MEMO

DATE: December 5, 2024

TO: Planning Commission

FROM: Joe Pearson II, AICP, Planning and Environmental Services Manager
Brian Yanez, Assistant Public Works Director

SUBJECT: **Project Name: Oxnard Sand Management Plan -** Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - A request for a Coastal Development Permit to implement a Sand Management Plan for the coastal areas generally within the Oxnard Shores community. The project includes collecting wind-blown beach sand from beach access points, sidewalks, streets, and walkways and redepositing the sand back onto the beach at 13 locations. The project is exempt from environmental review pursuant to Section 15304 of the CEQA Guidelines. Filed by Brian Yanez, Assistant Public Works Director on behalf of the City of Oxnard.

Recommendation:

That the Planning Commission Continue the Oxnard Sand Management Plan item to the Planning Commission hearing date of February 20, 2025.

Background:

The Sand Management Plan (SMP) is a maintenance plan that incorporates coastal areas of Oxnard facing severe wind events that cause beach sand to accumulate on the public beach access points, leading to conditions on streets, sidewalks, walkways, and parking lots that should be mitigated. To address this issue, a SMP is needed to provide access to public beaches, general maintenance of City property, and provide viable access for vehicles and pedestrians within the City's rights-of-way. The SMP proposes day-to-day maintenance and the redepositing wind-blown sand back onto the beach from these areas.

The City Public Works Department with assistance from Rincon Consultants, Inc. (Rincon) has prepared this SMP to support a Coastal Development Permit (CDP) being processed by the City of Oxnard Planning Division pursuant to the City of Oxnard Local Coastal Program, and appealable to the California Coastal Commission (CCC). This SMP is a maintenance plan and presents the management of wind-blown sand to be redeposited onto the beach.

Since the Planning Commission meeting of October 17, 2024, Public Works (PW) staff has been addressing items from public comment. PW staff met with residents on Mandalay Beach Road regarding a City-owned parcel not identified on the Sand Management Plan (SMP), worked with Rincon Consultant, Inc. to discuss the SMP amendment to include the parcel, and conducted a site visit.

Staff has also received several emails from coastal residents regarding the dunes and sand accumulation on the beach. These residents are requesting the dunes be addressed in the SMP. The SMP is a maintenance plan for the public right-of-way and is not intended to address dune restoration or maintenance. While the purpose of the SMP is not to address long term dune maintenance, the City has kicked off the Local Coastal Program (LCP). The amendment of the City's LCP will address a range of issues including California Coastal Commission (CCC)'s new SLR policy guidelines, the Coastal Act, environmental conditions, housing policies, coastal protection regulations, as well as other applicable State of California's laws and development protocols. Those coastal residents concerned about long term dunes maintenance are encouraged to participate in the City's LCP process, as the LCP may provide a pathway to address some of their concerns. The City has scheduled a public community meeting on December 9, 2024 at the Oxnard Main Library (Room A) from 6:00PM to 8:00PM. The upcoming LCP Community meeting will update and share input on initial assessments of coastal vulnerabilities, along with preliminary options for adaptation measures. However, it is important to note that long term dune management is a significant evolving issue that will require time and coordination with multiple stakeholders.

Once the SMP amendment is completed City staff will share the amended SMP with the CCC staff. After the CCC review of the SMP, staff will reach out to the interested parties to share the amended SMP and bring it back to the Planning Commission. With the additional work for SMP amendment and engaging the CCC staff's review, it has been decided to continue the public hearing for the Oxnard Sand Management Plan to a date certain of February 20, 2025, Planning Commission meeting.

For the convenience of the Planning Commission and interested parties attached to this memo are the following documents originally prepared for the Planning Commission's public hearing on October 17, 2024 as well as written public comments received addressed to the Commission.

1. Staff Report and associated attachments.

2. Written Public Comments.

The staff report and other attachments have not changed. Additionally, the required Measure M pre-recorded presentation video has not been changed, and it can be viewed online at this address: https://youtu.be/KA08MOVqi10

CITY OF OXNARD CALIFORNIA

PLANNING COMMISSION
STAFF REPORT

TO: Planning Commission

FROM: Joe Pearson II, AICP, Planning and Environmental Services Manager

DATE: October 17, 2024

SUBJECT: **Project Name: Oxnard Sand Management Plan**; Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) to implement a Sand Management Plan for the coastal areas generally within the Oxnard Shores community located West of Harbor Boulevard, South of Fifth Street, North of Channel Islands Boulevard, and approximately 400 feet east of the Pacific Ocean, within the City of Oxnard.

1) Recommendation: That the Planning Commission ("**Commission**"):

a) Find the Project to be Categorically Exempt from environmental review pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15304 (Class 4, Minor Alterations to Land); and

b) Adopt Resolution 2024-XX approving Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit), subject to certain findings and conditions.

2) Project Description and Applicant: A request for a Coastal Development Permit to implement a Sand Management Plan for the coastal areas generally within the Oxnard Shores community. The coastal areas in the city of Oxnard experience severe wind events that result in wind-blown beach sand accumulating on vacant private lots and public beach access points (access points). The accumulated sand moves from the vacant lots and access points to streets, sidewalks, walkways, and parking lots resulting in slippery and unsafe conditions for motorists and pedestrians. The project includes collecting wind-blown beach sand from beach access points, sidewalks, streets, and walkways and redepositing the sand back onto the beach at 13 locations. The sand would be redeposited and groomed over the entire sand placement area to a maximum depth of less than six inches above the existing elevation. The sand placement areas have been identified to accommodate the amount of sand expected to be redeposited. The implementation of the project is anticipated to occur monthly but will depend largely on wind velocity and storm frequency.

For the purposes of this Staff Report, the foregoing project description shall be referred to as the **"Project."** Filed by Brian Yanez, Assistant Public Works Director on behalf of the City of Oxnard (the **"Applicant"**).

Please see the Sand Management Plan (Attachment A) for more details.

3) Existing & Surrounding Land Uses: The project area generally includes Oxnard Shores area extending from West 5th Street to the north and West Channel Islands Boulevard to the south within the City of Oxnard Jurisdiction. The project area is generally developed with residential, hotels, parks, public parking, and streets. The entire project site is within the Coastal Zone and the California Coastal Commission (CCC) appeals jurisdiction

4) Background Information: The City Public Works Department (PW) has historically removed wind-blown sand from streets, sidewalks, walkways, and parking lots and trucked to an off-site landfill. The amount of sand removed from public areas varies from season to season due to natural causes, such as wind, king tides and severe storms. In the first quarter of 2022 (January through March), the City tracked the amount of sand removed from streets, sidewalks, walkways, parking lots, and access points and the total sand removed from all areas. Based on that tracking it is estimated that the City is removing between 3,000 and 5,000 cubic yards.

5) Environmental Determination: In accordance with Section 15304 (Class 4, Minor Alterations to Land) of the State of California Environmental Quality Act (CEQA) Guidelines, projects involving "minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes" may be found to be exempt from the requirements of CEQA. This proposed Project meets the requirements of a Class 4 Categorical Exemption because it consists of removal of relatively moderate quantities of sand from existing developed streets, walkways, parking lots, and beach access points within coastal adjacent areas, and redeposited on the beach. Equipment used in the movement of the sand to be deposited will remain above the high tide line and will not enter the water and the placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species. The equipment will use existing beach access points, currently used for other beach maintenance activities, so there is not a need for creation of new access points. A Biological Resources Assessment report was prepared and found that there were no special status plants or wildlife species in the proposed areas of work. No new development or removal of native vegetation is proposed. Training shall be provided to all staff by a qualified biologist to ensure they are aware of the environment and follow all best practices. Based on review of the Biological Resources Assessment, no Exceptions to the Exemptions (Section 15300.2) apply to defeat the Exemption. Therefore, staff has determined that there is no substantial evidence that the project will have a significant effect on the environment and recommends that the Planning Commission direct the Planning & Environmental Services Manager to file the Notice of Exemption (Attachment B) with the Ventura County Clerk pursuant to Section 15062 of the State CEQA Guidelines within five (5) working days of passage, approval and adoption of the project.

6) Analysis:

a) General Discussion: The City is proposing a Sand Management Plan for managing windblown sand transport issues along public streets, parking lots, and access ways within the city. Due to consistent natural causes, such as wind, king tides, and severe storms, the City has determined the need for beach sand relocation and placement. The project will consist of sand removal activities from roadways, parking lots, sidewalks, pathways, trails,

and public access points, and will redeposit sand in designated placement areas. Sand removal, sand placement, access routes, additional work areas for grooming and litter removal are included as part of the project. The sand removal areas generally include the residential streets of West 5th Street, Mandalay Beach Road, Capri Way, Neptune Square, Marine Way, Oxnard Beach Park parking lot and Oxnard Shores parking lot. Additionally, sand will be removed from public beach access points, which are present between residential homes, and relocated approximately 50 to 200 feet west along the beach. The sand placement sites will be in designated areas on the beach west of each removal area. Access to the sand placement sites will be adjacent to various private homes in the northern portion of the project site and along existing accessways in the 'ololkoy (Oxnard) Beach Park area.

The redeposition process will occur during daylight hours and the frequency will be determined by a number of factors, including but not limited to, wind and storm events, and the number of people using public access locations and beaches. Wind and storm events generally deposit sand in public parking lots, walking paths, and streets. Based on current sand movement, on average walking paths are required to be cleared of sand two to three times per week, streets to be cleared monthly, and access to the sand placement areas will occur on the same day. Sand redeposition activities may be required outside of daylight hours if determined to be an emergency and may have an imminent threat on life and/or property. The project will involve the use of various heavy equipment.

Once the sand is removed from the street or public beach access points, the sand will then be redeposited back onto the beach at up to 13 locations. Heavy equipment will remain above the high tide line and will not enter the water and the placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species. Additional work areas that require grooming and litter removal will occur within two public beach areas at Neptune Square and 'ololkoy (Oxnard) Beach Park.

Access to the sand placement areas may include up to 14 separate access points to gain access onto the beach and an additional three locations at 'ololkoy (Oxnard) Beach Park for access only to provide trash service. The implementation of the project is anticipated to occur monthly but will depend largely on wind velocity and storm frequency. A portion of the project which includes hand sweeping ADA walkways at 'ololkoy (Oxnard) Beach Park and Oxnard Shores may occur two to three times per week. Sand removal activities will occur over a one-to-six-day period each month, depending on the amount of accumulated sand. The redeposition of sand will occur on the same day as the sand removal activities. Attachment A provides a summary of the individual project sites and total estimated work area.

b) General Plan and Local Coastal Program (LCP) Consistency: The project area primarily consists of land with a 2030 General Plan land use designation of Recreation Areas (REC) the remainder of the project area includes the adjacent streets, walkways and other areas in which sand will be removed. These areas to be cleared are generally intended to provide public access to coastal areas, as well as development in the area. The proposed project will not alter the use of the areas, and only involves the intermittent removal of sand and relocation to the designated beach areas and will result in improved public access; therefore, the project is consistent with the City's 2030 General Plan and complies with all applicable Coastal Land Use Plan Policies (see below consistency tables).

Consistency with the 2030 General Plan is defined by the relationship between 2030 General Plan policies and the proposed project. The three consistency classification levels are:

I. Direct Applicability to a Proposed Project or Program (full text of the policy and an explanation).

II. Related or Indirect Applicability to the Proposed Project or Program (policy title and an explanation for each or groups of related or indirectly related policies).

III. No or Distant Applicability to the Proposed Project or Program (all policies not listed as Level I and II are assumed to be consistent).

POLICY	LEVEL	POLICY OR TITLE	EXPLANATION
ICS-9.1	**I**	**Beach and Coastal Parking** Maintain and improve beach and coastal area access and parking that accommodate visitors while monitoring and protecting the impacts of parking on the natural environment and surrounding neighborhoods.	Implementation of the sand management plan will result in the clearing of public access ways and parking areas to allow for improved public access
ER-1.1	**I**	**Protect Oxnard's Natural and Cultural Resources** Protect the City's natural resource areas, fish and wildlife habitat, scenic areas, open space areas, parks, and cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible.	Project includes monitoring and educational requirements to ensure that natural resources are protected.
ER-2.3	**I**	**Promote Areas for Open Space** Reserve, preserve, and promote areas particularly suited for open space/recreational uses. Appropriate public access to these resources shall be preserved, enhanced, restored, and properly controlled	The sand management plan will allow for the preservation of public access areas and amenities to allow for continued public access to our coastal open space areas.
ER-2.4	**I**	**Design Review Process**	The siting of the area to redeposit sand has been

		Use the environmental and design review process to protect designated sensitive habitat, and promote open space.	carefully selected to ensure that habitat areas are not impacted.
ER-4.1	**I**	**Encourage Protection of Sensitive Habitat** Identify and encourage protection of sensitive habitat areas, with attention to habitat that may span small parcels.	The overall project includes possible habitat areas so the siting of the area to redeposit sand has been carefully selected to ensure that habitat areas are not impacted.
ER-4.5	**I**	**Planning in Sensitive Areas** Require careful planning of new development in or near areas that are known to have particular value for biological resources to maintain sensitive vegetation and wildlife habitat.	Project includes the removal of sand blocking beach access points, streets, and parking areas. This sand will be redeposited back on the beach. The areas for the redepositing of sand have been carefully sited to avoid any sensitive areas.
ER-8.3	**I**	**Coastal Sand and Habitat Management** Work with property owners and appropriate State and County agencies to manage beach sand distribution and quality while avoiding impacting animal and plant sand habitats	The sand management plan has been created in consultation with the California Coastal Commission, Oxnard City Staff, with input from adjacent property owners, to ensure the management avoids impacts to habitat areas.
All others	III	All policies not listed above	No or distant applicability to the proposed project.

In addition to being subject to the 2030 General Plan, the proposed development is subject to the Coastal Act and Local Coastal Plan. The applicable policies have been compared with the proposed project as follows:

Coastal Act Policies (CA) and Local Coastal Plan (LCP) Policies

POLICY NO.	POLICY	EXPLANATION
CAP 30240a	Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.	Project is designed to minimize disturbance and includes conditions to ensure habitat areas are protected and improve upon the public access.
CAP 30240b	Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.	
CAP 30250	New development shall be located within, contiguous with, or in close proximity to existing developed areas able to accommodate it.	The sand management plan was developed with a biological report and recommendations have been incorporated into the project description and conditions or approval. Educational requirements are included to ensure that the recommendations of the biological report are followed.
LCP 6(d)	New development adjacent to wetlands or resource protection areas shall be sited and designed to mitigate any adverse impacts to the wetlands or resource...When a development is proposed within an environmentally sensitive habitat or a resource procession area, or within 100 feet of such areas, a biological report shall be prepared within includes applicable topographic, vegetative and soils information. The information shall include physical and biological features existing in the habitat areas. The report shall be prepared by a qualified biologist, and shall recommend mitigation measures to protect any impacted resources. All recommendations shall be made in	

	cooperation with the State Department of Fish and Game. When applicable, restoration of damaged habitats shal be a condition of approval.	
CAP 30251 **LCP 37**	Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas to minimize the alteration of natural landforms, and to be visually compatible with the character of the surrounding areas. All new development in the coastal zone shall be designed to minimize impacts on the visual resources in the area.	Redeposited sand will be smoothed out to be no more than 6 inches above current grade to be visually compatible with the adjacent areas.
LCP 73	Adequate public parking shall be provided in all new development with dedicated public access areas, and shall be in addition to the parking required for the new development, unless adequate facilities are provided nearby. All facilities shall be located and designed to avoid impacts on surrounding residential areas.	The Sand Management Plan will result in the removal of sand build up within public parking lots to ensure spaces are available for public use.

The proposed Project complies with the above CAP and LCP policies and, as shown below, the Project is fully consistent with the development standards of the Coastal Zoning Ordinance which implements the above LCP policies.

c) Conformance with Zoning Development Standards: Pursuant to Section 17-57(B)(5) (Coastal Permit Procedures) of the Coastal Zoning Code, the proposed project is appealable to the California Coastal Commission, and is thus subject to the Planning Commission's approval of a Coastal Development Permit.

The proposed project does not include the construction of any new buildings or structures. The implementation of a sand management plan is subject to the policies of the coastal zoning ordinance. While no new uses or developments are proposed the management plan is consistent with the intent of the Coastal Recreation (RC) coastal zone, which is the area in which most of the proposed work would be taking place, as well as the adjacent residential and resort uses. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational

uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. The plan would also support the other permitted uses in the other adjacent zones by ensuring safe access is maintained to the existing developments. As conditioned, the Project is consistent with the Coastal Act policies and Local Coastal Plan policies that are applicable to the project.

d) Sand Management Plan: A Sand Management Plan (SMP) is needed immediately to maintain safe access to public beach areas while protecting fragile coastal resources. It will also provide safe access for vehicles and pedestrians along public streets, sidewalks, and beach access points and provide safe, reliable ADA access to public beaches. This SMP includes proposed sand management actions, namely the redeposition of wind-blown sand from streets, sidewalks, walkways, parking lots, and access points back to the beach. Only removal of accumulated sand along the public sidewalks and street will occur and no grading of private lots is proposed. Based upon the amount of sand removed in 2022 and in previous years, the City PWD proposes to redeposit approximately 5,000 cubic yards of sand back onto the beach annually. Once sand is redeposited back onto the beach, the sand will be groomed over the entire sand placement area to a maximum depth of less than six inches above the existing elevation. The sand placement areas have been identified to accommodate the amount of sand expected to be redeposited from nearby areas and placed above the highest high tide line demarcated by wrack or wetted sand, if no wrack is present. The placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species. The key component of the plan include the following:

- Access and Sand Removal Areas - These areas are access points where accumulated wind-blown sand builds up and may restrict pedestrian access to the beach. Sand may be relocated from these areas to the sand placement areas on the beach. Equipment and personnel will remove sand from these areas as well as use the areas for access to redeposit sand from streets and sidewalks at the sand placement areas.

- Sand Placement Areas - Sand removed from streets, sidewalks, walkways, parking lots, and access points will be redeposited in these areas. Equipment and personnel will use the access points to gain access to the sand placement areas. Large placement areas have been identified to accept sand from roadways and smaller areas directly west of access points have been identified to accept sand that has built up in access points.

- Sand Removal Areas - These are the residential streets and sidewalks of West 5th street, Mandalay Beach Road, Capri Way, Neptune Square, Marine Way, and Oxnard Beach Park, Oxnard Shores, and Channel View parking lots and associated ADA paths where wind-blown sand will be removed and redeposited in sand placement areas.

- Sand Source Sites - These are vacant private lots where wind-blown sand accumulates and migrates from the lots onto streets and sidewalks. Only removal of accumulated sand along the public sidewalks and street will occur and no grading of private lots is proposed.

- Work Areas - This area includes Neptune Square where the City is required to maintain recreational equipment for public use. Removal of trash and grooming of sand surrounding the recreational equipment is proposed in the area.

- Access Routes - Equipment will be required to travel from streets and through access points to the designated sand placement areas on the beach. The sand placement areas are approximately 50 to 200 feet west of the access points and the access routes will be 10 feet wide or less.

- Storm Drain Maintenance - Existing storm drains that convey storm water from residential areas require annual maintenance activities such as removing accumulated sand and ensuring there is a clear path for water flow such that the drains don't clog and flood residential areas.

As outlined in the SMP, the sand management plan was created in consultation with the California Coastal Commission staff to address any potential concerns. One of the concerns raised was possible contamination of the sand on adjacent roadways. To address the CCC comment relating to water quality, the City completed a Sand Contamination Study prepared by Rincon in April 2022. The purpose of sampling the sand was to evaluate the presence of potential contaminants of concern (COC) in wind-blown sand that has accumulated on streets, sidewalks, walkways, parking lots, and access points, and to determine if the sand that accumulates has COCs at concentrations that would prevent it from being suitable for placement back on the beach due to a potential impact to human health. Based on the results of the Sand Contamination Study, the sand samples collected and analyzed during the assessment did not have COCs at concentrations that would adversely impact human health and, therefore, the wind-blown sand that has accumulated on streets, sidewalks, walkways, parking lots, and access points appears to be suitable for placement back on the beach.

f) Project Area: The SMP is separated into five specific areas which include the following:

1. West 5th Street to Seabreeze Way - The most northern segment of the project includes the main public streets of West 5th Street and Mandalay Beach Road; a large undeveloped section of sandy beach adjacent to Mandalay Beach Road; six sand placement areas west of four access points ; and two undeveloped private lots (sand sources sites).
2. Seabreeze Way to Neptune Square - Area Two consists of Mandalay Beach Road south of Seabreeze way and includes Capri Way where the street dead ends at Neptune Square. This area includes four sand placement areas (0.22 acre) west of four access points (0.23 acre), and one placement area (0.37 acre) west of two access points (0.24 acre) associated with Neptune Square (2.33 acres). Two sand source sites are in this area adjacent to Capri way.
3. Neptune Square to 'ololkoy (Oxnard) Beach Park - Area Three is south of Neptune Square to Oxnard Beach Park. This area consists of Marine Way, two sand placement areas, one sand source site, two access points , and three access points for trash service only associated with Oxnard Beach Park.
4. 'ololkoy (Oxnard) Beach Park to Oxnard Shores - Area Four consists of Oxnard Shores parking lot, ADA paths, one sand placement area, and two access points. Sand removal

will occur in the Oxnard Shores parking lot, along the ADA paths , and at an access point to the beach. The sand will be redeposited at a sand placement area adjacent to the ADA paths. Sand accumulates along the ADA paths on a frequent basis and proactive sweeping is proposed in this area to limit the extreme buildup of sand on the pathways limiting public access to the beach. Approximately 300 to 500 cubic yards of sand will be redeposited in these areas.

5. La Granada to Channel Islands Harbor - The most southern area includes the parking lot adjacent to Channel Islands Harbor entrance. Sand accumulated in the parking lot and sidewalks will be redeposited at the sand placement area at the corner of West 5th Street and Mandalay Beach Road.

7) Community Workshop and Public Input: The Project site is generally located within the Oxnard Shores Neighborhood. On October 17, 2022, the Project was presented to the public during the City's Community Workshop meeting. Notices were mailed out to property owners. Approximately 2,000 meeting notices were mailed by the city, and the Project area was posted in two locations with Project details and Community Workshop information. During the meeting multiple comments were received by community members regarding the Project. The comments were generally supportive of the plan concept and purpose, however, there were concerns raised regarding potential sand fences, accuracy of the biological assessment, and the potential height of the sand in the redeposit areas. As a result of the concern the sand fences were removed from the proposal, so the plan does not include the construction of any new structures. Also, as noted in the SMP, the sand to be redeposited to be not more than 6 inches above the existing sand level at any time, so the sand would not mound up.

Consistent with public noticing requirements, the Planning Commission Hearing was advertised in the newspaper, with an on-site posting. Notices were also mailed to all property owners within the Oxnard Shores neighborhood and to property owners within 300 feet and residents within 100 feet of the neighborhood. To date, Planning Staff has not received any written comments from the public regarding the proposed project.

8) Appeal Procedure: In accordance with Section 17-58(J) of the City Code, the Planning Commission's action may be appealed to the City Council within 10 working days after the decision is made. Appeal forms may be obtained from the City Clerk and must be submitted with the appropriate fees before the end of the appeal period. If an appeal to the City Council is not filed within 10 working days of the Planning Commission's decision, the decision of the Planning Commission shall be considered final and a Notice of Final Action shall be filed on the 11th working day with the Coastal Commission.

Attachments:

A. Draft Oxnard Sand Management Plan
B. Notice of Exemption
C. Resolution (Coastal Development Permit)
D. Staff Presentation



City of Oxnard Sand Management Plan

prepared for

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May 2024

Table of Contents

Introduction 1
- Purpose 1
- Location 1

Background 3

Project Description 5

Project Site 7
- Schedule 10
- Equipment 10

Existing Conditions 12
- Physical Characteristics 12
- Chemical Characteristics 13

Minimization Measures 14

Conclusion 16

References 17

Tables

Table 1 Location and Amount of Sand Removed from Public Areas 4
Table 2 Project Area Estimates 8

Figures

Figure 1 Regional Location
Figure 2 Area One: West 5th Street to Seabreeze Way
Figure 3 Area Two Seabreeze Way to Neptune Square
Figure 4 Area Three: Neptune Square to Oxnard Beach Park
Figure 5 Area Four: Oxnard Beach Park to Oxnard Shores
Figure 6 Area Five: La Granada to Channel Islands Harbor
Figure 7 Site Photographs
Figure 8 Site Photographs
Figure 9 Site Photographs

Appendices

Appendix A Biological Resources Assessment
Appendix B Sand Contamination Study

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Introduction

The coastal areas in the city of Oxnard experience severe wind events that result in wind-blown beach sand accumulating on vacant private lots and public beach access points (access points). The accumulated sand moves from the vacant lots and access points to streets, sidewalks, walkways, and parking lots resulting in slippery and unsafe conditions for motorists and pedestrians. A Sand Management Plan (SMP) is needed immediately to:

- Maintain safe access to public beach areas while protecting fragile coastal resources.
- Provide safe access for vehicles and pedestrians along public streets, sidewalks, and beach access points and provide safe reliable ADA access to public beaches.

This SMP includes proposed sand management actions, namely the redeposition of wind-blown sand from streets, sidewalks, walkways, parking lots, and access points back to the beach. The City of Oxnard Public Works Department (City PWD) is committed to preserving beaches and access points for recreation, public safety, economic benefits, and property protection benefits. Currently, wind-blown sand that migrates from the beach is hauled outside the coastal zone and disposed of at a landfill.

The City PWD with assistance from Rincon Consultants, Inc. (Rincon) has prepared this SMP to support a Coastal Development Permit (CDP) issued by the City of Oxnard Planning Department pursuant to the City of Oxnard Local Coastal Program, and appealable to the California Coastal Commission (CCC). This SMP presents the proposed management of wind-blown sand for the City PWD Sand Management Plan (project).

Purpose

The California Coastal Act of 1976 (CCA) places a priority on public access to and along the coast (CCA Section 30210), requiring maximum access and recreational opportunities be provided for all people consistent with public safety needs and the needs to protect public rights, rights of private property owners, and natural resource areas from overuse. Consistent with the requirements of the CCA, the City PWD is proposing the redeposition of wind-blown sand back onto the beach at 13 predetermined locations. The goal of the project is to proactively and frequently redeposit sand onto the beach to limit the unsafe accumulation of sand along streets, sidewalks, walkways, parking lots, and access points. The project will provide safe access along public streets, sidewalks, and beach access points for pedestrians and vehicles.

Location

The project site is located along the residential beach front communities of Oxnard Shores, Oxnard Beach Park and Channel View Park, in the western portion of the city, approximately 4 miles southwest of U.S. Highway 101, 0.5 mile west of the Edison Canal, 1 mile south of McGrath State Beach and McGrath Lake, and 400 feet east of the Pacific Ocean. The project location is depicted on the United States Geological Survey Oxnard, California 7.5-minute topographic quadrangle map and is within Township 1 North, Range 23 West, San Bernardino baseline and meridian. The project site's

center is located at latitude 34.197833° N, longitude -119.247678° W (WGS84). The entire project site is within the Coastal Zone and within the CCC appeals jurisdiction (Figure 1). The project site is divided into five areas:

- Area One – West 5th Street to Seabreeze Way
- Area Two – Seabreeze Way to Neptune Square
- Area Three – Neptune Square to Oxnard Beach Park
- Area Four – Oxnard Beach Park to Oxnard Shores
- Area Five – La Granada to Channel Islands Harbor

Background

The City PWD has historically removed wind-blown sand from streets, sidewalks, walkways, and parking lots and trucked to an off-site landfill. The amount of sand removed from public areas varies from season to season due to natural causes, such as wind, king tides and severe storms. In the first quarter of 2022 (January through March), the City PWD tracked the amount of sand removed from streets, sidewalks, walkways, parking lots, and access points and the total sand removed is presented in Table 1.

As part of project planning, a Biological Resources Assessment (BRA) was prepared by Rincon in May 2024 (Attachment A). The BRA provided the City PWD with an assessment of the potential impacts to biological resources associated with implementation of the project. The BRA documented the existing conditions of the environment surrounding the project and evaluated the potential for impacts to protected species, sensitive natural communities, jurisdictional waters, wildlife movement, and other locally protected resources, such as Environmentally Sensitive Habitat Areas (ESHA) and native trees. The BRA provides avoidance and minimization measures that is incorporated into the project to reduce potential impacts and comply with applicable policies and ordinances.

The City PWD engaged CCC staff Deanna Christensen (District Supervisor), Isabel Qi (Coastal Program Analyst), and Barbara Carey (District Manager), in October 2021 and provided a draft project description. The CCC staff provided comments related to jurisdiction, project details, water quality, Environmentally Sensitive Habitat Areas (ESHA), and public access and visual resources. Each of the staff comments have been incorporated in this SMP. A site visit with CCC staff was conducted on October 31, 2023, and comments provided as part of the site visit were incorporated into this plan.

To address the CCC comment relating to water quality, the City PWD completed a Sand Contamination Study prepared by Rincon in April 2022 (Attachment B). The purpose of sampling the sand was to evaluate the presence of potential contaminants of concern (COC) in wind-blown sand that has accumulated on streets, sidewalks, walkways, parking lots, and access points, and to determine if the sand that accumulates has COCs at concentrations that would prevent it from being suitable for placement back on the beach due to a potential impact to human health.

Based on the results of the Sand Contamination Study, the sand samples collected and analyzed during the assessment did not have COCs at concentrations that would adversely impact human health and, therefore, the wind-blown sand that has accumulated on streets, sidewalks, walkways, parking lots, and access points appears to be suitable for placement back on the beach.

Table 1 Location and Amount of Sand Removed from Public Areas

Date	Area	Location	Description of Work Performed	Cubic Yards	Proposed Cubic Yards per Year
1/19/2022	1	MANDALAY BEACH RD & 5TH ST	REMOVED SAND FROM THE SIDEWALK	19.3	735.6 – 1,000
1/24/2022	1	MANDALAY BEACH RD & 5TH ST	REMOVED SAND FROM THE STREET	14.3	
1/26/2022	1	MANDALAY BEACH RD & 5TH ST	REMOVED SAND FROM THE STREET	20.7	
1/28/2022	1	MANDALAY BEACH RD & 5TH ST	FINISHED REMOVING SAND FROM 5TH ST	9.3	
3/2/2022	1	MANDALAY BEACH RD & 5TH ST	REMOVED SAND FROM THE STREET	20.0	
3/4/2022	1	MANDALAY BEACH RD & 5TH ST	REMOVED SAND FROM THE STREET	17.9	
3/18/2022	1	MANDALAY BEACH RD & 5TH ST	REMOVED SAND FROM THE STREET	22.1	
3/21/2022	1	MANDALAY BEACH RD FROM 5TH ST TO SEABREEZE WAY	REMOVED SAND FROM THE SIDEWALK	4.3	
1/20/2022	2	MANDALAY BEACH & CAPRI WAY	REMOVED SAND FROM STREET AND ACCESS WAY	17.9	675.6 – 1,000
1/27/2022	2	MANDALAY BEACH & CAPRI WAY	REMOVED SAND FROM STREET AND ACCESS WAY	9.3	
3/4/2022	2	MANDALAY BEACH & CAPRI WAY	REMOVED SAND FROM THE STREET	21.4	
3/16/2022	2	CAPRI WAY	REMOVED SAND FROM THE STREET	64.3	
1/25/2022	2	NEPTUNE SQUARE	REMOVED SAND FROM THE STREET AND THE SIDEWALK	13.6	561.2 – 1,000
3/1/2022	2	NEPTUNE SQUARE	REMOVED SAND FROM THE STREET	13.6	
3/16/2022	2	NEPTUNE SQUARE	REMOVED SAND FROM THE PARKING LOT	57.1	
3/15/2022	1, 2, 3	BEACH ACCESS POINTS	REMOVED SAND FROM ACCESS POINTS	56.4	Included in Area 1, 2, and 3 estimates
3/22/2022	3	ADA PATHS OXNARD BEACH PARK	REMOVED SAND FROM ADA PATHWAYS	37.1	660 – 1,000
3/3/2022	4	OXNARD SHORES PARKING LOT	REMOVED SAND FROM THE PARKING LOT	32.1	300 – 500
3/17/2022	4	OXNARD SHORES PARKING LOT	REMOVED SAND FROM THE PARKING LOT	42.9	
N/A	5	CHANNEL VIEW PARK PARKING LOT	N/A	N/A	300 – 500
			Total	**497.9**	**3,232 – 5,000**

Project Description

The project site includes sandy beaches, streets, sidewalks, walkways, parking lots, and access points that are maintained by the City PWD. Based upon the amount of sand removed in 2022 and in previous years, the City PWD proposes to redeposit approximately 5,000 cubic yards of sand back onto the beach annually.

Once sand is redeposited back onto the beach, the sand will be groomed over the entire sand placement area to a maximum depth of less than six inches above the existing elevation. The sand placement areas have been identified to accommodate the amount of sand expected to be redeposited from nearby areas and placed above the highest high tide line demarcated by wrack or wetted sand, if no wrack is present. The placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species.

Public parking and/or public access to the beach will not be impacted during project activities. Temporary cones and signage will be erected to notify the public of project activities. The project includes the following components:

Access and Sand Removal Areas

These areas are access points where accumulated wind-blown sand builds up and may restrict pedestrian access to the beach. Sand may be relocated from these areas to the sand placement areas on the beach. Equipment and personnel will remove sand from these areas as well as use the areas for access to redeposit sand from streets and sidewalks at the sand placement areas.

Sand Placement Areas

Sand removed from streets, sidewalks, walkways, parking lots, and access points will be redeposited in these areas. Equipment and personnel will use the access points to gain access to the sand placement areas. Large placement areas have been identified to accept sand from roadways and smaller areas directly west of access points have been identified to accept sand that has built up in access points.

Sand Removal Areas

These are the residential streets and sidewalks of West 5th street, Mandalay Beach Road, Capri Way, Neptune Square, Marine Way, and Oxnard Beach Park, Oxnard Shores, and Channel View parking lots and associated ADA paths where wind-blown sand will be removed and redeposited in sand placement areas.

Sand Source Sites

These are vacant private lots where wind-blown sand accumulates and migrates from the lots onto streets and sidewalks. Only removal of accumulated sand along the public sidewalks and street will occur and no grading of private lots is proposed.

Work Areas

This area includes Neptune Square where the City PWD is required to maintain recreational equipment for public use. Removal of trash and grooming of sand surrounding the recreational equipment is proposed in the area.

Access Routes

Equipment will be required to travel from streets and through access points to the designated sand placement areas on the beach. The sand placement areas are approximately 50 to 200 feet west of the access points and the access routes will be 10 feet wide or less.

Storm Drain Maintenance

Existing storm drains that convey storm water from residential areas require annual maintenance activities such as removing accumulated sand and ensuring there is a clear path for water flow such that the drains don't clog and flood residential areas.

Project Site

The project site is separated into five specific areas which are described below:

Area One – West 5th Street to Seabreeze Way

The most northern segment of the project includes the main public streets of West 5th Street and Mandalay Beach Road; a large undeveloped section of sandy beach adjacent to Mandalay Beach Road; six sand placement areas (2.12 acres) west of four access points (0.72 acre); and two undeveloped private lots (sand sources sites) (0.12) (Figure 2).

Sand removal will occur along West 5th Street and Mandalay Beach Road and includes the sidewalks adjacent to the streets (3.5 acres). Wind-blown sand accumulates along West 5th Street from the undeveloped State Parks property to the north and sand accumulates along Mandalay Beach Road from two sand source sites and an undeveloped stretch of public beach at the corner of West 5th Street and Mandalay Beach Road.

Sand that accumulates on West 5th Street and Mandalay Beach Road will be redeposited along the sandy beach at the corner of West 5th Street and Mandalay Beach Road. Sand that accumulates at the three access points will be redeposited at five adjacent sand placement areas. Approximately 735.6 to 1,000 cubic yards of sand will be redeposited in these areas. Access to each sand placement area will occur at the adjacent access point.

An existing storm drain is located within the sand placement area adjacent to West 5th street and Mandalay Beach Road and a second storm drain is present northwest of Driftwood Street. Routine maintenance to clear sand from around the drain outlets is required to allow adequate storm water drainage from the residential areas.

Area Two – Seabreeze Way to Neptune Square

To the south of Area One, Area Two consists of Mandalay Beach Road south of Seabreeze way and includes Capri Way where the street dead ends at Neptune Square. This area includes four sand placement areas (0.22 acre) west of four access points (0.23 acre), and one placement area (0.37 acre) west of two access points (0.24 acre) associated with Neptune Square (2.33 acres). Two sand source sites are in this area adjacent to Capri way (0.22 acre) (Figure 3).

Sand removal will occur along Mandalay Beach Road, Capri Way, and Neptune Square and includes the sidewalks adjacent to the streets (1.73 acres). Wind-blown sand accumulates along Mandalay Beach Road and Capri Way from two sand source sites and sand accumulates at the end of Capri Way and Neptune Square from the undeveloped stretch of beach west of Neptune Square.

Sand that accumulates on Mandalay Beach Road, Capri Way, and four access points will be redeposited at four sand placement areas. Sand that accumulates along Neptune Square and one access point will be redeposited in the northwest corner of Neptune Square beach. Approximately 1,236.8 to 2,000 cubic yards of sand will be redeposited in these areas. Access to each sand placement area will occur at an adjacent access point.

An additional work area is proposed at Neptune Square beach, the City PWD will conduct sand grooming and litter removal around playground equipment and provide general maintenance of the playground equipment, basketball courts, and volleyball courts.

An existing storm drain is located west of Outrigger Way. Routine maintenance to clear sand from around the drain outlet is required to allow adequate storm water drainage from the residential areas.

Area Three – Neptune Square to Oxnard Beach Park

Area Three is south of Neptune Square to Oxnard Beach Park. This area consists of Marine Way, two sand placement areas (0.50 acre), one sand source site (0.06 acre), two access points (1.16 acres), and three access points for trash service only associated with Oxnard Beach Park (Figure 4).

Sand removal will occur along Marine Way (0.40 acre) and will be redeposited at a sand placement area to the southwest. Wind-blown sand accumulates along Marine Way from one sand source site and accumulates at an access point to the beach. Sand that accumulates along the ADA paths will be swept to the side of the paths and if excessive sand accumulates then it will be placed to the sand placement area north of the pathways. Access for trash service will occur at three locations at Oxnard Beach Park. Equipment will not enter the beach from these areas. Approximately 660 to 1,000 cubic yards of sand will be redeposited in these areas.

An existing storm drain is located west of Amalfi Way and south of the ADA paths at Oxnard Beach Park. Routine maintenance to clear sand from around the drain outlets is required to allow adequate storm water drainage from the residential areas.

Area Four – Oxnard Beach Park to Oxnard Shores

Area Four consists of Oxnard Shores parking lot, ADA paths, one sand placement area, and two access points (Figure 5). Sand removal will occur in the Oxnard Shores parking lot (1.84 acres), along the ADA paths (0.54 acre), and at an access point to the beach (0.16 acre). The sand will be redeposited at a sand placement area (1.02 acres) adjacent to the ADA paths. Sand accumulates along the ADA paths on a frequent basis and proactive sweeping is proposed in this area to limit the extreme buildup of sand on the pathways limiting public access to the beach. Approximately 300 to 500 cubic yards of sand will be redeposited in these areas.

An existing storm drain is located west of the Oxnard Shores parking log. Routine maintenance to clear sand from around the drain outlet is required to allow adequate storm water drainage from the residential areas.

Area Five – La Granada to Channel Islands Harbor

The most southern area includes the parking lot adjacent to Channel Islands Harbor entrance (0.33 acre). Sand accumulated in the parking lot and sidewalks will be redeposited at the sand placement area at the corner of West 5th Street and Mandalay Beach Road.

Table 2 presents the approximate dimensions of each sand removal area, sand placement areas, sand source sites, and work areas.

Table 2 Project Site Dimensions

W 5th Street to Seabreeze Way/Area One	Access and Sand Removal	Corner of West 5th Street and Mandalay Beach Road Access Point and Sand Removal	191019024	0.62 / 26,828
		Reef Way Access Point and Sand Removal	191004138	0.04 / 1,695
		Beachcomber Way Access Point and Sand Removal	191005131	0.03 / 1,185
		Seabreeze Way Access Point and Sand Removal	191005144	0.03 / 1,223
	Sand Placement	Corner of West 5th Street and Mandalay Beach Road Sand Placement	191019024 191019025	1.88 / 81,821
		Reef way Sand Placement	191004139	0.05 / 2,065
		Beachcomber Way Sand Placement 1	191005134	0.02 / 840
		Beachcomber Way Sand Placement 2	191005136	0.07 / 3,087
		Seabreeze Way Sand Placement 1	191005115 191005148	0.05 / 2,146
		Seabreeze Way Sand Placement 2	191005148	0.05 / 2,183
	Sand Removal	West 5th street	Public ROW	0.83 / 35,948
		Mandalay Beach Road	Public ROW	2.67 / 116,154
	Sand Source Site	Oxnard Shores Drive	191004119	0.05 / 2,000
		Seabreeze Way	191005141	0.07 / 3,200
Seabreeze Way to Neptune Square / Area Two	Access and Sand Removal	Outrigger Way Access Point and Sand Removal Point	191008130	0.03 / 1,303
		W Wooley Road Access Point and Sand Removal	N/A	0.07 / 3,009
		Moonstone Way Access Point and Sand Removal 1	191009131	0.05 / 2,324
		Moonstone Way Access Point and Sand Removal 2	191009124	0.08 / 3,305
		Neptune Square Access Point and Sand Removal 1	191013234 Public ROW	0.04 / 1,675

		Neptune Square Access Point and Sand Removal 2	191013234 Public ROW	0.2 / 8,751
	Sand Placement	Outrigger Way Sand Placement	191009130	0.04 / 1,932
		W Wooley Road Sand Placement 1	191009130	0.06 / 2,516
		W Wooley Road Sand Placement 2	191009130	0.04 / 1,585
		Moonstone Way Sand Placement	191009130	0.08 / 3,683
		Neptune Square Sand Placement	191013235	0.37 / 16,040
	Sand Removal	Mandalay Beach Road	Public ROW	0.71 / 31,130
		Capri Way	Public ROW	0.55 / 23,882
		Neptune Square	Public ROW	1.18 / 51,607
	Sand Source Site	W Wooley Road	191008136	0.1 / 4,510
		Moonstone Way	191009122	0.12 / 5,047
	Work Area	Neptune Square	191013234 191013235	2.33 / 101,421
Neptune Square to Oxnard Beach Park/ Area Three	Access and Sand Removal	Marine Way Access Point and Sand Removal	Public ROW opnspc	0.03 / 1,349
		Oxnard Beach Park ADA Paths Access Point and Sand Removal 1	191014036 191014045 191014044	0.65 / 28,478
		Oxnard Beach Park ADA Paths Access Point and Sand Removal 2	191014036 191014045 191014044	0.48 / 20,806
	Sand Placement	Marine Way Sand Placement	opnspc	0.27 / 11,823
		Oxnard Beach Park ADA Paths Sand Placement	191014036	0.23 / 9,843
	Sand Removal	Marine Way	Public ROW	0.4 / 17,509
	Sand Source Site	Marine Way	191015411	0.06 / 2,827
	Access Only (Trash Service)	Oxnard Beach Park ADA Paths	191014035 191014044	0.21 / 8,619
Oxnard Beach Park to Oxnard Shores/ Area Four	Access and Sand Removal	Oxnard Shores ADA Paths	191014044	0.18 / 8,006
		Oxnard Shores Beach	191014044	0.16 / 12,637
	Sand Placement	Oxnard Shores Beach	191014044	1.02 / 44,607
	Sand Removal	Oxnard Shores Parking Lot	191014044	1.84 / 80,276
		Oxnard Shores ADA Paths	191014044	0.18 / 7,822

La Granada Street to Channel Islands Harbor/ Area Five	Sand Removal	Channel View Park Parking Lot	206021014 206022618	0.33 / 14,541
Total Estimated Project Area	**Access and Sand Removal**			**2.82 / 122,574**
	Sand Placement			**4.23 / 175,171**
	Sand Removal			**7.76 / 338,175**
	Sand Source Site			**0.40 / 17,584**
	Work Area			**2.33 / 101,421**
	Access Only (Trash Service)			**0.21 / 8,619**

Schedule

The implementation of the project is anticipated to occur monthly but will depend largely on wind velocity and storm frequency. Sensitive species avoidance measures will be implemented, and project activities will avoid sensitive biological resources, if present, including nesting birds. A portion of the project which includes hand sweeping ADA walkways at Oxnard Beach Park and Oxnard Shores may occur two to three times per week. Sand removal activities will occur over a one-to-six-day period each month, depending on the amount of accumulated sand. The redeposition of sand will occur on the same day as the sand removal activities. Project activities may be required outside daylight hours if determined an emergency and may have an imminent threat on life and/or property. Otherwise, activities will occur Monday through Friday during normal business hours.

Equipment

Once every two weeks, or more frequently during significant storm events, the City PWD will inspect the project site for wind-blown sand. For areas identified causing safety concerns, equipment such as a wheel or track loader, backhoe, or track skid steer. A John Deere tractor with a beach cleaner and haul vehicle attachment will be deployed to redeposit sand in the designated sand placement areas. Trucks and wheel skid steers will remain on paved roads. Hand crews will shovel and hand sweep along ADA paths. Immediately after the sand has been redeposited at the sand placement areas a tractor with a sand cleaning attachment and groom will be used to remove any debris or trash. Grooming and debris removal will only occur in designated sand placement areas, or the work area associated with Neptune Square. A street sweeper may be utilized along the sand removal areas and all material picked up will be transported to a landfill. The project will involve the use of various heavy equipment, including the following:

Within the Streets, Sidewalks, Paths, Parking lots, and Access Ways:

- 10 Ton Dump Trucks
- 1/2 Pickup Trucks
- Cat 420XE Backhoe Loader, Cat 440 Backhoe Loader, John Deer 310SE Backhoe Loader
- Cat 289D3 Tracked Skid Steer, Cat 262D3 Wheeled Skid Steer

- JBC 427, 437, 457 Wheel Loader, Cat 926, 930, 938, and 926M Small Wheel Loaders

Work performed on the Beach:

- Cat 420XE Backhoe Loader, Cat 440 Backhoe Loader, John Deer 310SE Backhoe Loader
- Cat 289D3 Tracked Skid Steer, Cat 262D3 Wheeled Skid Steer
- JBC 427, 437, 457 Wheel Loader, Cat 926, 930, 938, and 926M Small Wheel Loaders
- Cat D3, D4, D5, D6, Dozers
- BEACHTECH 3000 beach cleaner and haul vehicle with a two-piece vibrating screen to separate sand from debris.

Existing Conditions

Physical Characteristics

Elevations within the project site range from approximately 10 to 13 ft above mean sea level (msl). The topography of the project site is relatively flat and contains mostly developed/disturbed areas and sandy beach, such as existing public roads, parking lots, paved walking paths, and public beaches. The project site is approximately 400 feet east of the Pacific Ocean and is bordered by residential development and agricultural land to the east.

The sandy beach from West 5th Street to Channel Islands Harbor is characterized by areas with intact dunes, areas with eroded dunes, and areas void of dunes. The sand dunes that do occur range from lightly to moderately impacted, may support native and invasive vegetation species, and provide physical protection to homes. The most intact dunes occur adjacent but outside of the project site north of West 5th Street in Area One. These dunes are separated by the project site by an existing fence. Additionally, lightly impacted dunes, those that have natural dune topography and native species interspersed with non-native species, occur south of Marine Way in Area Three and surrounding the ADA paths in Area Three and Area Four. Moderately impacted dunes are those that have irregular morphology and support only non-native vegetation species, these moderately impacted dunes occur at one access point in Area One near Reef Way.

Sand placement is proposed in areas devoid of sand dunes and in areas that do not contain vegetation or exhibit dune morphology, such as hummocks, hollows, and ridges. The proposed project would not result in the direct removal of vegetation or impacts to ESHA.

The sand dunes north of West 5Th Street in Area One, south of Marine Way in Area Three, and adjacent to the ADA paths in Area Three and Area Four are considered environmentally sensitive habitat areas (ESHA), which the Coastal Act Section 30107.5 defines, as “Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.” The proposed project would temporarily encroach into the 100 ft ESHA buffer, which is outlined in the City of Oxnard Coastal Land Use Plan, Local Coastal Policy 6 (City 1982). However, the policy states that the buffer may be reduced if the applicant can demonstrate that the functional capacity of the resource protection area is maintained. Direct impacts to the dune ESHA would be avoided during the project and the project site would be clearly delineated in the field to prevent direct impacts outside of designated areas and at minimum a 10-foot buffer will be maintained from any vegetated area or areas exhibiting dune morphology.

Chemical Characteristics

The Sand Contamination Study (Appendix B) concluded that detected metals in the sand samples are within typical background concentrations established for California soil and do not exceed any of the screening levels to which they have been compared, except for arsenic.

Detected concentrations of arsenic are within naturally occurring background concentration ranges and do not exceed the effects range low (ERL) and effects range median (ERM) values for arsenic in marine sediment. In addition, the detected concentrations of arsenic in the sand source site samples are similar to the concentrations detected in the sand removal area samples. Therefore, arsenic appears to be typical of naturally occurring background concentrations and is not considered a COC. Poly chlorinated biphenyls (PCBs) and polynuclear Aromatic Hydrocarbons (PNAs) were not detected above the method detection limits. Total petroleum hydrocarbons (TPH) was either not detected above the method detection limits or was detected at concentrations below their respective Tier 1 human health Environmental Screening Levels (ESLs) established by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) for residential soil, direct exposure scenario.

The detected concentration of 4,4'-DDT at Channel View parking lot in Area Five was 0.0013 milligrams per kilogram (mg/kg) which slightly exceeds the Tier 1 ESL (0.0011 mg/kg), which is based on the protection of terrestrial habitats with significantly vegetated areas (such as parkland or single-family homes with yards). The detected concentration of 4,4'-DDT in the sample does not exceed the residential ESL or Screening Levels (SLs) established by the Department of Toxic Substance Control (DTSC), or the ERL value or the ERM values used to evaluate toxicity in marine sediment. Because the detected concentration of 4,4'-DDT was only slightly above the conservative Tier 1 ESL and since the detected concentration does not exceed the ERM or ERL values for 4,4'-DDT which are used to evaluate the toxicity in marine sediment, the detected concentration of 4,4'-DDT in the sample was not considered a COC of concern.

Minimization Measures

The following minimization and stabilization measures will be implemented to minimize impacts to ESHA.

BIO-1 Worker Environmental Awareness Program

Prior to initiation of all project activities (including staging and mobilization), all personnel associated with the project should attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to assist workers in recognizing special status biological resources with the potential to occur in the project site. This training will include information about California legless lizard, western snowy plover, California least tern, ESHA, as well as other special status species potentially occurring in the project site.

The specifics of this program will include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the project site. A fact sheet conveying this information will also be prepared for distribution to all personnel involved with construction of the project. All personnel will sign a form provided by the trainer documenting they attended the WEAP and understand the information presented.

BIO-2 General Best Management Practices

General requirements that should be followed by project personnel are as follows:

- All food-related trash items such as wrappers, cans, bottles, and food scraps generated during proposed project should be disposed of in closed containers only and removed daily from the project site.
- Sand placement will not occur below the highest high tide line and will avoid placement on wrack.
- No deliberate feeding of wildlife should be allowed.
- No pets should be allowed on the project site.
- No firearms should be allowed on the project site.
- If vehicle or equipment maintenance is necessary, it should be performed in the designated staging areas at least 100 ft from ESHA.
- During project activities, heavy equipment should be operated in accordance with standard Best Management Practices (BMPs). All equipment used on-site should be properly maintained to avoid leaks of oil, fuel, or residues. Provisions should be in place to remediate any accidental spills.

- While encounters with special status species are not likely or anticipated, any personnel who inadvertently injure or kill a special status species or find one dead, injured, or entrapped should immediately report the incident to the City PWD. The City PWD should coordinate with a qualified biologist to determine species and if appropriate, the City should follow up with written notification to USFWS and/or CDFW within five working days of the incident.

BIO-3 Nesting Bird Avoidance

To avoid disturbance to nesting and special status birds, including raptor species protected by the MBTA and CFGC 3503, activities related to the project including, but not limited to, the use of heavy equipment in beach areas and ground disturbance will occur outside of the bird breeding season for migratory birds (generally February 1 through August 31), as feasible. If the project activities must be conducted during the breeding season, then a pre-activity nesting bird survey will be conducted no more than seven days prior to the use of heavy equipment in beach areas or ground disturbing activities.

If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) should be determined and demarcated by the biologist with bright orange construction fencing, flagging, or other means to mark the boundary. All project personnel should be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground-disturbing activities should occur inside this buffer until the avian biologist has confirmed breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer should occur only at the discretion of the qualified biologist.

BIO-4 Western Snowy Plover Avoidance

When project equipment enters the beach or ESHA, the following should be followed by project personnel.

- Vehicles should avoid operating in ESHA, with the exception of activities such as trash pick-up. Any trash pick-up within ESHA will be done by hand.
- Project activities will avoid ESHA, and vehicles should remain below a maximum 10 miles per hours speed limit and if western snowy plovers are encountered, the driver should back up at least 50 feet and/or alter their route to avoid flushing plovers.
- If active nests are observed, a refuge area should be created using symbolic fencing or another barrier deemed suitable. The fencing should be erected in a 300-ft diameter around the traditional center of the plover's roosting area and signage should be placed on the barrier.
- Any wrack encountered on the beach should be left in place.
- As described in BIO-1, all project personnel would be provided a specific training in the identification and ecological characteristics of western snowy plover. The training would

also include a fact sheet conveying this information along with other commonly encountered shorebirds.

BIO-5 ESHA Avoidance

During project activities, the project areas would be clearly delineated in the field to prevent direct impacts outside of designated areas and at minimum a 10-foot buffer will be maintained from any vegetated area or areas exhibiting dune morphology, as feasible.

Conclusion

Natural beach sand deposits are important for recreation by the public and serve as a barrier against storm waves, thus protecting coastal residences and commercial investments. Currently the City PWD removes wind-blown sand from streets, sidewalks, walkways, and parking lots and disposes of at a land fill. The City PWD realizes the importance of maintaining our fragile coastal resources and is proposing to redeposit sand back onto the beach. The City PWD has conducted a BRA to avoid sensitive biological resources and has incorporated minimization measures into the project design.

The City PWD conducted a sand contamination study to provide an assessment of potential COCs in sand removal areas and at sand source sites to identify areas that may potentially contain contaminants that would be harmful to human health. Based on the results of the sand contamination study, the City PWD approach to relocating sand from the sand removal areas to the sand placement areas is recommended as follows: immediately after the sand has been redeposited at the sand placement areas on the beach, a tractor with a sand cleaning attachment and groom shall be used to remove any debris or trash. All debris and trash collected shall be transported to a landfill.

Every two weeks the project site will be inspected for accumulated sand and safety concerns. Sand will be proactively removed monthly or after severe wind events limiting the unsafe accumulation of sand that currently occurs. The proactive redeposition of sand onto the beach will limit the potential trash/debris that may accumulate in the wind-blown sand while maintaining sand on public beaches. The elevation of placed sand will not exceed six inches above the existing beach grade and will not impact access or ocean views. The City PWD has selected suitable placement areas to receive sand quantities appropriate for the areas. Large placement areas have been identified to accept sand from roadways and smaller areas directly west of access points have been identified to accept sand that has built up in access points limiting public access to the beach.

The City PWD has incorporated all comments from the CCC into the project design and with implementation of the proposed minimization measures the project would not have the potential to result in significant adverse environmental impacts to natural resources. The intent of the project is to maintain public beach access and ensure safe road conditions exist for motorists and pedestrians.

References

City of Oxnard Planning and Environmental Services. 1982. Coastal Land Use Plan. February 1982 revised May 2002.

