



CITY OF SIMI VALLEY

Home of The Ronald Reagan Presidential Library

REVIEW PERIOD: October 1, 2020 – October 20, 2020

TO: All Interested Parties

FROM: Department of Environmental Services

SUBJECT: REQUEST FOR REVIEW OF THE INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR CUP-S-831/SP-S-7-AMD#28, TO ALLOW A WAREHOUSE/DISTRIBUTION USE IN THE WEST END SPECIFIC PLAN MIXED USE ZONE, AND TO OPERATE A WAREHOUSE/DISTRIBUTION FACILITY IN AN EXISTING 290,000 S.F. BUILDING.

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

Environmental Services
Environmental Services Director
Deputy Director/City Planner
Principal Planner/Zoning Administrator
Case Planner, N. Gunasekera
Environmental Planner, M. Dionne
Recording Secretary

Counter Copy
Public Works Department
Engineering (3)
Utilities
Maintenance

Community Services
Neighborhood Council Coordinator
Neighborhood Council 3

County of Ventura
Fire Protection District
Watershed Protection District

Jairo Avila, Fernandeno Tatavium Band of Mission Indians (thcp@tataviam-nsn.us)

Applicant: Greenlaw Partners
Derek Meddings
(949) 331-1332
derek@greenlawpartners.com

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

REVIEW PERIOD: October 1, 2020 – October 20, 2020

APPLICANT: Greenlaw Partners
Attn: Derek Meddings
18301 Von Karman, Suite 250
Irvine, CA 92612
(949) 331-1332

CASE PLANNER: Naren Gunasekera

ENVIRONMENTAL
PLANNER: Monica Dionne

PROJECT DESIGNATION: CUP-S-831/SP-S-7-AMD#28

PROJECT DESCRIPTION: A Conditional Use Permit (CUP-S-831) to operate a warehouse and distribution facility in an existing 290,000 square-foot building; and a Specific Plan Amendment (SP-S-7-AMD#28) to amend the West End Specific Plan to allow a warehouse and distribution use in the Mixed Use (MU) zone within the West End Specific Plan with a Conditional Use Permit.

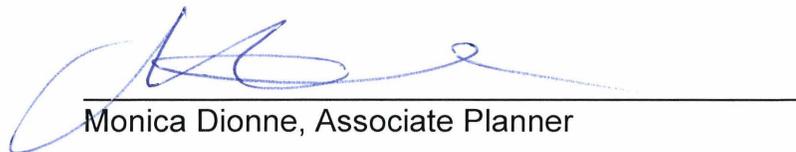
PROJECT LOCATION: 400 National Way

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 measure into the project by the applicant:

I-1 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 (Contact Phone: (818) 837-0794; Email: thcp@tataviam-nsn.us).

RESPONSIBLE AGENCIES: None

TRUSTEE AGENCIES: None



Monica Dionne, Associate Planner

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

1. Project Title: CUP-S-831/SP-S-7, AMD#28
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, (805) 583-6342
mdionne@simivalley.org
4. Project Location: 400 National Way, Simi Valley, CA 93065
5. Project Sponsor's Name and Address: Greenlaw Partners, Attn: Derek Meddings
18301 Von Karman, Ste. 250
Irvine, CA 92612
6. General Plan Designation: Mixed Use
7. Zoning: Mixed Use (West End Specific Plan) [MU (SP)]
8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation.)

Conditional Use Permit

Request includes a Conditional Use Permit to repurpose the existing office building on the 43.55-acre former Bank of America parcel as a warehouse and distribution center. The project site is located at 400 National Way at the terminus of Madera Road north of the 118 Freeway.

The site currently consists of a vacant 290,000 square-foot office building, parking lot and landscaped areas, as well as a parking garage on the northerly portion of the lot. The Conditional Use Permit will allow the interior remodeling of the office building and exterior modifications required for the site to be utilized as a warehouse and distribution center. Items will be brought to the warehouse on trailers and box trucks, and stored temporarily before being loaded onto smaller vans for delivery to households and businesses in and around Simi Valley.

The existing building ranges from 34 feet to 40 feet in height. Exterior changes to the building will include a façade renovation, addition of new loading doors, and a 27,241 square-foot canopy addition to the south side of the building to create a covered van loading zone.

Trailers and box trucks will utilize an existing loading dock on the east side of the building. Delivery vans will be staged on the east side of the building before moving to the south side for loading. Access to the project will be via the existing roadways, Madera Road and National Way, and the project will utilize existing driveways for entrance into the site. A new interior driveway will be created to connect the van loading

zone to an existing driveway that leads out to National Way. Portions of the parking lot will be reconfigured and restriped to allow larger parking spaces for the delivery vans, and neglected driveways will be resurfaced. New landscaping and trees will be installed throughout the site. The existing parking structure on the north side of the project site will not be altered.

