CITY OF SIMI VALLEY

Home of The Ronald Reagan Presidential Library

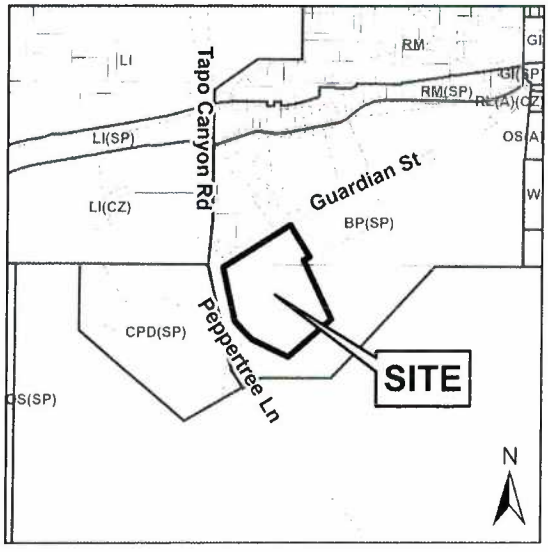
NOTICE OF PUBLIC HEARING
BY THE PLANNING COMMISSION OF THE CITY OF SIMI VALLEY TO CONSIDER A CONDITIONAL USE PERMIT (CUP-S-2023-0013) TO DEMOLISH AN EXISTING OFFICE BUILDING AND CONSTRUCT A 179,490-SQUARE-FOOT WAREHOUSE BUILDING LOCATED AT 4100 GUARDIAN STREET; AND NOTIFICATION OF THE RELEASE FOR PUBLIC REVIEW OF, AND INTENT TO ADOPT, A MITIGATED NEGATIVE DECLARATION FOR THE SUBJECT APPLICATION

NOTICE IS HEREBY GIVEN that a Public Hearing will be held by the Planning Commission of the City of Simi Valley to consider the application of Dunn Simi, LP for Conditional Use Permit (CUP-S-2023-0013), 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 consists of demolishing an existing office building and constructing a 179,490-square-foot warehouse building located at 4100 Guardian Street.

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 17, 2024 through August 6, 2024. The MND and Initial Study are available for public review at 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

Zarui Chaparyan, Associate Planner
Zchaparyan@simivalley.org
(805) 583-6774
Department of Environmental Services

CITY OF SIMI VALLEY

Home of The Ronald Reagan Presidential Library

REVIEW PERIOD:	July 17, 2024 – August 6, 2024
TO:	All Interested Parties
FROM:	Department of Environmental Services
SUBJECT:	REQUEST FO REVIEW OF THE INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR A CONDITIONAL USE PERMIT (CUP-S-2023-0013) TO DEMOLISH AN EXISTING OFFICE BUILDING AND CONSTRUCT A 179,490-SQUARE-FOOT WAREHOUSE BUILDING LOCATED AT 4100 GUARDIAN STREET

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:

Zarui Chaparyan
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, California 93063
(805) 583-6774
Zchaparyan@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 #2
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
Resources Mgmt. Agency
D. Ward
Watershed Protection District
Fire Protection District
Other Government Agencies
State Clearinghouse
Ventura County Air Pollution Control District
Ventura County Watershed Protection 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 Commission
Fernandeño Tataviam Band of Mission Indians
Mountains Recreation and Conservation Authority
Golden State Water Company

Applicant: Mike Dunn
Dunn Simi, LP
12000 Wilshire Boulevard, Suite 208
Los Angeles, CA 90017
(213) 580-1400
mikedunn@dunnpropertygroup.com

Contact: Matthew Herrill
JM Partners Development LLC
2256 Harwood Street
Los Angeles, CA 0031
(626) 226-4861
mherrill@gmail.com

CITY OF SIMI VALLEY

MITIGATED NEGATIVE DECLARATION

(NO SIGNIFICANT IMPACT ON THE ENVIRONMENT)

REVIEW PERIOD:	July 17, 2024 – August 6, 2024
APPLICANT (PERMITTEE):	Mike Dunn Dunn Simi, LP 12000 Wilshire Boulevard, Suite 208 Los Angeles, CA 90017
CASE PLANNER:	Zarui Chaparyan, Associate Planner
ENVIRONMENTAL PLANNER:	Zarui Chaparyan, Associate Planner
PROJECT NO.:	CUP-S-2023-0013
PROJECT DESCRIPTION:	Conditional Use Permit (CUP-S-2023-0013) to demolish an existing 135,520-SF office building and construct a 179,490-SF warehouse facility with retaining walls, parking lot, and landscaping at 4100 Guardian Street, Simi Valley.
PROJECT LOCATION:	4100 Guardian Street

On the basis of the Initial Study for the project, it has been determined that the project would not have a potentially 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 Pre-construction Nesting Bird Survey and Avoidance.

- Ground-disturbing activities and vegetation removal (including tree trimming) may only Ground-disturbing activities and vegetation removal (including tree trimming) may only occur outside the bird nesting season (September 1-January 31).
- If ground-disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (February 1-August 31), a pre-construction survey for nesting birds must be conducted by a qualified avian biologist with prior experience conducting nest bird surveys for construction projects. A qualified biologist must meet the minimum qualifications for Biological Consultants as listed below:
    - Must have an undergraduate or graduate degree with coursework in biology, botany, wildlife biology, natural resources, ecology, conservation biology, or environmental biology;
    - Have an up-to-date subscription to and experience using the California Natural Diversity Database/BIOS;
    - 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
    - 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.
- The study area includes the Project site and a 100-foot buffer around the Project site. If no active nests are found, no additional measures are required.
- If active nests are found, the avian biologist must map the location and document the species and nesting stage. The qualified avian biologist must implement an avoidance buffer area appropriate to the species. The avian biologist may change the avoidance buffer if field observations of bird behavior and biology to ensure the nest is unaffected

by Project activities, avoiding a risk of nest failure. The nest site would be fenced and/or flagged in all directions, and this area may not be disturbed until the nest becomes inactive.

I-2 **Cultural Resources WEAP Training.** Before construction, the Permittee must contract with a qualified archaeologist and local Native American monitor to develop Worker Environmental Awareness Program (WEAP) for all personnel involved in Project construction, including field consultants and construction workers. The one-time WEAP training session must be conducted before any Project-related construction activities in the Project site. The WEAP will include relevant information regarding the archaeological sensitivity of the area, including applicable regulations, protocols for unanticipated discoveries, and consequences of violating state laws and regulations. The WEAP will also describe appropriate avoidance and impact minimization measures for cultural resources and tribal cultural resources that could be located at the Project site and will outline further steps needed and who to contact if any potential cultural resources or tribal cultural resources are encountered. The WEAP will emphasize the requirement for confidentiality.

The Permittee must submit the WEAP to the City of Simi Valley (City) for review and approval before implementation. All workers, contractors, and visitors must attend the WEAP before entering the Project site and performing any work. The Permittee must provide copies of the training attendance sheets monthly to City staff as a record of compliance with this measure.

I-3 **Archeological and Native American Monitoring.** Prior to the commencement of construction, the Permittee will secure the services of a Native American Monitor from the Fernandeño Tataviam Band of Mission Indians and a qualified archaeological monitor to observe all ground-disturbing activity (i.e clearing, grubbing, grading, trenching, etc.) on a full-time basis. A copy of the contracts or monitoring agreements will be sent to the City of Simi Valley for their review and approval.

I-4 **Unanticipated Discovery of Cultural Resources.** If archaeological resources are encountered during ground disturbing activity on the site, all activity within a 100-foot radius of the find must be stopped, the City of Simi Valley must be notified, and a qualified archaeologist and Fernandeño Tataviam Band of Mission Indians Native American monitor must examine the find. The archaeological and Native American monitors must evaluate the find to determine if it meets the definition of a historical, unique archaeological, or tribal cultural resource and make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits for any construction occurring within the above-referenced 100-foot radius. The City of Simi Valley will consult in good faith with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any tribal cultural resource encountered. If the find(s) do not meet the definition of a historical, unique archaeological, or tribal cultural resource, no further study or protection is necessary prior to project implementation. If the find does meet the definition of a historical, unique archaeological, or tribal cultural resource, then it will be avoided by project activities. If avoidance is not feasible, adverse effects to such resources will be mitigated in accordance with the recommendations of the archaeological and Native American monitor. Recommendations may include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery must be submitted to the City of Simi Valley, Native American Heritage Commission (tribal cultural resources), and the South Central Coastal Information Center.

The Permittee will ensure that construction personnel do not collect or move any cultural material and will ensure that any fill soils that may be used for construction purposes does not contain any archaeological materials.

I-5 **Unanticipated Discovery of Human Remains.** If human remains are discovered during excavation or grading of the site, all activity within a 100-foot radius of the find will be stopped. The Ventura County Coroner must be notified immediately and will determine whether the remains are of Native American origin or an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of the identification. Once the NAHC identifies the most likely descendant(s) (MLD), the descendant(s) will make recommendations regarding proper burial (including the treatment of grave goods), which will be implemented in accordance with section 15064.5(e) of the California Code of Regulations, Title 14. The archaeologist will recover scientifically valuable information, as appropriate and in accordance with the recommendations of the MLD. A report of findings documenting any data recovery must be submitted to the City of Simi Valley, the South Central Coastal Information Center, and the MLD.

I-6 **Drainage and Landscaping Maintenance.** The construction contractor must adhere to the following maintenance protocols for construction on expansive soils on the Project site:

- Positive drainage should be continually provided and maintained away from structures and should not be changed creating an adverse drainage condition. Plumbing leaks should be immediately repaired so the subgrade soils underlying the structure do not become saturated.
- Initial landscaping must be undertaken in unpaved areas adjacent to structures. Trees and shrubbery must not be planted where roots can grow under foundations and hardscape when they mature.
- Landscaped areas must be maintained in a uniformly moist condition and not allowed to dry out.

I-7 **Paleontological Resource Monitoring and Mitigation Plan.** Before the start of any Project-related construction activities, the Permittee must retain a State-approved paleontologist (Project Paleontologist) to prepare and implement a project-specific Paleontological Resource Monitoring and Mitigation Plan (PRMMP), which must be approved by the City of Simi Valley Environmental Services Director. The Project Paleontologist is responsible for implementing all the paleontological conditions of approval and for using qualified paleontologists to assist in work and field monitoring. 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 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;

- 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;
- Proficiency in recognizing fossils in the field and determining their significance;
- Expertise in local geology, stratigraphy, and biostratigraphy; and
- Experience collecting vertebrate fossils in the field.

At a minimum, information to be contained in the PRMMP, in addition to other information required under the guidelines of the Society of Vertebrate Paleontology (SVP), is as follows:

- Description of the Project site and planned earthwork and excavation, and a map identifying locations where excavations and ground disturbing activities will or will be likely to encounter paleontological resources.
- The museum or repository that has agreed to accept the recovered fossils must be identified in the PRMMP.
- The PRMMP must detail methods of monitoring, recovery, preparation, and analysis of specimens, data analysis, reporting, and the final curation location of specimens at an identified repository.
- Identification of personnel with authority and responsibility to temporarily halt or divert ground disturbance activities to allow for recovery of significant specimens.
- The PRMMP must be submitted to the City of Simi Valley Environmental Services Director for review and approval 60 days before the start of Project construction.

I-8 **Paleontological Resources WEAP Training.** Prior to the start of Project-related construction activities, a WEAP must be developed by the Project Paleontologist. The WEAP must address the potential to encounter paleontological resources in the field, the sensitivity and importance of these resources, and the legal obligations to preserve and protect such resources. The training program must also include the set of reporting procedures that workers are to follow if paleontological resources are encountered during Project activities. The WEAP may be combined with other environmental training programs for the Project. All field personnel will receive WEAP training on paleontological resources prior to Project-related construction activities.

I-9 **Paleontological Monitoring and Fossil Recovery.** Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. If the Project Paleontologist determines full-time monitoring is no longer warranted, based on the geologic conditions at depth, he or she may recommend to the City of Simi Valley (City) that monitoring be reduced or cease entirely.

- If fossils are discovered, the Project Paleontologist must temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. The Paleontological Monitor, and/or Project Paleontologist must evaluate the discovery and determine if the fossil may be considered significant, and if significant, recover the fossil.
- Upon completion of Project ground disturbing activities, all significant fossils collected would 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 fossil specimens must be identified to the lowest taxonomic level practical prior to curation at an accredited museum. The fossil specimens must be delivered to the approved

repository (identified in the Paleontological Resource Mitigation Plan) and receipt(s) of collections submitted sent to City no later than 60 days after all ground disturbing activities are completed.

I-10 **Paleontological Resources Monitoring Report.** The Permittee must prepare a paleontological resource mitigation and monitoring report by the Project Paleontologist following completion of ground disturbing activities. The contents of the report must include, but not be limited to a description and inventory list of recovered fossil materials (if any); a map showing the location of paleontological resources found in the field; determinations of scientific significance; proof of accession of fossil materials into the pre-approved museum or other repository; and a statement by the Project Paleontologist that Project impacts to paleontological resources have been mitigated.

RESPONSIBLE AGENCIES: City of Simi Valley

TRUSTEE AGENCIES: None

Zarui Chaparyan

Zarui Chaparyan, Associate Planner

DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

4100 Guardian Street Warehouse

Prepared for

City of Simi Valley

Submitted by

Aspen environmental group

July 2024

CONTENTS

TABLES

FIGURES

APPENDICES

1. 4100 GUARDIAN STREET WAREHOUSE MITIGATED NEGATIVE DECLARATION

1.1. Introduction

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to inform responsible and trustee agencies, public agencies, and the public that the City of Simi Valley (City), as the Lead Agency under the California Environmental Quality Act (CEQA), prepared an analysis for the proposed 4100 Guardian Street Warehouse (proposed Project or Project). As Lead Agency, the City is responsible for approving the (MND) and if appropriate, approving or denying the proposed Project.

This document was prepared in accordance with CEQA, (Public Resources Code [PRC] §21000, et seq.) and the CEQA Guidelines (14 Cal. Code Regs. §15000, et seq.). Specifically, this document meets the requirements of CEQA Guidelines § 15000 and § 15071, and the environmental checklist (Chapter 3) meets the requirements of CEQA Guidelines § 15063. An IS is prepared by a lead agency to determine if a project may have significant effects on the environment (CEQA Guidelines § 15063[a]), and to determine the appropriate environmental document. In accordance with CEQA Guidelines § 15070, "A public agency shall prepare…a proposed negative declaration or mitigated negative declaration…when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment."

Based on the analysis in this IS, the City determined that all Project-related environmental impacts would be less than significant with mitigation, less than significant, or no impact would occur. Therefore, approval of an MND will satisfy the requirements of CEQA. The mitigation measures included in this MND are designed to reduce or eliminate the potentially significant environmental impacts described in the IS. Mitigation measures are structured in accordance with the criteria in CEQA Guidelines § 15370.

1.2. Public Review

In accordance with CEQA Guidelines, §15073, the lead agency must provide a public review period pursuant to CEQA Guidelines §15105 of at least 20 days. The notice of intent to adopt the proposed MND must include a copy of the proposed IS, and together, the IS/MND must be sent to the public, responsible agencies, trustee agencies, and the County Clerk of the county within which the proposed Project is located. Pursuant to CEQA Guidelines §15072, the lead agency must notify in writing any public agency that provides comments on the proposed IS/MND of public hearings for the Project.

1.3. Document Organization

The IS/MND is organized as follows:

Section 1. Introduction. This section introduces the document and discusses the CEQA process and public review process.

Section 2. Project Description. This section provides a brief Project overview, describes the Project location, setting, land use, and zoning, and provides a detailed description of the Project and anticipated permits and approvals.

Section 3. Environmental Checklist. This section provides an analysis of environmental impacts that would potentially occur as a result of the proposed Project. The list of applicable mitigation measures is provided in this section.

Section 4. Mitigation Monitoring and Reporting Program. This section identifies procedures for implementing mitigation measures to be adopted for the proposed Project.

Section 5. List of Preparers. This section identifies the report preparers.

Section 6. List of Acronyms and Abbreviations. This section lists common acronyms and abbreviations used throughout the document.

Section 7. References. This section lists the references corresponding with the in-text citations used in preparation of this IS/MND.

2. PROJECT DESCRIPTION

2.1. Project Overview

Dunn Simi, LP (Applicant or Permittee) proposes to construct the 4100 Guardian Street Warehouse (proposed Project), which would include the demolition of an existing 135,520-square-foot (SF) office building and construction of a 179,490-SF facility, of which 9,000 SF would be used for potential office space. This IS/MND was prepared to evaluate the reasonably foreseeable and potentially significant adverse environmental impacts associated with the proposed Project. This section discusses project information, such as the location, setting, Project components, construction, operation, as well as anticipated permits and approvals. The proposed Project would include demolition of the existing building, and construction of a warehouse building, office spaces, parking lot, and landscaping improvements. The proposed Project would provide a modern industrial building to be operated by a to-be-determined tenant. The approximate hours of construction and operation would be weekdays from 8:00 am to 5:00 pm.

2.2. Project Location and Setting

The proposed Project would be located at 4100 Guardian Street, which is along the southeastern edge of the City of Simi Valley at the southeast corner of the intersection of Tapo Canyon Road and Guardian Street (Figure 1). The Project site is bounded by Guardian Street to the north, Peppertree Lane to the west, open space and an office building to the east, and open space and institutional development to the south. Commercial office buildings are located to the north of Guardian Street and west of Tapo Canyon Road. Peppertree Lane begins at the intersection of Tapo Canyon Road and Guardian Street and runs north-south, connecting to the American Jewish University – Brandeis Bardin Campus, located approximately 200 feet to the south of the Project site. The Project site is approximately 1.2 miles south of California State Route (SR) 118 (Ronald Reagan Freeway).

The proposed Project would be located on approximately 10.3 acres spanning two parcels that currently consist of an existing 135,520-SF office park building, 172,879-SF paved parking lot, and a 205,001-SF of landscaping. The office building is currently occupied by several tenants but would be vacated by January 2025.

2.3. Land Use and Zoning

The Project site is within an area governed by the City of Simi Valley General Plan and the Brandeis-Bardin Institute Specific Area Plan.

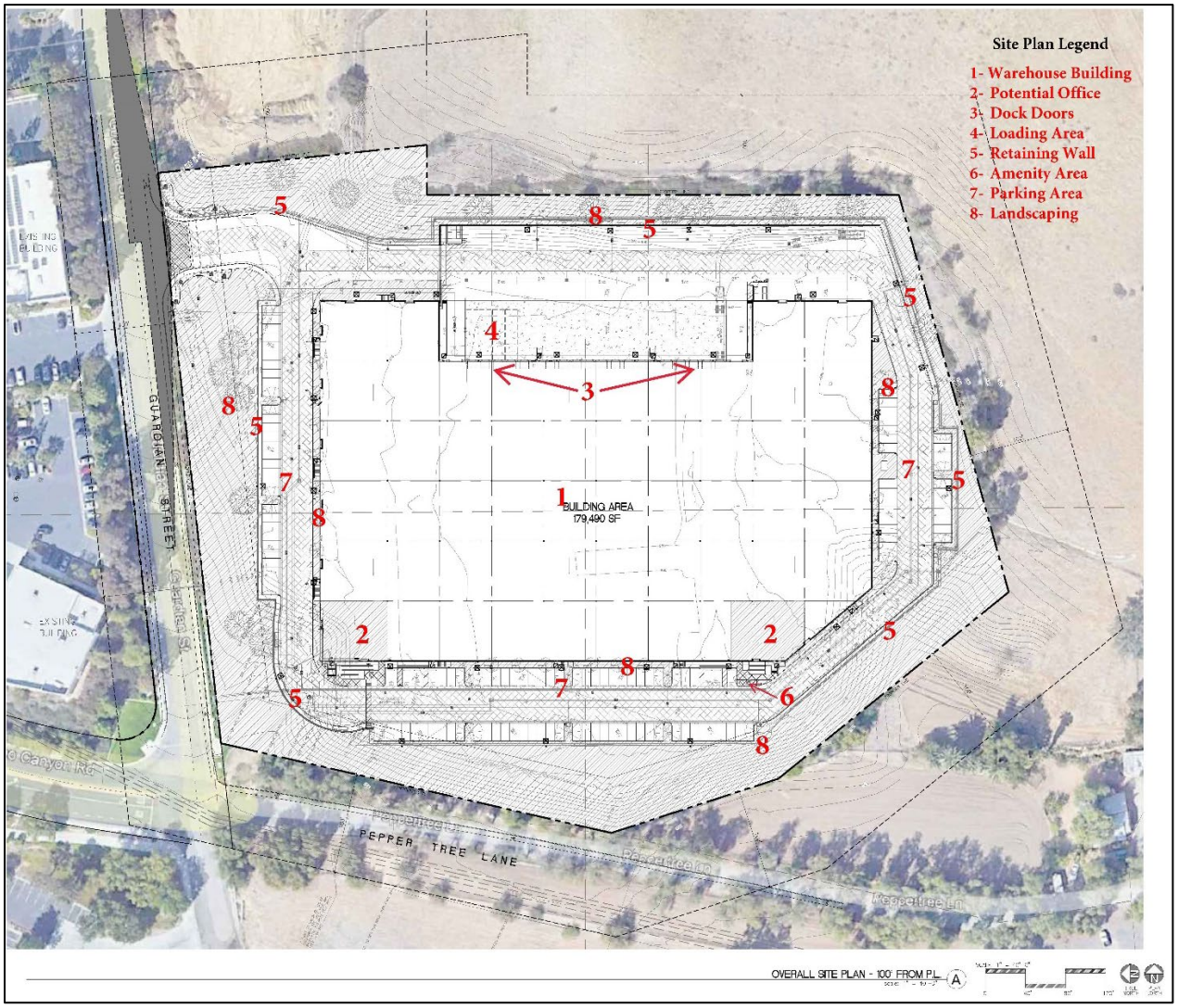
The proposed Project's General Plan land use designation is Business Park (City of Simi Valley, 2011; 2023). The Project spans two parcels, Assessor's Parcel Numbers (APNs) 626-0-052-065 and 626-0-052-095, and zoned Business Park (BP) under Title 9 of the Development Code of the City of Simi Valley Municipal Code (City of Simi Valley, 2011; 2024a).

