures on the new buildings and in the parking areas. The Permittee is required to submit an exterior lighting (photometric) plan that adheres to the City of Simi Valley Municipal Code Lighting Standards (REF#3). This plan must consist of a point-by-point foot-candle layout extending a minimum of twenty feet outside the property lines. The lighting may produce a significant impact on the adjacent natural area, including the Alamos Creek Wildlife Corridor, to the west of the project site. Therefore, the following mitigation measure is included as part of the project application:

**AES-1 Lighting.** All lighting must be equipped with recessed lenses and full cutoff shields, and mounted to face away from all natural areas, in order to limit illumination at the edge of the paved areas to 0.5 foot-candles during business hours, and 0.1 foot-candles during non-business hours. Exterior lighting on structures as required to meet the Simi Valley Municipal Code Chapter 8-21 (Security Standards for Buildings) and must be situated to avoid directing lighting into the adjacent natural areas to the west of the project site. A note must be placed on the plan that states, "All downcast light fixtures must be installed and permanently maintained in a horizontal position." Light fixtures cannot exceed 14 feet in height on the western portion of the project.

With mitigation, there is no potential for a significant impact to the environment from a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES: Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The Project site and surrounding area is not listed in the California Important Farmland Finder (California Department of Conservation) (REF#4) and the project would not result in the conversion of prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the farmland mapping and monitoring program of the California resources agency, to non-agricultural use.

- b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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(b-c) The Project site is currently zoned LI (SB) (SP) [Light Industrial (Sexually Oriented Business) (West End Specific Plan)] and is not zoned for agricultural use or subject to a Williamson Act Contract. The site is also not zoned as forest land or timberland, as shown in the Simi Valley General Plan (REF#5). The proposed Project would not conflict with or cause rezoning of land zoned as forest land, timberland, or timberland production.

- d) Result in the loss of forest land or conversion of forest land to non-forest use?

As described above, there is no forest land within or adjacent to the proposed Project site. Therefore, the proposed Project would have no impact on the conversion of forest land to non-forest use.

- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

As previously stated, there is no forest land within or adjacent to the proposed Project site and the Project site is not in agricultural production or adjacent to any land in agricultural production. Therefore, the proposed Project would have no direct impact on changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

### III. AIR QUALITY:

The following air quality discussion is based in part on project setting information and analysis data provided in the Air Quality, Greenhouse Gas Emissions, and Energy Report prepared for the Project by ENVICOM Corporation in March 2023 (REF#6). It should be noted that CalEEMod modeled a slightly larger building, slightly more parking, and slightly less landscaped area than the Project proposes. This model provides a more conservative estimate of Project emissions than estimated emissions. In addition, the model assumed a construction start date of February 2023; however, modeling an earlier construction period represents a “worst-case” analysis scenario even if construction was to occur any time after the modeled start date. This is due to the increased stringency of emissions regulations and increased efficiency of equipment that occurs over time, which are included in the CalEEMod background emissions assumptions for the model. Therefore, construction of the Project would likely emit less emissions than presented below.

The Project Site is located in the South Central Coast Air Basin (Air Basin or Basin), which covers Ventura, Santa Barbara, and San Luis Obispo Counties. The Ventura County Air Pollution Control District (VCAPCD) monitors and regulates the local air quality in Ventura County and manages the Air Quality Management Plan (AQMP). The analysis presented in this section is based upon information found in the Ventura County Air Quality Assessment Guidelines (VCAPCD Guidelines), adopted by the VCAPCD in 2003.

Air quality is affected by stationary sources (e.g., industrial uses and oil and gas operations) and mobile sources (e.g., motor vehicles). Air quality at a given location is a function of several factors, including the quantity and type of pollutants emitted locally and regionally and the dispersion rates of pollutants in the region. Primary factors affecting pollutant dispersion are wind speed and direction, atmospheric stability, temperature, the presence or absence of inversions, and topography. The Project Site is located in the southeastern portion of the

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Basin, which has moderate variability in temperatures, tempered by coastal processes. The air quality in the Basin is influenced by a wide range of emission sources, such as dense population centers, heavy vehicular traffic, industry, and weather.

### Air Quality Standards and Attainment

The VCAPCD is required to monitor air pollutant levels to ensure National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are met. If the standards are met, the Basin is classified as being in “attainment.” If the standards are not met, the Basin is classified as being in “nonattainment,” and the VCAPCD is required to develop strategies to meet the standards. According to the California Air Resources Board (CARB), the air quality data and trends in the vicinity of the Project Site are:

- Ozone (O<sub>3</sub>) levels exceeded 1-hour federal or state standards on one day (in 2020), from 2018-2021, and exceeded 8-hour federal standards on 10 days from 2018-2021;
- Particulate matter less than 10 microns in diameter (PM<sub>10</sub>) levels exceeded the state 24-hour standard on 13 days in 2018-2021 (insufficient data was reported for 2020). The federal 24-hour PM<sub>10</sub> standard was not exceeded from 2018-2021;
- Particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) levels exceeded federal 24-hour standards on two days from 2018-2021; and
- Nitrogen Oxides (NOx) levels measured from 2018-2021 did not exceed federal or state standards.

### Air Pollutant Emission Thresholds

The VCAPCD Guidelines recommend specific air emissions criteria and threshold levels for determining whether a project may have a significant adverse impact on air quality within the Basin. The Project would have a significant impact if operational emissions exceed 25 pounds per day of reactive organic gases (ROG) or 25 pounds per day of nitrogen oxides (NOx). The 25 pounds per day threshold for ROG and NOx is not intended to be applied to construction emissions since these emissions are temporary. Nevertheless, the VCAPCD Guidelines state that construction-related emissions should be mitigated if estimates of ROG or NOx emissions from heavy-duty construction equipment exceed 25 pounds per day for either ROG or NOx. Recommended measures include minimizing equipment idling time; maintaining equipment engines in good condition and in proper tune; lengthening the construction period during smog season (May through October); and use of alternatively-fueled construction equipment (e.g., compressed natural gas, liquefied natural gas, electric) if feasible.

VCAPCD has not established quantitative thresholds for particulate matter for either operation or construction. However, VCAPCD indicates that a project that may generate fugitive dust emissions quantities that would cause injury, detriment, nuisance, or annoyance to a considerable number of persons, or which may endanger the comfort, repose, health, or safety of any such person, or which may cause or have a natural tendency to cause injury or damage to business or property, would have a significant air quality impact. This threshold applies to the generation of fugitive dust during construction grading and excavation activities. The VCAPCD Guidelines recommend application of fugitive dust mitigation measures for all dust-generating activities, including construction best management practices, such as:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- Apply water to disturbed soils of the Site at least twice daily during construction;
- Require the use of gravel apron and/or rumble pad at truck exit points to reduce mud and dirt track out onto area roadways;
- All soil materials transported offsite must be securely covered during transit;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all graded areas that remain inactive for ten days or more; and
- Limit traffic speeds on all unpaved portions of the Site to 15 miles per hour or less by providing worker notification, signage, or other means.

Applicable Ventura County Air Pollution Control District Rules and Regulations

VCAPCD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the Project include those listed below.

Rule 55 (Fugitive Dust)

This rule 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. The rule would apply during construction and operational activities.

Rule 74.2 (Architectural Coatings)

This rule sets limits on the Volatile Organic Compound (VOC) content of architectural coatings. Default, flat, and non-flat coatings are limited to 50 grams per liter of VOC content, fire-resistant coatings are limited to 150 grams per liter (g/L) of VOC content, and traffic marking coatings are limited to 100 g/L of VOC content. The Project would be required to comply with this rule.

Would the project:

- a) Conflict with or obstruct implementation of the Ventura County Air Quality Management Plan?

The VCAPCD Guidelines state that project consistency with the AQMP can be determined by comparing the actual population growth in the county with the projected growth rates used in the AQMP. Therefore, 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 2016 AQMP was adopted by the VCAPCD Board on February 14, 2017, and is the most recent applicable air quality plan.

The Ventura County 2022 population is estimated at 833,652, a 0.9 percent growth decrease from 2021 (REF#2). The 2016 AQMP estimates that the population will increase to 905,574 by 2025 (REF#3). The Project would construct a light industrial building and the Project developer anticipates approximately 50 employees at the Site when fully staffed. Future uses could result in more or fewer employees onsite as light industrial buildings can be utilized for a number of different uses. However, such uses will normally have a high square-footage to employee ratio. This is reflected in the average rental price per square foot of an industrial

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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building being five times less than the average rental price of an office building where there is a much lower ratio of square-footage to employees (REF#4). Therefore, to evaluate the Project's potential to increase population, a more conservative estimate of 94 employees was used, based on the capacity of the parking lot.

In a worst-case scenario, all 94 employees would have families and move to the County from outside of it to work at the Project Site. Based on the County's average household size of 3.03 persons (REF#5), the Project would result in 285 new residents. This addition would increase the projected County population to 833,937, which would be within the County's anticipated population growth forecast for 2025.

The VCAPCD Guidelines also state that "if there are more recent population forecasts that have been adopted by the Ventura Council of Governments (VCOG) where the total county population is lower than that included in the most recently adopted AQMP population forecasts, lead agencies may use the more recent VCOG forecasts for determining AQMP consistency." According to the Southern California Association of Governments (SCAG) Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), the projected population for Ventura County for the years 2020 and 2030 are 877,000 and 906,000, respectively. By interpolation, the County's 2026 population would be 894,400 based on the 2020-2045 RTP/SCS. The Project-related population growth over current levels would therefore also be within the more recently adopted population forecasts.

Therefore, the Project would not generate growth exceeding the most recently adopted AQMP population forecasts and, thus, would not be inconsistent with the AQMP. The Project's potential to conflict with or obstruct implementation of the AQMP resulting in environmental impacts would be less than significant (REF#7).

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?

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and VCAPCD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

Construction

The Project's estimated construction emissions were modeled using CalEEMod Version 2020.4.0 to identify maximum daily emissions for each pollutant during project construction. Construction emissions were modeled based primarily on the size of the Project Site and the proposed land use type and floor space, and the estimated duration of construction activities and types of equipment to be used. Maximum daily pollutant emissions from construction activities include emissions from worker trips, hauling trips, construction vehicle emissions and fugitive dust from Site Preparation, Grading, Paving, Building construction, and Architectural Coating phases.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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To reduce potential emissions of ozone precursors during construction, off-road construction equipment used on the Site will meet the Tier 4 emission reduction standards of the United States Environmental Protection Agency (USEPA), and in compliance with the latest VCAPCD Rule 74.2 (Architectural Coatings) limitations, which became effective July 1, 2021, the Project would use paints with a maximum VOC content of 50 g/L for interior and exterior surfaces. The estimated maximum daily construction emissions are summarized in Table III-1, Construction-Related Pollutant Emissions. The VCAPCD Thresholds for ROG and NOx do not apply to construction emissions, however they have been included in Table III-1 for informational purposes only.

Table III-1, Construction-Related Pollutant Emissions

Activity	Pollutant Emissions (pounds/day) <sup>1</sup>				
	ROG	NOx	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily Emissions <sup>2,3</sup>	16.7 <sup>4</sup>	4.0	19.3	15.5	3.78
VCAPCD Thresholds	25	25	--	--	--
Exceeds Threshold?	No	No	--	--	--

-- = no threshold exists

1 Maximum daily emissions for all years of construction. Summer or Winter season, whichever is greater.

2 The Project would use off-road diesel-powered equipment that meets USEPA Tier 4 Final emissions standards.

3 Includes watering of exposed surfaces twice daily for dust suppression as required by VCAPCD Rule 55.

4 Exterior and commercial paints with 50 g/L VOC content (VCAPCD Rule 74.2).

Source: CalEEMod modeling outputs for the Project (see Appendix A of the Project's Air Quality, Greenhouse Gas, and Energy Report [REF#7]).

As shown in Table III-1, based on the duration of construction activities and the equipment to be utilized onsite, the Project's short-term construction-related emissions of ROG or NOx would not exceed the VCAPCD guideline of 25 lbs. /day. Additionally, as modeled by CalEEMod, Project emissions would remain below the VCAPCD thresholds for ROG and NOx without implementation of 'Tier 4 Final' equipment during construction (REF#7). Furthermore, as detailed above, the Project would also be required by VCAPCD Rule 55 to minimize construction fugitive dust emissions.

### Operation

During operations, the proposed uses would result in emissions of criteria pollutants from area sources (i.e., consumer products, architectural coatings, and landscaping equipment), energy sources (electricity and natural gas usage), and mobile sources (vehicle use), as well as off-road equipment (forklift) usage, which were also calculated using CalEEMod. As the Project Site is currently undeveloped, this analysis assumes that baseline operational emissions under existing conditions is zero. Project modeling assumes compliance with VCAPCD Rule 74.2. The worst-case summer or winter criteria pollutant emissions created from the Project's long-term operations have been calculated and are shown below in Table III-2, Operational Pollutant Emissions.



Potentially Significant Impact    Less Than Significant with Mitigation Incorporated    Less Than Significant Impact    No Impact

Table III-2, Operational Pollutant Emissions

Activity	Pollutant Emissions (pound/day) <sup>1</sup>				
	ROG	NOx	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily Emissions <sup>2</sup>	2.98	4.57	49.76	2.78	0.80
VCAPCD Thresholds	25	25	--	--	--
Exceeds Threshold?	No	No	--	--	--

-- = no threshold exists

1 All sectors/sources.

2 Maximum Daily emissions for Summer or Winter, whichever is greater.

Source: CalEEMod modeling output for the Project (see Appendix A of the Project's Air Quality, Greenhouse Gas, and Energy Report [REF#7]).

As shown in Table III-2, emissions from operation of the Project would not exceed the thresholds that the VCAPCD has determined for projects that will individually and cumulatively jeopardize attainment of the federal 1-hour ozone standard. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment under an applicable federal or state ambient air quality standard. Impacts from the Project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Air quality impacts are analyzed relative to those persons with the greatest sensitivity to air pollution exposure. Such persons are called "sensitive receptors." Sensitive receptors include the elderly, young children, the acutely and chronically ill (e.g., those with cardio-respiratory disease, including asthma), and persons engaged in strenuous work or exercise. Development surrounding the Project Site includes a municipal wastewater treatment plant to the south, industrial uses to the east, a railroad track and undeveloped land to the north, and a recently approved but not yet constructed industrial building which was historically a heavy equipment storage lot to the west. The nearest sensitive use is a single-family residence located approximately 0.7-mile (3,700 feet) to the south.