Specific Plan Amendment

The project site is located within the boundaries of the West End Specific Plan (WESP). The WESP serves as the zoning document for the area surrounding the project and areas within the Plan boundaries. The proposed amendments to the WESP will include changes to the Use Matrix to add local trucking, storage and courier services as uses requiring a Conditional Use Permit in the Mixed Use (MU) zone within the Plan boundaries. This will allow the use of the site as a warehouse and distribution center with an approved Conditional Use Permit.

The Specific Plan Amendment also includes minor text “clean-up” changes throughout the document that do not affect the intent or provisions of the WESP. Changes are focused on ensuring the standards for the MU zone are not tied explicitly to the scope of the previously proposed mixed-use project for the site approved in 2017. The current applicant recently acquired the property, and the former proposal for a mixed-use complex is not moving forward at this time.

9. Surrounding Land Uses and Setting:

North of the site are business park buildings. The site is bordered by the 118 Freeway to the south with a hotel/retail complex beyond. To the west is Madera Road with the Simi Valley Landfill and Recycling Center beyond. Business park buildings are located to the east.

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 24, 2020

12. A site inspection was performed on:

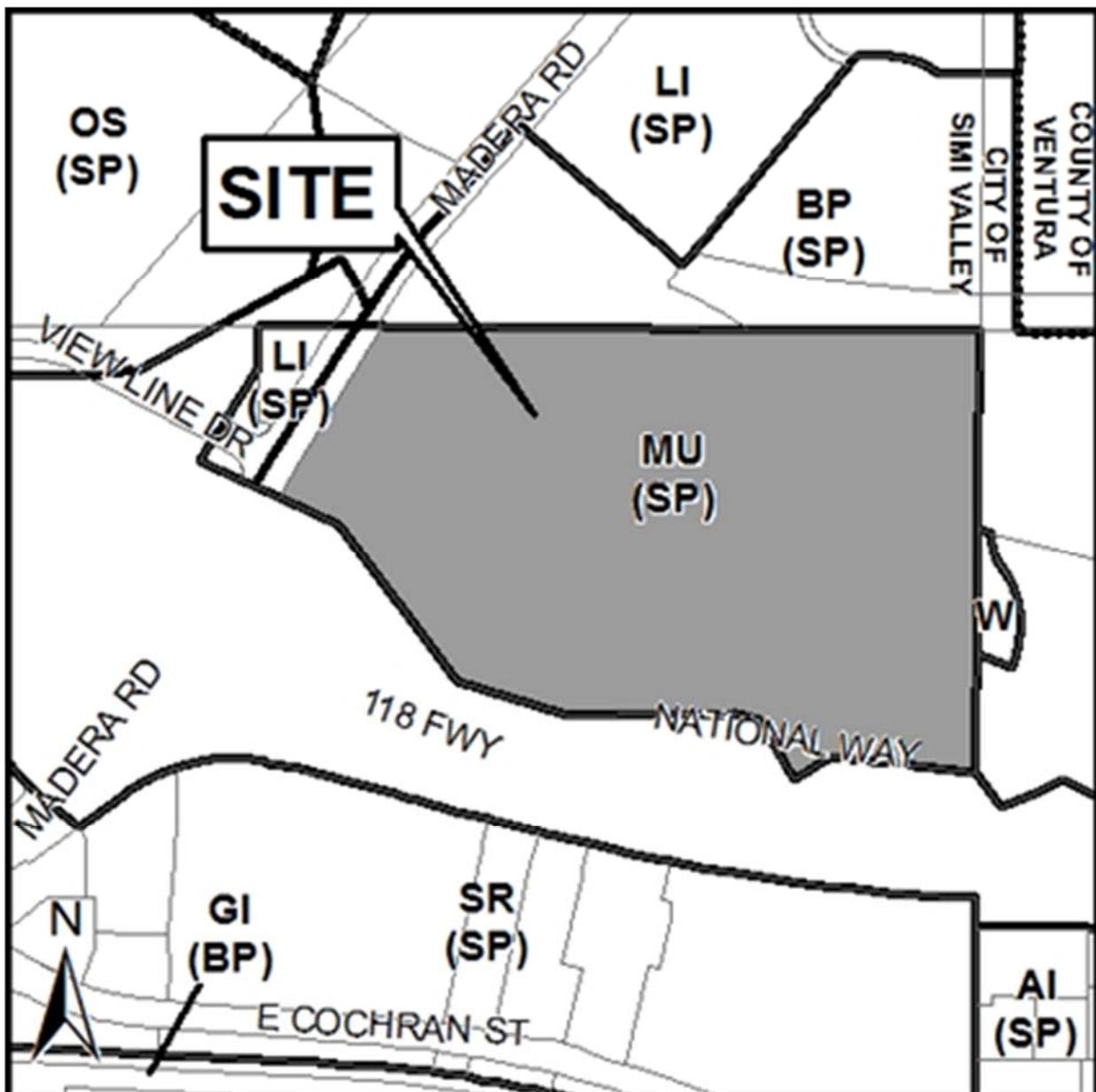
Date: June 24, 2020

By: Monica Dionne, Associate Planner

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

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

14. Location Map



15. Aerial Photograph



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:

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

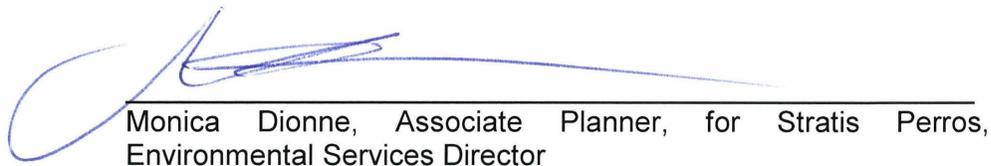
DETERMINATION:

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:

9/28/20
Date



Monica Dionne, Associate Planner, for Stratis Perros,
Environmental Services Director

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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- 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))?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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- d) Result in the loss of forest land or conversion of forest land to non-forest use?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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- 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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(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 are designated as Urban and Built-Up Land, and therefore is not subject to a Williamson Act contract. 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 on a previously graded developed site, 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Ventura County Air Quality Assessment Guidelines (Ref. #3), prepared and released by the Ventura County Air Pollution Control District (VCAPCD), is an advisory document that provides a framework for preparing air quality evaluations for environmental documents required by CEQA. Within the Guidelines, Chapter 4 discusses criteria for determining a project's consistency with the Ventura County Air Quality Management Plan (AQMP) (Ref. #4). Ventura County is currently designated as nonattainment for ozone on a state and federal level. The objective of the Ventura County AQMP is to outline a strategy for achieving attainment status by reducing emissions of chemicals that form ozone that are released by mobile and stationary sources. The analyses of emissions forecasts supporting the AQMP documentation are based on assumptions regarding population growth.