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Figures

Figure 1 Regional Location



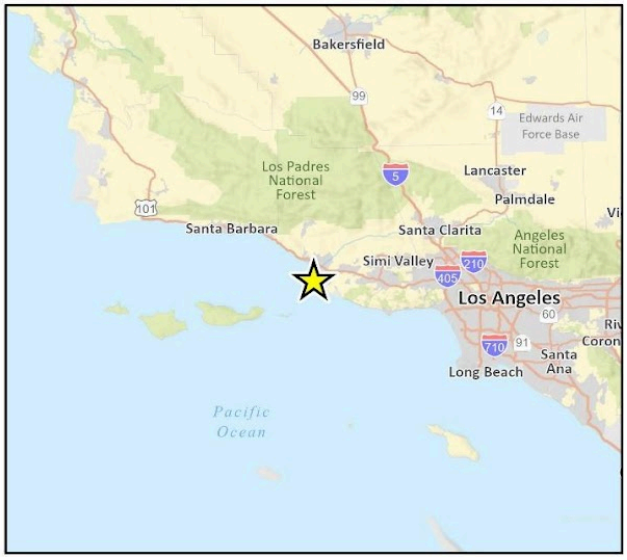


Figure 2 Area One: West 5th Street to Seabreeze Way



Figure 3 Area Two Seabreeze Way to Neptune Square



Figure 4 Area Three: Neptune Square to Oxnard Beach Park

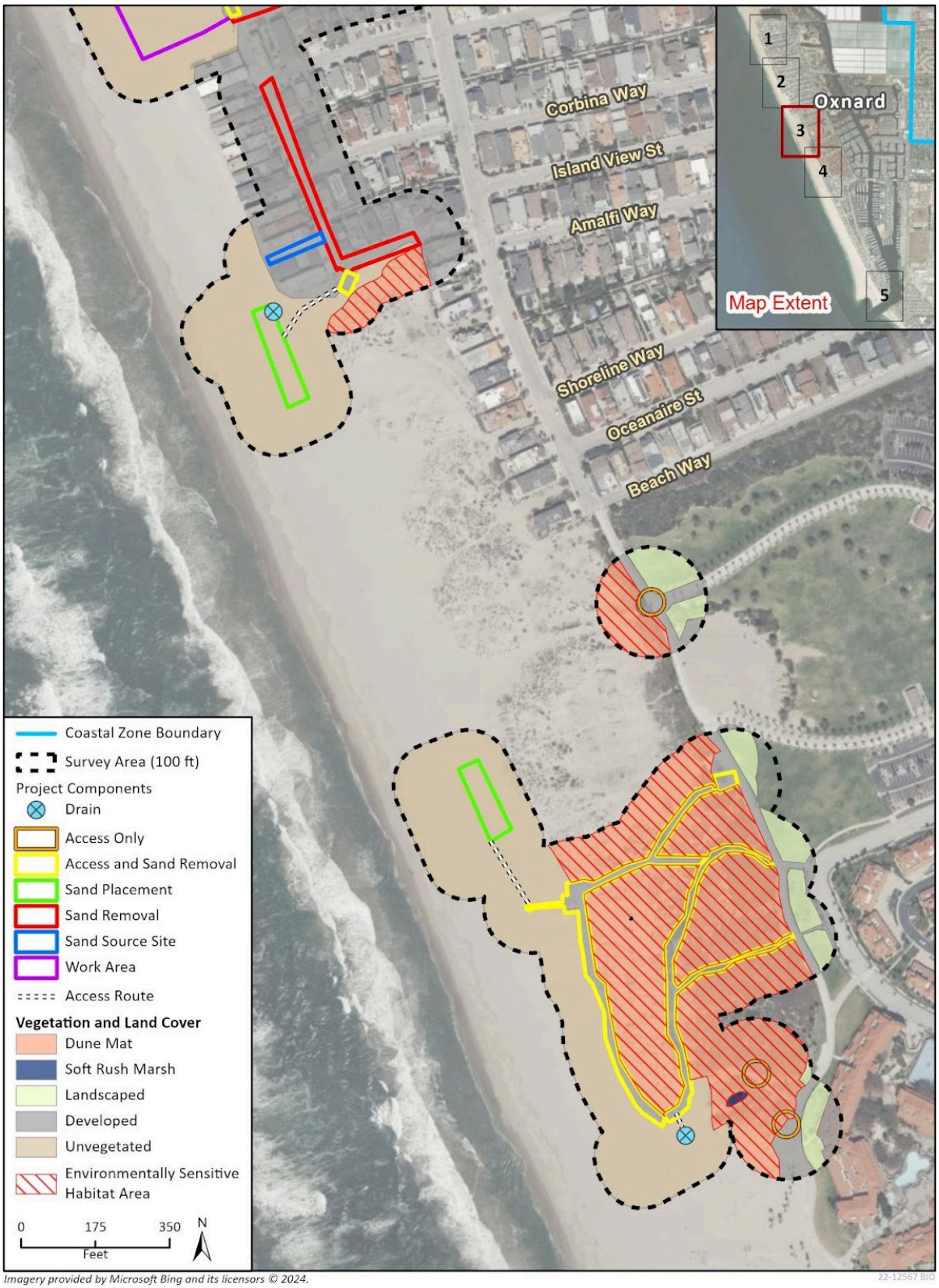


Figure 5 Area Four: Oxnard Beach Park to Oxnard Shores

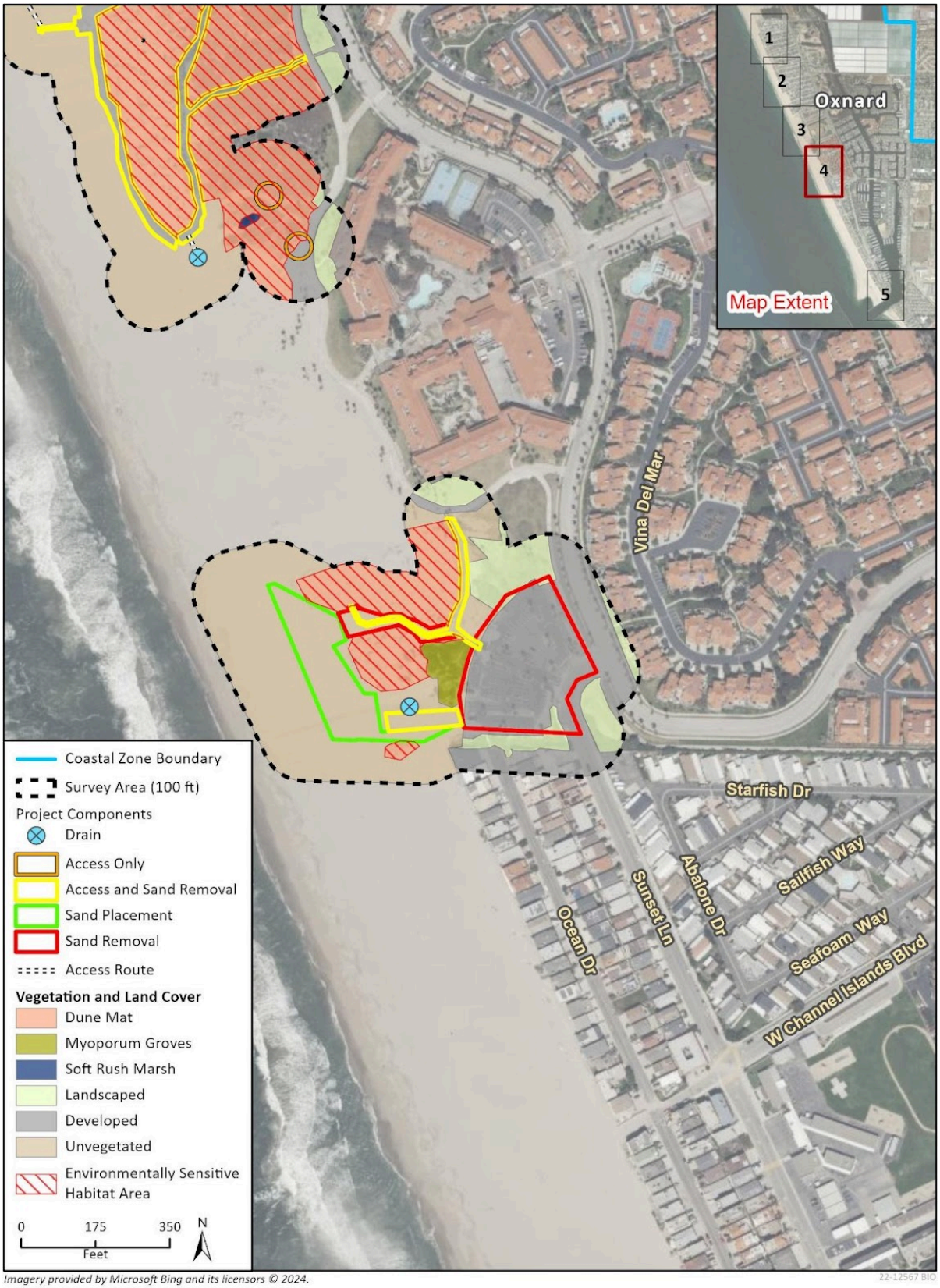


Figure 6 Area Five: La Granada to Channel Islands Harbor



Figure 7 Site Photographs



Photograph 1. View of sand removal area at corner of West 5th Street and Mandalay Road in Area One.



Photograph 2. View of sand placemnet area at corner of West 5th Street and Mandalay Road in Area One.



Photograph 3. View of acess and sand removal area west of Reef Way in Area One.



Photograph 4. View of sand source site west of Seabreeze Way in Area One.

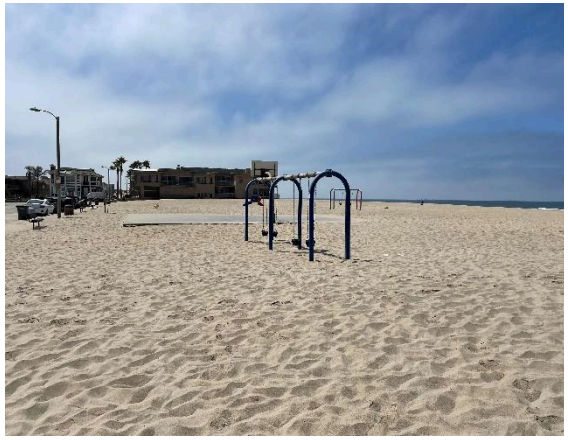


Photograph 5. View of access and sand removal area along Capri Way in Area Two.



Photograph 6. View of sand placement area west of Neptune Square in Area Two.

Figure 8 Site Photographs



Photograph 7. View of work area at Neptune Square in Area Two.



Photograph 8. View of access and sand removal area at end of Marine Way in Area Three.



Photograph 9. View of sand placement area in Area Three.



Photograph 10. View of access point at Oxnard Beach Park in Area Three.



Photograph 11. View of access and sand removal area along ADA paths in Oxnard Beach Park in Area Three.



Photograph 12. View of access and sand removal area along ADA paths in Oxnard Beach Park in Area Three.

Figure 9 Site Photographs



Photograph 13. View of sand removal area in Oxnard Shore parking lot in Area Four.



Photograph 14. View of sand removal area in Oxnard Shore parking lot in Area Four.



Photograph 15. View of access and sand removal area along ADA paths in Area Four.



Photograph 16. View of sand placement area in Area Four.



Photograph 17. View of sand removal area at Channel View parking lot in Area Five.



Photograph 18. View of BEACHTECH 3000 beach cleaner.

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Appendix A

Biological Resources Assessment



City of Oxnard Sand Management Plan

Biological Resources Assessment

prepared for

City of Oxnard
Public Works Department
305 West Third Street
Oxnard, California 93030
Contact: Brian J. Yanez
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May 2024

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Table of Contents

1 Introduction 1
1.1 Project Location 1
1.2 Project Description 1
2 Methodology 12
2.1 Regulatory Overview 12
2.1.1 Definition of Special Status Species 12
2.1.2 Environmental Statutes 12
2.2 Literature Review 13
2.3 Field Reconnaissance Survey 13
2.4 Beach Intertidal Invertebrate Survey 14
3 Existing Conditions 15
3.1 Physical Characteristics 15
3.1.1 Watershed and Drainages 15
3.1.2 Soils 16
3.2 Vegetation Communities and Other Land Cover 16
3.3 General Wildlife 18
4 Sensitive Biological Resources 19
4.1 Special Status Species 19
4.1.1 Special Status Plant Species 19
4.1.2 Special Status Animal Species 20
4.2 Sensitive Plant Communities, Environmentally Sensitive Habitats, and Critical Habitat 21
4.3 Jurisdictional Areas 22
4.4 Wildlife Movement 22
4.5 Resources Protected By Local Policies and Ordinances 24
4.6 Habitat Conservation Plans 25
5 Impact Analysis and Mitigation Measures 26
5.1 Special-Status Species 26
5.2 Sensitive Plant Communities, Environmentally Sensitive Habitats, and Critical Habitat 29
5.3 Jurisdictional Areas 29
5.4 Wildlife Movement 29
5.5 Local Policies and Ordinances 30
5.6 Habitat Conservation Plans 30
6 Limitations, Assumptions, and Use Reliance 31
7 References 32
8 List of Preparers 34

Tables

Table 1 Project Site Estimates 9

Figures

Figure 1 Regional Location Map 3
Figure 2 Area One: West 5th Street to Seabreeze Way 4
Figure 3 Area Two: Seabreeze Way to Neptune Square 5
Figure 4 Area Three: Neptune Square to Oxnard Beach Park 6
Figure 5 Area Four: Oxnard Beach Park to Oxnard Shores 7
Figure 6 Area Five: La Granada Street to Channel Islands Harbor 8
Figure 7 Critical Habitat and Potentially Jurisdictional Areas 23

Appendices

Appendix A Regulatory Framework
Appendix B Site Photographs
Appendix C Floral and Faunal Compendium
Appendix D Special Status Species Evaluation Tables

1 Introduction

Rincon Consultants, Inc. (Rincon) prepared this Biological Resources Assessment (BRA) report to provide the City of Oxnard Public Works Department (City) with an assessment of the potential impacts to biological resources associated with implementation of the City of Oxnard Public Works Department Sand Management Plan (project). This report documents the existing conditions of the environment surrounding the project site and evaluates the potential for impacts to protected species, sensitive natural communities, jurisdictional waters, wildlife movement, and other locally protected resources, such as Environmentally Sensitive Habitat Areas (ESHA) and native trees. The biological evaluation herein includes the results of a background literature review and field reconnaissance survey conducted by Rincon.

1.1 Project Location

The project site is located along the residential beach front communities of Oxnard Shores, Oxnard Beach Park, and Channel View Park, in the western portion of the city, approximately 4 miles southwest of U.S. Highway 101, 0.5 mile west of the Edison Canal, 1 mile south of McGrath State Beach and McGrath Lake, and approximately 400 feet east of the Pacific Ocean (Figure 1). The project location is depicted on the United States Geological Survey (USGS) *Oxnard*, California 7.5-minute topographic quadrangle map and is within Township 1 North, Range 23 West, San Bernardino baseline and meridian. The project site's center is located at latitude 34.197833° N, longitude -119.247678° W (WGS84). The entire project site is within the Coastal Zone and within the California Coastal Commission (CCC) appeals jurisdiction. The project site is separated into five specific areas.

- Area One: West 5th Street to Seabreeze Way
- Area Two: Seabreeze Way to Northern Neptune Square
- Area Three: Southern Neptune Square to Oxnard Beach Park
- Area Four: Oxnard Beach Park to Oxnard Shores
- Area Five: La Granada to Channel Islands Harbor

1.2 Project Description

The project will require access for sand removal activities from roadways, parking lots, sidewalks, pathways, trails, and public access points, and will redeposit sand in designated placement areas. Sand removal, sand placement, access routes, additional work areas for grooming and litter removal are included as part of the project. All project components are collectively referred to as the project site. The sand removal areas include the residential streets of West 5th Street, Mandalay Beach Road, Capri Way, Neptune Square, Marine Way, Oxnard Beach Park parking lot and Oxnard Shores parking lot. Additionally, sand will be removed from public beach access points, which are present between residential homes, and relocated approximately 50 to 200 feet west along the beach. The

sand placement sites will be in designated areas on the beach west of each removal area. Access to the sand placement sites will be adjacent to various private homes in the northern portion of the project site and along existing accessways in the Oxnard Beach Park area. Access routes will be 10 feet wide or less (Figure 2 through Figure 6).

The City proposes a strategy for managing windblown sand transport issues along public streets, parking lots, and access ways within the city. Due to consistent natural causes, such as wind, king tides, and severe storms, the City has determined the need for beach sand relocation and placement.

The City is proposing to remove approximately 5,000 cubic yards of sand annually. The redeposition process will occur during daylight hours and the frequency will be determined by a number of factors, including but not limited to, wind and storm events, and the number of people using public access locations and beaches. Wind and storm events generally deposit sand in public parking lots, walking paths, and streets. On average walking paths are required to be cleared of sand two to three times per week, streets to be cleared monthly, and access to the sand placement areas will occur on the same day. Sand redeposition activities may be required outside of daylight hours if determined to be an emergency and may have an imminent threat on life and/or property. The project will involve the use of various heavy equipment, including the following:

Within the Streets, Sidewalks, Paths, Parking lots, and Access Ways:

- 10 Ton Dump Trucks
- 1/2 Pickup Trucks
- Cat 420XE Backhoe Loader, Cat 440 Backhoe Loader, John Deer 310SE Backhoe Loader
- Cat 289D3 Tracked Skid Steer, Cat 262D3 Wheeled Skid Steer
- JBC 427, 437, 457 Wheel Loader, Cat 926, 930, 938, and 926M Small Wheel Loaders

Work performed on the Beach:

- Cat 420XE Backhoe Loader, Cat 440 Backhoe Loader, John Deer 310SE Backhoe Loader
- Cat 289D3 Tracked Skid Steer, Cat 262D3 Wheeled Skid Steer
- JBC 427, 437, 457 Wheel Loader, Cat 926, 930, 938, and 926M Small Wheel Loaders
- Cat D3, D4, D5, D6, Dozers
- BEACHTECH 3000 beach cleaner and haul vehicle with a two-piece vibrating screen to separate sand from debris.

Once the sand is removed from the street or public beach access points, the sand will then be redeposited back onto the beach at up to 13 locations. Heavy equipment will remain above the high tide line and will not enter the water and the placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species. Additional work areas that require grooming and litter removal will occur within two public beach areas at Neptune Square and Oxnard Beach Park.

Access to the sand placement areas may include up to 14 separate access points to gain access onto the beach and an additional three locations at Oxnard Beach Park for access only to provide trash service. The implementation of the project is anticipated to occur monthly but will depend largely on wind velocity and storm frequency. A portion of the project which includes hand sweeping ADA

walkways at Oxnard Beach Park and Oxnard Shores may occur two to three times per week. Sand removal activities will occur over a one-to-six-day period each month, depending on the amount of accumulated sand. The redeposition of sand will occur on the same day as the sand removal activities. Table 1 provides a summary of the individual project sites and total estimated work area.

Figure 1 Project Site Location Map





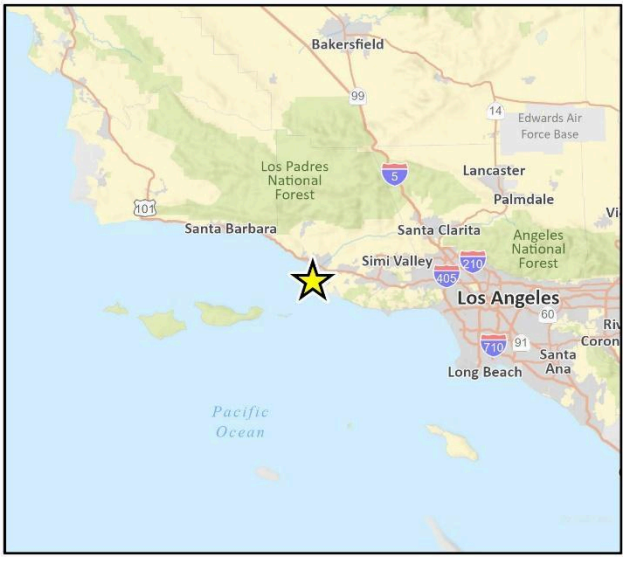

Figure 2 Area One: West 5th Street to Seabreeze Way



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Additional data provided by County of Ventura, 2021.

Figure 3 Area Two: Seabreeze Way to Neptune Square



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Figure 4 Area Three: Neptune Square to Oxnard Beach Park

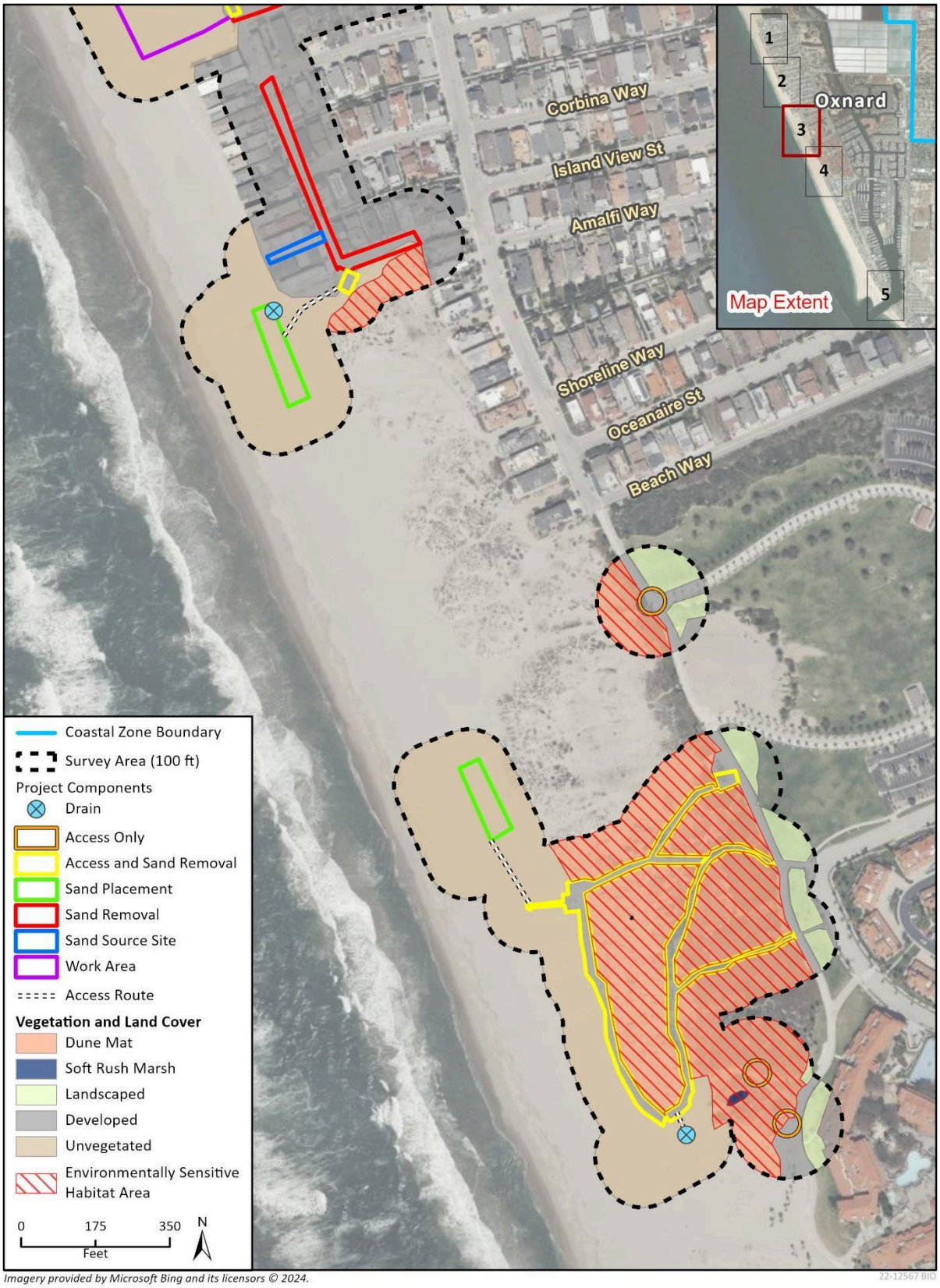

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Figure 5 Area Four: Oxnard Beach Park to Oxnard Shores

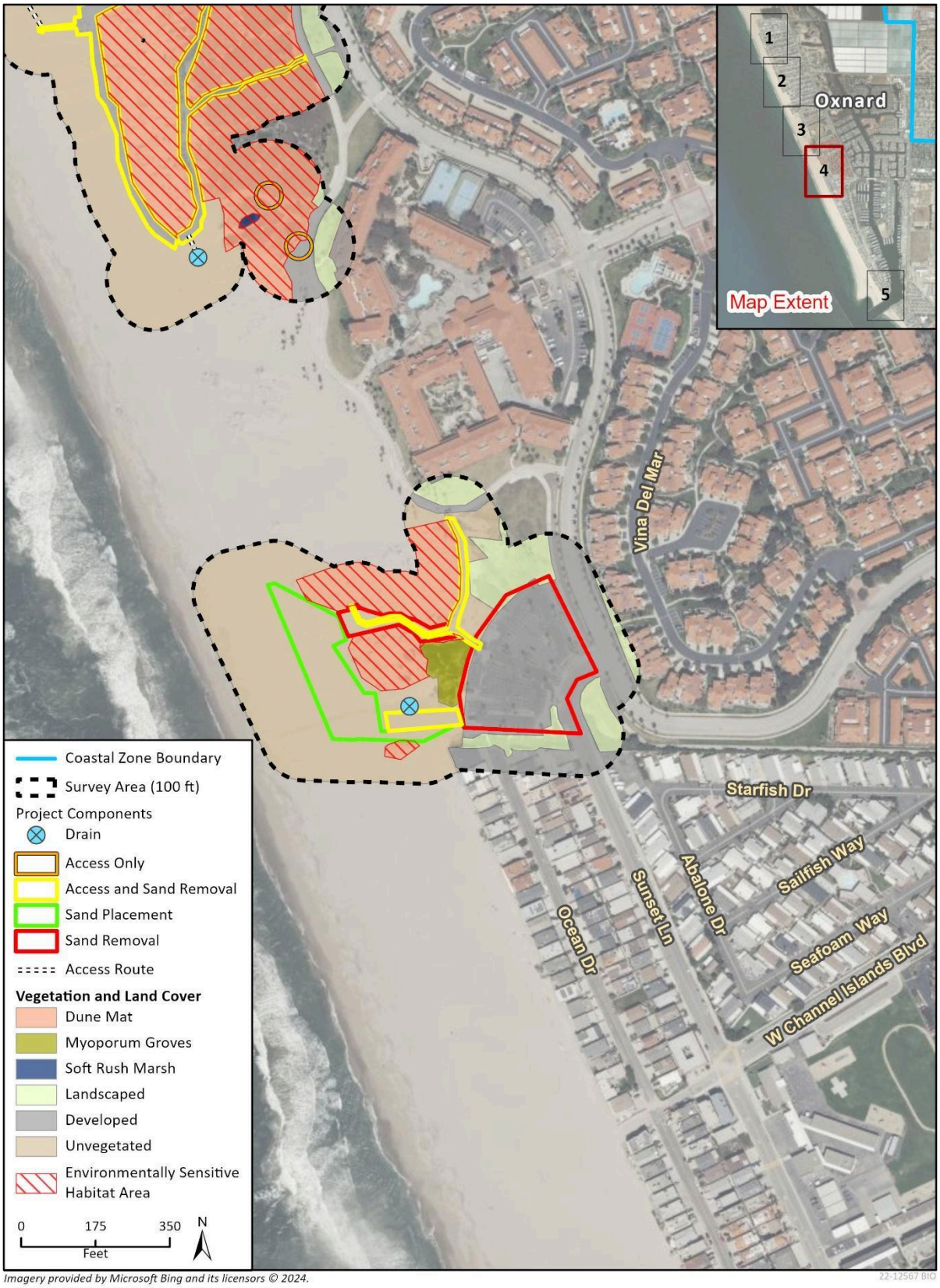

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Figure 6 Area Five: La Granada Street to Channel Islands Harbor



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Table 1 Project Area Estimates

W 5th Street to Seabreeze Way/Area One	Access and Sand Removal	Corner of West 5th Street and Mandalay Beach Road Access Point and Sand Removal	191019024	0.62 / 26,828
		Reef Way Access Point and Sand Removal	191004138	0.04 / 1,695
		Beachcomber Way Access Point and Sand Removal	191005131	0.03 / 1,185
		Seabreeze Way Access Point and Sand Removal	191005144	0.03 / 1,223
	Sand Placement	Corner of West 5th Street and Mandalay Beach Road Sand Placement	191019024 191019025	1.88 / 81,821
		Reef way Sand Placement	191004139	0.05 / 2,065
		Beachcomber Way Sand Placement 1	191005134	0.02 / 840
		Beachcomber Way Sand Placement 2	191005136	0.07 / 3,087
		Seabreeze Way Sand Placement 1	191005115 191005148	0.05 / 2,146
		Seabreeze Way Sand Placement 2	191005148	0.05 / 2,183
	Sand Removal	West 5th street	Public ROW	0.83 / 35,948
		Mandalay Beach Road	Public ROW	2.67 / 116,154
	Sand Source Site	Oxnard Shores Drive	191004119	0.05 / 2,000
		Seabreeze Way	191005141	0.07 / 3,200
Seabreeze Way to Neptune Square / Area Two	Access and Sand Removal	Outrigger Way Access Point and Sand Removal Point	191008130	0.03 / 1,303
		W Wooley Road Access Point and Sand Removal	N/A	0.07 / 3,009
		Moonstone Way Access Point and Sand Removal 1	191009131	0.05 / 2,324
		Moonstone Way Access Point and Sand Removal 2	191009124	0.08 / 3,305
		Neptune Square Access Point and Sand Removal 1	191013234 Public ROW	0.04 / 1,675

		Neptune Square Access Point and Sand Removal 2	191013234 Public ROW	0.2 / 8,751
	Sand Placement	Outrigger Way Sand Placement	191009130	0.04 / 1,932
		W Wooley Road Sand Placement 1	191009130	0.06 / 2,516
		W Wooley Road Sand Placement 2	191009130	0.04 / 1,585
		Moonstone Way Sand Placement	191009130	0.08 / 3,683
		Neptune Square Sand Placement	191013235	0.37 / 16,040
	Sand Removal	Mandalay Beach Road	Public ROW	0.71 / 31,130
		Capri Way	Public ROW	0.55 / 23,882
		Neptune Square	Public ROW	1.18 / 51,607
	Sand Source Site	W Wooley Road	191008136	0.1 / 4,510
		Moonstone Way	191009122	0.12 / 5,047
	Work Area	Neptune Square	191013234 191013235	2.33 / 101,421
Neptune Square to Oxnard Beach Park/ Area Three	Access and Sand Removal	Marine Way Access Point and Sand Removal	Public ROW opnspc	0.03 / 1,349
		Oxnard Beach Park ADA Paths Access Point and Sand Removal 1	191014036 191014045 191014044	0.65 / 28,478
		Oxnard Beach Park ADA Paths Access Point and Sand Removal 2	191014036 191014045 191014044	0.48 / 20,806
	Sand Placement	Marine Way Sand Placement	opnspc	0.27 / 11,823
		Oxnard Beach Park ADA Paths Sand Placement	191014036	0.23 / 9,843
	Sand Removal	Marine Way	Public ROW	0.4 / 17,509
	Sand Source Site	Marine Way	191015411	0.06 / 2,827
	Access Only (Trash Service)	Oxnard Beach Park ADA Paths	191014035 191014044	0.21 / 8,619
Oxnard Beach Park to Oxnard Shores/ Area Four	Access and Sand Removal	Oxnard Shores ADA Paths	191014044	0.18 / 8,006
		Oxnard Shores Beach	191014044	0.29 / 12,637

	Sand Placement	Oxnard Shores Beach	191014044	1.02 / 44,607
	Sand Removal	Oxnard Shores Parking Lot	191014044	1.84 / 80,276
		Oxnard Shores ADA Paths	191014044	0.18 / 7,822
La Granada Street to Channel Islands Harbor/ Area Five	Sand Removal	Channel View Park Parking Lot	206021014 206022618	0.33 / 14,541
Total Estimated Project Area	**Access and Sand Removal**			**2.82 / 122,574**
	Sand Placement			**4.23 / 175,171**
	Sand Removal			**7.76 / 338,175**
	Sand Source Site			**0.40 / 17,584**
	Work Area			**2.33 / 101,421**
	Access Only (Trash Service)			**0.21 / 8,619**

2 Methodology

2.1 Regulatory Overview

Regulated or sensitive resources studied and analyzed herein include special status plant and animal species, nesting birds, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, and locally protected resources, such as protected trees. Regulatory authority over biological resources is shared by federal, state, and local authorities. Primary authority for regulation of general biological resources lies within the land use control and planning authority of the City and CCC.

2.1.1 Definition of Special Status Species

For this report, special status species include:

- Species listed as threatened or endangered under the Federal Endangered Species Act (FESA); species that are under review may be included if there is a reasonable expectation of listing within the life of the project
- Species listed as candidate, threatened, or endangered under the California Endangered Species Act (CESA)
- Species designated as Fully Protected, Species of Special Concern, or Watch List by the California Department of Fish and Wildlife (CDFW)
- Species designated as locally important by the Local Agency and/or otherwise protected through ordinance or local policy
- Ventura County Locally Important Species (VCLIS)

2.1.2 Environmental Statutes

For this report, potential impacts to biological resources were analyzed based on the following statutes (Appendix A):

- FESA
- CESA
- Federal Clean Water Act (CWA)
- California Fish and Game Code (CFGC)
- Migratory Bird Treaty Act (MBTA)
- The Bald and Golden Eagle Protection Act
- Porter-Cologne Water Quality Control Act

- California Coastal Act
- City of Oxnard 2030 General Plan
- City of Oxnard Coastal Land Use Plan

2.2 Literature Review

Prior to conducting the field reconnaissance survey, Rincon reviewed literature to collect baseline information on biological resources potentially occurring at the project site and in the surrounding area. The literature review included information available in peer reviewed journals and standard reference materials (Holland 1986; Baldwin et al. 2012; Sawyer et al. 2009; Stebbins 2003; American Ornithologists Union 2014).

Rincon also conducted a review of relevant databases for sensitive resource occurrences in the *Oxnard*, California USGS 7.5-minute topographic quadrangle and five surrounding landward quadrangles, *Ventura*, *Saticoy*, *Santa Paula*, *Camarillo*, and *Point Mugu* (three remaining quadrangles of a standard nine-quad search consist of the Pacific Ocean). The sensitive species queries from the CDFW California Natural Diversity Data Base (CNDDB) (CDFW 2021a) and Biogeographic Information and Observation System (BIOS) (2021c); the California Native Plant Society (CNPS) Online Inventory of Rare Plants (CNPS 2021); VCLIS (Ventura County Planning Division 2014a and 2014b); and the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation System (IPaC) (USFWS 2021c) were evaluated and the species list within a five-mile radius were combined into one potential to occur table.

The USFWS National Wetlands Inventory (NWI) Wetlands Mapper (USFWS 2021a) was utilized to determine waters, wetland, and streambed resources in the vicinity, and the United States Department of Agriculture, Natural Resources Conservation Service (NRCS) Web Soil Survey (NRCS 2021a) was queried to determine soil map units, including the *State Soils Data Access Hydric Soils List* (USDA NRCS 2020b) to determine if any soil map unit types mapped in or near the survey area were classified as hydric. Further, the Critical Habitat Portal (USFWS 2021b), and California Natural Communities List and Sensitive Natural Communities List (CDFW 2020) were reviewed for the presence of critical habitat, and sensitive natural communities. Other sources of information included aerial photographs, topographic maps, geologic maps, climatic data, and project plans.

2.3 Field Reconnaissance Survey

The survey area for the field survey was established, and consisted of the project site, plus a 100-foot buffer. Rincon biologists, Jaime McClain and Lindsey Stockton, conducted a field reconnaissance survey on July 20, 2021, between the hours of 0930 and 1330. Weather was sunny with temperatures ranging from approximately 62 to 75 degrees Fahrenheit (°F) and winds approximately 1 to 5 miles per hour. The survey consisted of the biologists walking the extent of the survey area documenting general site conditions and habitats, recording the plants and animals observed (Appendix C). During the survey, the biologists mapped the boundaries of vegetation communities associated with potentially jurisdictional aquatic resources, including any potential wetlands and non-wetland waters that may constitute waters of the United States (U.S.), waters of the State, and/or riparian resources. A formal jurisdictional delineation was not completed as part of the field reconnaissance survey.

The entire survey area was visually inspected. Wildlife species were identified by direct observation, vocalization, or by sign (e.g., tracks, scat, burrows, etc.). The detection of plant and wildlife species was limited by seasonal and temporal factors. The survey was conducted during summer (July); therefore, potentially occurring spring migrants and/or breeders would not be present during the time of the survey, and fall migrants, if present, would be transient without the likelihood of nesting.

Likewise, plants more easily identified during their blooming periods in the spring and fall are difficult to detect without blooming characteristics. As the survey was performed during the day, identification of nocturnal wildlife was limited to sign, if present on site. Plant species nomenclature and taxonomy followed *The Jepson Manual: Vascular Plants of California*, *Second edition* (Baldwin et al. 2012). The vegetation classification used for this analysis is based on *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009), but it has been modified as needed to describe accurately the existing vegetation communities on site.

2.4 Beach Intertidal Invertebrate Survey

In addition to a field reconnaissance survey, Rincon biologists conducted a beach intertidal invertebrate survey. The survey consisted of six separate transects extending approximately 300 feet (ft) perpendicular to the shoreline. The transects were located within six of the sand placement areas spaced throughout the project site. At each transect, ten cores were obtained using a clam gun. The ten cores were each ten centimeters (cm) in diameter and 20 cm in depth. The ten cores collected at each intertidal zone were composite in a 1.0-millimeter (mm) aperture sieving bag and processed, exposing infauna species and sediment. All invertebrates and sediment retained on the sieves were sorted in the field and identified to the lowest taxonomic level possible.

3 Existing Conditions

This section summarizes the results of the survey effort and provides further analysis of the data collected in the field. Discussions regarding the general environmental setting, habitat types, plant and wildlife species observed, special status species, and other biological resource constraints observed within the survey area are presented below. Representative photographs of the survey area are provided in Appendix B.

3.1 Physical Characteristics

Elevations within the survey area range from approximately 10 to 13 ft above mean sea level (msl). The climate in this region is Mediterranean. Summers are warm and dry while the winters are cool and often wet, with an annual minimum average temperature of 50 degrees Fahrenheit (F), an annual maximum average temperature of 70.1 degrees F, and an average annual precipitation of 14.82 inches (WRCC 2021). The topography of the survey area is relatively flat and contains mostly developed/disturbed areas, such as existing access roads, parking lots, and paved walking paths. The survey area is approximately 400 feet east of the Pacific Ocean and is bordered by residential development and agricultural land to the east.

3.1.1 Watershed and Drainages

General hydrology of the survey area was evaluated through review of topographic maps, aerial photos, and the National Hydrography Dataset (NHD) (USGS 2021). The survey area occurs in the McGrath Lake-Frontal Pacific Ocean Sub-watershed (Hydrologic Unit Code: OCEAN) within the Calleguas Creek watershed (USGS 2021). Based on an examination of aerial imagery and observations during the field reconnaissance survey, two potentially jurisdictional features exist within the survey area: 1) the Pacific Ocean, and 2) an unnamed potentially jurisdictional coastal wetland. The project site is generally located approximately 400 feet east of the Pacific Ocean; however, the survey area for Area Five includes open waters of the Pacific Ocean within Channel Islands Harbor (Figure 6). The Pacific Ocean within Channel Islands Harbor is mapped by the NWI as a subtidal estuary with an unconsolidated bottom that has been excavated (USFWS 2021a). This feature may be regulated by the United States Army Corps of Engineers (USACE) as non-wetland waters of the U.S., and by the Los Angeles Regional Water Quality Control Board (LARWQCB) as non-wetland waters of the State. Additionally, an unnamed potentially jurisdictional coastal wetland exists within Area Four and is associated with a soft rush marsh vegetation community (Figure 5). As stated in Section 2.3, a formal jurisdictional delineation was not completed for the project. However, based upon visual observation, the potentially jurisdictional coastal wetland was observed to the extent of the area mapped as the soft rush marsh vegetation community. This potentially jurisdictional feature is not recognized by the NWI, but contains wetland vegetation in the form of soft rush (*Juncus effusus*) and ponded water (USFWS 2021a). The area mapped as the soft rush marsh vegetation community may be classified as wetland waters of the U.S. and State by the USACE and LARWQCB, respectively, a coastal wetland pursuant to the California Coastal Act, and a CDFW-jurisdictional streambed. No other potentially jurisdictional features were identified within the survey area.

3.1.2 Soils

The USDA-NRCS has mapped one soil unit within the survey area: Coastal beaches (NRCS 2021a). This soil type is found on beaches and is derived from beach sands. It is poorly drained with a very low available water capacity and high frequency of flooding. Coastal beaches soil is classified as hydric. During the field reconnaissance survey, soil surface conditions were generally consistent with the mapped type and surface textures were generally sandy.

3.2 Vegetation Communities and Other Land Cover

Habitat classification is based on the classification systems provided in *A Manual of California Vegetation, Second Edition* (Sawyer et al., 2009) (MCV) and *Preliminary Descriptions of the Terrestrial Communities of California* (Holland, 1986), modified slightly to reflect existing conditions. Vegetation communities are described below and illustrated in Figure 2 through Figure 6. Four vegetation communities and three land cover types were observed in the survey area.

Dune Mat

Dune mat (*Abronia latifolia – Ambrosia chamissonis* Herbaceous Alliance) is a native community with herbaceous (non-woody) vegetation layer dominated by sand verbena (*Abronia latifolia*) and beach bur (*Ambrosia chamissonis*) with other perennial herbs, grasses, and low shrubs. It is primarily associated with the sand dunes of coastal bars, river mouths, and spits along the immediate coastline. The CDFW classifies dune mat as sensitive natural community, with a S3/G3 ranking and constitutes as ESHA pursuant to the California Coastal Act (CDFW 2020).

This vegetation community occurs in the northern and central portion of the survey area, pink sand verbena (*Abronia umbellata*), beach bur, European beach grass (*Ammophila arenaria*), seaside heliotrope (*Heliotropium curassavicum*), and European sea rocket (*Cakile maritima*) are present. The dune mat is low quality habitat in the survey area due to the frequent foot traffic and is surrounded by developed land to the east, north, and south, with unvegetated sand beach habitat directly west.

Arroyo Willow Thicket

Within Area One, north of West 5th Street, an arroyo willow thicket (*Salix lasiolepis* Shrubland Alliance) is present. This native vegetation community is characterized by having arroyo willow as dominant in the shrub canopy (>50% relative cover). It commonly occurs along stream banks and benches, slope seeps, and along drainages (Sawyer et al. 2009). The CDFW classified this vegetation community as S4/G4 at the alliance level, and is considered a sensitive natural community (CDFW 2020). This vegetation community is classified as ESHA.

Within the survey area, this vegetation community is dominated by arroyo willow (*Salix lasiolepis*) in the shrub layer, with herbaceous species such as Italian thistle (*Carduus pycnocephalus*), short-pod mustard (*Hirschfeldia incana*), and Bermuda grass (*Cynodon dactylon*) present in the understory. Emergent coyote brush (*Baccharis pilularis*) and mock heather scrub (*Ericameria ericoides*) are present in the shrub layer.

Myoporum Groves

Within Area Four, west of Oxnard Shores parking lot, a Myoporum grove (*Myoporum laetum* Forest and Woodland Semi-Natural Alliance) is present. This non-native vegetation community is characterized by having Myoporum (*Myoporum laetum*) as the dominant species (>60% relative cover) in the tree layer (Sawyer et al. 2009). It commonly occurs in coastal canyons, washes, slopes, riparian areas, and roadsides. This vegetation community is not provided a rarity ranking by CDFW due to the dominance of non-native plant species (CDFW 2020). This vegetation community is not classified as ESHA.

Within the survey area, this vegetation community is dominated by Myoporum in the tree layer, with non-native herbaceous plant species sparsely present in the herbaceous layer.

Soft Rush Marsh

Within Area Four, soft rush marsh (*Juncus effusus* Herbaceous Alliance) is present within the central portion of the survey area. This native vegetation community is characterized by soft rush as a dominant species (>50% relative cover) in the herbaceous layer (Sawyer et al. 2009). This vegetation community commonly occurs within stock ponds, minor depressions, wet meadows, and seeps. The USFWS recognizes soft rush as a facultative wetland plant (FACW) (USACE 2018). This vegetation community is ranked by the CDFW as S4/G4, and is classified as ESHA (CDFW 2020).

Within the survey area, soft rush is dominant in the herbaceous layer, with sedges (*Carex* sp.) present in the herbaceous layer. No shrubs or trees are present within this vegetation community.

Unvegetated

The unvegetated portions of the survey area are characterized as a sand beach. Within the survey area characteristics of a high intertidal or upper beach zone were present. The high intertidal zone is defined as the area landward of the wrack line, where organic material and other debris is deposited at high tide. The wrack line is also indicative of the OHWM which is established by the fluctuations of water and indicated by physical characteristics. The wrack line varied in organic material and density throughout the survey area and consisted of algal species including, giant kelp (*Macrocystis pyrifera*), surf grass (*Phyllospadix* sp.) and other brown and red algae. Other debris such as plastics and trash were found throughout the survey area.

Developed/Landscaped

The majority of the easternmost portion of the survey area, within the Oxnard Shores community, is developed/landscaped. These areas consist of buildings, residential development, and other infrastructure, paved or graded dirt areas with little to no vegetation, or planted ornamental species. A bike path and paved roads provide separation between the unvegetated sand beach and vegetation communities west of Oxnard Beach Park. Both the Oxnard Beach Park and Harbor Channel Park contain ornamental trees and shrubs scattered throughout the parking lots. Plant species, such as Chilean sea fig (*Carpobrotus chilensis*) and ice plant (*Carpobrotus edulis*), are dominant in landscaped areas. Ice plant was observed to be most dense in areas directly adjacent to paved parking lots and roads with some scattered individuals within the dune mat vegetation community in the center and northern portions of the survey area. In areas where ice plant was the dominant species, no other plant species were present. Pedestrian traffic has damaged portions of the ice plant mat near the Oxnard Beach Park area. In these areas, only dry stems were observed.

3.3 General Wildlife

The survey area contains habitat suitable for wildlife species that commonly occur in southern California suburban areas. Wildlife observed within the survey area include bird species such as western gull (*Larus occidentalis*), rock pigeon (*Columba livia*), and snowy egret (*Egretta thula*). Avian and insect activity was low during the survey and multiple tire tracks/footprints from bikes and pedestrians were visible throughout the survey area.

The beach intertidal invertebrate survey did not indicate the presence of invertebrate species within the unvegetated sand beach habitat. All transects and associated sand cores were negative for intertidal invertebrates. A complete list of all the plant and wildlife species observed on site during the biological field survey is provided in Appendix C.

4 Sensitive Biological Resources

Local, state, and federal agencies regulate special status species and other sensitive biological resources and require an assessment of their presence or potential presence to be conducted prior to the approval of proposed activities. This section discusses regulated sensitive biological resources observed on the project site and evaluates the potential for the project site to support additional sensitive biological resources.

4.1 Special Status Species

Assessments for the potential occurrence of special status species are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDB, species occurrence records from other sites in the vicinity of the survey area, previous reports for the project site, and the results of surveys of the project site. The potential for each special status species to occur in the survey area was evaluated according to the following criteria (Appendix D):

- **No Potential:** Habitat on and adjacent to the site is unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime), and species would have been identifiable on-site if present (e.g., oak trees). Protocol surveys (if conducted) did not detect species.
- **Low Potential.** Few of the habitat components (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime) meeting the species requirements are present on or adjacent to the site. The species is not likely to be found on the site. Protocol surveys (if conducted) did not detect species.
- **Moderate Potential**. Some of the habitat components (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime) meeting the species requirements are present on or adjacent to the site. The species has a moderate probability of being found on the site.
- **High Potential**. Habitat components (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime) meeting the species requirements are present throughout the project site and adjacent to the project site. Multiple species observation records (e.g., CNDDB) occur within the vicinity of the project site. The species has a high probability of being found on the site.
- **Present.** Species was observed on the site or has been recorded (e.g., CNDDB, other reports) on the site recently (within the last 5 years).

Special status species or other protected species likely to occur or present within or adjacent to the survey area are discussed below, and, if applicable evaluated under Section 5. Species with no potential or low potential are only discussed if warranted.

4.1.1 Special Status Plant Species

Based on the database and literature review, 12 special status plant species are known to occur or have the potential to occur in the survey area, as reported in the CNDDB and CNPS Inventory. These

species were evaluated for potential to occur within the survey area based on the existence of habitat, on soil conditions, and on professional experience of the biologists that conducted the field survey. Of the 12 species, the survey area provides elements of habitat meeting the species requirements but the disturbed and developed nature of the survey area likely precludes these species from occurring. Dune mat and soft rush marsh vegetation communities are present in the survey area, but the communities provide marginal habitat due to frequent foot traffic and the surrounding development. The field survey was conducted within the blooming period for all species except for Mexican malacothrix (*Malacothrix similis*), and no suitable habitat for Mexican malacothrix is present within the survey area. Based on the negative survey results, mapped soil types, prevalence of non-native species (e.g., ice plant), existing development, and disturbances, the survey area lacks the specialized requirements for special status plant species. All special status plant species evaluated have no or low potential to occur within the survey area and are not discussed further.

4.1.2 Special Status Animal Species

No special status animal species were observed during the field reconnaissance survey. Based on the database and literature review, 22 special status wildlife species are known to occur or have the potential to occur within the survey area. Of these, the California legless lizard (*Anniella pulchra*), western snowy plover (*Charadrius nivosus nivosus*), and California least tern (*Sternula antillarum browni*) were determined to have a moderate potential to occur based on the presence of some of the habitat components meeting the species requirements and nearby CNDDB records within five miles of the survey area. These species are discussed in further detail in the following sections.

The remaining species have no or a low potential to occur in the survey area due to the level of disturbed/developed land cover. These species are not expected to be found at the survey area and are not discussed further.

California Legless Lizard

The California legless lizard is a state species of special concern (SSC) that requires a habitat composed of sandy or loose loamy soils under sparse vegetation (Stebbins 2003). Soils with high moisture content are essential (California Herps 2018). The survey area provides habitat for California legless lizard within the dune mat vegetation community, as this community provides loose sandy soil under sparse vegetation. However, the dune mat is subject to frequent disturbance and areas densely vegetated by ice plant within the landscaped land cover type likely preclude the species. Six CNDDB occurrences exist within 5 miles of the survey area. Based on the presence of habitat within the dune mat vegetation community and CNDDB occurrence history within the survey area, this species has a moderate potential to occur.

Western Snowy Plover

The western snowy plover is a federally threatened (FT) and California SSC that requires habitat composed of sandy beaches, salt pond levees, and shores of large alkali lakes. They require sandy, gravelly, or friable soils for nesting. The majority of the survey area is either developed or frequently disturbed by recreational use, and these areas do not provide suitable habitat for western snowy plover. However, areas within the survey area that are relatively undisturbed (e.g., the dune mat vegetation community) provide suitable habitat (sandy beaches and shores) for western snowy plover foraging and nesting. The CNDDB documents five occurrences of this species within 5 miles of

the survey area, and the beach portions of the survey area are considered critical habitat for western snowy plover by the USFWS (USFWS 2021b). Within the survey area, eBird documents over 20 occurrences of individuals in recent years and known nesting habitat is documented along Hollywood Beach, a Ventura County maintained beach, west of Area Five (eBird 2021). Therefore, western snowy plover has a high potential to occur for foraging and a low potential to occur for breeding within the survey area. Known breeding areas occur outside of the project site and the project site does not contain suitable breeding habitat but individuals may occur transiently or forage within the project site.

California Least Tern

California least tern is a small tern with a distinctive black-capped head and is both state and federally listed as endangered (FE) as well as state fully protected (FP). This species nests along the California coast and breeds colonially on bare or sparsely vegetated areas. There is suitable foraging habitat within the survey area; however, nesting habitat is low quality due to frequent recreational disturbance. California least tern is known to nest between McGrath Lake and the Santa Clara River approximately 1 mile northwest of the survey area as well as southeast of Port Hueneme Harbor, and these locations are documented in the CNDDB. Although nesting habitat for California least tern is of poor quality within the survey area, this species may transiently occupy the survey area to forage. Therefore, this species has moderate potential to occur within the survey area.

4.2 Sensitive Plant Communities, Environmentally Sensitive Habitats, and Critical Habitat

Three natural communities tracked in the CNDDB are documented within 5 miles of the survey area: coastal and valley freshwater marsh, southern coastal salt marsh, and southern riparian scrub. Due to the prevalence of disturbed/developed land cover, these habitats do not occur within the survey area. Dune mat is located in the northern and central portion of the survey area and is identified as coastal scrub ESHA in the City's Draft Coastal Land Use Plan (City of Oxnard 2017 [draft]).

Two federally designated critical habitat features occur within the survey area: Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*) and western snowy plover (Figure 6).

Ventura marsh milk-vetch critical habitat occurs in Area One, north of West 5th Street, and 100 feet north of the project site. Very little is known about the habitat requirements for this species since it is only known from one extant occurrence. Based on historical information (Wilken and Wardlaw 2001) this subspecies of marsh milk-vetch occurs in low-elevation coastal dune-swale areas, where freshwater levels (in the form of saturated soils or groundwater) are high enough to reach the roots of the plants. However, due to the disturbed nature of the project site, this species is not expected to occur within the project site but has a low potential to occur within the survey area.

Western snowy plover critical habitat is designated on the beach and dune mat vegetation community within the survey area. The beach and dunes in the survey area may support both wintering populations and breeding populations. However, the species has not been documented breeding outside of Hollywood Beach within the survey area. The species may occur transiently on the beach or dunes but has a low potential to nest outside of Hollywood Beach due to nearby development and the high level of disturbance in the survey area. The project site provides low quality habitat for breeding and therefore breeding has a low potential to occur. However, the project site provides habitat for foraging and the species has a high potential to occur foraging.

4.3 Jurisdictional Areas

Potentially jurisdictional waters include waters of the U.S. that are subject to the jurisdiction of the USACE under Section 10 of the Rivers and Harbors Act and Section 401 of the CWA; the LARWQCB, pursuant to Section 401 of the CWA and the Porter-Cologne Water Quality Control Act; the CDFW pursuant to CFGC Section 1600 *et seq*.; and wetlands as defined by the CCC in accordance with the California Coastal Act. Results of the research and field reconnaissance survey revealed two potentially jurisdictional features within the survey area; the Pacific Ocean and an unnamed coastal wetland.

The Pacific Ocean is considered a jurisdictional feature and therefore subject to USACE, LARWQCB, and CCC, but does not contain any waters that fall under the jurisdiction of CFGC Section 1600. Tidally influenced areas are not subject to Section 1600. During the field reconnaissance survey, the unnamed coastal wetland had indicators of wetland hydrology and hydrophytic vegetation (Figure 6). The feature was inundated, and the soil surface was densely vegetated with soft rush and sedge species. A formal jurisdictional delineation was not completed as part of the field reconnaissance survey. Therefore, the presence of hydric soils was not confirmed. However, the presence of inundation leads to a high probability that anaerobic conditions are present which is indicative of hydric soils. In addition, the presence of a concrete culvert outlet supports this conclusion that the feature is likely constantly inundated and supports vegetation species that require prolonged inundation or saturated soil conditions. This feature is considered a jurisdictional feature and therefore subject to USACE, LARWQCB, CCC, and CDFW.

4.4 Wildlife Movement

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches. They allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

The habitats in the link do not necessarily need to be the same as the habitats being linked. Rather, the link merely needs to contain sufficient cover and forage to allow temporary inhabitation by ground-dwelling species. Typically, habitat linkages are contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Depending upon the species using a corridor, specific physical resources (e.g., rock outcroppings, vernal pools, or oak trees) may need to be in the habitat link at certain intervals to allow slower-moving species to traverse the link. For highly mobile or aerial species, habitat linkages may be discontinuous patches of suitable resources spaced sufficiently close together to permit travel along a route in a short period of time.