Toxic Air Contaminants

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure or acute (immediate) and/or chronic (cumulative) non-cancer health effects. A toxic substance released into the air is considered a toxic air contaminant (TAC). The California Air Pollution Control Officers Association (CAPCOA) has developed TAC health risk assessment guidelines to provide consistent, statewide procedures for preparing the health risk assessments required under the Air Toxics "Hot Spots" Act. The VCAPCD recommends that lead agencies conduct TAC risk assessments in accordance with the CAPCOA Risk Assessment Guidelines, as supplemented by VCAPCD's supplemental guidelines. According to VCAPCD and CAPCOA guidelines, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 30-year lifetime will contract cancer, based on the use of standard risk-assessment methodology.

Project construction would result in emissions of diesel particulate matter from heavy construction equipment and trucks accessing the site. Diesel particulate matter is

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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characterized as a TAC by the State of California. However, construction would take place over a 9-month period and thus would represent a small fraction of the recommended exposure duration. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks. Furthermore, as discussed above, the Project would use Tier 4 construction equipment, which would further limit emissions of diesel particulate matter from construction equipment.

The most recent Health Risk Assessment for Proposed Land Use Projects prepared by CAPCOA (July 2009) recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). Using the 11<sup>th</sup> Edition ITE Trip Generation Manual (2021) data, based on the Project's ITE Land Use Code 110 (General Light Industrial), the Project would generate approximately 12 truck trips per day, which would not conflict with the recommended siting distance. In addition, the Project would not include a TRU and based on the proposed warehouse, bakery ingredient manufacturing, and office land uses, it is not expected that operation of the Project would result in any non-permitted, direct TAC emissions (e.g., those from a point source such as full-time diesel generator usage). Accordingly, TACs generated during operation would not be expected to result in concentrations causing significant health risks.

Carbon Monoxide

Locally, Project-related traffic would be added to the City's roadway system. If such traffic occurs during periods of poor atmospheric ventilation, consists of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and operates on roadways already crowded with non-Project traffic, there is a potential for the formation of microscale Carbon Monoxide (CO) hotspots in the area immediately around points of congested traffic. Because of continued improvement in mobile emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the Basin is steadily decreasing.

The VCAPCD recommends conducting a CO hotspot screening analysis for any Project that meets both of the following conditions:

- 1) The project would generate indirect CO emissions are greater than the applicable ozone project significance thresholds (i.e., 25 pounds per day); and
- 2) The project would generate traffic that would significantly impact congestion levels at roadway intersections currently operating at, or that are expected to operate at, LOS [level of service] E or F as defined by the Simi Valley General Plan Table 4.16-2 (REF# 30).

As previously detailed, operation of the Project would not exceed the VCAPCD threshold of 25 pounds per day for O<sub>3</sub> precursors (ROG or NO<sub>x</sub>). In addition, according to the Project's Transportation Study (see Section XVII, Transportation, of this IS/MND for further discussion), the Project would result incremental but not detrimental changes in volume/capacity ratios at study intersections and none of the study intersections would operate at a LOS E or F. Accordingly, the Project does not trigger the need for a CO hotspot analysis and would not cause or contribute to a CO hotspot.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Conclusion

As detailed above, TACs generated during operation would not be expected to result in concentrations causing significant health risks. In addition, the Project would not cause or contribute to a CO hotspot. As such, and due to the distance between the Project Site and the nearest sensitive receptor, the Project would not expose sensitive receptors to substantial pollutant concentrations 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?

San Joaquin Valley Fever

San Joaquin Valley Fever (formally known as Coccidioidomycosis) is an infectious disease caused by the fungus *Coccidioides immitis*. The Valley Fever fungus tends to be found at the base of hillsides, in virgin, undisturbed soil in the southwestern United States. Valley Fever is a disease of concern in the Basin. Infection is caused by inhalation of *Coccidioides immitis* spores that have become airborne when dry, dusty soil or dirt is disturbed by natural processes such as wind or earthquakes, or by human-induced ground-disturbing activities such as construction, farming, or other activities (REF#8). There is no recommended threshold for a significant San Joaquin Valley Fever impact; however, according to the VCAPCD, the following factors may indicate a project’s potential to create significant Valley Fever impacts:

- Disturbance of the topsoil of undeveloped land (to a depth of about 12 inches).
- Dry, alkaline, sandy soils.
- Virgin, undisturbed, non-urban areas.
- Windy areas.
- Archaeological resources probable or known to exist in the area (Native American midden sites).
- Special events (fairs, concerts) and motorized activities (motocross track, All Terrain Vehicle activities) on unvegetated soil (non-grass).
- Non-native population (i.e., out-of-area construction workers)

According to the VCAPCD Guidelines, the lead agency should consider the factors above that are applicable to a project or a project site. Based on these or other factors, if a lead agency determines that a project may create a significant Valley Fever impact, the VCAPCD recommends that the lead agency consider the Valley Fever mitigation measures listed in the VCAPCD Guidelines to minimize fugitive dust as well as minimizing worker exposure. The Project Site is an undeveloped property, although the southern and northern portions of the Site adjacent to Los Angeles Avenue and the railway are previously disturbed. As such, development of the Project would disturb topsoil of some undeveloped land. However, the Project would be required by VCAPCD Rule 55 to implement measures to minimize fugitive dust during construction. Rule 55 specifically prohibits visible dust beyond the property line, limits the opacity of generated dust, and limits the amount of track-out (dirt or other debris tracked onto a paved, public roadway by the tires or tracks of construction equipment or vehicles leaving a site). Standard construction best management practices and control measures are used by construction sites to comply with Rule 55 and can include cessation of earth-moving work during high wind conditions, application of chemical stabilizers or water to exposed soils, installation of rumble grates for equipment and vehicles to travel over before entering public roadways, truck wheel wash stations, covering of soil stockpiles and haul truck

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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loads, and/or sweeping of adjacent public roadways to remove visible dust. The Project's mandatory compliance with Rule 55 would minimize dust from dry soils or during windy days, which would reduce the potential for a substantial risk of San Joaquin Valley Fever effects. Therefore, the potential for the Project to result in substantial San Joaquin Valley Fever impacts would be less than significant and additional avoidance, minimization, or mitigation measures would not be required.

Odors

The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

Construction Emissions

During Project construction, exhaust from equipment may produce discernible odors, typical of most construction sites. In addition, the application of certain materials (e.g., asphalt, paints, etc.) may generate odors within various portions of the Site that would be temporary in nature and common to construction projects. Such odors would disperse rapidly from the Project Site and generally occur at magnitudes that would not affect substantial numbers of people. Furthermore, the Project Site is surrounded by industrial uses and open spaces and there are no sensitive receptor land uses in the immediate vicinity of the Site. Therefore, impacts associated with odors during construction would be less than significant.

Operational Emissions

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (REF#8). As proposed, there are no such uses anticipated for the Project. Additionally, the Project would include an enclosure for all trash and recyclable materials, which would be emptied on a regular basis. Furthermore, within the light industrial zone, all activity must occur within an enclosed building, and the sort of uses that might produce objectionable odors are either not allowed or allowed only by a Conditional Use Permit (CUP). The CUP process would address the potential of the proposed use to produce objectionable odors and would apply conditions to address such odors if they were anticipated. Regardless, the Project Site is located in an area surrounded by industrial uses, including a sanitation facility located less than 500 feet to the south. Therefore, Project operations would result in an odor impact that is less than significant.

IV. BIOLOGICAL RESOURCES: Would the project:

- a) 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 Game or U.S. Fish and Wildlife Service?

A Biological Resources Assessment and Jurisdictional Delineation was prepared by Psomas (REF#9) for the Project Site which included literature reviews and a general plant and wildlife survey, and incorporated the results of additional focused surveys for California Gnatcatcher (REF#10). Focused surveys for Crotch's Bumble Bee (REF#11) were also conducted and the

Potentially Significant Impact    Less Than Significant with Mitigation Incorporated    Less Than Significant Impact    No Impact

results are discussed in this analysis. Table IV-1, Vegetation Types and Other Areas on the Project Site, presents the types and amounts of vegetation observed to occur at the Project Site.

Table IV-1, Vegetation Types and Other Areas on the Project Site

Vegetation Type / Area	Description and Location on Project Site	Amount (acres)
Mulefat thickets	Herbaceous riparian community along drainage in western portion of Site.	0.72
California sagebrush scrub	Band of upland vegetation adjacent to the riparian vegetation along drainage in western portion of Site.	0.26
Purple sagebrush scrub	Disturbed; along northern edge of Site.	0.46
Deerweed scrub	Disturbed.	1.68
Coast live oak woodland	Central portion of Site.	0.45
Pepper tree grove	Southern edge of Site.	0.35
Upland mustard/star-thistle fields	Non-native, weedy.	2.03
Disturbed/developed	Unvegetated bare ground and paved areas throughout Site, including a portion of the southernmost embankment.	1.71
Total		7.66
<i>Source: Psomas, Biological Resources and Jurisdictional Delineation Report, 7.7 Acre Site Project Site, Simi Valley, California, June 26, 2023 (REF#7).</i>		

No amphibian species were observed during the general survey; however, common amphibian species expected to occur at the Project Site include the California treefrog (*Pseudacris cadaverina*), Baja California treefrog (*Pseudacris hypochonriaca*), and western road (*Anaxyrus boreas*). Common reptile species observed include western fence lizard (*Sceloporus occidentalis*), coastal whiptail (*Aspidoscelis tigris munda*), and common side-blotched lizard (*Uta stansburiana*); southern alligator lizard (*Elgaria multicarinata*) and gopher snake (*Pituophis catenifer*) are also expected to occur. Common bird species observed include Canada goose (*Branta canadensis*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), acorn woodpecker (*Melanerpes formicivorus*), American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), bushtit (*Psaltriparus minimus*), Bewick's wren (*Thryomanes bewickii*), wrentit (*Chamaea fasciata*), western bluebird (*Sialia mexicana*), northern mockingbird (*Mimus polyglottos*), European starling (*Sturnus vulgaris*), house finch (*Haemorhous mexicanus*), lesser goldfinch (*Spinus psaltria*), white-crowned sparrow (*Zonotrichia leucophrys*), California towhee (*Melospiza crissalis*), and western meadowlark (*Sturnella neglecta*). Common mammal species that may occur on the Project Site include California ground squirrel (*Otospermophilus beecheyi*), northern raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), striped skunk (*Mephitis mephitis*), coyote (*Canis latrans*), bobcat (*Lynx rufus*), and southern mule deer (*Odocoileus hemionus*). (REF#7)

Based on the results of the general survey, no sensitive natural communities, special status plant species, or special state wildlife species were observed to occur onsite. However, suitable habitats for coastal California Gnatcatcher (*Poliophtila californica californica*), federally designated as Threatened and a California Species of Special Concern, and Crotch's Bumble Bee (*Bombus critchii*), a Candidate to be State-listed as Endangered, exist at the Site.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Nine focused surveys for coastal California Gnatcatcher were conducted; no coastal California Gnatcatchers were observed or detected (REF#10). However, there are several occurrences documented near the Project Site, onsite habitat is generally contiguous with larger areas of open space to the north where the species would have a limited potential to occur, and designated critical habitat for coastal California Gnatcatcher exists approximately 0.25-mile north of the Site (REF#10).

Three focused surveys for the Crotch’s Bumble Bee were conducted; no Crotch’s Bumble Bee were observed or detected. However, floral resources on the Site appear to provide good quality habitat for bumble bees and several bees, including one species of bumble bee (the California Bumble Bee), were observed during the surveys (REF#9).

The Project would impact a total of 5.16 acres of vegetation, including 2.73 acres of native vegetation, and 2.43 acres of non-native vegetation. None of the impacted vegetation is considered a candidate, sensitive, or special status plant species. Although no candidate, sensitive, or special status wildlife species were observed during the general or focused surveys, suitable habitat for both coastal California Gnatcatcher and Crotch’s Bumble Bee exists both onsite and offsite in the vicinity. Additionally, while common birds are not designated as special status species, destruction of their eggs, nests, and nestling is prohibited by federal and state law. The vegetation present on the Project Site provides potential nesting habitat for common resident birds. Nesting birds are protected under Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and under the Migratory Bird Treaty Act. Construction activities have the potential to harm protected birds either through direct contact with birds or their eggs, or through elevated noise levels in the surrounding area. Construction activities may also negatively affect breeding or reproduction of birds on or adjacent to the Project Site. Therefore, mitigation measures BIO-1 through BIO-4 have been imposed on the Project and require pre-construction surveys for Crotch’s Bumble Bee and nesting birds, including coastal California Gnatcatcher, as well as avoidance and protection in the event that these species are found onsite.

**BIO-1 Crotch’s Bumble Bee Survey.** A pre-grading focused survey for Crotch’s Bumble Bee must be required during the Crotch’s Bumble Bee active period (March to July) before the initiation of vegetation removal activities. Three visual surveys must be conducted by a qualified Biologist (i.e., one with a minimum of two (2) years of experience in the identification of bee species). A qualified Biologist must meet the minimum qualifications for Biological Consultants as listed below and defined by the County of Ventura Planning Division (REF#12):

- a. Must have an undergraduate or graduate degree with coursework in biology, botany, wildlife biology, natural resources, ecology, conservation biology, or environmental biology;
- b. Have an up-to-date subscription to and experience using the California Natural Diversity Database/BIOS;
- c. Be able to map survey findings in GIS or have access to an individual or firm with the ability to map survey findings in GIS. To conduct biological field surveys and construction monitoring; and
- d. Must have at least four years of experience conducting wildlife surveys for biological groups located within the region and be able to identify Ventura County’s designated Locally Important Species.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Surveys must be conducted at least two hours after sunrise and three hours before sunset during suitable weather conditions. Sunny days with temperatures greater than 60 degrees Fahrenheit and wind speeds less than eight miles per hour are optimal. Meandering transects must be walked slowly on the project site to obtain a 100 percent survey cover.

The Biologist must search for Crotch’s Bumble Bee activity and the presence of ground nests. Cavities such as mammal burrows must be inspected with binoculars for evidence of bumble bee use during the transect. If multiple exiting/entering bumble bees are observed at a cavity, further observation for 30 minutes must occur until nesting is confirmed (e.g., multiple individuals entering the cavity). If a ground nest is observed, it must be protected in place from vegetation removal until it is no longer active as determined by a Biologist. A report must be prepared by the project Biologist to document the results of the pre-grading survey and must be provided to the Environmental Services Director of the City of Simi Valley and the California Department of Fish and Wildlife (CDFW) no later than 45 days after of the date of the survey.