ROC and NOx are emitted by mobile and stationary sources associated with land use development projects. When exposed to sunlight, the photochemical reaction results in formation of smog, including ozone, which is a criteria air pollutant (CAP) regulated under both the National and California Ambient Air Quality Standards. The City of Simi Valley uses

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VCAPCD's Air Quality Assessment Guidelines' ("VCAPCD Guidelines") recommended significance thresholds for projects proposed in Ventura County. Under these guidelines, projects that generate more than 25 pounds per day (lbs/day) of ROC or NOx are considered to individually and cumulatively jeopardize attainment of the federal O3 standard and thus have a significant adverse impact on air quality.

The Air Quality study prepared for the project (Ref. #6) addressed potential emissions from construction and operation of the project. The study utilized the California Air Resources Board CalEEMod, Version 2016.3.2, air quality analysis program to calculate emissions. Because the proposed project would consist of the redevelopment of an existing site, this impact analysis focuses on the net increase or decrease in emissions from the proposed project when compared to those from the existing office land use. The analysis concluded that the project would potentially generate 1.6 fewer pounds per day of ROC and 23.3 more pounds per day of NOx when compared to the existing use. These quantities do not exceed the thresholds of 25 pounds per day of ROC or NOx.

The VCAPCD's 25 lbs/day emissions thresholds for ROC and NOx do not apply to construction because such emissions are temporary. Nevertheless, for construction impacts, the VCAPCD recommends mitigation if emissions of either pollutant exceed 25 lbs/day. According to the Air Quality Study prepared for the project (Ref. #6), construction emissions are estimated at 7.3 lbs/day of ROC and 20.9 lbs/day of NOx, and thus would not exceed the recommended thresholds.

Chapter 4 of the Air Quality Assessment Guidelines states that a project is consistent with the AQMP if the current population does not exceed the AQMP forecasted population for January 1st of the following year. The current population (2019) for Simi Valley is 125,613 based on the United States Census Bureau population estimate. The 2035 forecasted population for the City is 136,700, based on the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy growth forecast (Ref. #7). The population rise between 2019 and 2035 would be 11,087. The Air Quality Analysis provided for the project states the proposed warehouse/industrial use would employ approximately 330 people. An extremely conservative approach estimates that, if all newly hired employees would be relocating with their families from outside Simi Valley, the City's population could potentially increase by approximately 980 people. However, the report concludes that it is much more likely that many of the new employees would be primarily sourced among the local employment population. In addition, there would be substantially fewer jobs associated with the proposed warehouse/distribution as compared to the number of jobs associated with the current office land use, which is estimated at approximately 1,900. Thus, any population increase associated with the proposed land use would be minimal and not lead to exceedance of the population projections for 2035. Therefore, there would be a less than significant impact to the environment due to the project conflicting with or obstructing 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?