Figure 1. Proposed Project Location

2.4. Project Details

The proposed Project includes demolition of the existing 135,520-SF office building, site preparation (excavation and grading), and construction of a 170,490-SF warehouse facility building, of which 9,000-SF would be for office spaces, parking lot, and landscaping improvements on an approximately 10.3-acre site. Each construction phase is discussed further below, and construction components are shown in Figure 2.

Figure 2. Site Plan



Demolition

The existing development consists of a 135,520-SF single office park building with a 172,879-SF paved area and 205,001 SF of landscaping. Everything within the 10.3-acre property line would be demolished, including the existing building, pavement, landscaping, and underground utility systems. 144 mature, non-native trees would be removed or transplanted as necessary to accommodate construction of the new warehouse building and parking lot. In compliance with Simi Valley Municipal Code (SVMC) § 9-38.040 and as recommended by the City's Certified Arborist consultant, some of the mature trees may be transplanted on-site, away from the development footprint or removed for resale and off-site transplant

(Innes, 2024). The Applicant would coordinate with a reputable tree moving company during these activities., Seven (7) oak trees on the property are proposed to be preserved in place, including the heritage oak tree.

Site Preparation

Site preparation would include activities such as excavation, grading, and fencing of protected trees per the Protected Tree Report (Tree Care Consulting, 2024, provided as Appendix C), connections to existing utilities, and installation of stormwater infrastructure. Grated inlets, gutters, storm drains, detention basin, and pretreatment devices would be installed to reduce pollution in runoff. Cut material would be approximately 26,800 cubic yards (CY) and fill material would be approximately 4,050 CY. Material to be exported would be approximately 22,750 CY.

Warehouse Building

The new building would be a total of 179,490 SF with a 170,490-SF warehouse building and 9,000 SF of office space with a maximum height of 36 feet. The warehouse building would include four restrooms.

The loading area and 18 dock doors would be located along the eastern portion of the building. Additionally, a retaining wall is proposed for truck loading docks along the base of the eastern and southern ascending slopes with new cuts into the existing slopes. 20-foot-high site lighting poles would be installed around the building perimeter, and exterior lights would surround the building. An outdoor break area is proposed adjacent to the southeast border of the building.

Parking Lot

As part of the proposed Project, 129,690 SF of permeable surface parking would be provided to the north, south, and west of the facility as well as a new driveway alignment along Guardian Street. A total of 129 parking stalls are proposed, including 99 standard parking stalls, five Americans with Disabilities Act (ADA) parking stalls, and 25 electric vehicle (EV) parking stalls as well as three bike racks.

Retaining Walls

The proposed Project would include construction of retaining walls surrounding the majority of the site boundary on the north, east, and south. Retaining walls may consist of a combination of soil nail walls, permanent caisson (pile) walls, and permanent conventional L-walls (DRS Engineering Inc, 2024).

Landscaping

Landscaping would be done within the new parking areas and driveways as well as along the proposed warehouse building. Landscaping would include a variety of trees, shrubs (40 percent of the landscape area), accent plants, and groundcover (60% of the landscape area) and total 138,923 SF. Three- to six-foot-high screen hedges would surround the electrical transformer on the eastern side of the Project site. Decorative paving would also be incorporated in these areas as part of the proposed landscaping improvements.

Irrigation for the new landscaping would be installed, including sprinklers using potable water. All landscaping improvements would comply with the requirements of the SVMC and State Model Water Efficient Landscape Ordinances as required by the California Green Building Standards Code (CCR Title 24, Part 11).

2.5. Project Construction

Construction phases include demolition, site preparation, building construction, and paving. Construction of the proposed Project is anticipated to occur over approximately 18 months, beginning in the first quarter of 2025 and concluding in the first quarter of 2026. An average of 30 construction workers would be on site, with a peak of up to 70 workers depending on the construction phase. Construction would occur Monday through Friday between 8:00 a.m. and 5:00 p.m. (one shift per day), consistent with the City of Simi Valley building construction work hours. Construction would not occur on weekends or federal holidays. Temporary nighttime lighting during construction would be required and confined to the Project site to provide site security. All utility connections required for the Project would be routed to existing utilities during construction.

Access to the Project site and staging areas would be provided by the driveway approach off Guardian Street to the northeast. Temporary partial lane closures on Guardian Street would be required during construction of the revised driveway approach. Construction staging of materials and equipment would be within the Project site. Cut material would be approximately 26,800 cubic yards (CY) and fill material would be approximately 4,050 CY. Material to be exported would be approximately 22,750 CY. Typical construction equipment would include the following:

- Backhoe
- Chainsaw
- Concrete saws
- Concrete mixing trucks
- Bulldozers
- Cranes
- Excavators
- Graders
- Tractors
- Grinders
- Pavers
- Rollers
- Mixers
- Water trucks
- Air compressors
- Generators
- Forklifts
- Welders

Project construction would comply with the Stormwater Pollution Prevention Plan (SWPPP) as required by the Construction General Permit in compliance with State Water Board Order WQ 2022-0057-DWQ. Construction would also comply with the Ventura Countywide Stormwater Quality management Program, which includes the Ventura County Storm Water Quality Urban Impact Mitigation Management Plan (SQUIMP), National Pollutant Discharge Elimination System (NPDES) Permit No. CAS004004, Order No. R4-2021-0105. The Project would comply with AB 341 (2011), AB 1826 (2014), and SB 1383 by ensuring all trash enclosure areas contain adequate space for multiple container types (e.g., municipal solid waste, solid waste recycling, and organic waste recycling). Additionally, the proposed Project would comply with the Statewide Model Water Efficient Landscape Ordinance and AB 1572 (2023) (Non-Functional Turf Ban) for commercial purposes). During Project construction activities, SWPPP best management practices (BMPs) for erosion and sediment control, as well as City of Simi Valley BMPs, would be implemented at the site.

2.6. Operations and Maintenance

Currently, operations and maintenance of the new warehouse is unknown, as no actual tenant has been identified. Specific building operations and maintenance and the type of products to be shipped and stored have not been determined. For analysis purposes, operations may involve up to 180 employees and up to 52 daily heavy-duty truck trips, but may vary depending on the ultimate tenant operations. The assumed hours of operation would be 8:00 a.m. to 5:00 p.m. on weekdays.

2.7. Anticipated Permits and Approvals

Table 1 presents the anticipated permits and approvals from regulatory agencies needed for the proposed Project:

Table 1. Anticipated Permits and Approvals Required for the Proposed Project

Agency	Jurisdiction	Requirements/Permits/Approvals
Local/Regional Agencies		
Ventura County Air Pollution Control District	Air quality standards and permits	Authority to Construct and Permit to Operate for stationary sources, such as backup generator
Ventura County Watershed Protection District	Jurisdiction over Meier Canyon Creek	Establishes standards for stormwater treatment and runoff
City of Simi Valley	New development projects Ventura Countywide Stormwater Quality Management Program	Planned Development Permit Landscape Documentation Package for compliance with State Model Water Efficient Landscape Ordinance Approval for design and implementation of post-construction stormwater management control measures. Grading Permits Building Permits

3. INITIAL STUDY ENVIRONMENTAL CHECKLIST

1. Project Title:	4100 Guardian Street Warehouse Project
2. Lead Agency Name and Address:	City of Simi Valley Environmental Services 2929 Tapo Canyon Road Simi Valley, California 93063
3. Contact Person and Phone Number:	Zarui Chaparyan, Associate Planner Environmental Services City of Simi Valley 2929 Tapo Canyon Road Simi Valley, California 93063
4. Project Location:	4100 Guardian Street, Simi Valley, CA 93063
5. Project Sponsor's Name and Address:	Dunn Simi, LP 1200 Wilshire Boulevard, Suite 208 Los Angeles, CA 90017
6. General Plan Designation:	Business Park
7. Zoning:	Business Park (BP)
8. Description of Project:	Dunn Simi, LP (Applicant) proposes to demolish an existing 135,520-SF office building and construct a 179,490-SF warehouse facility with retaining walls, parking lot, and landscaping at 4100 Guardian Street, Simi Valley.
9. Surrounding Land Uses/Setting	The Project site is on two parcels, APNs 626-0-052-065 and 626-0-052-095. The Project site is bounded by Guardian Street to the north, Peppertree Lane to the west, open space and an office building to the east, and open space and institutional development to the south. Commercial office buildings are located to the north of Guardian Street and west of Tapo Canyon Road. Peppertree Lane begins at the intersection of Tapo Canyon Road and Guardian Street and runs north-south, connecting to the American Jewish University – Brandeis Bardin Campus, approximately 200 feet south of the Project site.
10. Other Public Agencies Whose Approval is Required	Ventura County Air Pollution Control District, Ventura County Watershed Protection District, City of Simi Valley
11. Have California Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21808.3.1?	Yes (refer to Section 3.20, Tribal Cultural Resources)

3.1. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the proposed Project, requiring implementation of mitigation as indicated by the checklist and in Sections 3.3 through 3.23.

☐ Aesthetics	☐ Agriculture & Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

3.2. Environmental 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 Environmental Impact Report 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.

SCANNED SIGNATURE HERE

Zarui Chaparyan, Associate Planner
Department of Environmental Services
City of Simi Valley

Date

3.3. Aesthetics

AESTHETICS **Except as provided in Public Resources Code Section 21099, would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Have 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?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

3.3.1. Environmental Impacts

a. Would the project have a substantial adverse effect on a scenic vista?

LESS-THAN-SIGNIFICANT IMPACT. The Project site is surrounded by immediate views of commercial office buildings and ornamental trees and landscaping to the north, open space grasslands to the east, open space and low-density development to the south, and open space and landscaping to the west. Scenic vistas can be found along Tapo Canyon Road but are limited to the northern portion of the road and do not extend to the Project vicinity (City of Simi Valley, 2012a). Although construction equipment and materials may be visible from public vantage points, construction would be short-term, lasting approximately 18 months. Therefore, operational impacts to scenic vistas would be less than significant, and no mitigation is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

LESS-THAN-SIGNIFICANT IMPACT. According to the Ventura County General Plan's Resource Protection Map, no Scenic Resource Areas exist near the Project site (Ventura County, 2010). However, the City of Simi Valley General Plan Natural Resources Element identifies open space and tree-studded hillsides as visual resources (City of Simi Valley, 2021). The Project site is approximately 0.2 miles south of California State Route (SR) 118, an eligible State scenic highway but not an officially designated State scenic highway (Caltrans, 2018). The Project site is not visible from SR-118. Construction of the proposed Project would not damage or adversely affect rock outcroppings or historic buildings, as construction activities would occur within a previously developed property that does not include these resources. While open space and tree-studded hillsides are located south of the Project site, the Project would not include development within these visual resources nor would it block views of these areas. Therefore, the proposed Project would not obstruct views to or from a State scenic highway, and a less-than-significant impact on scenic resources within a State scenic highway would occur. No mitigation is required.

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

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would be located in an urbanized area adjacent to open space. The Project site is currently zoned Business Park and would not conflict with any applicable zoning and land use regulations governing scenic quality. The proposed Project would be compatible with the surrounding area, as it would look relatively similar to the existing development on site and adjacent buildings. This would be consistent with the Brandeis-Bardin Institute Specific Area Plan, which identifies development standards to preserve natural areas above twenty percent slope, protection of the Meier Creek Channel, and preservation of existing trees (City of Simi Valley, 2011). All proposed Project components would be consistent with the existing visual character of the area and would not contrast with neighboring development or impact a scenic vista. The proposed Project activities do not involve the construction of any large obtrusive structures that would be substantially different from the existing building and degrade the existing visual character or quality of the site or its surroundings. Therefore, impacts would be less than significant, and no mitigation is required.

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

LESS-THAN-SIGNIFICANT IMPACT. Although Project construction would occur during daylight hours between 8:00 a.m. and 5:00 p.m., temporary construction nighttime lighting would be required for security purposes. In addition, permanent lighting would be installed at the Project site for operation activities and security purposes. All lighting at the Project site would be directed toward the site and away from surrounding roadways, so that glare would not occur. Additionally, each exterior light fixture and light source would comply with the standards pursuant to SVMC § 9-30.040 (Exterior Light and Glare). Pursuant to SVMC § 8-21.16 (Special Non-Residential Building Provisions), the proposed Project would comply with lighting standards that require open parking lots and access thereto to include a maintained minimum of one foot-candle[1] of light or an energy efficient type on the parking surface from dusk until the close of business every operating day. The proposed warehouse building would not have large areas of reflective surfaces, such as glass or metal, and would not cause substantial adverse glare in the surroundings. Therefore, the proposed Project would have a less-than-significant impact related to light or glare, and no mitigation is required.

[1] Foot-candle is defined as a unit of measure of the intensity of light falling on a surface equal to one lumen per square foot (Municode, 2023).

3.4. Agriculture and Forestry Resources

AGRICULTURE AND FORESTRY RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) pre-pared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the 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 §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?	☐	☐	☐	☒
(d) Result in the loss of forest land or 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?	☐	☐	☐	☒

3.4.1. Environmental Impacts

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as Shown on the Maps Prepared Pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to Non-agricultural use?

NO IMPACT. The Department of Conservation (DOC) California Important Farmland Finder identifies the Project site as Urban and Built-Up Land, which is defined as land occupied by residential, industrial, commercial, institutional, or other similar structures with a building density of approximately six structures to a 10-acre parcel (DOC, 2022). Accordingly, the Project site is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance that would be converted to accommodate the proposed Project. Therefore, no impact on designated farmland would occur, and no mitigation is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

NO IMPACT. As discussed in Section 3.4.1(a), the proposed Project would be located on Urban and Built-Up Land (DOC, 2018). Because the Project site would not be located on designated agricultural land, it would not be located on land enrolled in a Williamson Act Contract. The Project site is zoned Business Park (BP), and there are no agricultural zoning designations or agricultural uses within the Project limits or adjacent areas (City of Simi Valley, 2011; 2023; 2024a). Therefore, there would be no impact on existing zoning for agricultural use or a Williamson Act Contract, and no mitigation is required.

c. Would the project 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))?

NO IMPACT. As discussed in Section 3.4.1(b), the Project site is zoned BP, and as a result, would not conflict with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. Therefore, there would be no impact on land zoned for forest land, and no mitigation is required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

NO IMPACT. The proposed Project would occur in an area that does not include forest land. Accordingly, the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, there would be no impact on forest land, and no mitigation is required.

e. Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

NO IMPACT. As discussed in Sections 3.4.1(a) and 3.4.1(b), no farmland exists within the Project site or the surrounding area. Accordingly, the proposed Project would not involve changes in the existing environment that could result in the conversion of farmland to non-agricultural use. Therefore, there would be no impact on agricultural land uses or activities, and no mitigation is required.

3.5. Air Quality

AIR QUALITY Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
(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?	☐	☐	☒	☐
(c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

3.5.1. Environmental Impacts

This section introduces general information on air quality and provides data on the existing air quality settings and detailed analysis on Project air quality impacts, provided in detail in the Air Quality Assessment for 4100 Guardian Street Warehouse Project, prepared by Kimley-Horn and Associates, Inc. in February 2024. This report is incorporated by reference and provided in Appendix A:

> Kimley-Horn. 2024a. Air Quality Assessment, 4100 Guardian Street Warehouse Project, City of Simi Valley, California. February.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

NO IMPACT. The United States Environmental Protection Agency (USEPA) requires each state with nonattainment areas to submit a State Implementation Plan that demonstrates the means to attain the federal standards and integrates federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas. The California Clean Air Act (CCAA) requires the development of air quality attainment plans for areas designated as nonattainment regarding the state and federal ambient air quality standards that outline emissions limits and control measures to meet these standards.

The proposed Project is located within the South Central Coast Air Basin (SCCAB) and under the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD). To reduce emissions of criteria pollutants for which the SCCAB is in nonattainment, the VCAPCD adopted the 2022 Air Quality Management Plan (AQMP) that establishes program of rules and regulations directed at this goal and achieving state and national air quality standards. The proposed Project is subject to the VCAPCD's AQMP.

Project consistency with the AQMP is determined by comparing the actual population growth in the County with the projected growth rates in the AQMP. However, if more recent population forecasts have been adopted by the Ventura Council of Governments (VCOG) where the County population is lower than that included in the AQMP, lead agencies may use the more recent VCOG forecasts for determining consistency (Kimley-Horn, 2024a).

The proposed Project consists of the redevelopment of a built-out site that would not result in a direct increase in population since the proposed buildings would not accommodate any new residents. Accordingly, the Project would not result in substantial unplanned growth or unaccounted for growth in the General Plan or growth projections used by the VCAPCD to develop the 2022 AQMP. Thus, no impact would occur, and mitigation is not required.

b. Would the project 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?

LESS-THAN-SIGNIFICANT IMPACT. Construction of the proposed Project would generate short-term emissions of criteria air pollutants, including ozone (O_3) precursor pollutants (i.e., Reactive Organic Gases [ROG] and Nitrogen Oxide [NO_X]) and Coarse Particulate Matter (PM_{10}) and Fine Particulate Matter ($PM_{2.5}$). Construction-generated emissions are short term and would occur only during the construction period. Accordingly, the VCAPCD's thresholds of significance for ROG and NOx are not intended to be counted towards construction emissions because construction emissions are temporary (Kimley-Horn, 2024a).

Construction would result in the temporary generation of emissions resulting during demolition, site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are primarily dependent on the amount of ground disturbance from site preparation activities as well as weather conditions and the appropriate application of water (Kimley-Horn, 2024a).

Construction is expected to occur over a period of a year to a year and a half. Emissions anticipated to be generated by construction activities were calculated using the California Air Resources Board (CARB)-approved CalEEMod computer program, which models emissions for land use development projects, based on typical construction requirements. Table 2 below summarizes the predicted maximum daily construction generated emissions for the Project.

Table 2. Construction-Related Emissions

Construction Year	Emissions (Maximum Pounds Per Day)					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Year 1	3.72	36.06	33.99	0.08	11.89	5.47
Year 2	14.80	19.55	29.02	0.04	2.22	1.08

Notes: Notes: VCAPCD Rule 55 Fugitive Dust applied. The Rule 55 reduction/credits include the following action to minimize fugitive dust: securing tarps over truckloads of soil material; watering exposed soil surfaces and bulk material stockpiles; limited speeds on unpaved roads. No mitigation was applied to construction equipment. Refer to Appendix A of Appendix A (Air Quality Assessment; Kimley-Horn, 2024a) for Model Data Outputs.
Source: CalEEMod version 2022. Refer to Appendix A of the Air Quality Assessment (Kimley-Horn, 2024a) for model outputs.

Fugitive dust emissions may have a substantial, temporary impact on local air quality and may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. The greatest emissions of fugitive dust would occur during the site preparation and grading which would require the use of earth-moving equipment. The proposed Project would be subject to VCAPCD Rules 51 and 55 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.) and 74.2 (architectural coatings) to minimize fugitive dust and limit volatile organic compound (VOC) content in specific coatings. As noted above, VCAPCD does not intend for the significance threshold of 25 pounds per day (lbs/day) for

ROG and NO_X to be applied to construction emissions since these emissions are temporary. Compliance with the applicable VCAPCD Rules would ensure that Project construction emissions would not result in a cumulatively considerable net increase of any criteria pollutant. Therefore, impacts related to temporary construction activities would be less than significant, and mitigation is not required (Kimley-Horn, 2024a).

Operational Emissions

Project-generated emissions would be primarily associated with motor vehicle traffic, and equipment to support warehouse operations, including forklifts and potentially a backup generator. Table 3, Operational Emissions shows the estimated maximum daily operational emissions for the proposed Project. These emission estimates conservatively assume no baseline activity occurs at the site, and all proposed Project operations could be considered net new emissions.

Table 3. Operational Emissions

Source Type	Emissions (Maximum lbs/Day)					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Mobile Sources	1.53	9.44	15.8	0.09	4.98	1.37
Area Sources	5.37	0.07	7.81	0	0.01	0.01
Energy Use	0.05	0.95	0.79	0.01	0.07	0.07
Off-Road Equipment	0.34	3.2	4.52	0.01	0.17	0.16
Stationary Sources	1.23	5.51	3.14	0.01	0.18	0.18
Total Emissions	8.52	19.17	32.06	0.12	5.41	1.79
VCAPCD Significance Thresholds	25	25	None	None	None	None
Exceeds Threshold?	No	No	N/A	N/A	N/A	N/A

Source: CalEEMod version 2022, updated by Aspen Environmental Group. Refer to Appendix A-1 of this Initial Study for model outputs.

As shown in Table 3, the Project's overall operational emissions would be below the VCAPCD daily emissions thresholds of 25 lbs/day for ozone precursors. The following types of sources were included.

Mobile Sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Project-generated vehicle emissions are based on the use of CalEEMod as recommended by the VCAPCD, considering up to 325 vehicle trips, daily. The vehicle trips would be a split of 273 daily light-duty vehicle trips (worker commutes) and 52 daily heavy-duty truck trips for the warehouse. As shown in Table 3, the anticipated mobile source emissions from the Project would not exceed VCAPCD thresholds for criteria pollutants.