**BIO-2**

**Crotch’s Bumble Bee Monitoring.** In accordance with California Department of Fish and Wildlife survey guidelines (2023), a qualified biological monitor must be present onsite during vegetation clearing and/or ground-disturbing activities that take place during the queen flight period (i.e., February to March), colony active period (i.e., April to August), or gyne flight period (i.e, September to October) for Crotch’s Bumble Bee. No biological monitoring shall be required if vegetation clearing or ground disturbing occurs from November to January. The qualified biological monitor must meet the minimum qualifications for a qualified biologist to conduct construction monitoring duties as listed below and defined by the County of Ventura Planning Division:

- a. The ability to identify Ventura County’s designated Locally Important Species; and
- b. At least four years of combined experience performing botanical and wildlife surveys within the region (e.g., Ventura, Santa Barbara, Kern, San Luis Obispo, and/or Los Angeles Counties).

The qualified biological construction monitor shall also have the required California Department of Fish and Wildlife Memorandum of Understanding for Crotch’s Bumble Bee.

**BIO-3**

**Nesting Birds/ Coastal California Gnatcatcher Survey.** No more than three (3) days before any clearing or grading activity, a field survey must be conducted by a qualified Biologist with a degree in biology and at least two (2) years’ experience carrying out field surveys for nesting birds in Southern California, including the coastal California Gnatcatcher. This pre-construction survey must determine if special status or other bird species are breeding and/or nesting in the trees in the construction zone or within 100 feet (300 feet for raptors) of the construction zone. The results of this survey and any subsequent surveys must be submitted to the Environmental Services Director of the City of Simi Valley following completion and before the Public Works Director issues grading permits. If ground disturbance activities are delayed for more than 25 days past the date of the first pre-construction survey, then additional pre-construction surveys must be

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conducted so that no more than 3 days elapse between the survey and the ground disturbance activity.

**BIO-4 Active Nest Buffer.** If the Biologist determines that there are active nests within or adjacent to the development area, the Permittee must erect a fence barrier on the project site around the nest site, at a minimum distance of 300 feet from raptor nests and 100 feet from passerine nests. No work may occur within a nest buffer under any circumstance unless authorized in writing by the California Department of Fish and Wildlife, or until the fledglings are no longer dependent on the nest, or the nest is inactive as documented in writing by the Biologist.

- If the Biologist determines that a buffer reduction is feasible, without affecting the outcome of a nest, they must prepare and submit a letter to the CDFW requesting the buffer reduction along with any necessary information and a statement of justification to ensure the CDFW can make an informed decision to allow the reduction or not. A copy of the request must also be submitted to the Environmental Services Director. CDFW buffer reduction approvals must be provided to the Environmental Services Director of the City of Simi Valley.
- In circumstances when activities are scheduled to occur between an original buffer and a reduced buffer, a qualified Biologist as defined above must monitor the nest before, during, and after the activities, to determine if the nest is being affected.
- The only activities that will be allowed between the original buffer and the reduced buffer are those that generate noise levels less than 60 dBA as measured at the source. The Biologist must record noise levels every hour to ensure activities do not exceed 60 dBA.
- Shielded lighting must be used for any nighttime construction (between the hours of 7:00 am to 7:00 pm) adjacent to any buffer area.

The Biologist must compile weekly monitoring reports and submit them to the CDFW documenting the status of monitored nests and others as necessary. The weekly monitoring reports must be submitted to the Environmental Services Director of the City of Simi Valley at the end of the construction phase. Both the CDFW and the Environmental Services Director of the City of Simi Valley must be notified immediately if Project activities result in take as defined by the California Endangered Species Act.

Implementation of mitigation measures BIO-1 through BIO-4 would reduce the Project's potential to result in substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; impacts would be less than significant with mitigation.



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- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

(b-c) The Biological Assessment and Jurisdictional Delineation prepared for the Project identified two jurisdictional drainage features (Drainage A and Drainage B), both of which are described with respect to each jurisdictional agency in Table IV-2, Jurisdictional Water Resources in the Survey Area.

Table IV-2, Jurisdictional Water Resources in the Survey Area <sup>1</sup>

Jurisdiction	USACE WOTUS (acres)	RWQCB Waters of the State (acres)	CDFG Waters (acres)
Drainage A	0.291	0.291	0.719
Drainage B	0.005	0.005	0.014
Total	0.296	0.296	0.733

*USACE = United States Army Corps of Engineers; WOTUS = Waters of the United States; RWQCB = Regional Water Quality Control Board; CDFG = California Department of Fish and Game*

*<sup>1</sup> The survey area includes the entire jurisdictional features; some of the feature is located outside of the Project Site boundary.*

*Source: Psomas, Biological Resources and Jurisdictional Delineation Report, 7.7 Acre Site Project Site, Simi Valley, California, June 26, 2023 (REF#7).*

Drainage A

Drainage A is ephemeral with brief periods of water activity through the course of a given year. This drainage was dry at the time of the survey. Drainage A carries flow from the Alamos Canyon wash from the north, flowing south beneath State Route-118, then southwest through the Project Site, and continues southwest to the Arroyo Simi. Flood control structures are located at the northern edge of the Project Site where the wash crosses under the railroad tracks and at the southwestern edge of the Project Site where the wash crosses under West Los Angeles Avenue. Hydrophytic vegetation present in this drainage consists of mule fat and arroyo willow (*Salix lasiolepis*); however, indicators of wetland hydrology were not present. Therefore, the drainage is considered a non-wetland Waters of the United States (WOTUS) because no portion of the drainage met all three parameters (i.e., hydrology, hydrophytic vegetation, and soils) to be considered a wetland. The United States Army Corps of Engineers (USACE) would have jurisdiction over 0.291-acre of non-wetland WOTUS (REF#9).

On National Wetland Inventory (NWI) maps, Drainage A is mapped as an intermittent streambed in the Riverine System with a seasonally flooded water regime (USFWS 2022). Given the lack of inundation visible on historic aerial imagery (Google Earth), it is expected that this drainage is non-permanent waters that are inundated following storm events (i.e., ephemeral waters). Additionally, the NWI maps the same area separately, slightly

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west of the aforementioned section, as part of a larger scrub-shrub temporarily flooded streambed in the Paulstrine System. This separate section appears to be in place to describe the system as a whole rather than the Riverine System present within the Project Site. The Regional Water Quality Control Board (RWQCB) would have jurisdiction over the feature identified as ephemeral waters, as defined by indicators of ordinary high water mark (OHWM), such as a change in the average sediment texture, a change in vegetation cover, and/or a break in bank slope. A total of 0.291-acre of Waters of the State under the jurisdiction of the RWQCB occur on the Project Site (REF#9).

Drainage A contains riparian vegetation consisting of willow and mule fat and exhibited a bed and bank. A total of 0.719-acre of waters under the regulatory authority of the California department of Fish and Wildlife (CDFW) occurs on the Project Site (REF #9).

Drainage B

There is a concrete structure located at the eastern edge of the Project Site; this feature would also be within the jurisdiction of the USACE, RWQCB, and CDFW WOTUS. A corrugated metal pipe extends from under the railroad tracks from the north into this concrete structure; it then continues into an underground box culvert. The United States Geological Survey (USGS) Simi 7.5-minute quadrangle topographic map does not show a blueline feature in line with the concrete structure. There is no drainage feature in line with the culvert shown on the NWI. However, the National Hydrography Dataset (NHD) shows an ephemeral drainage that enters a corrugated metal pipe immediately north of the railroad tracks and flows south through the Project Site, entering the concrete box structure at the southern Site boundary and continuing to flow south under West Los Angeles Avenue until it converges with the Arroyo Simi, approximately 0.15-mile to the south. Therefore, this feature would be considered jurisdictional. Drainage B is considered a non-wetland WOTUS because no portion of the drainage met all three parameters (i.e., hydrology, hydrophytic vegetation, and soils) to be considered a wetland; it contained only one parameter, hydrology. The USACE would have jurisdiction over 0.005-acre of non-wetland WOTUS (REF #9).

The RWQCB would have jurisdiction over the feature identified as ephemeral waters, as defined by indicators of OHWM. A total of 0.005-acre of Waters of the State under the jurisdiction of the RWQCB occur on the Project Site (REF #9).

Drainage B consists of a channelized structure and lacks riparian vegetation; therefore, CDFW jurisdiction is defined as limited to the top of bank. A total of 0.014-acre of waters under the regulatory authority of the CDFW occurs on the Project Site (REF #9).

Project Impacts

No development or disturbance is proposed within the potential jurisdictional limits of the drainages. Pursuant to Ventura County’s Initial Study Biological Assessment (ISBA) requirements, a minimum setback distance for development from a significant wetland habitat is 100 feet. The Project incorporates the following Mitigation Measure to ensure that site grading and development is setback a minimum of 100 feet from Drainage A and 140 feet from Drainage B.

- BIO-5      Alamos Creek Buffer.** Site grading and development must remain at least 100 feet away from the top of the bank of Alamos Creek to the west (Drainage A),

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and at least 140 feet away from the edge of the existing concrete drainage feature to the east (Drainage B).

Furthermore, as discussed in greater detail in response to Checklist Question VII (b), the Project would be subject to the erosion and sedimentation control requirements of the California Statewide Construction General Permit during construction. During operation, the Project would be required by the Ventura County Municipal Separate Storm Sewer System to implement low impact development features to reduce urban runoff pollution. Through adherence to adequate setbacks from the onsite drainages and regulatory requirements for the control of erosion and runoff during construction and implementation of mandatory design features to control and/or treat runoff during operation, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Impacts would be less than significant.

- d) 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?

Within large, open space areas where few or no man-made or naturally occurring physical constraints to wildlife movement are present, wildlife corridors may not yet exist. However, once open space areas become constrained and/or fragmented as a result of urban development or the construction of physical obstacles (e.g., roads and highways), the remaining landscape features or travel routes that connect the larger open space areas become corridors as long as they provide adequate space, cover, food, and water and do not contain obstacles or distractions (e.g., man-made noise, lighting) that would generally hinder wildlife movement.

The Project Site is located within the Santa Monica – Sierra Madre Regional Wildlife Corridor (REF #13). The Project Site is surrounded by commercial development to the south, east, and west. Open space is present across the railroad tracks to the north. Wildlife could move along the onsite drainage (Drainage A) under the railroad tracks to reach the open space to the north. An unmaintained asphalt road, Los Alamos Canyon Road, occurs in the open space and provides an undercrossing beneath SR-118, which would allow wildlife to reach Alamos Canyon, a major wildlife corridor leading north. Wildlife could also move along the onsite drainage under West Los Angeles Avenue to the southwest and could continue following the drainage (a constrained linkage) through developed areas for approximately 0.25-mile to reach the larger Arroyo Simi, which is a wildlife corridor. While the upland habitat on the Project Site is considered a “dead-end” because it is surrounded by development, the drainage on the Project Site provides a constrained linkage between Alamos Canyon to the north and the Arroyo Simi to the southwest (REF #9).

As discussed in response to Checklist Question IV(c), there is no development or disturbance within Drainage A or B, and all Project construction and operational activities would be setback a minimum of 100 feet from Drainage A and 140 from Drainage B. Existing construction regulations and operational standards would ensure that impacts to the water quality of the drainages would not occur. Accordingly, the Biological Assessment and Jurisdictional Delineation report concluded that the Project would not interfere

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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 impacts would occur.

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Local policies and ordinances protecting biological resources include the Simi Valley City Urban Restriction Boundary, the Mature Tree Preservation Ordinance (Chapter 9-38 of the SVMC), and the Hillside Performance Standards (Chapter 9-32 of the SVMC). The Project Site is not located within the Urban Restriction Boundary (REF#11) or within the boundaries of the Hillside Performance Standards (REF#10); therefore, these policies and ordinances do not apply to the Project. However, the Project would be subject to the City's Mature Tree Ordinance.

The Mature Tree Preservation Ordinance prohibits the removal, cutting down, relocation, or other destruction of any tree, including Historic Trees, Mature Native Oak Trees, Mature Trees, Native Oak Trees, and all Historic/Mature Native Oak/Mature Trees which are associated with a proposal for urban development or are located on a vacant parcel) without first obtaining a Tree Removal Permit, which requires preparation of a Tree Report, replacement or relocation of trees, and payment of fees equal to the appraised value of the trees to be removed. Section 9-38.050 of the SVMC also establishes guidelines for tree removals associated with urban development (such as the Project) which emphasizes the desirability of preserving protected trees, appropriate safeguard considerations, practicality of preserving all healthy trees, and the proposed preservation plan.

A Tree Report was prepared for the Project (REF #28) and was incorporated into the Biological Assessment and Jurisdictional Delineation (REF #9). As determined by the Tree Report, the Project would require removal of four mature oak trees and would encroach upon the dripline of one additional mature oak tree. In addition, the Project would remove two non-native mature pepper trees; however, one of these mature pepper trees to be removed is dead and the second has poor structure and is not suitable to preserve due to its high risk of structural failure (REF#12). The Project would be required to adhere to the Mature Tree Preservation Ordinance and obtain a Tree Removal Permit for the removal and replacement of any and all trees. Pursuant to the requirements of Chapter 9-38, the Permittee would submit a Tree Report meeting the guidelines contained in SVMC Section 9-38.040 for review by the Environmental Services Department Director (the "Director"). The Director would evaluate the Project's Tree Report and review the Project's development plans for compliance with the Mature Tree Preservation Ordinance in consideration of proposed protection and safeguard considerations. Conditions of approval for tree removals, replacements, and protection as determined by the Director would be incorporated into the Project's permits. Compliance with all regulations and standards of the Mature Tree Preservation Ordinance and any conditions established for the Project by the Director would be ensured through submittal and review of grading and precise landscape plans to be approved by the Director and the City Engineer as required by Section 9-38.050 of the SVMC.

Additionally, pursuant to the West End Specific Plan, the impact of the removal of any Oak trees must be mitigated by the following mitigation measure:

- BIO-6 West End Specific Plan Oak Tree Removal.** The removal of any Oak trees identified in the Tree Report (Lee Newman & John Oblinger, Tree Report for

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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West Los Angeles Avenue, Simi Valley, December 9, 2022. Revised November 8, 2023 on file with the City of Simi Valley) trees on site must be mitigated by planting Coast Live Oak (*Quercus agrifolia*) on a three-to-one basis in locations approved by the Environmental Services Director of the City of Simi Valley. If planting on site is not possible, a mitigation amount as determined by the Environmental Services Director of the City of Simi Valley must be paid to the City's tree fund.

Through mandatory adherence to Chapter 9-38 of the SVMC as ensured through development plan check, and the above mitigation measure, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?
- 

The City, including the Project Site, is not located within the boundaries of any Habitat Conservation Plans, Natural Community Conservation Plans, or any other approved local, regional, or state habitat conservation plans. As such, the Project would not have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan; no impact would occur.