In addition to project-specific thresholds, Section 3.3.1 of the AQMP 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 ROC or two pounds per day or greater of NOx that is found to be inconsistent with the AQMP will have a significant cumulative adverse air quality impact" (Ref. #4). According to the VCAPCD Guidelines, to be consistent

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with the AQMP, a project must conform to the local general plan and must not result in or contribute to an exceedance of the County’s projected population growth forecast. As discussed above, the potential increase in population generated by the proposed project would be minimal and not significantly contribute to an exceedance of the population projections for 2035. Therefore, the project would not have a significant impact on 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?

Sensitive receptors are defined by the VCAPCD as “facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses.” Examples of sensitive receptors include residences, schools, hospitals, and daycare centers. The nearest sensitive receptors are single-family residences located approximately 0.4 miles east of the project site.

The project’s Air Quality study evaluated the potential for project construction and operations to expose off-site sensitive receptors to applicable substantial pollutant concentrations, including fugitive dust and other Toxic Air Contaminants (TACs) such as localized diesel particulate matter (DPM). Given that the proposed land use consists of warehousing/distribution, project operations would not emit substantive TACs identified by VCAPCD or California Air Resources Board (CARB) recommendations. To address generation of TACs during construction of site improvements, the project would be required to implement any applicable measures listed in the West End Specific Plan EIR (Ref. #8) relating to fugitive dust, including: regular ground wetting of graded areas; reduction of vehicle speed in unpaved areas; sweeping of accumulated silt on roadways; and face masks to be worn by those involved in ground-disturbing operations.

Localized DPM emissions would be minimal and temporary during construction. In addition, the project would comply with the CARB’s Airborne Toxic Control Measures (ATCM)’s anti-idling measure, which limits idling to no more than five minutes at any location for diesel-fueled commercial vehicles. The project would also comply with the required and applicable Best Available Control Technology and the In-Use Off-Road Diesel Vehicle Regulations.

However, the project Air Quality study states that the nearest sensitive land use is a residential complex located approximately 2,000 ft. (or 0.4 mi.) east of the project site, and, according to the ARB Quality Land Use Handbook (Ref. #9), there is a 70% drop off in particulate pollutions levels at 500 ft. Given the distance, drop-off rate, and the temporary nature of project construction, TAC exposure risks to the nearest sensitive land use are anticipated to be well below established thresholds. Therefore, the project would not have a significant impact in exposing sensitive receptors to substantial pollutant concentrations.

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

The Ventura County AQMP identifies uses that may require mitigation due to the potential to generate substantial odors. These include: wastewater treatment facilities, sanitary landfills, solid waste transfer stations, composting facilities, asphalt batch plants, painting and coating operations, fiberglass operations, food processing facilities, coffee roasters, commercial charbroiling, feed lots/dairies, petroleum refineries, chemical manufacturing, green waste

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and recycling operations, wastewater pumping facilities, mushroom farms, petroleum extraction, rendering plants, and metal smelting plants (Ref. #4).

The proposed project does not include any of these uses or activities. In addition, the project would be required to comply with Ventura County Air Pollution Control District Rule 51 (Nuisance), which restricts the exposure of adjacent properties to odor and particulate emissions. Therefore, 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?

(a-f) Based on a site visit by the environmental planner, the property is within a developed area of the City, on a previously graded developed site. 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 an impact on biological resources.

According to the tree report prepared for the project (Ref. #37), the project site contains 155 mature trees, eight of which would be removed for site improvements. The trees to be removed consist of two California Peppers, two Red Iron Barks, an American Sweetgum, an American Sycamore, a California Redwood, and a Carrotwood. The project will be required to provide replacement trees with a value equal to that of the removed trees. Therefore, the project would not conflict with the City's Tree Preservation Ordinance.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?
- c) Disturb any human remains, including those interred outside of formal cemeteries?