Area Sources. Area source emissions would be generated due to on-site use of consumer products, architectural coating, and landscaping.

Energy Use. Energy-related emissions would be generated due to electricity and natural gas usage associated with the Project. Primary uses of electricity and natural gas by the Project would be for miscellaneous equipment, space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.

Off-Road Equipment. The Project operations would include use of off-road equipment, for cargo handling. The emissions estimates assume that the Project would include up to 4 diesel forklifts, each operating up to eight hours per day.

Stationary Sources, Emergency Backup Generator. Stationary sources include the emissions-generating equipment associated with Project operations. To support warehouse use, emissions estimates assume that a diesel backup generator would be used in the event of a power failure. Generator use would not be part of the Project's normal daily operations. Nonetheless, emissions associated with one emergency backup generator are included based on the specifications in the Air Quality Assessment (prepared by Kimley-Horn, see Appendix A). If a backup generator is required, the end user would be required to obtain a permit from the VCAPCD before installation. Emergency backup generators must comply with the California Air Toxic Control Measure (ATCM) for Stationary Diesel Engines and VCAPCD Rule 74.9 (Stationary Internal Combustion Engines), which would minimize emissions.

Summary of Operational Emissions. As shown in Table 3, the Project's operational emissions would not exceed VCAPCD thresholds of 25 pounds per day for ozone precursors. As a result, operational emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to VCAPCD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant.

Cumulative Short-Term Emissions

The SCCAB is designated nonattainment for O_3 and PM_{10} for State standards and nonattainment for O_3 for Federal standards. VCAPCD significance thresholds are designed to ensure compliance with both National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) and based on projected emissions in the SCCAB. Therefore, if a project is predicted to not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCCAB would not be cumulatively considerable for those pollutants that are in nonattainment in the SCCAB. As discussed above, quantitative thresholds for temporary construction impacts have not been established by the VCAPCD, but the VCAPCD recommends implementation of dust control measures. The Project would be required to comply with VCAPCD Rule 55 (Fugitive Dust) to incorporate dust control measures during construction to ensure construction dust emissions are not generated in quantities that would cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or endanger the comfort, repose, health, or safety of any such person or the public. As such, the proposed Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction (Kimley-Horn, 2024a).

Cumulative Long-Term Impacts

Separate significance thresholds for cumulative operational emissions have not been established by the VCAPCD. Air emissions have an inherently cumulative impact. As such, no single project is significant enough to result in nonattainment of ambient air quality standards, and individual project emissions

contribute to existing cumulatively significant adverse air quality impacts. Operational thresholds of significance have been developed by the VCAPCD based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCCAB's existing air quality conditions. Therefore, a project that exceeds these thresholds would also have a cumulatively considerable contribution to a significant cumulative impact (Kimley-Horn, 2024a).

As shown in Table 3, the proposed Project's operational emissions would not exceed VCAPCD thresholds. As such, operational emissions of the proposed Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. In addition, adherence to VCAPCD rules and regulations would prevent potential impacts related to cumulative conditions on a project-by-project basis. Therefore, Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant, and mitigation is not required (Kimley-Horn, 2024a).

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

LESS-THAN-SIGNIFICANT IMPACT.

Carbon Monoxide Hotspots

An analysis of Carbon Monoxide (CO) "hot spots" is needed to determine whether the change in the level of service (LOS) of an intersection resulting from the proposed Project would have the potential to result in exceedances of the CAAQS or NAAQS. CO exceedances are recognized as being caused by vehicular emissions, primarily when vehicles are idling at intersections. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). CO concentrations have steadily declined due to the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. Accordingly, even very busy intersections do not result in exceedances of the CO standard (Kimley-Horn, 2024a).

The SCCAB is currently designated as attainment for both the 1-Hour and 8-Hour State and federal CO standards. The primary sources of diesel exhaust particulates in the Project vicinity are vehicles traveling along Guardian Street and Tapo Canyon Road. According to the Simi Valley General Plan Environmental Impact Report, Tapo Canyon Road from Los Angeles Avenue to Royal Avenue has a volume of 14,300 average daily trips and 2,700 average daily trips from Royal Avenue to Guardian Way. Tapo Canyon Road is therefore considered a high-volume roadway, which produces pollutants near the Project site.

A project's localized air quality impact is considered significant if CO emissions create a hotspot where either the State one-hour standard of 20 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm is exceeded. This typically occurs at severely congested intersections (LOS E or worse). Because the Project would not result in a substantial increase in vehicle trips when compared to the existing conditions, traffic generated by the Project would not result in exposing existing sensitive receptors to substantial pollutant concentrations. The Project would not result in a CO hotspot and would have less-than-significant impacts in regard to sensitive receptors.

Construction-Related Diesel Particulate Matter

Construction would result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to toxic air contaminant (TAC) emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer (Kimley-Horn, 2024a).

The use of diesel-powered construction equipment would be temporary and episodic. Therefore, the duration of exposure would be short-term and exhaust from construction equipment would dissipate rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. The California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction would be temporary and transient throughout the Project site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time which would limit the exposure of any proximate individual sensitive receptor to TACs (Kimley-Horn, 2024a).

Additionally, construction is subject to and would comply with California regulations (e.g., California Code of Regulations, Title 13, Sections 2485 and 2449), which reduce DPM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles and limit the idling of heavy-duty construction equipment to no more than five minutes. These regulations would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the Project site (i.e., construction is not likely to occur in any one location for an extended time), the dose of DPM of any one receptor is exposed to would be limited (Kimley-Horn, 2024a).

Therefore, considering the relatively short duration of DPM-emitting construction activity at any one location, and the highly dispersive properties of DPM, sensitive receptors, such as those at American Jewish University – Brandeis Bardin Campus, would not be exposed to substantial concentrations of construction-related TAC emissions. Impacts would be less than significant.

Operational Diesel Particulate Matter

The CARB Land Use Handbook includes recommendations for siting new sensitive land uses near specific sources of air pollution such as distribution centers. Recommended minimum separation between sensitive land uses and existing sources of pollutants are intended to reduce health risks from air pollution. Based on CARB recommendations, siting new sensitive receptors within 1,000 feet of a distribution center that generates more than 100 trucks per day should be avoided. According to Project trip generation estimates, the proposed Project would generate 52 daily heavy-duty truck trips. Therefore, considering the anticipated number of daily trucks, highly dispersive properties of DPM, and the distance of the nearest sensitive receptors (200 feet south of the Project site), sensitive receptors would not be exposed to substantial concentrations of operational TAC emissions. Impacts would be less than significant (Kimley-Horn, 2024a).

Criteria Pollutant Health Impacts

The VCAPCD has set its CEQA significance thresholds to correlate with the trigger levels for the federal New Source Review (NSR) Program and VCAPCD Rule 26 for new or modified sources. The NSR Program was created by the Federal Clean Air Act (FCAA) to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the VCAPCD's emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

NO_X and ROG are precursor emissions that form O_3 in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so O_3 may be formed at a distance downwind from the sources.

Breathing ground-level O_3 can result in health effects that include reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily O_3 concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that O_3 can make asthma symptoms worse and can increase sensitivity to asthma triggers.

The VCAPCD's 2022 AQMP focuses on the 2018 8-hour ozone standard and presents a combined local and State clean air strategy based on concurrent ROG and NO_X emission reductions. The largest source of NO_X emissions (an O_3 precursor) in 2018 were related to on-road sources. Although vehicle miles traveled in the SCCAB continue to increase, NO_X and ROG levels are decreasing because of the mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to the use of cleaner fuels and renewable energy. The 2022 AQMP demonstrates that the VCAPCD can achieve attainment of the 2015 federal 8-hour standard by 2027. In addition, since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.

It is difficult to directly correlate specific health effects that will occur as a result of a project's significant criteria air pollutant emissions. Generally, models that correlate criteria air pollutant concentrations with specific health effects focus on regulatory decision-making that will apply throughout an entire air basin or region. These models focus on the region-wide health effects of pollutants so that regulators can assess the costs and benefits of adopting a proposed regulation that applies to an entire category of air pollutant sources, rather than the health effects related to emissions from a specific proposed project or source. Because of the scale of these analyses, any one project is likely to have only very small incremental effects which may be difficult to differentiate from the effects of air pollutant concentrations in an entire air basin. In addition, such modeling efforts are costly, and the value of a project-specific analysis may be modest in relation to that cost. Furthermore, the results, while costly to produce, may not be particularly useful. For regional pollutants, it is difficult to trace a particular project's criteria air pollutant emissions to a specific health effect. Moreover, the modeled results may be misleading because the margin of error in such modeling is large enough that, even if the modeled results report a given health effect, the model is sufficiently imprecise that the actual effect may differ from the reported results; that is, the modeled results suggest precision, when in fact available models cannot be that precise on a project level.

The mass emissions thresholds developed by VCAPCD and used by CEQA lead agencies throughout Southern California to determine potential significance of project-related regional changes in the environment are not directly indicative of exceedances of applicable ambient air standards. Meteorology, the presence of sunlight, and other complex chemical factors all combine to determine the ultimate concentration and location of O_3 or PM. The effects on ground-level ambient concentrations of pollutants that may be breathed by people are also influenced by the spatial and temporal patterns of the emission sources. In other words, the effect on O_3 and PM concentrations from a given mass of pollutants emitted in one location may vary from the effect if that same mass of pollutants was emitted in an entirely different location in the SCCAB. The same effect may be observed when the daily and seasonal variation of emissions is taken into account. Regional-scale photochemical modeling, typically performed only for NAAQS attainment demonstration and rule promulgation, account for these changes in the spatial, temporal, and chemical nature of regional emissions.

Emissions from Project construction and operation would vary by time of day, month, and season, and the majority of Project-related emissions, being generated by mobile sources driving to and from the site,

would be emitted throughout a wide area defined by the origins and destinations of people travelling to and from the proposed Project.

The Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level (Kimley-Horn, 2024a). As previously discussed, Project emissions would be less than significant and would not exceed VCAPCD thresholds (refer to Table 3). Localized effects of on-site Project emissions on nearby receptors were also found to be less than significant. Short- and long-term emissions from the Project are not expected to cause or contribute to an exceedance of the most stringent applicable state or federal ambient air quality standards. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations. Therefore, impacts would be less than significant, and no mitigation is required.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

NO IMPACT. The VCAPCD Guidelines identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the VCAPCD as odor sources. During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment and asphalt). These odors are a temporary short-term impact that is typical of construction projects and would disperse rapidly. Therefore, the Project would not create objectionable odors (Kimley-Horn, 2024a).

3.6. Biological Resources

BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(b) 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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒
(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?	☐	☒	☐	☐
(e) 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?	☐	☐	☐	☒

3.6.1. Environmental Impacts

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. No native plant communities or habitats occur within the Project site because it is entirely developed with an existing building and paved parking lot. According to the Biological Resources Assessment prepared by South Environmental in August 2023 (see Appendix B), no special-status plants or animals were observed within the Project site (South Environmental, 2023a). The Project's direct impacts would occur in existing developed areas where no habitats occur. The developed areas do not support special-status species due to a lack of habitat, and the existing developments preclude special-status species from establishing there in the future. Because the Project site and surrounding areas are developed and lack native habitats, no direct impacts to habitat would occur from the proposed Project.

One candidate species for listing under the California Endangered Species Act (CESA), Crotch bumble bee (*Bombus crotchii*) does have a potential to be present in the Project site and was omitted from the

Biological Resources Assessment. This species is found between San Diego and Redding in a variety of habitats, including open grasslands, shrublands, chaparral, and semi-urban settings (CDFW, 2022). The Crotch bumble bee nests underground in grassland and scrub habitats and tolerates hot and dry environments. Because most of the site is paved and developed, the Crotch bumble bee is not expected to nest within the Project site. The species forages on a wide variety of plants, including milkweed, lupine, sage buckwheat, and poppy (Hatfield et al., 2015). Additionally, many recent observations of Crotch bumble bees have been on ornamental species such as petunias, lavenders, sages, and others (iNaturalist, 2024). It has a low potential to traverse the Project site and may forage on ornamental plants in landscaped areas. If foraging Crotch bumble bees are present during Project activities, they are expected to leave the Project site on their own and impacts to the Crotch bumble bee would therefore be less than significant. Any impacts to Crotch bumble bee would also not constitute "take"[2] under CESA and an Incidental Take Permit from the California Department of Fish and Wildlife (CDFW) would not be required.

Additionally, one CDFW watch list species, Cooper's hawk (*Accipiter cooperii*) has a high potential to forage within the Project site and low potential to nest there. This species was included in the Biological Resources Assessment but was determined to have no potential to be present. Cooper's hawks have no formal protection, beyond the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. If present, impacts to Cooper's hawk would be avoided or minimized through the implementation of Mitigation Measure (MM) BIO-1; therefore any impacts to Cooper's hawk would be less than significant.

In addition to the special-status species discussed above, all native birds in California are projected by the MBTA and California Fish and Game Code. Trees, shrubs, and structures on the Project site and in the open space adjacent to the Project could provide potential nesting habitat. If nests are present during the initiation of Project activities, active nests, eggs, or young could be destroyed or otherwise disturbed to a point at which the young do not survive, which would be a violation of the MBTA and California Fish and Game Code. In addition, indirect impacts from construction noise or vibration have the potential to disturb an active bird nest to the point of failure if the nest Is within the immediate vicinity of Project construction activities resulting in the violation of the MBTA and California Fish and Game Code. To avoid impacts to active bird nests, eggs, or young, preconstruction nesting bird surveys and monitoring would be implemented during construction activities as described in MM BIO-1. Impacts would be reduced to less than significant with implementation of MM BIO-1.

Mitigation Measure

MM BIO-1 Pre-construction Nesting Bird Survey and Avoidance.

- Ground-disturbing activities and vegetation removal (including tree trimming) may only occur outside the bird nesting season (September 1-January 31).
- If ground-disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (February 1-August 31), a pre-construction survey for nesting birds must be conducted by a qualified avian biologist with prior experience conducting nest bird surveys for construction projects. A qualified biologist must meet the minimum qualifications for Biological Consultants as listed below:
  - Must have an undergraduate or graduate degree with coursework in biology, botany, wildlife biology, natural resources, ecology, conservation biology, or environmental biology;

[2] Fish and Game Code section 86 defines "take" as hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (CDFW, 2024).

- Have an up-to-date subscription to and experience using the California Natural Diversity Database/BIOS;
- 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
- 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.

- The study area includes the Project site and a 100-foot buffer around the Project site. If no active nests are found, no additional measures are required.
- If active nests are found, the avian biologist must map the location and document the species and nesting stage. The qualified avian biologist must implement an avoidance buffer area appropriate to the species. The avian biologist may change the avoidance buffer if field observations of bird behavior and biology to ensure the nest is unaffected by Project activities, avoiding a risk of nest failure. The nest site would be fenced and/or flagged in all directions, and this area may not be disturbed until the nest becomes inactive.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

NO IMPACT. The Project site is entirely developed, and no riparian habitat or sensitive natural communities are located on site. Meier Canyon Creek is located approximately 450 feet west of the Project site, just west of Peppertree Lane. The Project site includes one existing stormwater discharge pipe that flows into a catch basin at the northwest corner of the Project site, which discharges runoff from the existing office building and paved areas to Meier Canyon Creek. Project construction activities would occur within the limits of the Project site boundary, and no temporary or permanent loss of riparian vegetation would occur. Although Meier Canyon Creek would receive seasonal stormwater flows that are diverted from the Project site, these impacts would remain the same as they do under existing conditions, as the site is currently paved and developed with an office building and parking lot. The existing outlet would be retained to continue to convey flows for the proposed Project. No new discharge locations or outlets would be constructed (Delane Engineering, 2024). Therefore, no impact would occur.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) either individually or in combination with the known or probable impacts of other activities through direct removal, filling, hydrological interruption, or other means?

NO IMPACT. The State Water Resources Control Board (SWRCB) defines a state wetland, or "waters of the state" as "any surface water or groundwater, including saline waters, within the boundaries of the state" (SWRCB, 2021). As described in Section 3.6.1(b), Meier Canyon Creek is an intermittent stream located approximately 450 feet west of the Project site. While this water body is likely a water of the state and CDFW jurisdictional streambed, the proposed Project does not include any activities that would result in removal, filling, or other direct impact to this aquatic resource. All Project construction and operations activities would occur outside of this water body. Although the Project site is connected to Meier Canyon Creek by an existing storm drain system, construction activities would be required to comply with the SWRCB Construction Stormwater Program to minimize stormwater discharges from activities such as earthwork. The construction contractor would be required to obtain coverage under the NPDES General

Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (SWRCB, 2024a). Therefore, impacts associated with discharge flows during construction would be less than significant.

A federally protected wetland, or "waters of the U.S.," must be a relatively permanent body of water with a continuous surface connection to other relatively permanent bodies of waters or navigable waters. Because Meier Canyon Creek flows intermittently, it is not considered a federally protected wetland. Thus, no impacts to a federally protected wetland would occur.

During Project operations, the site would be operated as a warehouse facility, and all Project activities would occur within the site boundaries. No removal, filling, hydrological interruption, or other activities would occur within Meier Canyon Creek during operations. Stormwater runoff would continue to be diverted to this drainage and would remain the same as existing conditions. No impacts to state or federally protected wetlands would occur.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. The Project site is located on the southern edge of dense urban development in the City of Simi Valley. The site is currently entirely developed and would remain developed under the proposed Project. Open space to the east and west of the Project site provides connectivity to large areas of habitat in the Santa Susana Mountains and Simi Hills. However, this open space is not within the boundaries of the Project site and would remain undeveloped. No new barriers or other developments would be created within the adjacent open space; all components of the proposed Project would occur within existing disturbed and developed land. Therefore, the Project would have no impact on habitat linkages or wildlife movement corridors. The Project does have the potential to impact nesting birds and their nursery sites as discussed in Section 3.6.2(a); however, these impacts would be reduced to less than significant with MM BIO-1 incorporated. Impacts would be less than significant with mitigation.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

NO IMPACT. SVMC § 9-38.030 (Prohibition of Removal) prohibits the removal of protected trees (historic trees, mature native oak trees, or any mature trees). Native oaks and mature trees occur in the landscaped areas on the Project site. In compliance with SVMC § 9-38.040 (Guidelines for Reports on Protected Trees), the Applicant's consultant prepared a Protected Tree Report (Appendix C) (Tree Care Consulting, 2024, provided as Appendix C). Project construction activities would avoid impacts to these trees by following recommendations in the Protected Tree Report. Seven oak trees would be protected in place, and protection zones marked with temporary fencing would be established to avoid impacts to tree branches and roots during demolition and construction. A consulting arborist would observe all earthwork done near protected trees to prevent damage to tree roots. Root pruning, if needed, would be done with sterile, mechanical root pruning equipment accompanied by hand work under supervision of the consulting arborist. These methods would minimize root damage from excavation and grading equipment disturbing roots. Construction activities would avoid nailing items such as grade stakes onto trees. Should any branches be damaged, an arborist would be notified and provide recommendations on how to proceed. No chemicals such as herbicides would be used upstream and within 100 feet of any tree protected zone. Dust deposited on the foliage of trees would be hosed off so that leaves are not smothered by dust particles (Tree Care Consulting, 2024).

One hundred forty-four mature, non-native trees would be removed or transplanted as necessary to accommodate construction of the new warehouse building and parking lot. In compliance with SVMC § 9-38.040 and as recommended by the Certified Arborist, 28 mature oak trees may be transplanted on-site away from the development footprint or removed for resale and offsite transplant (Innes, 2024). The Applicant would coordinate with a reputable tree moving company during these activities. Compliance with SVMC § 9-38.030 and § 9-38.40 and implementation of the Protected Tree Report recommendations would result in less than significant impacts. No mitigation is required.

During operations, all trees would remain in place and would not be disturbed, with the exception of irrigation, as operations would involve activities within and around the warehouse facility. Therefore, no impacts would occur during operations, and no mitigation is required.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or State habitat conservation plan?

NO IMPACT. The Project site is already developed. The site and surrounding areas are not included in any Habitat Conservation Plan or Natural Community Conservation Plan, or any other approved habitat conservation plan. The closest habitat conservation plan area is the Simi Hills Critical Wildlife Passage Area, which is located over 2 miles south of the Project site. Therefore, the Project would have no impact on any adopted conservation plans, and no mitigation is required.

3.7. Cultural Resources

CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(g) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
(h) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
(i) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

3.7.1. Cultural Resources Overview

Cultural Resources Overview

This section provides an analysis of Project impacts on cultural resources, including historical and archaeological resources as well as human remains, and is based on the results of a California Historical Resources Information Center (CHRIS) cultural resources record search conducted by staff at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton; a review of past cultural resources reports; the results of a Sacred Lands File (SLF) Search conducted by the Native American Heritage Commission (NAHC); and an intensive level pedestrian survey of the Project site by a qualified archaeologist.

A detailed report is provided the Cultural Resources Assessment prepared by South Environmental. This report is incorporated by reference and provided in Appendix D (Confidential):

South Environmental. 2023b. Cultural Resources Assessment. Prepared for Dunn Simi, LP. November.

