TO: All Interested Parties

FROM: Department of Environmental Services

SUBJECT: A GENERAL PLAN AMENDMENT (GPA-103) TO CHANGE THE LAND USE DESIGNATION FROM MOBILE HOME TO RECREATION COMMERCIAL; A ZONE CHANGE (Z-S-743) FROM MOBILE HOME, CONDITIONAL ZONING [MH (CZ)] DISTRICT TO COMMERCIAL RECREATION (CR) DISTRICT; AND A CONDITIONAL USE PERMIT (CUP-S-821) TO CONSTRUCT AND OPERATE A 15-SPACE RECREATIONAL VEHICLE (RV) CAMPGROUND ON A 0.85-ACRE PROPERTY

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:

Monica Dionne
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, California 93063
(805) 583-6342

Copies sent to:

City Council
City Manager
City Attorney’s Office
Planning Commission

City Departments:
City Manager’s Office
Deputy Director/City Clerk
Simi Valley Library (2)

Environmental Services
Deputy Director/City Planner
Case Planner, D. Rosser
Environmental Planner, M. Dionne
Neighborhood Council Coordinator
Neighborhood Council 4
Recording Secretary
Counter Copy
Public Works Department
Engineering (3)
Utilities
Maintenance

County of Ventura
Fire Protection District
Watershed Protection District

Other Government Agencies
Calleguas Municipal Water District
Rancho Simi Recreation and Park District
Fernandeño Tatavium Band of Mission Indians,
Attn: Jairo Avila, M.A., RPA.

Applicant: Les Wagner
2115 Third Street, #201
Santa Monica, CA 90405
(310) 722-3649
CITY OF SIMI VALLEY

MITIGATED NEGATIVE DECLARATION
(NO SIGNIFICANT IMPACT ON THE ENVIRONMENT)

REVIEW PERIOD: October 2, 2019 through October 22, 2019

APPLICANT: Les Wagner
2115 Third Street, #201
Santa Monica, CA 90405

CASE PLANNER: Donna Rosser

ENVIRONMENTAL PLANNER: Monica Dionne

PROJECT DESIGNATION: GPA-103/Z-S-743/CUP-S-821

PROJECT DESCRIPTION: A General Plan Amendment (GPA-103) to change the land use designation from Mobile Home to Recreation Commercial; a Zone Change (Z-S-743) from Mobile Home, Conditional Zoning [MH (CZ)] district to Commercial Recreation (CR) district; and a Conditional Use Permit (CUP-S-821) to construct and operate a 15-space recreational vehicle campground on a 0.85-acre property

PROJECT LOCATION: On the west side of Kuehner Drive, approximately 250 feet south of Katherine Road (APN: 637-0-070-350)

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

I-1 In the event that Native American cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. The Fernandeño Tataviam Band of Mission Indians shall be contacted to consult if any such find occurs. An archaeologist shall be retained and shall complete all relevant California State Department of Parks and Recreation (DPR) 523 Series forms to document the find and submit this documentation to the applicant, Lead Agency, and Fernandeño Tataviam Band of Mission Indians.

I-2 The Lead Agency and/or applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during project grading.

I-3 If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County coroner shall be contacted. If the human
remains are determined to be Native American in origin by the County coroner, the applicant shall immediately notify the Lead Agency, the Fernandeño Tataviam Band of Mission Indians, and consulting Tribes.

RESPONSIBLE AGENCIES:  None

TRUSTEE AGENCIES:  None

Monica Dionne, Associate Planner
1. Project Title: GPA-103/Z-S-743/CUP-S-821

2. Lead Agency Name and Address: City of Simi Valley
   2929 Tapo Canyon Rd.
   Simi Valley, CA 93063

3. Contact Person and Phone Number/Email: Monica Dionne, Associate Planner
   (805) 583-6342
   mdionne@simivalley.org

4. Project Location: On the west side of Kuehner Drive, approximately 250 feet south of Katherine Road (APN: 637-0-070-350)

5. Project Sponsor's Name and Address: Les Wagner
   2115 Third Street, #201
   Santa Monica, CA 90405

6. Current General Plan Designation: Mobile Home
   Proposed General Plan Designation:

7. Current Zoning: Mobile Home (Conditional Zoning) [MH (CZ)]
   Proposed Zoning: Commercial Recreation (CR)

8. Description of Project:

   A General Plan Amendment (GPA-103) to change the land use designation from Mobile Home to Recreation Commercial; a Zone Change (Z-S-743) from Mobile Home, Conditional Zoning [MH (CZ)] district to Commercial Recreation (CR) district; and a Conditional Use Permit (CUP-S-821) to construct and operate a 15-space recreational vehicle (RV) campground on a vacant 0.85-acre property.

   The purpose of the General Plan Land Use designation of Recreation Commercial is to provide sites for commercial activities of a low-intensity, recreational nature, such as miniature, 3 par, and regulation-length golf courses, drive-in theaters, camping grounds, athletic clubs, and other commercial recreation facilities. The change will allow for a campground on the site.

   The current zoning on the site is Mobile Home, Conditional Zoning [MH (CZ)] district which allows for mobile homes on the site with access via a common driveway to Katherine Road and access on Kuehner Drive for emergency purposes only. The applicant proposes to remove the Conditional Zoning to allow access on Kuehner Drive since the parcel has no access to Katherine Road. The purpose of the Commercial Recreation (CR) zoning district is to provide for the development of recreational, entertainment, and associated retail and service activities meant to serve primarily the needs of the local population.
A Conditional Use Permit is required in the CR zoning district for a Lodging–Camping and RV Park for a commercial facility providing space for rental for the purposes of overnight camping and/or the overnight parking and occupancy of recreational vehicles.

The site is a 0.85-acre vacant lot that will not have any permanently fixed structures on-site due to the location being in a Federal Emergency Management Agency (FEMA) designated 100-year flood hazard area, specifically Zone AE - Floodway. The project consists of 15 spaces that have either a 10-ft by 40-ft or 10-ft by 30-ft asphalt parking area for recreational vehicles. Each space is to be occupied by a fully self-contained recreational vehicle with its own restroom, since no common facilities are on-site. In addition, each space will provide:

- A 9-ft by 20-ft asphalt vehicle parking space;
- A 3-ft by 20-ft personal area; and,  
- Water, electrical, and sewer hook-ups.