Wildlife movement corridors can be both large- and small-scale. At the regional/landscape level scale, the survey area is not within any mapped/modeled landscape linkages, such as an Essential Connectivity Area or Natural Landscape block in the California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California (Spencer et al. 2010). At a local scale, the survey

area does not contain suitable features that would likely facilitate local movement between habitat patches due to the developed and disturbed nature of the project site.

Figure 7 Critical Habitat and Potentially Jurisdictional Areas



4.5 Resources Protected By Local Policies and Ordinances

The project is in the Coastal Zone, within the CCC appeals jurisdiction. The City's General Plan (City of Oxnard 2011), and specifically the Coastal Land Use Plan (City of Oxnard 1982) contain policies identifying the protection, preservation, and enhancement of biological and natural resources, in particular ESHA. The City is currently updating the Coastal Land Use Plan and resources such as ESHA maps were reviewed (City of Oxnard 2017).

The City's Municipal Code and the above-mentioned plans and maps were reviewed. The survey area is designated as an ESHA area. The developed portions of the project site are not designated as ESHA but occur within the ESHA buffer. The City has numerous general policies pertaining to resource protection and the specific ordinances and policy's that would apply to the project site discussed below.

City Municipal Code Chapter 17, Coastal Zoning, is anticipated to apply since it regulates "development." Development for the purposes of this report is defined as the construction, reconstruction, demolition, or alteration of the size of any structure including any facility of any private, public or municipal utility; and the removal or harvesting of any major vegetation other than for agricultural purposes.

Article III Specific Coastal Development and Resource Standards Section 17-31 includes a resource protection ordinance which includes the following policies:

Local Coastal Policy 6

a. All nonauthorized motor vehicles shall be banned from sensitive areas.
b. Scientific, education and light recreational uses shall be conditionally permitted uses in all sensitive resources area. Development shall be designated and sited to minimize impacts to the area. Permitted uses shall not be allowed to significantly disrupt habitat values.
c. In sand dunes, foot traffic shall be minimized, and allowed only on established paths or boardwalks. Disturbance or destruction of any dune vegetation shall be prohibited unless no feasible alternative exists and then they only when revegetation with native California plants is a condition of approval.
d. New development adjacent to wetlands or resource protection areas shall be sited and designed to mitigate any adverse impacts to the wetlands or resource.

   A buffer of 100 ft in width shall be provided adjacent to all resource protection areas. The buffer may be reduced to a minimum of 50 ft only if the applicant can demonstrate the large buffer is unnecessary to protect the resources of the habitat area. All proposed development shall demonstrate that the functional capacity of the resource protection area is maintained.

   When a development is proposed within an environmentally sensitive habitat or a resource protection area, or within 100 ft of such areas, a biological report shall be prepared which includes applicable topographic, vegetative and soils information. The information shall include physical and biological features existing in the habitat areas. The report shall be prepared by a qualified biologist, and shall recommend mitigation measures to protect any impacted resources. All recommendations shall be made in cooperation with the State

Department of Fish and Game. When applicable restoration of damaged habitat shall be a condition of approval.

e. When a development is proposed within or near an environmentally sensitive habitat area, applicable topographic, vegetative and soils information shall be provided. The information shall include physical and biological features existing in the habitat areas.

4.6 Habitat Conservation Plans

The proposed project does not occur within any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, conservation plans are not addressed further within this analysis.

5 Impact Analysis and Mitigation Measures

This section discusses the possible adverse impacts to biological resources that may occur from implementation of the project based on the criteria used to evaluate potential project-related impacts to biological resources in Section 2. The section includes avoidance and minimization measures that would be incorporated into the project to reduce potential impacts and comply with applicable policies and ordinances.

5.1 Special-Status Species

5.1.1 Special Status Plant Species

No special status plant species were observed during the reconnaissance survey. Special status plant species have specialized habitat requirements, including plant community types, soils, and other components. The project site may temporarily impact dune habitat which contains elements of habitat for some special status plant species, but based on the prevalence of non-native species (e.g., ice plant), existing development, and frequent human disturbance, special status plant species are not expected to occur within the project site. In addition, none of the 12 special status plant species analyzed were documented in the survey area during the field reconnaissance survey. Therefore, the proposed project is not expected to result in potential impacts to special status plant species.

5.1.2 Special Status Wildlife Species

No special status wildlife species were observed during the field reconnaissance survey. Special status wildlife species were determined to occur within the survey area based upon known ranges, habitat preferences, species occurrence records from the CNDDB, and species occurrence records from other sites in the vicinity of the survey area. The following special status species were identified as having a moderate potential to occur: California legless lizard, western snowy plover, and California least tern. With implementation of recommended Avoidance and Minimization Measures, impacts to special status wildlife species would be avoided.

California Legless Lizard

The California legless lizard is a state SSC that was determined to have a moderate potential to occur due to the recent CNDDB occurrence in the survey area in 2017. Although the survey area has elements of the species' habitat (e.g., sandy soils and sparse vegetation), the surrounding area is highly developed. California legless lizard may be directly affected (injury or mortality) by project activities (e.g., redepositing sand) if individuals are present in the project site during project activities. Potential impacts to the species from sand redepositing activities would be avoided or minimized by implementation of Avoidance and Minimization Measures BIO-1 and BIO-2.

Western Snowy Plover

The western snowy plover exhibits strong fidelity to overwintering sites, which provide connectivity for dispersal between breeding sites. Hollywood Beach is a known breeding site and the remaining

beach area within the survey area may provide important overwintering habitat. The project site is frequently disturbed by public use and the species is likely accustomed to ambient disturbance. However, potential impacts to the species from project activities would be avoided or minimized by implementation of Avoidance and Minimization Measures BIO-1, BIO-2, BIO-3 and BIO-4.

California Least Tern

Undisturbed beach habitat suitable for California least tern nesting is not present within the project site, and this species is only expected to occur transiently to forage. If California least tern individuals are present during project activities, they would likely avoid direct impacts from project activities by flying away. Potential indirect or direct impacts to California least tern would be avoided or minimized by implementation of Avoidance and Minimization Measures BIO-1, BIO-2, and BIO-3.

Nesting Birds

The survey area contains habitat that can support nesting birds, including raptors, protected under the CFGC Section 3503 and the MBTA (16 United States Code §§ 703–712). Nesting birds may be impacted if active nests are present during project activities. Nesting birds, including raptors, can be disturbed by noise and human activity and may abandon nests during the breeding season. Nest abandonment during the breeding season could result in mortality of eggs of nestlings. Potential indirect or direct impacts to nesting birds would be avoided or minimized by implementation of Avoidance and Minimization Measures BIO-1, BIO-2, and BIO-3.

Avoidance and Minimization Measures

BIO-1 Worker Environmental Awareness Program

Prior to initiation of all project activities (including staging and mobilization), all personnel associated with the project should attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to assist workers in recognizing special status biological resources with the potential to occur in the project site. This training will include information about California legless lizard, western snowy plover, California least tern, ESHA, as well as other special status species potentially occurring in the project site.

The specifics of this program will include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the project site. A fact sheet conveying this information will also be prepared for distribution to all personnel involved with construction of the project. All personnel will sign a form provided by the trainer documenting they attended the WEAP and understand the information presented.

BIO-2 General Best Management Practices

General requirements that should be followed by project personnel are as follows:

- All food-related trash items such as wrappers, cans, bottles, and food scraps generated during proposed project should be disposed of in closed containers only and removed daily from the project site.

- Sand placement will not occur below the highest high tide line and will avoid placement on wrack.
- No deliberate feeding of wildlife should be allowed.
- No pets should be allowed on the project site.
- No firearms should be allowed on the project site.
- If vehicle or equipment maintenance is necessary, it should be performed in the designated staging areas at least 100 ft from ESHA.
- During project activities, heavy equipment should be operated in accordance with standard Best Management Practices (BMPs). All equipment used on-site should be properly maintained to avoid leaks of oil, fuel, or residues. Provisions should be in place to remediate any accidental spills.
- While encounters with special status species are not likely or anticipated, any personnel who inadvertently injure or kill a special status species or find one dead, injured, or entrapped should immediately report the incident to the City. The City should coordinate with a qualified biologist to determine species and if appropriate, the City should follow up with written notification to USFWS and/or CDFW within five working days of the incident.

BIO-3 Nesting Bird Avoidance

To avoid disturbance to nesting and special status birds, including raptor species protected by the MBTA and CFGC 3503, activities related to the project including, but not limited to, the use of heavy equipment in beach areas and ground disturbance will occur outside of the bird breeding season for migratory birds (generally February 1 through August 31), as feasible. If the project activities must be conducted during the breeding season, then a pre-activity nesting bird survey will be conducted no more than seven days prior to the use of heavy equipment in beach areas or ground disturbing activities.

If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) should be determined and demarcated by the biologist with bright orange construction fencing, flagging, or other means to mark the boundary. All project personnel should be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground-disturbing activities should occur inside this buffer until the avian biologist has confirmed breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer should occur only at the discretion of the qualified biologist.

BIO-4 Western Snowy Plover Avoidance

When project equipment enters the beach or ESHA, the following should be followed by project personnel.

- Vehicles should avoid operating in ESHA, with the exception of activities such as trash pick-up. Any trash pick-up within ESHA will be done by hand.

- Project activities will avoid ESHA, and vehicles should remain below a maximum 10 miles per hours speed limit and if western snowy plovers are encountered, the driver should back up at least 50 feet and/or alter their route to avoid flushing plovers.
- If active nests are observed, a refuge area should be created using symbolic fencing or another barrier deemed suitable. The fencing should be erected in a 300-ft diameter around the traditional center of the plover's roosting area and signage should be placed on the barrier.
- Any wrack encountered on the beach should be left in place.
- As described in BIO-1, all project personnel would be provided a specific training in the identification and ecological characteristics of western snowy plover. The training would also include a fact sheet conveying this information along with other commonly encountered shorebirds.

5.2 Sensitive Plant Communities, Environmentally Sensitive Habitats, and Critical Habitat

The proposed project would not result in the direct removal of ESHA. The proposed project would temporarily encroach into the 100-foot ESHA buffer but direct impacts to the sensitive vegetation and ESHA would be avoided.

Potential indirect impacts from the project, such as dust from project activities would be minimized through implementation of Avoidance and Minimization Measures BIO-1 and BIO-2 and BIO-5 would further reduce potential impacts to sensitive habitats and would help protect against any future adverse impacts to ESHA.

Designated critical habitat for Ventura marsh milk-vetch occurs 100 ft north of the project site. The species has a very specialized habitat, including coastal dunes, coastal scrub, and marshes and swamps (edges, coastal salt or brackish) which do not occur within the survey area. Based on the historical occurrence and lack of habitat in the survey area, this species is not expected in the project site, and the habitat components required for the species are not expected to be impacted.

The western snowy plover has designated critical habitat along the unvegetated sand beach and dune mat vegetation community areas within the survey area. The project, as designed, has clearly delineated the project site which would aid in avoiding critical habitat and, with implementation of BIO-1 through BIO-4, western snowy plover and its designated critical habitat would not be adversely modified.

Avoidance and Minimization Measures

BIO-5 ESHA Avoidance

During project activities, the project areas would be clearly delineated in the field to prevent direct impacts outside of designated areas and at minimum a 10-foot buffer will be maintained from any vegetated area or areas exhibiting dune morphology, as feasible.

5.3 Jurisdictional Areas

The proposed project would not occur within potentially jurisdictional features, including wetlands, waters of the U.S. or State, or riparian habitats. Additionally, implementation of Avoidance and Minimization Measures BIO-1 and BIO-2 would reduce any potential impacts to jurisdictional areas within 100 ft of project activities.

5.4 Wildlife Movement

The project does not occur within any migratory wildlife corridors and implementation of the project would not impede movement of wildlife species or the use of wildlife nursery sites. Small-scale movement routes are present in the project site (i.e., dunes). However, these are not regionally significant, and species will be able to use habitats adjacent to the project site for movement during project activities. Potential impacts would be temporary and localized, and would not change the area in the long term. Impacts to wildlife movement would be avoided.

5.5 Local Policies and Ordinances

The proposed project as designed would be compliant with City policies and ordinances. The specific coastal development and resource standards provided in Local Coastal Policy 6 are applicable and addressed below.

Local Coastal Policy 6

The project is intended to maintain streets and public access areas for public safety and would not include unauthorized motor vehicles in sensitive areas. The project's purpose is to maintain public access and recreational opportunities for all people consistent with public safety needs and the needs to protect public rights, rights of private property owners, and natural resource areas from overuse. The project would be temporary and would minimize impacts to the extent feasible. The project would remove sand from established paths and streets to minimize the disturbance of dune habitat in adjacent areas. By maintaining established paths, it would help reduce cross country travel and direct the public to use established paths rather than transiting through dune habitat.

No new development or removal of native vegetation is proposed. The project may temporarily encroach into the 100-foot ESHA buffer. An ESHA buffer reduction is recommended due to the temporary nature of the project and for the purposes of maintaining public safety. The project is anticipated to require sand redeposition once every two weeks, or more frequently during significant storm events and would only temporarily enter ESHA buffers.

The project as designed would adhere to Local Coastal Policy 6 and the implementation of Avoidance and Minimization Measure BIO-5 would reduce potential indirect impacts to ESHA.

5.6 Habitat Conservation Plans

The survey area does not occur within any Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan areas. The proposed project would not conflict with the provisions of any such plans. Therefore, the

proposed project would not conflict with HCP, NCCP, or other approved local, regional, or state habitat conservation plans.

6 Limitations, Assumptions, and Use Reliance

This Biological Resources Assessment has been performed in accordance with professionally accepted biological investigation practices conducted at this time and in this geographic area. The biological investigation is limited by the scope of work performed. Reconnaissance biological surveys for certain taxa may have been conducted as part of this assessment but were not performed during a particular blooming period, nesting period, or particular portion of the season when positive identification would be expected if present, and therefore, cannot be considered definitive. The biological surveys are limited also by the environmental conditions present at the time of the surveys. In addition, general biological (or protocol) surveys do not guarantee that the organisms are not present and will not be discovered in the future within the site. In particular, mobile wildlife species could occupy the site on a transient basis or re-establish populations in the future. Our field studies were based on current industry practices, which change over time and may not be applicable in the future. No other guarantees or warranties, expressed or implied, are provided. The findings and opinions conveyed in this report are based on findings derived from site reconnaissance, jurisdictional areas, review of CNDDB RareFind5, and specified historical and literature sources. Standard data sources relied upon during the completion of this report, such as the CNDDB, may vary with regard to accuracy and completeness. In particular, the CNDDB is compiled from research and observations reported to CDFW that may or may not have been the result of comprehensive or site-specific field surveys. Although Rincon believes the data sources are reasonably reliable, Rincon cannot and does not guarantee the authenticity or reliability of the data sources it has used. Additionally, pursuant to our contract, the data sources reviewed included only those that are practically reviewable without the need for extraordinary research and analysis.

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Appendix A

Regulatory Setting

Regulatory Setting

Special-status habitats are vegetation types, associations, or sub-associations that support concentrations of special-status plant or animal species, are of relatively limited distribution, or are of particular value to wildlife.

Listed species are those taxa that are formally listed as endangered or threatened by the federal government (e.g., U.S. Fish and Wildlife Service [USFWS]), pursuant to the Federal Endangered Species Act (FESA) or as endangered, threatened, or rare (for plants only) by the State of California (i.e., California Fish and Game Commission), pursuant to the California Endangered Species Act or the California Native Plant Protection Act. Some species are considered rare (but not formally listed) by resource agencies, organizations with biological interests/expertise (e.g., Audubon Society, CNPS, The Wildlife Society), and the scientific community.

The following is a brief summary of the regulatory context under which biological resources are managed at the federal, state, and local levels. A number of federal and state statutes provide a regulatory structure that guides the protection of biological resources. Agencies with the responsibility for protection of biological resources within the project site include:

- U.S. Army Corps of Engineers (wetlands and other waters of the United States);
- Los Angeles Regional Water Quality Control Board (waters of the State);
- U.S. Fish and Wildlife Service (federally listed species and migratory birds);
- California Department Fish and Wildlife (riparian areas, streambeds, and lakes; state-listed species; Species of Special Concern; nesting birds);
- California Coastal Commission; and
- City of Oxnard 2030 General Plan
- Coastal Permit Procedures Section 17-57
- Coastal Land Use Plan.

U.S. Army Corps of Engineers

Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers (USACE) has authority to regulate activities that could discharge fill of material into wetlands or other “waters of the United States.” Perennial and intermittent creeks are considered waters of the United States if they are hydrologically connected to other jurisdictional waters (typically a navigable water). The USACE also implements the federal policy embodied in Executive Order 11990, which is intended to result in no net loss of wetland value or acres. In achieving the goals of the Clean Water Act, the USACE seeks to avoid adverse impacts and offset unavoidable adverse impacts on existing aquatic resources. Any fill of wetlands that are hydrologically connected to jurisdictional waters would require a permit from the USACE prior to the start of work. Typically, when a project involves impacts to waters of the United States, the goal of no net loss of wetland acres or values is met through avoidance and

minimization to the extent practicable, followed by compensatory mitigation involving creation or enhancement of similar habitats.

Regional Water Quality Control Board

The State Water Resources Control Board (SWRCB) and the local Regional Water Quality Control Board (RWQCB) have jurisdiction over "waters of the State," pursuant to the Porter-Cologne Water Quality Control Act, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to "isolated" waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction). The RWQCB administers actions under this general order for isolated waters not subject to federal jurisdiction, and is also responsible for the issuance of water quality certifications pursuant to Section 401 of the Clean Water Act for waters subject to federal jurisdiction.

United States Fish and Wildlife Service

The USFWS implements the Migratory Bird Treaty Act (16 United States Code [USC] Section 703-711) and the Bald and Golden Eagle Protection Act (16 USC Section 668). The USFWS and National Marine Fisheries Service (NMFS) share responsibility for implementing the Federal Endangered Species Act (FESA) (16 USC § 153 et seq.). Generally, the USFWS implements the FESA for terrestrial and freshwater species, while the NMFS implements the FESA for marine and anadromous species. Projects that would result in "take" of any federally threatened or endangered species are required to obtain permits from the USFWS or NMFS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of the FESA, depending on the involvement by the federal government in permitting and/or funding of the project. The permitting process is used to determine if a project would jeopardize the continued existence of a listed species and what measures would be required to avoid jeopardizing the species. "Take" under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Proposed or candidate species do not have the full protection of the FESA; however, the USFWS and NMFS advise project applicants that they could be elevated to listed status at any time.

California Department of Fish and Wildlife

The California Department of Fish and Wildlife (CDFW) derives its authority from the Fish and Game Code of California. The California Endangered Species Act (CESA) (Fish and Game Code Section 2050 et. seq.) prohibits take of state listed threatened or endangered. Take under CESA is restricted to direct mortality of a listed species and the law does not prohibit indirect harm by way of habitat modification. Where incidental take would occur during construction or other lawful activities, CESA allows the CDFW to issue an Incidental Take Permit upon finding, among other requirements, that impacts to the species have been minimized and fully mitigated.

The CDFW also enforces Sections 3511, 4700, 5050, and 5515 of the Fish and Game Code, which prohibits take of species designated as Fully Protected. The CDFW is not allowed to issue an Incidental Take Permit for Fully Protected species; therefore, impacts to these species must be avoided.

California Fish and Game Code sections 3503, 3503.5, and 3513 describe unlawful take, possession, or destruction of native birds, nests, and eggs. Section 3503.5 of the Code protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs. Section 3513 makes it a state-level office to take any bird in violation of the federal Migratory Bird Treaty Act. CDFW administers these requirements.

Species of Special Concern (SSC) is a category used by the CDFW for those species which are considered to be indicators of regional habitat changes or are considered to be potential future protected species. Species of Special Concern do not have any special legal status except that which may be afforded by the Fish and Game Code as noted above. The SSC category is intended by the CDFW for use as a management tool to include these species in special consideration when decisions are made concerning the development of natural lands. The CDFW also has authority to administer the Native Plant Protection Act (NPPA) (Fish and Game Code Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Effective in 2015, CDFW promulgated regulations (14 CCR 786.9) under the authority of the NPPA, establishing that the CESA's permitting procedures would be applied to plants listed under the NPPA as "Rare." With this change, there is little practical difference for the regulated public between plants listed under CESA and those listed under the NPPA.

Perennial, intermittent, and ephemeral streams and associated riparian vegetation, when present, also fall under the jurisdiction of the CDFW. Section 1600 *et seq*. of the Fish and Game Code (Lake and Streambed Alteration Agreements) gives the CDFW regulatory authority over activities that divert, obstruct, or alter the channel, bed, or bank of any river, stream or lake.

California Coastal Commission

The Coastal Act places a high priority on the protection of biological and natural resources. Strict limits are placed on development in ESH areas. The Coastal Act (Section 30107.5) defines Environmentally Sensitive Habitat Area as: "Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Very limited types of development are allowed in ESH areas and then only where there is no feasible less environmentally damaging alternative. and feasible mitigation measures have been adopted. In general, only land uses that are dependent on the habitat resources are allowable within ESH areas.

Local Jurisdiction

City of Oxnard 2030 General Plan

The City of Oxnard 2030 General Plan is the primary planning document for the City. It represents the community's collective vision for preserving and improving the quality of life in the City of Oxnard. Under Gov. Code Section 65302, State Planning and Zoning Law requires each county and city to adopt a comprehensive, long-term General Plan for the physical development of a county or city and any land outside its boundaries which, in its judgment, bears relation to its planning (i.e., sphere of interest). The General Plan contains well-established goals and policies for environmental resources, including the following:

Goal ER-1 Protection of Natural and Cultural Resources

- **ER-1.1 Protect Oxnard's Natural and Cultural Resources.** Protect the City's natural resource areas, fish and wildlife habitat, scenic areas, open space areas, parks, and cultural and historic resources from unnecessary encroachment or harm and if encroachment or harm is necessary, fully mitigate the impacts to the maximum extent feasible.

Goal ER-2 Biological and Habitat Resources

- **ER-2.2 Designation and Protection of Sensitive Habitat Areas.** Evaluate existing and potential sensitive habitat areas (Environmentally Sensitive Habitat Area in the Coastal Zone – ESHA) as resource protection or open space land uses.

Goal ER-4 Sensitive Habitat Areas

- **ER-4.1 Encourage Protection of Sensitive Habitat.** Identify and encourage protection of sensitive areas, with attention to habitat that may span small parcels.
- **ER-4.2 Limiting Activities in Sensitive Areas.** Limit the recreational activities in open space areas with sensitive habitats to those activities that have minimal impact.
- **ER-4.4 Loss of Sensitive Habitats.** Consider loss of sensitive habitats due to be a significant environmental impact. All development that is proposed to disturb or remove sensitive habitat shall demonstrate appropriate feasible mitigation.
- **ER-4.5 Planning in Sensitive Areas.** Require careful planning of new development in or near areas that are known to have particular value for biological resources to maintain sensitive vegetation and wildlife habitat

City of Oxnard Coastal Permit Procedures Sec. 17-57

The following types of development are exempt from the requirement for a development review permit or coastal development permit, and are permitted, subject to the issuance of a zone clearance where appropriate:

- Repair and maintenance activities that do not result in addition to or enlargement or expansion of the object of such repair or maintenance activity, or which do not include extraordinary methods of repair and maintenance described in Section 13252(1)(A), (B), (C), and (D), 13252(2)(A), (B), and (C), and 13252(3)(A) and (B) of the California coastal regulations.
- Installation, testing, placement in service or replacement of any necessary utility connection between an existing service facility and any development that has been granted a coastal development permit.

A development permit is required of all development not classified as categorically exempt, excluded development, emergency permit, or subject to a coastal development permit. The City shall determine whether a development is exempt at the time the application for development within the coastal zone is submitted. The determination shall be made with reference to the County's Coastal Area Plan and the City's Coastal Land Use Plan, including any maps, categorical exclusions, land use

designations and the original permit and appeals jurisdiction map adopted by the coastal commission.

City of Oxnard Coastal Land Use Plan

3.2.2 Habitat Areas

30240(b) Development in areas adjacent to environmentally sensitive habitat areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Sand dunes are found in five areas of the coastal zone, including a 26-acre area of dunes at the intersection of Fifth Street and North Harbor Blvd. As part of the Phase III Implementation portion of the LCP process, a resource protection ordinance was created and incorporated the following policies which the City implements:

- In sand dune area, foot traffic shall be minimized, and allowed only on established paths or boardwalks. Development shall be designed and sites to minimize impacts to the sensitive resource areas. Permitted uses shall not be allowed to significantly disrupt habitat value.
- Disturbance or destruction of any dune vegetation shall be prohibited unless no feasible alternative exists and then only when revegetation with native California plants is a condition of approval.
- When a development is proposed within or near an environmentally sensitive habitat area, applicable topographic, vegetative and soils information shall be provided. The information shall include physical and biological features existing in the habitat areas.

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Appendix B

Site Photographs



Photograph 1. Access and sand removal site at the corner of West 5th Street and Mandalay Beach Road (aspect south; July 20, 2021).



Photograph 2. View of sand placement site at West 5th Street and Mandalay Beach Road (aspect east, July 20, 2021).



Photograph 3. View of sand source site at Mandalay Beach Road and Seabreeze Way (aspect west; July 20, 2021).



Photograph 4. View of sand removal site at the corner of West 5th Street and Capri Way (aspect southwest; July 20, 2021).



Photograph 5. View of sand placement and work area at Neptune Square (aspect south; July 20, 2021).



Photograph 6. View of access and sand removal site at the southern end of Marine Way (aspect west; July 20, 2021).



Photograph 7. View of sand placement site at the southern end of Marine Way (aspect west; July 20, 2021).



Photograph 8. View of access and sand removal site at Oxnard Beach Park (aspect east; July 20, 2021).



Photograph 9. View of access and sand removal site at Oxnard Beach Park (aspect north; July 20, 2021).



Photograph 10. Potential coastal wetland west of access and sand removal site within Oxnard Beach Park (aspect west; July 20, 2021).



Photograph 11. View of access and sand removal site at Oxnard Shores parking lot (aspect south; July 20, 2021).



Photograph 12. View of work area and sand placement site west of Oxnard Shores parking lot (aspect west; July 20, 2021).



Photograph 13. View of access, sand removal and work area at Oxnard Shores parking lot (aspect west; July 20, 2021).



Photograph 14. View of sand removal site at Channel View Park (aspect east; July 20, 2021).

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Appendix C

Floral and Faunal Compendium

Plant Species Observed Within the Survey Area on July 20, 2021

Abronia umbellata	pink sand verbena	–	Native
Ambrosia chamissonis	beach bur	–	Native
Ammophila arenaria	European beach grass	–	Introduced[3]
Baccharis pilularis	coyote brush	–	Native
Bromus madritensis ssp. *rubens*	red brome	–	Introduced[3]
Cakile maritima	European sea rocket	–	Introduced[1]
Camissoniopsis cheiranthifolia	beach evening-primrose	–	Native
Carduus pycnocephalus	Italian thistle	–	Introduced[2]
Carex sp.	sedge	–	Native
Carpobrotus edulis	ice plant	–	Introduced[3]
Cuscuta spp.	dodder	–	Native
Croton californicus	California croton	–	Native
Cynodon dactylon	Bermuda grass	–	Introduced[2]
Distichlis spicata	saltgrass	–	Native
Ericameria ericoides	mock heather	–	Native
Heliotropium curassavicum	seaside heliotrope	–	Native
Heterotheca grandiflora	telegraphweed	–	Native
Heterotheca sessiliflora ssp. *echioides*	sessileflower false goldenaster	–	Native
Hirschfeldia incana	short-pod mustard	–	Introduced[2]
Isocoma menziesii	Menzies' goldenbush	–	Native
Juncus effusus	soft rush	–	Native
Myoporum laetum	ngaio tree	–	Introduced[2]
Polypogon monspeliensis	rabbit's-foot grass	–	Introduced[1]
Pseudognaphalium californicum	California cudweed	–	Native
Salix lasiolepis	arroyo willow	–	Native
Washingtonia robusta	Mexican fan palm	–	Introduced

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California Native Plant Society. A Manual of California Vegetation Online. Accessed online at http://vegetation.cnps.org/. June 2020

[1] Cal-IPC – Limited; these species are invasive with ecological amplitude and distribution being generally limited, but these species may be locally persistent and problematic.

[2] Cal-IPC – Moderate; these species have substantial and apparent-but generally not severe-ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal.

[3] Cal-IPC – High; These species have severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. Most are widely distributed ecologically.

Animal Species Observed Within the Survey Area on July 20, 2021

Birds			
Corvus brachyrhynchos	American crow	–	native
Larus occidentalis	western gull	–	native
Limosa fedoa	marbled godwit	–	native
Hirundo rustica	barn swallow	–	native
Sayornis nigricans	black phoebe	–	native
Melospiza melodia	song sparrow	–	native
Reptiles			
Uta stansburiana	side-blotched lizard	–	native
Sceloporus occidentalis	fence lizard	–	native

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Appendix D

Special Status Species Evaluation Tables

Special Status Plant and Animal Species in the Regional Vicinity of the Project Site

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
Plants				
Abronia maritima red sand-verbena	None/None G4/S3? 4.2	Perennial herb. Blooms Feb-Nov. Occurs in coastal dunes of central and southern California, as well as the Channel Islands. Formerly fairly widespread, but available habitat has decreased, especially in Southern California. Under 100m (330ft).	Low Potential.	Elements of habitat are present in the survey area in the form of dune habitat. The dune habitat is surrounded by development and the field survey was conducted within the bloom period and individuals were not observed.
Astragalus pycnostachyus var. *lanosissimus* Ventura Marsh milk-vetch	FE/SE G2T1/S1 1B.1	Coastal dunes, coastal scrub, marshes and swamps. Within reach of high tide or protected by barrier beaches, more rarely near seeps on sandy bluffs. 1-35m. Blooms (Jun)Aug-Oct.	No Potential.	Marginal habitat is present in the survey area in the form of arroyo willow thicket, dune habitat, and soft rush marsh vegetation communities. The dune habitat is frequently disturbed by foot traffic and is surrounded by development lacking the specialized habitat requirements for the species. The soft rush marsh is isolated from the high tide and does not provide dynamic alluvial habitat required by the species. This species is highly distinguishable and requires undisturbed habitat. The specialized habitat requirements and individuals were not observed within the project site during the field survey. There are 4 CNDDB occurrences within 5 miles of the survey area. All but one is presumed extirpated.
Atriplex serenana var. *davidsonii* Davidson's saltscale	None/None G5T1/S1 1B.2	Annual herb. Blooms April to October. Coastal bluff scrub, coastal scrub. Alkaline soil. 3-250m (10-820ft).	No Potential.	No suitable habitat is present within the survey area and outside elevation range. Not observed during field survey.
Chaenactis glabriuscula var. *orcuttiana* Orcutt's pincushion	None/None G5T1T2/S1 1B.1	Coastal bluff scrub, coastal dunes. Sandy sites. 0-100m. Blooms Jan-Aug.	Low Potential.	Elements of habitat are present within the survey area in the form of dune habitat. The dune habitat is highly disturbed by foot traffic and contains a prevalence of non-native species

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
				providing poor quality habitat. One occurrence within survey area but largely extirpated in 1961. Not observed during field survey.
Chloropyron maritimum ssp. *maritimum* salt marsh bird's-beak	FE/SE G4?T1/S1 1B.2	Occurs in coastal dunes and coastal salt marshes and swamps. This species blooms between May and October, and typically occurs at elevations ranging from 0-30 meters.	Low Potential.	Elements of habitat are present within the survey area in the form of dune habitat. The dune habitat is highly disturbed by foot traffic and contains a prevalence of non-native species. The species prefers upper elevations of tidal salt marsh habitat which is not present in the survey area. There are four CNDDB occurrences within 5 miles of the survey area. One is located on Ormond Beach. Three are presumed extirpated. Not observed during field survey.
Corethrogyne leucophylla branching beach aster	None/None G3Q/S3 3.2	Closed-cone coniferous forest, coastal dunes. 3-60m. Blooms May-Dec.	Low Potential.	Elements of habitat present in the survey area in the form of dune habitat. The dune habitat is frequently disturbed by foot traffic and is surrounded by development lacking the specialized habitat requirements for the species. The field survey was conducted within the bloom period and individuals were not observed.
Eleocharis parvula small spikerush	None/None G5/S3 4.3	Marshes and swamps. In coastal salt marshes. 1-3020m. Blooms (Apr)Jun-Aug (Sep).	Low Potential.	Elements of habitat are present in the survey area in the form of soft rush marsh vegetation community associated with a potentially jurisdictional coastal wetland. The soft rush marsh is isolated from the high tide and does not provide coastal salt marsh habitat. Suitable habitat and individuals were not observed within the survey area during the field survey.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
Juncus acutus ssp. *leopoldii* southwestern spiny rush	None/None G5T5/S4 4.2	Coastal dunes, marshes and swamps, meadows and seeps. Moist saline places. 3-900m. Blooms (Mar)May-Jun.	Low Potential.	Elements of habitat are present in the survey area in the form of dune habitat and soft rush marsh vegetation community. The dune habitat is frequently disturbed by foot traffic and is surrounded by development lacking the specialized habitat requirements for the species. The soft rush marsh is isolated from the high tide and does not provide a saline environment required by the species. Suitable habitat and individuals were not observed within the survey area during the field survey.
Lasthenia glabrata ssp. *coulteri* Coulter's goldfields	None/None G4T2/S2 1B.1	Annual herb. Blooms February to June. Coastal salt marshes, playas, valley and foothill grassland, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1400m (3-4595ft).	Low Potential.	Elements of habitat are present in the survey area in the form of soft rush marsh vegetation community associated with a potentially jurisdictional coastal wetland. The soft rush marsh is isolated from the high tide and does not provide coastal salt marsh habitat. Suitable habitat and individuals were not observed within the survey area during the field survey.
Malacothrix similis Mexican malacothrix	None/None G2G3/SH 2A	Coastal dunes. 0-40m. Blooms Apr-May.	No Potential.	Marginal habitat present in the survey area in the form of dune habitat. The dune habitat is frequently disturbed by foot traffic and is surrounded by development lacking the specialized habitat requirements for the species. There is one historical (1925) CNDDB occurrences within 5 miles of the survey area, likely extirpated. This species was last seen in 1925 at Hueneme Beach.
Pseudognaphalium leucocephalum white rabbit-tobacco	None/None G4/S2 2B.2	Chaparral, cismontane woodland, coastal scrub, riparian woodland. Sandy, gravelly	Low Potential.	Elements of habitat are present in the survey area in the form of dune habitat. The dune habitat provides sandy habitat

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
		sites. 0-2100m. Blooms (Jul) Aug- Nov (Dec).		required by the species but is frequently disturbed by foot traffic and is surrounded by development. The field survey was conducted within the bloom period and individuals were not observed.
Suaeda taxifolia woolly seablite	None/None G4/S4 4.2	Coastal bluff scrub, coastal dunes, marshes and swamps. Margins of salt marshes. 0-50m. Blooms Jan-Dec.	Low Potential.	Elements of habitat are present in the survey area in the form of dune habitat and soft rush marsh vegetation community. The dune habitat is frequently disturbed by foot traffic and is surrounded by development lacking the specialized habitat requirements for the species. The soft rush marsh is isolated from the high tide and does not provide a saline habitat required by the species. Suitable habitat and individuals were not observed within the survey area during the field survey.
Animals				
Invertebrates				
Bombus crotchii Crotch bumble bee	None/SCE G3G4/S1S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	Low Potential.	No suitable food plants were found within the survey area. There is one CNDDB occurrence located on McGrath State Beach from 2012 approximately 2 miles north of the survey area.
Cicindela hirticollis gravida sandy beach tiger beetle	None/None G5T2/S2	Inhabits areas adjacent to non-brackish water along the coast of California from San Francisco Bay to northern Mexico. Clean, dry, light-colored sand in the upper zone. Subterranean larvae prefer moist sand not affected by wave action.	No Potential.	There are two historical (1970) CNDDB occurrences, one located on McGrath State Beach, abundant on sand bars along McGrath Lake and the second was possibly near Port Hueneme. Frequent human disturbance likely precludes this species from the survey area.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
Coelus globosus globose dune beetle	None/None G1G2/S1S2	Inhabitant of coastal sand dune habitat; erratically distributed from Ten Mile Creek in Mendocino County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks; it burrows beneath the sand surface and is most common beneath dune vegetation.	Low Potential.	Low quality habitat is present within the survey area. There are two historical (1926 and 1954) CNDDB records within the survey area and one recent occurrence where 20 adults and 2 larvae were observed on Mandalay County Park and Mandalay Generating Station on April 14, 2017. The CNDDB occurrence states that the species appears to be common along this stretch of coastline. Frequent human disturbance likely precludes this species from the survey area.
Danaus plexippus pop. 1 monarch - California overwintering population	FC/None G4T2T3/S2S3	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Low Potential.	There are no known roosting sites within the survey area and the project site does not support suitable tree groves for roosting.
Tryonia imitator mimic tryonia (California brackishwater snail)	None/None G2/S2	Inhabits coastal lagoons, estuaries and salt marshes, from Sonoma County south to San Diego County. Found only in permanently submerged areas in a variety of sediment types; able to withstand a wide range of salinities.	No Potential.	No suitable habitat is present within the survey area.
Fish				
Catostomus santaanae Santa Ana sucker	FT/None G1/S1	Endemic to Los Angeles Basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, and algae.	No Potential.	No suitable habitat is present within the survey area.
Eucyclogobius newberryi tidewater goby	FE/None G3/S3	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly	No Potential.	No suitable habitat is present within the survey area.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
		still but not stagnant water and high oxygen levels.		
Reptiles				
Anniella stebbinsi Southern California legless lizard	None/None G3/S3 SSC	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.	Moderate Potential.	Low quality habitat, due to development, is present within survey area. Six CNDDB occurrences are recorded within the survey area.
Emys marmorata western pond turtle	None/None G3G4/S3 SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	No Potential.	No suitable habitat is present within the survey area.
Phrynosoma blainvillii coast horned lizard	None/None G3G4/S3S4 SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	Low Potential.	Low quality habitat, due to development, is present within survey area. Three CNDDB occurrences are recorded within the survey area during 1992 and 1995.
Birds				
Athene cunicularia burrowing owl	None/None G4/S3 SSC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Low Potential.	No suitable habitat or forage food within survey area. One CNDDB occurrence recorded north of project site within McGrath State Beach Campgrounds in 2002.
Charadrius nivosus nivosus western snowy plover	FT/None G3T3/S2 SSC	Sandy beaches, salt pond levees & shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	High Potential (foraging) / Low Potential (breeding).	Low quality habitat for breeding (highly disturbed sand beach) present within survey area. Five CNDDB records exists within 5 miles of the survey area. Critical

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
				habitat is designated on the beaches and dunes within the survey area. The beaches and sand dunes in Mandalay State Beach, McGrath State Beach, and Hollywood Beach support both wintering populations and breeding populations. Nesting season surveys are conducted in known breeding areas and are delineated with semipermanent or seasonal symbolic fencing (California State Parks 2013). The project site provides suitable habitat for foraging but breeding is unlikely to occur at the project site.
Coccyzus americanus occidentalis western yellow-billed cuckoo	FT/SE G5T2T3/S1	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	No Potential.	No suitable habitat is present within survey area. There are two historic CNDDB records within 5 miles of the survey area.
Falco peregrinus anatum American peregrine falcon	FD/SD G4T4/S3S4 FP	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	Low Potential.	There is one CNDDB nest record from 2017 located on the Mandalay power plant facility approximately one mile north of the survey area. The exact location of this nest is unclear based on the data provided in the CNDDB, but it is likely on the larger structures associated with the Mandalay facility.
Laterallus jamaicensis coturniculus California black rail	None/ST G3G4T1/S1 FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	No Potential.	One historical CNDDB record from 1936 and is likely extirpated.
Passerculus sandwichensis beldingi Belding's savannah sparrow	None/SE G5T3/S3	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County.	No Potential.	No suitable habitat is present within the survey area.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
		Nests in Salicornia on and about margins of tidal flats.		
Polioptila californica californica coastal California gnatcatcher	FT/None G4G5T3Q/S2 SSC	Obligate, permanent resident of coastal sage scrub below 2500 ft in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	No Potential.	No suitable habitat is present within the survey area. One occurrence is recorded within the survey area during 1906 and is now possibly extirpated.
Riparia riparia bank swallow	None/ST G5/S2	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	No Potential.	No suitable nesting habitat is present within the survey area. One historic CNDDB occurrence at the Santa Clara River Estuary.
Setophaga petechia yellow warbler	None/None G5/S3S4 SSC	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	No Potential.	No suitable nesting habitat is present within the survey area. There is one CNDDB occurrence within 5 miles of the survey area associated with the Santa Clara River.
Sternula antillarum browni California least tern	FE/SE G4T2T3Q/S2 FP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.	Moderate Potential.	The survey area contains low quality nesting habitat and nesting is unlikely to occur within the survey area. They are known to nest on the beach between the Santa Clara River and McGrath Lake north of the survey area. The project site is frequently disturbed which likely precludes the species from nesting.
Vireo bellii pusillus least Bell's vireo	FE/SE G5T2/S2	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.	Low Potential.	No suitable nesting habitat present within the survey area. Five CNDDB occurrences exist within 5 miles of the survey area. One individual was heard singing approximately one mile from the project site in 2009. One individual was heard and seen on the McGrath Parcel

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
				in a dense stand of willows immediately adjacent to North Harbor Blvd in 2016.
Mammals				
Antrozous pallidus pallid bat	None/None G4/S3 SSC	Found in a variety of habitats including deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live and dead trees which must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	No Potential.	No suitable habitat is present within survey area. There is one historic CNDDB record (1906) within 5 miles of the survey area.
Sensitive Natural Communities				
Coastal and Valley Freshwater Marsh	None/None G3/S2.1		Not Present.	Closest freshwater marsh habitat is McGrath Lake, approximately 1.5 miles north of the project site.
Southern Coastal Salt Marsh	None/None G2/S2.1		Not Present.	Closest salt marsh habitat is Santa Clarita river mouth, approximately 3 miles north of the project site.
Southern Riparian Scrub	None/None G3/S3.2		Not Present.	Closest riparian scrub habitat is Santa Clarita river mouth, approximately 3 miles north of the project site.

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations

Regional Vicinity refers to within a 5-mile search radius of site.

FE = Federally Endangered FT = Federally Threatened FC = Federal Candidate Species

SE = State Endangered ST = State Threatened

SSC = CDFW Species of Special Concern FP = State Fully Protected

CRPR (CNPS California Rare Plant Rank)

1A=Presumed Extinct in California

1B=Rare, Threatened, or Endangered in California and elsewhere

2A=Plants presumed extirpated in California, but more common elsewhere

2B=Plants Rare, Threatened, or Endangered in California, but more common elsewhere

CRPR Threat Code Extension

.1=Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)

.2=Fairly endangered in California (20-80% occurrences threatened)

.3=Not very endangered in California (<20% of occurrences threatened)

Appendix B

Sand Contamination Study



Oxnard Beach Sand Assessment

City of Oxnard Sand Management Plan Project
Ventura County, California

prepared for

City of Oxnard

prepared by

Rincon Consultants, Inc.

April 12, 2022

April 12, 2022
Project No.: 21-11153

Brian J. Yanez
Assistant Public Works Director
City of Oxnard
305 West Third Street, East Wing, Third Floor
Oxnard, California 93030
Via email: brian.yanez@oxnard.org

Subject: Oxnard Beach Sand Assessment
City of Oxnard Sand Management Plan Project, Ventura County, California

Dear Mr. Yanez:

We are pleased to submit this Sand Assessment report for the City of Oxnard Sand Management Plan Project in Ventura County, California. The Sand Assessment was performed in accordance with our proposal dated February 17, 2022. The objective of the Sand Assessment was to evaluate the presence of potential contaminants of concern (COC) in wind-blown sand that has accumulated on public streets and public access points, and determine if the sand has COCs at concentrations that would prevent it from being suitable for placement back on the beach due to a potential impact to human health.

If you have any questions, or if we can be of any future assistance, please contact us.

Sincerely,
Rincon Consultants, Inc.

R. Scott English, RME
Senior Program Manager

Julie Doane-Allmon, PG
Senior Program Manager, PG #9252

Sarah Larese
Senior Environmental Scientist

Table of Contents

Introduction and Background 1
Purpose and Scope 6
Purpose 6
Scope 6
Sand Assessment 7
Site Reconnaissance 7
Sand Sampling and Analysis Methodology 7
Regulatory Setting and Screening Levels 12
Analytical Results 13
Sand Sample Analytical Results 13
Conclusions 15
Recommendations 16
Limitations 17
References 18

Tables Included in Text

Table I Sand Removal Areas and Sand Source Areas -Sampling Locations / Analytes 7
Table II Summary of Detected Concentrations of Arsenic 13
Table III Summary of Detected Concentrations of TPH 14
Table IV Summary of Detected Concentrations of OCPs 14

Tables Included as Attachments

Table 1 Sand Sample Analytical Results – Metals
Table 2 Sand Sample Analytical Results – TPH, OCPs, PCBs and PNAs

Figures

Figure 1 Sand Removal Area 1 - Fifth to Seabreeze 2
Figure 2 Sand Removal Area 2-Seabreeze to Oxnard Beach Park 3
Figure 3 Sand Removal Area 3 - Oxnard Beach Park to Channel Islands MHP 4
Figure 4 Sand Removal Area 4 - La Granada Street to Harbor Channel 5

Photographs

Photographs 1-4 10

Photographs 5-8 11

Appendices

Appendix A Laboratory Analytical Report

Introduction and Background

Rincon Consultants, Inc. (Rincon) performed a Sand Assessment for the City of Oxnard Sand Management Plan Project located in Ventura County, California (site – Figures 1-4).

The City of Oxnard Public Works Department (PWD) is proposing the redeposition of wind-blown sand from public streets and public access points to maintain safe access to the coast while protecting fragile coastal resources. Windblown sand currently accumulates on vacant private lots and undeveloped beach areas (sand source sites) with deposits becoming relatively high and moving from the sand source sites to the streets, public access points and parking lots (sand removal areas), resulting in slippery and unsafe conditions for pedestrians, bicyclists, and motorists.

The City of Oxnard PWD will be applying for a Coastal Development Permit (CDP) from the City of Oxnard Planning Department and appealable to the California Coastal Commission (CCC). A draft Project Description was presented to the CCC on September 13, 2021 and the CCC provided the City of Oxnard PWD the following comment relating to water quality:

> Sand that is removed from the roadways can potentially contain contaminants and trash/debris. How does the City propose to address this issue? Will the collected sand be tested to ensure that there are no contaminants and that the material is suitable for placement back on the beach?

The City of Oxnard PWD proposes to proactively relocate sand from public streets and public access points to provide safe access for vehicles, bicycles and pedestrians. Immediately after the sand has been redeposited at the sand placement areas of the beach, a tractor with a sand cleaning attachment and groom will be used to remove any debris or trash. A street sweeper may be utilized along the sand removal areas, and all material collected will be transported to a landfill.

To address the specific comment regarding contaminants, the City of Oxnard PWD proposed a Sand Contamination Study (Sand Assessment) including a site reconnaissance survey and sand sampling event. The intent of sampling the sand was to evaluate the presence of potential contaminants of concern (COC) and determine if the sand that accumulates has COCs at concentrations that would prevent it from being suitable for placement back on the beach due to a potential impact to human health.

The City of Oxnard PWD plans to remove sand that has accumulated on the streets from the following project areas (sand removal areas):

1. Fifth to Seabreeze
2. Seabreeze to Oxnard Beach Park
3. Oxnard Beach Park to Channel Islands MHP
4. La Granada Street to Harbor Channel

This Sand Assessment scope of work has been conducted to address the specific CCC comment regarding potential COCs in the sand removal areas.

Figure 1 Sand Removal Area 1 - Fifth to Seabreeze



Figure 2 Sand Removal Area 2-Seabreeze to Oxnard Beach Park

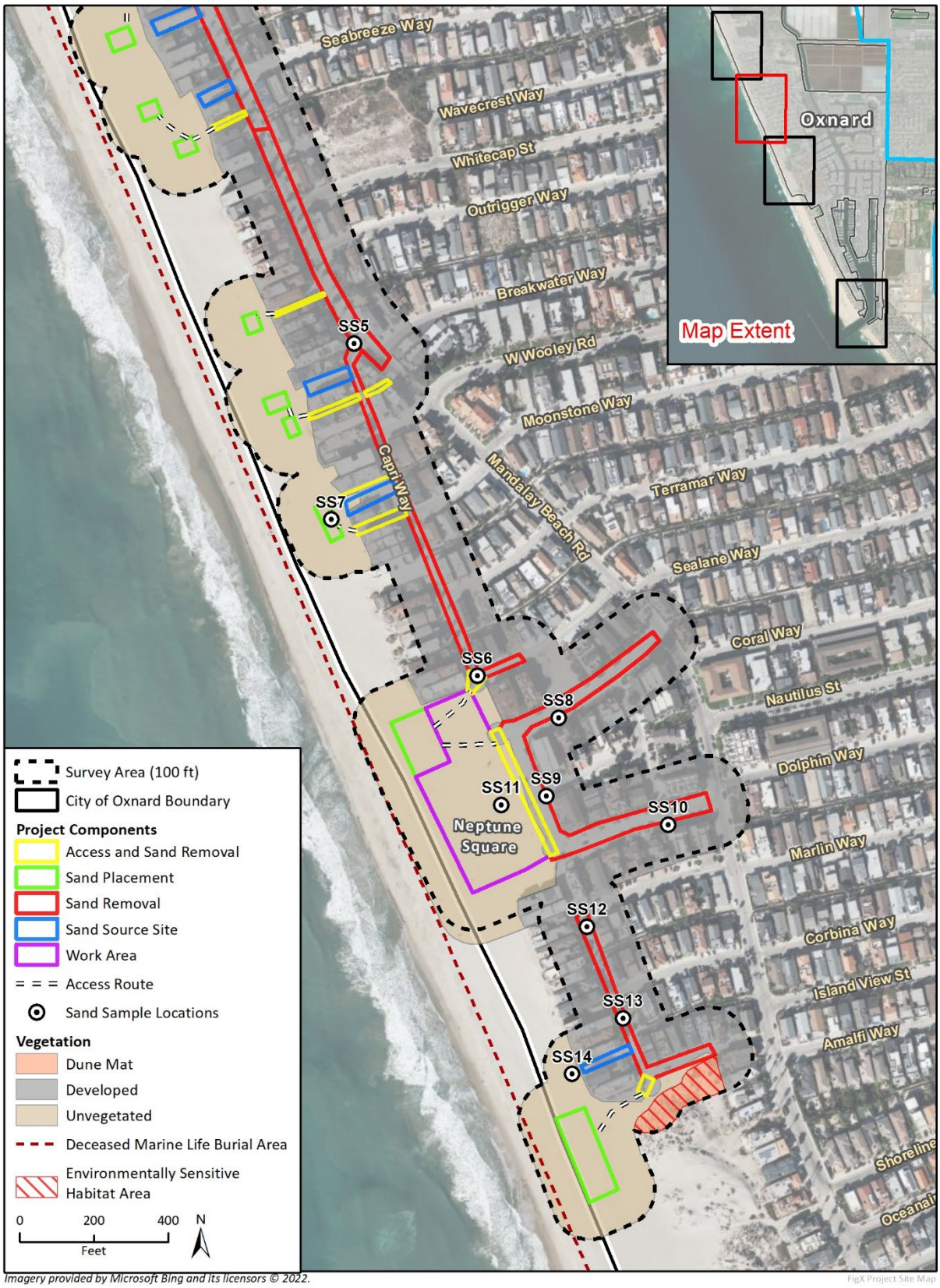


Figure 3 Sand Removal Area 3 - Oxnard Beach Park to Channel Islands MHP

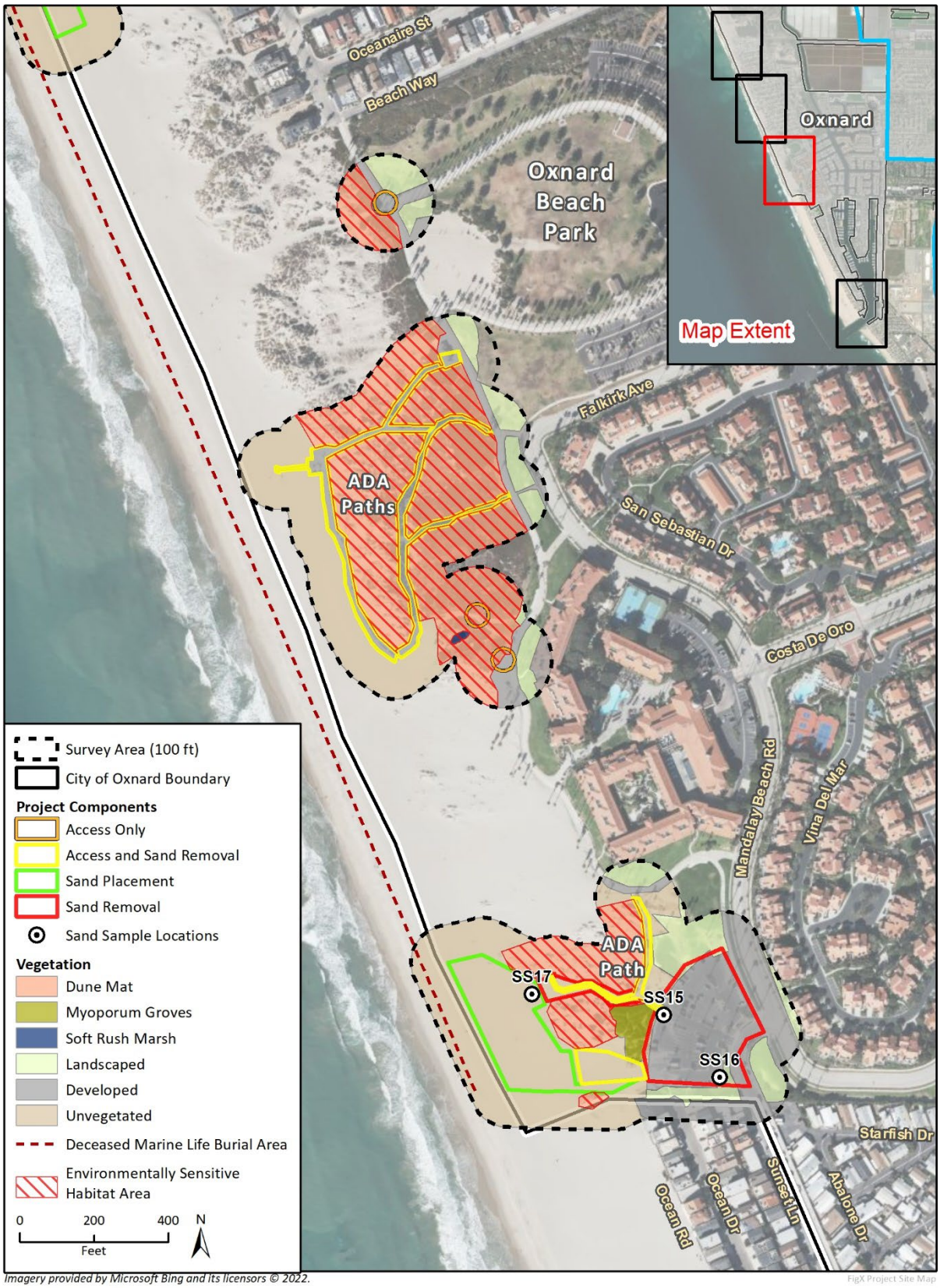
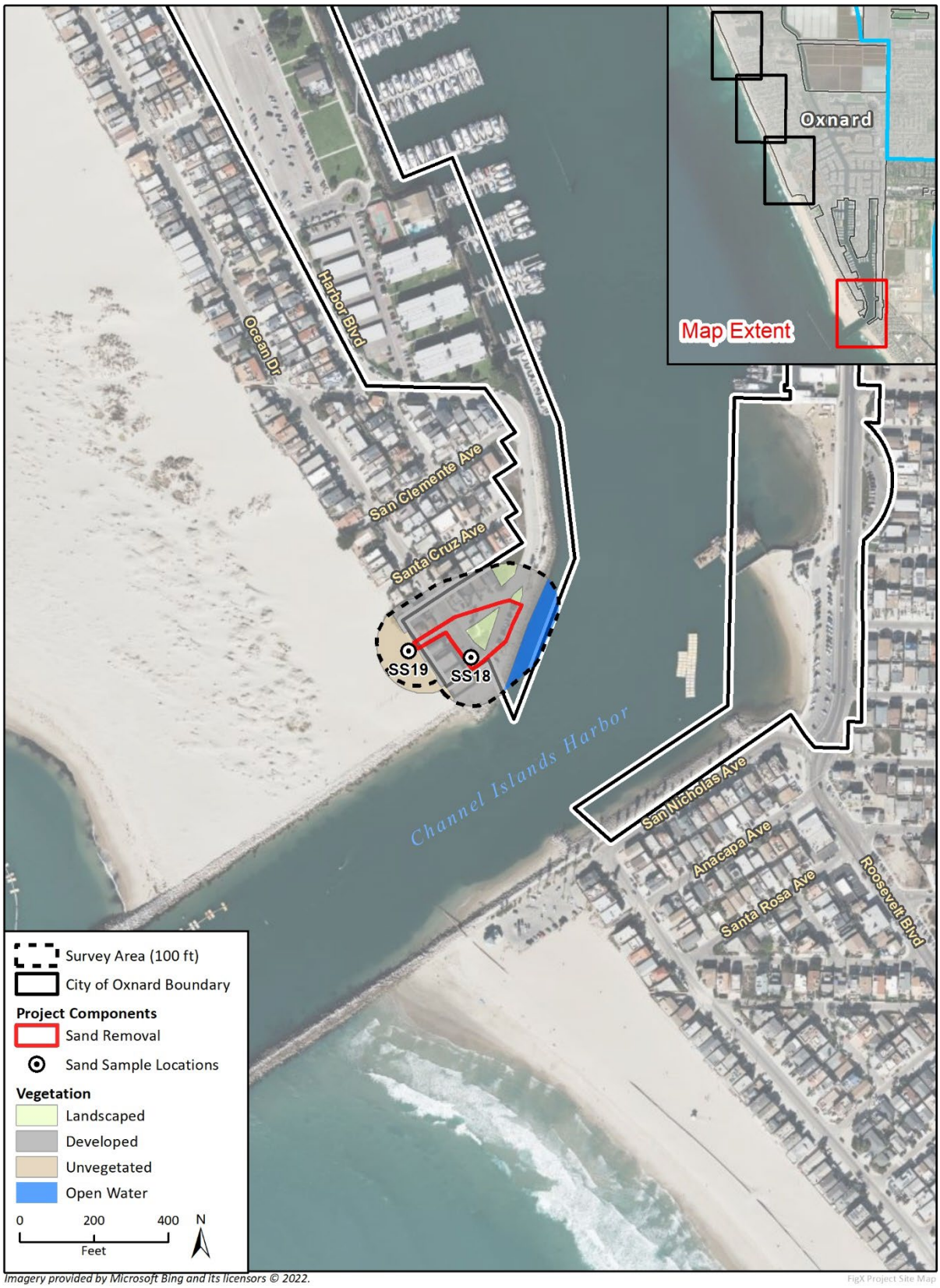


Figure 4 Sand Removal Area 4 - La Granada Street to Harbor Channel



Purpose and Scope

Purpose

The intent of sampling the sand is to evaluate the presence of potential COCs in wind-blown sand that has accumulated on public streets and public access points, and to determine if the sand that accumulates has COCs at concentrations that would prevent it from being suitable for placement back on the beach due to a potential impact to human health.