Regulatory Framework

CEQA requires a Lead Agency to determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC] § 21084.1), archaeological resources, or human remains. A historical resource is a resource listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript that a Lead Agency determines to be historically significant (CEQA Guidelines § 15064.5[a][1-3]). Resources listed on the National Register of Historic Places (NRHP) are automatically listed on the CRHR, along with State Landmarks and Points of Interest. The CRHR can also include properties designated under local ordinances or identified through local historical resource surveys. In addition, pursuant to PRC § 5024.1(c), a resource is considered historically significant if it:

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

If it can be demonstrated that a project would cause damage to a unique archaeological resource, the CEQA Lead Agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC § 21083.2[a-b]). PRC § 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Methodology

On July 17, 2023, South Environmental (South) requested a cultural resources records search from the CHRIS to identify any previously recorded cultural resources and previously conducted cultural resources studies within the Project site and a 0.5-mile radius. On August 21, 2023, the SCCIC completed the record search. The search included a review of mapped prehistoric and historic archeological resources and historic built-environment resources, site records, technical reports, archival sources, and ethnographic references. In addition, the SCCIC completed a review of historic maps of the study area, the NRHP, the CRHR, lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility list.

As a result of the record search, the SCCIC identified one previously recorded prehistoric site (lithic scatter) within the Project site which was subject to two salvage excavations in 1984 and 1986. One previously recorded cultural resource was identified within the 0.5-mile radius. Additionally, the SCCIC identified three previous cultural resource studies intersecting the Project site and 16 studies within the 0.5-mile records search radius.

An NAHC SLF search of the Project site and surrounding vicinity was requested on July 18, 2023. The SLF search was completed by the NAHC on August 2, 2023, and had negative results (i.e., no known site-specific information on cultural resources were found).

South also conducted an intensive-level archaeological survey of the Project site on September 11, 2023, which resulted in the identification of two prehistoric isolated artifacts – a quartzite core and a hand stone, likely associated with the previously record site identified during the record search (South Environmental, 2023b). The Project site is fully developed and has been subject to a large amount of previous ground disturbance (South, 2023b).

3.7.2. Environmental Impacts

a. Would the project cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5 [§15064.5 generally defines historical resource under CEQA]?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. No historical resources were identified within the Project site through the record search or survey. Two isolated prehistoric artifacts were identified along the south and southeastern boundaries of the Project site through the intensive-level archaeological survey, likely associated with the previously recorded prehistoric age lithic scatter identified within the Project site as part of the record search. This site was subject to two salvage excavations in 1984 and 1986. Although proposed ground disturbance would primarily occur within previously disturbed soil during

construction, original grading plans from 1989 and historic aerial photographs of the Project site indicate that portions of the edges where the isolated prehistoric artifacts were identified are less disturbed. Given the high sensitivity of the area, it is possible that archaeological deposits could be encountered at deeper levels or within the less disturbed outer edges. Therefore, a Worker Environmental Awareness Program (WEAP) training session is recommended before construction, and archaeological and Native American monitoring is recommended for all ground disturbance based on the sensitivity of the site. Impacts to historical resources would be reduced by implementation of MMs CUL-1, CUL-2, CUL-3, and CUL-4 by requiring a WEAP training before construction, archaeological and Native American monitoring, and protocols for unanticipated discovery of cultural resources and human remains. With implementation of MMs CUL-1, CUL-2, CUL-3, and CUL-4, impacts to cultural resources would be less than significant with mitigation.

Mitigation Measures

CUL-1 Cultural Resources WEAP Training

Before construction, the Permittee must contract with a qualified archaeologist and local Native American monitor to develop Worker Environmental Awareness Program (WEAP) for all personnel involved in Project construction, including field consultants and construction workers. The one-time WEAP training session must be conducted before any Project-related construction activities in the Project site. The WEAP will include relevant information regarding the archaeological sensitivity of the area, including applicable regulations, protocols for unanticipated discoveries, and consequences of violating state laws and regulations. The WEAP will also describe appropriate avoidance and impact minimization measures for cultural resources and tribal cultural resources that could be located at the Project site and will outline further steps needed and who to contact if any potential cultural resources or tribal cultural resources are encountered. The WEAP will emphasize the requirement for confidentiality.

The Permittee must submit the WEAP to the City of Simi Valley (City) for review and approval before implementation. All workers, contractors, and visitors must attend the WEAP before entering the Project site and performing any work. The Permittee must provide copies of the training attendance sheets monthly to City staff as a record of compliance with this measure.

CUL-2 Archeological and Native American Monitoring

Prior to the commencement of construction, the Permittee will secure the services of a Native American Monitor from the Fernandeño Tataviam Band of Mission Indians and a qualified archaeological monitor to observe all ground-disturbing activity (i.e clearing, grubbing, grading, trenching, etc.) on a full-time basis. A copy of the contracts or monitoring agreements will be sent to the City of Simi Valley for their review and approval.

CUL-3 Unanticipated Discovery of Cultural Resources

If archaeological resources are encountered during ground disturbing activity on the site, all activity within a 100-foot radius of the find must be stopped, the City of Simi Valley must be notified, and a qualified archaeologist and Fernandeño Tataviam Band of Mission Indians Native American monitor must examine the find. The archaeological and Native American monitors must evaluate the find to determine if it meets the definition of a historical, unique archaeological, or tribal cultural resource and make appropriate recommendations regarding the disposition of such finds prior to issuance of building

permits for any construction occurring within the above-referenced 100-foot radius. The City of Simi Valley will consult in good faith with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any tribal cultural resource encountered. If the find(s) do not meet the definition of a historical, unique archaeological, or tribal cultural resource, no further study or protection is necessary prior to project implementation. If the find does meet the definition of a historical, unique archaeological, or tribal cultural resource, then it will be avoided by project activities. If avoidance is not feasible, adverse effects to such resources will be mitigated in accordance with the recommendations of the archaeological and Native American monitor. Recommendations may include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery must be submitted to the City of Simi Valley, Native American Heritage Commission (tribal cultural resources), and the South Central Coastal Information Center.

The Permittee will ensure that construction personnel do not collect or move any cultural material and will ensure that any fill soils that may be used for construction purposes does not contain any archaeological materials.

CUL-4 Unanticipated Discovery of Human Remains

If human remains are discovered during excavation or grading of the site, all activity within a 100-foot radius of the find will be stopped. The Ventura County Coroner must be notified immediately and will determine whether the remains are of Native American origin or an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of the identification. Once the NAHC identifies the most likely descendant(s) (MLD), the descendant(s) will make recommendations regarding proper burial (including the treatment of grave goods), which will be implemented in accordance with section 15064.5(e) of the California Code of Regulations, Title 14. The archaeologist will recover scientifically valuable information, as appropriate and in accordance with the recommendations of the MLD. A report of findings documenting any data recovery must be submitted to the City of Simi Valley, the South Central Coastal Information Center, and the MLD.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. As discussed above, no unique archaeological resources have been identified within the Project site. The high sensitivity of the area indicates the potential that archaeological deposits could be encountered at deeper levels of excavation and in less disturbed areas. Impacts that would cause a substantial adverse change in the significance of an archaeological resource would be avoided with implementation of MMs CUL-1, CUL-2, CUL-3, and CUL-4, which require WEAP training before construction, archaeological and Native American monitoring, and protocols for unanticipated discovery of cultural resources and human remains. Impacts would be less than significant with mitigation.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. No known human remains, or informal, undocumented cemeteries were identified within the Project area as a result of the record search, archival research, NAHC SLF Search, or intensive pedestrian survey. In the unlikely event unknown buried human

remains are encountered during ground disturbing activity, the implementation of MMs CUL-1, CUL-2, CUL-3, and CUL-4 would reduce potential impacts to a less-than-significant level. Impacts would be less than significant with mitigation.

3.8. Energy

ENERGY Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Result in 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?	☐	☐	☒	☐

3.8.1. Environmental Impacts

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would consume energy resources in the form of non-renewable fossil fuels and electricity for site power. Construction would involve the short-term use of transportation fuels and electricity by various equipment. Construction would last approximately 18 months.

Operation of the proposed Project would require the intermittent use of fuel for vehicles transporting goods and for other equipment used for warehouse operations. Energy in the form of electricity for warehouse and office operations would also be required. Statewide policies and programs promote the use of renewable resources in the electricity supply and reduction in the carbon-intensity of transportation fuels. Implementation of the State of California's Low-Carbon Fuel Standard regulations and the State's long-term goal for carbon neutrality by 2045 or earlier require transportation fuels used in California to transition to renewable fuel sources or zero-emission technologies. The electricity supply is on a long-term trend of decarbonization as a result of California's Renewable Portfolio Standard. Over time, increasing portions of the Project's on-site and off-site energy use would be provided from renewable supplies that would decrease the Project's use of non-renewable fuels.

Construction and operation of the proposed facility would occur on the site in a manner consistent with existing land uses in area and would provide warehouse services. As such, the proposed Project would not use non-renewable energy resources in a wasteful or inefficient manner. Use of energy resources to support the proposed Project would not constitute wasteful, inefficient, or unnecessary consumption; therefore, impacts are less than significant, and no mitigation is required.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would result in the construction and operation of a warehouse facility. The proposed Project would not conflict with adopted state or local renewable energy or energy plans. The Proposed Project would not require the removal of any existing renewable energy infrastructure, such as solar or wind-powered electric generating facilities. The City would need to issue Building and Safety Permits for new buildings and would ensure compliance with energy efficiency requirements under the California Green Building Code and Appliance Efficiency Regulations (Title 24 and Title 20 of the California Code of Regulations, respectively, as adopted by the SVMC). The City is responsible for design, inspection, management, and oversight of construction projects to ensure projects

comply with energy efficiency requirements. Energy necessary to develop and operate the proposed facility would be used efficiently and would represent a negligible portion of state-wide energy consumption. Therefore, the proposed Project would not conflict with plans for renewable energy or energy efficiency, and this impact would be less than significant, and no mitigation is required.

3.9. Geology and Soils

GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☒	☐
(b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(c) Be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
(d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐			☐
(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?	☐	☐	☐	☒
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

3.9.1. Environmental Impacts

a. Would the project 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.

NO IMPACT. The Project site is located in a seismically active area of Southern California with numerous active faults in the vicinity; however, no Alquist-Priolo Fault Zones or other known Quaternary faults cross or are adjacent to the Project (DOC, 2024a; USGS, 2024a). The closest Alquist Priolo Fault Zone to the Project is the Simi Fault, which is part of the Simi-Santa Rosa Fault Zone and is located approximately 2.3 miles north of the Project (DOC, 2023). The closest Quaternary fault to the Project is the Simi-Santa Rosa Fault Zone, located approximately 2.5 miles to the north (USGS, 2024b). Therefore, no impact would occur, and no mitigation is required.

ii. Strong seismic ground shaking?

LESS-THAN-SIGNIFICANT IMPACT. The Project area would likely be subject to ground shaking associated with earthquakes on local and regional active faults. The intensity of the seismic ground shaking during an earthquake is dependent on the distance between the Project area and the epicenter of the earthquake, the magnitude of the earthquake, and the geologic conditions underlying and surrounding the Project area. Earthquakes occurring on faults closest to the Project area would most likely generate the largest ground motions. Significant active faults near the Project that could generate large earthquakes resulting in seismic ground shaking at the Project site include the following: the Simi-Santa Rosa Fault zone, the Sierra Madre Fault Zone, the Sycamore Canyon fault, the Northridge Hills fault, and the Chatsworth fault (USGS, 2024b). Large earthquakes on other regional faults could also trigger ground shaking at the Project site.

The exposure of people and structures to seismic ground shaking is a potential risk with or without the proposed Project and cannot be avoided. However, incorporation of modern standard engineering and safety standards in Project design and compliance with City engineering criteria and Building and Municipal Codes would minimize adverse effects to people and structures. Emergency planning and coordination would also reduce injuries to on-site personnel during seismic activity. With incorporation of emergency planning and compliance with current regulations and standard engineering practices, this impact would be less than significant, and no mitigation is required.

iii. Seismic-related ground failure, including liquefaction?

NO IMPACT. Liquefaction is the phenomenon in which saturated granular sediments temporarily lose their shear strength during periods of earthquake-induced strong ground shaking. The susceptibility of a site to liquefaction is a function of the depth, density, and water content of the granular sediments and the magnitude and frequency of earthquakes in the surrounding region. Saturated, unconsolidated silts, sands, and silty sands within 50 feet of the ground surface are most susceptible to liquefaction (unconsolidated sediments with groundwater levels of 50 feet below ground surface [bgs] or less). Liquefaction-related phenomena include lateral spreading, ground oscillation, flow failures, loss of bearing strength, subsidence, and buoyancy effects. The California Geological Survey identified the proposed Project site as not within a Liquefaction Hazard zone (DOC, 2024a). Therefore, no impact associated with liquefaction and related ground failures would occur, and no mitigation is required.

iv. Landslides?

LESS-THAN-SIGNIFICANT IMPACT. As discussed in the geotechnical report, the proposed Project is not shown to be in an area susceptible to seismic induced landslides (Gorian & Associates, 2023). However, construction would include cut and fill slopes that would require slope maintenance. Retaining walls would be constructed to provide soil support along adjacent slopes. Federal, State, and local safety regulations and guidelines, and standard geotechnical recommendations would be followed and implemented as part of Project design to reduce the risk of erosion and degradation. Therefore, any potential impacts involving temporary construction slope instability would be less than significant, and no mitigation is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

LESS-THAN-SIGNIFICANT IMPACT. Project construction would include excavation and trenching which would expose and loosen soils, making them susceptible to erosion by wind and water. Potential soil erosion hazards vary depending on the use, conditions, and textures of the soils. The properties of soil that influence erosion by rainfall and runoff affect the infiltration capacity of soil, as well as the resistance of a soil to detachment and being carried away by falling or flowing water. Soils containing high percentages of fine sands and silt and that are low in density are generally the most erodible. As the clay and organic

matter content of soils increases, the potential for erosion decreases. Clays act as a binder to soil particles, thus reducing the potential for erosion. The Project site is underlain by Tertiary-age sedimentary rock referred to as Llajas Formation, locally mantled by a thin layer of Quaternary age Terrace Deposits and engineered fill (Gorian and Associates, 2023). The Llajas Formation consists of siltstone, claystone, shale, and minor fine-grained sandstone, mantled by several feet of older alluvium (Gorian and Associates, 2023). The proposed Project would implement standard construction SWPPP BMPs in compliance with the Construction General Permit to limit erosion from construction activities. Standard erosion control BMPs generally include minimization of disturbed areas, protection of natural features and soil, phased construction activity, controlled stormwater flows, prompt stabilization of soil, and slope protection.

Per the preliminary Geotechnical Report, implementation of a reliable irrigation system that would prevent over-watering, regular maintenance of drainage structures, and control of rodents would reduce the risk of erosion and degradation during operation of the proposed Project (Gorian and Associates, 2023). Implementation of standard BMPs during Project construction and regular maintenance and protection of slopes during operation would reduce potential soil erosion impacts to less than significant. No mitigation measures are required.

c. Would the project be located on geologic units 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?

LESS-THAN-SIGNIFICANT IMPACT. The Project would have a less-than-significant impact regarding landslides, slope stability, and liquefaction as discussed above.

Subsidence is the sinking or gradual lowering of the earth's surface. Subsidence can result from either natural geologic causes such as faulting or from man-made causes such as groundwater pumping or oil and gas production (City of Long Beach, 2023). As groundwater or oil and gas is withdrawn, the pore-pressure in the sediments decreases allowing the weight of the overlying sediment to permanently compact or compress the fine-grained units. The United States Geological Survey (USGS) Land Subsidence in California website includes maps of groundwater and oil subsidence in California and indicates that the proposed Project is not located in an area of groundwater or oil subsidence (USGS, 2024b.). Accordingly, the proposed Project would not exacerbate subsidence in the area, and impacts resulting in subsidence would be less than significant. No mitigation is required.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. Expansive soils are characterized by their ability to undergo great volume change (shrink and swell) due to variation in soil moisture content. Changes in soil moisture could result from several factors, including rainfall, landscape irrigation, utility leakage, and/or perched groundwater. Expansive soils are typically very fine grained with a high to very high percentage of clay. The geotechnical report recommends conducting soil samples after completion of grading, which is a standard practice (Gorian and Associates, 2023). In addition, MM GEO-1 is recommended per geotechnical design recommendations to reduce potential adverse effects of expansive soils, which includes requiring: positive drainage to be continually provided and maintained away from structures; repairing plumbing leaks to avoid saturation of subgrade soils; avoiding landscaping where roots can damage foundations; and maintaining minimal but uniform landscape watering. With implementation of MM GEO-1, impacts would be less than significant.

Mitigation Measure

GEO-1 Drainage and Landscaping Maintenance

The construction contractor must adhere to the following maintenance protocols for construction on expansive soils on the Project site:

- Positive drainage must be continually provided and maintained away from structures and must not be changed creating an adverse drainage condition. Plumbing leaks must be immediately repaired so the subgrade soils underlying the structure do not become saturated.
- Initial landscaping must be undertaken in unpaved areas adjacent to structures. Trees and shrubbery must not be planted where roots can grow under foundations and hardscape when they mature.
- Landscaped areas must be maintained in a uniformly moist condition and not allowed to dry out.

e. Would the project 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?

NO IMPACT. The Proposed Project would be connected to municipal sanitary sewer lines. Septic tanks and alternative wastewater disposal would not be used. No impact would occur, and no mitigation is required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. The Project site is underlain by Tertiary-age sedimentary rock referred to as Llajas Formation locally mantled by a thin layer of Quaternary age Terrace Deposits and engineered fill alluvium (Gorian and Associates, 2023). The Llajas Formation consists of siltstone, claystone, shale, and minor fine-grained sandstone, mantled by several feet of older alluvium (Gorian and Associates, 2023). Southern Environmental conducted a paleontological records search in 2023, which indicated that while no paleontological localities are recorded within the Project site, there are four nearby recorded localities from the same sedimentary deposits that occur within the Project site, either at the surface or at depth (Southern Environmental, 2023). Based on the results of the paleontological record search of the Project area and vicinity, potential fossil-bearing units are present in the Project area and as such, paleontological resources could be encountered during excavation. The following mitigation measures, MM GEO-2 through GEO-5, are recommended to ensure that potential impacts to any unique paleontological resources that may be present would be reduced to a less-than-significant level.

Mitigation Measures

GEO-2 Paleontological Resource Monitoring and Mitigation Plan

Before the start of any Project-related construction activities, the Permittee must retain a State-approved paleontologist (Project Paleontologist) to prepare and implement a project-specific Paleontological Resource Monitoring and Mitigation Plan (PRMMP), which must be approved by the City of Simi Valley Environmental Services Director. The Project Paleontologist is responsible for implementing all the paleontological conditions of approval and for using qualified paleontologists to assist in work and field monitoring. 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 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;
- 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;
- Proficiency in recognizing fossils in the field and determining their significance;
- Expertise in local geology, stratigraphy, and biostratigraphy; and
- Experience collecting vertebrate fossils in the field.

At a minimum, information to be contained in the PRMMP, in addition to other information required under the guidelines of the Society of Vertebrate Paleontology (SVP), is as follows:

- Description of the Project site and planned earthwork and excavation, and a map identifying locations where excavations and ground disturbing activities will or will be likely to encounter paleontological resources.
- The museum or repository that has agreed to accept the recovered fossils must be identified in the PRMMP.
- The PRMMP must detail methods of monitoring, recovery, preparation, and analysis of specimens, data analysis, reporting, and the final curation location of specimens at an identified repository.
- Identification of personnel with authority and responsibility to temporarily halt or divert ground disturbance activities to allow for recovery of significant specimens.
- The PRMMP must be submitted to the City of Simi Valley Environmental Services Director for review and approval 60 days before the start of Project construction.

GEO-3 Paleontological Resources WEAP Training.

Before the start of Project-related construction activities, a WEAP must be developed by the Project Paleontologist. The WEAP must address the potential to encounter paleontological resources in the field, the sensitivity and importance of these resources, and the obligations to preserve and protect such resources consistent with Society of Vertebrate Paleontology standard procedures. The training program must also include the set of reporting procedures that workers are to follow if paleontological resources are encountered during Project activities. The WEAP may be combined with other environmental training programs for the Project. All field personnel will receive WEAP training on paleontological resources before Project-related construction activities.

GEO-4 Paleontological Monitoring and Fossil Recovery

The Project Paleontologist must monitor the Project site. Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. If the Project Paleontologist determines full-time monitoring is no longer warranted, based on the geologic conditions at depth, he or she may recommend to the City of Simi Valley Environmental Services Director that monitoring be reduced or cease entirely.

- If fossils are discovered, the Project Paleontologist must temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. The Paleontological Monitor, and/or Project Paleontologist must evaluate the discovery and determine if the fossil may be considered significant, and if significant, recover the fossil.
- Upon completion of Project ground disturbing activities, all significant fossils collected would 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 fossil specimens must be identified to the lowest taxonomic level practical before curation at an accredited museum. The fossil specimens must be delivered to the approved repository (identified in the Paleontological Resource Mitigation Plan) and receipt(s) of collections submitted sent to the City of Simi Valley Environmental Services Director no later than 60 days after all ground disturbing activities are completed.

MM GEO-5 Paleontological Resources Monitoring Report. The Permittee must prepare a paleontological resource mitigation and monitoring report by the Project Paleontologist following completion of ground disturbing activities. The contents of the report must include, but not be limited to a description and inventory list of recovered fossil materials (if any); a map showing the location of paleontological resources found in the field; determinations of scientific significance; proof of accession of fossil materials into the pre-approved museum or other repository; and a statement by the Project Paleontologist that Project impacts to paleontological resources have been mitigated.