V. CULTURAL RESOURCES: Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?
- 
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5?
- 
- c) Disturb any human remains, including those interred outside of formal cemeteries?
- 

(a-c) A cultural resources records search was performed for the project, which identified one previously recorded prehistoric resource within the project site and six other cultural resources within a 0.5-mile radius of the site. A Phase I Archaeological Survey (REF #14) was completed, which found little evidence of remaining cultural resources within the proposed project site. An excavation of two shovel test pits to a depth of 100 centimeters also did not recover any cultural materials. An Extended Phase 1 (XPI) archaeological investigation was also conducted, and did not identify any cultural materials within the project site. Based on the results of these investigations, there is no potential impact to cultural resources on site. However, the Permittee has agreed to comply with Mitigation Measure **CUL-1** to ensure that any impacts to cultural resources encountered during the construction of the project site are mitigated to less than significant.

**CUL-1 Unanticipated Discovery of Cultural Resources.** In the event intact cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt, and an archaeologist meeting the Secretary of the

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Interior’s Professional Qualifications Standards for Archaeology (National Park Service 1983) must be contacted immediately to evaluate the find. If the discovery proves to be eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, additional work such as data recovery excavation and/or Native American consultation to treat the find may be warranted as ordered by the Environmental Services Director of the City of Simi Valley.

Therefore, with the incorporation of the above mitigation measures, there is a less than significant impact on the environment from an adverse change in the significance of any historical or archaeological resources on the site or the disturbance any human remains.

VI. ENERGY: Would the project:

- a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

(a-b) As part of the General Plan update, the City adopted a Climate Action Plan (SV-CAP) that identifies energy reduction measures, includes a requirement that new development not exceed 2008 Title 24 Part 6 Energy Standards of the California Code of Regulations by 20 percent, as well as water use reduction measures to reduce water demand by 20 percent. The Project will be required to comply with a number of ordinances that implement the goals of the SV-CAP. (Refer to further discussion under Greenhouse Gas Emissions, Section VIII. of this document.)

Simi Valley has adopted an Energy Reach Code, which adopts energy efficiency performance standards that are stricter than what is required by Title 24 of the California Code of Regulations minimums. The main focus of the City’s Reach Code is on efficiency measures that are simple to achieve and enforce and have the greatest influence on community sustainability. The Reach Code increases energy efficiency requirements for residential and nonresidential structures beyond Title 24 of the California Code of Regulations, set at 10 and 15 percent, respectively, for new construction and substantial remodels. Chapter 9-39 of the SVMC promotes trip reduction and alternative transportation methods (e.g., carpools, vanpools, public transit, bicycles, walking, park-and-ride lots, improvement in the balance between jobs and housing, etc.), flexible work hours, telecommuting, and parking management programs to address traffic increases from new development. The City’s Water Conservation Program (Chapter 6-11 of the SVMC) is aimed at reducing water consumption within the City through conservation, effective water supply planning, and prevention of waste, and maximizing the efficient use of water within the City. The Water Conservation Program is designed to reduce water use in the City to at least 15 percent below the 2009 baseline. The City is an early adopter of the CALGreen Building Code, which is intended to improve sustainability of the built environment and reduce GHG emissions from new construction. The Water Conservation Program goes further by including a California Energy Code--approved Energy Reach Code, additional landscape water conservation, and increased recycling. Therefore, the Project would not result in a significant impact with respect to wasteful, inefficient, or

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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unnecessary consumption of energy resources, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS: Would the project:

a) Directly or indirectly cause 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.

The California Geological Survey establishes regulatory zones, called Alquist-Priolo Earthquake Fault Zones, surrounding the surface trace of active faults in California. These zones identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. For the purposes of the Alquist-Priolo Act, an “active” fault is one that has ruptured in the last 11,000 years (or a Holocene-active fault).

The Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards (REF#13) and no Holocene-active or pre-Holocene faults with the potential for surface fault rupture are known to pass directly beneath the Site (REF#14). As such, the potential for surface rupture due to faulting occurring beneath the Site during the design life of the Project is low. In addition, the Project would not involve mining operations or deep excavation that could create unstable seismic conditions or stresses in the Earth’s crust. Accordingly, the Project would not exacerbate existing fault rupture conditions. Therefore, the Project would not cause substantial adverse effects due to rupture of a known earthquake fault and no impact would occur.

ii) Strong seismic ground shaking?

Although no faults are known to cross the Project Site, the Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on any of the many active faults in the region. The closest fault zone associated with a surface trace of an active fault to the Project Site is the Simi-Santa Rosa Fault Zone located approximately 0.5-mile to the south (REF#13). Other regional fault zones with surface traces include the San Cayetano Fault Zone, Oak Ridge Fault Zone, Sierra Madre Fault Zone, and Wright Road Fault Zone, located approximately 8 miles north, 8.3 miles northwest, 15 miles east, and 17 miles west of the Site, respectively; and the San Andreas Fault Zone is located approximately 36 miles northeast of the Site (REF#13). In addition, several buried thrust faults, commonly referred to as blind thrusts, underlie the Southern California area at depth. These thrust faults and others in the Los Angeles area are not exposed at the surface and do not present a potential surface fault rupture hazard at the Site; however, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking. Accordingly, the Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City’s General Plan Safety Element, and the Simi Valley Building Code (SVBC). Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction.

Chapter 11 of the SVBC adopts, with local City amendments, the 2022 California Building Code (CBC), which incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Project would be required to comply with the building design standards of the CBC, as adopted and amended, and would be required to incorporate structural features, foundation modification, and improved materials and construction methods that reflect seismic and geologic safety standards intended to mitigate adverse seismic impacts upon structures. The Simi Valley Building Official (Building Official) is responsible for implementing the provisions of the Simi Valley Building Code. The Building Official would ensure that the Project’s design meets the seismic standards appropriate to the Site and its seismic design category and spectral response as part of the Project’s development application before the issuance of building permits.

Furthermore, given the nature of the proposed industrial uses, completion of the Project would not cause seismic ground shaking to occur. The Project would not involve mining operations, deep excavations into the earth, or borings of large areas and thus would not exacerbate potential onsite seismic conditions. As a result, the Project would not directly or indirectly cause potential substantial adverse effects due to strong seismic ground shaking, and impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

The western portion of the Project Site is mapped within an area where historic occurrences of liquefaction or geological, geotechnical, and groundwater conditions indicate a potential for liquefaction to occur according to the California Geological Survey (REF#13). Pursuant to California Seismic Hazard Mapping Act requirements for developments proposed within seismic hazard zones (e.g., Liquefaction Zones), the Project is required to perform site-specific geotechnical investigations to assess the potential for liquefaction under specific earthquake conditions before construction. Accordingly, the City required the Permittee to provide site-specific data on the geologic and subsurface conditions related to liquefaction potential and to perform liquefaction and seismic induced settlement analyses of the subsurface materials at the Project Site (REF#15).

The data and analyses provided to the City indicate a potential seismic induced settlement at the Site of approximately 2.5 inches with a potential differential settlement of approximately 1.75 inches (REF#16). The Project’s geotechnical consultant recommends incorporation of a cap of compacted fill, of sufficient thickness as will be determined by the Project geotechnical consultant and approved by the City, into the Project grading plans to act as an attenuation/buffer zone at the Project Site. The Project’s geotechnical consultant concluded that the Project is considered feasible from a geotechnical engineering



Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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perspective, provided that this recommendation is made part of Project plans and implemented during construction. Incorporation of this, and all site-specific geotechnical recommendations, into Project plans would be ensured by the Building Official as part of the City’s normal building permit process. Implementation of all site- and project-specific geotechnical recommendations would be ensured through monthly in-grading reports, including geologic inspections made by the Project’s geotechnical consultant, and an as-built grading/compaction report, which would be prepared pursuant to the City’s Guidelines for Geotechnical Reports (REF#17). As further established by these Guidelines, in the event unanticipated adverse conditions are encountered during geologic inspections, the Building Official may require the cessation of construction until the impact of the condition(s) can be properly assessed, ensuring that the Site is adequately prepared and that all geologic conditions are addressed before construction and occupation of the Project.

Through mandatory implementation of site- and project-specific recommendations for Project design and grading, the Project would not directly or indirectly cause potential substantial adverse effects due to liquefaction. Impacts would be less than significant.

iv) Landslides?

The Project Site is not located within a landslide zone as designated by the California Geological Survey (REF#13). In addition, there are no historical landslides identified on or adjacent to the Site in the City’s General Plan EIR (REF#18). However, the California Geological Survey identifies a probable dormant landslide located to the northwest across W. Los Angeles Avenue from the Project’s northwest corner (REF#19). In addition, though not identified on the above State and City landslide maps, the City required the Project to provide a cross-section of an additional small landslide located to the north across W. Los Angeles Avenue from the Project’s northeast corner (REF#15). As shown in the provided cross-section, the dormant landslide and adjacent slope would be completely removed by the Project’s proposed grading. Project grading plans would be reviewed and approved by the Building Official as part of the normal grading permit process. In addition, the geologic conditions of the Site during construction would be confirmed by the geotechnical consultant as part of the monthly in-grading reports and as-built grading/compaction report, which would be prepared pursuant to the City’s Guidelines for Geotechnical Reports. As further established by these Guidelines, in the event unanticipated adverse conditions are encountered during geologic inspections, the Building Official may require the cessation of construction until the impact of the condition(s) can be properly assessed, ensuring that the Site is adequately prepared and all geologic conditions are addressed before construction and occupation of the Project.

Through mandatory implementation of site- and project-specific recommendations for Project design and grading, the Project would not directly or indirectly cause potential substantial adverse effects due to landslides. Impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

Because Project construction would involve ground disturbance in excess of 1 acre, grading and construction would be completed in accordance with the requirements outlined in the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (2009-0009-DWQ) Construction General Permit (effective July 1, 2010) (NPDES Construction General Permit), which includes the development of

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a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP identifies potential water quality pollutants (including erosion-induced sedimentation), identify minimum best management practices (BMPs), and develop a construction site monitoring plan for the Project. In addition, pursuant to Section 6-12.501 of the SVMC, grading and construction would be completed in accordance with a City-mandated Stormwater Pollution Control Plan, which would include BMPs to control wind and water erosion. The Stormwater Pollution Control Plan would be prepared in accordance with the Ventura Countywide Stormwater Quality Management Program, NPDES Permit No. CAS0040002, and any other requirements by the City’s Public Works Department. The NPDES Permit also requires projects to implement low-impact development (LID) features during operation in order to reduce urban runoff pollution to the “maximum extent practicable.” In addition to preventing the discharge of pollution, LID features also prevent erosion and siltation. Based on the above, the Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

- 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.

As discussed above, the Project’s impacts with regard to landslide and liquefaction would be less than significant through implementation of site- and project-specific recommendations for Project design and grading. Lateral spread is a type of liquefaction-induced ground failure that occurs on gentle slopes or near free-faces, such as river channels, resulting in horizontal displacement of soil. Because lateral spreading is the lateral movement of soils that have undergone liquefaction, implementation of the identified site- and project-specific recommendations for Project design and grading would also address the potential for lateral spread at the Site.

Subsidence is the gradual settling or sudden collapse (i.e., compaction) of the soil surface due to the removal of subsurface materials, most often groundwater, oil, natural gas, or mineral resources. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Site is not located within an area of known ground subsidence (REF#20) and no large-scale extraction of subsurface materials will occur at or in the vicinity of the Site. In addition, the Project would not require and does not propose the direct withdrawal or extraction of subsurface materials, the removal of which could cause subsidence.

Collapsible soils are generally dry, low density, silty soils with high void space or air gaps between the soil grains that compact and collapse when saturated with water. Soil collapse can occur just by the weight of the soil itself or the weight of a structure, such as a foundation. Soil collapse is typically addressed during grading techniques involving removal of identified collapsible subsurface materials and compaction of materials underlying building foundations to compaction standards compatible with the anticipated loads of proposed structures. Proper grading and site preparation by the Project would be ensured through compaction tests, which are a required component of the Project’s as-built report (REF#15). Furthermore, the Project’s geotechnical consultant has determined that infiltration is infeasible at the Site and runoff would ultimately be pumped to the existing municipal stormwater drainage system, thereby preventing the saturation of the soil beneath the Site or adjacent properties (REF#21).

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Based on the above information, the Project Site is not located within a landslide zone and there are no historical landslides identified on or adjacent to the Site. However, the California Geological Survey identifies a probable dormant landslide located to the northwest across W. Los Angeles Avenue from the Project's northwest corner (REF#19). The dormant landslide and adjacent slope would be completely removed by the Project's proposed grading. Project grading plans would be reviewed and approved by the Building Official as part of the normal grading permit process.

Based on the above, geologic unit instability would be addressed through standards for grading based on site-specific conditions and project-specific design. In addition, the Project would not result in unstable soil conditions as temporary excavations would be supported with sloping or shoring measures to ensure stable excavations and retaining wall design and drainage would achieve the support required based on anticipated soil pressures and forces. The Project would not involve excavation of a hillside and does not propose the ongoing withdrawal or extraction of subsurface materials. As such, the Project would not cause conditions related to unstable soil. Furthermore, development of the Project would occur in compliance with regulatory requirements for construction site management and geologic conditions, including the California Building Code and the SVMC. Compliance with building codes would be confirmed by the City's Building Official through the review and approval of Project grading plans before the issuance of construction and grading permits and ensured by the geotechnical consultant as part of the monthly in-grading reports and as-built grading/compaction report, which would be prepared pursuant to the City's Guidelines for Geotechnical Reports. Therefore, impacts related to unstable soil would be 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?

Expansive soils are soils that expand when water is added and shrink when dry. Site preparation and grading methods, such as removal of unsuitable soil, soil compaction, soil mixing, and moisture conditioning before and during foundation installation, as well as use of appropriate types of foundations for site- and project-specific conditions, is typically used to preventatively address expansive soil during site development. Pursuant to the Engineering-Level/Plan Check requirements established for the Project by the City, the expansion potential of the finish grade materials would be determined at the completion of grading and foundation design recommendations would be revised if the expansion potential of finish grade materials substantially differs from the assumed range (REF#15). Compliance with appropriate grading and foundation design recommendations would be ensured by the geotechnical consultant as part of the monthly in-grading reports and as-built grading/compaction report, which would be prepared pursuant to the City's Guidelines for Geotechnical Reports. Accordingly, the Project would not create substantial direct or indirect risk to life or property as a result of expansive soil. Impacts would be less than significant.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The Project would be served by the existing City sewer system, and no septic tanks or alternative wastewater disposal system would be required. As a result, no impacts would occur.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project Site is located within an area of High Paleontological Sensitivity (REF#22). In addition, the Project Site is undeveloped; therefore, grading and excavation would extend into subsurface materials that have not been previously disturbed. As such, construction activities have the potential to destroy paleontological resources in the event of their accidental discovery. Mitigation measures GEO-1 through GEO-3 would be required. Mitigation measures GEO-1 through GEO-3 require the retention of a qualified Project Paleontologist and Paleontological Monitor, preparation of a Paleontological Resources Impact Mitigation Plan (PRIMP) outlining procedures for workers' training, paleontological monitoring, and fossil protection and curation in the event of their discovery. Following implementation of mitigation measures GEO-1 through GEO-3, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts would be less than significant with mitigation incorporated.