Scope

The scope of work associated with the Sand Assessment included the following:

- Prepare a site-specific Health & Safety Plan (HASP)
- Conduct a site reconnaissance to identify sand sampling locations from the following sand removal areas:
    1. Fifth to Seabreeze
    2. Seabreeze to Oxnard Beach Park
    3. Oxnard Beach Park to Channel Islands MHP
    4. La Granada Street to Harbor Channel
- Identify the sand source sites and sampling locations within these sand source sites during the site reconnaissance.
- Collect 13 sand samples from the sand removal areas (SS1-SS3, SS5-SS6, SS8-SS10, SS12-SS13, SS15-SS16, and SS18) and six sand samples from the sand source sites (SS4, SS7, SS11, SS14, SS17, and SS19) directly into glass containers provided by the analytical laboratory at the locations shown on Figures 1-4.
- Analyze sand samples for the following COCs:
    - Total petroleum hydrocarbons (TPH)
    - CAM metals (CCR Title 22 metals)
    - Polychlorinated biphenyls (PCBs)
    - Polynuclear Aromatic Hydrocarbons (PNAs)
    - Organochlorine pesticides (OCPs)
- Evaluate laboratory analytical results and comparing analyte concentrations to applicable human health Environmental Screening Levels (ESLs) established by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), Screening Levels (SLs) established by the Department of Toxic Substance Control (DTSC), and effects range low (ERL) and effects range median (ERM) used to evaluate the toxicity in marine sediment. [1]
- Report findings of the Sand Assessment investigation

[1] Analytical results were compared to San Francisco Bay Regional Water Quality Control Board (SFB RWQCB) Tier 1 ESLs, revised July 2019, as well as Department of Toxic Substance Control (DTSC) residential exposure Screening Levels (SLs), revised June 2020, and Long, et al, 1995, effects range low (ERL) and effects range median (ERM) used to evaluate the toxicity in marine sediment

Sand Assessment

Site Reconnaissance

Prior to collecting sand samples at the proposed sand removal areas and sand source sites on March 16, 2022, a site reconnaissance survey was conducted to identify suitable sampling locations, such as areas with large sand deposits, low lying areas that could accumulate contaminants, potential sediment source areas (storm drains, etc.), and other areas that may accumulate contaminants such as intersections or where idling or parked vehicles may be located.

During the site reconnaissance, accumulated sand was observed in the following sand removal areas:

1. Fifth to Seabreeze
2. Seabreeze to Oxnard Beach Park
3. Oxnard Beach Park to Channel Islands MHP
4. La Granada Street to Harbor Channel

Sand Sampling and Analysis Methodology

On March 16, 2022, 13 sand samples were collected from the sand removal areas (SS1-SS3, SS5-SS6, SS8-SS10, SS12-SS13, SS15-SS16, and SS18) and six sand samples were collected from the sand source sites (SS4, SS7, SS11, SS14, SS17, and SS19) at the locations shown on Figures 1-4 and summarized on Table I below. Sand samples were collected from the areas identified during the site reconnaissance as follows:

- Thirteen samples were collected from the sand removal areas.
- Six samples were collected from vacant lots or beach areas adjacent to the removal sites (sand source area) to serve as base-line samples.

A total of 19 sand samples were collected.

Table I Sand Removal Areas and Sand Source Areas -Sampling Locations / Analytes

Sand Removal Area	Sand Sample Location	Sample ID	Analytes
Sand Removal Area 1 - Fifth to Seabreeze			
1	Sand Removal Area: Southside of West 5th Street, 600 feet west of Harbor	SS1	
1	Sand Removal Area: Mandalay Beach Road between West 5th Street and Seabreeze Way	SS2, SS3	
1	Sand Source Area: on beach near empty lot on westside of Mandalay Beach Road between West 5th Street and Channel Way (683 Mandalay Beach Road)	SS4	

Sand Removal Area	Sand Sample Location	Sample ID	Analytes
Sand Removal Area 2 - Seabreeze to Oxnard Beach Park			
2	Sand Removal Area: Westside of Capri Street between Seabreeze Way and Neptune Square	SS5, SS6	TPH by EPA Method 8015M Title 22 Metals by EPA Method 6010B/7471A PCBs by EPA Method 8082 PNAs by EPA Method 8270C SIM OCPS by EPA Method 8081A
2	Sand Removal Area: within Neptune Square	SS8, SS9, SS10	
2	Sand Source Area: Empty lot on westside of Capri Way between West Wooley Road and Moonstone Way (between 1135 and 1145 Capri Way)	SS7, SS11	
2	Sand Removal Area: Marina Way between Marlin Way and Amalfi Way	SS12, SS13	
2	Sand Source Area: on beach near empty lot on westside of Marina Way between Corbina Way and Amalfi Way (between 1455 and 1461 Marina Way)	SS14	
Sand Removal Area 3 - Oxnard Beach Park to Channel Islands MHP			
3	Sand Removal Area: Westside of Sunset Lane and Mandalay Beach Drive (parking lot)	SS15, SS16	
3	Sand Source Area: Oxnard Shores (west of parking lot and ADA path)	SS17	
Sand Removal Area 4 - La Granada Street to Harbor Channel			
4	Sand Removal Area: Parking lot between Santa Cruz Avenue and Channel Islands Harbor	SS18	
4	Sand Source Area: on beach west of parking lot between Santa Cruz Avenue and Channel Islands Harbor	SS19	

Once the sampling locations were identified, sand samples were collected directly into glass containers provided by the analytical laboratory. The samples were placed in a sterile, labeled container, sealed with Teflon, stored in a cooler chilled to 4 degrees Celsius, pending transportation to the State of California certified analytical laboratory. Sample collection was performed in conformance with the current revision of the United States Environmental Protection Agency (USEPA), SW-846 guidance document *Test Methods for Evaluating Solid Waste*. This is the appropriate testing protocol for sand or soil sampling and analysis.

Observations made in the field were recorded on a field log and each collection location was photographed (Photographs 1-8). The field notes include a description of where the sample was collected and a description of any discoloration or odors noted in the sample.

The sand samples were field screened for volatile organic compounds (VOCs) using a photoionization detector (PID) calibrated to an isobutylene standard. A small volume of the sand sample was placed into a zip-lock baggie and allowed at least 5 minutes for VOCs to volatilize. The baggie then was opened slightly, and the PID probe tip was placed within one-eighth inch of the sand sample. PID readings were recorded on the field notes. No PID readings were measured during the sand assessment.

Sand sampling was performed under the oversight of a California Professional Geologist or Engineer.

Laboratory Analysis

Sand samples were transported, following chain-of-custody protocol, to Pace Analytical, a State-certified analytical laboratory in Bakersfield California. Analytical methods for each COC are summarized in Table 1. Pace Analytical is certified by the California Department of Health Services Lab Accreditation Program/ Environmental Laboratory Accreditation Program (ELAP) # 1186.

Photographs 1-4



Photograph 1. View of Sand Removal Area 1 between West 5th Street and Seabreeze Way, facing north.



Photograph 2. View of Sand Removal Area 2, between Seabreeze Way and Neptune Square, facing south.



Photograph 3. View of sample collection of Source Area 2, between Seabreeze Way and Neptune Square, facing east.



Photograph 4. View of Sand Removal Area 2, between Neptune Square and Oxnard Beach Park, facing west.

Photographs 5-8



Photograph 5. View of Sand Source Area 2, between Neptune Square and Oxnard Beach Park, facing east.



Photograph 6. View of sample collection of Sand Removal Area 3, between Oxnard Beach Park to Oxnard Shores, facing east.



Photograph 7. View of sample collection of Sand Removal Area 4, between Santa Cruz Avenue and Channel Islands Harbor, facing north.



Photograph 8. View of sample collection of Sand Source Area 4, between Santa Cruz Avenue and Channel Islands Harbor, facing east.

Regulatory Setting and Screening Levels

Analytical results were compared to the following risk-based screening levels:

- DTSC SLs
- SFBRWQCB ESLs
- ERL and ERM values
- Regional Background Concentrations (for Metals)

DTSC SLs: Detected concentrations were compared to DTSC SLs, if they have been provided in the Human and Ecological Risk Office (HERO) Human Health Risk Assessment (HHRA) Note 3 (DTSC 2020). If DTSC SLs have not been established, concentrations were compared to SFBRWQCB ESLs.

SFBRWQCB ESLs: Detected concentrations were also compared to SFBRWQCB Tier 1 Environmental Screening Levels (ESLs) (SFBRWQCB 2019). The ESLs have been established by the SFBRWQCB for chemicals commonly found in soil, groundwater, soil vapor, and air at sites where releases of hazardous chemicals may have occurred. ESLs are considered to be health-conservative concentration thresholds designed to be protective of the environment and human health and, even though they were prepared by SFBRWQCB staff, the ESLs are commonly applied at sites throughout California. Under most circumstances, the presence of a chemical in soil, soil vapor, groundwater, or ambient air at concentrations below the ESL corresponding to the site's exposure scenario (commercial/industrial, residential, etc.) can be assumed to not pose a significant, long term (chronic) threat to human health or the environment.

ERL/ERM Values: Results were compared to effects range low (ERL) and effects range median (ERM) values developed by Long et al. (1995) used to evaluate toxicity in marine sediment. In some instances, ERL and ERM values did not exist for certain detected COCs. The ERL and ERM values establish the range of contaminant concentrations used to evaluate potential beneficial reuse and disposal options. The ERL indicates the lowest concentration below which toxic effects are rarely observed. The ERM indicates the concentration above which effects are generally observed. These values are for screening sediments for trace metals and organic contaminants, and therefore, not all detected COCs have established ERL and ERM values. The ERL and ERM values are screening levels and are not regulatory thresholds.

Regional Background Concentrations (Metals): Because metals can be naturally occurring at elevated concentrations in the environment, metals are compared to Regional Background Concentrations when detected concentrations exceed risk-based screening levels. A commonly used reference that lists estimates of naturally occurring concentrations of metals in California soil is a Kearney Foundation of Soil Science, *Background Concentrations of Trace and Major Elements in California Soils* (Kearney 1996).

Analytical Results

Sand Sample Analytical Results

As discussed previously, analytical results for sand samples were compared to Tier 1 ESLs, DTSC residential SLs, and the ERL and ERM values. Summaries of the sand sample analytical data are included in Tables 1 and 2. A copy of the laboratory analytical report is included in Appendix A.

CCR Title 22 Metals

Metals were detected in each of the 19 sand samples analyzed (Table 2). All of the detected metals in the sand samples were reported within typical background concentrations established for California soil (Kearney Foundation 1996). With the exception of arsenic, none of the detected metals exceed any of the screening levels to which they were compared.

Arsenic

As shown in Table II, arsenic was detected in all 19 sand samples at concentrations that exceed the Tier 1 ESL and the DTSC SL which are based on the direct exposure human health risk levels for arsenic in residential soil. The detected concentrations of arsenic do not exceed the ERL or ERM values for arsenic in marine sediment, and are within naturally occurring background concentration ranges in California soil (Kearney Foundation 1996). In addition, the detected concentrations of arsenic in the Sand Source Area samples were similar concentrations as those detected in the Sand Removal Area samples.

Table II Summary of Detected Concentrations of Arsenic

Constituent	Number of Detections (Out of 19 Samples Analyzed)	Range of Detected concentrations (mg/kg)	SL, ESL, ERL, ERM (mg/kg)	Background Concentration (mg/kg)
Arsenic	19	**0.91J - 2.1**	**0.067 (ESL)** **0.11 (SL)** 8.2 (ERL) 70 (ERM)	0.6 - 11

J – Laboratory flag indicating estimated value (constituent detected at a concentration between method detection limit and reporting limit)

Total Petroleum Hydrocarbons

Total petroleum hydrocarbons were detected in three of the sand samples analyzed (Table III). TPH-g was not detected above the method detection limits during this sampling event. None of the sand samples analyzed for TPH had concentrations that exceeded their respective ESLs for TPH in soil. Table III summarizes TPH detections in the sand samples.

Table III Summary of Detected Concentrations of TPH

Constituent	Number of Detections (Out of 19 Samples Analyzed)	Samples Exceeding ESL	Maximum Detected Concentration (mg/kg)	ESL (mg/kg)
TPH-d	1	None	15 (SS13)	260 (ESL)
TPH-o	3	None	170 (SS18)	1,600 ESL

Polychlorinated Biphenyls

PCBs were not detected above the method detection limits during this sampling event (Table 2).

Polynuclear Aromatic Hydrocarbons

PNAs were not detected above the method detection limits during this sampling event (Table 2).

Organochlorine Pesticides

Table IV summarizes OCP detections in the sand samples; OCPs not listed below were not detected above the method detection limits during this sampling event (Table 2).

Table IV Summary of Detected Concentrations of OCPs

Constituent	Number of Detections (Out of 19 Samples Analyzed)	Samples Exceeding SL/ESL/ERL/ERM	Maximum Detected Concentration (mg/kg)	SL/ESL/ERL/ERM (mg/kg) Exceeded
4,4'-DDD	1	None	0.0026J (SS18)	2.7 (ESL), 1.9 (SL), 2.0 (ERL), 20 (ERM) Not Exceeded
4,4'-DDE	1	None	0.0013J (SS18)	0.33 (ESL) 2.0 (SL), 2.2 (ERL), 27 (ERM) Not Exceeded
4,4'-DDT	1	SS18	**0.0013J (SS18)**	**0.0011 (ESL)**, 1.9 (SL) 1.0 (ERL), 7.0 (ERM) Exceeds Tier 1 ESL

J – Laboratory flag indicating estimated value (constituent detected at a concentration between method detection limit and reporting limit)

The detected concentration of 4,4'-DDT in SS18 slightly exceeds the Tier 1 ESL, which is based on the protection of terrestrial habitats with significantly vegetated areas (such as parkland or single-family homes with yards). For comparison, the direct exposure human health risk level for 4,4'-DDT in residential soil is 1.9 mg/kg, and the ESL for 4,4'-DDT in terrestrial habitats with minimally vegetated areas (such as high density residential or commercial industrial areas) is 7.8 mg/kg. The detected concentration of 4,4'-DDT in SS18 does not exceed the residential ESL or SL, or the ERL or ERM values. The concentration also does not exceed the California and federal hazardous waste characterization trigger levels which are based on the Total Threshold Limit Concentration (TTLC) threshold for California hazardous waste of 1 mg/kg for 4,4-DDT. Note that during sample collection, vegetation debris and organics from the vegetation within the parking lot were observed in the area where the sample was collected.

Conclusions

This Sand Assessment scope of work has been conducted to address the specific CCC comment regarding potential COCs in the sand removal areas.

Detected metals in the sand samples are within typical background concentrations established for California soil (Kearney Foundation 1996) and do not exceed any of the screening levels to which they have been compared, except for arsenic.

Detected concentrations of arsenic are within naturally occurring background concentration ranges and do not exceed the ERL or ERM values for arsenic in marine sediment. In addition, the detected concentrations of arsenic in the Sand Source Area samples are similar to the concentrations detected in the Sand Removal Area samples. Therefore, arsenic appears to be typical of naturally occurring background concentrations and is not considered a COC.

PCBs and PNAs were not detected above the method detection limits during this sampling event.

TPH was either not detected above the method detection limits or was detected at concentrations below their respective Tier 1 ESLs for residential soil, direct exposure scenario.

The detected concentration of 4,4'-DDT in SS18 (0.0013 mg/kg) slightly exceeds the Tier 1 ESL (0.0011 mg/kg), which is based on the protection of terrestrial habitats with significantly vegetated areas (such as parkland or single-family homes with yards). The detected concentration of 4,4'-DDT in SS18 does not exceed the residential ESL or SL, or the ERL value or the ERM value. Because the detected concentration of 4,4'-DDT was only slightly above the conservative Tier 1 ESL and since the detected concentration does not exceed the ERM or ERL values for 4,4'-DDT which are used to evaluate the toxicity in marine sediment, the detected concentration of 4,4'-DDT in SS18 is not considered a COC of concern.

Recommendations

This Sand Assessment scope of work has been conducted to address the specific CCC comment regarding potential COCs in the sand removal areas. Based on the results of the Sand Assessment, the sand samples collected and analyzed during this assessment do not have COCs at concentrations that would adversely impact human health and, therefore, the wind-blown sand that has accumulated on public streets and public access points appears to be suitable for placement back on the beach.

Based on the results of the Sand Assessment, the City of Oxnard PWD's approach to relocating sand from the sand removal areas to the sand placement areas is recommended as follows: immediately after the sand has been redeposited at the sand placement areas on the beach, a tractor with a sand cleaning attachment and groom shall be used to remove any debris or trash. All debris and trash collected shall be transported to a landfill.

Limitations

This report has been prepared for and is intended for the exclusive use of the City of Oxnard. The contents of this report should not be relied upon by any other party without the written consent of Rincon.

Our conclusions regarding the site are based on observations of existing conditions at the site and the results of a limited sampling program. The results of this evaluation are qualified by the fact that only limited sampling and analytical testing was conducted during this assessment.

This scope was not intended to completely establish the quantities and distribution of contaminants present at the site. The concentrations of contaminants measured at any given location may not be representative of conditions at other locations. Furthermore, conditions may change at any particular location as a function of time in response to natural conditions, chemical reactions, and other events. Conclusions regarding the condition of the site do not represent a warranty that all areas within the site are similar to those sampled.

References

DTSC. 2020. Human and Ecological Risk Office (HERO) Human Health Risk Assessment (HHRA) Note 3, DTSC-modified Screening Levels. June. Accessible online: https://dtsc.ca.gov/wp-content/uploads/sites/31/2019/04/HHRA-Note-3-June-2020-A.pdf

Kearney Foundation. 1996. *Background Concentrations of Trace and Major Elements in California Soils.* Kearney Foundation of Soil Science, Division of Agriculture and Natural Resources, University of California. March.

Long, E.R., D.D. MacDonald, S.L. Smith, and F.D. Calder. 1995. *Incidence of Adverse Biological Effects within Ranges of Chemical Concentrations in Marine and Estuarine Sediments*. Environmental Management. Vol.19, No. 1, pp: 81-97.

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Tables

Table 1: Sand Sample Analytical Results - Metals

Sand Sample ID	Sample Date	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
		mg/kg																
SS1	3/16/2022	<0.33	**1.3**	**9.0**	**0.054 J**	**<0.052**	**3.0**	**0.59 J**	**2.0**	**1.3 J**	<0.016	<0.050	**2.3**	<0.98	<0.067	<0.64	**3.8**	**6.8**
SS2		<0.33	**1.1**	**7.6**	<0.047	**0.064 J**	**2.0**	**0.46 J**	**0.93 J**	**0.96 J**	**0.022 J**	<0.050	**2.0**	<0.98	<0.067	<0.64	**3.0**	**4.1**
SS3		<0.33	**1.2**	**10**	**0.063 J**	**0.059 J**	**3.4**	**0.88 J**	**2.7**	**1.4 J**	<0.016	<0.050	**2.5**	<0.98	<0.067	<0.64	**4.5**	**7.0**
SS4		<0.33	**1.8**	**22**	**0.083 J**	**0.056 J**	**3.7**	**0.82 J**	**1.8**	**1.6 J**	<0.016	<0.050	**3.1**	<0.98	<0.067	<0.64	**6.1**	**7.3**
SS5		<0.33	**1.5**	**17**	**0.070 J**	**0.097 J**	**3.9**	**0.72 J**	**2.5**	**1.5 J**	<0.016	<0.050	**2.5**	<0.98	<0.067	<0.64	**6.2**	**10**
SS6		<0.33	**1.6**	**19**	**0.071 J**	**0.092 J**	**3.0**	**0.77 J**	**4.9**	**1.9 J**	<0.016	<0.050	**2.8**	<0.98	<0.067	<0.64	**5.7**	**12**
SS7		<0.33	**1.8**	**26**	**0.078 J**	**0.098 J**	**4.3**	**1.0 J**	**1.7**	**1.8 J**	<0.016	<0.050	**3.6**	<0.98	<0.067	<0.64	**7.5**	**7.4**
SS8		<0.33	**1.2**	**11**	**0.060 J**	**0.063 J**	**2.7**	**0.68 J**	**1.5**	**1.3 J**	<0.016	<0.050	**2.4**	<0.98	<0.067	<0.64	**4.7**	**6.3**
SS9		<0.33	**1.4**	**8.8**	**0.047 J**	<0.052	**2.8**	**0.55 J**	**0.98 J**	**1.1 J**	<0.016	**<0.050**	**2.3**	<0.98	<0.067	<0.64	**3.7**	**4.9**
SS10		<0.33	**1.2**	**6.6**	**0.049 J**	**0.056 J**	**2.3**	**0.50 J**	**0.96 J**	**0.88 J**	<0.016	**<0.050**	**2.1**	<0.98	<0.067	<0.64	**3.6**	**5.4**
SS11		<0.33	**2.0**	**69**	**0.094 J**	**0.069 J**	**8.1**	**1.4 J**	**2.1**	**2.1 J**	<0.016	**<0.050**	**4.0**	<0.98	<0.067	<0.64	**15**	**8.6**
SS12		<0.33	**1.4**	**19**	**0.074 J**	**0.054 J**	**4.2**	**0.93 J**	**36**	**1.6 J**	<0.016	**<0.050**	**2.9**	<0.98	<0.067	<0.64	**6.8**	**15**
SS13		<0.33	**0.91 J**	**8.6**	**0.061 J**	**0.067 J**	**3.1**	**0.56 J**	**2.4**	**0.99 J**	<0.016	<0.050	**2.4**	<0.98	<0.067	<0.64	**3.5**	**5.9**
SS14		<0.33	**2.1**	**16**	**0.081 J**	**0.088 J**	**3.7**	**1.0 J**	**1.6**	**1.4 J**	<0.016	<0.050	**3.6**	<0.98	<0.067	<0.64	**5.7**	**7.5**
SS15		<0.33	**1.4**	**15**	**0.062 J**	**0.063 J**	**3.9**	**0.82 J**	**1.3**	**1.2 J**	**0.021 J**	<0.050	**2.8**	<0.98	<0.067	<0.64	**5.7**	**6.1**
SS16		<0.33	**1.2**	**24**	0.071 J	0.067 J	**3.2**	**0.83 J**	**1.6**	**1.5 J**	**0.038 J**	<0.050	**2.7**	<0.98	<0.067	<0.64	**5.9**	**7.3**
SS17		<0.33	**1.6**	**34**	**0.085 J**	**0.063 J**	**4.9**	**0.92 J**	**1.7**	**2.0 J**	<0.016	<0.050	**3.3**	<0.98	<0.067	<0.64	**8.3**	**7.3**
SS18		<0.33	**1.5**	**45**	**0.083 J**	**0.10 J**	**5.2**	**1.2 J**	**12**	**8.1**	<0.016	<0.050	**3.8**	<0.98	<0.067	<0.64	**9.4**	**30**
SS19		<0.33	**1.6**	**22**	0.066 J	<0.052	**2.7**	**0.89 J**	**1.7**	**1.4 J**	<0.016	**0.16 J**	**3.2**	<0.98	<0.067	<0.64	**5.3**	**7.4**
Tier 1 ESLs		*11*	*0.067*	*390*	*5*	*1.9*	*160*	*23*	*180*	*32*	*13*	*6.9*	*86*	*2.4*	*25*	*0.78*	*18*	*340*
DTSC Residential SLs		*NE*	*0.11*	*NE*	*16*	*71*	*NE*	*NE*	*NE*	*80*	*1*	*NE*	*820*	*NE*	*NE*	*NE*	*NE*	*NE*
ERL value		*NE*	*8.2*	*NE*	*NE*	*1.2*	*81*	*NE*	*NE*	*46.7*	*0.15*	*NE*	*20.9*	*NE*	*1*	*NE*	*NE*	*150*
ERM value		*NE*	*70*	*NE*	*NE*	*9.6*	*370*	*NE*	*NE*	*218*	*0.71*	*NE*	*51.6*	*NE*	*3.7*	*NE*	*NE*	*410*
Background Concentration		*0.15 - 1.95*	*0.6 - 11*	*133 - 1,400*	*0.25 - 2.70*	*0.05 - 1.70*	*23 - 1,579*	*2.7 - 46.9*	*9.1 - 96.4*	*12.4 - 97.1*	*0.05 - 0.90*	*0.1 - 9.6*	*9.0 - 509*	*0.015 - 0.430*	*0.10 - 8.3*	*0.17 - 1.1*	*39 - 288*	*88 - 236*

Definitions

bold - Analyte detected above method detection limit

- Concentrations detected above Tier 1 ESLs

< - not detected above the method detection limit (MDL)

mg/kg - milligrams per kilogram

NE - not established

J -Estimated value detected between the MDL and Reporting Limit

Screening Levels

DTSC SL - California Department of Toxic Substances Control (DTSC) Screening Levels (SL) , June 2020, Cancer Risk or Non-Cancer Hazard (lower value selected) for residential land use scenario

ESLs - Environmental Screening Levels, San Francisco Bay Regional Water Quality Control Board, July 2019, Revision 2. Tier 1 ESLs - ESLs for unrestricted land use at most sites

ERL- effects range low (ERL) values used to evaluate toxicity in marine sediment. Long, et al. 1995. Incidence of Adverse Biological Effects within Ranges of Chemical Concentrations in Marine and Estuarine Sediments.

ERM - effects range median (ERM) values used to evaluate toxicity in marine sediment. Long, et al. 1995. Incidence of Adverse Biological Effects within Ranges of Chemical Concentrations in Marine and Estuarine Sediments.

Background Concentration - Kearney. 1996. Background Concentrations of Trace and Major Elements in California Soils, University of California, 1996

Table 2: Soil Sample Analytical Results - TPH, OCPs, PCBs and PNAs

Sand Sample ID	Sample Date	Total Petroleum Hydrocarbons			OCPs				PCBs	PNAs
		Gasoline Range	Diesel Range	Motor Oil Range	4,4'-DDD	4,4'-DDE	4,4'-DDT	Other OCPs		
		mg/kg								
SS1	3/16/2022	<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	< various	< various
SS2		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS3		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS4		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS5		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS6		<0.20	<2.2	<7.0	<0.00064	<0.00095	<0.00040	<various	<various	<various
SS7		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS8		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS9		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS10		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS11		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS12		<0.20	<2.2	**15 J, A57**	<0.00064	<0.00095	<0.00040	<various	<various	<various
SS13		<0.20	**15 A52**	**25 A57**	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS14		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS15		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS16		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS17		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
SS18		<0.20	<2.2	**170 A57**	**0.0026 J, A10**	**0.0013 J, A10**	**0.0013 J, A10**	<various	<various	<various
SS19		<0.20	<2.2	<7.0	<0.000064	<0.000095	<0.000040	<various	<various	<various
Tier 1 ESLs		*100*	*260*	*1,600*	*2.7*	*0.33*	*0.0011*	*Various*	*Various*	*Various*
DTSC Residential SLs		*NE*	*NE*	*NE*	*1.9*	*2*	*1.9*	*Various*	*Various*	*Various*
ERL		*NE*	*NE*	*NE*	*2*	*2.2*	*1.0*	*Various*	*Various*	*Various*
ERM		*NE*	*NE*	*NE*	*20*	*27*	*7.0*	*Various*	*Various*	*Various*

Definitions

bold - Analyte detected above method detection limit

- Concentrations detected above Tier 1 ESLs

< - not detected above the method detection limit

mg/kg - milligrams per kilogram

J -Estimated value detected between the MDL and Reporting Limit

A10 - Detection and quantitation limits were raised due to matrix interference

A57 - Chromatogram not typical of motor oil

A52 - Chromatogram not typical of diesel

DDD - dichlorodiphenyldichloroethane

DDE - dichlorodiphenyldichloroethylene

DDT - dichlorodiphenyltrichloroethane

OCPs - organochlorine pesticides

PCBs - polychlorinated biphenyls

PNAs- polynuclear aromatic hydrocarbons

NE - not established

Screening Levels

ESLs - Environmental Screening Levels, San Francisco Bay Regional Water Quality Control Board, July 2019, Revision 2. Tier 1 ESLs - ESLs for unrestricted land use at most sites

DTSC SL - California Department of Toxic Substances Control (DTSC) Screening Levels (SL) , June 2020, Cancer Risk or Non-Cancer Hazard (lower value selected) for residential land use scenario

ERL- effects range low (ERL) values used to evaluate toxicity in marine sediment. Long, et al. 1995. Incidence of Adverse Biological Effects within Ranges of Chemical Concentrations in Marine and Estuarine Sediments.

ERM - effects range median (ERM) values used to evaluate toxicity in marine sediment. Long, et al. 1995. Incidence of Adverse Biological Effects within Ranges of Chemical Concentrations in Marine and Estuarine Sediments.

Appendix A

Laboratory Analytical Report

Date of Report: 03/28/2022

Scott English

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Client Project:	21-11153 Oxnard Sand Study
BCL Project:	Soil Samples
BCL Work Order:	2206102
Invoice ID:	B444782

Enclosed are the results of analyses for samples received by the laboratory on 3/16/2022. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Contact Person: Eli Velazquez
Client Service Rep

Stuart Buttram
Operations Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.
All results listed in this report are for the exclusive use of the submitting party. Pace Analytical assumes no responsibility for report alteration, separation, detachment or third party interpretation.

Table of Contents

Sample Information

Chain of Custody and Cooler Receipt form 6
Laboratory / Client Sample Cross Reference 11

Sample Results

2206102-01 - SS1

Organochlorine Pesticides (EPA Method 8081A) 14
PCB Analysis (EPA Method 8082) 15
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM) 16
Purgeable Aromatics and Total Petroleum Hydrocarbons 17
Total Petroleum Hydrocarbons 18
Total Concentrations (TTLC) 19

2206102-02 - SS2

Organochlorine Pesticides (EPA Method 8081A) 20
PCB Analysis (EPA Method 8082) 21
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM) 22
Purgeable Aromatics and Total Petroleum Hydrocarbons 23
Total Petroleum Hydrocarbons 24
Total Concentrations (TTLC) 25

2206102-03 - SS3

Organochlorine Pesticides (EPA Method 8081A) 26
PCB Analysis (EPA Method 8082) 27
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM) 28
Purgeable Aromatics and Total Petroleum Hydrocarbons 29
Total Petroleum Hydrocarbons 30
Total Concentrations (TTLC) 31

2206102-04 - SS4

Organochlorine Pesticides (EPA Method 8081A) 32
PCB Analysis (EPA Method 8082) 33
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM) 34
Purgeable Aromatics and Total Petroleum Hydrocarbons 35
Total Petroleum Hydrocarbons 36
Total Concentrations (TTLC) 37

2206102-05 - SS5

Organochlorine Pesticides (EPA Method 8081A) 38
PCB Analysis (EPA Method 8082) 39
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM) 40
Purgeable Aromatics and Total Petroleum Hydrocarbons 41
Total Petroleum Hydrocarbons 42
Total Concentrations (TTLC) 43

2206102-06 - SS6

Organochlorine Pesticides (EPA Method 8081A) 44
PCB Analysis (EPA Method 8082) 45
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM) 46
Purgeable Aromatics and Total Petroleum Hydrocarbons 47
Total Petroleum Hydrocarbons 48
Total Concentrations (TTLC) 49

2206102-07 - SS7

Organochlorine Pesticides (EPA Method 8081A) 50
PCB Analysis (EPA Method 8082) 51
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM) 52
Purgeable Aromatics and Total Petroleum Hydrocarbons 53
Total Petroleum Hydrocarbons 54
Total Concentrations (TTLC) 55

2206102-08 - SS8

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Table of Contents

Organochlorine Pesticides (EPA Method 8081A)..... 56
PCB Analysis (EPA Method 8082)..... 57
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 58
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 59
Total Petroleum Hydrocarbons..... 60
Total Concentrations (TTLC)..... 61

2206102-09 - SS9

Organochlorine Pesticides (EPA Method 8081A)..... 62
PCB Analysis (EPA Method 8082)..... 63
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 64
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 65
Total Petroleum Hydrocarbons..... 66
Total Concentrations (TTLC)..... 67

2206102-10 - SS10

Organochlorine Pesticides (EPA Method 8081A)..... 68
PCB Analysis (EPA Method 8082)..... 69
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 70
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 71
Total Petroleum Hydrocarbons..... 72
Total Concentrations (TTLC)..... 73

2206102-11 - SS11

Organochlorine Pesticides (EPA Method 8081A)..... 74
PCB Analysis (EPA Method 8082)..... 75
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 76
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 77
Total Petroleum Hydrocarbons..... 78
Total Concentrations (TTLC)..... 79

2206102-12 - SS12

Organochlorine Pesticides (EPA Method 8081A)..... 80
PCB Analysis (EPA Method 8082)..... 81
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 82
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 83
Total Petroleum Hydrocarbons..... 84
Total Concentrations (TTLC)..... 85

2206102-13 - SS13

Organochlorine Pesticides (EPA Method 8081A)..... 86
PCB Analysis (EPA Method 8082)..... 87
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 88
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 89
Total Petroleum Hydrocarbons..... 90
Total Concentrations (TTLC)..... 91

2206102-14 - SS14

Organochlorine Pesticides (EPA Method 8081A)..... 92
PCB Analysis (EPA Method 8082)..... 93
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 94
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 95
Total Petroleum Hydrocarbons..... 96
Total Concentrations (TTLC)..... 97

2206102-15 - SS15

Organochlorine Pesticides (EPA Method 8081A)..... 98
PCB Analysis (EPA Method 8082)..... 99
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 100
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 101
Total Petroleum Hydrocarbons..... 102

Table of Contents

Total Concentrations (TTLC)..... 103

2206102-16 - SS16

Organochlorine Pesticides (EPA Method 8081A)..... 104
PCB Analysis (EPA Method 8082)..... 105
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 106
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 107
Total Petroleum Hydrocarbons..... 108
Total Concentrations (TTLC)..... 109

2206102-17 - SS17

Organochlorine Pesticides (EPA Method 8081A)..... 110
PCB Analysis (EPA Method 8082)..... 111
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 112
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 113
Total Petroleum Hydrocarbons..... 114
Total Concentrations (TTLC)..... 115

2206102-18 - SS18

Organochlorine Pesticides (EPA Method 8081A)..... 116
PCB Analysis (EPA Method 8082)..... 117
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 118
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 119
Total Petroleum Hydrocarbons..... 120
Total Concentrations (TTLC)..... 121

2206102-19 - SS19

Organochlorine Pesticides (EPA Method 8081A)..... 122
PCB Analysis (EPA Method 8082)..... 123
Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)..... 124
Purgeable Aromatics and Total Petroleum Hydrocarbons..... 125
Total Petroleum Hydrocarbons..... 126
Total Concentrations (TTLC)..... 127

Quality Control Reports

Organochlorine Pesticides (EPA Method 8081A)

Method Blank Analysis..... 128
Laboratory Control Sample..... 129
Precision and Accuracy..... 130

PCB Analysis (EPA Method 8082)

Method Blank Analysis..... 131
Laboratory Control Sample..... 132
Precision and Accuracy..... 133

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

Method Blank Analysis..... 134
Laboratory Control Sample..... 135
Precision and Accuracy..... 136

Purgeable Aromatics and Total Petroleum Hydrocarbons

Method Blank Analysis..... 138
Laboratory Control Sample..... 139
Precision and Accuracy..... 140

Total Petroleum Hydrocarbons

Method Blank Analysis..... 141
Laboratory Control Sample..... 142
Precision and Accuracy..... 143

Total Concentrations (TTLC)

Method Blank Analysis..... 144
Laboratory Control Sample..... 146
Precision and Accuracy..... 148

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Table of Contents

Notes

Notes and Definitions..... 151

Pace Analytical ENVIRONMENTAL SCIENCES

Chain of Custody Form

Pace ANALYTICAL SERVICES 4100 Atlas Ct. – Bakersfield, CA 93308 – 661.327.4911 – Fax: 661.327.1918 – www.pacelabs.com

Page 1 of 2

Report To: Client: Rincon Consultants, Inc	Project #: 21-11153
Attn: Scott English	Project Name: Oxnard Sand Study
Street Address: 180 N Ashwood Ave	BID#
City, State, Zip: Ventura, CA 93003	Sampler(s) Name Printed: Marissa DeHoyos
Phone: (805) 947-4840 Fax: —	
Email: SEnglish@rinconconsultants.com	
Work Order #: 22-06102	

Analysis Requested

Comments: RUSH!

Sample #	Description	Date Sampled	Time Sampled	TPH (by 8015M) GRO/DRO	CAM 17 Metals (by 6010B/7470A)	PBCs (by 8082)	PNAs (by 8270C)	Organo-chlorine pesticides (by 8081B)	Sample Matrix: Soil	Sludge	Drinking Water	Ground Water	Waste Water	Other	Notes
-1	SS1	03/16/22	0937	X	X	X	X	X	X						includes 3 jars
-2	SS2	03/16/22	1007	X	X	X	X	X	X						
-3	SS3	03/16/22	1025	X	X	X	X	X	X						
-4	SS4	03/16/22	1010	X	X	X	X	X	X						
-5	SS5	03/16/22	1043	X	X	X	X	X	X						
-6	SS6	03/16/22	1057	X	X	X	X	X	X						
-7	SS7	03/16/22	1050	X	X	X	X	X	X						
-8	SS8	03/16/22	1110	X	X	X	X	X	X						
-9	SS9	03/16/22	1117	X	X	X	X	X	X						
-10	SS10	03/16/22	1122	X	X	X	X	X	X						
-11	SS11	03/16/22	1127	X	X	X	X	X	X						
-12	SS12	03/16/22	1148	X	X	X	X	X	X						
-13	SS13	03/16/22	1201	X	X	X	X	X	X						
-14	SS14	03/16/22	1153	X	X	X	X	X	X						

Result Request **Surcharge: ☑ STD [10 Days] ☐ 5 Day** ☐ 4 Day** ☐ 3 Day** ☐ 2 Day** ☐ 1 Day** Rush requests must be approved

CHK BY: ZC

DISTRIBUTION: SUB OUT ☐

Billing

☒ Same as above

Client: _____

Address: _____

City: _____ State _____ Zip _____

Attn: _____

P.O. #: _____

System # (Needed for CLIP)

GIS/Key ☐ Well Star ☐

EDF Required Geotracker ☐ Yes ☐ No Global ID

	Relinquished By	Date	Time	Received By	Date	Time
1.		03/16/22	1430		3/16/22	1430
2.		3/16/22	5:00		3-16-22	17:00
3.		3-16-22	1845		3/16/22	1845

Pace Analytical Bakersfield does not accept samples containing radioactive material above background levels. Samples containing radioactive material must be disclosed prior to receipt. Any samples suspected of containing radioactive material above background levels will not be accepted and will be returned to client.

REV 12/2021

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Pace Analytical ENVIRONMENTAL SCIENCES

Pace ANALYTICAL SERVICES 4100 Atlas Ct. – Bakersfield, CA 93308 – 661.327.4911 – Fax: 661.327.1918 – www.pacelabs.com

Chain of Custody Form

Page 2 of 2

Report To: Client: Rincon Consultants, Inc.	Project #: 21-11153
Attn: Scott English	Project Name: Oxnard Sand Study
Street Address: 180 N Ashwood Ave	BID#
City, State, Zip: Ventura, CA. 93003	Sampler(s) Name Printed: Marissa DeHoyos
Phone: (805)947-4840 Fax: —	
Email: SEnglish@rinconconsultants.com	
Work Order #: 22-06102	

Analysis Requested: TPH (by 8015M) GRO/DRO; CAM 17 Metals (by 6010B/7471A); PCBs (by 8082); PNAs (by 8270C); Organo-Chlorine Pesticides (by 8081A)

Comments: RUSH!

Sample Matrix: Soil, Sludge, Drinking Water, Ground Water, Waste Water, Other

Result Request **Surcharge: ☑ STD (10 Days) ☐ 5 Day** ☐ 4 Day** ☐ 3 Day** ☐ 2 Day** ☐ 1 Day** Rush requests must be approved

Sample #	Description	Date Sampled	Time Sampled	Matrix	Notes
-15	SS15	03/16/22	1217	Soil	Includes 3 jars
-16	SS16	03/16/22	1220	Soil	
-17	SS17	03/16/22	1240	Soil	
-18	SS18	03/16/22	1301	Soil	
-19	SS19	03/16/22	1308	Soil	
~~-20~~	~~SS20~~	03/16/22		Soil	

Billing
☒ Same as above
Client:
Address:
City: State Zip
Attn:
P.O. #:

System # (Needed for CLIP)
GIS/Key ☐ Well Star ☐

EDF Required Geotracker ☐ Yes ☐ No Global ID

	Relinquished By	Date	Time	Received By	Date	Time
1.		03/16/22	1430		3/16/22	1430
2.		3/16/22	1700		3/16/22	17:00
3.		3-16-22	1945		3/16/22	1945

Pace Analytical Bakersfield does not accept samples containing radioactive material above background levels. Samples containing radioactive material must be disclosed prior to receipt. Any samples suspected of containing radioactive material above background levels will not be accepted and will be returned to client.

REV 12/2021

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Chain of Custody and Cooler Receipt Form for 2206102 Page 3 of 5

BC LABORATORIES INC. COOLER RECEIPT FORM Page 1 Of 3

Submission #: 22-06102

SHIPPING INFORMATION	SHIPPING CONTAINER	FREE LIQUID
Fed Ex ☐ UPS ☐ GSO / GLS ☐ Hand Delivery ☐	Ice Chest ☑ None ☐ Box ☐	YES ☐ NO ☑
BC Lab Field Service ☑ Other ☐ (Specify)_____	Other ☐ (Specify)_____	W / S

Refrigerant: Ice ☑ Blue Ice ☐ None ☐ Other ☐ Comments:

Custody Seals: Ice Chest ☐ (Intact? Yes ☐ No ☐) Containers ☐ (Intact? Yes ☐ No ☐) None ☑ Comments:

All samples received? Yes ☑ No ☐ All samples containers intact? Yes ☑ No ☐ Description(s) match COC? Yes ☑ No ☐

COC Received ☑ YES ☐ NO

Emissivity: 0.97 Container: Clear 16oz Thermometer ID: 274

Temperature: (A) 12.4 °C / (C) 12.4 °C

Date/Time 3/16/22 1845

Analyst Init PRE

SAMPLE CONTAINERS	SAMPLE NUMBERS									
	1	2	3	4	5	6	7	8	9	10
QT PE UNPRES										
4oz / 8oz / 16oz PE UNPRES										
2oz Cr^{+6}										
QT INORGANIC CHEMICAL METALS										
INORGANIC CHEMICAL METALS 4oz / 8oz / 16oz										
PT CYANIDE										
PT NITROGEN FORMS										
PT TOTAL SULFIDE										
2oz. NITRATE / NITRITE										
PT TOTAL ORGANIC CARBON										
PT CHEMICAL OXYGEN DEMAND										
PtA PHENOLICS										
40ml VOA VIAL TRAVEL BLANK										
40ml VOA VIAL										
QT EPA 1664B										
PT ODOR										
RADIOLOGICAL										
BACTERIOLOGICAL										
40 ml VOA VIAL- 504										
QT EPA 505/608.3/8081A										
QT EPA 515.1/8151A										
QT EPA 525.2										
QT EPA 525.2 TRAVEL BLANK										
40ml EPA 547										
40ml EPA 531.1										
8oz EPA 548.1										
QT EPA 549.2										
QT EPA 8015M										
QT EPA 8270C										
8oz / 16oz / 32oz AMBER										
8oz / 16oz / 32oz JAR	A-C	A-C	A-C	A-C	A-C	A-C	A-C	A-C	A-C	A-C
SOIL SLEEVE										
PCB VIAL										
PLASTIC BAG										
TEDLAR BAG										
FERROUS IRON										
ENCORE										
SMART KIT										
SUMMA CANISTER										

Comments:

Sample Numbering Completed By: PRE Date/Time: 3/17/22 1955

A = Actual / C = Corrected

Rev 22 04/13/21

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Chain of Custody and Cooler Receipt Form for 2206102 Page 4 of 5

BC LABORATORIES INC. COOLER RECEIPT FORM Page 2 Of 3

Submission #: 22-06102

SHIPPING INFORMATION	SHIPPING CONTAINER	FREE LIQUID
Fed Ex ☐ UPS ☐ GSO / GLS ☐ Hand Delivery ☐	Ice Chest ☑ None ☐ Box ☐	YES ☐ NO ☑
BC Lab Field Service ☑ Other ☐ (Specify)_____	Other ☐ (Specify)_____	W / S

Refrigerant: Ice ☑ Blue Ice ☐ None ☐ Other ☐ Comments:

Custody Seals: Ice Chest ☐ (Intact? Yes ☐ No ☐) Containers ☐ (Intact? Yes ☐ No ☐) None ☑ Comments:

All samples received? Yes ☑ No ☐ All samples containers intact? Yes ☑ No ☐ Description(s) match COC? Yes ☑ No ☐

COC Received ☑ YES ☐ NO

Emissivity: 0.97 Container: Clev GLASS Thermometer ID: 274

Temperature: (A) 12.4 °C / (C) 12.4 °C

Date/Time 3/16/22 1845

Analyst Init PRE

SAMPLE CONTAINERS	SAMPLE NUMBERS									
	1	2	3	4	5	6	7	8	9	10
QT PE UNPRES										
40z / 80z / 16oz PE UNPRES										
2oz Cr^{+6}										
QT INORGANIC CHEMICAL METALS										
INORGANIC CHEMICAL METALS 4oz / 8oz / 16oz										
PT CYANIDE										
PT NITROGEN FORMS										
PT TOTAL SULFIDE										
2oz. NITRATE / NITRITE										
PT TOTAL ORGANIC CARBON										
PT CHEMICAL OXYGEN DEMAND										
PtA PHENOLICS										
40ml VOA VIAL TRAVEL BLANK										
40ml VOA VIAL										
QT EPA 1664B										
PT ODOR										
RADIOLOGICAL										
BACTERIOLOGICAL										
40 ml VOA VIAL- 504										
QT EPA 508/608.3/8081A										
QT EPA 515.1/8151A										
QT EPA 525.2										
QT EPA 525.2 TRAVEL BLANK										
40ml EPA 547										
40ml EPA 531.1										
8oz EPA 548.1										
QT EPA 549.2										
QT EPA 8015M										
QT EPA 8270C										
8oz / 16oz / 32oz AMBER										
8oz / 16oz / 32oz JAR	A-C	A-C								
SOIL SLEEVE										
PCB VIAL										
PLASTIC BAG										
TEDLAR BAG										
FERROUS IRON										
ENCORE										
SMART KIT										
SUMMA CANISTER										

Comments:

Sample Numbering Completed By: PRE Date/Time: 3/17/22 1955

A = Actual / C = Corrected

Rev 22 04/13/21

Chain of Custody and Cooler Receipt Form for 2206102 Page 5 of 5

BC LABORATORIES INC. COOLER RECEIPT FORM Page 3 of 3

Submission #: 22-06102

SHIPPING INFORMATION	SHIPPING CONTAINER	FREE LIQUID
Fed Ex ☐ UPS ☐ GSO / GLS ☐ Hand Delivery ☐	Ice Chest ☑ None ☐ Box ☐	YES ☐ NO ☑
BC Lab Field Service ☑ Other ☐ (Specify)_____	Other ☐ (Specify)_____	W / S

Refrigerant: Ice ☑ Blue Ice ☐ None ☐ Other ☐ Comments:

Custody Seals: Ice Chest ☐ Intact? Yes ☐ No ☐ Containers ☐ Intact? Yes ☐ No ☐ None ☑ Comments:

All samples received? Yes ☑ No ☐ All samples containers intact? Yes ☑ No ☐ Description(s) match COC? Yes ☑ No ☐

COC Received ☑ YES ☐ NO

Emissivity: 0.97 Container: Clear Glass Thermometer ID: 274

Temperature: (A) 12.3 °C / (C) 12.3 °C

Date/Time 3/16/22 1845

Analyst Init PRC

SAMPLE CONTAINERS	SAMPLE NUMBERS									
	1	2	3	4	5	6	7	8	9	10
QT PE UNPRES										
4oz / 8oz / 16oz PE UNPRES										
2oz Cr+6										
QT INORGANIC CHEMICAL METALS										
INORGANIC CHEMICAL METALS 4oz / 8oz / 16oz										
PT CYANIDE										
PT NITROGEN FORMS										
PT TOTAL SULFIDE										
2oz NITRATE / NITRITE										
PT TOTAL ORGANIC CARBON										
PT CHEMICAL OXYGEN DEMAND										
PtA PHENOLICS										
40ml VOA VIAL TRAVEL BLANK										
40ml VOA VIAL										
QT EPA 1664B										
PT ODOR										
RADIOLOGICAL										
BACTERIOLOGICAL										
40 ml VOA VIAL- 504										
QT EPA 508/608.3/8081A										
QT EPA 515.1/8151A										
QT EPA 525.2										
QT EPA 525.2 TRAVEL BLANK										
40ml EPA 547										
40ml EPA 531.1										
8oz EPA 548.1										
QT EPA 549.2										
QT EPA 8015M										
QT EPA 8270C										
8oz / 16oz / 32oz AMBER										
8oz / 16oz / 32oz JAR			A-C	A-C	A-C	A-C	A-C	A-C	A-C	
SOIL SLEEVE										
PCB VIAL										
PLASTIC BAG										
TEDLAR BAG										
FERROUS IRON										
ENCORE										
SMART KIT										
SUMMA CANISTER										

Comments:

Sample Numbering Completed By: PRC Date/Time: 3/17/22 1955

A = Actual / C = Corrected

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Pace Analytical
ENVIRONMENTAL SCIENCES

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Laboratory / Client Sample Cross Reference

Laboratory	Client Sample Information			
2206102-01	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 09:37
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS1	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-02	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 10:07
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS2	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-03	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 10:25
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS3	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-04	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 10:10
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS4	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-05	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 10:43
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS5	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-06	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 10:57
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS6	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-07	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 10:50
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS7	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Laboratory / Client Sample Cross Reference

Laboratory	Client Sample Information			
2206102-08	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 11:10
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS8	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-09	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 11:17
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS9	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-10	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 11:22
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS10	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-11	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 11:27
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS11	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-12	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 11:48
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS12	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-13	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 12:01
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS13	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-14	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 11:53
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS14	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil

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Pace Analytical
ENVIRONMENTAL SCIENCES

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Laboratory / Client Sample Cross Reference

Laboratory	Client Sample Information			
2206102-15	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 12:17
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS15	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-16	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 12:20
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS16	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-17	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 12:40
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS17	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-18	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 13:01
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS18	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil
2206102-19	**COC Number:**	---	**Receive Date:**	03/16/2022 18:45
	Project Number:	---	**Sampling Date:**	03/16/2022 13:08
	Sampling Location:	---	**Sample Depth:**	---
	Sampling Point:	SS19	**Lab Matrix:**	Solids
	Sampled By:	---	**Sample Type:**	Soil

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Pace Analytical
ENVIRONMENTAL SCIENCES

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-01 | **Client Sample Name:** SS1, 3/16/2022 9:37:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	92.7	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	101	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 15:13	RSM	GC-17	1.003	B135108	EPA 3550B

DCN = Data Continuation Number

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-01 | **Client Sample Name:** SS1, 3/16/2022 9:37:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	125	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 10:00	RSM	GC-14	0.997	B135204	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-01 | **Client Sample Name:** SS1, 3/16/2022 9:37:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	68.3	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	62.6	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	84.2	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 12:32	OLH	MS-B4	0.987	B135191	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-01 | **Client Sample Name:** SS1, 3/16/2022 9:37:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	80.0	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 18:44	HP1	GC-V8	1.004	B134548	EPA 5030 Soil GC

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-01 | **Client Sample Name:** SS1, 3/16/2022 9:37:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	101	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/22/22 23:58	BUP	GC-2	1.014	B135145	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-01 | **Client Sample Name:** SS1, 3/16/2022 9:37:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.3**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**9.0**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.054**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	ND	mg/kg	0.50	0.052	EPA-6010B	100		1
Chromium	**3.0**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.59**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**2.0**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.3**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.3**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**3.8**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**6.8**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:20	AK1	PE-OP4	1	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:20	TMT	CETAC3	1.025	B135015	EPA 7471A

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-02 | **Client Sample Name:** SS2, 3/16/2022 10:07:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	94.4	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	97.1	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 15:29	RSM	GC-17	0.993	B135108	EPA 3550B