The RV campground will contain a trash enclosure that consists of PVC pipes and a removable trellis cover that breaks away in the event of a 100-year flood. The applicant must remove the trash enclosure and all recreational vehicles from the site within four hours of a predicted 100-year flood.

The western portion of the site is required to be used for a detention basin and also serves as a recreation area for the visitors of the campground. The area will be landscaped with drought resistant plants and trees, contain a bocce ball court, and have removable tables and chairs.

For landscaping, a minimum 15 percent landscaping is required and the applicant is proposing 24 percent landscaping on the site. The applicant will be required to obtain a tree removal permit to remove the two mature trees on-site, a California Pepper and a two-trunk Edible Walnut. The conceptual landscape plan includes 16 new trees (36" boxed), including Marina Strawberry and Fruitless Olive, nine different types of drought resistant shrubs, and various groundcover.

The proposed Commercial Recreation (CR) zoning district for the site allows for self-contained motorhomes and trailers. The applicant owns the Rocky Trailer Village to the north that consists of permanent recreational vehicle housing. The nearest home is approximately 75 feet away providing a buffer to the RV campground. A vacant parcel located diagonally from the site is zoned CR with potential for additional recreational uses. The adjacent Ventura County flood control channel is part of the Arroyo Simi Greenway with walking and bicycle paths for visitors to the RV campground along with Rocky Pointe Natural Park. Overall the project will have a low impact on the current surrounding uses with access on Kuehner Drive instead of Katherine Road.
9. Surrounding Land Uses and Setting:

<table>
<thead>
<tr>
<th>Subject Site:</th>
<th>GENERAL PLAN</th>
<th>ZONING</th>
<th>CURRENT LAND USE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site: Mobile Home</td>
<td>Existing: Mobile Home, Conditional Zoning [MH(CZ)]</td>
<td>Vacant Lot</td>
<td></td>
</tr>
<tr>
<td>Proposed: Recreation Commercial</td>
<td>Proposed: Commercial Recreation (CR)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>North: Mobile Home</td>
<td>Mobile Home, Conditional Zoning [MH(CZ)] District</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rocky Trailer Village mobile home park; three single-family residences</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South: Medium Density Residential</td>
<td>Residential Medium, Arroyo Simi Greenway Specific Plan [RM (SP)]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ventura County Flood Control Channel; Rocky Pointe Natural Park</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>East: General Commercial</td>
<td>Commercial Industrial (CI)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kuehner Drive with industrial building beyond (currently vacant)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>West: Moderate Density Residential</td>
<td>Residential High (RH)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Private roadway to mobile home park; a single-family residence</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

None

11. Date Deemed Complete/Ready to Process: August 1, 2019

12. A site inspection was performed on:

Date: July 12, 2019 By: Monica Dionne, Associate Planner

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

<table>
<thead>
<tr>
<th>Study Type</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Traffic Study</td>
<td>Yes</td>
</tr>
<tr>
<td>Noise Study</td>
<td>No</td>
</tr>
<tr>
<td>Geotechnical Study</td>
<td>Yes</td>
</tr>
<tr>
<td>Hydrology Study</td>
<td>Yes</td>
</tr>
<tr>
<td>Tree Study and Appraisal (pursuant to Section 9-38 et seq. SVMC)</td>
<td>Yes</td>
</tr>
<tr>
<td>Biological Study</td>
<td>No</td>
</tr>
<tr>
<td>Rare, Threatened and Endangered Species Survey</td>
<td>No</td>
</tr>
<tr>
<td>Wetlands Delineation Study</td>
<td>No</td>
</tr>
<tr>
<td>Archaeological Study</td>
<td>Yes</td>
</tr>
<tr>
<td>Historical Study</td>
<td>No</td>
</tr>
<tr>
<td>Other (List):</td>
<td>No</td>
</tr>
</tbody>
</table>

P 33/9-19(jd)
14. Location Map
15. Aerial Photograph
Site Plan
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION:

On the basis of this initial evaluation:

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.

Approved:

9/20/19

Date

Monica Dionne, Associate Planner, for Stratis Perros, Deputy Environmental Services Director/City Planner
Issues and Supporting Sources:

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

a) Have a substantial adverse effect on a scenic vista? ☐ ☐ ☒ ☐

b) Substantially damage scenic resources, including, but not limited to, trees and rock outcappings? ☐ ☐ ☒ ☐

c) 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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ☐ ☐ ☒ ☐

(a-c) Based on a review of the site plan for the project, a 15-space recreational vehicle (RV) campground would be constructed on the site. The environmental planner conducted a site visit to evaluate the project’s impact on the site, surrounding land uses, scenic vistas, scenic resources, and the existing visual character. The site and surrounding areas are relatively flat. In addition, RVs are typically less than one-story in height. Since the project site is located on the valley floor and substantially surrounded by urban uses, the project would not obstruct any scenic vistas or degrade the existing visual character or quality of the site and its surroundings. According to the tree report prepared for the project (Ref. #34), both on-site trees, an Edible Walnut and a California Pepper, will be removed for the project. However, the project will be required to provide replacement landscaping equal to the value of the removed trees, and proposes to add 16 trees to the project site, each a minimum size of 36-inch box. There are no rock outcroppings in the proposed project area. Therefore, there is a less than significant impact on the environment from an adverse impact to scenic resources or the visual character of the site and its surroundings.