**GEO-1 Paleontological Resources Impact Mitigation Plan and Paleontological Monitoring.** Before the commencement of ground disturbing activities, the Permittee must retain a qualified Project Paleontologist to direct all mitigation measures related to paleontological resources. A qualified Project Paleontologist is defined by the Society of Vertebrate Paleontology standards as a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator must have the equivalent of the following qualifications:

- a. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.
- b. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
- c. Proficiency in recognizing fossils in the field and determining their significance.
- d. Expertise in local geology, stratigraphy, and biostratigraphy.
- e. Experience collecting vertebrate fossils in the field.

The Project Paleontologist must be retained to prepare and implement a Paleontological Resources Impact Mitigation Plan (PRIMP) for the Project.

The PRIMP must be consistent with the 2010 Society of Vertebrate Paleontology guidelines and outline requirements for pre-construction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the Project Site based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management.

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**GEO-2 Worker’s Environmental Awareness Program.** Before the start of Project construction activities, all field personnel must receive environmental awareness training on paleontological resources by a qualified Project Paleontologist, as described above. The training must provide a description of the laws and ordinances protecting fossil resources, the types of fossil resources that may be encountered in the Project area, the role of the Paleontological Monitor, as defined below, steps to follow if a fossil discovery is made, and contact information for the Project Paleontologist. The training must be developed by the Project Paleontologist and must be delivered concurrently with other training including cultural, biological, safety, et cetera.

**GEO-3 Paleontological Monitoring and Fossil Discoveries.** Monitoring must be conducted by a qualified Paleontological Monitor, which is defined by the Society of Vertebrate Paleontology as having the equivalent of the following qualifications:

- a. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or
  - a. AS or AA in geology, paleontology, or biology and demonstrated two years’ experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or
  - b. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.
  - c. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

The Paleontological Monitor must be responsible for maintaining daily monitoring logs for those days monitoring occurs. The duration and timing of the monitoring must be determined by the Project Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City of Simi Valley Environmental Services Director. If the Project Paleontologist determines full-time monitoring is no longer warranted based on the geologic conditions at depth, they may recommend that monitoring be reduced or cease entirely. Monitoring must be reinstated if any new ground disturbances are required, and reduction or suspension must be reconsidered by the Project Paleontologist at that time.

If a paleontological resource is discovered, the Paleontological Monitor must have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and, if appropriate, collected. If the resource is determined to be of scientific significance, the Project Paleontologist must complete the following:

Salvage of Fossils. If fossils are discovered, all work in the immediate vicinity must be halted to allow the Paleontological Monitor, and/or Project

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Paleontologist to evaluate the discovery and determine if the fossil may be considered significant. If the fossils are determined to be potentially significant, the Project Paleontologist (or Paleontological Monitor) must follow standard field procedures for collecting paleontological resources as outlined in PRIMP for the Project. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the Project Paleontologist and/or Paleontological Monitor must have the authority to temporarily direct, divert, or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner.

Fossil Preparation and Curation. The PRIMP for the Project must identify the museum that has agreed to accept fossils that may be discovered during Project related excavations. Upon completion of fieldwork, all significant fossils collected must be prepared in a properly equipped laboratory to a point ready for curation. Preparation may include the removal of excess matrix from fossil materials and stabilizing or repairing specimens. During preparation and inventory, the fossilized specimens must be identified to the lowest taxonomic level practical before curation at an accredited museum. The fossil specimens must be delivered to the accredited museum or repository no later than 30 days after all laboratory work is completed. The cost of curation must be assessed by the repository and is the responsibility of the Permittee.

A paleontological monitoring report must be prepared within 60 days following completion of ground disturbance and submitted to the City of Simi Valley Environmental Services Director for review. This report must document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report must be submitted to the South Central Coastal Information Center and the Society of Vertebrate Paleontology.

VIII. GREENHOUSE GAS EMISSIONS: Would the project:

The following greenhouse gas (GHG) discussion is based in part on setting information and analysis data provided in the Air Quality, Greenhouse Gas Emissions, and Energy Report prepared for the Project by ENVICOM Corporation in March 2023 (REF#1). As previously explained, the modeled emissions presented below are a conservative estimate of actual Project emissions as a result of larger land use and earlier construction start date inputs.

The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Since the Industrial Revolution began around 1750, human activities have contributed substantially to climate change by adding carbon dioxide (CO<sub>2</sub>) and other heat-trapping gases to the atmosphere. These GHG emissions have increased the greenhouse effect and caused Earth's surface temperature to rise. The primary human activity affecting the amount and rate of climate change is GHG emissions from the burning of fossil fuels. The Intergovernmental Panel on Climate Change developed the global warming potential concept to compare the ability of each GHG to trap

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heat in the atmosphere relative to another gas. The reference gas used is CO<sub>2</sub>; therefore, global warming potential–weighted emissions are measured in metric tons of CO<sub>2</sub> equivalent.

Significance Thresholds

Individual projects do not generate sufficient GHG emissions to influence climate change directly. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. Assessing the impact of climate change involves analyzing whether a project's contribution towards climate change would impact the City's cumulative climate goals, "Cumulatively considerable" means the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (14 CCR 15064[h][1]).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance for GHG emissions. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts (see CEQA Guidelines Section 15064.7(c)). To date, however, no quantitative GHG emissions significance threshold for general use in the environmental review process that would apply to the Project have been adopted by a local, regional, or state agency per the requirements of CEQA Guidelines Section 15064.7(b). As such, for this analysis, the potential significance of the Project's GHG emissions will be qualitatively evaluated based on 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 greenhouse gas emissions" (CEQA Guidelines Section 15064.4(b)).

Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

(a-b) During construction, the project would generate GHG emissions primarily from the use of internal combustion engines to power onsite equipment as well as offsite transportation of workers and materials. During operations, the project would generate GHG emissions from area sources, energy use, mobile, water use, and waste disposal. Area sources include emissions from consumer product use (such as cleaning supplies), architectural coatings such as paints (averaged on an annual basis assuming all surface areas are repainted once every 10 years), and landscape maintenance equipment (i.e., lawn mowers, leaf blowers, etc.). Energy sources include electricity and natural gas use. Mobile sources include on-road motor vehicle use by occupants, customers, guests, etc.

As discussed above, no state, regional, or local agency with jurisdiction over the Project Site has adopted a numeric threshold for determining the potential significance of GHG emissions that would apply to the Project. However, pursuant to CEQA Guidelines Section 15064.4(a), which states that "A lead agency must make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project," the Project's estimated annual GHG

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emissions were calculated and are presented in Table VIII-1, Annual Project-Related Greenhouse Gas Emissions, for information purposes only.

Table VIII-1, Annual Project-Related Greenhouse Gas Emissions

Emissions Source	Estimated Project-Generated Emissions (MTCO <sub>2</sub> e per year)
Area Sources	-- <sup>1</sup>
Energy Utilization	178.9
Mobile Source <sup>2</sup>	287.6
Offroad <sup>3</sup>	92.4
Solid Waste Generation	42.5
Water Consumption	58.1
Construction <sup>4</sup>	11.3
Project Total	670.8

MTCO<sub>2</sub>e = metric tons of CO<sub>2</sub> equivalent

1 Statistically insignificant.

2 CalEEMod Version 2020.4.0 includes N<sub>2</sub>O emissions from vehicles.

3 California Air Resources Board (CARB) Off Road Diesel Models and Documentation (REF #32)

4 Consistent with guidance from the SCAQMD, construction Emissions have been amortized over a 30-year period.

Source: CalEEMod modeling outputs for the Project (see Appendix A of the Project's Air Quality, Greenhouse Gas, and Energy Report [REF#6]).

### Plan Consistency

#### SCAG RTP/SCS

The SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted September 3, 2020, is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The RTP/SCS plans to accommodate future growth through intensification of residential and commercial land uses in urban areas to reduce vehicle miles traveled (VMT), which would reduce emissions of GHGs in the transportation sector, the largest contributing sector to statewide GHG emissions. Specific strategies are included in the RTP/SCS in order to achieve identified goals to: (1) Focus Growth Near Destinations and Mobility Options; (2) Promote Diverse Housing Choices; (3) Leverage Technology Innovations; (4) Support Implementation of Sustainability Policies; and (5) Promote a Green Region.

While the support and implementation of several of these goals is the responsibility of SCAG and/or local or regional government entities and not the Project, the Project would not conflict with their implementation. Furthermore, the Project Site is located in an area with clustered development of industrial and light industrial uses. This agglomeration of industrial activity serves to create a centralized employment area that could benefit from an increase in mass transit in the future. In addition, the Project would provide electric vehicle (EV) chargers onsite and would utilize solar photovoltaic (PV) panels for the proposed building. Accordingly, the Project would not conflict with SCAG's RTP/SCS (REF#1).



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Climate Change Scoping Plan

In 2008, the California Air Resources Board (CARB) adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan), which establishes an overall framework for measures to reduce statewide GHG emissions for various sources/sectors to 1990 levels by 2020, consistent with the reduction targets of Assembly Bill 32 (AB 32). The Scoping Plan was updated in 2014, 2017, and most recently in 2022. The 2022 update to the Scoping Plan revises CARB’s strategy to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The Scoping Plan identifies actions to reduce GHG emissions under a variety of sectors. Many of these are not applicable to the Project; however, the sectors and associated actions the Project would support include those related to: (1) GHG Emissions Reductions Relative to the SB 32 Target; (2) Smart Growth / Vehicle Miles Traveled (VMT); (3) Light-Duty Vehicles (LDVs) Zero Emissions Vehicle (ZEVs); (4) Truck ZEVs; (5) Electricity Generation; (6) New Residential and Commercial Buildings.

The Project proposes a light industrial building in an area developed with other industrial and light industrial uses. This would provide more employment opportunities for nearby residents and within in a localized area that may encourage carpool/vanpool activity. The Project would be subject to the standards of the Green Building Standards Code (Title 24, Part 11), as well as the Building Energy Efficiency Standards (Title 24, Part 6) in effect at the time building permits are issued. The Project would install solar PV panels on the proposed building and provide required EV parking spaces and chargers. Although there is not dedicated infrastructure for Medium-Duty Vehicle/Heavy-Duty Vehicle (MDV/HDV)-specific charging, there are no Project impediments to possible future implementation. Thus, the Project would support efforts of the energy sector to achieve GHG emissions reduction planning targets and help meet increased demand for electrification. Additionally, HVAC units installed for the Project will be electric and the proposed development would be required to comply with use of approved refrigerants. Accordingly, the Project would not conflict with the Climate Scoping Plan (REF#1).

Simi Valley Climate Action Plan

The City of Simi Valley Climate Action Plan (CAP), which was adopted on June 4, 2012, was prepared to reduce and encourage reductions in GHG emissions from all sectors within the City by 15 percent by 2020 as compared to a 2006 baseline. The CAP contains strategies and project-level measures within the energy, solid waste, and transportation sectors. Specifically, the CAP includes measures for a: (1) Commercial Energy Efficiency Program; (2) Commercial/Industrial Renewable Energy Program; (3) Water Use Reduction Initiative; (4) City Diversion Program; (5) Anti-Idling Enforcement; and (6) Expand Renewable Fuel/Low Emission Vehicle Use.

The Project would be required to comply with California Code of Regulations Title 24 Part 11, the Green Building Code, and would provide solar photovoltaic panels on the roof of the proposed building and EV chargers as required by Code. Furthermore, the Project would be subject to the 2022 California Energy Code, which surpasses the 2012 targets established in the CAP. The Project would be required to comply with the City’s water use restrictions on time, area, frequency, and duration of specified allowable water usages. The Project also includes drought tolerant landscaping which would further reduce water use. The Project would comply with the California Green Standard Building Code mandatory construction and demolition waste recycling percentages. In addition, the

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Project would comply with solid waste diversion programs and include recycling infrastructure (recyclable storage areas) as part of the Project in compliance with the California Green Standard Building Code. Construction equipment and vehicles and diesel-fueled delivery trucks making deliveries to the Project Site during both construction and operation would be subject to California’s anti-idling laws, which limit idling to five minutes or less. Therefore, the Project would not conflict with the CAP (REF#1).

Conclusion

In the absence of an adopted quantitative threshold for determining the potential significance of GHG emissions that would be applicable to the Project, in accordance with CEQA Guidelines Section 15064.4(b)(3), the determination of the significance of the Project’s GHG emissions impact is based on a qualitative analysis considering the Project’s consistency with applicable statewide, regional, and local plans adopted for the purpose of reducing GHG emissions. The Project would be required to comply with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions as well as energy conservation standards of California Code of Regulations Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards (Part 11). As discussed above, the Project would be consistent with the 2020-2045 RTP/SCS, the implementation of which CARB has stated would achieve the per capita reduction in GHG by 2035, relative to 2005 levels, as established by CARB for the region. The Project also would be consistent with the policies of the 2022 Scoping Plan Update and with the City’s CAP. Therefore, based on the CEQA Guidelines for determining the significance of GHG emissions, the currently available adopted plans for reducing GHG emissions applicable to the Project, and the absence of applicable adopted quantitative significance thresholds, potential impacts related to greenhouse gas emissions would be less than significant (REF#1).

IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

(a-b) The storage, handling, or use of any hazardous materials is regulated by State and local regulations. The California Building Code regulates the types and amounts of hazardous substances allowed in conventional structures (REF#17). Storage of any amount of hazardous materials is subject to the Ventura County Fire Protection District and Ventura County Environmental Health Department regulations. These regulations limit the amount of hazardous materials that can be stored in these facilities so that public safety is protected. The Project does not involve any handling of hazardous wastes or other hazardous materials. Additionally, the Project is required to comply with the Ventura County Municipal Storm Sewer System Permit. This will ensure that water leaving the site is properly filtered before it enters area waterways. Therefore, there is no potential for a significant impact to the environment from a significant hazard to the public or the environment through the routine transport, use, disposal, or accidental release of hazardous materials.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The Project site is over one-quarter mile from any existing or proposed school. The nearest school is the Arroyo Elementary School located approximately 2.0 miles to the southeast. Therefore, there is no potential for a significant impact on the environment from hazardous emissions within one-quarter mile of an existing or proposed school.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The Project site is not listed on the Department of Toxic Substances Control, Envirostor database. This database lists all sites pursuant to California Government Code requirements. Therefore, there is no potential for a significant impact to the environment from a hazardous material.