DCN = Data Continuation Number

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-02 | **Client Sample Name:** SS2, 3/16/2022 10:07:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	125	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 10:11	RSM	GC-14	0.990	B135204	EPA 3550B

DCN = Data Continuation Number

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-02 | **Client Sample Name:** SS2, 3/16/2022 10:07:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	102	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	86.3	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	105	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 12:55	OLH	MS-B4	0.957	B135191	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-02 | **Client Sample Name:** SS2, 3/16/2022 10:07:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	85.0	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 19:08	HP1	GC-V8	0.992	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-02 | **Client Sample Name:** SS2, 3/16/2022 10:07:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	105	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 00:21	BUP	GC-2	1.017	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-02 | **Client Sample Name:** SS2, 3/16/2022 10:07:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.1**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**7.6**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	ND	mg/kg	0.50	0.047	EPA-6010B	75		1
Cadmium	**0.064**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**2.0**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.46**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**0.93**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500	**J**	1
Lead	**0.96**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	**0.022**	**mg/kg**	**0.16**	**0.016**	**EPA-7471A**	20	**J**	2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.0**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**3.0**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**4.1**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:37	AK1	PE-OP4	0.962	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:22	TMT	CETAC3	0.992	B135015	EPA 7471A

DCN = Data Continuation Number

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ENVIRONMENTAL SCIENCES

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-03 | **Client Sample Name:** SS3, 3/16/2022 10:25:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	94.8	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	101	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 15:46	RSM	GC-17	1.014	B135108	EPA 3550B

DCN = Data Continuation Number

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-03 | **Client Sample Name:** SS3, 3/16/2022 10:25:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.050	0.012	EPA-8082	50	A10	1
PCB-1221	ND	mg/kg	0.050	0.016	EPA-8082	50	A10	1
PCB-1232	ND	mg/kg	0.050	0.013	EPA-8082	50	A10	1
PCB-1242	ND	mg/kg	0.050	0.0075	EPA-8082	50	A10	1
PCB-1248	ND	mg/kg	0.050	0.010	EPA-8082	50	A10	1
PCB-1254	ND	mg/kg	0.050	0.0080	EPA-8082	50	A10	1
PCB-1260	ND	mg/kg	0.050	0.0090	EPA-8082	50	A10	1
Total PCB's (Summation)	ND	mg/kg	0.050	0.025	EPA-8082	50	A10	1
Decachlorobiphenyl (Surrogate)	158	%	40 - 120 (LCL - UCL)		EPA-8082		A10,S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 10:23	RSM	GC-14	4.950	B135204	EPA 3550B

DCN = Data Continuation Number

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-03 | **Client Sample Name:** SS3, 3/16/2022 10:25:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	102	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	85.1	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	104	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 13:19	OLH	MS-B4	0.983	B135191	EPA 3550B

DCN = Data Continuation Number

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-03 | **Client Sample Name:** SS3, 3/16/2022 10:25:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	82.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 19:33	HP1	GC-V8	0.984	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-03 | **Client Sample Name:** SS3, 3/16/2022 10:25:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	77.5	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 00:44	BUP	GC-2	1.014	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-03 | **Client Sample Name:** SS3, 3/16/2022 10:25:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.2**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**10**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.063**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.059**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**3.4**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.88**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**2.7**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.4**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.5**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**4.5**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**7.0**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:40	AK1	PE-OP4	0.952	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:24	TMT	CETAC3	0.962	B135015	EPA 7471A

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-04 | **Client Sample Name:** SS4, 3/16/2022 10:10:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	112	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	116	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 16:02	RSM	GC-17	0.997	B135108	EPA 3550B

DCN = Data Continuation Number

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-04 | **Client Sample Name:** SS4, 3/16/2022 10:10:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	127	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 10:34	RSM	GC-14	0.990	B135204	EPA 3550B

DCN = Data Continuation Number

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-04 | **Client Sample Name:** SS4, 3/16/2022 10:10:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	115	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	94.5	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	116	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 13:42	OLH	MS-B4	1.007	B135191	EPA 3550B

DCN = Data Continuation Number

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-04 | **Client Sample Name:** SS4, 3/16/2022 10:10:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	82.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 19:57	HP1	GC-V8	0.984	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-04 | **Client Sample Name:** SS4, 3/16/2022 10:10:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	101	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 01:06	BUP	GC-2	1.010	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-04 | **Client Sample Name:** SS4, 3/16/2022 10:10:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.8**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**22**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.083**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.056**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**3.7**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.82**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**1.8**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.6**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**3.1**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**6.1**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**7.3**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:41	AK1	PE-OP4	0.980	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:27	TMT	CETAC3	1.025	B135015	EPA 7471A

DCN = Data Continuation Number

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180 North Ashwood Avenue
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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-05 | **Client Sample Name:** SS5, 3/16/2022 10:43:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	105	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	112	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 11:31	RSM	GC-17	1.017	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-05 | **Client Sample Name:** SS5, 3/16/2022 10:43:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.10	0.023	EPA-8082	50	A10	1
PCB-1221	ND	mg/kg	0.10	0.033	EPA-8082	50	A10	1
PCB-1232	ND	mg/kg	0.10	0.026	EPA-8082	50	A10	1
PCB-1242	ND	mg/kg	0.10	0.015	EPA-8082	50	A10	1
PCB-1248	ND	mg/kg	0.10	0.021	EPA-8082	50	A10	1
PCB-1254	ND	mg/kg	0.10	0.016	EPA-8082	50	A10	1
PCB-1260	ND	mg/kg	0.10	0.018	EPA-8082	50	A10	1
Total PCB's (Summation)	ND	mg/kg	0.10	0.050	EPA-8082	50	A10	1
Decachlorobiphenyl (Surrogate)	133	%	40 - 120 (LCL - UCL)		EPA-8082		A10,S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 10:46	RSM	GC-14	9.868	B135204	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-05 | **Client Sample Name:** SS5, 3/16/2022 10:43:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	67.6	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	60.0	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	76.7	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 14:06	OLH	MS-B4	0.977	B135191	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-05 | **Client Sample Name:** SS5, 3/16/2022 10:43:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	77.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 20:21	HP1	GC-V8	1.010	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-05 | **Client Sample Name:** SS5, 3/16/2022 10:43:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	83.0	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 01:29	BUP	GC-2	1.017	B135145	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-05 | **Client Sample Name:** SS5, 3/16/2022 10:43:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.5**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**17**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.070**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.097**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**3.9**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.72**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**2.5**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.5**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.5**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**6.2**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**10**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:43	AK1	PE-OP4	0.943	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:29	TMT	CETAC3	1.025	B135015	EPA 7471A

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-06 | **Client Sample Name:** SS6, 3/16/2022 10:57:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.0050	0.00018	EPA-8081A	1.4	A10	1
alpha-BHC	ND	mg/kg	0.0050	0.00038	EPA-8081A		A10	1
beta-BHC	ND	mg/kg	0.0050	0.00048	EPA-8081A		A10	1
delta-BHC	ND	mg/kg	0.0050	0.00037	EPA-8081A		A10	1
gamma-BHC (Lindane)	ND	mg/kg	0.0050	0.00018	EPA-8081A	4.0	A10	1
Chlordane (Technical)	ND	mg/kg	0.50	0.010	EPA-8081A	2.5	A10	1
4,4'-DDD	ND	mg/kg	0.0050	0.00064	EPA-8081A	1.0	A10	1
4,4'-DDE	ND	mg/kg	0.0050	0.00095	EPA-8081A	1.0	A10	1
4,4'-DDT	ND	mg/kg	0.0050	0.00040	EPA-8081A	1.0	A10	1
Dieldrin	ND	mg/kg	0.0050	0.00036	EPA-8081A	8.0	A10	1
Endosulfan I	ND	mg/kg	0.0050	0.00020	EPA-8081A		A10	1
Endosulfan II	ND	mg/kg	0.0050	0.00034	EPA-8081A		A10	1
Endosulfan sulfate	ND	mg/kg	0.0050	0.00026	EPA-8081A		A10	1
Endrin	ND	mg/kg	0.0050	0.00065	EPA-8081A	0.2	A10	1
Endrin aldehyde	ND	mg/kg	0.0050	0.00018	EPA-8081A		A10	1
Heptachlor	ND	mg/kg	0.0050	0.00086	EPA-8081A	4.7	A10	1
Heptachlor epoxide	ND	mg/kg	0.0050	0.00017	EPA-8081A		A10	1
Methoxychlor	ND	mg/kg	0.0050	0.00094	EPA-8081A	100	A10	1
Toxaphene	ND	mg/kg	0.50	0.014	EPA-8081A	5	A10	1
TCMX (Surrogate)	141	%	20 - 130 (LCL - UCL)		EPA-8081A		A10,S09	1
Decachlorobiphenyl (Surrogate)	147	%	40 - 130 (LCL - UCL)		EPA-8081A		A10,S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 12:38	RSM	GC-17	9.967	B135108	EPA 3550B

DCN = Data Continuation Number

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-06 | **Client Sample Name:** SS6, 3/16/2022 10:57:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	140	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 15:11	RSM	GC-14	1.010	B135204	EPA 3550B

DCN = Data Continuation Number

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-06 | **Client Sample Name:** SS6, 3/16/2022 10:57:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	76.9	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	67.9	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	83.2	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 14:30	OLH	MS-B4	0.967	B135191	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-06 | **Client Sample Name:** SS6, 3/16/2022 10:57:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	82.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 21:59	HP1	GC-V8	1.008	B134548	EPA 5030 Soil GC

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-06 | **Client Sample Name:** SS6, 3/16/2022 10:57:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	78.3	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 01:52	BUP	GC-2	1.017	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-06 | **Client Sample Name:** SS6, 3/16/2022 10:57:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.6**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**19**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.071**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.092**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**3.0**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.77**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**4.9**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.9**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.8**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**5.7**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**12**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:48	AK1	PE-OP4	0.990	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:31	TMT	CETAC3	0.992	B135015	EPA 7471A

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-07 | **Client Sample Name:** SS7, 3/16/2022 10:50:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	106	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	127	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 16:19	RSM	GC-17	0.997	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-07 | **Client Sample Name:** SS7, 3/16/2022 10:50:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	147	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 11:34	RSM	GC-14	0.990	B135204	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-07 | **Client Sample Name:** SS7, 3/16/2022 10:50:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	98.1	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	83.6	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	103	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 14:53	OLH	MS-B4	0.963	B135191	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-07 | **Client Sample Name:** SS7, 3/16/2022 10:50:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	77.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 22:23	HP1	GC-V8	1.008	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-07 | **Client Sample Name:** SS7, 3/16/2022 10:50:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	98.5	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 03:22	BUP	GC-2	1.014	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-07 | **Client Sample Name:** SS7, 3/16/2022 10:50:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.8**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**26**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.078**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.098**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**4.3**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**1.0**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**1.7**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.8**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**3.6**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**7.5**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**7.4**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:50	AK1	PE-OP4	0.926	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:33	TMT	CETAC3	1.008	B135015	EPA 7471A

DCN = Data Continuation Number

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-08 | **Client Sample Name:** SS8, 3/16/2022 11:10:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	110	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	124	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 16:36	RSM	GC-17	1.017	B135108	EPA 3550B

DCN = Data Continuation Number

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-08 | **Client Sample Name:** SS8, 3/16/2022 11:10:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	153	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 11:46	RSM	GC-14	1.017	B135204	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-08 | **Client Sample Name:** SS8, 3/16/2022 11:10:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	86.5	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	72.8	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	93.3	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 15:17	OLH	MS-B4	0.993	B135191	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-08 | **Client Sample Name:** SS8, 3/16/2022 11:10:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	80.0	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 22:48	HP1	GC-V8	1.014	B134548	EPA 5030 Soil GC

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-08 | **Client Sample Name:** SS8, 3/16/2022 11:10:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	102	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 03:45	BUP	GC-2	1.010	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-08 | **Client Sample Name:** SS8, 3/16/2022 11:10:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.2**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**11**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.060**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.063**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**2.7**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.68**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**1.5**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.3**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.4**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**4.7**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**6.3**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:52	AK1	PE-OP4	0.909	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:39	TMT	CETAC3	0.962	B135015	EPA 7471A

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-09 | **Client Sample Name:** SS9, 3/16/2022 11:17:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	103	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	114	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 16:52	RSM	GC-17	0.997	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-09 | **Client Sample Name:** SS9, 3/16/2022 11:17:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	168	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 11:58	RSM	GC-14	1.007	B135204	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-09 | **Client Sample Name:** SS9, 3/16/2022 11:17:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	97.0	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	84.8	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	104	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 15:41	OLH	MS-B4	0.984	B135191	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-09 | **Client Sample Name:** SS9, 3/16/2022 11:17:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	80.0	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/18/22 23:12	HP1	GC-V8	1	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-09 | **Client Sample Name:** SS9, 3/16/2022 11:17:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	83.5	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 04:08	BUP	GC-2	1.017	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-09 | **Client Sample Name:** SS9, 3/16/2022 11:17:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.4**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**8.8**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.047**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	ND	mg/kg	0.50	0.052	EPA-6010B	100		1
Chromium	**2.8**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.55**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**0.98**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500	**J**	1
Lead	**1.1**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.3**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**3.7**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**4.9**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:53	AK1	PE-OP4	0.926	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:41	TMT	CETAC3	1.025	B135015	EPA 7471A

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ENVIRONMENTAL SCIENCES

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-10 | **Client Sample Name:** SS10, 3/16/2022 11:22:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	113	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	111	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 17:58	RSM	GC-17	1.010	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-10 | **Client Sample Name:** SS10, 3/16/2022 11:22:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	157	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 12:10	RSM	GC-14	0.997	B135204	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-10 | **Client Sample Name:** SS10, 3/16/2022 11:22:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	97.3	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	84.3	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	107	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 16:05	OLH	MS-B4	1.010	B135191	EPA 3550B

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-10 | **Client Sample Name:** SS10, 3/16/2022 11:22:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	80.0	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/21/22 12:57	HP1	GC-V8	0.988	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-10 | **Client Sample Name:** SS10, 3/16/2022 11:22:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	90.0	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 04:30	BUP	GC-2	1.017	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-10 | **Client Sample Name:** SS10, 3/16/2022 11:22:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.2**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**6.6**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.049**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.056**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**2.3**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.50**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**0.96**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500	**J**	1
Lead	**0.88**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.1**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**3.6**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**5.4**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 23:55	AK1	PE-OP4	0.909	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:44	TMT	CETAC3	1.008	B135015	EPA 7471A

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-11 | **Client Sample Name:** SS11, 3/16/2022 11:27:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	109	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	125	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 18:15	RSM	GC-17	1.017	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-11 | **Client Sample Name:** SS11, 3/16/2022 11:27:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	155	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 12:22	RSM	GC-14	1.003	B135204	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-11 | **Client Sample Name:** SS11, 3/16/2022 11:27:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	110	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	93.8	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	118	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 16:29	OLH	MS-B4	0.983	B135191	EPA 3550B

DCN = Data Continuation Number

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-11 | **Client Sample Name:** SS11, 3/16/2022 11:27:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	77.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/19/22 00:01	HP1	GC-V8	0.994	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-11 | **Client Sample Name:** SS11, 3/16/2022 11:27:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	97.1	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 04:53	BUP	GC-2	0.984	B135145	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-11 | **Client Sample Name:** SS11, 3/16/2022 11:27:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**2.0**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**69**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.094**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.069**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**8.1**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**1.4**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**2.1**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**2.1**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**4.0**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**15**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**8.6**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/22/22 00:19	AK1	PE-OP4	0.935	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:46	TMT	CETAC3	0.992	B135015	EPA 7471A

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-12 | **Client Sample Name:** SS12, 3/16/2022 11:48:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.0050	0.00018	EPA-8081A	1.4	A10	1
alpha-BHC	ND	mg/kg	0.0050	0.00038	EPA-8081A		A10	1
beta-BHC	ND	mg/kg	0.0050	0.00048	EPA-8081A		A10	1
delta-BHC	ND	mg/kg	0.0050	0.00037	EPA-8081A		A10	1
gamma-BHC (Lindane)	ND	mg/kg	0.0050	0.00018	EPA-8081A	4.0	A10	1
Chlordane (Technical)	ND	mg/kg	0.50	0.010	EPA-8081A	2.5	A10	1
4,4'-DDD	ND	mg/kg	0.0050	0.00064	EPA-8081A	1.0	A10	1
4,4'-DDE	ND	mg/kg	0.0050	0.00095	EPA-8081A	1.0	A10	1
4,4'-DDT	ND	mg/kg	0.0050	0.00040	EPA-8081A	1.0	A10	1
Dieldrin	ND	mg/kg	0.0050	0.00036	EPA-8081A	8.0	A10	1
Endosulfan I	ND	mg/kg	0.0050	0.00020	EPA-8081A		A10	1
Endosulfan II	ND	mg/kg	0.0050	0.00034	EPA-8081A		A10	1
Endosulfan sulfate	ND	mg/kg	0.0050	0.00026	EPA-8081A		A10	1
Endrin	ND	mg/kg	0.0050	0.00065	EPA-8081A	0.2	A10	1
Endrin aldehyde	ND	mg/kg	0.0050	0.00018	EPA-8081A		A10	1
Heptachlor	ND	mg/kg	0.0050	0.00086	EPA-8081A	4.7	A10	1
Heptachlor epoxide	ND	mg/kg	0.0050	0.00017	EPA-8081A		A10	1
Methoxychlor	ND	mg/kg	0.0050	0.00094	EPA-8081A	100	A10	1
Toxaphene	ND	mg/kg	0.50	0.014	EPA-8081A	5	A10	1
TCMX (Surrogate)	81.0	%	20 - 130 (LCL - UCL)		EPA-8081A		A10	1
Decachlorobiphenyl (Surrogate)	83.5	%	40 - 130 (LCL - UCL)		EPA-8081A		A10	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 12:54	RSM	GC-17	9.967	B135108	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-12 | **Client Sample Name:** SS12, 3/16/2022 11:48:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	128	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 12:35	RSM	GC-14	0.997	B135204	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-12 | **Client Sample Name:** SS12, 3/16/2022 11:48:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	78.8	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	71.5	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	86.2	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 16:53	OLH	MS-B4	0.963	B135191	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-12 | **Client Sample Name:** SS12, 3/16/2022 11:48:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	75.0	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/19/22 00:26	HP1	GC-V8	1.010	B134548	EPA 5030 Soil GC

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-12 | **Client Sample Name:** SS12, 3/16/2022 11:48:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	**15**	**mg/kg**	**20**	**7.0**	**EPA-8015B/FFP**	ND	**J,A57**	1
Tetracosane (Surrogate)	94.6	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 12:51	BUP	GC-2	0.993	B135145	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-12 | **Client Sample Name:** SS12, 3/16/2022 11:48:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.4**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**19**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.074**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.054**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**4.2**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.93**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**36**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.6**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.9**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**6.8**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**15**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/22/22 00:22	AK1	PE-OP4	0.980	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:48	TMT	CETAC3	1.008	B135015	EPA 7471A

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-13 | **Client Sample Name:** SS13, 3/16/2022 12:01:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	81.1	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	84.6	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 18:32	RSM	GC-17	1.003	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-13 | **Client Sample Name:** SS13, 3/16/2022 12:01:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	125	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 12:48	RSM	GC-14	1.017	B135204	EPA 3550B

DCN = Data Continuation Number

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ENVIRONMENTAL SCIENCES

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-13 | **Client Sample Name:** SS13, 3/16/2022 12:01:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	77.2	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	68.4	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	88.1	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 17:17	OLH	MS-B4	0.947	B135191	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-13 | **Client Sample Name:** SS13, 3/16/2022 12:01:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	77.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/19/22 00:50	HP1	GC-V8	1.018	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-13 | **Client Sample Name:** SS13, 3/16/2022 12:01:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	**15**	**mg/kg**	**10**	**2.2**	**EPA-8015B/FFP**	ND	**A52**	1
TPH - Hydraulic Oil / Motor Oil	**25**	**mg/kg**	**20**	**7.0**	**EPA-8015B/FFP**	ND	**A57**	1
Tetracosane (Surrogate)	102	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 05:16	BUP	GC-2	1.003	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-13 | **Client Sample Name:** SS13, 3/16/2022 12:01:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**0.91**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500	**J**	1
Barium	**8.6**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.061**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.067**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**3.1**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.56**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**2.4**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**0.99**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.4**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**3.5**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**5.9**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/22/22 00:24	AK1	PE-OP4	0.926	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:50	TMT	CETAC3	0.977	B135015	EPA 7471A

DCN = Data Continuation Number

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-14 | **Client Sample Name:** SS14, 3/16/2022 11:53:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	117	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	133	%	40 - 130 (LCL - UCL)		EPA-8081A		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 18:48	RSM	GC-17	1.007	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-14 | **Client Sample Name:** SS14, 3/16/2022 11:53:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	123	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 13:01	RSM	GC-14	0.987	B135204	EPA 3550B

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-14 | **Client Sample Name:** SS14, 3/16/2022 11:53:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	112	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	90.3	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	108	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 17:40	OLH	MS-B4	0.990	B135191	EPA 3550B

DCN = Data Continuation Number

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-14 | **Client Sample Name:** SS14, 3/16/2022 11:53:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	77.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/19/22 01:15	HP1	GC-V8	0.994	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-14 | **Client Sample Name:** SS14, 3/16/2022 11:53:00AM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	101	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 05:38	BUP	GC-2	0.997	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-14 | **Client Sample Name:** SS14, 3/16/2022 11:53:00AM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**2.1**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**16**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.081**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.088**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**3.7**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**1.0**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**1.6**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.4**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**3.6**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**5.7**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**7.5**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/22/22 00:26	AK1	PE-OP4	0.971	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:10	03/22/22 12:52	TMT	CETAC3	0.977	B135015	EPA 7471A

DCN = Data Continuation Number

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-15 | **Client Sample Name:** SS15, 3/16/2022 12:17:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	102	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	103	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 19:05	RSM	GC-17	0.997	B135108	EPA 3550B

DCN = Data Continuation Number

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-15 | **Client Sample Name:** SS15, 3/16/2022 12:17:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	150	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 13:14	RSM	GC-14	1.010	B135204	EPA 3550B

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-15 | **Client Sample Name:** SS15, 3/16/2022 12:17:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	98.9	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	86.4	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	105	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 18:04	OLH	MS-B4	0.950	B135191	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-15 | **Client Sample Name:** SS15, 3/16/2022 12:17:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	75.0	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/19/22 01:40	HP1	GC-V8	1.018	B134548	EPA 5030 Soil GC

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-15 | **Client Sample Name:** SS15, 3/16/2022 12:17:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	110	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 06:01	BUP	GC-2	1.014	B135145	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-15 | **Client Sample Name:** SS15, 3/16/2022 12:17:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.4**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**15**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.062**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.063**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**3.9**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.82**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**1.3**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.2**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	**0.021**	**mg/kg**	**0.16**	**0.016**	**EPA-7471A**	20	**J**	2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.8**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**5.7**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**6.1**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/22/22 00:27	AK1	PE-OP4	0.990	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:15	03/22/22 13:04	TMT	CETAC3	1.008	B135016	EPA 7471A

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-16 | **Client Sample Name:** SS16, 3/16/2022 12:20:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	91.3	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	96.7	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 19:21	RSM	GC-17	1.003	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-16 | **Client Sample Name:** SS16, 3/16/2022 12:20:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	125	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 13:25	RSM	GC-14	1.014	B135204	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-16 | **Client Sample Name:** SS16, 3/16/2022 12:20:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	83.2	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	74.2	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	90.2	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 18:28	OLH	MS-B4	0.957	B135191	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-16 | **Client Sample Name:** SS16, 3/16/2022 12:20:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	77.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/19/22 03:18	HP1	GC-V8	1.010	B134548	EPA 5030 Soil GC

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-16 | **Client Sample Name:** SS16, 3/16/2022 12:20:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	101	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 06:24	BUP	GC-2	1.017	B135145	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-16 | **Client Sample Name:** SS16, 3/16/2022 12:20:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.2**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**24**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.071**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.067**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**3.2**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.83**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**1.6**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.5**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	**0.038**	**mg/kg**	**0.16**	**0.016**	**EPA-7471A**	20	**J**	2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**2.7**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**5.9**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**7.3**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/22/22 00:29	AK1	PE-OP4	0.971	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:15	03/22/22 13:18	TMT	CETAC3	1.025	B135016	EPA 7471A

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ENVIRONMENTAL SCIENCES

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-17 | **Client Sample Name:** SS17, 3/16/2022 12:40:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	87.4	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	90.9	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 19:38	RSM	GC-17	0.997	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-17 | **Client Sample Name:** SS17, 3/16/2022 12:40:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	138	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 14:33	RSM	GC-14	0.990	B135204	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-17 | **Client Sample Name:** SS17, 3/16/2022 12:40:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	88.6	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	78.7	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	95.3	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 18:52	OLH	MS-B4	0.983	B135191	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-17 | **Client Sample Name:** SS17, 3/16/2022 12:40:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	77.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/19/22 03:43	HP1	GC-V8	1.002	B134548	EPA 5030 Soil GC

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-17 | **Client Sample Name:** SS17, 3/16/2022 12:40:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	107	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 06:46	BUP	GC-2	1.017	B135145	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-17 | **Client Sample Name:** SS17, 3/16/2022 12:40:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.6**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**34**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.085**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.063**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**4.9**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**0.92**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**1.7**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**2.0**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**3.3**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**8.3**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**7.3**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/22/22 00:31	AK1	PE-OP4	0.943	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:15	03/22/22 13:20	TMT	CETAC3	0.962	B135016	EPA 7471A

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-18 | **Client Sample Name:** SS18, 3/16/2022 1:01:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.0050	0.00018	EPA-8081A	1.4	A10	1
alpha-BHC	ND	mg/kg	0.0050	0.00038	EPA-8081A		A10	1
beta-BHC	ND	mg/kg	0.0050	0.00048	EPA-8081A		A10	1
delta-BHC	ND	mg/kg	0.0050	0.00037	EPA-8081A		A10	1
gamma-BHC (Lindane)	ND	mg/kg	0.0050	0.00018	EPA-8081A	4.0	A10	1
Chlordane (Technical)	ND	mg/kg	0.50	0.010	EPA-8081A	2.5	A10	1
4,4'-DDD	**0.0026**	**mg/kg**	**0.0050**	**0.00064**	**EPA-8081A**	1.0	**J,A10**	1
4,4'-DDE	**0.0013**	**mg/kg**	**0.0050**	**0.00095**	**EPA-8081A**	1.0	**J,A10**	1
4,4'-DDT	**0.0013**	**mg/kg**	**0.0050**	**0.00040**	**EPA-8081A**	1.0	**J,A10**	1
Dieldrin	ND	mg/kg	0.0050	0.00036	EPA-8081A	8.0	A10	1
Endosulfan I	ND	mg/kg	0.0050	0.00020	EPA-8081A		A10	1
Endosulfan II	ND	mg/kg	0.0050	0.00034	EPA-8081A		A10	1
Endosulfan sulfate	ND	mg/kg	0.0050	0.00026	EPA-8081A		A10	1
Endrin	ND	mg/kg	0.0050	0.00065	EPA-8081A	0.2	A10	1
Endrin aldehyde	ND	mg/kg	0.0050	0.00018	EPA-8081A		A10	1
Heptachlor	ND	mg/kg	0.0050	0.00086	EPA-8081A	4.7	A10	1
Heptachlor epoxide	ND	mg/kg	0.0050	0.00017	EPA-8081A		A10	1
Methoxychlor	ND	mg/kg	0.0050	0.00094	EPA-8081A	100	A10	1
Toxaphene	ND	mg/kg	0.50	0.014	EPA-8081A	5	A10	1
TCMX (Surrogate)	72.9	%	20 - 130 (LCL - UCL)		EPA-8081A		A10	1
Decachlorobiphenyl (Surrogate)	70.4	%	40 - 130 (LCL - UCL)		EPA-8081A		A10	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 13:11	RSM	GC-17	10.135	B135108	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-18 | **Client Sample Name:** SS18, 3/16/2022 1:01:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.10	0.023	EPA-8082	50	A10	1
PCB-1221	ND	mg/kg	0.10	0.033	EPA-8082	50	A10	1
PCB-1232	ND	mg/kg	0.10	0.026	EPA-8082	50	A10	1
PCB-1242	ND	mg/kg	0.10	0.015	EPA-8082	50	A10	1
PCB-1248	ND	mg/kg	0.10	0.021	EPA-8082	50	A10	1
PCB-1254	ND	mg/kg	0.10	0.016	EPA-8082	50	A10	1
PCB-1260	ND	mg/kg	0.10	0.018	EPA-8082	50	A10	1
Total PCB's (Summation)	ND	mg/kg	0.10	0.050	EPA-8082	50	A10	1
Decachlorobiphenyl (Surrogate)	167	%	40 - 120 (LCL - UCL)		EPA-8082		A10,S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 14:46	RSM	GC-14	10.135	B135204	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-18 | **Client Sample Name:** SS18, 3/16/2022 1:01:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.030	0.013	EPA-8270C-SIM	ND	A10	1
Acenaphthylene	ND	mg/kg	0.030	0.0092	EPA-8270C-SIM	ND	A10	1
Anthracene	ND	mg/kg	0.030	0.0081	EPA-8270C-SIM	ND	A10	1
Benzo[a]anthracene	ND	mg/kg	0.030	0.0096	EPA-8270C-SIM	ND	A10	1
Benzo[b]fluoranthene	ND	mg/kg	0.030	0.0079	EPA-8270C-SIM	ND	A10	1
Benzo[k]fluoranthene	ND	mg/kg	0.030	0.011	EPA-8270C-SIM	ND	A10	1
Benzo[a]pyrene	ND	mg/kg	0.030	0.0078	EPA-8270C-SIM	ND	A10	1
Benzo[g,h,i]perylene	ND	mg/kg	0.030	0.0072	EPA-8270C-SIM	ND	A10	1
Chrysene	ND	mg/kg	0.030	0.011	EPA-8270C-SIM	ND	A10	1
Dibenzo[a,h]anthracene	ND	mg/kg	0.030	0.0048	EPA-8270C-SIM	ND	A10	1
Fluoranthene	ND	mg/kg	0.030	0.0075	EPA-8270C-SIM	ND	A10	1
Fluorene	ND	mg/kg	0.030	0.0097	EPA-8270C-SIM	ND	A10	1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.030	0.0047	EPA-8270C-SIM	ND	A10	1
Naphthalene	ND	mg/kg	0.030	0.0090	EPA-8270C-SIM	ND	A10	1
Phenanthrene	ND	mg/kg	0.030	0.0086	EPA-8270C-SIM	ND	A10	1
Pyrene	ND	mg/kg	0.030	0.012	EPA-8270C-SIM	ND	A10	1
Nitrobenzene-d5 (Surrogate)	57.5	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	65.0	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	80.0	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 19:39	OLH	MS-B4	10.169	B135191	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-18 | **Client Sample Name:** SS18, 3/16/2022 1:01:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	77.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/19/22 04:08	HP1	GC-V8	0.980	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-18 | **Client Sample Name:** SS18, 3/16/2022 1:01:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	20	4.4	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	**170**	**mg/kg**	**40**	**14**	**EPA-8015B/FFP**	ND	**A57**	1
Tetracosane (Surrogate)	52.0	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 13:36	BUP	GC-2	1.974	B135145	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-18 | **Client Sample Name:** SS18, 3/16/2022 1:01:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.5**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**45**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.083**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	**0.10**	**mg/kg**	**0.50**	**0.052**	**EPA-6010B**	100	**J**	1
Chromium	**5.2**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		1
Cobalt	**1.2**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**12**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**8.1**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000		1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		2
Molybdenum	ND	mg/kg	2.5	0.050	EPA-6010B	3500		1
Nickel	**3.8**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**9.4**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**30**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/22/22 00:32	AK1	PE-OP4	0.980	B134839	EPA 3050B
2	EPA-7471A	03/22/22 10:15	03/22/22 13:22	TMT	CETAC3	1.025	B135016	EPA 7471A

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

BCL Sample ID: 2206102-19 | **Client Sample Name:** SS19, 3/16/2022 1:08:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Aldrin	ND	mg/kg	0.00050	0.000018	EPA-8081A	1.4		1
alpha-BHC	ND	mg/kg	0.00050	0.000038	EPA-8081A			1
beta-BHC	ND	mg/kg	0.00050	0.000048	EPA-8081A			1
delta-BHC	ND	mg/kg	0.00050	0.000037	EPA-8081A			1
gamma-BHC (Lindane)	ND	mg/kg	0.00050	0.000018	EPA-8081A	4.0		1
Chlordane (Technical)	ND	mg/kg	0.050	0.0010	EPA-8081A	2.5		1
4,4'-DDD	ND	mg/kg	0.00050	0.000064	EPA-8081A	1.0		1
4,4'-DDE	ND	mg/kg	0.00050	0.000095	EPA-8081A	1.0		1
4,4'-DDT	ND	mg/kg	0.00050	0.000040	EPA-8081A	1.0		1
Dieldrin	ND	mg/kg	0.00050	0.000036	EPA-8081A	8.0		1
Endosulfan I	ND	mg/kg	0.00050	0.000020	EPA-8081A			1
Endosulfan II	ND	mg/kg	0.00050	0.000034	EPA-8081A			1
Endosulfan sulfate	ND	mg/kg	0.00050	0.000026	EPA-8081A			1
Endrin	ND	mg/kg	0.00050	0.000065	EPA-8081A	0.2		1
Endrin aldehyde	ND	mg/kg	0.00050	0.000018	EPA-8081A			1
Heptachlor	ND	mg/kg	0.00050	0.000086	EPA-8081A	4.7		1
Heptachlor epoxide	ND	mg/kg	0.00050	0.000017	EPA-8081A			1
Methoxychlor	ND	mg/kg	0.00050	0.000094	EPA-8081A	100		1
Toxaphene	ND	mg/kg	0.050	0.0014	EPA-8081A	5		1
TCMX (Surrogate)	101	%	20 - 130 (LCL - UCL)		EPA-8081A			1
Decachlorobiphenyl (Surrogate)	105	%	40 - 130 (LCL - UCL)		EPA-8081A			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8081A	03/22/22 10:30	03/23/22 19:55	RSM	GC-17	1.010	B135108	EPA 3550B

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

BCL Sample ID: 2206102-19 | **Client Sample Name:** SS19, 3/16/2022 1:08:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
PCB-1016	ND	mg/kg	0.010	0.0023	EPA-8082	50		1
PCB-1221	ND	mg/kg	0.010	0.0033	EPA-8082	50		1
PCB-1232	ND	mg/kg	0.010	0.0026	EPA-8082	50		1
PCB-1242	ND	mg/kg	0.010	0.0015	EPA-8082	50		1
PCB-1248	ND	mg/kg	0.010	0.0021	EPA-8082	50		1
PCB-1254	ND	mg/kg	0.010	0.0016	EPA-8082	50		1
PCB-1260	ND	mg/kg	0.010	0.0018	EPA-8082	50		1
Total PCB's (Summation)	ND	mg/kg	0.010	0.0050	EPA-8082	50		1
Decachlorobiphenyl (Surrogate)	158	%	40 - 120 (LCL - UCL)		EPA-8082		S09	1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8082	03/22/22 12:00	03/23/22 14:58	RSM	GC-14	1.017	B135204	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

BCL Sample ID: 2206102-19 | **Client Sample Name:** SS19, 3/16/2022 1:08:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Acenaphthene	ND	mg/kg	0.0030	0.0013	EPA-8270C-SIM	ND		1
Acenaphthylene	ND	mg/kg	0.0030	0.00092	EPA-8270C-SIM	ND		1
Anthracene	ND	mg/kg	0.0030	0.00081	EPA-8270C-SIM	ND		1
Benzo[a]anthracene	ND	mg/kg	0.0030	0.00096	EPA-8270C-SIM	ND		1
Benzo[b]fluoranthene	ND	mg/kg	0.0030	0.00079	EPA-8270C-SIM	ND		1
Benzo[k]fluoranthene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Benzo[a]pyrene	ND	mg/kg	0.0030	0.00078	EPA-8270C-SIM	ND		1
Benzo[g,h,i]perylene	ND	mg/kg	0.0030	0.00072	EPA-8270C-SIM	ND		1
Chrysene	ND	mg/kg	0.0030	0.0011	EPA-8270C-SIM	ND		1
Dibenzo[a,h]anthracene	ND	mg/kg	0.0030	0.00048	EPA-8270C-SIM	ND		1
Fluoranthene	ND	mg/kg	0.0030	0.00075	EPA-8270C-SIM	ND		1
Fluorene	ND	mg/kg	0.0030	0.00097	EPA-8270C-SIM	ND		1
Indeno[1,2,3-cd]pyrene	ND	mg/kg	0.0030	0.00047	EPA-8270C-SIM	ND		1
Naphthalene	ND	mg/kg	0.0030	0.00090	EPA-8270C-SIM	ND		1
Phenanthrene	ND	mg/kg	0.0030	0.00086	EPA-8270C-SIM	ND		1
Pyrene	ND	mg/kg	0.0030	0.0012	EPA-8270C-SIM	ND		1
Nitrobenzene-d5 (Surrogate)	108	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1
2-Fluorobiphenyl (Surrogate)	89.8	%	40 - 130 (LCL - UCL)		EPA-8270C-SIM			1
p-Terphenyl-d14 (Surrogate)	106	%	30 - 130 (LCL - UCL)		EPA-8270C-SIM			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8270C-SIM	03/22/22 13:00	03/23/22 19:15	OLH	MS-B4	0.973	B135191	EPA 3550B

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-19 | **Client Sample Name:** SS19, 3/16/2022 1:08:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
Gasoline Range Organics (C4 - C12)	ND	mg/kg	1.0	0.20	EPA-8015B	ND		1
a,a,a-Trifluorotoluene (FID Surrogate)	72.5	%	70 - 130 (LCL - UCL)		EPA-8015B			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B	03/18/22 11:42	03/21/22 12:33	HP1	GC-V8	0.990	B134548	EPA 5030 Soil GC

DCN = Data Continuation Number

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

BCL Sample ID: 2206102-19 | **Client Sample Name:** SS19, 3/16/2022 1:08:00PM

Constituent	Result	Units	PQL	MDL	Method	MB Bias	Lab Quals	DCN
TPH - Diesel (FFP)	ND	mg/kg	10	2.2	EPA-8015B/FFP	ND		1
TPH - Hydraulic Oil / Motor Oil	ND	mg/kg	20	7.0	EPA-8015B/FFP	ND		1
Tetracosane (Surrogate)	102	%	40 - 130 (LCL - UCL)		EPA-8015B/FFP			1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-8015B/FFP	03/22/22 14:00	03/23/22 12:28	BUP	GC-2	0.987	B135145	EPA 3550B

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

BCL Sample ID: 2206102-19 | **Client Sample Name:** SS19, 3/16/2022 1:08:00PM

Constituent	Result	Units	PQL	MDL	Method	TTLC Limits	Lab Quals	DCN
Antimony	ND	mg/kg	5.0	0.33	EPA-6010B	500		1
Arsenic	**1.6**	**mg/kg**	**1.0**	**0.40**	**EPA-6010B**	500		1
Barium	**22**	**mg/kg**	**0.50**	**0.18**	**EPA-6010B**	10000		1
Beryllium	**0.066**	**mg/kg**	**0.50**	**0.047**	**EPA-6010B**	75	**J**	1
Cadmium	ND	mg/kg	0.50	0.052	EPA-6010B	100		1
Chromium	**2.7**	**mg/kg**	**0.50**	**0.050**	**EPA-6010B**	2500		2
Cobalt	**0.89**	**mg/kg**	**2.5**	**0.098**	**EPA-6010B**	8000	**J**	1
Copper	**1.7**	**mg/kg**	**1.0**	**0.050**	**EPA-6010B**	2500		1
Lead	**1.4**	**mg/kg**	**2.5**	**0.41**	**EPA-6010B**	1000	**J**	1
Mercury	ND	mg/kg	0.16	0.016	EPA-7471A	20		3
Molybdenum	**0.16**	**mg/kg**	**2.5**	**0.050**	**EPA-6010B**	3500	**J**	1
Nickel	**3.2**	**mg/kg**	**0.50**	**0.15**	**EPA-6010B**	2000		1
Selenium	ND	mg/kg	1.0	0.98	EPA-6010B	100		1
Silver	ND	mg/kg	0.50	0.067	EPA-6010B	500		1
Thallium	ND	mg/kg	5.0	0.64	EPA-6010B	700		1
Vanadium	**5.3**	**mg/kg**	**0.50**	**0.11**	**EPA-6010B**	2400		1
Zinc	**7.4**	**mg/kg**	**2.5**	**0.087**	**EPA-6010B**	5000		1

DCN	Method	Prep Date	Run Date/Time	Analyst	Instrument	Dilution	QC Batch ID	Prep Method
1	EPA-6010B	03/18/22 18:40	03/21/22 12:58	JCC	PE-OP4	1	B134840	EPA 3050B
2	EPA-6010B	03/25/22 10:30	03/25/22 21:16	AK1	PE-OP3	0.952	B135328	EPA 3050B
3	EPA-7471A	03/22/22 10:15	03/22/22 13:28	TMT	CETAC3	1.025	B135016	EPA 7471A

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

Quality Control Report - Method Blank Analysis

Constituent	QC Sample ID	MB Result	Units	PQL	MDL	Lab Quals
QC Batch ID: B135108						
Aldrin	B135108-BLK1	ND	mg/kg	0.00050	0.000018	
alpha-BHC	B135108-BLK1	ND	mg/kg	0.00050	0.000038	
beta-BHC	B135108-BLK1	ND	mg/kg	0.00050	0.000048	
delta-BHC	B135108-BLK1	ND	mg/kg	0.00050	0.000037	
gamma-BHC (Lindane)	B135108-BLK1	ND	mg/kg	0.00050	0.000018	
Chlordane (Technical)	B135108-BLK1	ND	mg/kg	0.050	0.0010	
4,4'-DDD	B135108-BLK1	ND	mg/kg	0.00050	0.000064	
4,4'-DDE	B135108-BLK1	ND	mg/kg	0.00050	0.000095	
4,4'-DDT	B135108-BLK1	ND	mg/kg	0.00050	0.000040	
Dieldrin	B135108-BLK1	ND	mg/kg	0.00050	0.000036	
Endosulfan I	B135108-BLK1	ND	mg/kg	0.00050	0.000020	
Endosulfan II	B135108-BLK1	ND	mg/kg	0.00050	0.000034	
Endosulfan sulfate	B135108-BLK1	ND	mg/kg	0.00050	0.000026	
Endrin	B135108-BLK1	ND	mg/kg	0.00050	0.000065	
Endrin aldehyde	B135108-BLK1	ND	mg/kg	0.00050	0.000018	
Heptachlor	B135108-BLK1	ND	mg/kg	0.00050	0.000086	
Heptachlor epoxide	B135108-BLK1	ND	mg/kg	0.00050	0.000017	
Methoxychlor	B135108-BLK1	ND	mg/kg	0.00050	0.000094	
Toxaphene	B135108-BLK1	ND	mg/kg	0.050	0.0014	
TCMX (Surrogate)	**B135108-BLK1**	**95.3**	%	**20 - 130 (LCL - UCL)**		
Decachlorobiphenyl (Surrogate)	**B135108-BLK1**	**103**	%	**40 - 130 (LCL - UCL)**		

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

Quality Control Report - Laboratory Control Sample

Constituent	QC Sample ID	Type	Result	Spike Level	Units	Percent Recovery	RPD	Control Limits Percent Recovery	Control Limits RPD	Lab Quals
QC Batch ID: B135108										
Aldrin	B135108-BS1	LCS	0.0055589	0.0049342	mg/kg	113		70 - 130		
gamma-BHC (Lindane)	B135108-BS1	LCS	0.0056079	0.0049342	mg/kg	114		60 - 140		
4,4'-DDT	B135108-BS1	LCS	0.0048263	0.0049342	mg/kg	97.8		60 - 140		
Dieldrin	B135108-BS1	LCS	0.0055740	0.0049342	mg/kg	113		70 - 130		
Endrin	B135108-BS1	LCS	0.0045414	0.0049342	mg/kg	92.0		60 - 140		
Heptachlor	B135108-BS1	LCS	0.0054490	0.0049342	mg/kg	110		60 - 140		
TCMX (Surrogate)	B135108-BS1	LCS	0.011438	0.0098684	mg/kg	116		20 - 130		
Decachlorobiphenyl (Surrogate)	B135108-BS1	LCS	0.024224	0.019737	mg/kg	123		40 - 130		

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Organochlorine Pesticides (EPA Method 8081A)

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B135108	Used client sample: Y - Description: SS5, 03/16/2022 10:43										
Aldrin	MS	2206102-05	ND	0.0054132	0.0050847	mg/kg		106		50 - 140	
	MSD	2206102-05	ND	0.0051769	0.0050847	mg/kg	4.5	102	30	50 - 140	
gamma-BHC (Lindane)	MS	2206102-05	ND	0.0046749	0.0050847	mg/kg		91.9		50 - 140	
	MSD	2206102-05	ND	0.0044756	0.0050847	mg/kg	4.4	88.0	30	50 - 140	
4,4'-DDT	MS	2206102-05	ND	0.0040407	0.0050847	mg/kg		79.5		50 - 140	
	MSD	2206102-05	ND	0.0041505	0.0050847	mg/kg	2.7	81.6	30	50 - 140	
Dieldrin	MS	2206102-05	ND	0.0043369	0.0050847	mg/kg		85.3		40 - 140	
	MSD	2206102-05	ND	0.0041549	0.0050847	mg/kg	4.3	81.7	30	40 - 140	
Endrin	MS	2206102-05	ND	0.0045980	0.0050847	mg/kg		90.4		50 - 150	
	MSD	2206102-05	ND	0.0045885	0.0050847	mg/kg	0.2	90.2	30	50 - 150	
Heptachlor	MS	2206102-05	ND	0.0049190	0.0050847	mg/kg		96.7		60 - 140	
	MSD	2206102-05	ND	0.0046447	0.0050847	mg/kg	5.7	91.3	30	60 - 140	
TCMX (Surrogate)	MS	2206102-05	ND	0.0070949	0.010169	mg/kg		69.8		20 - 130	
	MSD	2206102-05	ND	0.0090278	0.010169	mg/kg	24.0	88.8		20 - 130	
Decachlorobiphenyl (Surrogate)	MS	2206102-05	ND	0.017560	0.020339	mg/kg		86.3		40 - 130	
	MSD	2206102-05	ND	0.018866	0.020339	mg/kg	7.2	92.8		40 - 130	

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Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

Quality Control Report - Method Blank Analysis

Constituent	QC Sample ID	MB Result	Units	PQL	MDL	Lab Quals
QC Batch ID: B135204						
PCB-1016	B135204-BLK1	ND	mg/kg	0.010	0.0023	
PCB-1221	B135204-BLK1	ND	mg/kg	0.010	0.0033	
PCB-1232	B135204-BLK1	ND	mg/kg	0.010	0.0026	
PCB-1242	B135204-BLK1	ND	mg/kg	0.010	0.0015	
PCB-1248	B135204-BLK1	ND	mg/kg	0.010	0.0021	
PCB-1254	B135204-BLK1	ND	mg/kg	0.010	0.0016	
PCB-1260	B135204-BLK1	ND	mg/kg	0.010	0.0018	
Total PCB's (Summation)	B135204-BLK1	ND	mg/kg	0.010	0.0050	
Decachlorobiphenyl (Surrogate)	**B135204-BLK1**	**112**	%	**40 - 120 (LCL - UCL)**		

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

Quality Control Report - Laboratory Control Sample

Constituent	QC Sample ID	Type	Result	Spike Level	Units	Percent Recovery	RPD	Control Limits Percent Recovery	Control Limits RPD	Lab Quals
QC Batch ID: B135204										
PCB-1016	B135204-BS1	LCS	0.097966	0.084746	mg/kg	116		60 - 120		
PCB-1260	B135204-BS1	LCS	0.095254	0.084746	mg/kg	112		60 - 120		
Decachlorobiphenyl (Surrogate)	B135204-BS1	LCS	0.023051	0.020339	mg/kg	113		40 - 120		

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

PCB Analysis (EPA Method 8082)

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B135204	Used client sample: Y - Description: SS2, 03/16/2022 10:07										
PCB-1016	MS	**2206102-02**	**ND**	**3.7772**	**0.082781**	**mg/kg**		**4560**		**60 - 120**	**A10,Q03**
	MSD	**2206102-02**	**ND**	**1.2372**	**0.083056**	**mg/kg**	**101**	**1490**	**30**	**60 - 120**	**Q02,Q03**
PCB-1260	MS	**2206102-02**	**ND**	**0.10530**	**0.082781**	**mg/kg**		**127**		**60 - 120**	**A10,Q03**
	MSD	**2206102-02**	**ND**	**0.10332**	**0.083056**	**mg/kg**	**1.9**	**124**	**30**	**60 - 120**	**Q03**
Decachlorobiphenyl (Surrogate)	MS	**2206102-02**	**ND**	**0.025497**	**0.019868**	**mg/kg**		**128**		**40 - 120**	**A10,S09**
	MSD	**2206102-02**	**ND**	**0.025249**	**0.019934**	**mg/kg**	**1.0**	**127**		**40 - 120**	**S09**

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

Quality Control Report - Method Blank Analysis

Constituent	QC Sample ID	MB Result	Units	PQL	MDL	Lab Quals
QC Batch ID: B135191						
Acenaphthene	B135191-BLK1	ND	mg/kg	0.0030	0.0013	
Acenaphthylene	B135191-BLK1	ND	mg/kg	0.0030	0.00092	
Anthracene	B135191-BLK1	ND	mg/kg	0.0030	0.00081	
Benzo[a]anthracene	B135191-BLK1	ND	mg/kg	0.0030	0.00096	
Benzo[b]fluoranthene	B135191-BLK1	ND	mg/kg	0.0030	0.00079	
Benzo[k]fluoranthene	B135191-BLK1	ND	mg/kg	0.0030	0.0011	
Benzo[a]pyrene	B135191-BLK1	ND	mg/kg	0.0030	0.00078	
Benzo[g,h,i]perylene	B135191-BLK1	ND	mg/kg	0.0030	0.00072	
Chrysene	B135191-BLK1	ND	mg/kg	0.0030	0.0011	
Dibenzo[a,h]anthracene	B135191-BLK1	ND	mg/kg	0.0030	0.00048	
Fluoranthene	B135191-BLK1	ND	mg/kg	0.0030	0.00075	
Fluorene	B135191-BLK1	ND	mg/kg	0.0030	0.00097	
Indeno[1,2,3-cd]pyrene	B135191-BLK1	ND	mg/kg	0.0030	0.00047	
Naphthalene	B135191-BLK1	ND	mg/kg	0.0030	0.00090	
Phenanthrene	B135191-BLK1	ND	mg/kg	0.0030	0.00086	
Pyrene	B135191-BLK1	ND	mg/kg	0.0030	0.0012	
Nitrobenzene-d5 (Surrogate)	**B135191-BLK1**	**68.8**	%	**30 - 130 (LCL - UCL)**		
2-Fluorobiphenyl (Surrogate)	**B135191-BLK1**	**62.6**	%	**40 - 130 (LCL - UCL)**		
p-Terphenyl-d14 (Surrogate)	**B135191-BLK1**	**84.2**	%	**30 - 130 (LCL - UCL)**		

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Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

Quality Control Report - Laboratory Control Sample

Constituent	QC Sample ID	Type	Result	Spike Level	Units	Percent Recovery	RPD	Control Limits Percent Recovery	Control Limits RPD	Lab Quals
QC Batch ID: B135191										
Acenaphthene	B135191-BS1	LCS	0.028013	0.032787	mg/kg	85.4		60 - 130		
Acenaphthylene	B135191-BS1	LCS	0.028328	0.032787	mg/kg	86.4		60 - 130		
Anthracene	B135191-BS1	LCS	0.029272	0.032787	mg/kg	89.3		60 - 130		
Benzo[a]anthracene	B135191-BS1	LCS	0.030846	0.032787	mg/kg	94.1		60 - 130		
Benzo[b]fluoranthene	B135191-BS1	LCS	0.037456	0.032787	mg/kg	114		50 - 130		
Benzo[k]fluoranthene	B135191-BS1	LCS	0.031161	0.032787	mg/kg	95.0		60 - 130		
Benzo[a]pyrene	B135191-BS1	LCS	0.029272	0.032787	mg/kg	89.3		60 - 130		
Benzo[g,h,i]perylene	B135191-BS1	LCS	0.026754	0.032787	mg/kg	81.6		50 - 130		
Chrysene	B135191-BS1	LCS	0.029902	0.032787	mg/kg	91.2		50 - 130		
Dibenzo[a,h]anthracene	B135191-BS1	LCS	0.032420	0.032787	mg/kg	98.9		50 - 130		
Fluoranthene	B135191-BS1	LCS	0.028643	0.032787	mg/kg	87.4		60 - 130		
Fluorene	B135191-BS1	LCS	0.028328	0.032787	mg/kg	86.4		50 - 130		
Indeno[1,2,3-cd]pyrene	B135191-BS1	LCS	0.028957	0.032787	mg/kg	88.3		50 - 130		
Naphthalene	B135191-BS1	LCS	0.027384	0.032787	mg/kg	83.5		50 - 130		
Phenanthrene	B135191-BS1	LCS	0.028643	0.032787	mg/kg	87.4		50 - 130		
Pyrene	B135191-BS1	LCS	0.031790	0.032787	mg/kg	97.0		50 - 130		
Nitrobenzene-d5 (Surrogate)	B135191-BS1	LCS	0.14762	0.13115	mg/kg	113		30 - 130		
2-Fluorobiphenyl (Surrogate)	B135191-BS1	LCS	0.12338	0.13115	mg/kg	94.1		40 - 130		
p-Terphenyl-d14 (Surrogate)	B135191-BS1	LCS	0.14384	0.13115	mg/kg	110		30 - 130		

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Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B135191	Used client sample: Y - Description: SS7, 03/16/2022 10:50										
Acenaphthene	MS	2206102-07	ND	0.026959	0.033784	mg/kg		79.8		50 - 130	
	MSD	2206102-07	ND	0.027905	0.033898	mg/kg	3.4	82.3	30	50 - 130	
Acenaphthylene	MS	2206102-07	ND	0.027922	0.033784	mg/kg		82.6		50 - 130	
	MSD	2206102-07	ND	0.028569	0.033898	mg/kg	2.3	84.3	30	50 - 130	
Anthracene	MS	2206102-07	ND	0.029206	0.033784	mg/kg		86.4		50 - 130	
	MSD	2206102-07	ND	0.029234	0.033898	mg/kg	0.1	86.2	30	50 - 130	
Benzo[a]anthracene	MS	2206102-07	ND	0.032416	0.033784	mg/kg		95.9		50 - 130	
	MSD	2206102-07	ND	0.033553	0.033898	mg/kg	3.4	99.0	30	50 - 130	
Benzo[b]fluoranthene	MS	2206102-07	ND	0.038193	0.033784	mg/kg		113		40 - 130	
	MSD	2206102-07	ND	0.037871	0.033898	mg/kg	0.8	112	30	40 - 130	
Benzo[k]fluoranthene	MS	2206102-07	ND	0.030490	0.033784	mg/kg		90.3		40 - 130	
	MSD	2206102-07	ND	0.031892	0.033898	mg/kg	4.5	94.1	30	40 - 130	
Benzo[a]pyrene	MS	2206102-07	ND	0.033378	0.033784	mg/kg		98.8		40 - 130	
	MSD	2206102-07	ND	0.033220	0.033898	mg/kg	0.5	98.0	30	40 - 130	
Benzo[g,h,i]perylene	MS	2206102-07	ND	0.027601	0.033784	mg/kg		81.7		40 - 130	
	MSD	2206102-07	ND	0.028569	0.033898	mg/kg	3.4	84.3	30	40 - 130	
Chrysene	MS	2206102-07	ND	0.031132	0.033784	mg/kg		92.2		40 - 130	
	MSD	2206102-07	ND	0.032224	0.033898	mg/kg	3.4	95.1	30	40 - 130	
Dibenzo[a,h]anthracene	MS	2206102-07	ND	0.033699	0.033784	mg/kg		99.7		40 - 130	
	MSD	2206102-07	ND	0.032556	0.033898	mg/kg	3.5	96.0	30	40 - 130	
Fluoranthene	MS	2206102-07	ND	0.029527	0.033784	mg/kg		87.4		40 - 130	
	MSD	2206102-07	ND	0.030231	0.033898	mg/kg	2.4	89.2	30	40 - 130	
Fluorene	MS	2206102-07	ND	0.027922	0.033784	mg/kg		82.6		40 - 130	
	MSD	2206102-07	ND	0.028569	0.033898	mg/kg	2.3	84.3	30	40 - 130	
Indeno[1,2,3-cd]pyrene	MS	2206102-07	ND	0.029848	0.033784	mg/kg		88.4		30 - 130	
	MSD	2206102-07	ND	0.031227	0.033898	mg/kg	4.5	92.1	30	30 - 130	
Naphthalene	MS	2206102-07	ND	0.027280	0.033784	mg/kg		80.7		50 - 130	
	MSD	2206102-07	ND	0.027905	0.033898	mg/kg	2.3	82.3	30	50 - 130	
Phenanthrene	MS	2206102-07	ND	0.028564	0.033784	mg/kg		84.6		40 - 130	
	MSD	2206102-07	ND	0.029234	0.033898	mg/kg	2.3	86.2	30	40 - 130	
Pyrene	MS	2206102-07	ND	0.034341	0.033784	mg/kg		102		40 - 130	
	MSD	2206102-07	ND	0.034549	0.033898	mg/kg	0.6	102	30	40 - 130	
Nitrobenzene-d5 (Surrogate)	MS	2206102-07	ND	0.13961	0.13514	mg/kg		103		30 - 130	
	MSD	2206102-07	ND	0.13953	0.13559	mg/kg	0.1	103		30 - 130	
2-Fluorobiphenyl (Surrogate)	MS	2206102-07	ND	0.11554	0.13514	mg/kg		85.5		40 - 130	
	MSD	2206102-07	ND	0.11860	0.13559	mg/kg	2.6	87.5		40 - 130	