(a-c) The subject property has been previously graded and developed, and all proposed activities will be located on disturbed ground. This original grading and site development likely would have destroyed any existing historical/archaeological resources or human remains that may have been present. No utility work will be conducted on undisturbed or native soils. The proposed project involves minimal grading of the site, primarily to create a new van loading area along the south side of the existing building and a new interior driveway connecting the van loading area to an existing driveway on site. The property is not listed in the Ventura County Historical Landmarks and Points of Interest (Ref. #10). Therefore, there is a less than significant impact to the environment from a substantial adverse change to historical resources, archaeological resources, or disturbance of human remains. (Refer to Section XVIII. "Tribal Cultural Resources" section of this report for discussion of potential impacts and a mitigation measure specific to Tribal Cultural Resources.)

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) According to the Energy Analysis section of the Air Quality study prepared for the project (Ref. #6), the proposed construction would use fossil fuels to operate vehicles and other energy-consuming equipment. However, state regulations would apply regarding idling and proper maintenance of vehicles, and contractors/owners would have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. The energy analysis also concludes that project operations would result in a net decrease in annual VMT and transportation fuel consumption, as well as annual electricity and natural gas consumption when compared to the existing office building use.

In addition, as part of the General Plan update, the City 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.)

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Simi Valley has also adopted an Energy Reach Code, which includes 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 City's Water Conservation Program Ordinance (Ordinance 1142) will reduce water consumption within the City of Simi Valley through conservation, effective water supply planning, and prevention of waste, and will maximize the efficient use of water within the City. 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 also 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 adoption of Ordinance 1167 goes further by including a California Energy Commission (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 Alquist-Priolo Earthquake Fault Zoning Map (Ref. #12), 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 no potential for a 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 Geotechnical Report prepared for the project (Ref. #40), 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 improvements, 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. Therefore, there is no potential for a significant impact to the environment from strong seismic ground shaking.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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iii) Seismic-related ground failure, including liquefaction?

The geotechnical report for the property (Ref. #40) determined that the site is not located in an area designated to be susceptible to liquefaction. The report also concludes that, due to the shallow depths of bedrock and lack of groundwater, the potential for liquefaction or seismically-induced settlement is not considered a hazard at this site. Therefore, there is no potential for a significant impact to the environment from seismic-related ground failure.

iv) Landslides?

The geotechnical report prepared for the project determined that a portion of the site is located within a State-designated Seismic Hazard Zone for Earthquake Induced Landslides (Ref. #11). However, the report states that the proposed improvements are not anticipated to adversely impact the existing cut and fill slopes and thus the potential for slope instability is considered low. Therefore, there is a less than significant impact to the environment from landslides.

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

The project would consist of construction of a canopy structure, reconfiguration of portions of the parking lots, new interior driveway, and new landscaping, as well as replacement of missing landscaping throughout the site, which will all serve to lower the amount of exposed soil that could be eroded. In addition, the project is required to adhere to Section 9-64.030.C. (Grading & Erosion Control) of the Simi Valley Municipal Code. The purpose of this code is to prevent siltation, protect off-site properties, 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 study of the property (Ref. #40) evaluated the suitability of the site soils for the proposed improvements. The report states that the site is suitable for the proposed improvements, 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. 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?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site is already connected to the existing sewer system, and the use of septic tanks or alternative wastewater disposal system is not proposed. 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?

The subject property was previously graded and developed, and all proposed construction will take place on disturbed ground. Any paleontological resources that may have been present were likely destroyed during development. In addition, there are no unique geologic features on site. Therefore, there is a less than significant impact to the environment from direct or indirect destruction of a unique paleontological resources or site 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 VCAPCD regarding 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 utilizes VCAPCD 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 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 is 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. Per the Air Quality & Greenhouse Gas Analysis submitted for the project (Ref. #6), the annual GHG emissions associated with construction of the project is estimated at 158 MTCO₂e/year, and the net GHG emissions for project operations is 227 MTCO₂e/year lower than those that would be generated by the existing office use. Combined, project construction and operational emissions total to less than the SCAQMD screening threshold for non-industrial projects of 3,000 MTCO₂e/year.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 GHG 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, as well as water use measures to reduce water demand by 20 percent. This 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 are 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, and improvements 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, and prevention of waste, as well as maximizing the efficient use of water within the City. 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.

The GHG study prepared for the project also analyzed the project's consistency with the State's AB 32 Scoping Plan and SB 32 (California Global Warming Solutions Act) 2017 Scoping Plan Update measures, and concluded that, while many of the measures are not applicable, the project is consistent with all applicable strategies, including but not limited to: energy efficiency, potential for solar roofing, the State Energy Code, recycling and waste, water efficiency, improving freight system efficiency, and reducing Short-Lived Climate Pollutants (SLCP).

Based on all of the above information, the project would have a less than significant impact with respect to GHG emissions or conflicting 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?

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

(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. #13). Storage of any amount of hazardous materials is also 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, the proposed warehouse/distribution use is not expected to involve the transport, storage, or use of 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?