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

The project would create a new source of light from fixtures on the new residences and light standards for the private roadway. The applicant is required to submit an exterior lighting (photometric) plan pursuant to Simi Valley Municipal Code (SVMC) Section 9-30.040.C.1. (Ref. #1). This plan shall consist of a point-by-point foot-candle layout extending a minimum of 20 feet outside the property lines. The plan must achieve the goals established in this subsection in order to eliminate illumination or glare from the project onto adjacent properties or streets. Therefore, there is no potential for a significant impact to the environment from a new source of substantial light or glare.
II. AGRICULTURE AND FORESTRY RESOURCES: Would the project:

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

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

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

   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? □ □ □ ☒

(a-e) The project site is located in an urbanized area of the city. According to the California Department of Conservation, the project site and surrounding area is designated as Urban and Built-Up Land and, therefore, is not subject to a Williamson Act contract. The nearest land under a Williamson Act contract is located approximately five miles north of the project site. The project site and surrounding area are not used or zoned for agricultural, forest, or timberland use. Construction of the project would occur within and adjacent to a fully urbanized area and would not result in the conversion of farmland, forest land, or timberland uses to non-agricultural or non-forest uses. Furthermore, the project would not conflict with agricultural, forest land, or timberland zoning. Therefore, no impacts would occur to the environment from the loss of agricultural and forestry resources.

III. AIR QUALITY:

The significance criteria established by the City or the Ventura County Air Pollution Control District may be relied upon to make the following determinations.

Would the project:

   a) Conflict with or obstruct implementation of the Ventura County Air Quality Management 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? □ ☒ ☒ ☒

(a-c) The “Ventura County Air Quality Assessment Guidelines” (Ref. #3) prepared and released by the Ventura County Air Pollution Control District (APCD), is an advisory document that provides a framework for preparing air quality evaluations for environmental documents.
required by CEQA. Within the Guidelines, Section 3.3 Recommended Significance Criteria provides thresholds for determining the significance of air quality impacts. The City of Simi Valley has adopted a threshold of 25 pounds per day of ROG or NOx for determining the significance of individual projects' impacts, to be consistent with the APCD Guidelines for Ventura County.

ROG and NOx are emitted by mobile and stationary sources associated with projects. When exposed to sunlight, the photochemical reaction results in formation of air pollution, including ozone. Based on the California Air Resources Board CalEEmod air quality analysis program, the project would generate 1.0 pound per day of ROG and 0.13 pounds per day of NOx. These quantities do not exceed the threshold of 25 pounds per day of ROG or NOx. In addition to project specific thresholds, Section 3.3.1 provides the following criteria for determining the significance of cumulative air quality impacts: “A project with emissions of two pounds per day or greater of ROG, or two pounds per day of NOx that is found to be inconsistent with the Air Quality Management Plan (AQMP) will have a significant cumulative adverse air quality impact.” (Ref. #3, Pg. 3-3). Since the project does not exceed two pounds per day of ROG and NOx and will not increase the current population, a determination of the project's consistency with the AQMP is not required.

Therefore, there is no potential for a significant impact to the environment from an impact on air quality and there is no conflict with the Ventura County Air Quality Management Plan.

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

The Ventura County Air Quality Management Plan (AQMP) identifies uses that may require mitigation due to substantial odors (Ref. #3, page 2-16 & Table 6-3). The AQMP does not identify recreational uses, such as an RV campground, as a source of objectionable odors. Therefore, the project would not generate any objectionable odors and there is no potential for a significant impact to the environment from the creation of objectionable odors affecting a substantial number of people.

IV. BIOLOGICAL RESOURCES: Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as 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?

(e) The tree report prepared for the project (Ref. #34) shows that the project site contains two mature trees consisting of one Edible Walnut and one California Pepper, both of which would be removed by the project. The report was reviewed by the City’s consulting arborist, who concurred with its conclusions. However, the project will be required to provide replacement landscaping equal to the value of the removed trees, and proposes to add 16 trees to the project site, each a minimum size of 36-inch box. Therefore, the project would not conflict with the City’s Tree Preservation Ordinance.

(a-d, f) Based on a site visit by the environmental planner, there is no native habitat and no sensitive plant or endangered wildlife species on the project site. There are no aquatic resources that would be regulated by any state or federal agencies. Therefore, there is no potential for a significant impact to the environment from adverse effects on biological resources.

V. CULTURAL RESOURCES: Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5?

(a-b) The subject property is not listed in the Ventura County Historical Landmarks and Points of Interest (Ref. #7). However, because the site is vacant and relatively undisturbed, a Phase I Archaeological Survey was conducted for the site (Ref. #35), which included an archival records search, review of published and unpublished historical and prehistorical references, and an on-foot intensive survey of the subject property. It concluded that no sites had been recorded on or near the project site, and no cultural resources of any kind were observed on the project site. The report recommended that no additional archeological work was necessary on this property. Therefore, there is a less than significant impact to the environment from a substantial adverse change to historical or archaeological resources.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Section 7050.5 of the California Health and Safety Code mandates procedures to be followed when human remains are discovered. This code requirement is implemented for all projects in the City. Therefore, there would be a less than significant no potential for a significant impact to the environment from a disturbance of human remains.
VI. ENERGY: Would the project:

a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?  

☐ ☐ ☒ ☐ ☐

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?  

☐ ☐ ☒ ☐ ☐

(a-b) As part of the General Plan update, the City has adopted a Climate Action Plan (SV-CAP) that identifies energy reduction measures, including a requirement that new development exceed 2008 Title 24 Part 6 Energy Standards by 20 percent, as well as water use reduction measures to reduce water demand by 20 percent. The project will be required to comply with a number of ordinances that implement the goals of the SV-CAP. (Refer to further discussion under Greenhouse Gas Emissions, Section VIII. of this document.)

Simi Valley has adopted an Energy Reach Code, which adopts energy efficiency performance standards that reach higher than is required by Title 24 minimums. The main focus is on efficiency measures that are simple to achieve and enforce, and have the greatest influence on community sustainability. The Reach Code increases energy efficiency requirements for residential and nonresidential structures beyond Title 24, set at 10 and 15 percent respectively for new construction and substantial remodels. Chapter 9-39 of the City of Simi Valley Development Code promotes trip reduction and alternative transportation methods (e.g., carpool, vanpool, public transit, bicycles, walking, park-and-ride lots, improvement in the balance between jobs and housing), flexible work hours, telecommuting, and parking management programs to address traffic increases from new development. The Water Conservation Program Ordinance (Ordinance 1142) will reduce water consumption within the City of Simi Valley through conservation, effective water supply planning, prevention of waste, and will maximize the efficient use of water within the City of Simi Valley. The Water Conservation Ordinance is designed to reduce water use in the City to at least 15 percent below the 2009 baseline. The City is an early adopter of the CALGreen Building Code, which is intended to improve sustainability of the built environment and reduce GHG emissions from new construction. The City’s adopting Ordinance 1167 goes further by including a CEC-approved energy reach code, additional landscape water conservation, and increased recycling.