- e) For a project 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, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The closest airport is the Van Nuys Airport, located approximately 26.5 miles southeast of the Project site. The Project site is not located within an airport land use plan area or within two miles of a public or private airport. Therefore, there would be no impact for the Project related to safety hazards or excessive noise from airport related uses.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

There is direct access to the site from two driveways on West Los Angeles Avenue providing access for emergency vehicles. The Ventura County Fire Protection District has deemed this access sufficient. The property is included in the City's emergency response and evacuation plan. Development of the property has been anticipated by these plans and there is no need to amend the existing procedures. Therefore, there is no potential for a significant impact to the environment from interference with an adopted emergency response or evacuation plan.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The Project site is identified as being within a High Wildfire Hazard Area, as shown in the Potential Wildfire Hazard Area Map in the City of Simi Valley General Plan (REF #18) and within a Local Responsibility Area (LRA), Very High Fire Severity Zone as mapped by the State Fire Marshal (REF #19). The Project would be required to comply with the minimum standards of the California Code of Regulations, Title 14, Division 1.5, Chapter 7, Article 6, Subchapter 2, "SRA/VHFHSZ Fire Safe Regulations" inclusive of fuel modification, access road, and fire sprinkler requirements. Therefore, there is no potential for a significant impact to people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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X. HYDROLOGY AND WATER QUALITY: Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The project is subject to City, County, and State regulations regarding water quality and discharge. The site will be designed to meet the requirements of the National Pollution Discharge Elimination System (NPDES) Municipal Separate Sewer Systems (MS-4) water quality treatment for the entire site through the use of post-construction Best Management Practices (BMPs).

The project will also be conditioned to implement stormwater pollution prevention plans before the start of construction, build stormwater detention and filtration systems per plans that must be approved before construction, and design the site to prevent uncontrolled runoff into natural watercourses. The Permittee must obtain permits from the County Watershed Protection District based on the above measures before constructing the project. The permits include regular monitoring by City and County staff for compliance. Based on these conditions, water discharged from site would not violate any water quality standards. Therefore, there is no potential for a significant impact to the environment from violating any water quality standards or waste discharge requirements.

- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The project would receive its domestic water supply from the existing distribution system. There is no proposal to use a well or groundwater from the site. Groundwater will not be used or depleted by this project. Therefore, there is no potential for a significant impact to the environment from depleting groundwater supplies or interfering substantially with groundwater recharge.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on or off-site?

According to the Preliminary Drainage Report for the project (REF #16), on-site drainage will be directed to an underground storm drain system, therefore, there would be very little exposed soil after construction, the project would not result in substantial soil erosion or siltation. Therefore, there is a less than significant impact to the environment from substantial soil erosion or the loss of topsoil.

- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?

The City requires projects to provide a minimum of 1,100 cubic feet of detention per acre of developed area. According to the Preliminary Drainage Report (REF #16), the project will provide a permanent subsurface storm drainage and stormwater pollutant mitigation system. This system consists of a continuous deflection separation (CDS)

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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unit, a Modular Wetland device, subsurface storage device and associated conveyance pipes. The system will be designed to convey the peak site runoff flows from a 100-year frequency storm event to a proposed subsurface retention and outlet flow metering box facility capable of satisfying the detention and stormwater pollution mitigation requirements. The basins provide an excess of the City's requirements of 1,100 cf/acre. Therefore, there is a less than significant impact to the environment from a substantial increase in the rate or amount of surface runoff in a manner which would result in flooding on or off site.

- 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?

The State NPDES MS4 permit requires all new development to treat the "first flush" of all storms. To mitigate potential stormwater pollutants, this project will install a permanent BMP as part of the proposed development using guidelines contained in the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures (TGM), 2011 Errata Update 2015 addition (REF #15). The unit has a specified treatment capacity of 2.0 cfs with a built in internal high flow bypass of 20.0 cfs. Per the SVMC Title 6, Chapter 12, Sec 6-12.301., additional treatment is required for the two proposed loading docks on the east and west sides of the proposed building. To satisfy this requirement, a single Contech Modular Wetland device is proposed to only treat runoff from the two loading docks, which will be approximately 0.06 cfs. A gravity pipe will connect the two proposed inlet catch basins within each loading dock to the Modular Wetland device. All the runoff from these two loading dock areas will be directed into this device; the required treatment flow will be treated within the device, while high flows will bypass the treatment area through an internal bypass, continue through the subgrade pipe system, and enter the proposed CDS unit. Therefore, there is a less than significant impact on the environment from exceeding the capacity of existing or planned stormwater drainage systems or an increase in polluted runoff.

- iv. Impede or redirect flood flows?

According to the Preliminary Drainage Report for the project (. #16), the project will drain into a series of onsite drain inlets and then enter the detention and stormwater quality system before discharging into a proposed connection to the northern curb and gutter within the West Los Angeles Avenue right of way south of the project site. All stormwater flows will be detained before leaving the site. Since on-site drainage will be directed to an on-site detention system that leads to a storm drain, the project will contain flood flow over current undeveloped conditions. Therefore, there is a less than significant impact to the environment from impeding or redirecting flood flows.

- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The project site is not located within a FEMA Special Flood Hazard Area (SFHA) or near a large body of water that would produce seiches (seismically induced waves), nor is the site located in a tsunami inundation area. Therefore, there is no potential for a significant impact to the environment from a release of pollutants due to project inundation.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The City requires projects to provide a minimum of 1,100 cubic feet of stormwater detention per acre of developed area. According to the Preliminary Drainage Report (REF #16), the Project will provide stormwater detention basins on site that exceed the City’s requirements of 1,100 cf/acre. In addition, under the conditions of the City’s National Pollutant Discharge Elimination System (NPDES) permit, development over one acre in size is required to install permanent filtration devices to clean runoff leaving the site. The project will meet the requirements of the latest Stormwater Quality Urban Mitigation Plan (SQUIMP) by installation of Stormwater filtration units meeting the Stormwater Quality Design Flow established by Ventura County. In addition, the standing water within the excavation area will be handled pursuant to State requirements governing the handling of such construction related groundwater. Based on these conditions, water discharged from the Project site would not violate any water quality standards. Therefore, there is a less than significant impact to the environment from conflicts with or obstruction of water quality control or groundwater management plans.

XI. LAND USE AND PLANNING: Would the project:

- a) Physically divide an established community?

The proposed project site is a vacant 7.67-acre area within an industrial zone. The City’s sanitation plant is located south of the Project site, approved RV storage lots are located to the southwest, vacant industrial land to the east, the Southern Pacific Railroad and vacant land to the north, and Alamos Canyon and vacant land to the west. The project will not expand beyond the current property boundaries. Therefore, the Project will not result in a significant land use impact due to the physical division of an established community.

- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed Project involves the development of a 66,431 square foot concrete tilt-up building (including a mezzanine) on 7.67 acres. Site improvements will include vehicular parking, pedestrian walkways and landscaping. The current General Plan Land Use designation of the Project site is Light Industrial (LI), and the Project site is zoned as General Industrial (GI) with a Sexually Oriented Business (SB) overlay. The property is also within the West End Specific Plan (WESP) area. The WESP was adopted in 1983 and was last amended in 2021. It is intended to provide objectives and standards for the development of industrial and “big box” commercial uses. The WESP is located between West Los Angeles Avenue to the south and unincorporated Ventura County to the north, First Street to the east and Oak Park county park to the west, with Highway 118 running through it. The project meets the findings of the General Plan and the WESP as detailed below.

- i. General Plan Land Use Policy LU-2.4 Employment Opportunities states, “Provide for a broad spectrum of land uses that offer job opportunities for Simi Valley’s residents, including commercial, office, industrial, and business parks”. The project will provide a 66,431 square foot office and warehouse space for 46 warehouse, office, laboratory, and business support staff. Therefore, the project complies with this policy.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- ii. General Plan Land Use Goal LU-5 Land Use Compatibility states, “New development is located and designed to assure a compatible relationship with adjoining uses”. The proposed Project is compatible with the existing RV and contractor storage facilities located to the south, in that, the building will be used for industrial purposes, such as warehousing, manufacturing, and related office functions. These uses are consistent with the industrial nature of RV and contractor storage facilities. A landscaped slope and West Los Angeles Avenue serve as a buffer between the Project and these uses. Additionally, the Project will be separated from surrounding vacant land by a 100-foot-wide railroad right-of-way to the north and Alamos Creek to the west.
  
- iii. West End Specific Plan, Protection of Mature Trees Policy 2.5.3.7 states “The impact of the removal of any mature tree must be mitigated pursuant to the requirements of SVMC Section 9-38 et seq. Mature native oak trees must be replaced by moving individual trees or replacing them by value. Oak trees must be replaced by planting Coast Live Oak (*Quercus agrifolia*) on a three-to-one basis”. Four (4) Coast Live Oaks and two (2) Peruvian Pepper trees will be removed from the site to accommodate the current project. To mitigate the loss of these trees, the Permittee is required to plant upsized replacement trees on-site in locations determined by the City’s Environmental Services Director or pay into the City’s Tree Mitigation Fund. The Project will also be conditioned to comply with the City’s Mature Tree Preservation Ordinance, SVMC Section 9-38 et seq, which requires the Permittee to obtain a tree removal permit. Therefore, the project complies with this requirement.
  
- iv. West End Specific Plan, Development Standard for Exterior Materials and Colors, 3.3.9.3.C states, “Building materials, colors, and textures must be compatible with those of adjacent or nearby buildings. In general, subdued earth-tone colors are recommended for the Plan area”. The building will consist of concrete tilt-up walls in varying shades of grey with copper-colored tile and corrugated metal siding accents. Additionally, metal canopies and awnings will be provided over windows and loading docks, and the retaining walls on site will be constructed of tan CMU blocks. The color scheme of the building and retaining walls will match the subdued earth-tone colors of the surrounding natural hillsides and buildings at the adjacent RV and contractors’ storage yards. Therefore, the project materials, colors, and textures comply with this standard.

The Project will meet the standards of the SVMC. These standards are established to require consistent and compatible development between adjoining properties, including screening utility equipment and landscaping to soften building exteriors and buffers between uses.

The Project is located adjacent to Los Angeles Avenue, which leads directly to other major arterials and SR-118. Traffic from the site would not have to travel through any residential neighborhoods in order to transport supplies or workers. Therefore, there is no potential for a significant impact from conflict with any applicable land use plans, policies, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. MINERAL RESOURCES: Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Based on the findings of the geotechnical site investigation, the site is underlain by bedrock and alluvium deposits (REF #20-21). Per the California Division of Mines and Geology, there are no known resources of value to the region in alluvium aside from sand and gravel for concrete aggregate and there are no mineral resources on the site (REF #22). The project is located in the area delineated as the Simi Oil Field on the California Department of Conservation, Division of Oil and Gas, District 2 Oil Field Maps. There are no oil or gas wells located on the property according to the California Department of Conservation, Division of Oil and Gas, Regional Wildcat Map, W2-1 (REF #23). Locally important mineral resources have been mapped by the State and included in the City's General Plan Land Use Element. The project is located outside the area identified as a natural resource area on the Land Use Map for the City's General Plan (REF #24). Therefore, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

As previously discussed, the Project site is located outside the area identified as a natural resource area on the Land Use Map for the City's General Plan (REF #24). Therefore, there is no potential for a significant impact to the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

XIII. NOISE: Would the project result in:

- a) Generation of 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?

Since noise is measured on a logarithmic scale, and traffic is the predominant source of noise in this area, noise impacts for the project were analyzed based on the traffic study for the project (REF #25). The project would need to produce 10 times the current amount of traffic (a 1,000-percent increase) in order to increase noise energy by 10 dB (A). Based on the City of Simi Valley's 2022 average daily traffic volumes, the current average daily trip (ADT) count for the section of West Los Angeles Avenue adjacent to the project is approximately 3,800 ADTs. Based on the current traffic study for the proposed project, the project will generate 324 ADT, which represents an 8.5-percent increase in ADTs as a result of the project. Since the project does not cause a 1,000-percent increase in traffic, ambient noise will not increase by 10 dB (A). Therefore, there is no potential for a significant impact to the environment from an increase in ambient noise levels in the project vicinity by 10 dB (A). Additionally, this type of use does not involve the generation of large amounts of traffic which could produce substantial, temporary, or periodic increases in ambient noise. Therefore, there is no potential for a significant impact to the



Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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environment from generation of 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.

- b) Generation of excessive groundborne vibration or groundborne noise levels?

The City of Simi Valley General Plan, identifies noise sensitive land uses as “residences, hospitals, rest homes, convalescent hospitals, places of worship, libraries, and schools” (REF #26). The environmental planner conducted a site inspection and determined that the Project is not adjacent to any noise-sensitive land uses as it is surrounded by existing industrial uses. The City's sanitation plant is located to the south, approved RV storage lots to the southwest, vacant hillsides to the east, and the railway line and vacant land to the north. Therefore, there is no potential for a significant impact from the Project from a generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity in excess of standards established in the local general plan or noise ordinance or from the generation of excessive groundborne vibration or groundborne noise levels.

- 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 is the Van Nuys Airport, located approximately 26.5 miles southeast of the Project site. The Project site is not located within an airport land use plan area or within two miles of a public or private airport. Therefore, there would be no impact for the project related to safety hazards or excessive noise from airport related uses.

XIV. POPULATION AND HOUSING: Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed project is located in an industrial area of the City, with surrounding existing industrial uses. The City's sanitation plant is located to the south, approved RV storage lots to the southwest, vacant hillsides to the east, and the railway line and vacant land to the north; therefore, the project will not require the extension of existing roads or infrastructure. The project will not result in the creation of residential units and the increase of 46 warehouse/ office jobs to the site is not considered substantial population growth. Therefore, there is no potential for a significant impact to the environment from substantial population growth in the area.

- b) Displace substantial numbers of people or existing people or housing, necessitating the construction of replacement housing elsewhere?

There are currently no dwelling units located on the property. Consequently, there is no potential for a significant impact to the environment from the displacement of any existing dwelling units.

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XV. PUBLIC SERVICES:

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Fire Protection

The property is located approximately 2.6 miles to the northwest from Ventura County Fire Station Number 45, located at 790 Pacific Avenue. The Fire District has determined that the standard response times can be maintained after development of the Project. During construction and subsequent operation, the proposed Project would not interfere with any of the daily operations of the City's Emergency Plans nor would it require additional staff from the VCFD. All construction activities, including staging, would occur on-site and would be required to be performed per the City's and VCFD's standards and regulations.