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180 North Ashwood Avenue
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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Polynuclear Aromatic Hydrocarbons (EPA Method 8270C-SIM)

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B135191	Used client sample: Y - Description: SS7, 03/16/2022 10:50										
p-Terphenyl-d14 (Surrogate)	MS	2206102-07	ND	0.14346	0.13514	mg/kg		106		30 - 130	
	MSD	2206102-07	ND	0.14318	0.13559	mg/kg	0.2	106		30 - 130	

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Reported: 03/28/2022 12:09
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Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

Quality Control Report - Method Blank Analysis

Constituent	QC Sample ID	MB Result	Units	PQL	MDL	Lab Quals
QC Batch ID: B134548						
Gasoline Range Organics (C4 - C12)	B134548-BLK1	ND	mg/kg	1.0	0.20	
a,a,a-Trifluorotoluene (FID Surrogate)	**B134548-BLK1**	**87.5**	%	**70 - 130 (LCL - UCL)**		

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Reported: 03/28/2022 12:09
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Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Purgeable Aromatics and Total Petroleum Hydrocarbons

Quality Control Report - Laboratory Control Sample

Constituent	QC Sample ID	Type	Result	Spike Level	Units	Percent Recovery	RPD	Control Limits Percent Recovery	Control Limits RPD	Lab Quals
QC Batch ID: B134548										
Gasoline Range Organics (C4 - C12)	B134548-BS1	LCS	5.0160	5.0000	mg/kg	100		85 - 115		
a,a,a-Trifluorotoluene (FID Surrogate)	B134548-BS1	LCS	0.035000	0.040000	mg/kg	87.5		70 - 130		

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Purgeable Aromatics and Total Petroleum Hydrocarbons

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B134548	Used client sample: N										
Gasoline Range Organics (C4 - C12)	MS	2205662-15	ND	4.8180	5.0000	mg/kg		96.4		70 - 130	
	MSD	2205662-15	ND	4.8420	5.0000	mg/kg	0.5	96.8	20	70 - 130	
a,a,a-Trifluorotoluene (FID Surrogate)	MS	2205662-15	ND	0.035000	0.040000	mg/kg		87.5		70 - 130	
	MSD	2205662-15	ND	0.037000	0.040000	mg/kg	5.6	92.5		70 - 130	

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Petroleum Hydrocarbons

Quality Control Report - Method Blank Analysis

Constituent	QC Sample ID	MB Result	Units	PQL	MDL	Lab Quals
QC Batch ID: B135145						
TPH - Diesel (FFP)	B135145-BLK1	ND	mg/kg	10	2.2	
TPH - Hydraulic Oil / Motor Oil	B135145-BLK1	ND	mg/kg	20	7.0	
Tetracosane (Surrogate)	**B135145-BLK1**	**112**	%	**40 - 130 (LCL - UCL)**		

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Project Manager: Scott English

Total Petroleum Hydrocarbons

Quality Control Report - Laboratory Control Sample

Constituent	QC Sample ID	Type	Result	Spike Level	Units	Percent Recovery	RPD	Control Limits Percent Recovery	Control Limits RPD	Lab Quals
QC Batch ID: B135145										
TPH - Diesel (FFP)	B135145-BS1	LCS	70.214	82.237	mg/kg	85.4		64 - 124		
Tetracosane (Surrogate)	B135145-BS1	LCS	3.3650	3.2895	mg/kg	102		40 - 130		

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Project Manager: Scott English

Total Petroleum Hydrocarbons

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B135145	Used client sample: Y - Description: SS4, 03/16/2022 10:10										
TPH - Diesel (FFP)	MS	2206102-04	ND	61.993	82.237	mg/kg		75.4		52 - 131	
	MSD	2206102-04	ND	62.160	84.746	mg/kg	0.3	73.3	30	52 - 131	
Tetracosane (Surrogate)	MS	2206102-04	ND	3.0773	3.2895	mg/kg		93.5		40 - 130	
	MSD	2206102-04	ND	2.9366	3.3898	mg/kg	4.7	86.6		40 - 130	

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Pace Analytical
ENVIRONMENTAL SCIENCES

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

Quality Control Report - Method Blank Analysis

Constituent	QC Sample ID	MB Result	Units	PQL	MDL	Lab Quals
QC Batch ID: B134839						
Antimony	B134839-BLK1	ND	mg/kg	5.0	0.33	
Arsenic	B134839-BLK1	ND	mg/kg	1.0	0.40	
Barium	B134839-BLK1	ND	mg/kg	0.50	0.18	
Beryllium	B134839-BLK1	ND	mg/kg	0.50	0.047	
Cadmium	B134839-BLK1	ND	mg/kg	0.50	0.052	
Chromium	**B134839-BLK1**	**0.079523**	**mg/kg**	**0.50**	**0.050**	**J**
Cobalt	B134839-BLK1	ND	mg/kg	2.5	0.098	
Copper	B134839-BLK1	ND	mg/kg	1.0	0.050	
Lead	B134839-BLK1	ND	mg/kg	2.5	0.41	
Molybdenum	**B134839-BLK1**	**0.14916**	**mg/kg**	**2.5**	**0.050**	**J**
Nickel	B134839-BLK1	ND	mg/kg	0.50	0.15	
Selenium	B134839-BLK1	ND	mg/kg	1.0	0.98	
Silver	B134839-BLK1	ND	mg/kg	0.50	0.067	
Thallium	B134839-BLK1	ND	mg/kg	5.0	0.64	
Vanadium	B134839-BLK1	ND	mg/kg	0.50	0.11	
Zinc	B134839-BLK1	ND	mg/kg	2.5	0.087	
QC Batch ID: B134840						
Antimony	B134840-BLK1	ND	mg/kg	5.0	0.33	
Arsenic	B134840-BLK1	ND	mg/kg	1.0	0.40	
Barium	B134840-BLK1	ND	mg/kg	0.50	0.18	
Beryllium	B134840-BLK1	ND	mg/kg	0.50	0.047	
Cadmium	B134840-BLK1	ND	mg/kg	0.50	0.052	
Cobalt	B134840-BLK1	ND	mg/kg	2.5	0.098	
Copper	**B134840-BLK1**	**0.067959**	**mg/kg**	**1.0**	**0.050**	**J**
Lead	B134840-BLK1	ND	mg/kg	2.5	0.41	
Molybdenum	**B134840-BLK1**	**0.052631**	**mg/kg**	**2.5**	**0.050**	**J**
Nickel	**B134840-BLK1**	**0.25940**	**mg/kg**	**0.50**	**0.15**	**J**
Selenium	B134840-BLK1	ND	mg/kg	1.0	0.98	
Silver	B134840-BLK1	ND	mg/kg	0.50	0.067	
Thallium	B134840-BLK1	ND	mg/kg	5.0	0.64	
Vanadium	B134840-BLK1	ND	mg/kg	0.50	0.11	
Zinc	B134840-BLK1	ND	mg/kg	2.5	0.087	
QC Batch ID: B135015						

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Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

Quality Control Report - Method Blank Analysis

Constituent	QC Sample ID	MB Result	Units	PQL	MDL	Lab Quals
QC Batch ID: B135015						
Mercury	B135015-BLK1	ND	mg/kg	0.16	0.016	
QC Batch ID: B135016						
Mercury	B135016-BLK1	ND	mg/kg	0.16	0.016	
QC Batch ID: B135328						
Chromium	**B135328-BLK1**	**0.11647**	**mg/kg**	**0.50**	**0.050**	**J**

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Total Concentrations (TTLC)

Quality Control Report - Laboratory Control Sample

Constituent	QC Sample ID	Type	Result	Spike Level	Units	Percent Recovery	RPD	Control Limits Percent Recovery	Control Limits RPD	Lab Quals
QC Batch ID: B134839										
Antimony	B134839-BS1	LCS	85.581	100.00	mg/kg	85.6		75 - 125		
Arsenic	B134839-BS1	LCS	17.543	20.000	mg/kg	87.7		75 - 125		
Barium	B134839-BS1	LCS	102.50	100.00	mg/kg	102		75 - 125		
Beryllium	B134839-BS1	LCS	9.1878	10.000	mg/kg	91.9		75 - 125		
Cadmium	B134839-BS1	LCS	8.9789	10.000	mg/kg	89.8		75 - 125		
Chromium	B134839-BS1	LCS	103.30	100.00	mg/kg	103		75 - 125		
Cobalt	B134839-BS1	LCS	101.80	100.00	mg/kg	102		75 - 125		
Copper	B134839-BS1	LCS	97.829	100.00	mg/kg	97.8		75 - 125		
Lead	B134839-BS1	LCS	95.397	100.00	mg/kg	95.4		75 - 125		
Molybdenum	B134839-BS1	LCS	96.049	100.00	mg/kg	96.0		75 - 125		
Nickel	B134839-BS1	LCS	102.79	100.00	mg/kg	103		75 - 125		
Selenium	B134839-BS1	LCS	17.976	20.000	mg/kg	89.9		75 - 125		
Silver	B134839-BS1	LCS	9.0918	10.000	mg/kg	90.9		75 - 125		
Thallium	B134839-BS1	LCS	100.68	100.00	mg/kg	101		75 - 125		
Vanadium	B134839-BS1	LCS	101.42	100.00	mg/kg	101		75 - 125		
Zinc	B134839-BS1	LCS	95.186	100.00	mg/kg	95.2		75 - 125		
QC Batch ID: B134840										
Antimony	B134840-BS1	LCS	79.821	100.00	mg/kg	79.8		75 - 125		
Arsenic	B134840-BS1	LCS	16.584	20.000	mg/kg	82.9		75 - 125		
Barium	B134840-BS1	LCS	90.518	100.00	mg/kg	90.5		75 - 125		
Beryllium	B134840-BS1	LCS	8.5246	10.000	mg/kg	85.2		75 - 125		
Cadmium	B134840-BS1	LCS	8.3280	10.000	mg/kg	83.3		75 - 125		
Cobalt	B134840-BS1	LCS	96.455	100.00	mg/kg	96.5		75 - 125		
Copper	B134840-BS1	LCS	87.485	100.00	mg/kg	87.5		75 - 125		
Lead	B134840-BS1	LCS	90.217	100.00	mg/kg	90.2		75 - 125		
Molybdenum	B134840-BS1	LCS	89.338	100.00	mg/kg	89.3		75 - 125		
Nickel	B134840-BS1	LCS	96.704	100.00	mg/kg	96.7		75 - 125		
Selenium	B134840-BS1	LCS	16.754	20.000	mg/kg	83.8		75 - 125		
Silver	B134840-BS1	LCS	8.4012	10.000	mg/kg	84.0		75 - 125		
Thallium	B134840-BS1	LCS	93.644	100.00	mg/kg	93.6		75 - 125		
Vanadium	B134840-BS1	LCS	96.796	100.00	mg/kg	96.8		75 - 125		
Zinc	B134840-BS1	LCS	94.846	100.00	mg/kg	94.8		75 - 125		
QC Batch ID: B135015										

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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

Quality Control Report - Laboratory Control Sample

Constituent	QC Sample ID	Type	Result	Spike Level	Units	Percent Recovery	RPD	Control Limits Percent Recovery	Control Limits RPD	Lab Quals
QC Batch ID: B135015										
Mercury	B135015-BS1	LCS	0.86880	0.80000	mg/kg	109		80 - 120		
QC Batch ID: B135016										
Mercury	B135016-BS1	LCS	0.81920	0.80000	mg/kg	102		80 - 120		
QC Batch ID: B135328										
Chromium	B135328-BS1	LCS	94.333	100.00	mg/kg	94.3		75 - 125		

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180 North Ashwood Avenue
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Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B134839	Used client sample: Y - Description: SS1, 03/16/2022 09:37										
Antimony	DUP	2206102-01	ND	ND		mg/kg			20		
	MS	2206102-01	ND	72.973	100.00	mg/kg		73.0		16 - 119	
	MSD	2206102-01	ND	73.092	100.00	mg/kg	0.2	73.1	20	16 - 119	
Arsenic	DUP	2206102-01	1.2966	1.3055		mg/kg	0.7		20		
	MS	2206102-01	1.2966	18.528	20.000	mg/kg		86.2		75 - 125	
	MSD	2206102-01	1.2966	17.671	20.000	mg/kg	4.7	81.9	20	75 - 125	
Barium	DUP	**2206102-01**	**9.0317**	**13.751**		**mg/kg**	**41.4**		**20**		**A02**
	MS	**2206102-01**	**9.0317**	**103.68**	**100.00**	**mg/kg**		**94.6**		**75 - 125**	
	MSD	**2206102-01**	**9.0317**	**103.78**	**100.00**	**mg/kg**	**0.1**	**94.8**	**20**	**75 - 125**	
Beryllium	DUP	2206102-01	0.053861	0.056777		mg/kg	5.3		20		J
	MS	2206102-01	0.053861	8.9132	10.000	mg/kg		88.6		75 - 125	
	MSD	2206102-01	0.053861	8.9494	10.000	mg/kg	0.4	89.0	20	75 - 125	
Cadmium	DUP	2206102-01	ND	0.058381		mg/kg			20		J
	MS	2206102-01	ND	8.6622	10.000	mg/kg		86.6		75 - 125	
	MSD	2206102-01	ND	8.8184	10.000	mg/kg	1.8	88.2	20	75 - 125	
Chromium	DUP	2206102-01	3.0137	3.1911		mg/kg	5.7		20		
	MS	2206102-01	3.0137	95.293	100.00	mg/kg		92.3		75 - 125	
	MSD	2206102-01	3.0137	97.374	100.00	mg/kg	2.2	94.4	20	75 - 125	
Cobalt	DUP	**2206102-01**	**0.58729**	**0.73837**		**mg/kg**	**22.8**		**20**		**J,A02**
	MS	**2206102-01**	**0.58729**	**92.970**	**100.00**	**mg/kg**		**92.4**		**75 - 125**	
	MSD	**2206102-01**	**0.58729**	**93.502**	**100.00**	**mg/kg**	**0.6**	**92.9**	**20**	**75 - 125**	
Copper	DUP	2206102-01	2.0017	2.4445		mg/kg	19.9		20		
	MS	2206102-01	2.0017	96.793	100.00	mg/kg		94.8		75 - 125	
	MSD	2206102-01	2.0017	98.860	100.00	mg/kg	2.1	96.9	20	75 - 125	
Lead	DUP	**2206102-01**	**1.3341**	**5.6550**		**mg/kg**	**124**		**20**		**A02**
	MS	**2206102-01**	**1.3341**	**90.326**	**100.00**	**mg/kg**		**89.0**		**75 - 125**	
	MSD	**2206102-01**	**1.3341**	**91.943**	**100.00**	**mg/kg**	**1.8**	**90.6**	**20**	**75 - 125**	
Molybdenum	DUP	2206102-01	ND	ND		mg/kg			20		
	MS	2206102-01	ND	88.894	100.00	mg/kg		88.9		75 - 125	
	MSD	2206102-01	ND	89.981	100.00	mg/kg	1.2	90.0	20	75 - 125	
Nickel	DUP	2206102-01	2.2546	2.4581		mg/kg	8.6		20		
	MS	2206102-01	2.2546	96.276	100.00	mg/kg		94.0		75 - 125	
	MSD	2206102-01	2.2546	97.524	100.00	mg/kg	1.3	95.3	20	75 - 125	
Selenium	DUP	2206102-01	ND	ND		mg/kg			20		
	MS	2206102-01	ND	16.811	20.000	mg/kg		84.1		75 - 125	
	MSD	2206102-01	ND	16.882	20.000	mg/kg	0.4	84.4	20	75 - 125	
Silver	DUP	2206102-01	ND	ND		mg/kg			20		
	MS	2206102-01	ND	8.5085	10.000	mg/kg		85.1		75 - 125	
	MSD	2206102-01	ND	8.4947	10.000	mg/kg	0.2	84.9	20	75 - 125	

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ENVIRONMENTAL SCIENCES

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180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Total Concentrations (TTLC)

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B134839	Used client sample: Y - Description: SS1, 03/16/2022 09:37										
Thallium	DUP	2206102-01	ND	ND		mg/kg			20		
	MS	2206102-01	ND	101.28	100.00	mg/kg		101		75 - 125	
	MSD	2206102-01	ND	100.48	100.00	mg/kg	0.8	100	20	75 - 125	
Vanadium	DUP	**2206102-01**	**3.8408**	**4.7700**		**mg/kg**	**21.6**		**20**		
	MS	**2206102-01**	**3.8408**	**96.587**	**100.00**	**mg/kg**		**92.7**		**75 - 125**	
	MSD	**2206102-01**	**3.8408**	**97.004**	**100.00**	**mg/kg**	**0.4**	**93.2**	**20**	**75 - 125**	
Zinc	DUP	2206102-01	6.7800	7.2726		mg/kg	7.0		20		
	MS	2206102-01	6.7800	95.070	100.00	mg/kg		88.3		75 - 125	
	MSD	2206102-01	6.7800	96.982	100.00	mg/kg	2.0	90.2	20	75 - 125	
QC Batch ID: B134840	Used client sample: Y - Description: SS19, 03/16/2022 13:08										
Antimony	DUP	2206102-19	ND	ND		mg/kg			20		
	MS	2206102-19	ND	64.948	100.00	mg/kg		64.9		16 - 119	
	MSD	2206102-19	ND	62.997	100.00	mg/kg	3.0	63.0	20	16 - 119	
Arsenic	DUP	2206102-19	1.5543	1.3692		mg/kg	12.7		20		
	MS	2206102-19	1.5543	18.726	20.000	mg/kg		85.9		75 - 125	
	MSD	2206102-19	1.5543	18.246	20.000	mg/kg	2.6	83.5	20	75 - 125	
Barium	DUP	**2206102-19**	**22.123**	**18.066**		**mg/kg**	**20.2**		**20**		**Q01**
	MS	**2206102-19**	**22.123**	**104.44**	**100.00**	**mg/kg**		**82.3**		**75 - 125**	
	MSD	**2206102-19**	**22.123**	**111.67**	**100.00**	**mg/kg**	**6.7**	**89.5**	**20**	**75 - 125**	
Beryllium	DUP	2206102-19	0.066099	0.059856		mg/kg	9.9		20		J
	MS	2206102-19	0.066099	8.6913	10.000	mg/kg		86.3		75 - 125	
	MSD	2206102-19	0.066099	8.5890	10.000	mg/kg	1.2	85.2	20	75 - 125	
Cadmium	DUP	2206102-19	ND	ND		mg/kg			20		
	MS	2206102-19	ND	8.4716	10.000	mg/kg		84.7		75 - 125	
	MSD	2206102-19	ND	8.4085	10.000	mg/kg	0.7	84.1	20	75 - 125	
Cobalt	DUP	2206102-19	0.88893	0.89306		mg/kg	0.5		20		J
	MS	2206102-19	0.88893	91.483	100.00	mg/kg		90.6		75 - 125	
	MSD	2206102-19	0.88893	88.982	100.00	mg/kg	2.8	88.1	20	75 - 125	
Copper	DUP	2206102-19	1.7121	1.5644		mg/kg	9.0		20		
	MS	2206102-19	1.7121	92.538	100.00	mg/kg		90.8		75 - 125	
	MSD	2206102-19	1.7121	89.144	100.00	mg/kg	3.7	87.4	20	75 - 125	
Lead	DUP	2206102-19	1.3822	1.3966		mg/kg	1.0		20		J
	MS	2206102-19	1.3822	89.490	100.00	mg/kg		88.1		75 - 125	
	MSD	2206102-19	1.3822	87.926	100.00	mg/kg	1.8	86.5	20	75 - 125	
Molybdenum	DUP	2206102-19	0.15692	ND		mg/kg			20		
	MS	2206102-19	0.15692	85.279	100.00	mg/kg		85.1		75 - 125	
	MSD	2206102-19	0.15692	84.038	100.00	mg/kg	1.5	83.9	20	75 - 125	

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Total Concentrations (TTLC)

Quality Control Report - Precision & Accuracy

Constituent	Type	Source Sample ID	Source Result	Result	Spike Added	Units	RPD	Percent Recovery	Control Limits RPD	Control Limits Percent Recovery	Lab Quals
QC Batch ID: B134840	Used client sample: Y - Description: SS19, 03/16/2022 13:08										
Nickel	DUP	2206102-19	3.1726	2.9186		mg/kg	8.3		20		
	MS	2206102-19	3.1726	94.790	100.00	mg/kg		91.6		75 - 125	
	MSD	2206102-19	3.1726	93.296	100.00	mg/kg	1.6	90.1	20	75 - 125	
Selenium	DUP	2206102-19	ND	ND		mg/kg			20		
	MS	2206102-19	ND	16.782	20.000	mg/kg		83.9		75 - 125	
	MSD	2206102-19	ND	16.204	20.000	mg/kg	3.5	81.0	20	75 - 125	
Silver	DUP	2206102-19	ND	ND		mg/kg			20		
	MS	2206102-19	ND	8.1625	10.000	mg/kg		81.6		75 - 125	
	MSD	2206102-19	ND	8.0989	10.000	mg/kg	0.8	81.0	20	75 - 125	
Thallium	DUP	2206102-19	ND	ND		mg/kg			20		
	MS	2206102-19	ND	98.262	100.00	mg/kg		98.3		75 - 125	
	MSD	2206102-19	ND	95.884	100.00	mg/kg	2.4	95.9	20	75 - 125	
Vanadium	DUP	2206102-19	5.2946	5.1572		mg/kg	2.6		20		
	MS	2206102-19	5.2946	94.670	100.00	mg/kg		89.4		75 - 125	
	MSD	2206102-19	5.2946	95.217	100.00	mg/kg	0.6	89.9	20	75 - 125	
Zinc	DUP	2206102-19	7.4314	7.4793		mg/kg	0.6		20		
	MS	2206102-19	7.4314	97.606	100.00	mg/kg		90.2		75 - 125	
	MSD	2206102-19	7.4314	98.121	100.00	mg/kg	0.5	90.7	20	75 - 125	
QC Batch ID: B135015	Used client sample: N										
Mercury	DUP	2206099-10	0.076667	0.078254		mg/kg	2.0		20		J
	MS	2206099-10	0.076667	0.90317	0.79365	mg/kg		104		80 - 120	
	MSD	2206099-10	0.076667	0.89841	0.79365	mg/kg	0.5	104	20	80 - 120	
QC Batch ID: B135016	Used client sample: Y - Description: SS15, 03/16/2022 12:17										
Mercury	DUP	**2206102-15**	**0.021129**	**0.017097**		**mg/kg**	**21.1**		**20**		**J,A02**
	MS	**2206102-15**	**0.021129**	**0.77097**	**0.80645**	**mg/kg**		**93.0**		**80 - 120**	
	MSD	**2206102-15**	**0.021129**	**0.77097**	**0.80645**	**mg/kg**	**0**	**93.0**	**20**	**80 - 120**	
QC Batch ID: B135328	Used client sample: N										
Chromium	DUP	**2206627-02**	**0.26261**	**1.4165**		**mg/kg**	**137**		**20**		**Q01**
	MS	**2206627-02**	**0.26261**	**95.156**	**100.00**	**mg/kg**		**94.9**		**75 - 125**	
	MSD	**2206627-02**	**0.26261**	**94.558**	**100.00**	**mg/kg**	**0.6**	**94.3**	**20**	**75 - 125**	

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.
All results listed in this report are for the exclusive use of the submitting party. Pace Analytical assumes no responsibility for report alteration, separation, detachment or third party interpretation.

Rincon Consultants-Ventura
180 North Ashwood Avenue
Ventura, CA 93003

Reported: 03/28/2022 12:09
Project: Soil Samples
Project Number: 21-11153 Oxnard Sand Study
Project Manager: Scott English

Notes And Definitions

J	Estimated Value (CLP Flag)
MDL	Method Detection Limit
ND	Analyte Not Detected
PQL	Practical Quantitation Limit
A02	The difference between duplicate readings is less than the quantitation limit.
A10	Detection and quantitation limits were raised due to matrix interference.
A52	Chromatogram not typical of diesel.
A57	Chromatogram not typical of motor oil.
Q01	Sample precision is not within the control limits.
Q02	Matrix spike precision is not within the control limits.
Q03	Matrix spike recovery(s) was(were) not within the control limits.
S09	The surrogate recovery for this compound was not within the control limits.

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.
All results listed in this report are for the exclusive use of the submitting party. Pace Analytical assumes no responsibility for report alteration, separation, detachment or third party interpretation.

NOTICE OF EXEMPTION (NOE)

☐ **To:** Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: City of Oxnard
Community Development Department
214 South C Street
Oxnard, CA 93030

☐ **To:** Ventura County Clerk-Recorder &
Registrar of Voters
Hall of Administration, Main Plaza
800 South Victoria Avenue,
Ventura, CA 93009-1260

Project Title: Oxnard Sand Management Plan

Project Applicant: Brian Yanez, Assistant Public Works Director on behalf of the City of Oxnard

Project Location - Specific: West of Harbor Boulevard, South of Fifth Street, North of Channel Islands Boulevard, and approximately 400 feet east of the Pacific Ocean, within the City of Oxnard within the County of Ventura

Description of Nature, Purpose an Beneficiaries of Project: A request for a Coastal Development Permit to implement a Sand Management Plan for the coastal areas generally within the Oxnard Shores community. The coastal areas in the city of Oxnard experience severe wind events that result in wind-blown beach sand accumulating on vacant private lots and public beach access points (access points). The accumulated sand moves from the vacant lots and access points to streets, sidewalks, walkways, and parking lots resulting in slippery and unsafe conditions for motorists and pedestrians. The project includes collecting wind-blown beach sand from beach access points, sidewalks, streets, and walkways and redepositing the sand back onto the beach at 13 locations. The sand would be redeposited and groomed over the entire sand placement area to a maximum depth of less than six inches above the existing elevation. The sand placement areas have been identified to accommodate the amount of sand expected to be redeposited. The implementation of the project is anticipated to occur monthly but will depend largely on wind velocity and storm frequency. (City of Oxnard)

Name of Public Agency Approving Project (Lead Agency): City of Oxnard

Name of Person or Agency Carrying Out Project (Applicant): Brian Yanez, Assistant Public Works Director on behalf of the City of Oxnard

Exempt Status: (check one):

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☑ Categorical Exemption. State type and section number:__15304 (Minor Alterations to Land)_____
- ☐ Statutory Exemptions. State code number: _____

Reason(s) why project is exempt: In accordance with Section 15304 (Class 4, Minor Alterations to Land) of the State of California Environmental Quality Act (CEQA) Guidelines, projects involving "minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes" may be found to be exempt from the requirements of CEQA. This proposed Project meets the requirements of a Class 4 Categorical Exemption because it consists of removal of relatively moderate quantities of sand from existing developed streets, walkways, parking lots, and beach access points within coastal adjacent areas, and redeposited on the beach. Equipment used in the movement of the sand to be deposited will remain above the high tide line and will not enter the water and the placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species. The equipment will use existing beach access points, currently used for other beach maintenance activities, so there is not a need for creation of new access points. A Biological Resources Assessment report was prepared and found that there were no special status plants or wildlife species in the proposed areas of work. No new development or removal of native vegetation is proposed. Training shall be provided to all staff by a qualified biologist to ensure they are aware of the environment and follow all best practices. Based on review of the Biological Resources Assessment, no Exceptions to the Exemptions (Section 15300.2) apply to defeat the Exemption. Therefore, staff has determined that there is no substantial evidence that the project will have a significant effect on the environment

Lead Agency Contact Person: Joe Pearson II, AICP, Planning and Environmental Services Manager, 805-385-8272

_____ _____

Joe Pearson II, AICP Date
Planning and Environmental Services Manager
City of Oxnard

Note: Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

RESOLUTION NO. 2024-XX

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF OXNARD APPROVING PLANNING AND ZONING PERMIT NO. 22-400-06 (COASTAL DEVELOPMENT PERMIT) TO AUTHORIZE IMPLEMENTATION OF A SAND MANAGEMENT PLAN FOR THE COASTAL AREAS GENERALLY WITHIN THE OXNARD SHORES COMMUNITY GENERALLY LOCATED WEST OF HARBOR BOULEVARD, SOUTH OF FIFTH STREET, NORTH OF CHANNEL ISLANDS BOULEVARD, AND APPROXIMATELY 400 FEET EAST OF THE PACIFIC OCEAN, WITHIN THE CITY OF OXNARD. SUBJECT TO CERTAIN FINDINGS AND CONDITIONS. FILED BY BRIAN YANEZ, ASSISTANT PUBLIC WORKS DIRECTOR ON BEHALF OF THE CITY OF OXNARD.

WHEREAS, on September 12, 2022, Brian Yanez, Assistant Public Works Director on behalf of the City of Oxnard (the "Applicant"), submitted a request for a Coastal Development Permit, to implement a Sand Management Plan for the coastal areas generally within the Oxnard Shores community generally located West of Harbor Boulevard, South of Fifth Street, North of Channel Islands Boulevard, and approximately 400 feet east of the Pacific Ocean, within the City of Oxnard; and

WHEREAS, on October 17, 2024, the Planning Commission of the City of Oxnard (**"Planning Commission"**) conducted a duly noticed public hearing to consider Applicant's request to approve Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) to implement a Sand Management Plan for the coastal areas generally within the Oxnard Shores community generally located West of Harbor Boulevard, South of Fifth Street, North of Channel Islands Boulevard, and approximately 400 feet east of the Pacific Ocean, within the City of Oxnard; and

WHEREAS, the Planning and Environmental Services Division has completed a preliminary environmental assessment of the Project in accordance with the California Environmental Quality Act (CEQA) and determined that the Project is subject to a Class 4 Categorical Exemption (Section 15304). Further, the project does not trigger any of the Exceptions to the Exemptions (Section 15300.2) to defeat the Exemption:

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

The project area generally includes the Oxnard Shores area extending from West 5th Street to the north and West Channel Islands Boulevard to the south within the City of Oxnard Jurisdiction. The project area is generally developed with residential, hotels, parks, public parking, and streets. Due to the overall size of the project area some areas of work are adjacent to sensitive habitats. A Biological Resources Assessment report was prepared and found that there were no special status plants or wildlife species in the proposed areas of work. The project includes conditions to ensure no resources are impacted. Therefore, the project will have no significant impact on an environmental resource of hazardous or critical concern.

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

The proposed Coastal Development Permit to implement a Sand Management Plan for the coastal areas generally within the Oxnard Shores community. The accumulated sand moves from the vacant lots and access points to streets, sidewalks, walkways, and parking lots resulting in slippery and unsafe conditions for motorists and pedestrians. The project includes collecting wind-blown beach sand from beach access points, sidewalks, streets, and walkways and redepositing the sand back onto the beach at 13 locations. The sand would be redeposited and groomed over the entire sand placement area to a maximum depth of less than six inches above the existing elevation. The public access to these areas is consistent with the 2030 General Plan, Local Coastal Plan and the Oxnard City Code. Any projects requiring discretionary approval would be analyzed with the 2030 General, Local Coastal Plan and the Oxnard City Code for consistency and CEQA for any potential impacts. Therefore, the project will have no significant cumulative impact.

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

The proposed Coastal Development Permit to implement a Sand Management Plan for the coastal areas generally within the Oxnard Shores community. The accumulated sand moves from the vacant lots and access points to streets, sidewalks, walkways, and parking lots resulting in slippery and unsafe conditions for motorists and pedestrians. The project includes collecting wind-blown beach sand from beach access points, sidewalks, streets, and walkways and redepositing the sand back onto the beach at 13 locations. The sand would be redeposited and groomed over the entire sand placement area to a maximum depth of less than six inches above the existing elevation. The collection of sand from streets, walkways, and parking lots and redepositing them into the designated areas will not result in an unusual circumstance that would cause the project to have a

significant effect on the environment. The project will not alter the character of the surrounding area and the area of works does not contain any unusual environmental characteristics as the project does not include any new developments. Therefore, the project will not have a significant effect on the environment due to unusual circumstances.

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

The project is not located in or adjacent to a state designated scenic highway.

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

The proposed project site is not included on any list compiled pursuant to Section 65962.5 of the Government Code as confirmed by staff on October 1, 2024.

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

The project site is relatively flat and contains mostly developed/disturbed areas and sandy beach, such as existing public roads, parking lots, paved walking paths, and public beaches. The project only includes the intermittent removal and redepositing of sand. No permanent changes to the landscape of the area or structures are proposed. The project does not have the potential to impact any resources considered historical, or any existing or potential landmark, point of interest, or historic resource, and it is not located within an existing, proposed, or potential Historic District. Therefore, the proposed project will not cause a substantial adverse change in the significance of a historical resource.

NOW, THEREFORE, BE IT RESOLVED BY THE PLANNING COMMISSION OF THE CITY OF OXNARD:

SECTION 1. Based on the entire record before the Planning Commission and all written and oral evidence presented, including the Planning Commission staff report and all attachments thereto, the Planning Commission finds:

(1) **The proposed use is conditionally permitted within the subject coastal zones and conforms with all of the applicable provisions of this chapter.**

The proposed Sand Management Plan for managing windblown sand transport issues along public streets, parking lots, and access ways within the city is subject to the policies of the Coastal Land Use Plan. Due to consistent natural causes, such as wind, king tides, and severe storms, the City has determined the need for beach sand relocation and placement. The project will consist of sand removal activities from roadways, parking lots, sidewalks, pathways, trails, and public access points, and will redeposit sand in designated placement areas. Sand removal, sand placement, access routes, additional work areas for grooming and litter removal are included as part of the project. Pursuant to Section 17-57(B)(5) (Coastal Permit Procedures) of the Coastal Zoning Code, the proposed project is appealable to the California Coastal Commission, and is thus subject to the Planning Commission's approval of a Coastal Development Permit. The proposed project does not include the construction of any new buildings or structures. The implementation of a sand management plan is subject to the policies of the coastal zoning ordinance. While no new uses or developments are proposed the management plan is consistent with the intent of the Coastal Recreation (RC) coastal zone, which is the area in which most of the proposed work would be taking place. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. As conditioned, the Project is consistent with the Coastal Act policies and Local Coastal Plan policies that are applicable to the project..

(2) **The proposed use will not impair the integrity and character of the subject sub-zone.**

The proposed project does not include the construction of any new buildings or structures. The implementation of a sand management plan is subject to the policies of the coastal zoning ordinance. While no new uses or developments are proposed the management plan is consistent with the intent of the Coastal Recreation (RC) coastal zone, which is the area in which most of the proposed work would be taking place. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. As conditioned, the

Project is consistent with the Coastal Act policies and Local Coastal Plan policies that are applicable to the project. As outlined in the staff report, the Project also complies with the Coastal Act and Local Coastal Plan. As proposed and conditioned, the Project is not expected to negatively affect the integrity or character of the RC zone, adjacent zones, or immediate vicinity.

(3) **The location and intensity of use of the subject site would be physically suitable and would protect and maintain adjacent coastal resources.**

The Project site is generally surrounded by existing energy facilities and native vegetation. The Local Coastal Program planned for this lot to be developed with coastal energy facility uses. The lot is not adjacent to a beach public access way and the proposed removal of equipment will not further prevent beach access.

As discussed in the staff report, the proposed Project and use are consistent with Coastal Zoning Ordinance. While no new uses or developments are proposed the management plan is consistent with the intent of the Coastal Recreation (RC) coastal zone, which is the area in which most of the proposed work would be taking place. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. Therefore, the location and proposed intensity of the Project is suitable for the site and implementation would not significantly impact coastal resources.

(4) The proposed use would be compatible with the land uses presently on the subject site.

While no new uses or developments are proposed the management plan is consistent with the intent of the Coastal Recreation (RC) coastal zone, which is the area in which most of the proposed work would be taking place. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. No changes to the use of these areas are proposed.

(5) The proposed use would be compatible with existing and future land uses within the sub-zone and the general area in which the proposed use would be located.

No new uses or developments are proposed; the management plan is intended to clear existing public access areas. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas.

The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. The site will remain compatible with the surrounding open space and future land uses within the subzone and general area in which the proposed project would be located.

(6) **There are adequate public services for the proposed use, including, but not limited to fire and police protection, water, sanitation and public utilities and services to ensure that the proposed use will not be detrimental to public health and safety.**

No new uses or developments are proposed; the management plan is intended to clear existing public access areas. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. There will be no impact to public services.

(7) **The Proposed use will provide a type and level of public access consistent with the access policies and standards of the certified Oxnard Coastal Land Use Plan.**

Implementation of the proposed Project will not affect existing public access to the beach as the subject site is not located adjacent to a beach public access way, and the activities within the recreational areas will only improve beach access by ensuring access ways, parking areas, and streets used to access that area are cleared of sand. Therefore, present public access to the beach would remain unchanged and would be improved by this Project.

(8) **The proposed use will be appropriate in light of an established need, based upon the underlying goals and objectives of specific Oxnard Coastal Land Use Plan policies, applicable to the proposed location.**

No new uses or developments are proposed; the management plan is intended to clear existing public access areas. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. Therefore, the proposed use is appropriate in light of established need, based upon the goals and objectives in the LCP.

(9) **The proposed use would be consistent with all the applicable policies of the certified Oxnard Coastal Land Use Plan.**

No new uses or developments are proposed; the management plan is intended to clear existing public access areas. The RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. The implementation of this Sand Management plan would implement the intent of the RC zone by ensuring that public access is maintained via the coastal streets, pedestrian paths, and parking areas, to allow for the intended use of these areas. The Project would not adversely impact public access to the beach. As discussed in the staff report, the Project complies with the zoning standards and adheres to both General Plan and certified LCP policies.

SECTION 2. The Planning Commission, in accordance with the California Environmental Quality Act (CEQA), determines that the Project will not have a significant impact on the environment and is categorically exempt from CEQA pursuant to Article 19, Section 15304 (Class 4, Minor Alterations to Land) of the State of California Environmental Quality Act (CEQA) Guidelines, projects involving "minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes" may be found to be exempt from the requirements of CEQA. This proposed Project meets the requirements of a Class 4 Categorical Exemption because it consists of removal of relatively moderate quantities of sand from existing developed streets, walkways, parking lots, and beach access points within coastal adjacent areas, and redeposited on the beach. Equipment used in the movement of the sand to be deposited will remain above the high tide line and will not enter the water and the placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species. The equipment will use existing beach access points, currently used for other beach maintenance activities, so there is not a need for creation of new access points. A

Biological Resources Assessment report was prepared and found that there were no special status plants or wildlife species in the proposed areas of work. No new development or removal of native vegetation is proposed. Training shall be provided to all staff by a qualified biologist to ensure they are aware of the environment and follow all best practices. Based on review of the Biological Resources Assessment, no Exceptions to the Exemptions (Section 15300.2) apply to defeat the Exemption. Therefore, staff has determined that there is no substantial evidence that the project will have a significant effect on the environment and recommends that the Planning Commission direct the Planning & Environmental Services Manager to file the Notice of Exemption (Attachment C) with the Ventura County Clerk pursuant to Section 15062 of the State CEQA Guidelines within five (5) working days of passage, approval and adoption of the project.

SECTION 3. Based on the findings set forth herein, the Planning Commission hereby approves Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit), subject to the attached conditions of approval.

SECTION 4. The decision of the Planning Commission shall be final unless an appeal of the action is filed in accordance with the provisions of Section 17-58 of the Oxnard City Code.

SECTION 5. The Secretary shall certify the adoption of this Resolution.

STANDARD CONDITIONS OF APPROVAL FOR LAND USE PERMITS

Note: The abbreviations below identify the City department or division responsible for determining compliance with these standard conditions. The first department or division listed has responsibility for compliance at plan check, the second during inspection and the third at final inspection, prior to issuance of a certificate of occupancy, or at a later date, as specified in the condition. If more than one department or division is listed, the first will check the plans or inspect the project before the second confirms compliance with the condition. The italicized code at the end of each condition provides internal information on the source of each condition: Some are standard permit conditions (e.g. *G-1*) while some are taken from environmental documents (e.g. *MND-S2*).

DEPARTMENTS AND DIVISIONS

CA	City Attorney	PL	Planning Division
DS	Dev Services/Eng Dev/Inspectors	TR	Traffic Division
PD	Police Department	B	Building Plan Checker
SC	Source Control	FD	Fire Department
PK	Landscape Design	CE	Code Compliance

GENERAL PROJECT CONDITIONS

1. This permit is granted for the property described in the application on file with the Planning Division, and may not be transferred from one property to another. (PL, *G-1*).

2. By commencing any activity related to the Project or using any structure authorized by this permit, Applicant accepts all of the conditions and obligations imposed by this permit and waives any challenge to the validity of the conditions and obligations stated therein. (CA, *G-5*)

3. Applicants shall not permit any materials classified as flammable, combustible, radioactive, carcinogenic or otherwise potentially hazardous to human health to be handled, stored or used on the Project property, except as provided in a permit issued by the Fire Chief. (FD, *G-13*)

4. The subject Coastal Development Permit shall become effective after 10 working days have elapsed without appeal to the Coastal Commission following the proper receipt by the Coastal Commission's Executive Director of the notice of permit issuance pursuant to Section 13316 of the Coastal Commission Code of Regulations or after 21 calendar days following the final city action. Notice to the Coastal Commission shall be given by Planning Division staff as described by Sections 17-58 H through J of the Oxnard City Code. (PL, *G-17*)

PLANNING DIVISION SPECIAL CONDITION

5. This permit is granted for the Sand Management Plan approved October 17, 2024, on file with the Planning Division. The project shall conform to the plans, except as otherwise specified in these conditions. Minor updates to the plan may be made to address changes to development in the coastal areas and/or changes to the sand movement areas. Minor changes shall be reviewed and approved by the Community Development Department, Public Works Department, and Coastal Commission Staff.

6. All sand management activities shall occur only between the hours of 7:00am to 6:00 pm Monday through Saturday in accordance with Section 7-188(D) of the Oxnard City Code, unless it is determined by the Public Works Director, or Designee, that there is an emergency and which may have an imminent threat on life and/or property.

7. Heavy equipment shall remain above the high tide line and will not enter the water. The placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species.

8. Redeposited sand shall be groomed over the entire sand placement area to a maximum depth of less than six inches above the existing elevation.

9. Sand removal areas may be modified as needed to address changes to the sand movement. Redeposit areas shall be consistent with the approved Sand Management Plan, except as modified in consultation with the Community Development Department, Public Works Department, and Coastal Commission Staff.

10. During construction, Applicant shall control dust by the following activities:

    a. All trucks hauling graded or excavated material offsite shall be required to cover their loads as required by California Vehicle Code §23114, with special attention to Sections 23114(b)(F), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.

    b. All graded and excavated material, exposed soils areas, and active portions of the construction site, including unpaved onsite roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible. (MND, C-4)

11. Applicant shall comply with the following avoidance and minimization measures:

    a. Prior to initiation of all project activities (including staging and mobilization), all personnel associated with the project should attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to assist workers in recognizing special status biological resources with the potential to occur in the project site. This training will include information about California legless lizard, western snowy plover, California least tern, ESHA, as well as other special status species potentially occurring in the project site. This training shall be recorded for viewing by all new personnel involved in Sand Management Activities. A fact sheet conveying this information will also be prepared for distribution to all personnel involved with construction of the project. All personnel will sign a form provided by the trainer documenting they attended the WEAP and understand the information presented.

       The specifics of this program will include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the project site.

b. General Best Management Practices: The following general requirements shall be followed by all construction personnel:

   i. All food-related trash items such as wrappers, cans, bottles, and food scraps generated during proposed project should be disposed of in closed containers only and removed daily from the project site.
   ii. Sand placement will not occur below the highest high tide line and will avoid placement on wrack.
   iii. No deliberate feeding of wildlife should be allowed.
   iv. No pets should be allowed on the project site.
   v. No firearms should be allowed on the project site.
   vi. If vehicle or equipment maintenance is necessary, it should be performed in the designated staging areas at least 100 ft from ESHA.
   vii. During project activities, heavy equipment should be operated in accordance with standard Best Management Practices (BMPs). All equipment used on-site should be properly maintained to avoid leaks of oil, fuel, or residues. Provisions should be in place to remediate any accidental spills.
   viii. While encounters with special status species are not likely or anticipated, any personnel who inadvertently injure or kill a special status species or find one dead, injured, or entrapped should immediately report the incident to the City. The City should coordinate with a qualified biologist to determine species and if appropriate, the City should follow up with written notification to USFWS and/or CDFW within five working days of the incident.

c. To avoid disturbance to nesting and special status birds, including raptor species protected by the MBTA and CFGC 3503, activities related to the project including, but not limited to, the use of heavy equipment in beach areas and ground disturbance will occur outside of the bird breeding season for migratory birds (generally February 1 through August 31), as feasible. If the project activities must be conducted during the breeding season, then a pre-activity nesting bird survey will be conducted no more than seven days prior to the use of heavy equipment in beach areas or ground disturbing activities.

   If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) should be determined and demarcated by the biologist with bright orange construction fencing, flagging, or other means to mark the boundary. All project personnel should be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground-disturbing activities should occur inside this buffer until the avian biologist has confirmed breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer should occur only at the discretion of the qualified biologist.

d. When project equipment enters the beach or ESHA, the following should be followed by project personnel.

- Vehicles shall avoid operating in ESHA, with the exception of activities such as trash pick-up. Any trash pick-up within ESHA will be done by hand.
- Project activities will avoid ESHA, and vehicles should remain below a maximum 10 miles per hours speed limit and if western snowy plovers are encountered, the driver should back up at least 50 feet and/or alter their route to avoid flushing plovers.
- If active nests are observed, a refuge area should be created using symbolic fencing or another barrier deemed suitable. The fencing should be erected in a 300-ft diameter around the traditional center of the plover's roosting area and signage should be placed on the barrier.
- Any wrack encountered on the beach should be left in place.

e. During project activities, the project areas would be clearly delineated in the field to prevent direct impacts outside of designated areas and at minimum a 10-foot buffer will be maintained from any vegetated area or areas exhibiting dune morphology, as feasible.

f. Pre-construction Briefing: The Environmental Requirements document must be kept on site. The Environmental Requirements will be read to the construction personnel to ensure requirements and the following processes are understood by all construction personnel prior to starting work. If construction personnel finds any requirements within this document are infeasible given a safety or scope concern, construction personnel shall contact the qualified biologist to review the requirements and project implementation.

g. Spill Release/Prevention: Vehicles/equipment use on the beach must be inspected for leaks (e.g., fuel, oil, hydraulic fluids, etc.) and repaired prior to work. Fueling Shall not be conducted near a drainage feature. Spill kits/absorbent clean-up materials shall be available on-site and if used, disposed of properly. Contact 1-844-GOT-SPIL for any potential hazardous material or spills that cannot be cleaned up by spill kits alone.

[signatures on following page]

PASSED, APPROVED, AND ADOPTED by the Planning Commission of the City of Oxnard on this 7th day of October 2021.

_____

Ronald Arruejo, Chair

I hereby certify that the foregoing is a true copy of a Resolution adopted by the Planning Commission of the City of Oxnard at a meeting held this 17th day of October 2024, and carried by the following vote:

AYES: Commissioner(s):

NOES: Commissioner(s):

ABSENT: Commissioner(s):

ABSTAIN: Commissioner(s):

RECUSED: Commissioner(s):

_____

Joe Pearson II, AICP, Secretary

Oxnard Sand Management Plan

Planning & Zoning Permit No. 22-400-06
(Coastal Development Permit)

Applicant: Brian Yanez, Assistant Public Works Director on behalf of the City of Oxnard

Joe Pearson II, Planning and Environmental Services Manager

Planning Commission
October 17, 2024

CITY OF OXNARD CALIFORNIA

Project Request

- A Coastal Development Permit to implement a Sand Management Plan:

  - Collection of wind-blown beach sand from beach access points, sidewalks, streets, and walkways and redepositing the sand back onto the beach at 13 locations.

  - The sand would be redeposited and groomed over the entire sand placement area to a maximum depth of less than six inches above the existing elevation

Background

- The City Public Works Department (PW) has historically removed wind-blown sand from streets, sidewalks, walkways, and parking lots and trucked to an off-site landfill. The amount of sand removed from public areas varies from season to season due to natural causes, such as wind, king tides and severe storms.
- In the first quarter of 2022 (January through March), the City tracked the amount of sand removed from streets, sidewalks, walkways, parking lots, and access points and the total sand removed. Based on that tracking it is estimated that the City is removing between 3,000 and 5,000 cubic yards.

Location Map



Project Area Photos



Photograph 1. View of sand removal area at corner of West 5th Street and Mandalay Road in Area One.



Photograph 2. View of sand placement area at corner of West 5th Street and Mandalay Road in Area One.



Photograph 3. View of access and sand removal area west of Reef Way in Area One.



Photograph 4. View of sand source site west of Seabreeze Way in Area One.



Photograph 5. View of access and sand removal area along Capri Way in Area Two.



Photograph 6. View of sand placement area west of Neptune Square in Area Two.

Project Area Photos



Photograph 7. View of work area at Neptune Square in Area Two.



Photograph 8. View of access and sand removal area at end of Marine Way in Area Three.



Photograph 9. View of sand placement area in Area Three.



Photograph 10. View of access point at Oxnard Beach Park in Area Three.



Photograph 11. View of access and sand removal area along ADA paths in Oxnard Beach Park in Area Three.



Photograph 12. View of access and sand removal area along ADA paths in Oxnard Beach Park in Area Three.

Project Area Photos



Photograph 13. View of sand removal area in Oxnard Shore parking lot in Area Four.



Photograph 14. View of sand removal area in Oxnard Shore parking lot in Area Four.



Photograph 15. View of access and sand removal area along ADA paths in Area Four.



Photograph 16. View of sand placement area in Area Four.

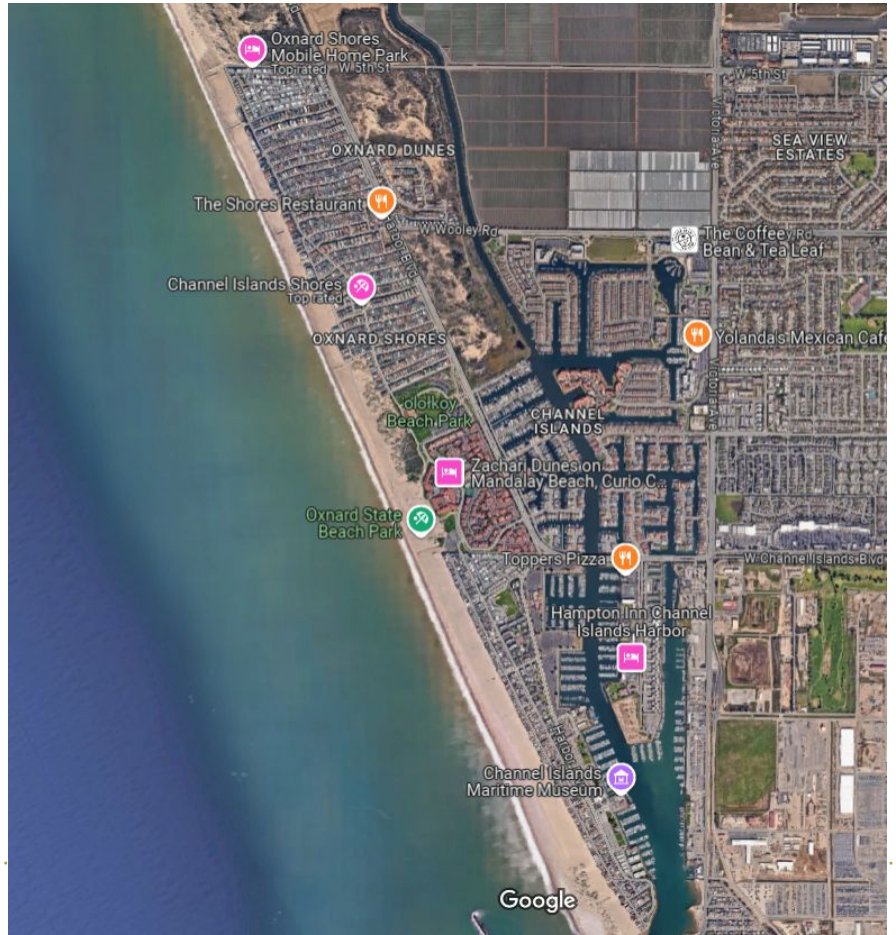


Photograph 17. View of sand removal area at Channel View parking lot in Area Five.



Photograph 18. View of BEACHTECH 3000 beach cleaner.

Surrounding Uses



Sand Management Plan Summary

- The City is proposing a Sand Management Plan for managing windblown sand transport issues along public streets, parking lots, and access ways within the city.
- Sand removal, sand placement, access routes, additional work areas for grooming and litter removal are included as part of the project.
- Once the sand is removed from the street or public beach access points, the sand will then be redeposited back onto the beach at up to 13 locations.
- Access to the sand placement areas may include up to 14 separate access points to gain access onto the beach and an additional three locations at 'ololkoy (Oxnard) Beach Park for access only to provide trash service.