Therefore, the project would not result in a significant impact with respect to wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS: Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?  Refer to Division of Mines and Geology Special Publication 42.  

☐ ☐ ☒ ☐ ☐
Based on the State of California Earthquake Fault Zones Map (Ref. #8), the property is not located in an Alquist-Priolo Fault zone and no known active faults run through the property. Since there are no known active faults on the property, the proposal would not be impacted by surface rupture. Therefore, there is a less than significant impact to the environment from direct impact of surface rupture from a known earthquake fault or substantial evidence of a known fault.

ii) Strong seismic ground shaking?

According to the preliminary geotechnical report for the project (Ref. #36), the subject site is located in an area subject to strong ground-shaking from earthquakes. The report states that the site is suitable for the proposed construction, provided that the geotechnical engineering recommendations included in the report are implemented. Those recommendations will be required by the Department of Public Works with the issuance of a grading permit for the project. In addition, the California Building Code prescribes procedures for earthquake resistant design which include considerations for seismic zoning. In addition, the site is proposed for an RV campground with no permanent structures. Therefore, there is a less than significant impact to the environment from strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction?

The geotechnical site evaluation of the property determined that the site is located in an area prone to liquefaction with high historical groundwater. The proposed paved areas for RV parking and driveways will be placed on properly compacted fill. Therefore, there is a less than significant impact to the environment from seismic-related ground failure.

iv) Landslides?

Based on the site inspection, the site is not near slopes and landslides do not pose a significant risk to the site. In addition, the property is not identified as an area subject to landslides on the State of California Seismic Hazard Zones Map (Ref. #9). Therefore, there is no potential for a significant impact to the environment from landslides.

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

The project site would consist of landscaping and paving for RV parking and driveways. This will lower the amount of exposed soil that could be eroded. In addition, the project is required to adhere to SVMC Section 9-64.030.c (Grading & Erosion Control). The purpose of this code is to prevent siltation, protect off-site property, and prevent soil loss during grading. Therefore, there is a less than significant impact on the environment from substantial soil erosion or loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

d) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code, creating direct or indirect substantial risks to life or property?
(c-d) The geotechnical report for the property (Ref. #36) evaluated the suitability of the site soils for the proposed construction. The report states that the site is suitable for the proposed construction, provided that the geotechnical engineering report recommendations are implemented, including installation of paving on properly compacted fill. Therefore, there is a less than significant impact to the environment from liquefaction, lateral spreading, or settlement.

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

The proposed project will connect to the existing sewer system and is not proposing the use of septic tanks or an alternative wastewater disposal system. Therefore, there is no potential for a significant impact to the environment from soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

According to the geotechnical report, the site is underlain by Quaternary alluvium (mainly silty sand and gravel), which has a low potential for containing paleontological deposits (Ref. #5, Engineering Science, Inc., Paleontologic Resource Assessment Overview, Simi Valley, Ventura County, California, February 1986). Therefore, there is a less than significant impact to the environment from the direct or indirect destruction or a unique paleontological resource or unique geologic feature.

VIII. GREENHOUSE GAS EMISSIONS: Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

(a-b) The City of Simi Valley relies upon the expert guidance of the Ventura County Air Pollution Control District (VCAPCD) regarding the methodology and thresholds of significance for the evaluation of air quality impacts within Ventura County. Greenhouse Gas (GHG) emissions are air pollutants that are subject to local control by the VCAPCD. As such, the City looks to the VCAPCD for guidance in the evaluation of GHG impacts. In September 2011, the Ventura County Air Pollution Control Board requested that VCAPCD staff report back on possible GHG significance thresholds for evaluating GHG impacts of land use projects in Ventura County under CEQA. VCAPCD staff responded to this request by preparing a report entitled Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County. This report presents a number of options for GHG significance thresholds and summarizes the most prominent approaches and options either adopted or being considered by all other air districts throughout California. Similar to other air districts, VCAPCD staff members are considering a tiered approach with the main components involving consistency with a locally adopted GHG reduction plan followed by a bright-line threshold for land use projects that would capture 90 percent of project GHG emissions. The South Coast Air Quality Management District (SCAQMD) is also considering these strategies
for land use projects. The most recent proposal issued in September 2010 included a screening threshold of 3,000 MTCO2e/year for all non-industrial projects.

For the purpose of evaluating the GHG impacts associated with the project, a threshold of 3,000 MTCO2e/year was used for plan level analyses. This threshold was used since it was developed based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The annual net GHG emissions associated with the construction of the project is 45 MTCO2e/year, and the net GHG emissions for project operation is 18.5 MTCO2e/year. Combined, these emissions total to less than the SCAQMD screening threshold for non-industrial projects of 3,000 MTCO2e/year.

As part of the General Plan update, the City has adopted a Climate Action Plan (SV-CAP) that includes a baseline GHG emissions inventory, a methodology for tracking and reporting emissions in the future, and recommendations for GHG reduction strategies as a foundation for these efforts. The SV-CAP focuses on the various goals and policies of the General Plan relative to greenhouse gas emissions. The SV-CAP is designed to ensure that the impact of future development on air quality and energy resources is minimized and that land use decisions made by the City and internal operations within the City are consistent with adopted state legislation. The SV-CAP identifies energy reduction measures, including a requirement that new development exceed 2008 Title 24 Part 6 Energy Standards by 20 percent, and water use reduction measures to reduce water demand by 20 percent. The project will be required to comply with a number of ordinances that implement the goals of the SV-CAP. Simi Valley has adopted an Energy Reach Code, which adopts energy efficiency performance standards that reach higher than is required by Title 24 minimums. The main focus is on efficiency measures that are simple to achieve and enforce, and have the greatest influence on community sustainability. The Reach Code increases energy efficiency requirements for residential and nonresidential structures beyond Title 24, set at 10 and 15 percent respectively for new construction and substantial remodels. Chapter 9-39 of the City of Simi Valley Development Code promotes trip reduction and alternative transportation methods (e.g., carpools, vanpools, public transit, bicycles, walking, park-and-ride lots, improvement in the balance between jobs and housing), flexible work hours, telecommuting, and parking management programs to address traffic increases from new development. The Water Conservation Program Ordinance (Ordinance 1142) will reduce water consumption within the City of Simi Valley through conservation, effective water supply planning, prevention of waste, and will maximize the efficient use of water within the City of Simi Valley. The Water Conservation Ordinance is designed to reduce water use in the City to at least 15 percent below the 2009 baseline. The City is an early adopter of the CALGreen Building Code, which is intended to improve sustainability of the built environment and reduce GHG emissions from new construction. The City’s adopting Ordinance 1167 goes further by including a CEC-approved energy reach code, additional landscape water conservation, and increased recycling.