3.10. Greenhouse Gas Emissions

GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

3.10.1. Environmental Impacts

This section introduces general information on greenhouse gas (GHG) emissions and provides data on the existing GHG emissions at the Project site and detailed analysis on Project GHG emissions, provided in detail in the Greenhouse Gas Emissions Assessment for 4100 Guardian Street Warehouse Project, prepared by Kimley-Horn and Associates, Inc. This report is incorporated by reference and provided in Appendix E:

> Kimley-Horn. 2024b. Greenhouse Gas Emissions Assessment, 4100 Guardian Street Warehouse Project, City of Simi Valley, California. February.

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

LESS-THAN-SIGNIFICANT IMPACT.

Short-Term Construction Greenhouse Gas Emissions

The Project would result in direct emissions of GHGs from demolition and construction. The approximate quantity of GHG emissions generated during each anticipated year of construction activity is provided in Table 4.

Table 4. Construction-Related Greenhouse Gas Emissions

Category	$MTCO_2e$
2024 Construction	318
2025 Construction	505
Total Construction Emissions	823
30-Year Amortized Construction	28

Source: CalEEMod version 2020. Refer to Appendix A for model outputs in the GHG Assessment prepared by Kimley-Horn (Kimley-Horn, 2024b, provided as Appendix E).

As shown, the Project would cause the generation of approximately 823 metric tons of carbon dioxide-equivalent (MTCO2e) during demolition and construction. Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions (SCAQMD, 2008). The amortized Project construction emissions would be 28 MTCO2e per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project after construction activities conclude. These GHG emissions would come from direct emissions such as Project generated motor vehicle traffic, equipment to support warehouse operations, including forklifts and potentially a backup generator, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions also come from indirect sources, such as off-site generation of electrical power, use of energy required to convey water to and treat wastewater from the Project, solid waste disposal, and any fugitive leaks of refrigerants from air conditioning or refrigerators.

Total GHG emissions associated with the Project are summarized in Table 5, Project Greenhouse Gas Emissions. These emission estimates conservatively assume no baseline activity occurs at the site, and all proposed Project operations could be considered net new emissions.

Table 5. Project Greenhouse Gas Emissions

Source Type	Project GHG Emissions (MTCO2e per Year)
Mobile Sources	1,622
Area Sources	2.63
Energy Use	437
Water	124
Waste	52.7
Refrigerants	< 0.005
Off-Road Equipment	110
Stationary Sources	14.3
Total Operational GHG Emissions	**2,362**
Amortized Construction GHG Emissions	28
Total Annual GHG Emissions	**2,390**
Threshold	**3,000**
Exceeds Threshold?	**No**

Source: CalEEMod version 2022. Refer to Appendix A in GHG Assessment for model outputs (Kimley-Horn, 2024b, provided as Appendix E).

As indicated in Table 5, the Project would generate approximately 2,390 MTCO2e annually. Because GHG emissions would not exceed the 3,000 MTCO2e threshold, the impact of Project GHG emissions on the environment would be less than significant, and no mitigation is required.

b. Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

LESS-THAN-SIGNIFICANT IMPACT.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted Connect SoCal (2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy [RTP/SCS]). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions,

tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 (passed in 2006, California Health and Safety Code § 38500 et seq.) and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15. The RTP/SCS contains over 4,000 transportation Projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone. The RTP/SCS is an important planning document for the region, allowing Project sponsors to qualify for federal funding. The plan accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and FCAA requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the State. The Project's consistency with the RTP/SCS goals is analyzed in detail in Table 6 (Kimley-Horn, 2024b).

Table 6. Regional Transportation Plan/Sustainable Communities Strategy Consistency

SCAG Goals	Compliance
GOAL 1: Encourage regional economic prosperity and global competitiveness.	N/A: This is not a Project-specific policy and is therefore not applicable.
GOAL 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	N/A: Although this Project is not a transportation improvement project, the Project is located 1.2-mile south of SR-118 with access via Tapo Canyon Road.
GOAL 3: Enhance the preservation, security, and resilience of the regional transportation system.	N/A: This is not a transportation improvement project and is therefore not applicable.
GOAL 4: Increase person and goods movement and travel choices within the transportation system.	N/A: As the proposed Project is not a transportation improvement Project, Goal 4 is not applicable. However, the Project includes a use that would support goods movement.
GOAL 5: Reduce greenhouse gas emissions and improve air quality.	Consistent: The reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques. The proposed Project is required to comply with the provisions of the California Building Energy Efficiency Standards and the Green Building Standards Code (CALGreen). Further, the Project is located in proximity to existing truck routes and freeways. Location of the Project within a developed area would reduce trip lengths, which would reduce GHG and air quality emissions.

GOAL 6: Support healthy and equitable communities.	Consistent: As discussed in the Project's Air Quality Assessment, the Project does not exceed applicable emissions thresholds. Based on the Friant Ranch decision, projects that do not exceed localized thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.
GOAL 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	N/A: This is not a Project-specific policy and is therefore not applicable.
GOAL 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel	N/A: As the proposed Project is not a transportation improvement Project, Goal 8 is not applicable.
GOAL 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	N/A: As the proposed Project is not a housing development Project, Goal 9 is not applicable.
GOAL 10: Promote conservation of natural and agricultural lands and restoration of habitats.	N/A: The Project is not located on agricultural lands.

Source: Southern California Association of Governments, Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy, 2020) from the GHG Assessment prepared by Kimley-Horn (Kimley-Horn, 2024b, provided as Appendix E).

Compliance with applicable State standards would ensure consistency with State and regional GHG reduction planning efforts. The goals stated in the RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in Table 6, the proposed Project would be consistent with the stated goals of the RTP/SCS. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets (Kimley-Horn, 2024b).

Consistency with the 2022 CARB Scoping Plan

CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with Assembly Bill (AB) 1279, passed in 2022 (§ 38562.2 of the California Health and Safety Code). To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan [CAP]) consistent with CEQA Guidelines § 15183.5 (Kimley-Horn, 2024b).

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission (ZE) transportation (i.e., electrifying cars, buses, trains,

and trucks), which constitutes California's single largest source of GHG emissions. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place. Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include:

- Implementing Senate Bill (SB) 100, passed in 2021 (§ 116876 of the California Health and Safety Code) (achieve 100 percent clean electricity by 2045);
- Achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and
- Implementing the Advanced Clean Fleets regulation to deploy zero-emission vehicle (ZEV) buses and trucks.

Additional transportation policies in the CARB include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375, passed in 2018 (§ 1798.100 of the Civil Code). GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905, passed in 2022 (§ 39740 and § 39741 of the Health and Safety Code, and Public Resources Code § 71460). SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology (Kimley-Horn, 2024b).

As shown in Table 5, approximately 67 percent of the Project's GHG emissions are from energy and mobile sources which would be further reduced by the 2022 Scoping Plan measures described above. It should be noted that emissions from mobile sources would decline in the future due to Statewide measures for transitioning to lower emissions vehicles discussed above and low carbon fuels. The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan (Kimley-Horn, 2024b).

Simi Valley Climate Action Plan

The City adopted the Simi Valley Climate Action Plan (CAP) on June 4, 2012 as part of the City's General Plan update to reduce and encourage reductions in GHG emissions from all sectors in the City. The City has adopted a goal to reduce its community GHG emissions to 15 percent below its 2006 GHG emissions levels by 2020 as part of the City's Greenhouse Gas Reduction Plan within the CAP. The City compares and collects GHG emissions data for its municipal operations and tracks county-wide GHG emissions (Kimley-Horn, 2024b).

Table 7, Project Consistency with Simi Valley Climate Action Plan, summarizes the applicable strategies and project-level measures identified within the CAP that could apply to a commercial development. The measures are categorized by R1, R2, and R3. R1 measures are included to show how the anticipated reduction strategies implemented at the state level will result in a reduction of GHG emissions at the City level. R2 and R3 measures are implemented at the City level to reduce GHG emissions from the community as a whole. R2 measures can be quantified to show the value of the reduction from those measures. R3 measures are those measures that cannot be quantified at this time but are supportive of the R2 measures. Applicable R2 measures are listed in Table 7. It is expected that the Project would comply with these strategies and measures to reduce GHG emissions. Therefore, impacts related to consistency with the Simi Valley CAP would be less than significant.

Table 7. Project Consistency with Simi Valley Climate Action Plan

Strategy	Measure	Compliance
R2 Energy Reduction Measures		
R2-E5: Commercial Energy Efficiency Program	This measure involves the adoption of a voluntary incentive program that facilitates energy efficient design for all new non-residential buildings.	Consistent. The Project is required to comply with the Title 24 standards for Building Energy Efficiency that are in effect at the time of development.
R2-E6: Commercial/Industrial Retrofit Program	This measure would initiate a City program that facilitates the incorporation of energy reduction measures for non-residential buildings undergoing major renovations.	Consistent. The Project would not conflict with implementation of this measure. The Project would comply with the latest energy efficiency standards.
R2-E7: Water Use Reduction Initiative	Emissions associated with electricity consumption for water treatment and transportation are included with the energy reduction measures.	Consistent. The Project would comply with the CalGreen standards, which requires a 20 percent reduction in indoor water use.
R2 Solid Waste Measures		
R2-W1: City Diversion Program	This measure would implement a Citywide waste diversion goal of diverting 75% (current goal is 50%) of all waste from landfills by 2020. The following is a potential list of waste reduction measures that can be implemented for municipal operations and within the community on an individual development project level which will further strengthen existing waste reduction/diversion programs	Consistent. The Project would comply with current City mandatory construction and demolition waste recycling percentages. The Project would comply with solid waste diversion programs and include recycling storage areas as part of the Project.
R2-W2: Construction Diversion Program	Existing City Ordinance 1167 requires a minimum diversion of 75% of construction and demolition waste. This measure provides a 10% increase in diversion beyond General Plan Infrastructure Policy IU-5.7 (Recycling and Reuse of Construction Wastes) by increasing the diversion rate to 85%.	Consistent. The Project would comply with current City mandatory construction and demolition waste recycling percentages. The Project would comply with solid waste diversion programs and include recycling storage areas as part of the Project

Landscape Emissions Measures		
R3-L1: Expand City Tree Planting	Municipal, commercial and retail development should be encouraged to plant low emission trees, and exceed shading requirements by a minimum of 10%. In support of Natural Resource Policy NR-2.1 (Tree Preservation), and Land Use Policy LU-11.2 (Greenbelts), all future development must be encouraged to preserve native trees and vegetation to the furthest extent possible.	Consistent. Landscaping would be installed in all areas not devoted to buildings, parking, traffic and specific user requirements, in accordance with the City's landscape guidelines. The Project would exceed the minimum of 10 percent requirements for landscaping.
R2 Transportation Measures		
R2-T1: Anti-Idling Enforcement	This measure involves the adoption and enforcement of an Anti-Idling Ordinance for heavy-duty diesel trucks, including local delivery trucks and long-haul truck transport within the City.	Consistent. The Project would comply with current State laws that restrict diesel trucks from idling five minutes or less. Construction vehicles are also subject to this regulation.
R2-T2: Employment Based Trip and VMT Reduction	Implementation of this measure would enhance the current trip reduction ordinance which promotes commuter-choice programs, employer transportation management, guaranteed ride home programs, and commuter assistance and outreach type programs intended to reduce commuter vehicle miles traveled.	Consistent. The Project would reduce the number of average daily trips made by employees. The existing use is an office building that generates more employee trips than the proposed Project.
R2-T8: Expand Renewable Fuel/Low Emission Vehicle Use	New developments within the City will be required to provide the necessary facilities and infrastructure in all land use types to encourage the use of low or zero-emission vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations).	Consistent. This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict with implementation of this measure. Motor vehicles associated with construction and operation of the Project would utilize low carbon transportation fuels as required under this measure.

Source: City of Simi Valley, 2012b from GHG Assessment prepared by Kimley-Horn (Kimley-Horn, 2024b, provided as Appendix E).

3.11. Hazards and Hazardous Materials

HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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?	☐	☐	☒	☐
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste 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 §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
(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?	☐	☐	☐	☒
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

3.11.1. Environmental Impacts

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

LESS-THAN-SIGNIFICANT IMPACT. Demolition and construction activities under the proposed Project would involve the use of heavy equipment; construction equipment would utilize fuels, lubricants, and other chemicals such as cleaning solvents and paints. Construction activities could result in the release of these materials during routine storage, use, transport, or disposal. The Applicant and its contractor would be required to comply with all applicable federal, State, and local laws and regulations for the transport, storage, use, and disposal of hazardous materials and waste. Additionally, Project construction would comply with the standard SWPPP BMPs and principles related to hazardous materials and waste in compliance with the Construction General Permit. Proper handling, health and safety practices, and prompt cleanup of any spill or release would reduce any potential adverse effects to people or the environment. Therefore, impacts from Project construction activities would be less than significant, and no mitigation is required.

Operation and maintenance activities would primarily include the shipping and storing of goods that would require the use of equipment or vehicles utilizing fuel and oil. Although this could result in the release of these materials during routine transport, disposal, or use, it would be limited to small amounts

of oil that may leak from vehicles. The future operator would be required to comply with all applicable federal, State, and local laws and regulations that pertain to the transport, storage, use, and disposal of hazardous materials and waste. Additionally, prompt cleanup of any spill or release per SWPPP BMPs and principles would reduce any adverse effects related to spill or leaks of hazardous materials. Therefore, impacts from operation and maintenance activities would be less than significant, and no mitigation is required.

b. Would the project 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?

LESS-THAN-SIGNIFICANT IMPACT. As discussed in Section 3.11.1(a), the Project would comply with standard construction BMPs and applicable federal, State, and local laws and regulations relating to the transport, storage, use, and disposal of hazardous materials and waste. Operation and maintenance activities would not involve transport, use, or disposal of hazardous materials. As such, impacts related to potential releases or spills of hazardous materials during Project construction or operation and maintenance would be less than significant, and no mitigation is required.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

LESS THAN SIGNIFICANT IMPACT. There are no schools located within 0.25 miles of the proposed Project. The nearest school is the American Jewish University – Brandeis Bardin Campus, (1101 Peppertree Lane, Brandeis, CA), approximately 200 feet south of the Project site. The proposed Project would not require the use of hazardous materials or acutely hazardous materials, other than fuel and lubricants associated with operation of typical construction equipment and operation/maintenance equipment and vehicles. The construction contractor would be required to comply with all applicable federal, State, and local laws and regulations that pertain to the transport, storage, use, and disposal of hazardous materials and waste. Additionally, Project construction would comply with SWPPP BMPs in compliance with the Construction General Permit and City standard construction BMPs. Compliance with laws and regulations regarding the transport, storage, use, and disposal of hazardous materials and the Project BMPs would reduce the potential for adverse effects from hazardous materials with 0.25 miles of a school to less than significant. No mitigation is required.

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

LESS-THAN-SIGNIFICANT IMPACT. The Project site is not listed on the State Water Resources Control Board (SWRCB) GeoTracker database as a hazardous materials site (SWRCB, 2024b). Eight leaking underground storage tank (LUST) cleanup sites are located within one mile of the Project site with Case Closed statuses (SWRCB, 2024b). One cleanup site was identified by the Department of Toxic Substances Control (DTSC) Envirostor Database approximately 0.2 miles northeast on the Project site (DTSC, 2024). The voluntary agreement cleanup site in an aerospace manufacturing/maintenance facility has an active cleanup status as of January 20, 2023.

No other hazardous materials sites pursuant to Government Code §65962.5 are located at or near the Project site (SWRCB, 2024b; DTSC, 2024). Due to the lack of known hazardous materials sites at the proposed Project, it is unlikely that any known hazardous material sites would result in adverse effects during construction or operation of the proposed Project, therefore there is a less-than-significant impact for significant hazard to the public or environment from being located on a hazardous material site. No mitigation is required.

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?

NO IMPACT. The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The closest airport to the project site is the Van Nuys Airport, located approximately 14 miles east of the Project. Additionally, the Project site is not located within the vicinity of a private airstrip. Therefore, no impact would occur, and no mitigation is required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would not cause any changes that would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Simi Valley Emergency Plan Operations Plan identifies the Law Branch (primarily the Police Lieutenant) as the responsible entity for coordinating with Public Works Branch traffic engineering to determine evacuation routes depending on the type of emergency (City of Simi Valley, 2008). It is assumed that primary transportation routes, such as Tapo Canyon Road, Royal Avenue, Tapo Street, and East Los Angeles Avenue would be primary evacuation routes in the event of a wildfire emergency. The proposed Project would not involve any full or partial lane closures on these roads. Temporary lane closures may occur on Guardian Street but would not obstruct any of the primary roads that would likely be used as evacuation routes. Upon completion of construction, lane closures would not occur. Therefore, impacts would be less than significant, and no mitigation is required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

LESS-THAN-SIGNIFICANT IMPACT. Although the proposed Project is not located within a moderate, high, or very high fire hazard severity zone (FHSZ), it is adjacent to very high FHSZ to the east, south, and west (CAL FIRE, 2024). The Project is considered to be in the urban-wildlife interface and could be vulnerable to wildfire hazards and post-wildfire topographical instability. The Project site elevation gradually increases from southwest to northeast; the low elevation is along the western border at approximately 960 feet, and the high elevation is approximately 1,105 feet along its eastern boundary (South Environmental, 2023a). Project construction would occur within the existing developed footprint. Retaining walls would be constructed to provide soil support along adjacent slopes and would offer protection from potential post-fire downslope hazards. Additionally, the Project site does not fall within a landslide zone (Gorian & Associates, 2023). Therefore, the Project would have a less-than-significant impact on exposing people and structures to downslope flooding or landslides as a result of post-fire slope instability and drainage changes. No mitigation is required.

3.12. Hydrology and Water Quality

HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
(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;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

3.12.1. Environmental Impacts

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

LESS-THAN-SIGNIFICANT IMPACT. Project construction could generate water pollutants, including soil sediment and petroleum-based fuels or lubricants associated with construction equipment. Project construction would result in temporary demolition, excavation, and grading activities. If not properly addressed, stormwater pollution and erosion may occur, which could affect surface water quality during construction. Impacts to surface water quality during construction would be minimized through implementation of standard construction erosion control measures (e.g., silt fence, sediment traps, fiber rolls, and storm drain inlet protection measures) (USEPA, 2007) per the construction SWPPP, as well as the City of Simi Valley construction BMPs. Compliance with the construction SWPPP, Ventura County SQUIMP, and incorporation of BMPs would result in less-than-significant impacts to surface water quality. No groundwater is expected to be encountered during construction, as it was not encountered during the previous site investigation or during previous grading (Delane Engineering, 2024). Therefore, Project construction would not affect groundwater quality, and no mitigation is required.

During Project operations, drainage from the Project site would be treated before discharging to the on-site storage system. The Project would be designed to allow water to be treated through "Point Source and Treatment Train" treatment methods. The "treatment train" would include several methods for removing pollutants in successive order. The treatment train would begin with routine maintenance of

the site, such as manual removal of physical trash and debris. Storm flows would drain to grated inlets installed with pretreatment devices. A Contech Detention System (CDS) unit would be installed at the inlet to the detention basin to filter stormwater before it is detained and discharged from the site. These filters prevent trash from entering the storm drain system. Filtered storm flows would be discharged into the existing catch basin at the northwest corner of the Project site, ultimately discharging to Meier Canyon Creek via an existing outfall (Delane Engineering, 2024). Incorporation of stormwater pretreatment devices would result in less-than-significant impacts to surface water quality during operations, and no mitigation is required.

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

NO IMPACT. Per the Geotechnical Site Update report prepared for the proposed Project, groundwater was not encountered during the previous site investigation or during site rough grading for the existing development on site (Gorian & Associates, 2023). Construction of the proposed Project would not require dewatering of groundwater or use of any groundwater supplies.

Operation of the proposed Project would not withdraw groundwater or interfere with groundwater recharge. According to the Drainage Report, the Project is underlain by shallow bedrock; under existing conditions, the site is not conducive to groundwater recharge. Therefore, there would be no impacts relating to decreasing groundwater supplies or interfering with groundwater recharge, and no mitigation is required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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

LESS-THAN-SIGNIFICANT IMPACT. Project construction activities would include earthwork such as excavation and grading, potentially exposing soil to erosion or siltation. Construction activities would comply with the SWPPP in accordance with the Construction General Permit, as required under the NPDES General Permit for Stormwater Discharges Associate with Construction and Land Disturbance Activities (SWRCB, 2022). Typical SWPPP construction BMPs may include erosion and sedimentation control measures, such as silt fencing, sediment traps, fiber rolls, and storm drain inlet protection measures (USEPA, 2007). These BMPs would ensure that erosion and siltation impacts during construction would be less than significant.

Although the Project would construct a new warehouse building and re-pave the site, operational conditions would be similar to existing conditions, as the site would remain paved and developed, and site drainage patterns would not substantially change. Exposed soil from excavation would be restored with asphalt, and stormwater would continue to be diverted to Meier Canyon Creek via the existing outfall. The site topography would be restored similar to existing conditions, and substantial erosion or siltation would not occur. Therefore, impacts would be less than significant, and no mitigation is required.