The project site is not listed on the California Environmental Protection Agency, Department of Toxic Substances Control, Envirostor Site Mitigation and Brownfields Reuse Program Database (Ref. #19). 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?

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?

There is direct access to the site from Madera Road for emergency response organizations, and the property is already included in the City's emergency response and evacuation plan. The existing developed property has already been incorporated into these plans and the proposed improvements will not affect 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?

While the developed 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. #15: Figure S-2, pg. 8-9), portions of the site are adjacent to natural hillsides and the site is located within a CalFire-recommended Very High Fire Hazard Severity Zone (Ref. #41). However, the addition of a metal canopy structure, loading doors, new internal driveway, and parking lot reconfiguration are not expected to increase the severity of wildfire risk. However, the project will be required

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to comply with Ventura County Fire Protection District Form #126 standards prior to obtaining any building permits for the site. Therefore, there is a less than 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 developed site is already connected to the existing sewer system and any wastewater is currently being collected and processed at the City’s sanitation plant. The project includes a reconfiguration of portions of the existing parking lots consisting of demolition of several existing parking islands and creation of new parking islands and striping. According to the Stormwater Management report prepared for the project (Ref. #38), the proposed site improvements have been evaluated to meet or exceed the standards of the Ventura Technical Guidance Manual (TGM) for Stormwater Quality Control Measures. The report states that the site is served by existing stormwater inlets and conveyance system, and that the effects of losing a proposed 0.01 acre of pervious area draining would have a negligible effect on the existing system. Several proposed vegetated swales will treat runoff from the new impervious areas.

According to the Stormwater Management report for the project (Ref. #38), the proposed area of disturbed green space on the site is approximately one acre; however, approximately one acre of green space will be created to compensate for the loss due to the reconfiguration of the site’s landscaping. Five acres of previously untreated runoff will be treated in one of six vegetated swales. The new swales will be designed in compliance with the Ventura TGM.

The project will also meet the requirements of the latest Stormwater Quality Urban Impact Mitigation Plan (SQUIMP). In addition, any 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 no potential for a significant impact to the environment from violating any water quality standards or waste discharge requirements.

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

The project would receive its domestic water supply from the existing distribution system. There is no proposal to use a well or groundwater from the site. 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?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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According to the Stormwater Management report (Ref. #38), on-site drainage will be directed to a combination of the existing underground storm drain system as well as new vegetated swales. Part of the proposed project also involves installation of replacement landscaping on site that has not been maintained. There would be less exposed soil after project completion than existing conditions. 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?

The City requires projects to provide a minimum of 1,100 cubic feet of detention per acre of developed area. According to the Stormwater Management report (Ref. #38), the project will both maintain and provide additional stormwater detention systems on site that will meet the City's detention requirements of 1,100 cf/acre. 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 Stormwater Management 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 stormwater drainage systems or an increase in polluted runoff.

- iv. Impede or redirect flood flows?

According to the Storm Water report for the project (Ref. #38), the project will drain into a series of onsite drain inlets and vegetated swales, and then enter the existing stormwater management basin that runs parallel to Madera Road and Brea Canyon Road. The report states that the net addition of 0.01 acres of pervious area makes the effects to the existing drainage basin negligible. Therefore, there is a less than significant impact to the environment from impeding or redirecting flood flows.

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

The project site is not within an area subject to a 100-year flood hazard area (Ref. #22). The site is not located near a large body of water that would produce seiches (seismically induced waves) or 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?

The City requires projects to provide a minimum of 1,100 cubic feet of detention per acre of developed area. According to the Storm Water report (Ref. #38), the project will provide stormwater detention basins on site that meet the City's requirements. In addition, the project

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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will meet the conditions of the City's National Pollutant Discharge Elimination System (NPDES) permit, as well as the requirements of the latest Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) to ensure the final site design meets 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 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 biological resources, stormwater runoff, air quality, noise, and traffic generation. The proposed West End Specific Plan Amendment allowing a warehouse/distribution use in the Mixed Use Zone with a Conditional Use Permit will also be compatible with the adjacent Business Park and Light Industrial zones by providing a variety of goods and services within close proximity to each other. The proposed land use complies with all applicable Development Standards specified in the West End Specific Plan for the MU zone, including setbacks, height, landscaping and parking, and meets the objectives of both the Business Park land use designation and the Specific Plan's purpose. All performance standards will continue to apply to this and future development. 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) 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 the existing weathered bedrock that makes up the soil onsite aside from sand and gravel for concrete aggregate, and there are no mineral resources in the existing engineered fill (Ref. #26, 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 Fields Map (Ref. #27). 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. #28). 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

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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?