Project Area 1



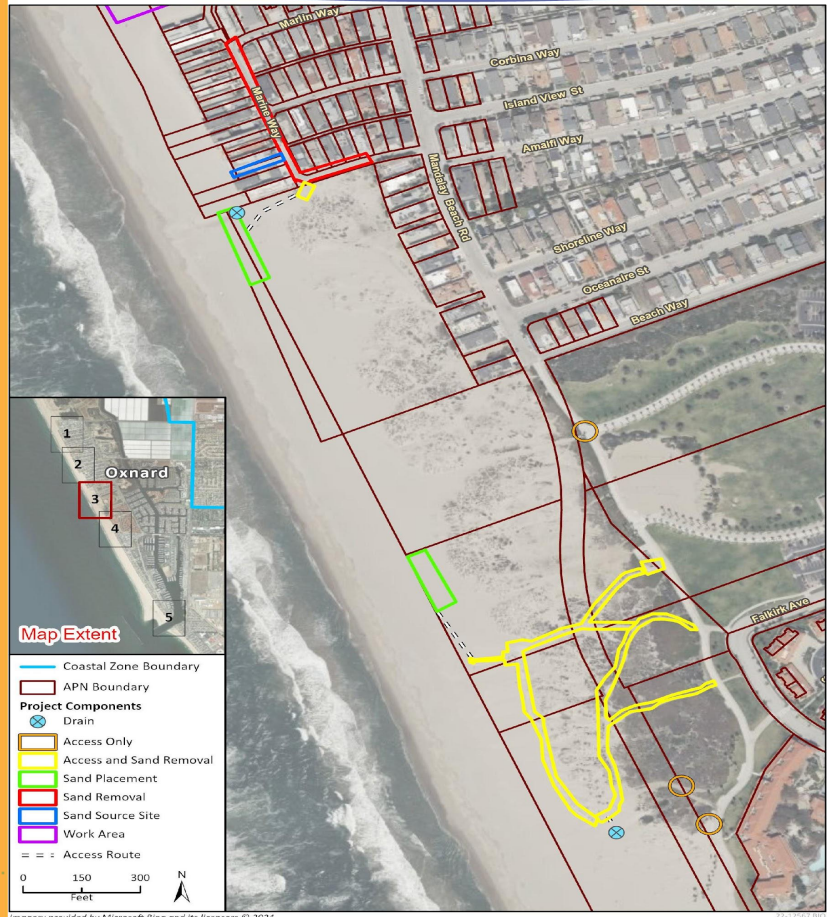
<u>West 5th Street to Seabreeze Way</u> - The most northern segment of the project includes the main public streets of West 5th Street and Mandalay Beach Road; a large undeveloped section of sandy beach adjacent to Mandalay Beach Road; six sand placement areas west of four access points; and two undeveloped private lots (sand sources sites).

Project Area 2



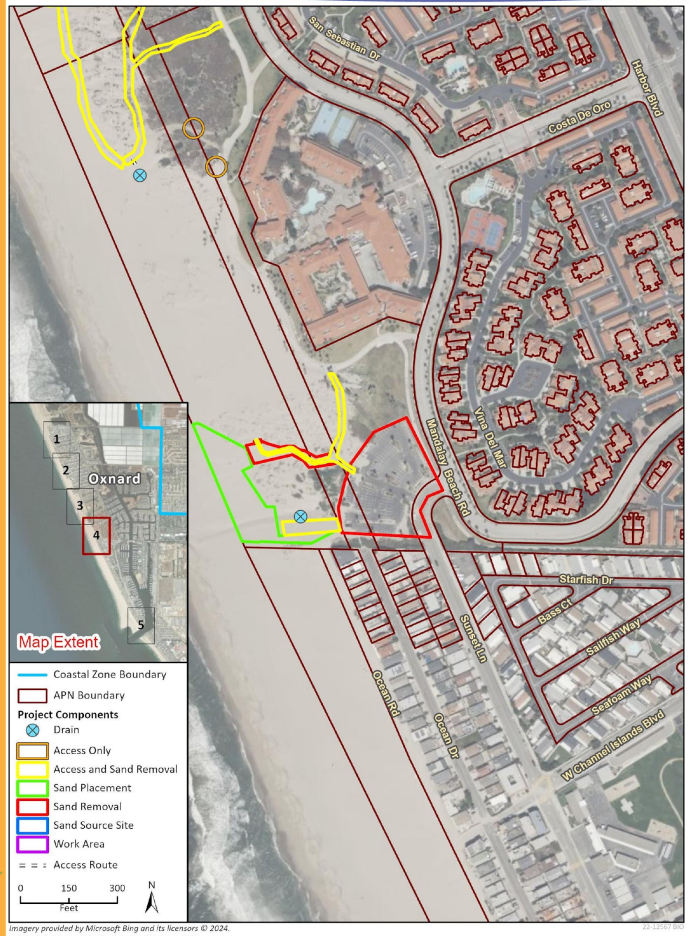
<u>Seabreeze Way to Neptune Square</u> - Area Two consists of Mandalay Beach Road south of Seabreeze way and includes Capri Way where the street dead ends at Neptune Square. This area includes four sand placement areas west of four access points, and one placement area west of two access points associated with Neptune Square. Two sand source sites are in this area adjacent to Capri way.

Project Area 3



Neptune Square to 'ololkoy (Oxnard) Beach Park - Area Three is south of Neptune Square to Oxnard Beach Park. This area consists of Marine Way, two sand placement areas, one sand source site, two access points, and three access points for trash service only associated with Oxnard Beach Park.

Project Area 4



'ołołkoy (Oxnard) Beach Park to Oxnard Shores - Area Four consists of Oxnard Shores parking lot, ADA paths, one sand placement area, and two access points. Sand removal will occur in the Oxnard Shores parking lot, along the ADA paths , and at an access point to the beach. The sand will be redeposited at a sand placement area adjacent to the ADA paths. Sand accumulates along the ADA paths on a frequent basis and proactive sweeping is proposed in this area to limit the extreme buildup of sand on the pathways limiting public access to the beach. Approximately 300 to 500 cubic yards of sand will be redeposited in these areas.

Project Area 5



La Granada to Channel Islands Harbor - The most southern area includes the parking lot adjacent to Channel Islands Harbor entrance. Sand accumulated in the parking lot and sidewalks will be redeposited at the sand placement area at the corner of West 5th Street and Mandalay Beach Road.

Consistency with Standards

- The project is consistent with all applicable standards:
  - General Plan
  - Local Coastal Program
  - Coastal Zoning Ordinance

Community Input

- The Project site is generally located within the Oxnard Shores Neighborhood. On October 17, 2022, the Project was presented to the public during the City's Community Workshop meeting. Notices were mailed out to property owners. Approximately 2,000 meeting notices were mailed by the city, and the Project area was posted in two locations with Project details and Community Workshop information.

- Onsite posting, Newspaper Ad, and Public notices sent for the Planning Commission hearing.

Environmental Review

Exempt for California Environmental Quality Act (CEQA):

1. Section 15304, “Minor Alterations to Land”;
2. Project consists of removal of relatively moderate quantities of sand from existing developed streets, walkways, parking lots, and beach access points within coastal adjacent areas, and redeposited on the beach;
3. Equipment used in the movement of the sand to be deposited will remain above the high tide line and will not enter the water and the placement of sand will avoid disturbing beach wrack and avoid impacts to dune habitat and roosting, foraging, and nesting sensitive species;
4. A Biological Resources Assessment report was prepared and found that there were no special status plants or wildlife species in the proposed areas of work. No new development or removal of native vegetation is proposed;
5. As proposed Project will not have significant environmental impacts;
6. No Exceptions to the Exemption apply.

Recommendation

That the Planning Commission:

a) Find the Project to be Categorically Exempt from environmental review pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15304 (Class 4, Minor Alterations to Land); and

b) Adopt Resolution 2024-XX approving Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit), subject to certain findings and conditions.

CITY OF
OXNARD
CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit)

Lorin Fife <lorinfife@gmail.com> Thu, Oct 17, 2024 at 12:12 PM
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, alexander.nguyen@oxnard.org, Michael Wolfe <michael.wolfe@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <Joe.Pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen Kulik <gkulik@kgswlaw.com>

VIA EMAIL
City of Oxnard Planning Commission
planning@oxnard.org

Re: Public Hearing, Thursday, October 17, 2024 re Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit): Comments and Objections on behalf of The Colony at Mandalay Beach Owners Association, representing 440 residences adjoining Areas 3 and 4 of the proposed Sand Management Plan

Dear Mayor Zaragoza, Councilmember Perello, City Manager Nguyen, Public Works Director Wolfe, Assistant Public Works Director Yanez, Project Planner Pearson and members of the Planning Commission,

I serve as President of The Colony at Mandalay Beach Owners Association ("the Colony"), representing 440 residences immediately adjacent to areas targeted in this proposed sand management plan (the "Proposal"). One of my fellow Colony homeowners and an important member of our Colony residents committee reviewing this Proposal, Fran Pavley, represented this area in the state Senate and Assembly and served with distinction on the California Coastal Commission for many years. Ms. Pavley and I worked together with other Colony residents reviewing and preparing comments on the Proposal.

Mr. Yanez, please reconfirm I am on the list of public speakers scheduled to testify regarding this matter before the Planning Commission at that hearing this evening.

The views I am expressing here reflect not only the views of hundreds of residents of the Colony, but also the views of thousands of other residents of the Oxnard Shores area affected by the Proposal and tens of thousands of visitors to the area, whose visits have been negatively affected by the City's mismanagement of our beach areas, one of our City's most valuable natural resources, particularly in Area Four of the Proposal.

Our Objections: Many of the Colony's residents, including the undersigned, reside within survey areas identified in this Proposal. We are directly impacted by this Proposal and we cannot overstate our opposition to its adoption by the City of Oxnard. The Coastal Development Permit should not be granted and the Proposal should not be adopted by the Planning Commission or the City Council or considered by the Coastal Commission unless and until the deficiencies identified herein are addressed and rectified.

Our family has lived in this neighborhood for almost 40 years, and I am intimately familiar with the history of the areas near the Colony affected by the Proposal. Please accept these comments and objections on behalf of the owners and residents of the Colony in the constructive manner in which they are intended, include them in the official record of objections to the proposed sand management plan, and make sure that they are reviewed by all members of the City's Planning Commission before the public hearing this evening.

If the Planning Commission fails to accede to our suggestions, please provide the undersigned, our General Manager Garett Guenot and our outside counsel Glen Kulik with sufficient advance notice to register our complaints with the City Council and with the Coastal Commission. In addition to the issues identified in this correspondence, the residents and owners of the Colony, our counsel and I reserve our right in subsequent proceedings to raise objections to this Proposal not identified in this email or during my oral testimony.

In proceedings within the jurisdiction of the California Coastal Commission such as this hearing, it is a long established principle that neighbors play a crucial role by giving voice to their concerns and by reserving the right to appeal projects that might significantly impact their property or the surrounding coastal environment, acting as a check on proposals that could negatively affect their community and providing input on potential impacts to the local coastal landscape. We embrace that philosophy and, as neighbors of the areas affected by the Proposal, appreciate the opportunity to provide the feedback contained herein.

Before getting to our objections, we were gratified that the City eliminated its earlier proposal to install sand fences in the Oxnard State Beach area, which over time would have been overwhelmed by sand, creating a public safety hazard, a maintenance nightmare for the City and an eyesore for the beach-going public. Thank you for responding to that objection and several other more minor objections we submitted in response to the earlier draft sand management plan circulated for comment two years ago. However, there were many significant issues we raised two years ago that the City still has failed to address.

The residents of the Colony, as we have repeatedly communicated to the City in a variety of contexts, are anxious to work with the City on this important project. We will live with its results and are delighted that the City has initiated this sand management plan. We understand that this plan, when complete, will serve as a precursor for a very badly needed dune restoration plan for our community. However, over the course of the two years since the first draft of this Proposal met significant opposition from the community, including issues raised in writing and in oral testimony by the Colony, the City failed to even once reach out to representatives of the Colony to discuss revisions to the Proposal that might have addressed the Colony's concerns.

Our objections to the current Proposal are both procedural and substantive.

Lack of Adequate Notice and Due Process: From a procedural perspective, the City has worked on this revised plan since October 17, 2022 — almost two years — and finally published a document for public review and comment on October 10, 2024 late in the afternoon. After receiving extensive comments from the public and taking two full years to create a new 540-page package with extensive references to external documents and external sources for affected parties to review, the City provided affected parties like the residents of the Colony with less than a week to provide comments. That would be ridiculously aggressive on its face, but that week also happens to include the Indigenous Peoples/Columbus Day holiday as well as Yom Kippur and two other major Jewish holidays, which are celebrated and observed by many residents of the Oxnard Shores community potentially affected by this Proposal, including the undersigned. No average resident of the community could reasonably be expected to review all these materials in even a normal week.

To add insult to injury, the Planning Commission scheduled its hearing on this proposal for one of those Jewish holidays. As a result, I cannot personally attend the hearing in person, and many neighbors cannot participate in the hearing at all. This failure to provide adequate notice and the decision to schedule the public hearing on a Jewish holiday are both insensitive and deprive all affected parties of due process. The City should provide at least until December 1, 2024 if not longer for interested parties to complete their review and to comment on this complex Proposal.

There are No "Environmentally Sensitive Habitat Areas" in Area Four, only Sand Piles Recklessly Manufactured by the City: Our most important substantive concern relates to the fact that, on pages 39 and 40 of 540 of the proposed sand management plan and elsewhere throughout the Proposal, the artificial, City-manufactured sand piles south of the hotel currently known as the Zachari Dunes at Mandalay Beach (the "Hotel") in Area Four are mislabeled in the Proposal as "environmentally sensitive habitat areas," a label which is false, misleading and prejudicial.

Referring to these areas as "environmentally sensitive habitat areas" also serves to obfuscate the City's mismanagement and direct role in manufacturing these sand piles and then calling them environmentally sensitive "sand dunes" and "endangered species habitat areas." As noted multiple times in the Proposal, no endangered plant or wildlife species has ever nested, resided or been observed in Area Four. All references relating to "environmentally sensitive habitat areas," at least in Area Four, should be deleted from the Proposal

Please also remove all references to natural dune topography where it relates to these areas in Area Four — there is nothing "natural" about them — and please do not identify these areas as environmentally sensitive habitat areas, as endangered species habitats or as sand dunes in future drafts of this proposed sand management plan.

As we have communicated before to City officials, those artificial sand piles were built up by City employees utilizing bulldozers — on flat beach areas that had been accessible to the public — and by City employees planting non-native, invasive and in some cases poisonous plant species expressly prohibited by the Coastal Commission (e.g., South African iceplant and myoporum, which is native to New Zealand) and introducing artificial irrigation, hay bales, sand bags and other measures to further heighten the sand piles. Those plantings were made in clear and reckless violation of the directive the City received from state authorities back in the 1980s (the "Letter") to "restore" any previously existing sand dunes that were destroyed during the construction of the Colony and the hotel. See Attachment 1.

As you will see from this Letter, the Coastal Conservancy suggested that the City should "restore" any dunes that were destroyed during the development of the Colony and the Hotel, which occurred between 1983 and 1985. Since there weren't any dunes to begin with between the extreme northern and southern sections of Area Four, there were no sand dunes lost or leveled during development of the area and, therefore, no sand dunes to restore. We have the City's own "general plan" map from that period, which I have also attached as Attachment 2. This topographical map shows no dunes between the south end of the Oxnard Shores parking lot (the "Parking Lot") south of the Hotel and the Rehab Point area north of the Hotel. The dunes shown in this map still exist and were never impacted by the development.

In its 1982 Letter, the Coastal Conservancy did suggest a logical course of action had any dunes existed in Area Four that the developers might have actually leveled during the development process: (1) a large scale "topo" (presumably a topographical map), (2) detailed soil analyses to enable the City to determine how the soil needed to be modified "to support native dune plants," (3) a topographic survey of the dunes in "a large enough scale to determine how the soil must be modified to support native dune plants," (4) an "inventory of plant species in both the dune area and the area to be restored," (5) a "grading plan," which "should detail how dunes will be constructed, especially their shape and orientation," and a "planting plan," which "should detail the species to be used, their time of planting, any pre-soil treatments needed… and any post-planting treatments needed, such as irrigation" with "detailed discussions on methods to be used and timetables."

If the City took any of these steps in anticipation of the development of Maintenance Assessment District 4 ("MAD-4"), we have not found any evidence of them. We asked the City Manager, Mr. Nguyen, three years ago in writing if he could help to track these materials down, because they would be incredibly helpful to our efforts to understand how we arrived at the current situation. He did not respond to our request. Therefore,

our view at this point based on the materials we have located, including through multiple formal public records requests, is that the City's charge from the Coastal Commission was limited to restoring any dunes destroyed by the developers during the development process of the Hotel and the Colony and no more than that.

Instead, for reasons unclear to our committee and our neighbors, the City decided to artificially manufacture gigantic sand piles utilizing non-native, invasive and poisonous plants, hay bales, sand bags, irrigation systems and heavy equipment. These sand piles now bury pedestrian walkways, park benches and even the City's own irrigation equipment, block handicapped and emergency vehicle beach access, make bike paths and fire lanes impassable, devour beautiful greenbelts and park areas creating trip and fall hazards where sand has raised the surfaces, and fill up the public parking lots, while providing cover for illegal drug users and individuals shooting off illegal fireworks. They also serve as an elevated launching pad, allowing the windblown sand to reach further inland and into streets from which it can no longer be returned to the beach.

As noted above, while we have also attempted to investigate this issue with public records requests to the City, and have retrieved many documents, we have not received any documents that shed additional light on communications between the Coastal Commission or other state agencies and the City regarding Area Four or MAD-4 or the City's reckless creation of the area's sand piles. If you locate any additional relevant correspondence, plans, memoranda or other materials, we would appreciate seeing them.

If anyone doubts the City's culpability in creating this problem, we would be happy to provide that person with extensive photography of Oxnard City employees on what was then a flat beach setting up haybales to catch windblown sand, planting prohibited non-native, invasive plant species, including iceplant and myoporum, and setting up irrigation systems to encourage the growth of the sand piles. I have provided a few samples of these photographs in Attachments 4 through 9.

The only sand dunes existing in Area Four prior to the construction of the Colony and the Hotel were (i) at the extreme southern end of the Parking Lot south of the Hotel, identified in the proposal as the Oxnard Shores parking lot, and (ii) north of the Hotel between 'ololkoy Beach Park (formerly known as Oxnard Beach Park, the "Park") and the shoreline. There were no sand dunes between those two areas, and no sand dunes were destroyed or in need of restoration following the development of the Colony and the Hotel. The City's own topographical map prepared at the time documents that the areas now incorrectly labeled as "environmentally sensitive habitat areas" were flat empty beach before reckless and misguided City actions created the current sand piles. See Attachments 2 and 3.

Having personally lived adjacent to those areas for the last 27 years alongside family members and neighbors who have lived here for almost 40 years, I can assure you with the support of extensive photographic evidence collected from residents of the Colony that those areas have never been "environmentally sensitive habitat areas." What those sand piles do create is a nuisance so that virtually every afternoon, sand blown off the sand piles will continue to cover the walkways in our area, preventing access to the beach and creating ADA violations and dangerous situations on an almost daily basis. They also block bike paths and create obstacles to beach access for emergency vehicles. The Proposal in its current form will not address these problems.

The challenges created by the massive sand piles in Area Four between the Hotel and the southern edge of the Parking Lot have also been aggravated by the Hotel and residents of Hollywood Beach moving sand from adjacent beach areas and walkways onto the sand piles in Area Four, and by the City's movement of sand from ADA pathways and the bike path onto the sand piles, as well. A simple view today of recent aerial photography shows entirely flat beaches between the Hotel and the shoreline and Hollywood Beach residences and the shoreline. See Attachment 10. Those beaches remain flat, because the Hotel and residents of Hollywood Beach routinely over the years have either bulldozed excess sand back out towards the shoreline or into the sand piles the City created in Area Four.

We note that page 27 of 540 in the fourth paragraph of the Proposal also calls the sand piles in Area Four and the overgrown sand dune network in Area Three "environmentally sensitive habitat areas." It also quotes the Coastal Act definition of such areas as "Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." At least with respect to Area Four, there are no such areas. The City should not identify locations as "environmentally sensitive habitat areas" ("ESHAs") that contain no plant or animal life or their habitats that is either rare or especially valuable. Wishing that these areas might be ESHAs or that they might someday become ESHAs does not make them ESHAs.

We object to such mislabeling throughout the Proposal, including without limitation in the discussion starting at page 76 of 540. As noted at the outset of the discussion of "Special Status Animal Species" that begins on that page, the Proposal notes that "No special status animal species were observed during the field reconnaissance survey." At least with respect to Area Four, that is because such species, including without limitation the California Legless Lizard, the Western Snowy Plover and California Least Tern, have never roosted, nested, foraged or otherwise visited there. Remote possibilities or bureaucratic fantasies should not result in areas being mislabeled as environmentally sensitive habitat areas.

The City Should Not Rely on Definitions from Documents It Has Not Adopted: In the discussion regarding sensitive habitat areas starting at page 77 of 540, the Proposal discusses areas identified as coastal scrub in the City's "Draft Coastal Land Use Plan (City of Oxnard 2017 [draft])." We also object to any reliance in the Proposal on any materials or definitions contained in a document of any kind that has not been formally adopted by the City, including without limitation any Draft Coastal Land Use Plan. See also, e.g., pages 81 of 540, et seq.

The City's Misguided Manufacture of the Sand Piles Has Also Destroyed Public Park Greenbelt and Public Views of the Coast: Because of the City's reckless failure to maintain Area Four for many years now, the sand piles have also migrated into a large greenbelt area that used to be utilized by the general public as a park with beautiful public views of the shoreline and Channel Islands National Park beyond. See the area on Attachment 2 above the title "Central Walk." See also Oxnard City Council Resolution 8586, dated November 22, 1983, attached as Attachment 3. The City's actions in this context fall far short of its aspirations, as spelled out in the City's own 2030 General Plan, particularly Policy ICS-9.1, which focuses on accommodating and providing access for visitors to the coastal area, Policy ER-1.1, concerning protecting Oxnard's natural resources, scenic areas, parks and open spaces, Policy ER-2.3, promoting areas suited for open space and recreational uses, and Policy ER-8.3 requiring City staff to work with property owners to manage beach sand distribution and quality while remaining sensitive to animal and plant sand habitats.

Today, despite the mandate of the City's own Resolution 8586 and its own 2030 General Plan, that public greenbelt park area has become unsafe, filled with trip and fall hazards, and virtually unusable. Due to the City's mismanagement, the public views from that park area of what used to be a magnificent coastal vista have been blocked by the City-manufactured sand piles in violation of the spirit of the City's own resolution.

The City has allowed this invaluable greenbelt public park to become anything but green. Until the sand piles are removed and effective measures to control the blown sand are implemented, this situation will continue no matter what else the City does in our area. Rather than pretending that these sand piles are environmentally sensitive, the City should return this area back to its natural flat state, restore public access and views, provide for removal of the sand piles and either redeposit the excess sand back to the relocation areas identified in an amended plan or sell it to neighboring communities dealing with shoreline erosion like Malibu's Broad Beach or neighboring Port Hueneme. Selling the excess sand from Oxnard State Beach could generate significant revenues and eventually turn into a "cash cow" for the City, which always seems to be in desperate need of revenues to fund critical operatons. See, e.g., https://coastalcare.org/2017/10/broad-beach-sand-project-costs-jump-to-55-60-million-per-decade-malibu-california/

Portions of Areas Three and Four are Mislabeled as Dune Mat: Maps of Areas Three and Four throughout the Proposal also contain areas labeled as "Dune Mat," which is defined in the report on page 72 of 540. To the best of our knowledge and belief, none of the plants identified in that category exist in Areas Three or Four. If they have recently migrated into those areas, which we do not believe to be true, they will soon be choked out by the non-native City-installed iceplant. All such references to "dune mat" in the diagrams and maps scattered throughout the Proposal relating to Areas 3 and 4 should be similarly corrected, including without limitation pages 40, 61 and 132 of 540.

Changes in Excess Sand Relocation Areas are Misguided and Will Be an Exercise in Futility: We also object to the revision in the sand management plan that now calls for excess sand to be relocated to Area Four west of the sand piles. See, e.g., page 3 of 540, Figure 5 on page 40 of 540 and Photograph 16 on page 44 of 540, as well as the description of Project Area 4 on page 329 of 540. We strongly urge the City to reconsider its decision to locate sand placement sites "on the beach west of each removal area." See page 51 of 540. There is already a surplus of sand in Area Four as evidenced by the City-manufactured sand piles and the massive amounts of excess sand routinely occupying a significant percentage of the Parking Lot. See Photographs 13, 14 and 15 on page 44 of 540.

Previously, the City had informed the Colony that any excess sand would be transported to beach areas needing sand in Area One or Area Five. The City should return to that plan or sell the excess sand to nearby communities suffering shoreline erosion like Port Hueneme or Malibu who are willing to pay for this precious commodity that Oxnard State Beach has in abundance. See, e.g., https://www.malibucity.org/DocumentCenter/View/1223/Project-Description?bidId=

Redepositing excess sand "at a sand placement area adjacent to the ADA paths," see page 329 of 540 re Project Area 4, is also an exercise in futility and an absolute guarantee that the "ADA paths" will be covered with sand by the following day, preventing access to the beaches for our mobility challenged residents, including many residents of the Colony, visitors to the Hotel and members of the general public attempting to visit the beach and enjoy what once were spectacular views from public park areas. It also guarantees that it will be difficult for emergency vehicles to access the beach areas and for bicyclists to use the bike paths safely.

The futility of this approach is illustrated by the City's own imagery, see Photograph 12 on page 107 of 540, which is labeled as "View of work area and sand placement site west of Oxnard Shores parking lot." In reality, that photo shows a concrete ADA path and beach access point covered with drifted sand from the adjacent sand piles covered with City-planted non-native, invasive iceplant. Any sand deposited directly west of this area will blow right back into it within hours on an average day. What is also clear from this photo is the magnificent view of the shoreline, Santa Barbara Channel and Santa Cruz Island beyond. This beautiful public view used to be available to picnickers in the nearby public greenbelt park. Those public views should be restored as part of the City's sand management plan.

There is No "Potentially Jurisdictional Coastal Wetland" in Areas Three or Four: In addition, we object to the characterization of the area near the drain north of the Hotel as "an unnamed potentially jurisdictional coastal wetland" associated with a "soft rush marsh vegetation community." See Figure 4 on page 39 of 540 and in Figure 5 on page 40 of 540. See also pages 71 and 73 of 540. This isolated area displays none of the characteristics typically associated with a soft rush marsh. While we have not had time to inspect this area, periodic leakage issues with the adjacent drainage system, similar to a broken cesspool or sewer line, have probably created this small bog. This area would almost undoubtedly dry up if the City properly maintained the drainage system, which has also backed up and affected residents of the Colony from time to time. It should not be characterized as a "potentially jurisdictional coastal wetland" in the sand management plan.

The City Planted the "Myoporum Groves," Should Acknowledge that Role and Remove Them as Part of this Plan: We also object to the omission from the Proposal of the City's role in planting the "Myoporum Groves" referenced on page 73 of 540. For the specific location of these non-native, invasive plants prohibited by the Coastal Commission, see Figure 5 on page 40 of 540. They did not just magically appear adjacent to Oxnard State Beach. The City planted these incredibly invasive plants in connection with its early efforts to build the sand piles and screen the Parking Lot from windblown sand. In addition to being non-native, invasive and in some instances poisonous plants, they are massively overgrown, provide difficult-for-authorities-to-access areas for intravenous and other drug users and visitors shooting off illegal and dangerous fireworks, and represent a horrible accident just waiting to happen. Along with the other non-native, invasive species like the City-planted iceplant, which has taken over most of the remaining areas in Area Four, the myoporum should be removed and eradicated from the beach areas at the outset of any responsible sand management plan.

The City Should Eliminate Overlapping Areas from the Proposal: We also strongly urge the City to eliminate overlapping Areas from the sand management plan. For example, in the current Proposal, the area immediately adjacent to the northern border of the Colony and the Hotel appears in both Area Three and Area Four. See pages 39 and 40 of 540 in the Proposal. For a variety of reasons, including without limitation simple clarity, effective management and public understanding, we urge the City to create clear boundaries between the different Areas included in the finalized sand management plan and revise the figures set forth in the sand management plan accordingly. We believe that the descriptions of Areas Three and Four on page 22 of 540 might help to clarify the boundaries between the two Areas, but fails to do so currently. We also note that that description of Area Three does not appear to contemplate any sand removal from the areas north of the Hotel near the Park, which makes no sense. That description of Area Four also seems to include the Park. Alll of this will be confusing and difficult to manage. We object to the confusion this ambiguity creates in the Proposal.

The City Should Use the Chumash Name the City Gave to the Park: We also note that in more than one location on page 22 of 540 and throughout the Proposal (see, e.g., pages 50 and 51 of 540 in the Project Description and page 106 of 540 in a photo caption), the City refers to the Park as "Oxnard Beach Park." Since the City chose to give the Park a Chumash name, we suggest the City utilize the correct name in its own documents.

At Least One Typo: Also, on page 22 of 540, in the second paragraph relating to Area Four, there is a reference to "the Oxnard Shores parking log." While that area is frequently covered with debris and will be until the sand piles are removed, we suspect that the City actually meant "the Oxnard Shores parking lot."

Failure to Identify All Relevant Issues: We note that on page 50 of 540, the City states that "Wind and storm events generally deposit sand in public parking lots, walking paths and streets." On page 1 of 540, the City observes that "The coastal areas in the city of Oxnard experience severe wind events that result in wind-

blown sand accumulating on vacant private lots and public beach access points…. The accumulated sand moves from the vacant lots and access points to streets, sidewalks, walkways, and parking lots resulting in slippery and unsafe conditions for motorists and pedestrians." While we agree with these findings, they are incomplete. They should also acknowledge that the wind-blown sand also accumulates on the City's artificial sand piles in Area Four, exacerbating the problems presented by those sand piles. The sand also accumulates on public bike paths, making them dangerous to bicyclists. In addition, the sand constantly accumulating on public beach access points not only makes the ADA paths in Areas Three and Four slippery and unsafe, but makes the beach totally inaccessible for individuals with mobility issues in violation of ADA. The condition also complicates access to beach areas by emergency vehicles and personnel.

Conforming Changes: To the extent there are changes made to maps set forth in the Proposal (e.g. changed Sand Placement locations), conforming changes will need to be made to Figure 1 on pages 36, 53 and 80 of 540, and presumably other locations in the finalized sand management plan, as well. To the extent sand placement areas are moved to more appropriate locations, Table 1, Project Area Estimates at pages 64 through 66 of 540, and presumably other elements of the Proposal will need to be conformed.

The City Should Not Mislabel Areas as Endangered Species Habitat, If Such Species Have Never Been Found in the Area: Figure 7 on page 80 of 540 is blurred beyond recognition. In an earlier draft of the sand management plan, this Figure 7 identified virtually the entire beach from the entrance to Channel Islands Harbor to north of Fifth Street as "Western Snowy Plover" critical habitat. To the best of our knowledge and belief, as confirmed on page 78 of 540 of the Proposal, this is inaccurate. We are not aware of any Western Snowy Plover ever nesting or foraging north of the area of Hollywood Beach that lies south of La Brea Street. All of their nesting sites with which we are familiar are just north and west of Area Five. No California Legless Lizard, Western Snowy Plover or California Least Tern has ever appeared, nested or foraged in Areas Three or Four to the best of my knowledge and belief. They were not observed during the field survey, and nobody to the best of my knowledge and belief has ever observed any of them in Areas Three or Four. The Proposal should be corrected and all of these speculative references based on fantasy or conjecture should be deleted from the Proposal.

Photographs Should Be Appropriately Captioned: Photograph 10 on page 106 of 540 characterizes the image as "potential coastal wetland west of access and sand removal site within Oxnard Beach Park." We respectfully object and disagree that this area, which routinely needs to have sand removed to keep the pipe there functional and operational, should be categorized as "potential coastal wetland." We ask that this photograph and its caption be removed from the proposed sand management plan.

Similarly, Photograph 11 on page 107 of 540 shows ADA paths in Area Four completely buried by sand blowing off the adjacent City-manufactured sand piles and areas of the greenbelt public park that have also been buried by drifting sand from those sand piles. Simply calling this photo an access and sand removal site is not adequate. The tangle of non-native, invasive myoporum in the background should also be identified in the caption.

In addition, Photograph 13 on page 107 of 540 illustrates how quickly the sand migrates from the beach onto developed areas. For a reader unfamiliar with the area, the photo simply looks like beach area. In reality, the areas in the foreground are covered parking spots that have vanished under sand blown off the City-manufactured sand piles in the right of the photograph, which trail off of the adjacent myoporum "grove." This is and will be a perpetual problem, so long as the City fails to eliminate the root cause of the problem, its City-manufactured artificial sand piles and City-planted non-native, invasive vegetation.

Mysterious Omissions from the Scenic Roadways Map: We also note on Figure 3 on page 374 of 540 that Harbor Boulevard paralleling the coast and Channel Islands Boulevard as it passes through and along Channel Islands Marina are not identified on the Oxnard "Scenic Highways and Roadways Map." These

seemed like curious omissions of important thoroughfares serving Oxnard's beach and marina communities and we were curious why the City chose not to feature them.

Reservation of Rights re MAD-4 and Other Special Benefit Assessment Districts: Finally, given the importance of Oxnard Maintenance Assessment District 4 to Areas Three and Four as set forth in the Proposal and MAD-4's relevance to these proceedings, we also reserve all rights to challenge the legality of the formation and ongoing operation of Oxnard Maintenance Assessment District 4, to which all owners in the Colony and Hotel pay annual assessments, as well as the formation and operation of other special benefit assessment districts throughout the City. We believe that the entire MAD-4 area, with certain very minor exceptions, is a general benefit area, since even the medians serve as the City's gateway to Oxnard State Beach, certainly one of the City's most valuable resources and open to the general public. While we are not advocating an end to the MAD-4 assessments at least at this time, the beach, walkways, bike paths, fire lanes and greenbelt areas, as well as the free beach parking, since their construction almost 40 years ago, have overwhelmingly been used by the general public. Their maintenance should never have been funded by a special district and we believe the City may have relied excessively on consultants to operate such districts and utilized special benefit assessment funds for purposes not directly related to the functioning of such districts.

In connection with these concerns, as we have previously suggested to the City, we respectfully suggest that, similar to what the City recently did with the MAD-4 Oxnard Shores public parking lot, the City should extend the Park's boundaries to include MAD-4's public greenbelts, walkways and beach — they are already indistinguishable to the general public — return the topography of Oxnard State Beach to its original, natural state and start over again from scratch, working with the Coastal Commission and residents of the area, to create a more environmentally-friendly, stable and sustainable beach. As part of this effort, the giant sand piles looming over the ADA paths and fire lanes should be returned to the beach or sold to the highest bidder and the invasive, non-native and poisonous plants the City planted decades ago should be removed and replaced with native vegetation. We can then work together to generate an effective maintenance plan to keep the sand on the beach and to keep public access to the beach open and its magnificent public views available for all of Oxnard's residents and visitors.

Taking these relatively inexpensive, but effective steps will begin to repair damage to the soil, will protect habitats for shoreline birds and other wildlife, will prevent beach erosion, will ensure emergency vehicle and public access to the beach, particularly handicapped-accessibility, will promote and protect public health and safety, will restore greenbelts, park areas and parking spaces lost to encroaching sand, and will provide protection against wave run-up and rising sea levels. Such an initiative would result in a win-win-win for the City, the Hotel and all of the City's residents and visitors, including residents of the Colony.

If we can work out an agreement regarding the sand management and dune restoration plans for Areas Three and Four, we might also consider waiving certain of the concerns identified above.

Our Shared Vision: As noted above, we would love to see the areas described in the Proposal as Areas Three and Four regraded and redeveloped into a low-lying natural dune network hugging the topography of the original flat beach that existed before the City manufactured the artificial sand piles and planted non-native, invasive plant species that have overwhelmed any native plants that might have existed in the area. That network of newly developed natural sand dunes would feature native California vegetation planted in place of the non-native invasive species that currently dominate the area and overwhelm and choke out native plant life. Such native vegetation might at some point in the future even become an attractive nesting area for endangered species. It is easy to visualize a natural dune network similar to Ventura's Surfer's Point growing in these areas, crisscrossed with boardwalks and educational installations, and designed to facilitate full public access to beautiful Oxnard State Beach, which should be internationally recognized as one of America's most beautiful public beaches. Public views from a reconstituted greenbelt

park area should be restored to allow picnickers to begin using the area again and to allow the general public to see the shoreline, Santa Barbara Channel and Channel Islands National Park in the distance, scenic vistas that would no longer be blocked by massive sand piles.

But that is not what currently exists in Area Four south of the Hotel and the proposed sand management plan should not create false impressions of what exists there today. We believe the City should insist upon a sand management plan that will get us to the desired outcomes. The current Proposal will not succeed in accomplishing that. We would strongly support a sand management plan and a dune restoration plan that will restore our neighboring beach to its original generally flat state, without the sand piles, without the non-native, invasive plant species, and with a plan to create a network of topography-hugging natural sand dunes held in place by naturally-occurring, native California dune mat that can eventually become an environmentally sensitive dune habitat area.

On behalf of all of the owners and residents of the Colony, thank you very much to the City employees who worked hard to prepare this report, despite its substantive and procedural failings.

I would appreciate hearing back from you at your earliest convenience to confirm your receipt of our concerns. If you disagree with any of the statements and suggestions I have made in this communication, I would appreciate if you would identify the statements or suggestions with which you disagree and the details regarding the disagreement.

Please also feel free to contact me at any time to discuss our concerns and potential solutions. We are anxious to work together with the City and to create a win-win situation for the City and for all of Oxnard's residents and visitors.

We look forward to remaining in close touch with you as you move forward with this plan.

In addition to the City addressees, I am also sending copies of these comments to California Assemblymember Steve Bennett, California Coastal Commission South Central Coast Director Steve Hudson, and Zachari Dunes at Mandalay Beach General Manager Glenda Rivera.

Thank you again for your attention to our concerns. We look forward to continuing our collaboration going forward.

Respectfully submitted on behalf of The Colony at Mandalay Beach Owners Association,
Lorin Fife, Esq.
President
The Colony at Mandalay Beach Owners Association
2317 Vina Del Mar
Oxnard, CA 93035
lorinfife@gmail.com

Garett Guenot
General Manager
The Colony at Mandalay Beach Owners Association
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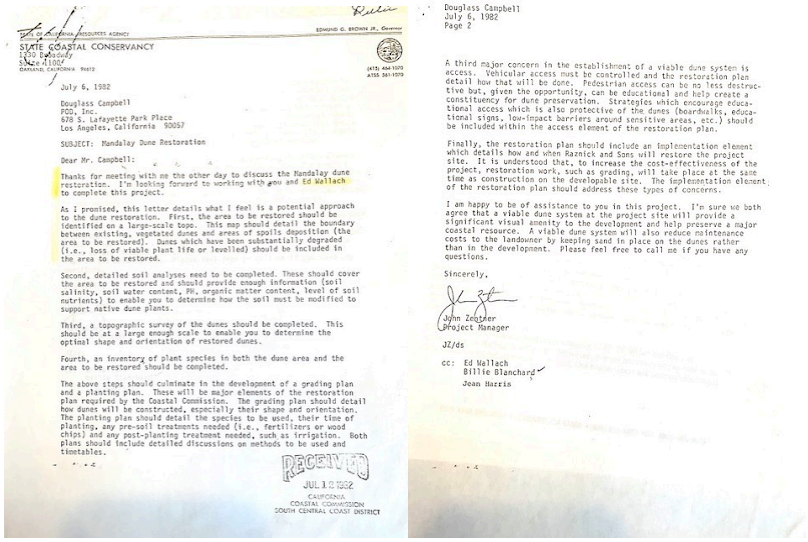
Glen Kulik, Esq.
Kulik Gottesman Siegel & Ware

15303 Ventura Blvd., Suite 1400
Sherman Oaks, CA 91403
gkulik@kgswlaw.com

Attachment 1: Letter dated July 6, 1982 from John Zentner, Project Manager, California State Coastal Conservancy, to Douglass Campbell, environmental consultant, discussing the pending development of the area that became the Park, the Hotel and the Colony, the developers (which included Raznick and Sons), and dune restoration, not dune creation.



STATE COASTAL CONSERVANCY
1330 Broadway
Suite 1100
OAKLAND, CALIFORNIA 94612

EDMUND G. BROWN JR., Governor

(415) 464-1070
ATSS 561-1070

July 6, 1982

Douglass Campbell
PDD, Inc.
670 S. Lafayette Park Place
Los Angeles, California 90057

SUBJECT: Mandalay Dune Restoration

Dear Mr. Campbell:

Thanks for meeting with me the other day to discuss the Mandalay dune restoration. I'm looking forward to working with you and Ed Wallach to complete this project.

As I promised, this letter details what I feel is a potential approach to the dune restoration. First, the area to be restored should be identified on a large-scale topo. This map should detail the boundary between existing, vegetated dunes and areas of spoils deposition (the area to be restored). Dunes which have been substantially degraded (i.e., loss of viable plant life or levelled) should be included in the area to be restored.

Second, detailed soil analyses need to be completed. These should cover the area to be restored and should provide enough information (soil salinity, soil water content, PH, organic matter content, level of soil nutrients) to enable you to determine how the soil must be modified to support native dune plants.

Third, a topographic survey of the dunes should be completed. This should be at a large enough scale to enable you to determine the optimal shape and orientation of restored dunes.

Fourth, an inventory of plant species in both the dune area and the area to be restored should be completed.

The above steps should culminate in the development of a grading plan and a planting plan. These will be major elements of the restoration plan required by the Coastal Commission. The grading plan should detail how dunes will be constructed, especially their shape and orientation. The planting plan should detail the species to be used, their time of planting, any pre-soil treatments needed (i.e., fertilizers or wood chips) and any post-planting treatment needed, such as irrigation. Both plans should include detailed discussions on methods to be used and timetables.

RECEIVED
JUL 12 1982
CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

Douglass Campbell
July 6, 1982
Page 2

A third major concern in the establishment of a viable dune system is access. Vehicular access must be controlled and the restoration plan detail how that will be done. Pedestrian access can be no less destructive but, given the opportunity, can be educational and help create a constituency for dune preservation. Strategies which encourage educational access which is also protective of the dunes (boardwalks, educational signs, low-impact barriers around sensitive areas, etc.) should be included within the access element of the restoration plan.

Finally, the restoration plan should include an implementation element which details how and when Raznick and Sons will restore the project site. It is understood that, to increase the cost-effectiveness of the project, restoration work, such as grading, will take place at the same time as construction on the developable site. The implementation element of the restoration plan should address these types of concerns.

I am happy to be of assistance to you in this project. I'm sure we both agree that a viable dune system at the project site will provide a significant visual amenity to the development and help preserve a major coastal resource. A viable dune system will also reduce maintenance costs to the landowner by keeping sand in place on the dunes rather than in the development. Please feel free to call me if you have any questions.

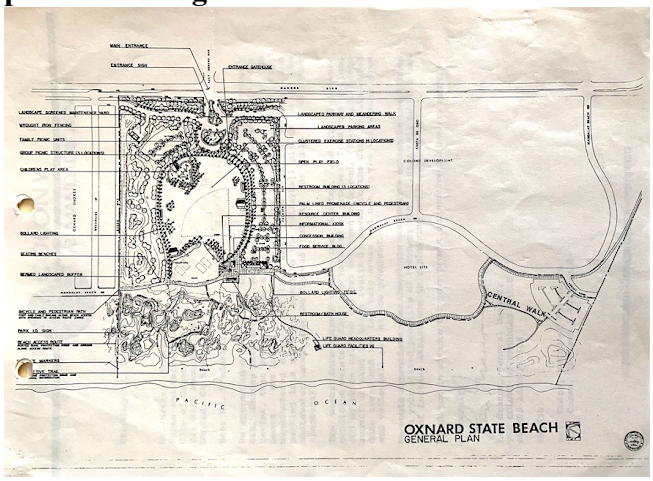
Sincerely,

John Zentner
Project Manager

JZ/ds

cc: Ed Wallach
Billie Blanchard
Jean Harris

Attachment 2: City of Oxnard Topographical Map of Oxnard State Beach General Plan (1983, prepared in connection with dune restoration contemplated by Attachment 1, the map is oriented so that east is at the top of the map) – note the almost total absence of sand dunes in the topography other than immediately west (seaward) of the Park and at the extreme southern end of the beach near the public Parking Lot.



Attachment 3: Oxnard City Council Resolution 8586, dated November 22, 1983, expressly describing the area south of the Hotel and west of the Colony as a "public greenbelt."

CITY COUNCIL OF THE CITY OF OXNARD

RESOLUTION NO. 8586

RESOLUTION ORDERING FORMATION OF MANDALAY BEACH MAINTENANCE DISTRICT

WHEREAS, by Resolution No. 8571 adopted on November 1, 1983, the City Council declared its intention to order the formation of a maintenance district including the property within the boundaries of Tract 2923; and

WHEREAS, after notice having been given as required by law a public hearing was held on November 22, 1983, for the purpose of hearing and passing on protests against the formation of the district; and

WHEREAS, at such hearing no protests were received from the owners of property to be included within the district;

NOW THEREFORE, IT IS RESOLVED AS FOLLOWS:

1. The Mandalay Beach Maintenance District is hereby ordered to be formed.

2. The boundaries of the district are as described in Exhibit A and as shown on Exhibit B attached hereto.

3. The purposes of the district are as follows:

Maintenance of the beach area to be dedicated by the developer of Tract No. 2923 and all landscaping located within public rights-of-way to be constructed within such tract including the landscaping to be located within the public greenbelt and bicycle and pedestrian way adjacent to the southerly boundary of the tract.

Approved and adopted this 22nd day of November, 1983.

AYES: COUNCILMEMBERS TAKASUGI, JOHN, KATO, LOPEZ, MARON

NOES: NONE

ABSENT: NONE

Nao Takasugi

Nao Takasugi, Mayor

ATTEST:

Mabi Covarrubias

Mabi Covarrubias, City Clerk

APPROVED AS TO FORM:

K. M. Ayers

K. M. Ayers, City Attorney

Attachment 4: Aerial view of the future site of the Park, the Colony and the Hotel, circa 1982, showing a complete lack of sand dune morphology in Areas 3 and 4 of the Proposal.



Attachment 5: Aerial view of Oxnard State Beach, 1984, during construction of the Colony and the Hotel, showing lack of sand dune morphology in Area 4 and flat terrain hugging dunes in Area 3.



Attachment 6: Ice plant and hay bales positioned by City employees in 1991 to help manufacture sand piles south of the Hotel. Note bulldozer treads and repositioned sand.



Attachment 7: Oxnard City employee pushing sand with bulldozer onto hay bales to create sand piles south of the Hotel, 1991.



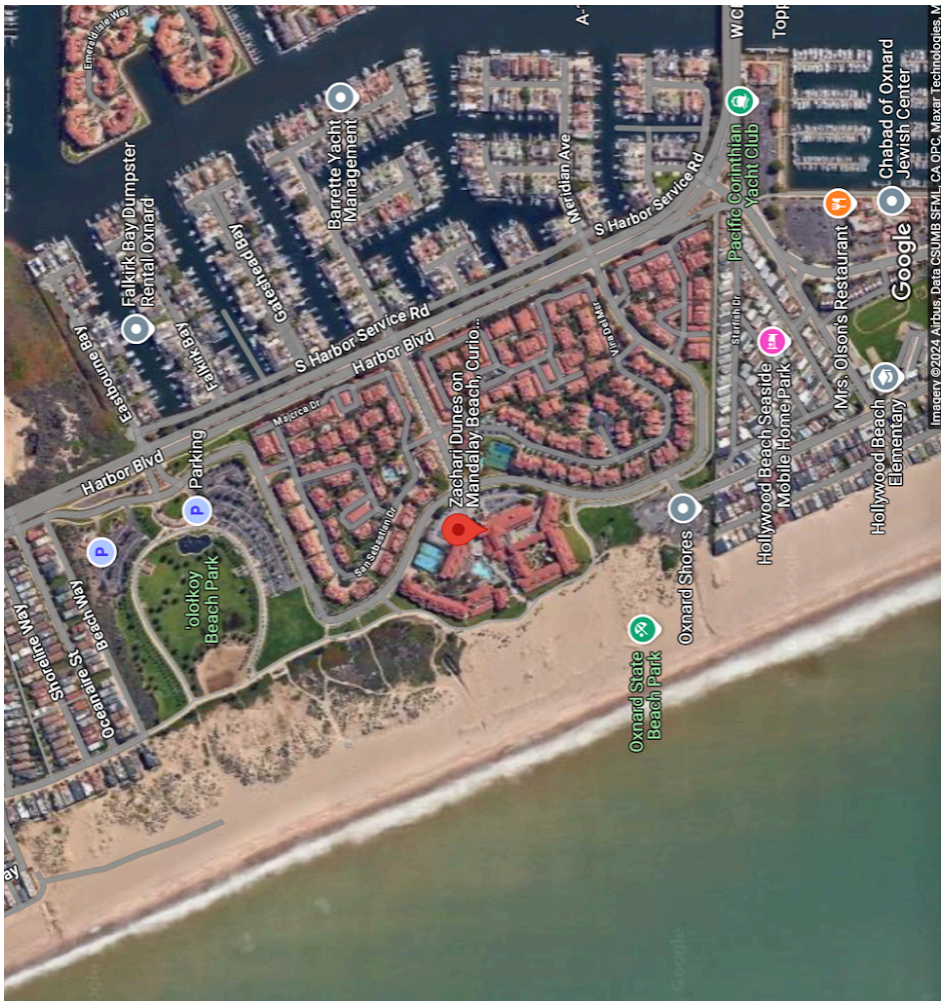
Attachment 8: Oxnard City employee pushing sand with bulldozer to create sand piles south of the Hotel, 1991. Note iceplant planted by City employees and benches and garbage can in the foreground subsequently buried under sand piles along concrete ADA pathway adjacent to public greenbelt.



Attachment 9: View of Oxnard State Beach, greenbelt south of the Hotel and Oxnard Shores parking lot near the intersection of Sunset Lane and Mandalay Beach Road, circa 1992.



Attachment 10: An aerial view of Oxnard State Beach today showing flat beaches between the Hotel and Hollywood Beach residences and the shoreline, and the sand piles created by the City between the Parking Lot and the former greenbelt public park area and the shoreline.


Falkirk Bay Dumpster Rental Oxnard
Barrette Yacht Management
Meridian Ave
S Harbor Service Rd
Pacific Corinthian Yacht Club
Chabad of Oxnard Jewish Center
Google
Harbor Blvd
Majorca Dr
Zachari Dunes on Mandalay Beach, Curio...
Mrs. Olson's Restaurant
Hollywood Beach Seaside Mobile Home Park
Hollywood Beach Elementary
Parking
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Oxnard Shores
Oxnard State Beach Park
Imagery ©2024 Airbus, Data CSUMB SFML, CA OPC, Maxar Technologies

Guzman, Christen <christen.guzman@oxnard.org>

[Ask Planning Action] Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit

1 message

N D <norairdd@outlook.com> Thu, Oct 17, 2024 at 12:25 PM
To: "Planning@oxnard.org" <Planning@oxnard.org>

Dear Planning Commission members,

I am very concerned about the proposed Sand Management plan. I have lived in the Oxnard Shores area for many years. I have spoken to many of my neighbors in the Colony at Mandalay Beach and others I know who live nearby, where we all will be impacted by the proposed sand management plan. I agree with the thoughtful and thorough objections filed by Mr. Lorin Fife, on behalf of the residents in the Colony at Mandalay Beach.

I urge you to please not adopt this proposal.

I have read the proposed plan and agree with the objections that Mr. Fife has presented.

Below is a brief summary of my objections.

1. In the proposal there are references to Area Four as a "environmentally sensitive habitat area," "endangered species habitat" or "natural dune topography." I disagree with this assessment. As mentioned, I am a long-time resident of this area, and I have not seen any of this. This is completely inaccurate. I remember when the City of Oxnard created these huge sand piles near the hotel. The City used sand bags, bales of hay, invasive vegetation and plants that were non-native. I thought this was totally wrong. Again, being a long-time resident of the Colony, and spending much of my time outdoors in and around this area, my family and I have not seen any endangered plant or wildlife species that reside or nest in those sand piles. And I noticed that this was actually documented in the City's own proposal. All of us living in this area watched and made note of the City bulldozers destroying the beach and shoving the sand into these piles on top of hay bales and installing irrigation to water certain plants. I agree with Mr. Fife that someone in the Oxnard Public Works Department has totally made a mistake on this, because there is nothing even close to being environmentally sensitive about the sand piles that City employees made in Area Four. I agree also that all of those references should be removed. And I also agree with Mr. Fife, that Area Four references should be removed from the sand management plan, unless the plan is revised and calls for the sand pile areas to be returned to their original condition.

2. I am very disturbed about the fact that the City took two full years since the first draft of this plan was made available for public comment, and then lengthening it from 334 pages to 540 pages, and then giving the public less than a week (a week filled with holidays) to review it and provide objections. This is unacceptable. This appears to be a case where the City wants to push something through knowing that with these time constraints, they would not get any meaningful public response or objections. I strongly urge that the Commission should act to defer action on this proposal and allow neighbors and public be given a reasonable opportunity and amount of time to review the proposal.

3. My neighbors and I have for years noted that the City has not honored its obligation to maintain Area Four. What this has done is to allow the sand piles to invade and overwhelm the large greenbelt public park area south of the hotel. As a result, the public can't use this area for social activities, and the public views of the coast from this greenbelt are blocked. In addition, as a result of the sand pile migration, the greenbelt park area has become unsafe, which has forced visitors and residents like myself to almost completely stop using it.

4. I believe that the proposal to move the excess sand in Area Four to areas west of the sand piles and walkways does not make sense and is an exercise that will not result in any benefit. Within a day or two the sand will blow right back to where the City moved it from, and this would block the ADA pathways, the bike path and emergency vehicle access to the beach, which would then create safety hazards. I agree with Mr. Fife that the City should find another community with eroding shoreline like Malibu or Port Hueneme and sell our excess sand to those neighbors who need this natural resource that our City has in abundant quantities.

5. I also strongly believe this plan should also provide for removal of the myoporum "grove," that the City planted near the parking lot in Area Four. These plants contribute to the piles of sand and debris that constantly litter the parking lot. They are non-native and very much invasive, they contribute to the huge sand piles the City built, and they are a haven for criminals. I believe the City by planting these plants there, is a clear violation of the Coastal Commission's rules.

Respectfully,

Norair Demerdjian

2214 Martinique Lane, Oxnard

Sent from Outlook

CITY OF OXNARD CALIFORNIA

Guzman, Christen <christen.guzman@oxnard.org>

[Ask Planning Action] Re: Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit

1 message

Peter Ackerman <packerman11@sbcglobal.net> Thu, Oct 17, 2024 at 1:14 PM
To: "Planning@oxnard.org" <Planning@oxnard.org>

Dear Members of the Planning Commission,

I am a 10-year resident of the Colony at Mandalay Beach and Secretary of its Board of Directors.

I write to express my concerns with the Oxnard Sand Management Plan that is on the agenda for today's Commission hearing. My views are shared by many if not all of my neighbors who live in the Colony, and throughout the Oxnard Shores neighborhood in which we are located. We are all directly impacted by this proposal. While it is long, I strongly urge you to read the objections filed by Lorin Fife, our neighbor and President, on behalf of the residents of the Colony.

Please do not adopt this proposal! A short summary of our objections follows.

1. It took the City two years since the first terrible draft of this proposal was made available for public comment to release this second draft. This second draft grew from 334 pages to 540 pages, and the City then gave the public less than a week -- a week filled with 4 holidays – to review it and provide objections. That is simply unacceptable and is a violation of the public's right to due process. For this reason alone, this proposal should be tabled and the public should be given a reasonable time – at least 30-60 days -- for review and comment.

2. It is simply incorrect to refer to any part of Area Four in the proposed Plan as an "environmentally sensitive habitat area," "endangered species habitat" or "natural dune topography." Neighbors who lived here in the mid-1980s witnessed the City create the gigantic sand piles south of the hotel with hay bales, sand bags, non-native, invasive vegetation like iceplant and myoporum, and bulldozers. In my 10 years here I have never seen any endangered plant or wildlife that reside or nest in those sand piles, nor has the City produced any documentation supporting designating Area 4 as environmentally sensitive. What I have seen are historic photographs showing City bulldozers destroying the previously flat beach and shoving the sand into huge piles on top of hay bales, and installing irrigation to water the iceplant. There is nothing remotely environmentally sensitive about the sand piles that City employees manufactured in Area Four. All those references should be removed from the sand management plan. In fact, the plan should be revised to call for the sand pile areas to be returned to their original condition, before the City created them.

3. For years now, the City has abandoned its obligation to maintain Area Four, allowing the sand piles to invade, overwhelm the large greenbelt public park area south of the hotel, and block ADA walkways. As a result, persons with mobility issues can't access the beach, the public can't picnic in this area, and the beautiful public views of the coast from this greenbelt are blocked. In addition, as a result of the sand pile migration, the public greenbelt park area has become unsafe, which has forced visitors to the beach to almost completely stop using it.