Ingress and egress points from West Los Angeles Avenue would be adequate for emergency services. The Project has been reviewed by the VCFD for conformance with applicable fire safety standards, resulting in recommended conditions of approval.

Police Protection

Police protection services in the City of Simi Valley are provided by the Simi Valley Police Department, which operates out of its police facility at 3901 Alamo Street, approximately 7.3 miles east of the Project site. The Police Department has established acceptable standards for Patrol Officer response times to calls for service in the City. The acceptable response times to emergency calls average 3.2 minutes, and non-emergency response times average 12 minutes. The Police Department tracks response times and is meeting these standards. To maintain these response times to the public, the Police Chief may reconfigure police beat boundaries; adjust deployment schedules for patrol shifts, or request funding for the creation of special task forces to deal with any increase in calls for service due to the proposed Project. Project development would not require the construction of new or expanded police facilities.

Schools

The Project would not generate additional students nor require the construction of a new school as no additional housing units are proposed. However, the Project may have a secondary impact from the new households of employees of the facility. The Project is subject to school impact fees in order to offset impacts to the Simi Valley Unified School District's requirements. Pursuant to State law, the payment of those impact fees would constitute full mitigation of any impacts on schools [Government Code Section 65996 (b)]. Therefore, there is no potential for a significant impact on the environment due to the need for new or altered school facilities.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Parks or other facilities

No additional housing units are proposed and as such the project would not have any impacts on parks and other facilities such as libraries, etc.

Therefore, there is no potential for a significant impact to the environment from substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services.

XVI. RECREATION:

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Demand for parks and recreational facilities in an area is usually determined by the area's population. The proposed Project would not add any new residential units. Existing parks or other recreation facilities would be able to accommodate the increase in park use generated by this Project. Therefore, there is no potential for a significant impact to the environment from an impact on recreation.

- b) 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?

The proposed Project would not add any new residential units. Existing parks or other recreation facilities would be able to accommodate the increase in park use generated by this Project. Therefore, there is no potential for a significant impact from construction or expansion of recreational facilities.

XVII. TRANSPORTATION: Would the project:

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Project Site is located immediately north of W. Los Angeles Avenue, which currently contains sidewalks along its southern side and a Class II Bike Path along its northern side, adjacent to the Project Site. There are no transit facilities located within the proximity of the Project Site; the nearest bus stop is the Madera Road and Los Angeles Avenue bus stop, which is located approximately 1.25-mile east of the Project Site with service for Simi Valley Transit Route 20. Programs, plans, ordinances, and policies addressing the circulation system within the City include the City's *General Plan* (REF#23), the *West End Specific Plan* (Specific Plan) (REF#24), and the *Simi Valley Bicycle Master Plan* (Bike Plan) (REF#25).

Pedestrian-friendly streetscapes, accessibility/connectivity, and safe and efficient accommodations for cars, transit, bicyclists, and pedestrians are Guiding Principles of the General Plan. To this end, Chapter 5: Mobility and Transportation, contains goals and policies to plan, develop, and maintain a safe and high-quality mobility system. With regard

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to transportation, the Specific Plan contains goals, design objectives, and development standards for the circulation system. In addition, the Specific Plan requires that “each developer in the Specific Plan area must be responsible for completion of frontage improvements on their specific project area – the need for which emanate from a project (development), and traffic impact fees.” The Bike Plan contains goals and objectives to provide convenient and safe bicycling to, from, and within Simi Valley and includes recommendations for implementation of expanded and improved bicycle facilities and programs. Bike Plan recommendations for W. Los Angeles Avenue include extending the existing Class II Bike Path beginning at Easy Street / W. Los Angeles and Madera Road westward to the City boundary with Moorpark, which has been completed.

The Project does not require or propose dedications or improvements to the public right-of-way, including roadways or sidewalks, and does not propose vacating or otherwise restricting public access to existing vehicular, pedestrian, or bicycle facilities. No modifications to the existing pedestrian network along the south side of W. Los Angeles Avenue, the Class II Bike Path along the north side, or the Route 20 bus stop at Madera Road and Los Angeles Avenue would occur. The Project would include bicycle lockers for employee and visitor use. In addition, the Project would include onsite, pedestrian-friendly features, such as enhanced pavement, crosswalks, sidewalks, and steps. Project vehicular access would be provided via two, two-way driveways along W. Los Angeles Avenue. The design of all proposed onsite bicycle, pedestrian, and vehicular improvements would be required to comply with the applicable standards and codes pertaining to accommodation and lines of sight to ensure the safety and compatibility of circulation system users, including cars, bicyclists, and pedestrians established in SVMC Section 9-34.090. Compliance with applicable regulations pertaining to the circulation system would be ensured through the City’s standard development review process. Project plans would be reviewed and approved by the Department of Public Works’ Principal Traffic Engineer and the City’s Building Official, as applicable. Any required revisions would be incorporated into the Project design before the issuance of building permits and must be reviewed by the Principal Traffic Engineer and the City’s Building Official, as applicable.

Through compliance with development review conducted as part of the normal project permitting process, the Project would not conflict with programs, plans, ordinances, and policies addressing the circulation system. Impacts would be less than significant.

- b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
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The State of California Governor’s Office of Planning and Research (OPR) issued proposed updates to the CEQA guidelines in November 2017 and an accompanying technical advisory guidance finalized in December 2018 (OPR Technical Advisory) that amends the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service and instead refers to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines to determine if the project will result in a substantial increase in vehicle miles traveled (VMT). The California Natural Resources Agency certified and adopted the CEQA Guidelines in December of 2018, and as of July 1, 2020, the provisions of the new section are in effect statewide. Concurrently, OPR developed the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which provides nonbinding recommendations on the implementation of VMT methodology, which has significantly informed the way VMT analyses are conducted in the State. Accordingly, for the purpose of environmental review under CEQA, the City of Simi Valley has established criteria for

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transportation impacts based on VMT for land use projects and plans which are consistent with the recommendations provided by OPR in the Technical Advisory.

Traditionally, public agencies have set certain thresholds to determine whether a project requires detailed transportation analysis or if it could be assumed to have less than significant environmental impacts without additional study. In compliance with Senate Bill 743, and in satisfaction of CEQA, the City of Simi Valley has determined the screening criteria for certain land development projects that are exempt from a VMT Analysis and may be presumed to result in a less than significant VMT impact. The following projects are exempt from a VMT Analysis:

- Projects that generate less than 110 trips per day (net) as calculated using Trip Generation.
- Standalone retail projects less than 50,000 square feet in gross floor area located within neighborhoods.
- Community-serving projects such as parks, libraries, or other projects deemed by the City Engineer to have a less than significant impact.
- Projects with 100% affordable residential units.
- Projects located within 0.5 miles of the Simi Valley Metrolink Station.
- Projects located within mapped areas of 5% below the City's background VMT as determined by the City Transportation Analysis Model.

The Project does not meet any of the screening criteria; therefore, a VMT analysis was conducted as part of the *Transportation Impact Study: On the Rise Project* (Transportation Study) prepared for the Project by Linscott, Law, & Greenspan, Engineers and dated December 1, 2023 (REF#26). The VMT analysis was prepared to determine whether the Project would result in a significant transportation impact. A project is considered to have an impact if it generates VMT per capita and/or per employee in excess of 5 percent less than the background VMT for the City. The Project would not generate a residential population; therefore, the applicable threshold for the Project is:

- Generation of VMT per employee greater than 10.35, which is 5 percent less than the background VMT per employee of 10.9.
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To conduct the VMT analysis, City staff utilized the City of Simi Valley Transportation Analysis Model (SVTAM). The peak modeled VMT for the Project was 13.1 VMT per employee for work-based trips, which is 26.6 percent above the City's threshold of 5 percent below background VMT of 10.35 VMT/employee for work-based trips and would be considered a significant impact (REF#26). Accordingly, mitigation measure TR-1 is included in the Project and requires implementation of transportation demand management (TDM) strategies to reduce VMT through commute trip reductions marketing, provision of a ridesharing program, and provision of end-of-trip bicycle facilities. Implementation of mitigation measures TR-1 would reduce VMT by 15.57 percent, resulting in a VMT per employee of 11.34 VMT, which would still exceed the City significance threshold of 10.35 VMT per employee.

However, as detailed in mitigation measure TR-2, the Permittee has agreed to participate in the Ventura County Vehicle Miles Traveled Adaptive Mitigation Program (VMT AMP) and pay a fair share cost of transportation fee of \$1,650.00 per employee before the Environmental Services Director issues a Zoning Clearance. This fee is payable to the City of Simi Valley and is calculated based on the fair share cost transportation fee per

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VMT AMP multiplied by the approved employee count at the time of payment, as determined by the Director of Public Works. The VMT AMP was developed by the Ventura Council of Governments (VCOG) and the Ventura County Transportation Commission (VCTC) as a multifaceted effort to provide clear and consistent application of VMT assessment and reduction strategies to streamline the CEQA process in Ventura County. Consistent with VCOG and VCTC guidance contained within the *Recommendations to CEQA Lead Agencies in Ventura County to Streamline CEQA Transportation Assessment and Mitigation*, “a fee program that was established prior to a CEQA assessment of a proposed project would not be able to be used as mitigation due to additional requirements, however participation in such a program could be substantial evidence of ‘avoidance and minimization measures’ or ‘environmental commitments’ which could be used to avoid or minimize VMT impacts as part of a project’s description” (REF#31). The Permittee would make the applicable fee payment to the City before the Environmental Services Director issues a Zoning Clearance. Accordingly, the Transportation Study concluded that “[b]y participating in the [VMT AMP], it is expected that the significant impact identified for the Project would be fully offset and therefore reduced to a less-than-significant level.” (REF#25).

In conclusion, with implementation of mitigation measure TR-1 and TR-2, which require the Project to implement TDM strategies and to participate in the VMT AMP through payment of the fair share cost of transportation fee of \$1,650.00 per employee, impacts related to the conflicts or inconsistencies with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant with mitigation.

Mitigation Measures

**TR-1 Transportation Demand Strategies.** The Permittee must implement the following transportation demand management strategies:

T-7: Implement Commute Trip Reduction Marketing

This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that a traveler could choose to read at their own leisure. For the purposes of the analysis, it is assumed that every employee would be eligible for passive marketing and promotional materials. A minimum of one marketing tool must be provided to all employees within one year of commencing business operation. A copy of the marketing tool must be provided to the Director of Environmental Services before issuance of a Certificate of Occupancy by the Building Official.

T-8: Provide Ridesharing Program

This strategy involves the use of ride-sharing matching services, designated preferred parking for ride-share participants, adequate passenger loading/unloading and waiting areas for ride-share vehicles, and a website or message board to connect riders and coordinate rides in order to increase vehicle occupancy. For the purposes of the analysis, it is assumed that every employee would be eligible for the ride-share program. The Permittee must provide details of the proposed rideshare program that is acceptable to the Director of

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Environmental Services before they issue a Certificate of Occupancy by the Building Official.

T-10: Provide End of Trip Bicycle Facilities

This strategy involves the installation and maintenance of end-of-trip facilities for the employee’s use, which includes bicycle parking, bike lockers, showers, and personal lockers. The number of bicycle parking spaces provided must be a minimum of one (1) space over and above what is required by the California Green Building Standard Building Code (CGSBC). Bike lockers, showers, and personal lockers must be proportional to the number of bike spaces provided, inclusive of all gender identities, and regularly maintained. The Permittee must provide details of the proposed parking spaces and facilities on the final site plan and floor plan before the Environmental Services Director issues a Zoning Clearance.

**TR-2 Ventura County Vehicle Miles Traveled Adaptive Mitigation Program (VMT AMP) Fair Share Cost Fee.** The Permittee must participate in the VMT AMP and pay a fair share cost of the transportation fee of \$1,650.00 per employee before the Environmental Services Director issues a Zoning Clearance. This fee is payable to the City of Simi Valley and is calculated based on the fair share cost transportation fee per VMT AMP multiplied by the approved employee count at the time of payment, as determined by the Director of Public Works. Before Environmental Services Director issues a Zoning Clearance, the Permittee must submit documentation to the Environmental Services Director confirming the number of employees hired at the project site. Throughout the duration of the Conditional Use Permit, if more employees are hired than initially approved, the Permittee must provide updated documentation to the Environmental Services Director and pay an additional Fair Share Cost Fee based on the VMT AMP fees at the time of the request.

- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

All Project activities, including loading and operation of off-road equipment (e.g., forklifts) would occur entirely onsite and no incompatible uses would be introduced to the public rights-of-way. The Project would construct new vehicular access in the form of two, two-way driveways along W. Los Angeles Avenue. In addition, back-in loading areas would be provided on both sides of the proposed building (4 dock-high roll-up doors on each side). SVMC Sections 9-34.090 and Section 9-34.100 contain design requirements for access driveways and standards for loading zones, respectively. The design of Project driveways, loading zones, and internal circulation improvements must comply with the requirements and standards for width, grade, angle, surface, clearance, turning radius, and lines of sight, etc. established in the SVMC. Compliance with these requirements and standards would be ensured through the City’s standard development review process. Project plans would be reviewed and approved by the Department of Public Works’ Principal Traffic Engineer. Any required revisions would be incorporated into Project design before the issuance of building permits by the Building Official.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Through compliance with development review conducted as part of the normal project permitting process, the Project would not substantially increase hazards due to a geometric design feature. Impacts would be less than significant.

- d) Result in inadequate emergency access?

During construction, it is expected that Project construction activities and staging areas would remain entirely onsite and would not require temporary street and/or lane closure(s) on W. Los Angeles Avenue. With regards to operation, the Project would not cause permanent alterations to offsite vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. The Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site.

Emergency vehicle access to the Project Site would continue to be provided directly from W. Los Angeles Avenue as needed and appropriate. Onsite circulation improvements (driveways and internal drive aisles) would be designed in accordance with all applicable design standards set forth by the City, which were established to ensure safe and efficient vehicular circulation and emergency access. Internal circulation would comply with City and VCFD width, clearance, and turning-radius requirements for fire apparatus access (Ventura County Fire Protection District Ordinance Number 29) (REF#28). Compliance with design standards and access requirements would be ensured through the City's standard development review process. Project plans would be reviewed and approved by the Department of Public Works' Principal Traffic Engineer, as applicable, and would be required to comply with the Ventura County Fire Protection District Conditions of Approval, which establish adequate turning radius and vertical clearance requirements for access roads and driveways. Any required revisions would be incorporated into Project design before the issuance of building permits by the Building Official.