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

(a-b) The project site is not adjacent to any noise- or vibration-sensitive land uses. In addition, no outdoor industrial activities are proposed with the new land use. Parking lot reconfiguration, driveway creation, and addition of a canopy to an existing building are not expected to cause excessive noise or vibration that would affect noise-sensitive land uses as identified in the General Plan. Therefore, there is a less than significant impact to the environment resulting from the generation of a substantial temporary or permanent increase in ambient noise levels, or of excessive groundborne vibration or 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

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 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.

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. The project would not add any new public infrastructure. The project will replace the existing office use with a warehouse/distribution use that is expected to employ substantially fewer people than would be employed under the existing office use. Therefore, there is a less than significant impact to the environment from substantial population growth in the area.

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

There are 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.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. PUBLIC SERVICES:

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

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

The property is located less than two miles from Ventura County Fire Protection District Station Number 45, located at 790 Pacific Avenue, in Simi Valley. 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 arriving in 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. Therefore, there is no potential for a substantial impact associated with new facilities or personnel related to police services.

The need for public facilities is based on the demand generated by the population. Since the project is not expected to result in a significant population increase, there would be a less than significant impact on public services or facilities, including fire protection, police protection, schools, parks or recreational facilities.

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?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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(a-b) Existing park facilities would be able to accommodate any increase in park use generated by this project. No new community recreational facilities or expansion of existing community facilities are required 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?

The project has been reviewed by the City’s Traffic Engineering Division and it has been 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.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Beginning July 1, 2020, CEQA analysis for determining potential significant transportation impacts from vehicles transitioned from an automobile delay or capacity measure to a Vehicle Miles Traveled (VMT) metric in evaluating a project’s environmental impacts under CEQA as required by Senate Bill (SB) 743. Traffic Impact Studies using methodologies and determination based on measures of vehicle delay or congestion are no longer applicable for CEQA transportation analysis. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts, shifting away from the level of service analysis that evaluated a project’s impacts on traffic conditions on nearby roadways and at intersections.

The State Office of Planning and Research (OPR) Technical Advisory identified project conditions to be reviewed at the CEQA Checklist stage to determine if a project can be presumed to have a less than significant CEQA transportation impact or if further analysis is required. CEQA Lead Agencies, such as the City, would have discretion to approve a project applicant’s conditions for a presumption of less than significant transportation impacts. The City’s screening criteria to determine if projects may be exempt from a VMT Analysis include, but are not limited to, the following:

- Projects that generate fewer than 110 trips per day (net) as calculated using Trip Generation
- Standalone retail projects less than 10,000 s.f. in gross floor area located within neighborhoods
- Projects with 100% affordable residential

The Trip Generation Assessment prepared for this project (Ref. #39) calculated that the proposed warehouse/distribution use would generate 2,407 average daily trips, which equates to 618 fewer net trips than would be generated by the existing office use estimated at 3,025 average daily trips. Since the net trips per day generated by this project are less than 110 trips per day, the City’s Traffic Engineer has determined that the proposed project is exempt from the City’s Screening Criteria for a VMT Analysis. Therefore, this project would

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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have a less than significant impact on the environment due to a conflict or inconsistency with CEQA Guidelines Section 15064.3, subdivision (b).

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

The Simi Valley Municipal Code 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 proposed improvements and determined that those standards would still be satisfied. Compliance with those design standards protects against the possibility of creating a substantial hazard due to a design feature. However, the project is not proposing any alterations to the existing access driveways or surrounding roadways. 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?

The proposal will not alter the existing access to the developed site. The City's Traffic Engineering Division has determined the existing access design complies with Municipal Code 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
-
- 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.

(a-b) The project site has been previously graded as part of the development of the existing office building, and all proposed activities will be located on previously disturbed ground. However, to comply with State laws SB18 and AB52, the City invited local interested tribes to consult on the project. The Fernandeano Tatavium Tribe of Mission Indians (FTBMI) requested consultation, as a result of which the tribe found the project area to be sensitive for Tribal Cultural Resources. The FTBMI representative expressed concern that previously unidentified Tribal Cultural Resources may be inadvertently impacted by proposed ground

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disturbing activities. Therefore, the applicant has incorporated the following mitigation measure recommended by the FTBMI into the project:

- Applicant shall, in good faith, consult with the Fernandefio Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during project grading. (Contact Phone: (818) 837-0794; Email: thcp@tataviam-nsn.us).

Therefore, with incorporation of the above mitigation measure, 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 developed site is collected by the existing sewer system, and treated at the City’s wastewater treatment facility. The proposed change in land use and site improvements are not expected to increase wastewater discharged from the site or water demand. 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 is provided to the project site by Southern California Edison (SCE), and natural gas is provided by SoCal Gas. Telecommunications are generally available in the project area, and facility upgrades would not be necessary due to the proposed site improvements. Therefore, there is a less than significant impact on the environment from the project requiring or resulting in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities.