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

LESS-THAN-SIGNIFICANT IMPACT. Per the Preliminary Drainage Report, the existing site was assigned a 65 percent impervious value, and the proposed Project was assigned a 71 percent impervious value, representing a six percent increase in impervious surfaces (Delane Engineering, 2024). Under existing conditions, the majority of the existing condition drainage flows northeasterly towards Guardian Street (Delane Engineering, 2024). During Project operations, runoff would be collected by new on-site inlets

and conveyed offsite to Meier Canyon Creek, utilizing an existing outfall located along the northwest boundary of the Project site (Delane Engineering, 2024). Once constructed, conditions would be similar to existing conditions, as the site would remain paved and developed, and site drainage patterns would not substantially change. Project storm drains, gutters, and inlets would be designed to adequately convey a 100-year storm off site towards the northwest corner of Peppertree Lane and Guardian Street (Delane Engineering, 2024). Therefore, surface runoff rates would remain similar to existing conditions, and impacts would be less than significant, and no mitigation is required.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would slightly increase the amount of impervious surface by approximately six percent (Delane Engineering, 2024). Construction ground disturbance activities such as excavation, and the presence of construction equipment may temporarily contribute to polluted runoff. Implementation of SWPPP BMPs as required by the Construction General Permit would reduce potential runoff pollution during construction.

During Project operations, runoff would be collected by new on-site inlets and conveyed offsite to Meier Canyon Creek, utilizing an existing outfall located along the northwest corner of the Project site (Delane Engineering, 2024). Once constructed, the site would include new stormwater drainage systems, inlets, and gutters to adequately convey the 100-year storm off site towards the northwest corner of Peppertree Lane and Guardian Street (Delane Engineering, 2024). Pretreatment devices would be installed in every inlet. A Contech Detention System (CDS) unit would be installed at the inlet to the detention basin to provide treatment for stormwater flows from small storm events before they are detained and discharged from the site. As such, the proposed Project would increase the capacity of the site's stormwater drainage system to prevent flooding, and include pretreatment devices to capture pollutants, sediment, and trash before flows are discharged offsite. Therefore, the Project would install stormwater drainage systems that would adequately convey runoff and would not provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation is required.

iv. Or impede or redirect flood flows?

NO IMPACT. The Federal Emergency Management Agency's (FEMA) National Flood Insurance Program Flood Insurance Rate Map shows the Project site primarily within an area designated as Zone X, or an area of minimal flood hazard (Delane Engineering, 2024). Because the Project would not be constructed within a mapped flood hazard area, and would result in development similar to existing conditions, it would not impede or redirect flood flows. No impact would occur, and no mitigation is required.

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

NO IMPACT. There are no large bodies of water, such as lakes or oceans, near the Project site that could cause a seiche or tsunami. The closest body of water to the Project site is Meier Canyon Creek, an intermittent stream that is located approximately 450 feet west of the Project site, which has no potential to cause a seiche or tsunami. As discussed in Section 3.12.1(c)(iv), the Project site is located within FEMA Flood Insurance Rate Map Zone X, an area of minimal flood hazard (Delane Engineering, 2024). Therefore, impacts relating to the risk of pollutants in a flood, tsunami, or seiche zone would not occur, and no mitigation is required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project is required to comply with the Clean Water Act, Porter-Cologne Water Quality Control Act, and Ventura Countywide Stormwater Quality Management Program. The Applicant would obtain a Construction General Permit under the NPDES System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities and Waste Discharge Requirements for Stormwater and Non-Stormwater Discharges (Permit No. CAS004004, Order No. R4-2021-0105) (RWQCB, 2021; SWRCB 2010). Construction and post-construction SWPPP BMPs would be implemented to meet the requirements of these permits. Therefore, this impact would be less than significant, and no mitigation is required.

3.13. Land Use and Planning

LAND USE PLANNING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Physically divide 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?	☐	☐	☐	☒

3.13.1. Environmental Impacts

a. Would the project physically divide an established community?

NO IMPACT. The physical division of an established community typically refers to the construction of a linear features, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, that would impair mobility within an existing community or between a community and outlying area. The proposed Project would redevelop the existing site for a new single warehouse facility. No residential communities exist within the Project boundaries. Surrounding local roads would remain open to facilitate continuous mobility. As such, the Project would not create a barrier that could divide the surrounding community. Therefore, no impact would occur, and no mitigation is required.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

NO IMPACT. The proposed Project would be subject to the policies and ordinances of the City of Simi Valley General Plan and the Brandeis-Bardin Institute Specific Area Plan. According to the General Plan and the Specific Plan, the Project site's zoning and land use designations are Business Park (City of Simi Valley, 2011; 2023; 2024a). Construction and operation of the proposed Project would not conflict with the designated zoning or land use, as they would be consistent with the uses permitted and all requirements under the Business Park zone and land use. As noted in Section 2.7, Anticipated Permits and Approvals, coordination with several regulatory local and regional agencies would be required to allow for construction, operation, and maintenance of the proposed Project. As such, the proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, no impact would occur, and no mitigation is required.

3.14. Mineral Resources

MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

3.14.1. Environmental Impacts

a. Would the project 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?

NO IMPACT. The Ventura County General Plan's Resource Protection Map indicates that no designated Mineral Resource Areas are located in proximity to the Project site (Ventura County, 2010). The EIR prepared for the City's General Plan indicates that the Project site is within Mineral Resource Zone (MRZ)-1, defined as an area where adequate information indicates that no significant mineral deposits are present (City of Simi Valley, 2012a). In addition, according to the Department of Conservation (DOC) Geologic Energy Management Division, no oil and gas wells or fields are located within the Project site boundary. The nearest oil or gas wells are approximately 0.2 miles east of the Project site (DOC, 2024b). Construction activities would not prevent access to the two neighboring oil or gas wells or affect existing activities because the wells are located offsite and the statuses are indicated as plugged and idle, respectively. Therefore, the proposed Project would not prevent future oil extraction or conflict with existing oil extraction activities. 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. Therefore, the proposed Project would have no impact on a known mineral resource, and no mitigation is required.

b. Would the project 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?

NO IMPACT. As described in Section 3.14.1(a), the Project site is not located within an area indicative of significant mineral deposits or an area that contains active oil and gas wells. The proposed Project would not conflict with existing oil extraction land use or prevent future oil extraction. As such, the proposed Project would not 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. Therefore, no impacts would occur, and no mitigation is required.

3.15. Noise

NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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?	☐	☐	☒	☐
(b) 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?	☐	☐	☐	☒

3.15.1. Setting

General Information on Noise

This section introduces general information on noise and provides data on the existing noise settings and detailed analysis on Project noise impacts, provided in detail in the Acoustical Assessment for 4100 Guardian Street Warehouse Project, prepared by Kimley-Horn an Associates, Inc. This report is incorporated by reference and provided in Appendix F:

> Kimley-Horn. 2024c. *Acoustical Assessment, 4100 Guardian Street Warehouse Project, City of Simi Valley, California*. February.

A brief background on the fundamentals of environmental acoustics is helpful in understanding how humans perceive various sound levels. Although extremely loud noises can cause temporary or permanent damage, the primary environmental impact of noise is annoyance. The objectionable characteristic of noise often refers to its loudness. Loudness represents the intensity of the sound wave, or the amplitude of the sound wave height measured in decibels (dB). Decibels are calculated on a logarithmic scale; thus, a 10-dB increase represents a 10-fold increase in acoustic energy or intensity, while a 20 dB increase represents a 100-fold increase in intensity. Decibels are the preferred measurement of environmental sound because of the direct relationship between a sound's intensity and the subjective "noisiness" of it. The A-weighted decibel system (dBA) is a convenient sound measurement technique that weights selected frequencies based on how well humans can perceive them.

Noise Effects on Humans. The range of human hearing spans from the minimal threshold of hearing (approximately 3 dBA) to that level of noise that is past the threshold of pain (approximately 120 dBA). In general, human sound perception is such that a change in sound level of 3 dB is just barely noticeable, while a change of 5 dB is clearly noticeable. A change of 10 dB is perceived as a doubling (or halving) of sound level. Noise levels are generally considered low when they are below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss if exposure is sustained.

Ambient environmental noise levels can be characterized by several different descriptors. The energy equivalent level (Leq) describes the average or mean noise level over a specified period of time. Leq

provides a useful measure of the impact of fluctuating noise levels on sensitive receptors over a period of time. Other descriptors of noise incorporate a weighting system that accounts for human's susceptibility to noise irritations at night. Community Noise Equivalent Level (CNEL) is a measure of cumulative noise exposure over a 24-hour period, where a 5 dB penalty is added to evening hours (7:00 p.m. to 10:00 p.m.) and a 10 dB penalty is added to night hours (10:00 p.m. to 7:00 a.m.). Day/Night Average Noise Level (Ldn) is essentially the same as CNEL, with the exception that the evening penalty is dropped.

Noise Propagation. In air, sound from a point source radiates according to inverse square laws either spherically or hemispherically from the source, depending upon whether the noise source is near a reflecting surface such as the ground. Consequently, sound will decrease at a rate of 6 dB per doubling of distance from a point source. Additional decreases will occur due to sound absorption in the air, interaction with the ground, and shielding by intervening obstacles such as terrain (hills), wall, or buildings. A noise source which is relatively long, such as a constant stream of traffic, is called a line source, and the sound spreads cylindrically, at a rate of 3 dB per doubling of distance.

General Information on Vibration

Vibration from objects in contact with the ground will propagate energy through the ground and can be perceptible by humans and animals in the form of perceptible movement or in the form of rumbling sound caused by the vibration of room surfaces. The latter is described as ground-borne noise. High levels of vibration can result in architectural damage and structural damage depending upon the amplitude of the vibration and the fragileness of the building or structure.

Vibration is an oscillatory motion through a solid medium, in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. When assessing damage potential, vibration is often measured and reported in terms of peak particle velocity (PPV). For evaluating human response, the accepted manner to measure and report vibration is in terms of the root mean square amplitude. Like noise, vibration is normally expressed in terms of decibels (VdB) with a reference velocity of $1x10^{-6}$ inches per second (in/sec).

Noise Environment in the Project Area

Simi Valley is impacted by various noise sources. Mobile sources of noise, especially cars, trucks, and trains are the most common and significant sources of noise. Other noise sources are the various land uses (i.e., residential, commercial, institutional, and recreational and parks activities) throughout the City that generate stationary-source noise (Kimley-Horn, 2024c).

The primary mobile noise source in the Project area is from vehicle traffic along Guardian Street and Tapo Canyon Road. According to the National Transportation Noise Map, the Project site is located within the 45-50 dBA Leq noise contour for Guardian Street (Kimley-Horn, 2024c).

The primary stationary noise source in the Project area is from commercial uses to the north and the existing on-site office building. Typical stationary noise sources from these uses include mechanical equipment (use of heating, ventilation, and air conditioning units), parking lot activities (cars parking, opening and closing doors, truck movements, and loading activities), conversations, and radio and music. The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise (Kimley-Horn, 2024c).

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses that are not subject to

impacts such as sleep disturbance. Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Sensitive land uses nearest to the Project include single-family residences, located approximately 965 feet to the north, and American Jewish University – Brandeis Bardin Campus, located approximately 200 feet to the south (Kimley-Horn, 2024c).

Noise Measurements

The Applicant's consultant, Kimley-Horn, conducted five short-term (10-minute) measurements on August 14, 2023. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project site. Refer to Appendix F for additional details on noise measurements. The average noise levels and sources of noise measured at each location are listed in Table 8 and locations shown in Figure 3.

Table 8. Existing Noise Level Measurements

Site	Location	Date	Time	Duration	Leq (dBA) 1
ST-1	Near the southeast corner of Tapo Canyon Road and Guardian Street.	8/14	9:24 a.m. – 9:34 a.m.	10 Minutes	60.2
ST-2	End of the residential cul-de-sac on Hi Drive, adjacent to the bike path.	8/14	9:58 a.m. – 10:08 a.m.	10 Minutes	51.4
ST-3	South corner of Lark Street and Hi Drive.	8/14	10:12 a.m. – 10:22 a.m.	10 Minutes	47.0
ST-4	Southwest corner of Ish Drive and Tapo Street.	8/14	10:27 a.m. – 10:37 a.m.	10 Minutes	57.0
ST-5	Near the hill south of the existing complex on the Project site.	8/14	9:38 a.m. – 9:48 a.m.	10 Minutes	45.3

Noise measurements were taken by Kimley-Horn and Associates on August 14, 2023.
Source: Kimley-Horn, 2024c, provided as Appendix F.

Figure 3. Noise Measurement Locations

Source: Kimley-Horn, 2024c.

3.15.2. Environmental Impacts

a. Would the project result in 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?

LESS-THAN-SIGNIFICANT IMPACT.

Construction

During construction, exterior noise levels could affect sensitive receptors surrounding the construction site, as discussed in *Noise Environment in the Project Area*, above. Project construction would occur within an area bounded by residential and commercial business park uses to the north, commercial uses to the east, and industrial uses to the west. The nearest sensitive receptors are the residents at American Jewish University – Brandeis Bardin Campus located approximately 200 feet to the south of the Project site.

Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Such activities could require concrete saws, excavators, and dozers during demolition; dozers and tractors during site preparation; excavators, graders, dozers, and tractors during grading; cranes, forklifts, generators, tractors, and welders during building construction; pavers, rollers, mixers, and paving equipment during paving; and air compressors during architectural coating.

Typical noise levels associated with individual construction equipment are listed in Table 9. As indicated in Table 9, sensitive receptors can be exposed to high noise levels when located near active construction equipment.

Simi Valley Municipal Code §5-16.02(i) (Construction and repair of buildings) exempts noise sources associated with construction activities from the City's established noise standards as long as the activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. While the City establishes limits to the hours during which construction activity may take place, it does not identify specific noise level limits for construction noise levels. The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. However, this analysis uses the Federal Transportation Authority's (FTA) thresholds of 80 dBA (residential), 85 dBA (commercial), and 90 dBA (industrial) to evaluate construction noise at adjacent uses.

Table 9. Typical Construction Noise Levels

Equipment	Typical Noise Level (dBA) at 50 feet from Source	Typical Noise Level (dBA) at 100 feet from Source[1]
Air Compressor	80	74
Backhoe	80	74
Compactor	82	76
Concrete Mixer	85	79
Concrete Pump	82	76
Concrete Vibrator	76	70
Crane, Derrick[2]	88	82
Crane, Mobile	83	77
Dozer	85	79
Generator	82	76
Grader	85	79
Impact Wrench	85	79
Jack Hammer	88	82

Loader	80	74
Paver	85	79
Pile-driver (Impact) [2]	101	95
Pile-driver (Sonic) [2]	95	89
Pneumatic Tool	85	79
Pump	77	71
Roller	85	79
Saw	76	70
Scraper	85	79
Shovel	82	76
Truck	84	78

1- Calculated using the inverse square law formula for sound attenuation: dBA2 = dBA1+20Log(d1/d2)
Where: dBA2 = estimated noise level at receptor; dBA1 = reference noise level; d1 = reference distance; d2 = receptor location distance

2- Equipment not anticipated for Project construction.
Source: Kimley-Horn, 2024c.

The Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) was used to calculate the worst-case construction noise levels at nearby sensitive receptors surrounding the Project site during construction. The modeled receptor locations represent the closest existing receiving land uses to Project construction activities. Noise levels at other sensitive receptors surrounding the Project site would be located further away and would experience lower construction noise levels than the closest receptors modeled. The noise levels calculated in Table 10, Project Construction Noise Levels, show the exterior construction noise without accounting for attenuation from existing physical barriers, which have been estimated using RCNM. The nearest noise-sensitive receptors are the residents at the American Jewish University – Brandeis Bardin Campus located approximately 200 feet south of the Project boundary and 546 feet from the center of construction activity. Following FTA methodology, all equipment is assumed to operate at the center of the Project site because equipment would operate throughout the site and not a fixed location for extended periods of time. These assumptions represent a worst-case noise scenario as construction activities would routinely be spread throughout the construction site further away from noise sensitive receptors.

Table 10. Project Construction Noise Levels

Construction Phase	Receptor Location			Worst Case Modeled Exterior Noise Level (dBA Leq)	Noise Threshold (dBA Leq)	Exceeded?
	Land Use	Direction	Distance (feet)			
Demolition	Residential	South	546	45.3	80	No
	Office Commercial	North	444	67.5	85	No
	Residential	North	1,376	57.7	80	No
	Industrial	West	658	64.1	90	No
Site Preparation	Residential	South	546	66.9	80	No
	Office Commercial	North	444	68.7	85	No
	Residential	North	1,376	58.8	80	No
	Industrial	West	658	65.2	90	No
Grading	Residential	South	546	66.5	80	No
	Office Commercial	North	444	68.3	85	No
	Residential	North	1,376	58.5	80	No
	Industrial	West	658	64.9	90	No

Building Construction	Residential	South	546	67.6	80	No
	Office Commercial	North	444	69.4	85	No
	Residential	North	1,376	59.6	80	No
	Industrial	West	658	66.0	90	No
Paving	Residential	South	546	65.8	80	No
	Office Commercial	North	444	67.6	85	No
	Residential	North	1,376	57.7	80	No
	Industrial	West	658	64.1	90	No
Architectural Coating	Residential	South	546	53.0	80	No
	Office Commercial	North	444	54.8	85	No
	Residential	North	1,376	44.9	80	No
	Industrial	West	658	51.3	90	No

Source: Kimley-Horn, 2024c.

As depicted in Table 10, construction noise levels would range between 44.9 dBA and 69.4 dBA at the nearest properties surrounding the Project site and would not exceed the FTA's construction noise thresholds for residential, commercial, and/or industrial uses. Additionally, compliance with Simi Valley Municipal Code §5-16.02 would minimize potential impacts from construction noise, as construction would be limited to the hours between 8:00 a.m. and 5:00 p.m. Because Project construction noise levels would not exceed any applicable standards and would be required to comply with the City's allowable construction hours, construction noise impacts would be less than significant.

The proposed Project operations would create new sources of noise in the Project vicinity. The major noise sources associated with the Project are anticipated to including the following:

- Mechanical equipment (i.e., trash compactors, air conditioners, etc.);
- Slow moving trucks on the Project site, approaching and leaving the loading areas;
- Activities at the loading areas (i.e., maneuvering and idling trucks, equipment noise);
- Parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by); and
- Off-Site traffic noise.

Mechanical Equipment

Potential stationary noise sources related to long-term operation of the Project site would include mechanical equipment. Mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment) typically generates noise levels of approximately 52 dBA at 50 feet. On-site mechanical equipment would be positioned on the rooftop of the proposed warehouse building. To ensure a conservative analysis, it is assumed that mechanical equipment would be located at the nearest building footprint, approximately 285 feet from the nearest sensitive receptors to the south. At this distance, mechanical equipment noise levels would attenuate to approximately 33.9 dBA, which is below the City's noise standard of 63 dBA for residential uses. Therefore, the proposed Project operations would result in a less-than-significant impact related to mechanical equipment noise levels.

Truck and Loading Dock Noise

Truck Loading Activities

During loading and unloading activities, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting braking activities; backing up toward the docks; dropping down the dock ramps; and maneuvering away from the docks. Loading or unloading activities would occur on the eastern façade of the warehouse building. Typically, heavy truck operations generate a noise level of 70 dBA at a distance of 50 feet. The closest residences would be located approximately 575 feet from the truck loading area. Based on distance attenuation and the sound reduction from the intervening

warehouse building, noise levels from truck loading operations would be approximately 38.8 dBA at the nearest residences to the south, which is below the City's noise standards of 63 dBA for residential uses. It should also be noted that the loading dock doors would be surrounded with protective aprons, gaskets, or similar improvements that, when a trailer is docked, would serve as a noise barrier between the interior warehouse activities and the exterior loading area. This would attenuate noise emanating from interior loading activities to negligible noise levels outside of the warehouse building, and as such, interior loading and associated activities would comply with SVMC §5-16.02 during all hours of the day.

Cargo Forklift Operations

Cargo forklifts could be used at the outdoor loading dock area during daytime hours for truck loading/unloading activities. Cargo forklifts generate noise levels of approximately 85 dBA at 3 feet. The closest residences would be located approximately 575 feet from where cargo forklifts would operate at the Project site. Based on distance attenuation and the sound reduction from the intervening warehouse building, noise levels from cargo forklift operations would be approximately 29.4 dBA and would not exceed the City's noise standard of 63 dBA for residential uses.

Truck Back-Up Alarms

Medium and heavy-duty trucks reversing into loading docks would produce noise from back-up alarms (also known as back-up beepers). Back-up beepers produce a typical volume of 97 dBA at one meter from the source. The closest residences would be located approximately 575 feet from the truck loading area. Based on distance attenuation and the sound reduction from the intervening warehouse building, the noise level from back-up beepers would be approximately 42.1 dBA, which is below the City's noise standards of 63 dBA for residential uses. Further, it is noted that back-up beeper noise is short in duration and would occur intermittently throughout the day/night. Therefore, back-up beeper noise would not exceed the City's applicable noise standards and would comply with the provisions of SVMC §5-16.02.

Parking Noise

The proposed Project would provide a total of 129 parking stalls. Parking stalls would surround the proposed warehouse to the north, south, and west. Based on warehousing trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual, the Project would generate up to 35 passenger car equivalent (PCE) trips per hour. Please refer to Appendix F for a detailed calculation of a conservative quantitative estimate of the noise levels generated by vehicles in the parking lot. Conservatively assuming that all vehicles would park at a location nearest to sensitive receptors rather than dispersed throughout all available parking and based on distance attenuation and the sound reduction from intervening buildings and walls/structures, parking lot noise at the nearest sensitive receptor would be 26.7 dBA, which is below the City's noise standard of 63 dBA for residential uses. Parking lot noise would be consistent with the existing noise in the vicinity and would be partially masked by background noise from traffic along area roadways. Therefore, noise impacts from parking lots would be less than significant, and no mitigation is required.

Composite Operational Noise

For the purposes of this analysis, a 3 dBA increase in operational noise levels over existing ambient noise levels at a noise-sensitive use is conservatively used as the significance criterion to determine Project impacts.