Through compliance with development review conducted as part of the normal project permitting process, the Project would not result in inadequate emergency access. Therefore, impacts would be less than significant.

### XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or 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:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- b) 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 Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency must consider the significance of the resource to a California Native American tribe



Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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(a-b) A cultural resources records search was performed for the project, which identified one previously recorded prehistoric resource within the project site and six other cultural resources within a 0.5-mile radius of the site, however, none were recorded within the project site. Refer to Section V- Cultural Resources. To comply with Assembly Bill 52 (AB52), the City invited local interested tribes to consult on the project. The Fernandeano Tatavium Tribe of Mission Indians (FTBMI) requested consultation, from which the tribe found the project area to be sensitive for Tribal Cultural Resources, and expressed concern that previously unidentified Tribal Cultural Resources may be inadvertently impacted by proposed ground disturbing activities. Therefore the Permittee has incorporated the following mitigation measures **TCR1- 3** recommended by the FTBMI into the project:

**TCR-1 Tribal Monitor.** The Permittee must retain a professional Tribal Monitor procured by the Fernandeano Tatavium Band of Mission Indians (FTBMI) to observe the trenching for installation of an 18" HDPE Onsite Storm Drain. If Tribal Cultural Resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of the discovery and the Permittee must retain a qualified archaeologist meeting Secretary of Interior standards to assess the find. Work on the portions of the Projects outside of the buffered area may continue during this assessment period.

Should the find be deemed significant, as defined by Assembly Bill 52, Codified in Public Resources Code Section 21080.3.1 (REF #29), the Permittee must retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work.

**TCR-2 Consultation.** The Lead Agency and/or Permittee must, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

**TCR-3 Human Remains.** If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) must cease and the County Coroner must be contacted pursuant to California Health and Safety Code §7050.5 and that code must be enforced for the duration of the Project.

Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code § 7050.5, and the subsequent disposition of those discoveries must be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), if the remains or funerary object(s) are determined to be Native American in origin. The NAHC will determine and notify a MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the Permittee must reinter the remains in an area of the property secure from subsequent disturbance.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Therefore, with incorporation of the above mitigation measures, there is a less than significant impact to the environment from a substantial adverse change in the significance of a tribal cultural resource.

XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:

- a) 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?

The Public Works Department has reviewed the project and determined that no new or expanded infrastructure is required for water, wastewater treatment, or stormwater drainage. Therefore, there is a less than significant impact on the environment from the Project requiring or resulting in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage facilities. Electricity would be provided to the project site by Southern California Edison, and natural gas would be provided by SoCal Gas. Telecommunications are generally available in the project area, and facility upgrades would not likely be necessary. Therefore, there is a less than significant impact on the environment from the project requiring or resulting in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities.

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The project will construct a 66,431 square foot warehouse on a 7.67-acre site. The maximum water demand for this size and type of development, as provided in the Waterworks District Standards, is 46,305 gallons per day. The project would have a total project water demand of 16,901,443 gallons per year (52 acre-feet per year). The project site is served by Ventura County Waterworks District No. 8, a member water purveyor of the Calleguas Municipal Water Agency (a member agency of the Metropolitan Water District of Southern California). The current annual water supply contract between the Waterworks District and provided by Calleguas provides for a current based on the annual base demand (i.e., supply) of is 12,853 acre-feet. However, the highest annual use during the preceding 10-year period is 23,218 acre-feet. This amount is subject to increase on demand, ultimately to the contract limit of 132,535.8 acre-feet annually. The actual annual increase/decrease in total water delivery over the past 10-year period has fluctuated over the past 10 years due to water conservation reduction goals implemented by State legislation and drought restrictions but has averaged approximately five percent (525 acre-feet).; however, Calleguas indicated that it will meet the City's unconstrained demands for the forthcoming years. Demand for this project being less than one percent of. Therefore, the water supply is adequate for project demands, and there is no potential for a significant impact to the environment.

- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Currently, the City's Wastewater Treatment Plant handles approximately 8.0 million gallons of sewage per day (mgd). The facility's capacity is 12.5 mgd. The wastewater

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collection system and the City's water delivery system have not reached capacity. The City's Department of Public Works has reviewed the proposal and determined that no additional water or wastewater treatment facilities are required. Based on this information the Project would not generate sewage that exceeds the limits of the City's Wastewater Treatment Plant. Therefore, there is no potential for a significant impact to the environment from inadequate capacity of the wastewater treatment provider.

- d) 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?
 

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?
 

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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(d-e) The Simi Valley Landfill and Recycling Center (SVLRC) would serve the proposed Project. Solid waste from the proposed Project would be transported to the Simi Valley Landfill and Recycling Center operated by Waste Management at 2801 Madera Road, Simi Valley CA, approximately 3.0 miles east of the Project site. The SVLRC has a capacity of 123.1 million cubic yards of waste. Based on the maximum permitted disposal rate of 6,000 tons per day, seven days per week, 358 days per year, the site could operate until 2051 (REF #27). Waste Management accepts waste from a variety of sources; however, they are restricted to the approval rate of 6,000 tons per day. Therefore, there is no potential for a significant impact to the environment from an insufficient permitted capacity to accommodate the Project's solid waste disposal needs.

XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
 

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Emergency vehicles can access the site via two driveways from West Los Angeles Avenue. The property is also included in the City's emergency response and evacuation plan. Development of the property has been anticipated by these plans and there is no need to amend the existing procedures. Therefore, impacts would be less than significant and would not substantially impair the adopted emergency response plan or emergency evacuation plan.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
 

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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(b-c) The Project site is identified is within a High Wildfire Hazard Area, as shown in the Potential Wildlife Hazard Area Map in the City of Simi Valley General Plan (REF #18) and within a Local Responsibility Are (LRA) Very High Fire Severity Zone as mapped by the State Fire Marshal (REF #19). The Ventura County Fire Department has reviewed the plans and found that the project will meet all requirements for building sprinklers, fire

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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hydrants and fire flow, and the hazardous fire area building code established by Ventura County Fire Protection District ordinance. The infrastructure installation/expansion associated with the proposed project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, the project will have less than significant impacts that would exacerbate wildfire risks or require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As previously stated, the findings of the updated engineering geologic study (REF #20-21) show that the geologic units (i.e. earth materials) underlying the Project site consist of bedrock and alluvium. The geotechnical site evaluation of the property evaluated the suitability of the site soils for construction of the Project as proposed. The report states that construction of the Project is feasible from a geotechnical engineering standpoint provided that the recommendations presented in the report are followed and implemented. Based on the updated engineering geologic study, the subject property is located south of a small landslide deposit. To mitigate this, the landslide and adjacent slope would be completely removed by the Project's proposed grading. Project grading plans would be reviewed and approved by the Building Official as part of the normal grading permit process. In addition, the geologic conditions of the Site during construction would be confirmed by the geotechnical consultant as part of the monthly in-grading reports and as-built grading/compaction report, which would be prepared pursuant to the City's Guidelines for Geotechnical Reports. Therefore, there is no potential for a significant impact on the environment from landslides as a result of the project. Moreover, the Project site is located outside the dam inundation area for Las Lajas Dam, Bard Reservoir, Sycamore Canyon Dam, and Sinaloa Lake Dam. Therefore, there is no potential impact to the Project from flooding as a result of dam failure. The project will also be required to comply with Ventura County Fire Protection District Form #126 standards before obtaining any building permit for the new structure. Therefore, there is no potential for a significant impact to expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The Biological Resources Assessment and Jurisdictional Delineation conducted by Psomas (REF#7) for the Project Site involved general plant and wildlife surveys, as well as focused surveys for California Gnatcatcher (REF#8) and Crotch's Bumble Bee (REF#9). The general survey did not observe any sensitive natural communities, special status plant

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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species, or special state wildlife species onsite. Although no coastal California Gnatcatchers or Crotch's Bumble Bees were observed during the focused surveys, suitable habitat for these species exists onsite and offsite in the vicinity. Therefore, mitigation measures **BIO-1 through BIO-6** have been imposed on the Project, requiring pre-construction surveys for Crotch's Bumble Bee and nesting birds, including coastal California Gnatcatcher, as well as avoidance and protection if these species are found onsite. Implementation of these measures would reduce the Project's potential to result in substantial adverse effects on any candidate, sensitive, or special status wildlife species identified.

The Biological Assessment and Jurisdictional Delineation identified two jurisdictional drainage features (Drainage A and Drainage B). There is no proposed development or disturbance within their jurisdictional limits. Additionally, the Project would be setback a minimum of 100 feet from Drainage A and 140 feet from Drainage B, meeting Ventura County's Initial Study Biological Assessment (ISBA) requirements. The Project would also adhere to erosion and sedimentation control requirements during construction and operation to avoid substantial adverse effects on riparian habitat or other sensitive natural communities, as well as state or federally protected wetlands.

The Project is not located within the boundaries of any Habitat Conservation Plans, Natural Community Conservation Plans, or any other approved local, regional, or state habitat conservation plans. Therefore, it would not conflict with the provisions of any adopted habitat conservation plan. However, the Permittee will comply with mitigation measure **AES-1** to ensure that all site lighting will be equipped with recessed lenses and full cut off shields, and mounted to face away from all natural areas. At the western property line, light fixtures on poles will not exceed 14 feet in height to avoid directing lighting into the adjacent natural areas to the west of the project site.

A search for cultural resources was conducted for the project, revealing one prehistoric resource within the site and six others nearby. After various investigations, no significant impact on cultural resources was found. The Permittee has agreed to comply with Mitigation Measure **CUL-1** to mitigate any impacts encountered during construction. Therefore, with these measures, there is a less-than-significant impact on the environment regarding historical or archaeological resources and human remains.

To comply with Assembly Bill 52 (AB52), the City invited local interested tribes to consult on the project. The Fernandeano Tatavium Tribe of Mission Indians (FTBMI) requested consultation, from which the tribe found the project area to be sensitive for Tribal Cultural Resources, and expressed concern that previously unidentified Tribal Cultural Resources may be inadvertently impacted by proposed ground disturbing activities. Therefore the Permittee has incorporated mitigation measures **TCR-1 through TCR-3** recommended by the FTBMI into the project.

The Project Site is located within an area of High Paleontological Sensitivity (REF#22). In addition, the Project Site is undeveloped; therefore, grading and excavation would extend into subsurface materials that have not been previously disturbed. As such, construction activities have the potential to destroy paleontological resources in the event of their accidental discovery. Mitigation measures **GEO-1 through GEO-3** require the retention of a qualified Project Paleontologist and paleontological monitor, preparation of a Paleontological Resources Impact Mitigation Plan (PRIMP) outlining procedures for worker's training, paleontological monitoring, and fossil protection and curation in the event of their discovery.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Therefore, with mitigation, the project will not have a significant impact on the environment from degradation of the quality of the environment, substantial reduction of habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, reduction in the number or restriction of the range of an endangered, rare, or threatened species or elimination of important examples of the major periods of California history or prehistory.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

The Ventura County Air Pollution Control District Air Quality Management Plan (AQMP) states that if a project aligns with the AQMP, it would have a negligible cumulative impact on air quality. Therefore, the project has a minimal cumulative impact on air quality.

A Vehicle Miles Traveled (VMT) analysis was conducted for the project, revealing that the peak modeled VMT for the Project was 13.1 VMT per employee for work-based trips, which exceeds the City’s threshold of 5 percent below background VMT of 10.35 VMT/employee for work-based trips and is considered a significant impact (REF#26). To address this, mitigation measure **TR-1** is included in the Project, requiring the implementation of transportation demand management (TDM) strategies to reduce VMT through commute trip reductions marketing, provision of a ridesharing program, and provision of end-of-trip bicycle facilities. Implementation of mitigation measures **TR-1 through TR-2** would reduce VMT by 15.57 percent, resulting in a VMT per employee of 11.34 VMT, which still exceeds the City significance threshold of 10.35 VMT per employee. The Permittee has agreed to participate in the Ventura County Vehicle Miles Traveled Adaptive Mitigation Program (VMT AMP) and pay a fair share cost of transportation fee of \$1,650.00 per employee payable to the City as determined by the Director of Public Works before Environmental Services Director issues a Zoning Clearance. With the implementation of mitigation measures **TR-1 and TR-2**, impacts related to transportation would be less than significant.

Every project, including this development, must comply with the Countywide National Pollution Distribution Elimination System Permit (NPDES). This involves submitting stormwater drainage designs that comply with the Ventura Countywide Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) and calculating the Stormwater Quality Design Flow and Stormwater Quality Design Volume to determine the total amount and flow volume of water the design is required to clean. Compliance with these requirements ensures that each project filters the necessary amount of stormwater contributed to the public drainage system and that countywide pollutant concentrations comply with the NPDES permit. Therefore, there is a minimal cumulative impact on the environment from water pollution.

Since the project is consistent with the Air Quality Management Plan, the National Pollution Distribution Elimination Permit, and the impacts related to transportation would be less than significant with mitigation, there is a less than significant impact to the environment from impacts that are individually limited, but cumulatively considerable.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Significant impacts to air quality and hydrology, and significant impacts from hazardous materials, geologic conditions, and noise have the potential to cause substantial adverse effects on human beings. As mentioned previously, the project would not have a significant impact due to pollution, consistency with the Air Quality Management Plan, exposure of sensitive receptors to significant pollution concentrations, or odors. Also, with incorporation of mitigation measures, the project would not have a significant impact due to erosion, flooding, and polluted runoff. The project would not have a significant impact due to the use or transport of hazardous materials, accidental release of hazardous materials, release of hazardous materials within a quarter mile of a school, or development on a hazardous materials site. The project would not have a significant impact due to surface rupture, seismic ground failure, or landslides. The project would not have a significant impact on the environment due to the exposure of persons to noise levels in excess of standards established in the General Plan, the increase of ambient noise by 10 dB(A), or a substantial temporary or periodic increase in ambient noise levels. Therefore, there is no potential for a significant impact to the environment from effects which will cause direct or indirect substantial adverse effects on human beings.

## XXII. REFERENCES:

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7. Ventura County Air Pollution Control District, email communication to Envicom Corporation regarding VCAPCD AQMP Consistency Population Forecasts, Aug 26, 2019.
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10. Psomas, Results of Focused Non-Breeding Season Presence/Absences Surveys for the Coastal California Gnatcatcher for the 7.7-Acre Simi Valley Project, Ventura County, California, December 20, 2022.
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XXIII. LIST BELOW THE PERSON OR PERSONS WHO PREPARED OR PARTICIPATED IN THE PREPARATION OF THE INITIAL STUDY.

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