Based on all of the above information, the project would have a less than significant impact with respect to GHG emissions or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?  

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

(a-c) The storage, handling, or use of any hazardous materials is regulated by state and local regulations. The California Building Code regulates the types and amounts of hazardous substances allowed in conventional structures (Ref. #10). Storage of any amount of hazardous materials is subject to Fire District and Ventura County regulations. These regulations limit the amount of hazardous materials that can be stored in these facilities in order to ensure public safety is protected. In addition, recreational uses such as RV campgrounds do not involve the transport, storage, or use significant amounts of hazardous materials. Therefore, there is no potential for a significant impact to the environment from the routine transport, use, disposal or release of hazardous materials.

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

The project site is not listed on the California Environmental Protection Agency, Department of Toxic Substances Control, Site Mitigation and Brownfields Reuse Program Database (Ref. #16). Therefore, there is a less than significant impact to the environment from a hazardous material.

e) For a project located in 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?  

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

The closest airport is the Van Nuys Airport, located approximately 20 miles southeast of the project site. The project site is not located within an airport land use plan area or within two miles of a public or private airport. Therefore, there would be no impact for the project related to safety hazards or excessive noise from airport related uses.

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

There is direct access to the site from Kuehner Drive for emergency response organizations and the property is already included in the City’s emergency response and evacuation plan. Development of the property has been anticipated by these plans and there is no need to amend the existing procedures. Therefore, there is no potential for a significant impact to the environment from interference with an adopted emergency response or evacuation plan.

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☒</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

The project site is not identified as a potential wildfire hazard area as shown on the Fire Hazard map in the City of Simi Valley General Plan (Ref. #12: City of Simi Valley, General Plan, Figure S-2, pg. 8-9) or within a CalFire Very High Fire Hazard Severity Zone (Ref. #37: CalFire: Very
High Fire Hazard Severity Zones in LRA Map, October 6, 2010). Therefore, there is a less than significant potential for a significant impact to the environment from exposure of people or structures to wildland fires.

X. HYDROLOGY AND WATER QUALITY: Would the project:

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

The project would be connected to the existing sewer system and any wastewater would be collected and processed at the City’s sanitation plant. The project will meet the requirements of the latest Stormwater Quality Urban Mitigation Plan (SQUIMP) by installation of stormwater filtration units meeting the Stormwater Quality Design Flow established by Ventura County. In addition, the standing water within excavation will be handled pursuant to State requirements governing the handling of such construction related groundwater. Based on these conditions, water discharged from the site would not violate any water quality standards. Therefore, there is a less than significant impact to the environment from violating any water quality standards or waste discharge requirements.

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

The project would receive its domestic water supply from the existing distribution system. There is no proposal to use a well or groundwater from the site. Therefore, there is no potential for a significant impact to the environment from depleting groundwater supplies or interfering substantially with groundwater recharge.

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

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

The property is surrounded by existing improvements. According to the Site Hydrology Report for the project (Ref. #38), the site will drain to a lined detention vault (bypass basin) with a backflow prevention device in the western corner of the project site. All storm water flows will be detained before leaving the site. Since on-site drainage will be directed to a bypass basin and there would be substantially less exposed soil after site development, the project would not result in substantial soil erosion or siltation. Therefore, there is no potential for a significant impact to the environment from substantial soil erosion or the loss of topsoil.

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

According to the Site Hydrology Report, the project will provide a stormwater bypass basin on the site, with a pipe connection to the Ventura County Watershed Protection District (VCWPD) channel, for which the applicant will obtain an encroachment permit from VCWPD. The post development outflow will be limited to a pre-development 10-year storm...
event. Therefore, there is no potential for a significant impact to the environment from a substantial increase in the rate or amount of surface runoff in a manner which would result in flooding on or off site.

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

The State NPDES MS4 permit requires all new development to treat the “first flush” of all storms. The hydrology report submitted for this project has calculated the stormwater volume that must be treated. Captured storm flows will be pretreated prior to the water leaving the site. Therefore, there is a less than significant impact on the environment from exceeding the capacity of existing stormwater drainage systems or an increase in polluted runoff.

iv. Impede or redirect flood flows?

The site is located within a FEMA Special Flood Hazard Area (SFHA) (Ref. #19), Floodway Zone AE/Regulatory Floodway. The site has been designed in a manner consistent with FEMA regulations as well as the City of Simi Valley floodplain ordinance. There are no permanent structures being proposed that would alter flood flows.

In addition, the project site is not located near a large body of water that would produce seiches (seismically induced waves) nor is the site located in a tsunami inundation area. Therefore, there is no potential for a significant impact to the environment from a release of pollutants due to project inundation.

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

According to the Site Hydrology Report (Ref. #38), the project will drain to a stormwater bypass basin on the site that will meet City requirements. The project will meet the requirements of the latest Stormwater Quality Urban Mitigation Plan (SQUIMP) by installation of Stormwater filtration units meeting the Stormwater Quality Design Flow established by Ventura County. In addition, any standing water within excavation areas will be handled pursuant to State requirements governing the handling of such construction related groundwater. Based on these conditions, water discharged from the site would not violate any water quality standards.

XI. LAND USE AND PLANNING: Would the project:

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?