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

The developed project site is currently served by the Ventura County Waterworks District No. 8 (District). Calleguas Municipal Water District (Calleguas) supplies most of the District’s water. The District also extracts groundwater for treatment and use as potable water and for use as untreated nonpotable water, and purveys recycled water. New or expanded entitlements of water supplies are not needed for this project.

The District’s most recent Urban Water Management Plan forecasts demand of 27,975 acre-feet per year (AFY) in 2035, which is essentially the build-out demand of the District under the current City of Simi Valley and County of Ventura General Plans. The project is consistent with the Simi Valley General Plan. Calleguas’ current Urban Water Management Plan assures that the demands of all purveyors they serve, including the District, can be met through 2035 in all but the most extreme circumstances. In addition, the District plans to diversify resources by increased local water production and water recycling.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 is collected by the existing sewer system, and 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. Office uses are considered to be 0.33 EDUs per 1,000 s.f. vs. a warehouse use at 0.08 EDUs per 1,000 s.f. Based on this difference, the proposed warehouse use would produce significantly less wastewater than its most recent use as an office building. 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?
-
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?
-

(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. #33). 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?
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Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- 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) Portions of the developed site are adjacent to natural hillsides, and, while the site is not identified as a potential wildfire hazard area on the Fire Hazard Map in the City's General Plan (Ref. #15: Figure S-2, pgs. 8-9), the site is identified as a CalFire-recommended Very High Fire Hazard Severity Zone (Ref. #41). Although the addition of a metal canopy structure, new internal driveway, and parking lot reconfiguration are not expected to increase the severity of wildfire risk, the project will be required to comply with Ventura County Fire Protection District Form #126 standards prior to obtaining any building permit for the new canopy structure. Therefore, there is a less than significant potential for a significant impact to the environment from exposure of people or structures to 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. (Biological Resources), there are no rare or endangered species present within the project envelope, and the site is not suitable habitat for any wildlife species or community. Since the project is within the urbanized area of the City, is substantially surrounded by development, and has been previously graded, improvements 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 Sections V. (Cultural Resources) and XVIII. (Tribal Cultural Resources), there are no historic structures on site, and because the site was previously graded, no cultural resources are likely to remain on the site. However, a mitigation measure has been included that requires tribal notification in the event tribal cultural resources are encountered during ground-disturbing activities. Therefore, the project will have no 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?)

Based on the answers to Section III (Air Quality), according to the Ventura County Air Pollution Control District (VCACPD) 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 VCAPCD (Ref. #3: Pg. 4-6, Sec. 4.2.3.1), consistency with the AQMP can be determined by comparing the current

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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. Since the current population of Simi Valley (125,613) plus the minimal projected growth from this project is less than the SCAG population forecast of 136,700 for the year 2035, the proposed project is consistent with the AQMP. Therefore, there is a less than significant cumulative impact on air quality.

Based on the answers to Section XVII. (Transportation and Traffic), since the net trips generated by this project are less than 110 per day, the City's Traffic Engineer has determined that the proposed project is exempt from the City's Screening Criteria for a VMT Analysis. The Traffic Engineer also determined that the project would not affect existing streets or intersections. Therefore, there is a less than significant cumulative impact on traffic and transportation.

Based on the answers to Section X. (Hydrology and Water Quality), every project, including this development, is required to comply with the Countywide National Pollution Distribution Elimination System (NPDES) Permit. This includes submitting stormwater drainage designs that comply with the Ventura Countywide Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) and calculating the Stormwater Quality Design Flow and 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 stormwater 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 AQMP, the NPDES Permit, and the City's VMT thresholds 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 and 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 Section III. (Air Quality), the project would not have a significant impact due to pollution, inconsistency with the AQMP, exposure of sensitive receptors to significant pollution concentrations, or odors. Based on the answers to Section X. (Hydrology and Water Quality), the project would not have a significant impact due to erosion, flooding, or polluted runoff. Based on the answers to Section IX. (Hazards and Hazardous Materials), 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 Section VII. (Geology and Soils), the project would not have a significant impact due to surface rupture, seismic ground failure, or landslides. Based on the answers to Section XIII. (Noise), the project would not have a significant impact on the environment due to the exposure of sensitive receptors to noise levels in excess of standards established in the General Plan, or a substantial temporary or periodic increase in ambient noise levels. Therefore, there is a less than significant impact to the environment from effects which will cause direct or indirect substantial adverse effects on human beings.

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

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