An evaluation of the combined noise levels from the Project's various operational noise sources (i.e., composite noise level) was conducted to conservatively determine the potential maximum Project-related noise level increase that may occur at the nearest noise-sensitive receptors. Table 11 details the on-site noise levels from the Project site at the nearest residential uses. It should be noted that these are

conservative noise level estimates, as it was assumed all equipment and operational activity at the Project site would occur in a constant, simultaneous manner. In reality, these noise sources would occur intermittently throughout the day (except for the HVAC, which may operate in a steady-state manner).

Table 11. On-Site Composite Noise Levels

Receiving Land Use	Maximum On-Site Noise Levels by Source					Combined Noise Level at Receptor (dBA Leq)	Ambient Noise Level (dBA Leq)	Ambient + Combined Project Noise (dBA Leq)[1]	Incremental Increase over Ambient (dBA Leq)
	Mechanical Equipment	Truck and Loading	Forklift	Backup Alarms	Parking				
American Jewish University Brandeis Bardin Campus Residents (south)	33.9	38.8	29.4	42.1	26.7	44.4	45.3	47.9	2.6

Source: Kimley-Horn, 2024c.

Notes:

1. Noise levels for all stationary Project sources (mechanical equipment, truck and loading, forklift, backup alarms, and parking) were logarithmically added together and conservatively assumed to operate in a simultaneous, constant manner.

As shown in Table 11, the Project would generate a combined noise level of approximately 44.4 dBA at the nearest sensitive receptors to the south of the Project site. When added to the measured ambient noise levels, Project noise levels at the nearest sensitive receptors would be approximately 47.9 dBA and would result in a maximum 2.6 dBA increase compared to existing conditions. Thus, composite Project operational noise levels would be below the City's noise standard of 63 dBA for residential uses and would not exceed the barely perceptible noise increase criterion of 3 dBA. On-site operational noise levels from the Project would be less than significant, and no mitigation is required.

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments. In general, a traffic noise increase of less than 3 dBA is barely perceptible to people, while a 5-dBA increase is readily noticeable. Generally, traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to increase by 3 dBA. Therefore, permanent increases in ambient noise levels of less than 3 dBA would be less than significant.

According to the Simi Valley General Plan EIR, traffic volumes along Tapo Canyon Road ranges from 2,700 to 30,000 average daily vehicles per day. Based on trip generation data from the ITE Trip Generation Manual, the warehouse use proposed with the Project would result in fewer daily vehicle trips (non-PCE) than the existing use of the site as an office building and thus would not generate a noticeable increase in traffic noise levels. Any potential traffic noise increases along Tapo Canyon Road and other nearby streets would not be noticeable due to the existing traffic noise in the area. Traffic noise effects would not create a noticeable change in traffic noise levels in the area and impacts be less than significant, and no mitigation is required.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels generation of excessive groundborne vibration or groundborne noise levels?

LESS-THAN-SIGNIFICANT IMPACT.

Construction Vibration

Construction on the Project site would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The FTA has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage.

The nearest off-site structure (commercial building) is located approximately 80 feet to the north, and the nearest sensitive receptor is located approximately 200 feet south of the Project site. Table 12, Typical Construction Equipment Vibration Levels, lists vibration levels at 25 feet and 80 feet for typical construction equipment. Ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in Table 12, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.210 in/sec PPV at 25 feet from the source of activity.

Table 12. Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 80 Feet (in/sec)[1]
Vibratory Roller	0.210	0.037
Large Bulldozer/Caisson Drilling	0.089	0.016
Loaded Trucks	0.076	0.013
Jackhammer	0.035	0.006
Small Bulldozer/Tractors	0.003	0.001

1- Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018; D = the distance from the equipment to the receiver.

Source: Kimley-Horn, 2024c.

As noted above, the nearest structure to the Project construction site is approximately 80 feet away. Table 12 shows that at 80 feet, the vibration velocities from construction equipment would be a maximum of 0.037 in/sec PPV, which is below the FTA's 0.20 in/sec PPV threshold for building damage and below the 0.4 in/sec PPV annoyance threshold. Construction activities would occur throughout the Project site and would not be concentrated at the point closest to the nearest structure. Therefore, vibration impacts associated with Project construction would be less than significant, and no mitigation is required.

Operational Vibration

Project operations would include truck movement activity at the Project site. These movements would generally be low-speed (i.e., less than 15 miles per hour) and would occur over new, smooth surfaces. Caltrans notes that the highest traffic-generated vibrations are along freeways and state routes. Since the Project's truck movements would be at low speed (not at freeway speeds) and would be over smooth surfaces (not under poor roadway conditions), Project-related vibration associated with truck activity would not result in excessive ground-borne vibrations; no passenger vehicle-generated vibration impacts would occur. In addition, there are no sources of substantial ground-borne vibration associated with the Project, such as rail or subways. The Project's operational vibration impacts would be less than significant, and no mitigation is required.

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?

NO IMPACT. The nearest airport to the Project site is the Van Nuys Airport located approximately 14 miles to the east. Thus, the Project is not within two miles of a public airport or within an airport land use plan. Additionally, there are no private airstrips located within the Project vicinity. Therefore, the Project would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels, and no impact would occur. No mitigation is required.

3.16. Population and Housing

POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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)?	☐	☐	☐	☒
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.16.1. Environmental Impacts

a. Would the project 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)?

NO IMPACT. The proposed Project would demolish the existing office building and construct a new warehouse facility. The Project's construction period is anticipated to last approximately 18 months and would require up to 70 construction personnel during peak construction activities. While the future tenant of the proposed building is to be determined, the number of operational employees is estimated to be 180. Ventura County has a considerable construction workforce of nearly 25,000 employees (U.S. Census Bureau, 2022). Because the proposed Project is located within a well-established, heavily populated urban community, existing housing stock and established infrastructure is sufficient. As such, the proposed Project would not indirectly induce substantial unplanned population growth. Therefore, no impacts on population and housing would occur, and no mitigation is required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

NO IMPACT. The proposed Project would not remove existing housing from the available supply, and displacement would not occur which could otherwise require the construction of replacement housing. As such, the proposed Project would not displace people or require the construction of replacement housing. Therefore, no impact would occur, and mitigation is not required.

3.17. Public Services

PUBLIC SERVICES 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:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Fire protection?	☐	☐	☒	☐
(b) Police protection?	☐	☐	☐	☒
(c) Schools?	☐	☐	☐	☒
(d) Parks?	☐	☐	☐	☒
(e) Other public facilities?	☐	☐	☐	☒

3.17.1. Environmental Impacts

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:

a. Fire protection?

LESS-THAN-SIGNIFICANT IMPACT. Construction and operation of the proposed Project would not affect the area's population, and therefore, the proposed Project would not create a need for new or altered fire protection facilities. Ventura County Fire Department (VCFD) Station #41 is located at 1910 Church Street and is approximately 1.25 miles northwest from the Project site (VCFD, 2024). Although temporary construction access and partial lane closures along Guardian Street could adversely affect emergency service and response times during Project construction, notification would be provided to emergency service providers to ensure that emergency response is not impaired. Alternative public routes such as Tapo Canyon Road and Tapo Street would be available. Peppertree Lane, a private road, would remain open for individuals accessing the American Jewish University – Brandeis Bardin Campus located south of the Project site. While construction vehicles and equipment would be accessing the Project site during construction, no road closures or long-term interruptions would occur such that emergency access to and from the American Jewish University – Brandeis Bardin Campus would be rendered inadequate.. Once construction is completed, any potential impacts to emergency service response times would cease. The proposed Project would be designed in accordance with all applicable fire safety codes, and the Applicant would be required to submit a Fire Protection Plan as part of the formal planning application review. The Fire Protection Plan would be prepared to determine the acceptability of fire protection and life safety measures at the property in compliance with the State Minimum Fire Safe Regulations and VCFD Ordinance and Standards. As such, the proposed Project's construction and operation would not require the need for new or physically altered governmental facilities to the Project area. Therefore, the proposed Project would have a less-than-significant impact on fire protection services, and no mitigation is required.

b. Police Protection?

NO IMPACT. As discussed in Section 3.16.1(a), the proposed Project would not induce any population growth that would require expanded police protection. Thus, no new or altered police facilities would be needed as a result of the proposed Project. Therefore, operation and construction of the proposed Project would have no impact on police or sheriff protection services, and no mitigation is required.

c. Schools?

NO IMPACT. The need for new schools is generally associated with an increase in the school-aged population or a decrease in the accessibility and availability of existing schools. Residential development would not occur under the proposed Project, and the school-aged population would not increase. As such, construction and operation of the proposed Project would not affect the operation of existing school facilities, and new or physically altered facilities would not be needed. Therefore, the no impacts would occur, and no mitigation is required.

d. Parks?

NO IMPACT. The proposed Project would not develop new parks or reduce existing park facilities. Furthermore, the Project site would be confined to the Project boundaries and would not induce population growth that would increase demand for parks beyond the existing facilities. Therefore, no impacts to existing parks or need for new parks would occur, and no mitigation is required.

e. Other Public Facilities?

NO IMPACT. As previously discussed in Section 3.17.1(a), the proposed Project does not include development that would induce substantial unplanned population growth that would increase the use of libraries, community centers, hospitals, or other public facilities. As such, a substantial increase in use of these public facilities would not occur. Therefore, no impacts on other public facilities would occur, and no mitigation is required.

3.18. Recreation

RECREATION	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

3.18.1. Environmental Impacts

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?

NO IMPACT. Demand for neighborhood and regional parks or other recreational facilities is generally associated with an increase in the number of permanent residents in the area. No residential facilities or features would be developed under the proposed Project that would result in an increase in the number of residents at existing recreational facilities. As such, increased use of existing parks or other recreational facilities would not occur. Therefore, no impacts would occur, and no mitigation is required.

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?

NO IMPACT. As discussed in Section 3.16.1(a), Population and Housing, the proposed Project would not impact the area's population, and thus no increase in the demand for recreational facilities would occur. Additionally, operation and maintenance would not require the construction or expansion of recreational facilities. Therefore, no impacts on recreational facilities would occur, and no mitigation is required.

3.19. Transportation

TRANSPORTATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
(b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
(d) Result in inadequate emergency access?	☐	☐	☒	☐

3.19.1. Environmental Impacts

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

LESS-THAN-SIGNIFICANT IMPACT. The City of Simi Valley General Plan Mobility and Infrastructure element establishes goals and policies including the following: supporting a safe and efficient transportation system, providing regional transportation facilities, establishing safe roadway designs and level of service, providing traffic controls, providing sufficient parking, and encouraging bicycle travel and public transit (City of Simi Valley, 2012a). The proposed Project's transportation components would be constructed in compliance with City standards, including required fire access lanes, driveway apron, bicycle racks, and spaces for regular, electric, and ADA vehicle parking. The Project would accommodate passenger vehicles, trucks, and bicyclists and would not alter or construct new roadways or other features that would conflict with the City's circulation system. Impacts would be less than significant, and no mitigation is required.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

LESS-THAN-SIGNIFICANT IMPACT. CEQA Guidelines § 15064.3 subdivision (b) provides criteria for analyzing transportation impacts. The guidelines state that a significant impact may occur if vehicle miles traveled (VMT) exceed an applicable threshold of significance. Per the Trip Generation Memorandum prepared by Kimley-Horn for the proposed Project (Appendix G), the existing site is estimated to generate approximately 1,447 passenger car trips on a daily basis with 203 passenger car trips in the morning peak hour and 193 passenger car trips in the evening peak hour. Project operations trips are estimated to generate 404 passenger car equivalent (PCE) trips, with 32 PCE trips in the morning peak hour and 35 PCE trips in the evening peak hour (Kimley-Horn, 2024d).

Per the City of Simi Valley Guidelines for the Preparation of Traffic Impact Reports, a traffic impact report is required if a project's trip generation exceeds the existing site trip generation by at least 110 daily trips. After subtracting the trip generation of the existing office building, the Project is estimated to generate a net of -1,043 daily trips, with -171 morning peak hour trips and -158 evening peak hour trips (Kimley-Horn, 2024d). Based on the trip generation provided in the Trip Generation Memorandum, the proposed Project is anticipated to fall below the defined threshold, and therefore the Project would not require a traffic impact report. As such, the impact is considered less than significant, and no mitigation is required.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project does not include any modifications to existing roads or construction of new roads that may have hazardous designs. The proposed Project would include reconstruction of the existing driveway to accommodate passenger vehicles and trucks per City standards. No new intersections or changed traffic conditions would occur as a result of the proposed Project. The proposed Project does not include incompatible uses, as warehouse operations are consistent with the permitted uses under the Business Park zone and land use. Impacts would be less than significant, and no mitigation is required.

d. Would the project result in inadequate emergency access?

LESS-THAN-SIGNIFICANT IMPACT. During construction, vehicles would travel on local roads including Tapo Canyon Road and Guardian Street to access the Project site to transport materials, construction equipment, and workers. Construction equipment and vehicles may impede emergency access on these local roads. However, this effect would be temporary and intermittent, as construction activities would be limited to the hours of 8:00 a.m. and 5:00 p.m. and last approximately 18 months. Additionally, notification would be provided to emergency service providers to ensure that emergency response is not impaired. Alternative public routes such as Tapo Canyon Road and Tapo Street would be available. Peppertree Lane, a private road, would remain open for individuals accessing the American Jewish University – Brandeis Bardin Campus located south of the Project site. While construction vehicles and equipment would be accessing the Project site during construction, no road closures or long-term interruptions would occur such that emergency access to and from the American Jewish University – Brandeis Bardin Campus would be rendered inadequate. Fire apparatus access road would comply with Public Roads Standards, Ventura County Fire Apparatus Access Code: Ordinance 29 and Ventura County Fire Department Standard 501. Any potential temporary impacts to emergency access would cease during operations, as operations would consist of the movement of regular passenger vehicles and cargo trucks. Therefore, the proposed Project would result in a less-than-significant impact, and no mitigation is required.

3.20. Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or	☐	☒	☐	☐
ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Background on Tribal Cultural Resources

Tribal Cultural Resources (TCRs) include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a California Native American tribe (Tribe). To qualify as a TCR, the resource must either: (1) be listed on, or be eligible for listing on, the CRHR or other local historic register; or (2) constitute a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a TCR (PRC §21074). AB 52, passed in 2014, also states that tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of TCRs within their traditional and cultural affiliated geographic areas. Therefore, the identification and analysis of TCRs should involve government-to-government tribal consultation between the CEQA lead agency and interested tribal groups and/or tribal persons. (PRC§ 21080.3.1(a)).

Approach to Analysis of Tribal Cultural Resources

Information presented in this section was gathered through AB 52 government-to-government consultation between the City and the California Native American Tribes that have cultural affiliations with the proposed Project site and that have requested to consult on the proposed Project. Supplementary information was gathered from the cultural resources literature and records search, intensive pedestrian survey, and the NAHC SLF search.

Project Notification

AB 52 requires that within 14 days of the lead agency determining that a project application is complete, a formal notice and invitation to consult about the proposed Project is to be sent to all tribal representatives who have requested, in writing, to be notified of projects that may have a significant effect on TCRs located within the proposed Project area (PRC § 21080.3.1(d)).

AB 52 notification letters were sent to the following tribes identified by the NAHC Native American Contact List on June 7, and June 8, 2024:

- Barbareño/Ventureño Band of Mission Indians
- Fernandeño Tataviam Band of Mission Indians (FTBMI)
- Gabrielino-Tongva Tribe

AB 52 Tribal Consultation

To date, two responses were received by the Santa Ynez Band of Chumash Indians and FTBMI. The Santa Ynez Band of Chumash Indians requested no further consultation on the proposed Project on July 16, 2024.

One request to consult was received from the FTBMI on June 11, 2024. The City conducted AB 52 consultation with the FTMBI on July 8, 2024. The FTMBI emphasized the sensitivity of the surrounding area and recommended measures to protect TCRs through full-time monitoring and following recommended protocols in the event of inadvertent discoveries of TCRs or human remains. Consultation concluded on July 15, 2024, after FTBMI reviewed and approved the mitigation measures drafted for this proposed Project.

3.20.1. Environmental Impacts

a. 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, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. No resources have been identified within the Project site that area listed or eligible for listed in the CRHR or local register through the AB 52 consultation process, thus none would be impacted by the proposed Project. Given the high sensitivity of the area, it is possible that archaeological deposits could be encountered during ground disturbing activity. Therefore, a Worker Environmental Awareness Program (WEAP) training session is required before construction, and archaeological and Native American monitoring is required for all ground disturbance. Impacts to historical resources would be reduced by implementation of MMs CUL-2, CUL-3, and CUL-4 by requiring a WEAP training before construction, archaeological and Native American monitoring, and protocols for unanticipated discovery of cultural resources and human remains. With implementation of MMs CUL-2, CUL-3, and CUL-4, impacts to unknown cultural resources that could be considered TCRs would be less than significant with mitigation. Please see Section 3.7 Cultural Resources above for the full text of the mitigation measures.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. No TCRs have been identified within the Project site that were determined by the lead agency to be significant through the AB 52 consultation process; thus, no TCRs would be impacted by the Project. Given the high sensitivity of the area, it is possible that archaeological deposits could be encountered during ground disturbing activity. Therefore, a WEAP training session is recommended before construction, and archaeological and Native American monitoring is recommended for all ground disturbance. Impacts to historical resources would be reduced by implementation of MMs CUL-2, CUL-3, and CUL-4 by requiring a WEAP training before construction, archaeological and Native American monitoring, and protocols for the unanticipated discovery of cultural resources and human remains. With implementation of MMs CUL-2, CUL-3, and CUL-4, impacts to unknown cultural resources that could be considered TCRs would be less than significant with mitigation. Please see Section 3.7 Cultural Resources above for the full mitigation measures.

3.21. Utilities and Service Systems

UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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?	☐	☐	☒	☐
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

3.21.1. Environmental Impacts

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would include the construction of new stormwater drains and route all utilities to existing connections. These activities would occur within a developed area with existing utility facilities and therefore would not cause significant environmental effects. During operations, Project would not require the construction of new utility facilities. Impacts would be less than significant, and no mitigation is required.

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

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would require water supplies during construction primarily for dust suppression and concrete production. However, the demand for water supplies would be temporary and occur intermittently primarily during the earthwork phase of the approximately 12-month construction period. As such, water demand during construction would not require new or expanded water supply resources. Operation of the proposed Project would require water for the four proposed restrooms and irrigation of the landscaped areas. The Project's landscape plan would comply with the requirements of the City of Simi Valley Municipal Code and State Model Water Efficient Landscape Ordinance. Therefore, the proposed Project would result in a less-than-significant impact, and no mitigation is required.

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

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would generate small amounts of wastewater from portable restrooms during the construction period. The volume of wastewater would be negligible compared to the overall wastewater generated by the City of Simi Valley, as an estimated peak number of 70 workers would be present on site during the anticipated 12-month construction period. Construction-generated wastewater would likely be hauled by the contractor and treated by the City of Simi Valley Sanitation Services Division (City of Simi Valley, 2024a). The City's Water Quality Control Plant treats approximately 10 million gallons of wastewater daily from a variety of sources, including discharges from local businesses and industries (City of Simi Valley, 2024b). According to the City of Simi Valley Department of Public Works, equivalent dwelling units (EDUs) (defined as the unit of measure, which is based on the flow characteristics of an average single-family residence in terms of sewage quantity and constituent quality) produce 275 gallons of sewage per day. The proposed warehouse use is assumed to be equivalent to 0.08 EDUs per 1,000 SF of building (City of Simi Valley, 2006b). Therefore, the proposed warehouse is estimated to generate approximately 3,950 gallons of sewage per day, which is well within the maximum capacity of the City's Water Quality Control Plant [(0.08 EDU*275 gallons)*(179,490 SF/1,000 SF)]. Neither construction nor operation of the proposed Project would create a substantial additional demand on the wastewater treatment provider. Impacts would be less than significant, and no mitigation is required.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

LESS-THAN-SIGNIFICANT IMPACT. Construction activities would include demolition and excavation; the largest potential source of solid waste during construction would be demolition waste and excavated material. Construction is anticipated to be hauled offsite to the Simi Valley Landfill, which accepts construction and demolition debris, and supports the State's regulations requiring diversion of at least 50 percent of construction and demolition materials from landfills (Waste Management, 2024). The Simi Valley Landfill. processes over 2 million tons of waste annually and has an estimated remaining permitted capacity of 80 million CY.

During operations, waste generated by the Project would be primarily limited to commercial waste, such as cardboard, plastics, and other packaging waste, as well as domestic waste from workers. Operations would not generate a large quantity of solid waste in excess of the capacity of the Simi Valley Landfill. Project operations would comply with AB 341, Mandatory Commercial Recycling, passed in 2011, which requires businesses that generate 4 CY or more of commercial solid waste per week to arrange for recycling services (CalRecycle, 2024). Recycling waste would further divert a portion of operational waste from landfills. Impacts would be less than significant, and no mitigation is required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

NO IMPACT. The proposed Project would be required to comply with the City of Simi Valley Building and Safety Division's Construction and Demolition Debris Waste Management and Recycling Program. This program requires recycling of 100 percent of asphalt and concrete materials and a minimum of 65 percent of other construction or demolition debris (City of Simi Valley Building and Safety Division, 2023). The Project would also conform to AB 939, also known as the California Integrated Waste Management Act, passed in 2021 (Public Resources Code §§ 40000 et seq.). AB 939 requires each jurisdiction in California to divert at least 50 percent of its waste away from landfills through waste reduction, recycling, or other

means (City of Simi Valley, 2024c). As discussed in Section 3.21.1(d), the Project would also comply with AB 341 to meet State goals of increasing recycling and reducing greenhouse gas emissions. Therefore, the proposed Project would be consistent with related laws pertaining to solid waste disposal. The proposed Project would have no impact, and no mitigation is required.