(a-b) Based on a review of the current General Plan, it has been determined that the project is consistent with the goals, policies, and implementation measures adopted for avoiding or mitigating an environmental effect. The project complies with all thresholds related to air quality,
stormwater runoff, air quality, noise, and traffic generation. Therefore, there is no potential for a significant impact on the environment.

XII. MINERAL RESOURCES: Would the project:

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

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? □ □ ✗ □ □

(a-b) Based on the geotechnical Site Investigation, the subsurface soil conditions encountered in the project site during the field exploration consisted mainly of alluvial soils. According to the Geology and Mineral Resources Study of Southern Ventura County, California, by the California Division of Mines and Geology, there are no known mineral resources of value to the region in alluvium aside from sand and gravel for concrete aggregate and there are no mineral resources in the engineered fill (Ref. #23, Pgs. 27 & 28).

The project is located outside the area delineated as the Simi Oil Field on the California Department of Conservation, Division of Oil and Gas, District 2 Oil Field Map (Ref. #24). There are no oil or gas wells located on the property according to the California Department of Conservation, Division of Oil and Gas, Regional Wildcat Map, W2-1 (Ref. #25). Locally important mineral resources have been mapped by the State and included in the City’s General Plan Land Use Element. The project is located outside the area identified as a natural resource area on the Land Use Map for the City’s General Plan. Therefore, there is no potential for a significant impact to the environment from the loss of availability of a regionally, statewide, or locally important mineral resource.

XIII. NOISE: Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? □ □ ✗ □ □

The project site is located adjacent to residences, considered noise sensitive per the City’s General Plan, to the north and west of the site. An RV campground is not considered to be a land use that produces significant noise. Noise from the RVs would generally be self-contained. In addition, this type of use does not involve manufacturing, processing, or generation of large amounts of traffic which could produce a substantial increase in ambient noise. The General Plan establishes noise standards for noise sensitive land uses of 45 dB(A) CNEL for interior, and 63 dB(A) CNEL for private outdoor living areas.

One source for a potential increase in ambient noise levels is project-generated traffic. In general a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Since noise is measured on a logarithmic scale, the project would need to produce twice the current amount of traffic on surrounding streets (a 100 percent increase) in order to increase noise energy by 3 dB(A). The trip generation study prepared for the project (Ref. #39) estimated an average of 97 daily trips, which would not double the current traffic noise in the area. The additional trips would increase traffic noise by less than 1 dBA, which would not be a noticeable change at existing noise sensitive receptors.
Though there could be temporary increases in ambient noise levels associated with project construction activities in excess of established General Plan maximums, per the Simi Valley Municipal Code noise generated by construction is not considered a significant impact providing activities take place between the hours of 7:00 a.m. to 7:00 pm. Therefore, there would be a less than significant impact from generation of a substantial temporary increase in ambient noise levels in the vicinity of the project.

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

The City of Simi Valley has not adopted vibration guidelines or standards, either as part of the General Plan or SVMC. Estimated groundborne vibration levels are based upon noise levels reported by the FHWA Highway Construction Noise Handbook (2006), the FTA Transit Noise and Vibration Impact Assessment (2006), and the distance to nearby sensitive receptors. Vibration thresholds have been established by the FTA for disturbance of people at 72 VdB for residences and buildings where people normally sleep. This threshold applies to “frequent events,” which the FTA defines as vibration events occurring more than 70 times per day. The thresholds for frequent events are considered appropriate because of the scale and duration of proposed construction activity.

Construction activity associated with the project would create temporary groundborne vibration on and adjacent to the project site from various types of construction equipment. Pile driving is not included as a potential source of vibration in this analysis because the project does not propose any permanent structures, which would typically require driven piles or caissons. Vibration levels are typically detectable by people living in the vicinity of the activity causing groundborne vibration. Groundborne vibration at the nearest sensitive receptor would be detectable when loaded trucks are delivering construction material or large bulldozers are operating. However, construction activity would only occur during daytime hours, in compliance with SVMC Section 5-16.02, which would avoid sleep disruption. Therefore, there is a less than significant impact to the environment from the generation of excessive groundborne vibration or groundborne noise levels.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The closest airport is the Van Nuys Airport, located approximately 10 miles southeast of the project site. The project site is not located within an airport land use plan area or within two miles of a public or private airport. Therefore, there would be no impact for the project related to safety hazards or excessive noise from airport related uses.

XIV. POPULATION AND HOUSING: Would the project:

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

The proposal is located in an urban area of the City. There is no need for additional public roads, utilities, or other public infrastructure to the project site. An RV campground is not considered a use that would lead to population growth in an area as the use of RV campsites
is considered transitory in nature. Therefore, there is no potential for a significant impact to the environment from substantial population growth in the area.

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

Based on the site visit by the environmental planner, there are no dwelling units located on the property. Therefore, there is no potential for a significant impact to the environment from the displacement of any existing dwelling units.

XV. PUBLIC SERVICES:

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

   Fire Protection? ☐ ☐ ☒ ☐
   Police Protection? ☐ ☐ ☒ ☐
   Schools? ☐ ☐ ☒ ☐
   Parks? ☐ ☐ ☒ ☐
   Other public facilities? ☐ ☐ ☒ ☐

The property is located 1.3 miles from Ventura County Fire Protection District Station Number 43, located at 5874 E. Los Angeles Avenue. Due to the existing streets, short distance, and level topography from the station to the site, the Fire District can meet their standard response time of five minutes by traveling 30 miles per hour.

The Police Department has established acceptable standards for patrol officer response times to calls for service in the City. The acceptable response times to emergency calls average 3.2 minutes, non-emergency response times average 12 minutes. The Police Department tracks response times and is meeting these standards, based on the Department's latest statistics. To maintain these response times to the public, the Police Chief may reconfigure police beat boundaries; adjust deployment schedules for patrol shifts, or request funding for the creation of special task forces to deal with any increase in calls for service due to the proposed project.

The need for public facilities including schools and parks is based on the demand generated by the population. The project would result in the creation of an RV campground, which is not a use considered to generate a population increase; therefore, there would be no potential for a substantial adverse effect on public services or facilities including fire protection, police protection, schools, parks or recreational facilities which could result in significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives.

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

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

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? □ □ □ ☒

(a-b) Based on the answer to question XV. a) (Parks), there is no increase in population expected form this project, and thus no new community recreational facilities or expansion of existing community facilities are proposed as a result of this project. Therefore, there is no potential for a significant impact to the environment from an impact on recreation.

XVII. TRANSPORTATION/TRAFFIC: Would the project:

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

b) Conflict with an applicable congestion management program such as level of service standards and travel demand measures, or other standards established by the local congestion management agency for designated roads or highways? (Compliance with CEQA Guidelines section 15064.3, subdivision (b) regarding revisions to criteria for transportation impacts is not required until July 2020.) □ □ ☒ □

(a-b) The project will provide a sidewalk along its public street frontage on Kuehner Drive. The project will not affect any existing or planned bicycle paths or bus pullouts in the vicinity. The project has been reviewed by the City’s Traffic Engineering Division, which has determined that the project would not affect any public transit or bicycle facilities. Therefore, there is no potential for a significant impact to the environment from a conflict with adopted policies, plans, or programs addressing the circulation system.

A trip generation study was prepared for the project (Ref. #39). The analysis calculates that the proposed project would generate 97 average daily trips, with three morning peak hour trips and four evening peak hour trips. The analysis examined the local arterial intersections and determined that the project would not change the level of services at those intersections.

To address cumulative traffic impacts, the City adopted LOS “C” as the design objective for the arterial street system. To meet this design objective, individual projects are required to provide a circulation analysis and traffic improvements to meet LOS “C” at all affected intersections. The Traffic Model used by the City to determine impacts on the circulation system has been updated each time a General Plan Amendment has been approved so that the model is kept up-to-date. Based on the City’s Traffic Model and the project’s Traffic Impact Analysis, no intersections in the vicinity would operate below a level of service “C” under future traffic conditions.

Based on this evidence, the project would have a less than significant impact to the environment from project traffic or conflict with other modes of transportation.
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

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

SVMC Section 9-34.090 has specific design requirements for new access drives. These include minimum standards for width, grade, angle, surface, and clearance. The City of Simi Valley Department of Public Works, Department of Environmental Services, and the Ventura County Fire Protection District have reviewed the project and determined that those standards would be satisfied. Compliance with those design standards protects against the possibility of creating a substantial hazard due to a design feature. Therefore, there is no potential for a significant impact to the environment from a substantial increase in hazards due to a design feature.

d) Result in inadequate emergency access?

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

The development will access Kuehner Drive via a minimum 25-foot wide driveway at the east end of the site. The City’s Traffic Engineering Division has determined the access design complies with SVMC Section 9-34.090, which ensures adequate and safe access onto a public right-of-way. Therefore, there is no potential for a significant impact to the environment from inadequate access.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

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

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

(a-b) In addition to being partially graded during the construction of the adjacent VCWPD channel, the site shows evidence of moderate ground disturbance, such as vegetation clearing and vehicular and pedestrian activities, that would likely have compromised any potential tribal cultural resources on the site. However, to comply with State law AB 52, the City invited local interested tribes to consult on the project. The Fernandeño Tatavium Tribe of Mission Indians (FTBMI) requested consultation, from which the tribe found the project area to be sensitive for Tribal Cultural Resources, and provided recommendations that would protect potential resources if discovered. Therefore, the applicant has incorporated the following mitigation measures into the project:

- In the event that Native American cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find.
The Fernandeño Tataviam Band of Mission Indians shall be contacted to consult if any such find occurs. An archaeologist shall be retained and shall complete all relevant California State Department of Parks and Recreation (DPR) 523 Series forms to document the find and submit this documentation to the applicant, Lead Agency, and Fernandeño Tataviam Band of Mission Indians.

- The Lead Agency and/or applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during the project grading.

- If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County coroner shall be contacted. If the human remains are determined to be Native American in origin by the County coroner, the applicant shall immediately notify the Lead Agency, the Fernandeño Tataviam Band of Mission Indians, and consulting Tribes.

Therefore, with incorporation of the above mitigation measures, there is a less than significant impact to the environment from a substantial adverse change in the significance of a tribal cultural resource.

XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:

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

Wastewater from the project would be collected by the existing sewer system. All the wastewater from the project would be treated at the City’s wastewater treatment facility. Based on a calculation by the City of Simi Valley Department of Public Works, equivalent dwelling units (EDU) produce 275 gallons of sewage per day. Based on this, the 15 proposed RV campground spaces, each with its own sewer connection, would produce 2,475 gallons of sewage per day. Currently, the City’s Wastewater Treatment Plant handles approximately 10 million gallons of sewage per day (mgd). The facility’s capacity is 12.5 mgd. The wastewater collection system and the City’s water delivery system have not reached capacity. The City’s Department of Public Works has reviewed the proposal and determined that no additional water or wastewater treatment facilities are required. Based on this information, the project would not generate sewage that exceeds the limits of the City’s Wastewater Treatment Plant.

Electricity would be provided to the project site by SCE, and natural gas would be provided by SoCalGas. Telecommunications are generally available in the project area, and facility upgrades would not likely be necessary. Therefore, there is a less than significant impact on the environment from the project requiring or resulting in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities.
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

New or expanded entitlements of water supplies are not needed for this project. The Golden State Water Company supplies water to the project area, and in turn, receives its water supply from the Calleguas Municipal Water Agency (a member agency of the Metropolitan Water District of Southern California). Golden State has reviewed the proposed project and indicated that the current and future water supplies are adequate for project. The applicant will be required to obtain a will-serve letter from Golden State in order to move forward with the project. Therefore, there is a less than significant impact to the environment due to insufficient 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?

Wastewater from the project would be collected by the existing sewer system. All the wastewater from the project would be treated at the City’s wastewater treatment facility. Based on a calculation by the City of Simi Valley Department of Public Works, equivalent dwelling units (EDU) produce 275 gallons of sewage per day. Based on the 0.6 EDU equivalent per RV space, at 15 spaces the project would produce approx. 2,475 gallons of sewage per day. Currently, the City’s Wastewater Treatment Plant handles approximately 10 million gallons of sewage per day (mgd). The facility’s capacity is 12.5 mgd. The wastewater collection system and the City’s water delivery system have not reached capacity. The City’s Department of Public Works has reviewed the proposal and determined that no additional water or wastewater treatment facilities are required. Therefore, there is a less than significant impact to the environment due to inadequate 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?