3.22. Wildfire

WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(a) Substantially impair an 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?	☐	☐	☒	☐
(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?	☐	☐	☒	☐

3.22.1. Environmental Impacts

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would not cause any changes that would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Applicant would be required to prepare a Fire Protection Plan as part of the formal planning application review to ensure fire protection and life safety measures are incorporated in the Project, as required by the State Minimum Fire Safe Regulations and VCFD Ordinance and Standards. The Simi Valley Emergency Plan Operations Plan identifies the Law Branch (primarily the Police Lieutenant) as the responsible entity for coordinating with Public Works Branch traffic engineering to determine evacuation routes depending on the type of emergency (City of Simi Valley, 2008). It is assumed that primary transportation routes, such as Tapo Canyon Road, Royal Avenue, Tapo Street, and East Los Angeles Avenue would be primary evacuation routes in the event of a wildfire emergency. The proposed Project would not involve any full or partial lane closures on these roads. Temporary lane closures may occur on Guardian Street but would not obstruct any of the primary roads that would likely be used as evacuation routes. Upon completion of construction, lane closures would not occur. Therefore, impacts would be less than significant, and no mitigation is required.

b. Would the project, 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?

LESS-THAN-SIGNIFICANT IMPACT. According to the Simi Valley Emergency Plan, the southern portion of Simi Valley has a greater risk exposure to fire due to the predominance of north-facing slopes that are more thickly vegetated than south-facing slopes. Within the southern portions of Simi Valley, the highest fire risk areas are located in the hilly regions southwest of Santa Susana Knolls (City of Simi Valley, 2001). Additionally, according to the California Department of Forestry and Fire Prevention (CAL FIRE), the Project is adjacent to a Very High FHSZ to the east, south, and west (CAL FIRE, 2024). The proposed Project

is within a Local Responsibility Area outside of a Moderate, High, and Very High FHSZ, and all construction activities would occur in an urbanized setting that is currently developed as an office building and parking lot. Although the Project site is adjacent to open space primarily consisting of grasslands, construction activities would not pose a substantial risk of wildfire, as the Project would comply with federal and State regulations for construction fire safety, such as requiring spark arrester protection in vehicles to reduce the potential of ignition. The nearest fire station, VCFD Station #41, is approximately 1.25 miles northwest from the Project site (1910 Church Street) and would provide sufficient fire protection services in the event of a fire during construction or operation. Once operational, the proposed Project would be operated as a warehouse facility and would not pose a substantial risk of fire, as the site would be developed and paved. The proposed Project would not introduce a new risk of fire hazards, as open flames and other flammable materials or activities would not be present on-site during operations. The Project area is unlikely to support favorable conditions for a wildfire; landscaping would be maintained with irrigation. Therefore, the Project would have a less-than-significant impact on exacerbating wildfire risks and exposing people to pollutants from a wildfire, and no mitigation is required.

c. Would the project 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?

LESS-THAN-SIGNIFICANT IMPACT. The proposed Project would include the demolition of an existing office building and the construction of a warehouse building. No new roads, fuel breaks, or new utility infrastructure would be needed. Utility work would be limited to connecting electrical, water, sewer, natural gas, and telecommunications systems to existing connections within their respective rights-of-way. Construction activities would occur in an existing urbanized area, and the Project would comply with federal and State regulations for construction fire safety. As described in Section 3.22.1(b), the proposed Project is not located within a FHSZ nor would it exacerbate the risk of a wildfire due to the developed nature of the site and compliance with construction fire safety regulations. As a result, impacts would be less than significant, and no mitigation is required.

d. Would the project 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?

LESS-THAN-SIGNIFICANT IMPACT. Although the proposed Project is not located within a moderate, high, or very high FHSZ, it is adjacent to a very high FHSZ to the east, south, and west (CAL FIRE, 2024). The Project is considered to be in the urban-wildlife interface and could be vulnerable to wildfire hazards and post-wildfire topographical instability. The Project site elevation gradually increases from southwest to northeast; the low elevation is along the western border at approximately 960 feet, and the high elevation is approximately 1,105 feet along its eastern boundary (South Environmental, 2023a). Project construction would occur within the existing developed footprint. Retaining walls would be constructed to provide soil support along adjacent slopes and would offer protection from potential post-fire downslope hazards. Additionally, the Project site does not fall within a landslide zone (Gorian & Associates, 2023). Therefore, the Project would have a less-than-significant impact on exposing people and structures to downslope flooding or landslides as a result of post-fire slope instability and drainage changes. No mitigation is required.

3.23. Mandatory Findings of Significance

MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(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?	☐	☒	☐	☐
(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.)	☐	☐	☒	☐
(c) Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐			☐

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?

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED.

- As discussed in Section 3.6, Biological Resources, the Project site and surrounding areas are developed and lack native habitats and were not observed to contain any listed plant or wildlife species. Although one candidate species for listing under the CESA, Crotch bumble bee (*Bombus crotchii*), does have a potential to be present in the Project site, they are expected to leave on their own and impacts would therefore be less than significant. Additionally, one CDFW watch list species, Cooper's hawk (*Accipiter cooperii*), has a high potential to forage within the Project site and a low potential to nest there and was determined to have no potential to be present. If present, impacts to Cooper's hawk would be avoided or minimized through the implementation of MM BIO-1, therefore any impacts would be less than significant. The Project has the potential to impact nesting birds and their nursery sites; however, these impacts would be reduced to less than significant with implementation of MM BIO-1 that would require preconstruction nesting bird surveys and monitoring during construction activities. As such, the proposed Project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal with mitigation.
- As discussed in Section 3.7, Cultural Resources, a record search and NAHC SLF search were conducted, and a review of the NRHP, CRHR, Historic Resources Inventory, and local inventories were conducted. The record searches and literature reviews identified one previously recorded prehistoric site within the Project site, one previously recorded cultural resource within the 0.5-

mile search radius, three previous cultural resource studies intersecting the Project site, and 16 studies within the 0.5-mile records search radius. The SLF search produced negative results. As discussed in Section 3.7.2, implementation of MMs CUL-1, CUL-2, CUL-3, and CUL-4 would reduce impacts to historical and archeological resources to a less-than-significant level by requiring a WEAP training before construction, archaeological and Native American monitoring, and protocols for unanticipated discovery of cultural resources and human remains. As such, impacts to major examples of California history or prehistory would be less than significant with mitigation.

Overall, the proposed Project would have less-than-significant impacts with mitigation incorporated regarding the potential to degrade the quality of the environment, reduce habitat and wildlife populations, eliminate plant or animal communities, reduce the range of special-status species, and eliminate California historical resources.

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, effects of other current projects, and the effects of probable future projects.)

LESS-THAN-SIGNIFICANT IMPACT. As discussed in each issue area in Sections 3.3 through 3.22, the proposed Project would have no potentially significant impacts, and mitigation would reduce impacts to less than significant for biological resources, cultural resources, geology and soils, and tribal cultural resources. In the absence of significant Project-level impacts and a relatively small area of impact, the incremental contribution of the proposed Project would not be cumulatively considerable. Generally, contributions to air quality and greenhouse gas emissions impacts are cumulative due to the regional and global nature of air pollution and climate change, respectively. As described in Sections 3.4, Air Quality, and 3.10, Greenhouse Gas Emissions, the proposed Project would have less-than-significant impacts to these issue areas. All projects in the region would comply with applicable laws, further reducing their cumulative impacts to air quality and GHG emissions. Therefore, the proposed Project would not have a cumulatively considerable impact regarding these issues. Impacts are less than significant, and no mitigation is required.

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

LESS-THAN-SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED. Based on the analyses in Sections 3.2 through 3.22, the proposed Project would not have any significant impacts that would cause substantial adverse effects on human beings, either directly or indirectly. All impacts related to adverse effects on human beings, such as aesthetics, air quality, greenhouse gases, hazards and hazardous materials, hydrology and water quality, noise, and wildfire are less than significant. Impacts related to hazards associated with expansive soils would be less than significant with MM GEO-1 incorporated.

4. MITIGATION MONITORING AND REPORTING PROGRAM

Per CEQA Guidelines Section 15097, in order to ensure that the mitigation measures identified in the mitigated negative declaration are implemented, the lead agency must adopt a mitigation monitoring and/or reporting program to mitigate or avoid significant environmental impacts. The Mitigation Monitoring and Reporting Program (Table 13) identifies the mitigation measures and procedures for the proposed Project as identified in the IS/MND.

Table 13. Mitigation Monitoring and Reporting Program

Environmental Factor	Reference No.	Mitigation Measures	Responsible Party	Timing
3.6 Biological Resources	3.6.1(a, d)	**BIO-1 Pre-construction Nesting Bird Survey and Avoidance.** • Ground-disturbing activities and vegetation removal (including tree trimming) may only occur outside the bird nesting season (September 1-January 31). • If ground-disturbing activities or vegetation removal (including tree trimming) are scheduled during the bird nesting season (February 1-August 31), a pre-construction survey for nesting birds must be conducted by a qualified avian biologist with prior experience conducting nest bird surveys for construction projects. A qualified biologist must meet the minimum qualifications for Biological Consultants as listed below: o Must have an undergraduate or graduate degree with coursework in biology, botany, wildlife biology, natural resources, ecology, conservation biology, or environmental biology; o Have an up-to-date subscription to and experience using the California Natural Diversity Database/BIOS; o 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 o 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. • The study area includes the Project site and a 100-foot buffer around the Project site. If no active nests are found, no additional measures are required.	Permittee	Prior to construction

		• If active nests are found, the avian biologist must map the location and document the species and nesting stage. The qualified avian biologist must implement an avoidance buffer area appropriate to the species. The avian biologist may change the avoidance buffer if field observations of bird behavior and biology to ensure the nest is unaffected by Project activities, avoiding a risk of nest failure. The nest site would be fenced and/or flagged in all directions, and this area may not be disturbed until the nest becomes inactive.		
3.7 Cultural Resources	3.7.2 (a-c)	**CUL-1 Cultural Resources WEAP Training.** Before construction, the Permittee must contract with a qualified archaeologist and local Native American monitor to develop Worker Environmental Awareness Program (WEAP) for all personnel involved in Project construction, including field consultants and construction workers. The one-time WEAP training session must be conducted before any Project-related construction activities in the Project site. The WEAP will include relevant information regarding the archaeological sensitivity of the area, including applicable regulations, protocols for unanticipated discoveries, and consequences of violating state laws and regulations. The WEAP will also describe appropriate avoidance and impact minimization measures for cultural resources and tribal cultural resources that could be located at the Project site and will outline further steps needed and who to contact if any potential cultural resources or tribal cultural resources are encountered. The WEAP will emphasize the requirement for confidentiality. The Permittee must submit the WEAP to the City of Simi Valley (City) for review and approval before implementation. All workers, contractors, and visitors must attend the WEAP before entering the Project site and performing any work. The Permittee must provide copies of the training attendance sheets monthly to City staff as a record of compliance with this measure.	Permittee	Prior to construction
3.7 Cultural Resources, 3.20 Tribal Cultural Resources	3.7.2 (a-c), 3.20(a)(ii)	**CUL-2 Archeological and Native American Monitoring.** Prior to the commencement of construction, the Permittee will secure the services of a Native American Monitor from the Fernandeño Tataviam Band of Mission Indians and a qualified archaeological monitor to observe all ground-disturbing activity (i.e clearing, grubbing, grading, trenching, etc.) on a full-time basis. A copy of the contracts or monitoring agreements will be sent to the City of Simi Valley for their review and approval.	Permittee	During construction
3.7 Cultural Resources, 3.20	3.7.2 (a-c), 3.20(a)(ii)	**CUL-3 Unanticipated Discovery of Cultural Resources.** If archaeological resources are encountered during ground	Permittee	During construction

Tribal Cultural Resources		disturbing activity on the site, all activity within a 100-foot radius of the find must be stopped, the City of Simi Valley must be notified, and a qualified archaeologist and Fernandeño Tataviam Band of Mission Indians Native American monitor must examine the find. The archaeological and Native American monitors must evaluate the find to determine if it meets the definition of a historical, unique archaeological, or tribal cultural resource and make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits for any construction occurring within the above-referenced 100-foot radius. The City of Simi Valley will consult in good faith with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any tribal cultural resource encountered. If the find(s) do not meet the definition of a historical, unique archaeological, or tribal cultural resource, no further study or protection is necessary prior to project implementation. If the find does meet the definition of a historical, unique archaeological, or tribal cultural resource, then it will be avoided by project activities. If avoidance is not feasible, adverse effects to such resources will be mitigated in accordance with the recommendations of the archaeological and Native American monitor. Recommendations may include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery must be submitted to the City of Simi Valley, Native American Heritage Commission (tribal cultural resources), and the South Central Coastal Information Center. The Permittee will ensure that construction personnel do not collect or move any cultural material and will ensure that any fill soils that may be used for construction purposes does not contain any archaeological materials.		
3.7 Cultural Resources, 3.20 Tribal Cultural Resources	3.7.2 (a-c), 3.20(a)(i)(ii)	**CUL-4 Unanticipated Discovery of Human Remains.** If human remains are discovered during excavation or grading of the site, all activity within a 100-foot radius of the find will be stopped. The Ventura County Coroner must be notified immediately and will determine whether the remains are of Native American origin or an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of the identification. Once the NAHC identifies the most likely descendant(s) (MLD), the descendant(s) will make recommendations regarding proper burial (including the treatment of grave goods), which will be implemented in accordance with section 15064.5(e) of the California Code of Regulations, Title 14. The archaeologist will recover scientifically valuable information, as appropriate and in accordance with the	Permittee	During construction

		recommendations of the MLD. A report of findings documenting any data recovery must be submitted to the City of Simi Valley, the South Central Coastal Information Center, and the MLD.		
3.9 Geology and Soils	3.9.1 (d)	**GEO-1 Drainage and Landscaping Maintenance.** The construction contractor must adhere to the following maintenance protocols for construction on expansive soils on the Project site: • Positive drainage should be continually provided and maintained away from structures and should not be changed creating an adverse drainage condition. Plumbing leaks should be immediately repaired so the subgrade soils underlying the structure do not become saturated. • Initial landscaping must be undertaken in unpaved areas adjacent to structures. Trees and shrubbery must not be planted where roots can grow under foundations and hardscape when they mature. • Landscaped areas must be maintained in a uniformly moist condition and not allowed to dry out.	Permittee	During and prior to construction
3.9 Geology and Soils	3.9.1 (f)	**GEO-2 Paleontological Resource Monitoring and Mitigation Plan.** Before the start of any Project-related construction activities, the Permittee must retain a State-approved paleontologist (Project Paleontologist) to prepare and implement a project-specific Paleontological Resource Monitoring and Mitigation Plan (PRMMP), which must be approved by the City of Simi Valley Environmental Services Director. The Project Paleontologist is responsible for implementing all the paleontological conditions of approval and for using qualified paleontologists to assist in work and field monitoring. 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 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; • At least two full years professional experience as assistant to a Project Paleontologist with administration and project management	Permittee	Prior to construction

		experience; supported by a list of projects and referral contacts; • Proficiency in recognizing fossils in the field and determining their significance; • Expertise in local geology, stratigraphy, and biostratigraphy; and • Experience collecting vertebrate fossils in the field. At a minimum, information to be contained in the PRMMP, in addition to other information required under the guidelines of the Society of Vertebrate Paleontology (SVP), is as follows: • Description of the Project site and planned earthwork and excavation, and a map identifying locations where excavations and ground disturbing activities will or will be likely to encounter paleontological resources. • The museum or repository that has agreed to accept the recovered fossils must be identified in the PRMMP. • The PRMMP must detail methods of monitoring, recovery, preparation, and analysis of specimens, data analysis, reporting, and the final curation location of specimens at an identified repository. • Identification of personnel with authority and responsibility to temporarily halt or divert ground disturbance activities to allow for recovery of significant specimens. • The PRMMP must be submitted to the City of Simi Valley Environmental Services Director for review and approval 60 days before the start of Project construction.		
3.9 Geology and Soils	3.9.1 (f)	**GEO-3 Paleontological Resources WEAP Training.** Before the start of Project-related construction activities, a WEAP must be developed by the Project Paleontologist. The WEAP must address the potential to encounter paleontological resources in the field, the sensitivity and importance of these resources, and the obligations to preserve and protect such resources consistent with Society of Vertebrate Paleontology standard procedures. The training program must also include the set of reporting procedures that workers are to follow if paleontological resources are encountered during Project activities. The WEAP may be combined with other environmental training programs for the Project. All field personnel will receive WEAP training on paleontological resources before Project-related construction activities.	Permittee	Prior to construction
3.9 Geology and Soils	3.9.1 (f)	**GEO-4 Paleontological Monitoring and Fossil Recovery.** The Project Paleontologist must monitor the Project site.	Permittee	During construction

		Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. If the Project Paleontologist determines full-time monitoring is no longer warranted, based on the geologic conditions at depth, he or she may recommend to the City of Simi Valley Environmental Services Director that monitoring be reduced or cease entirely. • If fossils are discovered, the Project Paleontologist must temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. The Paleontological Monitor, and/or Project Paleontologist must evaluate the discovery and determine if the fossil may be considered significant, and if significant, recover the fossil. • Upon completion of Project ground disturbing activities, all significant fossils collected would 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 fossil specimens must be identified to the lowest taxonomic level practical before curation at an accredited museum. The fossil specimens must be delivered to the approved repository (identified in the Paleontological Resource Mitigation Plan) and receipt(s) of collections submitted sent to the City of Simi Valley Environmental Services Director no later than 60 days after all ground disturbing activities are completed.		
3.9 Geology and Soils	3.9.1 (f)	**GEO-5 Paleontological Resources Monitoring Report.** The Permittee must prepare a paleontological resource mitigation and monitoring report by the Project Paleontologist following completion of ground disturbing activities. The contents of the report must include, but not be limited to a description and inventory list of recovered fossil materials (if any); a map showing the location of paleontological resources found in the field; determinations of scientific significance; proof of accession of fossil materials into the pre-approved museum or other repository; and a statement by the Project Paleontologist that Project impacts to paleontological resources have been mitigated.	Permittee	After construction

5. LIST OF PREPARERS

Table 14. CEQA Lead Agency: City of Simi Valley

Name	Project Role
Zarui Chaparyan, Associate Planner	Project Manager
Naren Gunasekera, Principal Planner/Zoning Administrator	Project Manager

Table 15. CEQA Consultant Team: Aspen Environmental Group

Name	Project Role
Stephanie Tang	Project Manager, Hydrology/Water Quality, Noise, Transportation, Utilities/Service Systems, Wildfire
Avery Robinson	Aesthetics, Agriculture & Forestry Resources, Air Quality, Cultural Resources, Energy, Geology/Soils, Greenhouse Gas Emission, Hazards & Hazardous Materials, Land Use/Planning, Mineral Resources, Population/Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Mandatory Findings of Significance
Brewster Birdsall, PE, QEP	Air Quality, GHG, Noise
Lauren DeOliveira, RPA	Cultural Resources, Tribal Cultural Resources
Justin Wood, MS, CFB	Biological Resources

6. LIST OF ACRONYMS AND ABBREVIATIONS

Acronyms/Abbreviations	Definition
AB	Assembly Bill
ADA	Americans with Disabilities Act
APNs	Assessor's Parcel Numbers
AQMP	Air Quality Management Plan
ATCM	Air Toxic Control Measure
BMPs	best management practices
BP	Business Park
CAAQS	California Ambient Air Quality Standards
CAP	Climate Action Plan
CARB	California Air Resources Board
CCAA	California Clean Air Act
CDFW	California Department of Fish and Wildlife
CDS	Contech Detention System
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CHRIS	California Historical Resources Information Center
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CRHR	California Register of Historical Resource
CY	cubic yard
DOC	Department of Conservation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EDUs	equivalent dwelling units
EIR	Environmental Impact Report
EV	Electric vehicle
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency

FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FTA	Federal Transportation Authority
GHG	greenhouse gas
GWP	global warming potential
HVAC	heating ventilation and air conditioning
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
IS	Initial Study
LOS	level of service
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MM	mitigation measure
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MTCO2e	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NAHC	National American Heritage Commission
NOx	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSR	New Source Review
PCE	passenger car equivalent
$PM_{2.5}$	fine particulate matter
PM_{10}	coarse particulate matter
PRC	Public Resources Code
ppm	parts per million
PPV	peak particle velocity
PRMMP	Paleontological Resource Monitoring and Mitigation Plan

RCNM	Roadway Construction Noise Model
ROG	Reactive Organic Gases
RTP/SCS	Regional Transportation Plan/ Sustainable Communities Strategy
SB	Senate Bill
SCAG	Southern California Association of Governments.
SCCAB	South Central Coast Air Basin
SCCIC	South Central Coastal Information Center
SF	square foot
SLF	Sacred Lands File
SO2	Sulfur Dioxide
SQUIMP	Storm Water Quality Urban Impact Mitigation Management Plan
SVMC	Simi Valley Municipal Code
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCRs	Tribal Cultural Resources
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VCAPCD	Ventura County Air Pollution Control District
VCFD	Ventura County Fire Department
VCOG	Ventura Council of Governments
VdB	vibration decibels
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program
ZEV	zero-emission vehicle

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