(d-e) The Simi Valley Landfill and Recycling Center (SVLRC) would serve the proposed project. The SVLRC has a capacity of 123.1 million cubic yards of waste. Based on the maximum permitted disposal rate of 6,000 tons per day (tpd), seven days per week, 358 days per year, the site could operate until 2051 (Ref. #30). Waste Management accepts waste from a variety of sources, but they are restricted to the approval rate of 6,000 tons per day. Therefore, the SVLRC, at a minimum, has the ability to accept waste until 2051. To comply with AB 939, the City has achieved a landfill diversion rate of at least 50 percent of its annual solid waste. Therefore, there is a less than significant impact to the environment from an insufficient permitted capacity to accommodate the project’s solid waste disposal needs.
XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

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 downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

□ □ ☒ ☒ ☒

(a-d) The project site is not identified as a potential wildfire hazard area as shown on the Fire Hazard map in the City of Simi Valley General Plan (Ref. #8: City of Simi Valley, General Plan, Figure S-2, pg. 8-9), or within a CalFire Very High Fire Hazard Severity Zone (Ref. #37) Therefore, there is a less than significant potential for a significant impact to the environment from the effects of wildland fires.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

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

□ □ ☒ ☒ ☒

Based on the answers to Section IV. a) (Biological Resources) there are no rare or endangered species present on the site and the parcel is not suitable habitat for any wildlife species or community. Since the project is within the urbanized area of the City, is surrounded by development, and has previously been partially graded/disturbed, construction on this site will not degrade the quality of the environment to a point that would threaten any animal or plant species. Based on the answers to Section I. (Cultural Resources), the site does not contain historic resources or examples of California history or prehistory. There are no historical structures located on the parcel. Therefore, the project will have a less than significant impact on the environment from degradation of the quality of the environment, substantial reduction of habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, reduction in the number or restriction of the range of an endangered, rare, or threatened species or elimination of important examples of the major periods of California history or prehistory.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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 as defined in Section 15130 of the State CEQA Guidelines?)

□ □ □ ☒ ☒
According to the Ventura County Air Pollution Control District Air Quality Management Plan (AQMP), if the project is consistent with the AQMP, it would have a less than significant cumulative impact on air quality. According to the Air Quality Assessment Guidelines of the Ventura County Air Pollution Control District (Ref. #3: Pg. 4-6, Sec. 4.2.3.1), consistency with the Air Quality Management Plan (AQMP) can be determined by comparing actual population in the City with the population forecasted by the South Coast Association of Governments (SCAG). If the current estimated population of the City is below the available forecasted population, the project is determined to be consistent with the AQMP. There is no population increase expected from this project. Since the current population of Simi Valley (128,498) is less than the SCAG population forecast of 142,200 for the year 2040, the proposed project is consistent with the AQMP. Therefore, there is a less than significant cumulative impact on air quality.

In order to address cumulative traffic impacts, the Circulation Element of the General Plan adopted a Level of Service (LOS) “C” as the design objective for the arterial street system. To meet this design objective, individual projects are required to provide a circulation analysis and any traffic improvements to meet LOS “C” at all affected intersections. Since the last update of the General Plan in 2012, the Traffic Model used by the City to determine impacts on the circulation system has been updated each time a General Plan Amendment has been approved so that the model is kept up-to-date. Therefore, there is a less than significant cumulative impact on traffic and transportation.

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

Since the project is consistent with the Air Quality Management Plan, the National Pollution Distribution Elimination Permit, and the City’s traffic model indicates that all intersections affected by the project will operate at LOS “C” or better at buildout of the current General Plan, there is a less than significant impact to the environment from impacts that are individually limited, but cumulatively considerable.

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

Significant impacts to air quality, hydrology and significant impacts from hazardous materials, geologic conditions and noise have the potential to cause substantial adverse effects on human beings. Based on the answers to questions II. a) - d), the project would not have a significant impact due to pollution, consistency with the Air Quality Management Plan, exposure of sensitive receptors to significant pollution concentrations, or odors. Based on the answers to questions X. a) - d), the project would not have a significant impact due to the use or transport of hazardous materials, accidental release of hazardous materials, release of hazardous materials within a quarter mile of a school, or development on a hazardous materials site. Based on the answers to questions X. a) - e), the project would not have a significant impact due to erosion, flooding, and polluted runoff. Based on the answers to questions VII. a) - f), the project would not have a significant impact due to surface rupture, seismic ground failure, or landslides. Based on the answers to questions XIII. a) - c), the project would not have a significant impact on the environment due to the exposure of persons
to noise levels in excess of standards established in the General Plan, the increase of ambient noise by 3 dB(A), or a substantial temporary or periodic increase in ambient noise levels.

Therefore, there is no potential for a significant impact to the environment from effects which will cause direct or indirect substantial adverse effects on human beings.
XXII. REFERENCES:

1. City of Simi Valley, Development Code, Title 9 of the City of Simi Valley Municipal Code.
3. Ventura County Air Pollution Control District, Ventura County Air Quality Assessment Guidelines, (2003).
14. City of Simi Valley, Street Map (Current).
20. Ventura County Municipal Stormwater NPDES Permit (Board Order No. R4-2010-0108, Permit # CAS 004002).
22. Ventura County Flood Control District, Inundation Map for Las Llajas Dam, dated November 1999.
25. California Department of Conservation, Division of Oil and Gas, Regional Wildcat Map, Map W2-1, June 12, 2001.


34. TREES, etc., *Horticultural Tree Report - Rocky Trailer Village*, December 5, 2018.


XXIII. LIST BELOW THE PERSON OR PERSONS WHO PREPARED OR PARTICIPATED IN THE PREPARATION OF THE INITIAL STUDY.

Case Planner: Donna Rosser
Environmental Planner: Monica Dionne
Project Engineer: Steve Benjamin
Traffic Engineer: Justin Link