4. Simply moving the excess sand in Area Four to areas west of the sand piles and walkways will be an exercise in futility. Within 24 hours it will blow right back to where the City removed it, to once again block ADA pathways, the bike path and emergency vehicle access to the beach, and recreating safety hazards. There are other cities with eroding shorelines -- Malibu and Port Hueneme come to mind -- that could be interested in purchasing our excess sand that our City has in abundant quantities.

5. This plan should also provide for removal of the non-native myoporum "grove" that the City planted near the parking lot in Area Four. These plants contribute to the piles of sand and debris that constantly litter the parking lot. They are non-native and invasive, contribute to the massive sand piles the City built, and are a haven for criminals. Why the City ever planted these plants there, which clearly violate the Coastal Commission's rules, is a mystery.

This proposal is dreadful and needs to be substantially revised. Please send it back to Public Works so they can work with folks in the neighborhood to craft a sand management plan that makes sense and reflects reality.

Sincerely,
Peter B. Ackerman, Esq.

Guzman, Christen <christen.guzman@oxnard.org>

[Ask Planning Action] Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit)

1 message

Susan Tipton <susanmbcolony@gmail.com> Thu, Oct 17, 2024 at 1:20 PM
To: planning@oxnard.org
Cc: Jim Tipton <jimtipton@yahoo.com>, Lorin Fife <lorinfife@gmail.com>

Members of the Planning Commission,

I urge you, please do NOT adopt this proposal!

I am expressing views shared by many of my neighbors who live inside and outside the Colony, where my husband and I have been full-time residents since 2016. The Hollywood Beach, Mandalay, and Oxnard Shores communities all use these beach areas, as do visitors to our city, and would be directly impacted by this proposal.

I'm aware our HOA President, Lorin Fife, has sent detailed objections, which I assume you will have read prior to reaching any conclusions about this proposal. I also serve on our homeowner Board of Directors.

Here is a brief summary of my objections:

1. **We have not been given a reasonable amount of time to review and comment on this lengthy proposal**—540 pages. I'd respectfully request a minimum of 90 days.

2. **The "sand piles" in Area Four need to be removed to fully restore public access and enjoyment of the beach.** The City artificially created these massive sand piles south of the hotel with hay bales, sand bags, non-native, and invasive vegetation. These piles are made worse by the city workers who scoop-shovel sand from walkways and re-deposit it on top of these ever-growing "piles".

3. **Safety Concerns:** These sand piles, with their dense foliage, pose a safety issue; neighbors have observed people taking shelter there—hiding out/sleeping/using drugs. Also, the sand pile behind the hotel is at least 5 feet high and covers more than half the fire lane. The excess sand blows onto all the walkways making it difficult, dangerous, or impossible for neighbors to navigate, especially those with mobility limitations, thereby limiting the ability to enjoy this beach area.

4. **There is a better use for this excess sand.** Neighboring beaches are losing sand; I support investigating opportunities to give or possibly sell our excess sand to those other communities.

The current practice and proposal does not solve the problem of excess sand which blows onto our greenbelt and walkways. It is not aligned with the goal of keeping our beaches safe and accessible to our community.

Please consider saying "NO" to this proposal. At a minimum at least please allow time to fully review this lengthy document.

I thank you for your time and attention.

Sincerely,

Susan Tipton

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Sent from my iPad

Guzman, Christen <christen.guzman@oxnard.org>

[Ask Planning Action] Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit)

1 message

'bv' via Planning <planning@oxnard.org> Thu, Oct 17, 2024 at 2:29 PM
Reply-To: bv <billviolante@aol.com>
To: "planning@oxnard.org" <planning@oxnard.org>

RE: Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit)

Dear Members of the Planning Commission,

I am expressing views shared by many numerous residents living in he Mandalay Beach and Hollywood Beach areas of Oxnard. We are all directly impacted by a proposal pertaining to the dunes north and south of the Zachari Dunes Hotel . I am requesting that you DO NOT adopt the proposal! Following is a summary of my objections:

- The City took two full years since the first draft of this plan was made available for public comment, lengthening it from 334 pages to 540 pages. The public was then gave the public less than a week (a week filled with holidays) to review it and provide objections. My 30+ years of political experience tells me that this type of action appears to be a manipulation of the political process usually entered into to rush a project through for approval. A the very least this matter should be tabled and neighbors should be given a reasonable opportunity to review the proposal. However, more importantly for the following reasons this project should be disapproved:

- Referring to any part of Area Four in the proposal as an "environmentally sensitive habitat area," "endangered species habitat" or "natural dune topography" is a false assumption. Anyone with a historical knowledge of the area knows the City created these gigantic sand piles south of the hotel with hay bales, sand bags, non-native, invasive vegetation like ice plant and myoporum, and bulldozers. It is common knowledge amongst long life area residents that there are no endangered plant or wildlife species that reside or nest in those sand piles, which is documented in the City's own proposal. Our neighbors watched and photographed the City bulldozers destroying the beach and shoving the sand into these piles on top of hay bales and installing irrigation to water the ice plant. Somebody in the Public Works Department must have a vivid imagination, because there is nothing remotely environmentally sensitive about the sand piles that City employees manufactured in Area Four. All those references should be removed. In fact, Area Four should probably be removed from the sand management plan, unless the plan is revised and calls for the sand pile areas to be returned to their original condition.

- For years now, the City has abandoned its obligation to maintain Area Four, allowing the sand piles to invade and overwhelm the large greenbelt public park area south of the hotel. As a result, the public can't picnic in this area and the beautiful public views of the coast from this greenbelt are blocked. In addition, as a result of the sand pile migration, the public greenbelt park area has become unsafe, which has forced visitors to the beach to almost completely stop using it.

- Simply moving the excess sand in Area Four to areas west of the sand piles and walkways is a ridiculous suggestion, an exercise in futility. Within 24 hours it will blow right back to where the City moved it from, continuing to block ADA pathways, the bike path and emergency vehicle access to the beach and recreating safety hazards. The City should find another community with eroding shoreline like Malibu or Port Hueneme and sell our excess sand to those neighbors who need this natural resource that our City has in abundant quantities.

- This plan should provide for removal of the myoporum "grove," that the City planted near the parking lot in Area Four. These plants contribute to the piles of sand and debris that constantly litter the parking lot. They are non-native and invasive, contribute to the massive sand piles the City built, and they are a haven for criminals. Why the City ever planted these plants there, which clearly violate the Coastal Commission's rules, is a mystery.

This plan needs to be reworked with community input.

Thank you for your kind consideration

Bill Violante
Mandalay Beach Resident

Guzman, Christen <christen.guzman@oxnard.org>

[Ask Planning Action] Public Hearing: Oxnard Sand Management Plan

1 message

'LAURA JOHNSON' via Planning <planning@oxnard.org> Thu, Oct 17, 2024 at 2:31 PM
Reply-To: LAURA JOHNSON <johnson.home1@verizon.net>
To: planning@oxnard.org

Members of the Planning Commission and City Staff:

We are submitting this email prior to the public hearing scheduled for this evening on the Oxnard Sand Management Plan and request that the Planning Commission reschedule this public hearing item to a date in the future because one week is not sufficient time for the average community member to review and prepare comments on the lengthy document provided with the agenda.

Sincerely,

Dennis & Laura Johnson
4425 Antigua Way
Oxnard, CA. 93035

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 1

Lorin Fife <lorinfife@gmail.com>
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Ho
<steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen K

VIA EMAIL
City of Oxnard Planning Commission
planning@oxnard.org

Re: Public Hearing, Thursday, December 5, 2024, continued from October 17, 2024, re Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-4(Permit): Additional Objections and a Settlement Proposal on behalf of The Colony at Mandalay Beach Owners Association, representing 440 residences adjoini the proposed Sand Management Plan

Dear Mayor Zaragoza, Councilmember Perello, City Manager Nguyen, Public Works Director Wolfe, Deputy Public Works Director Howlett, Assistant Public Works Dire Pearson and members of the Planning Commission,

A short while ago, I sent out a single email containing a lengthy message with feedback concerning the City's proposed sand management plan. Unfortunately, it appears so I will attempt to send it to you in several installments. I apologize for any inconvenience with this format and for any duplication if you actually receive my email sent

As you already know, I serve as President of The Colony at Mandalay Beach Owners Association (the "Colony"), representing 440 residences immediately adjacent to are sand management plan (the "City Proposal").

THE NEED TO POSTPONE HEARINGS REGARDING THE CITY PROPOSAL AND THE CITY'S INVITATION TO MEET: We strongly urge the City to pos City Proposal indefinitely and to confirm that postponement as soon as possible. The 540-page City Proposal is incredibly lengthy, extremely complex and detailed, cover disparate areas and issues, some of them explosive, and deserves and requires significantly more time for interested parties and representatives of the City to sit down and disagreement.

We appreciate the email we received from Brian Yanez on Wednesday, October 30, seeking an initial meeting with representatives from the Colony and other community r requesting such a meeting at the City's 2022 public workshop regarding the City Proposal (the "2022 Workshop"). We have provided Mr. Yanez with several dates and ho scheduled promptly.

We also appreciated City Manager Alex Nguyen's outreach on October 17, letting us know that City staff were recommending that the City Proposal be continued at the C that evening, which it was. However, the Planning Commission only continued the matter until December 5, which is not nearly enough time to resolve all of the issues cr

A BRIEF SUMMARY AND WHY THE CITY PROPOSAL ATTRACTED SUCH A STRONG REACTION: Frustrated with the costs of cleaning up sand blown of the neighboring areas south of what is now the Zachari Dunes hotel (the "Hotel"), the City around 1986 decided to begin artificially manufacturing gigantic sand piles util plants, hay bales, sand bags, irrigation systems and bulldozers. Not only did these sand piles fail to control the sand blowing off the beach, they now bury pedestrian walk the City's own irrigation equipment, block handicapped and emergency vehicle beach access, make bike paths and fire lanes impassable, devour beautiful public greenbelt and fall hazards where blown sand has raised greenbelt areas, and fill up the public parking lots, while providing cover for illegal drug users and individuals shooting off i serve as an elevated launching pad, allowing the windblown sand to reach further inland and into streets from which it can no longer be returned to the beach. In Appendi illustrative copies of correspondence from the City and additional photos documenting some of the history of City mismanagement and neglect in the beach areas neighbo Three and Four.

We believe that it would be in everybody's best interest to work together to fix these problems. Unfortunately, the City's recently proposed sand management plan would irreversible. In the pages below, we suggest an alternate approach, which we think will be more constructive, will engage our entire community in restoring the beauty of surrounding neighborhoods, will cost less in the long run and will transform Oxnard State Beach into one of the Pacific Coast's, if not the entire world's, most beautiful an advanced beaches, elevating the quality of life for all of Oxnard's residents and visitors.

From a personal perspective, our family has lived in this neighborhood for almost 40 years, and I am intimately familiar with the history of the beach areas near the Colony Proposal. Those beach areas are among our City's and region's most valuable natural resources.
One of my fellow Colony homeowners and an important member of our Colony residents committee reviewing the City Proposal, Fran Pavley, represented this area in the and served with distinction on the California Coastal Commission (the "CCC") for many years. Ms. Pavley and I worked together with other Colony residents reviewing the City Proposal and formulating the Colony Proposal set forth below.

The views we express here are extremely personal to all of us who live and have homes in the area, and we are confident represent the views of most visitors to the area. objections are lengthy, they are necessarily detailed to respond to all of the issues raised by the 540-page City Proposal.



This photo symbolizes to many of us the City's decades-long neglect and mismanagement of our neighborhood. Buried under the sand lies an ADA walkway with benche Hunt Rehab Point pedestrian path north of the Hotel and west of 'ololkoy Beach Park (formerly known as Oxnard Beach Park, the "Park"). Those are public benches and walkway specifically designed for disabled members of our community to rehabilitate themselves. Those benches and garbage cans are buried in sand that took months of accumulate.

The City staff needs to understand that it was one thing for the residents of our area to receive periodic promises from the City that it would clean up the messes it has crea our beaches as illustrated in Appendix 1 of this communication, hoping that the City might occasionally keep those promises. However, when the City decided to enshrine bulldozer-manufactured sand piles as "environmentally sensitive habitat areas," despite the fact that the City's own surveys prepared by expensive consultants found no sig animal species anywhere within a mile of these areas and the City's actions had repeatedly violated its own Local Coastal Plan as illustrated in Appendix 2 of this commur our area's residents into action.

When the City then — after two years of apparently ignoring our objections to the original draft sand management plan and decades of providing the residents of our area and with less than a week's notice during the run-up to municipal elections — tried to race through the Planning Commission a 540-page report that would give the City le about the problem that it created in the first place, our community realized that we need to stand up for our rights.

The City now has a choice. If it moves this matter forward without resolving the issues raised at least with respect to Areas Three and Four in the City Proposal, the City v neighbors of Areas Three and Four, as well as other areas of the City, in an untenable situation. Such a situation would have the potential to result in lengthy and costly ad would generate terrible publicity and not be in anyone's best interest. To avoid such unnecessary proceedings and the attendant publicity, the residents of the Colony respe approach to the City Proposal as described below (the "Colony Proposal").

Once the City has had an opportunity to review the Colony Proposal and our additional objections to the City Proposal, we suggest meeting to discuss them in greater deta there are elements of the Colony Proposal that the City feels require modification.

THE COLONY PROPOSAL: We propose a multi-phase approach to resolve the longstanding environmental and public health challenges presented by the City-manufa nurtured non-native, invasive vegetation located in Areas Three and Four. We believe that this situation presents an opportunity to engineer a win-win-win solution for the

neighboring Hotel and the residents of the Colony, as well as all of the other residents of Oxnard Shores and the City as a whole, which will be viewed as visionary in retro Colony Proposal in the constructive manner in which it is intended.

Phase One: The City would continue the December 5, 2024 public hearing scheduled for the City Proposal before the City's Planning Commission to a date uncertain, p City Proposal indefinitely. At this juncture, it might be advisable to remove Areas Three and Four from the City Proposal. If the City and its residents decide to remove A City Proposal, the remaining elements of the City Proposal that do not affect either Area Three or Area Four could then move forward as quickly as the City, the neighbors the Oxnard Shores Neighborhood Council and other interested parties, desire.

Phase Two: The City would form an interested party working group (the "Working Group") to focus on an Oxnard State Beach restoration project consisting of represent Manager's office, the City Public Works Department, City Councilmember Bert Perello's office, Assemblymember Steve Bennett's office, the owners of the Hotel, and the if that is considered advisable. The Working Group might also include at least some of the parties involved in the extremely successful beach restoration project at Surfers example, the Coastal Conservancy, the Surfriders Foundation and BEACON (the Beach Erosion Authority for Clean Oceans and Nourishment), as well as other parties up might agree.

Phase Three: The City would convene the Working Group to prepare a sand management plan and beach restoration plan for each of Area Three and Area Four, and othe Proposal if desired, that will focus on the distinct and unique environmental and public health needs of each of those Areas. We anticipate that the sand management and b focusing on Areas Three and Four could be created and agreed upon by the interested parties relatively quickly, simplifying the public hearing process and assuring comm restoration of areas that represent some of the City's greatest natural resources and a potentially huge financial resource, as well. We also believe that substantial grants fr available for a project of this scale and ambition, and that it might be advisable at this point in the process to form a nonprofit corporation or recruit a nonprofit fiscal spon this enterprise. The City might even consider naming rights for the beach areas as a source of ongoing maintenance funding.

Phase Four: Once the interested parties come to an agreement on the sand management and beach restoration plans, the City's approval process, at least with respect to A be extremely smooth. As noted above, we envision a project similar to the successful beach restoration project that occurred in the City of Ventura at Surfers Point (see, e. coastalresilience.org/case-studies-of-natural-shoreline-infrastructure-in-coastal-california/), bringing together many of the same parties to address a project with a surplus problem from the challenge that confronted the interested parties working on Surfers Point, which suffered from dramatic beach erosion.

This approach would eliminate concerns over who has done what historically, eliminate finger-pointing and arguments over who is liable for what, and unite the communi bring the best science and engineering expertise together to create a new model beach, the most attractive beach on the Pacific coast, creating an economic bonanza for the

We strongly advocate utilizing natural shoreline infrastructure to develop a new natural-forming network of sand dunes along the shoreline of Oxnard Shores, which will p shoreline hazards and provide an alternative to coastal armoring, which we generally oppose. We understand that, at least partially because of beach restoration efforts in t become Ventura County's most visited beach.

Once a similar plan for Oxnard State Beach is created and then implemented, it will, we believe, lay the groundwork to transform the Oxnard Shores area into one of the c sandy beaches and make our City's leaders and staff look like visionaries. We also believe that the City would benefit from increased tourism that such a project would att from successfully cleaning up our Oxnard Shores beaches might also extend to neighboring communities, restoring demand for commercial and hospitality spaces on the C peninsula and along its waterfront, as well as other areas bordering Oxnard Shores and Channel Islands Harbor. This of course would help increase tax revenues for the C upgrades to the Hotel.

We also envision establishing an arrangement with neighboring cities, possibly Malibu, Port Hueneme, Ventura or other communities suffering from beach erosion (the "P sell surplus sand generated in Oxnard Shores, and in particular from Areas Three and Four, to those Purchasing Communities, which are in desperate need periodically for beaches. Moving excess sand from a neighboring coastal community with surplus beach sand seems far more desirable environmentally and economically than forcing th purchase sand from inland quarries, which is what we understand at least some of them have been forced to do historically. We envision the City becoming an exporter of it has in over-abundance, and transforming that valuable commodity into a significant source of revenues for the City rather than a financial drain. This in turn might help struggles to locate funds to perform its basic maintenance responsibilities in the areas surrounding the Colony.

During this Phase, we also envision the City updating its Local Coastal Plan, which has not been updated since 2002, based among other things on a survey of the most cu of reliable sources concerning sea level rise and other potential hazards to our local coastal communities.

Phase Five: The City would work with all interested parties to supervise implementation of the approved sand management and beach restoration plans (the "Beach Rest with the parties assembled during Phase Four. This project would return the beach areas to their original topography as documented in the City's own topographical maps removing all non-native vegetation from the beach areas and park areas and starting over, replanting the beach areas with native California dune mat vegetation that would naturally occurring sand dune network with natural dune morphology holding the beach in place, at least in Areas Three and Four, if not from the north end of Area One to and providing a natural barrier to hazards inherent to our beachfront community.

Such native vegetation might at some point in the future even become an attractive nesting area for endangered species, even though no endangered species has ever made Area Four previously. It is also easy to visualize a natural dune network similar to Ventura's Surfers Point growing in these areas, crisscrossed with boardwalks to facilitat to facilitate full public access to beautiful Oxnard State Beach, which should be internationally recognized as one of America's most beautiful public beaches. We also en network as an environmental education opportunity for visitors from all over the world, with restored greenbelt public park areas and other park amenities allowing picnic again and offering unmatched public views of the shoreline, the Santa Barbara Channel and Channel Islands National Park in the distance, scenic vistas that would no long wall-like artificial sand piles, and public and emergency vehicle access to the shoreline that is no longer constantly blocked or rendered hazardous in violation of the Amer (the "ADA").

Phase Six: Once the Beach Restoration Project is completed, City management and representatives of the Colony, the Hotel and the Oxnard Shores Neighborhood Counc parties, would meet at least periodically, perhaps quarterly, for the next five years to assess and correct any deficiencies identified in the City's implementation and manag Restoration Project. Assuming all interested parties agree, the time between those meetings could be extended after some agreed upon time frame.

OUR OBJECTIONS TO THE CITY PROPOSAL: Residents of the Colony objected to adoption of the City Proposal in my email transmitted to the City on October 1 the City Proposal in public comments by residents of the Colony at the October 17, 2024 public hearing before the City's Planning Commissio connection with and following the 2022 Workshop, to which we also submitted written and oral objections (collectively, the "Colony's Previous Objections"). As we state Objections, many of the Colony's residents, including the undersigned, reside within survey areas identified in the City Proposal. We are directly impacted by the City Pro overstate our opposition to its adoption by the City of Oxnard in its current form.

We hereby restate all of the Colony's Previous Objections and incorporate them into this document by reference, and set forth additional objections in Appendix 2 that we in the one week previously allowed for comments on the 540-page City Proposal.

The Coastal Development Permit applied for by the City in connection with its proposed sand management plan should not be granted and the City Proposal should not be Commission or the City Council or considered by the CCC unless and until the deficiencies identified in the Colony's Previous Objections and additional deficiencies iden and rectified, and the Colony Proposal is accepted by the City and implemented.

NEXT STEPS IF THE CITY DECLINES TO ACCEPT THE COLONY PROPOSAL:
If the City declines to accept the Colony Proposal, please provide the undersigned, our General Manager Garett Guenot and our outside counsel Glen Kulik, all signatories sufficient advance notice to register our complaints with the Planning Commission, the City Council and the CCC. In addition to the issues identified in this correspondence of the Colony, our counsel and I reserve our right in subsequent proceedings to raise objections to the City Proposal not identified in this email or in the Colony's Previous

As noted in the Colony's Previous Objections, in proceedings within the jurisdiction of the CCC such as the City Proposal and the Colony Proposal, it is a long established play a crucial role by giving voice to their concerns and by reserving the right to appeal projects that might significantly impact their property or the surrounding coastal en on proposals that could negatively affect their community and providing input on potential impacts to the local coastal landscape. We embrace that philosophy and, as nei by the City Proposal and as residents of the City, appreciate the opportunity to participate in the related deliberations and proceedings.

The residents of the Colony, as we have repeatedly communicated to the City in a variety of contexts, are anxious to work with the City, the Hotel and the CCC on this imp with its results and are delighted that the City initiated a sand management plan, despite the obvious and severe defects contained in the current draft of the City Proposal. management plans and beach restoration plans are desperately needed to protect and steward the natural resources of the Oxnard Shores area generally and Areas Three an

However, we believe equally firmly that such plans need to be created by working groups representing all affected parties. Such plans should not be drafted by City emplo from the neighbors of the affected areas as the City has prepared this City Proposal up to now. As noted not only in the Colony's Previous Objections, but also in the publi of the Oxnard Shores Neighborhood Council, over the course of the two years since the first draft of the City Proposal met significant opposition from the community, inc writing and in oral testimony by the Colony, the City failed to even once reach out to representatives of the Colony to discuss revisions to the Proposal that might have add concerns. We are relieved and pleased that the City appears to have begun to correct that failure. The stakes are too high for all of us not to collaborate closely.

RESERVATION OF RIGHTS RE MAD-4 AND OTHER SPECIAL BENEFIT ASSESSMENT DISTRICTS: Finally, as we have previously communicated to the C Oxnard Maintenance Assessment District 4 (MAD-4) to Areas Three and Four as set forth in the City Proposal and MAD-4's relevance to these proceedings, we also conti challenge the legality of the formation and ongoing operation of Oxnard Maintenance Assessment District 4, to which all owners in the Colony and Hotel pay annual asses formation and operation of other special benefit assessment districts throughout the City. We believe that the entire MAD-4 area, with certain very minor possible exceptio area. Even MAD-4's medians and parkways serve as the City's gateway to Oxnard State Beach, certainly one of the City's most valuable resources and all of these areas a general public. While we are not advocating an end to the MAD-4 assessments at least at this time, the beach, walkways, bike paths, fire lanes and greenbelt public park a beach parking, since their construction almost 40 years ago, have overwhelmingly been used by the general public. Their maintenance should never have been funded by believe the City may have relied excessively on consultants to operate such districts and utilized special benefit assessment funds for purposes not directly related to the fu

In connection with these concerns, as we have previously suggested to the City, we respectfully suggest that, similar to what the City recently did with the MAD-4 Oxnard the City should extend the Park's boundaries and General Fund financial support to include all of MAD-4's public park greenbelts, walkways, bike path, medians, parkway of the other park amenities — they are already indistinguishable to the general public — return the topography of Oxnard State Beach to its original, natural state and start working with the CCC and residents of the area to create a more environmentally-friendly, stable and sustainable beach area.

As part of this effort, the residents of the Colony are anxious to roll up our sleeves and collaborate with the City on this effort, working together to generate an effective sa beach restoration plan to keep the sand on the beach and to keep public access to the beach open and its magnificent public vistas available for all of Oxnard's residents an would result in a win-win-win for the City, the Hotel and all of the City's residents and visitors, including residents of the Colony.

As we previously communicated to the City, if we can work out an agreement regarding the sand management and beach restoration plans for Areas Three and Four, we w certain or all of the concerns identified above.

On behalf of all of our neighborhood's owners, residents and visitors, thank you very much to the City employees who worked hard to prepare the City Proposal, despite it flaws and failings.

I would appreciate hearing back from you at your earliest convenience to confirm your receipt of our concerns. If you disagree with any of the statements and suggestions communication, I would also appreciate if you would identify the statements or suggestions with which you disagree and the details regarding the disagreement. Please al any time to discuss our concerns and potential solutions. We are anxious to work together with the City and to achieve a mutually beneficial outcome for the City and for visitors.

We look forward to remaining in close touch with you as we move forward together with this plan.

In addition to the City addressees, I am also sending copies of these comments to California Assemblymember Steve Bennett, California Coastal Commission South Centr Hudson, Zachari Dunes at Mandalay Beach General Manager Glenda Rivera, and Walter Hagedohm and Diane Delaney, President and Vice President of the Oxnard Shore

Thank you again for your attention to our concerns. We look forward to continuing our collaboration going forward.

Respectfully submitted on behalf of The Colony at Mandalay Beach Owners Association,
Lorin Fife, Esq.
President
The Colony at Mandalay Beach Owners Association
2317 Vina Del Mar
Oxnard, CA 93035
lorinfife@gmail.com

Garett Guenot
General Manager
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2101 Vina Del Mar
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gguenot@pmpmanage.com

Glen Kulik, Esq.
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APPENDIX 1

ADDITIONAL PHOTOS AND CORRESPONDENCE ILLUSTRATING THE HISTORY OF THE CITY'S MISMANAGEMENT OF PRECIOUS RESOURCES IN AREAS THREE AND FOUR OF THE CITY PROPOSAL — 1981 TO THE PRESENT

Introduction — The following photos and correspondence supplement the materials we previously submitted to the City and provide a partial history of the Colony Deve Coastal Development Permit issued in 1981 to the present. They represent only a small percentage of the photos and documents we have accumulated over the years rega Development and the City's mismanagement of the area. Any capitalized terms not previously defined in the body of this email, shall have the meanings accorded subseq

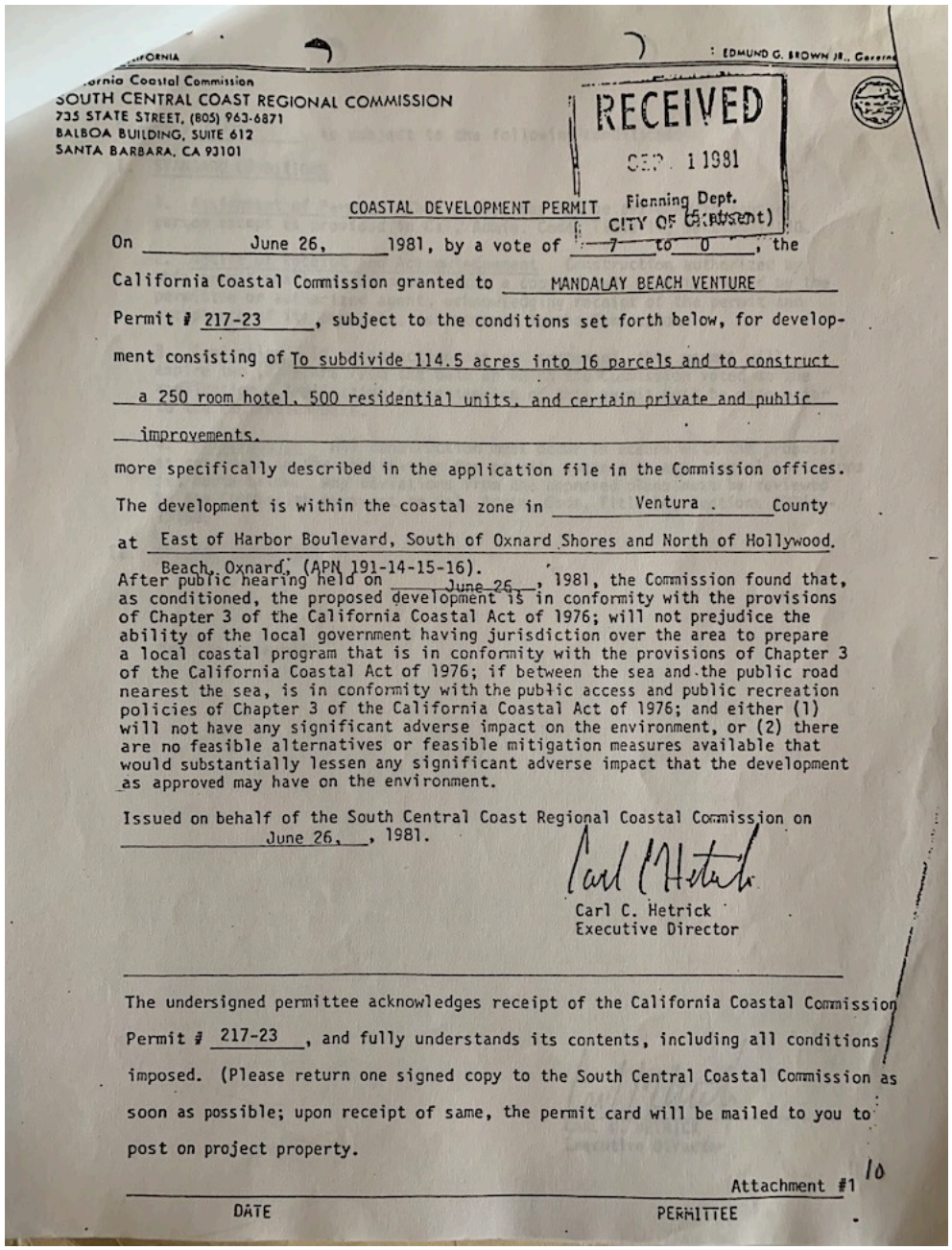
Our collection of documents and photos confirm that the only natural sand dunes in the Colony Development Area were in its far northwest section, between the Park and establishes that, fairly quickly after completion of the Colony Development in the mid-1980s, the City became frustrated by the cost of cleaning up windblown sand from City's Parks and Recreation Division apparently came up with the idea of building an artificial wind barrier on the flat sandy beach south of the Hotel, utilizing first sand b manufactured network of sand piles. These were not installed on the flat sandy beach for environmental purposes. Rather, the record is clear that City employees began ir sandy beach as a terribly misguided cost control measure.

The photos and correspondence illustrate that the City began planting and nurturing non-native, invasive vegetation like myoporum and iceplant, along with irrigation syst growth, in the Colony Development Area by 1986, only a year after completion of the Colony Development. The correspondence is quite clear that the City planted non-r built the sand piles in the area, because somebody on the City staff thought they would block the windblown sand, notwithstanding contemporaneous protests from the Co that this initiative makes absolutely no sense in retrospect. Whatever its staff thought at the time, the City clearly failed to take into account the aggressive, invasive tende myoporum to overwhelm any native California vegetation that might be introduced naturally to the area. The City also clearly failed to consider the myriad ways in which cleanup costs would violate its own Local Coastal Plan among other applicable laws, as illustrated in Appendix 2 to this email.

The City's sand pile project, which apparently never received any development permit, then spun ever more wildly out of control. The sand piles overwhelmed the area, d Amenities, blocking pedestrian and emergency vehicle access to large areas of the beach, blocking public views of the shoreline from the Park and Park Amenities, and ma problem even worse. For years now, loose sand from the sand piles has avalanched onto and blocked the ADA-protected pedestrian and emergency vehicle vertical access the pedestrian and bicycle paths through the Colony Development Area into dangerous slip-and-fall, trip hazard obstacle courses during the slightest breeze.

We hope that the City staff and the CCC find this record as mortifying as we, the residents who have lived with the City's mismanagement for decades, find it horrifying.

June 26, 1981 – **Coastal Development Permit for Mandalay Beach Venture [the Colony Development], Permit # 217-23**.



…ornia Coastal Commission
SOUTH CENTRAL COAST REGIONAL COMMISSION
735 STATE STREET, (805) 963-6871
BALBOA BUILDING, SUITE 612
SANTA BARBARA, CA 93101

EDMUND G. BROWN JR., Governor

RECEIVED
SEP 1 1981
Planning Dept.
CITY OF OXNARD

COASTAL DEVELOPMENT PERMIT (Existing)

On June 26, 1981, by a vote of 7 to 0, the California Coastal Commission granted to MANDALAY BEACH VENTURE Permit # 217-23, subject to the conditions set forth below, for development consisting of To subdivide 114.5 acres into 16 parcels and to construct a 250 room hotel, 500 residential units, and certain private and public improvements.

more specifically described in the application file in the Commission offices.

The development is within the coastal zone in Ventura County at East of Harbor Boulevard, South of Oxnard Shores and North of Hollywood Beach, Oxnard, (APN 191-14-15-16).

After public hearing held on June 26, 1981, the Commission found that, as conditioned, the proposed development is in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976; will not prejudice the ability of the local government having jurisdiction over the area to prepare a local coastal program that is in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976; if between the sea and the public road nearest the sea, is in conformity with the public access and public recreation policies of Chapter 3 of the California Coastal Act of 1976; and either (1) will not have any significant adverse impact on the environment, or (2) there are no feasible alternatives or feasible mitigation measures available that would substantially lessen any significant adverse impact that the development as approved may have on the environment.

Issued on behalf of the South Central Coast Regional Coastal Commission on June 26, 1981.

Carl C. Hetrick
Executive Director

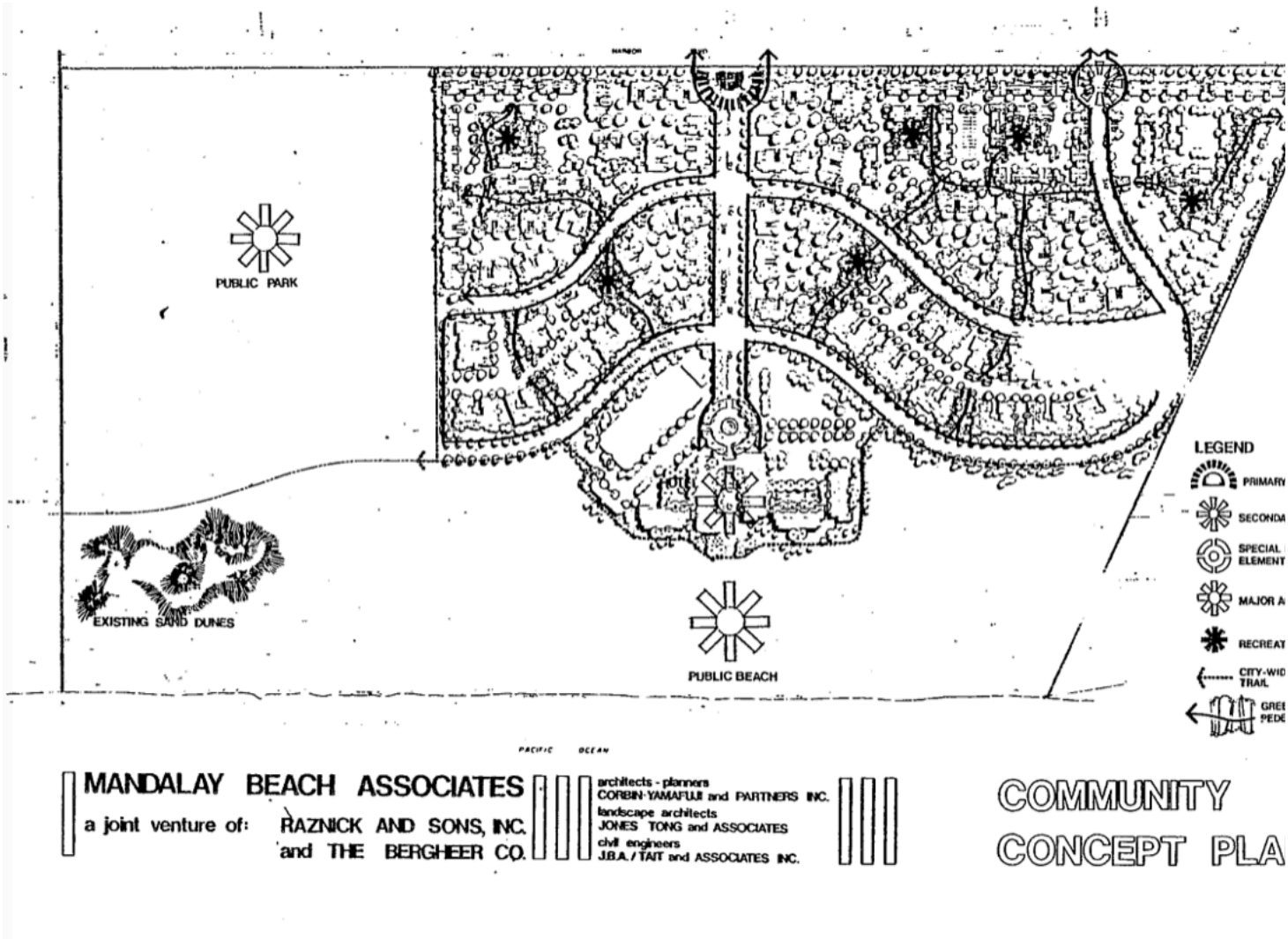
The undersigned permittee acknowledges receipt of the California Coastal Commission Permit # 217-23, and fully understands its contents, including all conditions imposed. (Please return one signed copy to the South Central Coastal Commission as soon as possible; upon receipt of same, the permit card will be mailed to you to post on project property.

Attachment #1 10

DATE PERMITTEE

One of the conditions to the approval of the Colony Development on page 11 is to *"**remove existing fill from Lot 14 and restore/regrade the lot to a similar condition for beaches**."* [Emphasis added.] **By the completion of the Colony and the Hotel in 1985, the developers of the Colony Development restored the entire beach area, o extreme northwest corner of the Colony Development, to its original natural condition as a flat sandy beach.** *"Condition 79 further requires that the [developers] s establishment of a maintenance district [MAD-4] to assess properties in the subdivision for expenses of maintaining public landscaping and beach areas commensurate w properties…."* On page 15, it admits: *"According to the EIR, the majority of the existing **vegetation on the site consists of various weed species**."* [Emphasis added.] Cle any endangered plant species anywhere in the Colony Development. *"**Various aquatic and land birds frequent the site but no rare or endangered species are reported t existing site was filled with the deposition material from the Mandalay Bay development east of Harbor Boulevard."*** [Emphasis added.] **Deposition material dredged development project is certainly not something that the City or the CCC would have permitted in an environmentally sensitive habitat area**. *"Near the easterly b highest portion of the property reaches an elevation of some 32 feet. From this point, the majority of **the property slopes gently seaward…. The most prominent natural [sic] is the sand dune complex located at the northwest corner of the property. The peak elevation of the dunes reaches 24 feet."*** [This refers to the natural dune netwo shoreline. There were no dunes between the Colony or the Hotel and the shoreline.*] "**The dune area is visible from Harbor Boulevard along the northerly boundary of** 16. **No dunes are located south of the northern edge of the property.** On page 17, it provides, *"**The dedication of the greenbelt area with required landscaping will beach**…. Also, the open space character of the Lot 13 parkland will maintain views of an open space character with the predominant dunes farther to the west."* On page ***no need for sand replenishment or corrective measures for at least 50 years."*** [Emphasis Added.]. While the City's own LCP declares that no replenishment or corrective until 2031, by 1986 the City was impatient with the costs associated with cleaning up windblown sand and started building the sand piles as a potential solution to that pro

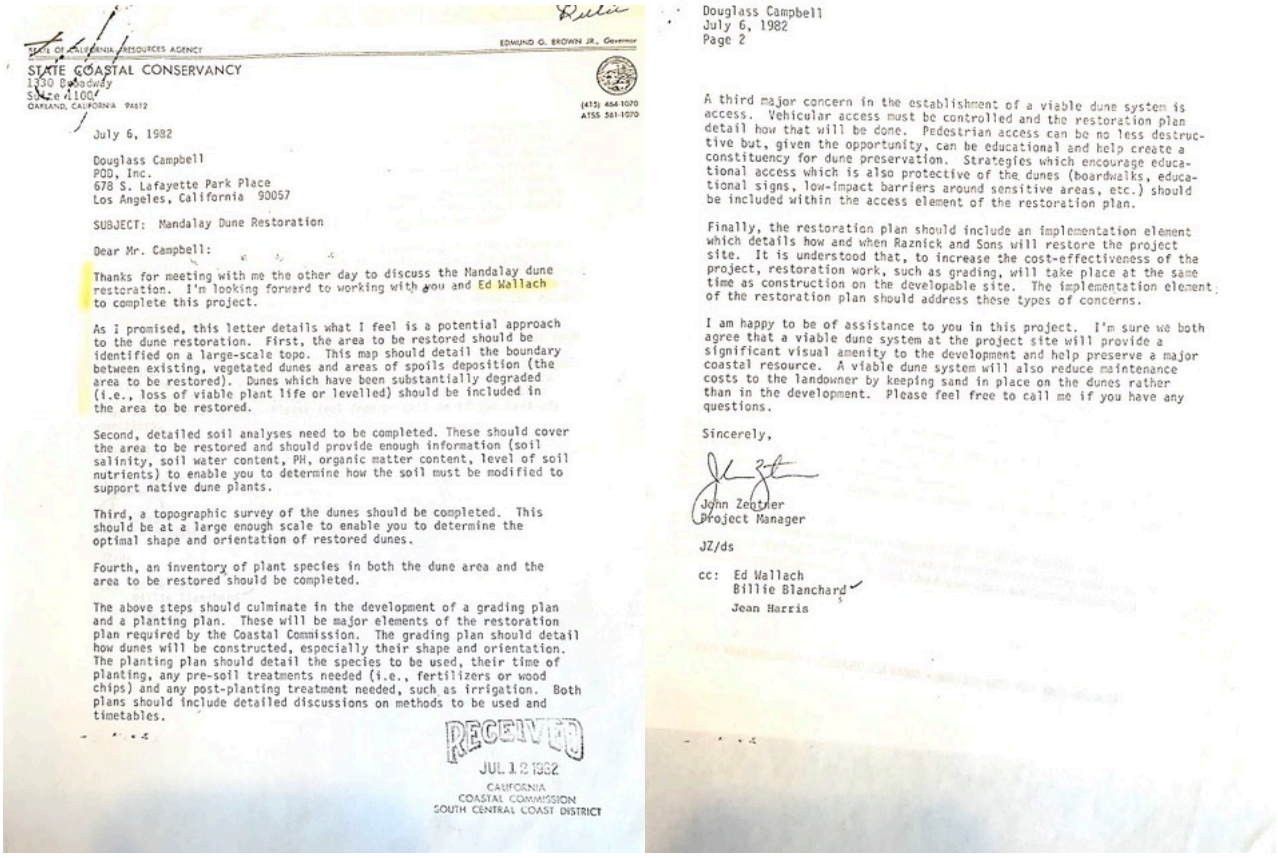
June 26, 1981 – Preliminary topographical planning map prepared by the developers of the Colony, the Hotel and the Park (Mandalay Beach Associates, a joint venture th Sons, Inc., and The Bergheer Co.) in connection with "Mandalay Beach Venture, Application No. 4-83-462-A." The map shows clearly that the only dunes in the area, as northwest area between the Park and the shoreline (the "Natural Dunes")(an area referred to as Lot 13). There are no sand dunes south of the Natural Dunes all the way to Colony Development (the area referred to as Lots 14 and 15). The reason the developers chose a confusing name for the Colony Development associated with Mandalay mile north of the Colony Development, rather than Oxnard State Beach, the beach which was actually part of the Colony Development Area, remains a mystery to us.



Approximately 1982 — Aerial view of the future site of the Park, the Colony and the Hotel, circa 1982, showing a complete lack of sand dune morphology in Areas 3 and except at the extreme northwest corner of the Colony Development Area. As discussed in City staff reports re Regional Permit 217-23, approved with conditions on June the construction of the Mandalay Bay development (east of Harbor Blvd.) inland of the future Colony Development site) were dumped on the beach in the Colony Develo improvements included "a bike path and pedestrian way; two 150 space public parking lots; dedication of open space beach area; and a greenbelt along the south property conditions included requirements for a dune/beach restoration plan for Lot 14 (the extreme northwest corner of the Colony Development Area)." It contains no mention o northwest corner of the future Colony.



July 6, 1982 – Letter from John Zentner, Project Manager, California State Coastal Conservancy, to Douglass Campbell, an environmental consultant, discussing the pend that became the Park, the Hotel and the Colony, the developers, and dune restoration related to the only dunes existing in the area at the time in the northwest corner of the Development. These dunes were not damaged by the Colony Development, so there were no dunes to restore, and the letter does not contemplate dune creation.



STATE OF CALIFORNIA—RESOURCES AGENCY
EDMUND G. BROWN JR., Governor

STATE COASTAL CONSERVANCY
1330 Broadway
Suite 1100
OAKLAND, CALIFORNIA 94612
(415) 464-1070
ATSS 561-1070

July 6, 1982

Douglass Campbell
POD, Inc.
678 S. Lafayette Park Place
Los Angeles, California 90057

SUBJECT: Mandalay Dune Restoration

Dear Mr. Campbell:

Thanks for meeting with me the other day to discuss the Mandalay dune restoration. I'm looking forward to working with you and Ed Wallach to complete this project.

As I promised, this letter details what I feel is a potential approach to the dune restoration. First, the area to be restored should be identified on a large-scale topo. This map should detail the boundary between existing, vegetated dunes and areas of spoils deposition (the area to be restored). Dunes which have been substantially degraded (i.e., loss of viable plant life or levelled) should be included in the area to be restored.

Second, detailed soil analyses need to be completed. These should cover the area to be restored and should provide enough information (soil salinity, soil water content, PH, organic matter content, level of soil nutrients) to enable you to determine how the soil must be modified to support native dune plants.

Third, a topographic survey of the dunes should be completed. This should be at a large enough scale to enable you to determine the optimal shape and orientation of restored dunes.

Fourth, an inventory of plant species in both the dune area and the area to be restored should be completed.

The above steps should culminate in the development of a grading plan and a planting plan. These will be major elements of the restoration plan required by the Coastal Commission. The grading plan should detail how dunes will be constructed, especially their shape and orientation. The planting plan should detail the species to be used, their time of planting, any pre-soil treatments needed (i.e., fertilizers or wood chips) and any post-planting treatment needed, such as irrigation. Both plans should include detailed discussions on methods to be used and timetables.

RECEIVED
JUL 12 1982
CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

Douglass Campbell
July 6, 1982
Page 2

A third major concern in the establishment of a viable dune system is access. Vehicular access must be controlled and the restoration plan detail how that will be done. Pedestrian access can be no less destructive but, given the opportunity, can be educational and help create a constituency for dune preservation. Strategies which encourage educational access which is also protective of the dunes (boardwalks, educational signs, low-impact barriers around sensitive areas, etc.) should be included within the access element of the restoration plan.

Finally, the restoration plan should include an implementation element which details how and when Raznick and Sons will restore the project site. It is understood that, to increase the cost-effectiveness of the project, restoration work, such as grading, will take place at the same time as construction on the developable site. The implementation element of the restoration plan should address these types of concerns.

I am happy to be of assistance to you in this project. I'm sure we both agree that a viable dune system at the project site will provide a significant visual amenity to the development and help preserve a major coastal resource. A viable dune system will also reduce maintenance costs to the landowner by keeping sand in place on the dunes rather than in the development. Please feel free to call me if you have any questions.

Sincerely,

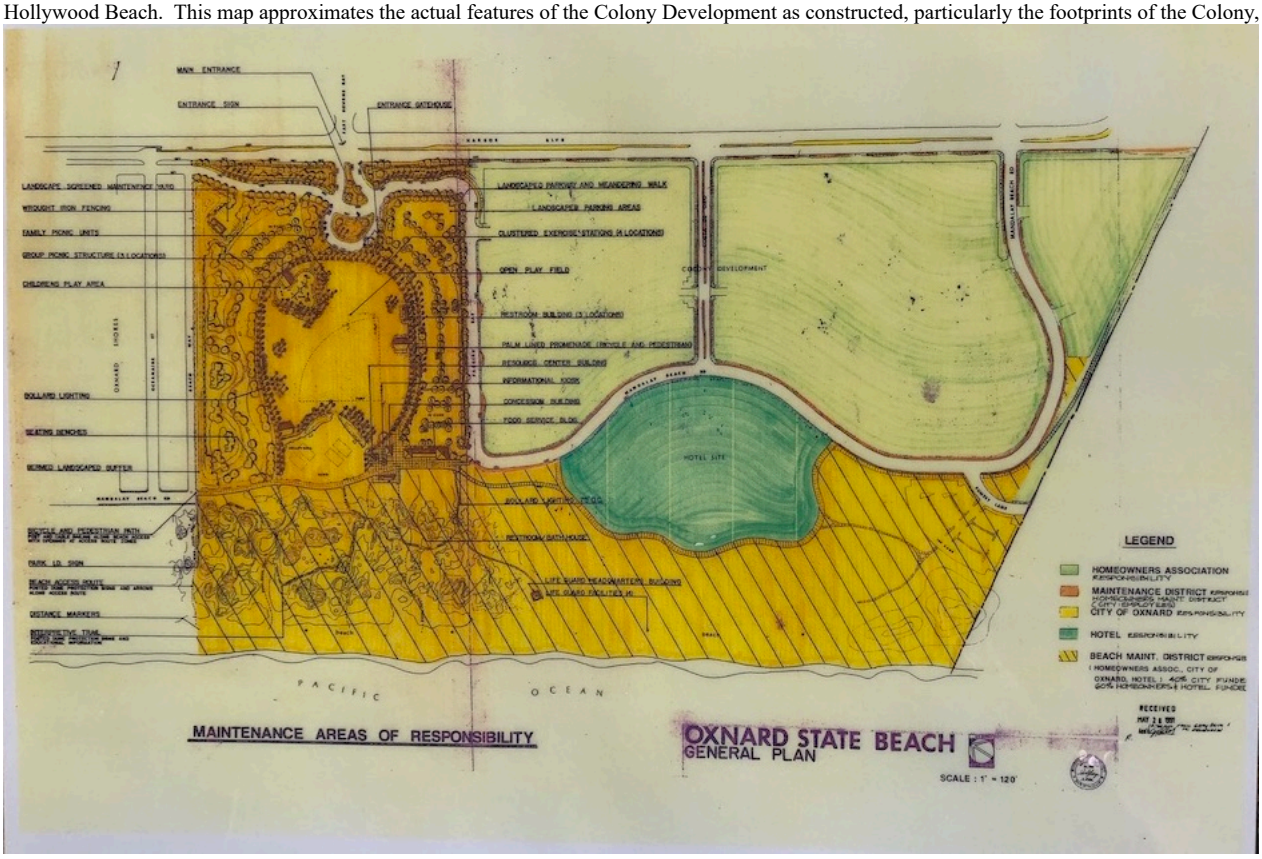
John Zentner
Project Manager

JZ/ds

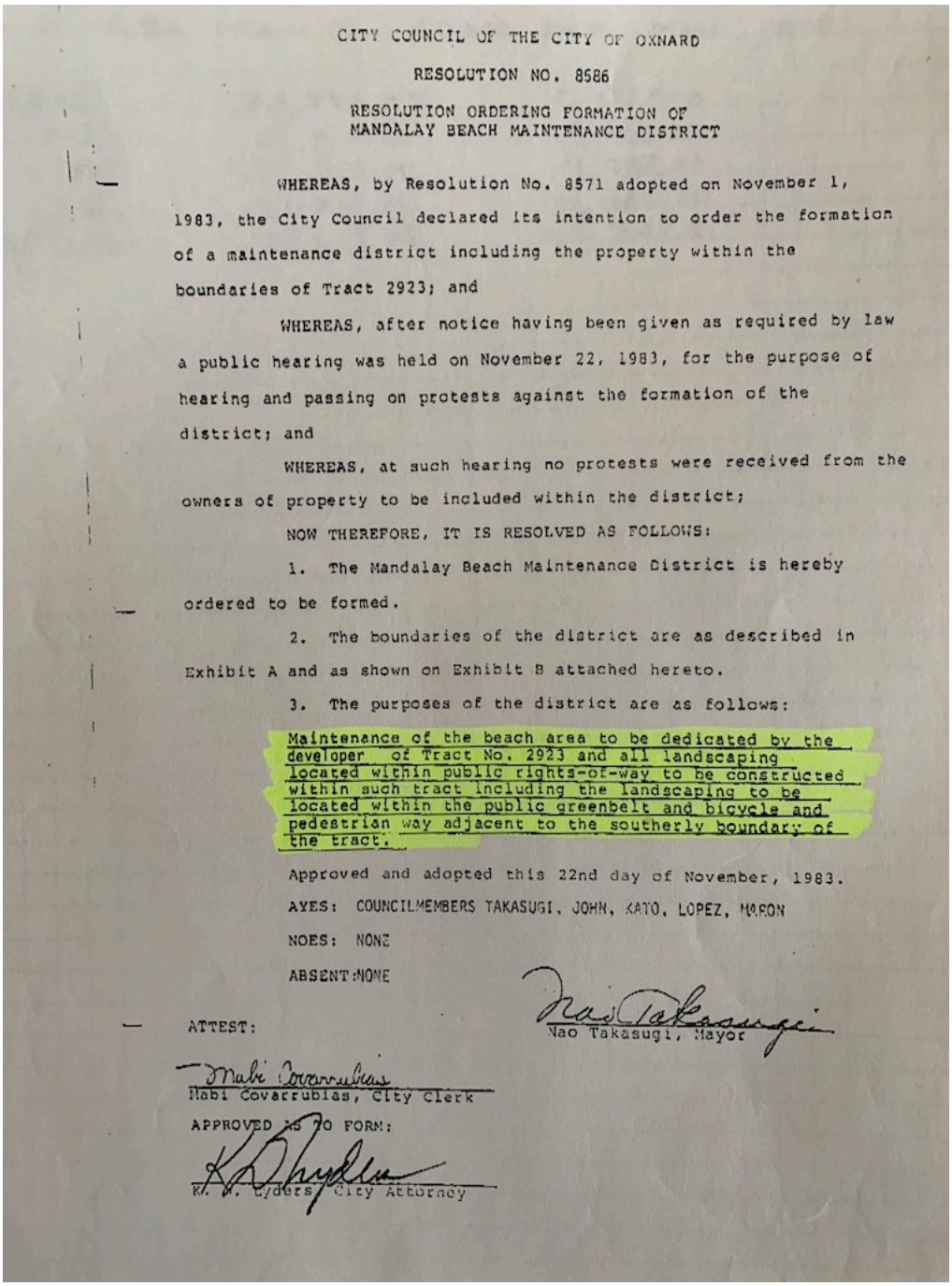
cc: Ed Wallach
Billie Blanchard
Jean Harris

Approximately 1983 – City of Oxnard Topographical Map of Oxnard State Beach General Plan (prepared in connection with dune restoration contemplated by the above is oriented so that east is at the top of the map) – note the almost total absence of sand dunes in the topography other than the northwest corner of the Colony Development

Hollywood Beach. This map approximates the actual features of the Colony Development as constructed, particularly the footprints of the Colony, the Hotel, the Park and



November 22, 1983 – Oxnard City Council Resolution 8586, expressly describing the area south of the Hotel and west of the Colony as a "public greenbelt."



CITY COUNCIL OF THE CITY OF OXNARD

RESOLUTION NO. 8586

RESOLUTION ORDERING FORMATION OF
MANDALAY BEACH MAINTENANCE DISTRICT

WHEREAS, by Resolution No. 8571 adopted on November 1, 1983, the City Council declared its intention to order the formation of a maintenance district including the property within the boundaries of Tract 2923; and

WHEREAS, after notice having been given as required by law a public hearing was held on November 22, 1983, for the purpose of hearing and passing on protests against the formation of the district; and

WHEREAS, at such hearing no protests were received from the owners of property to be included within the district;

NOW THEREFORE, IT IS RESOLVED AS FOLLOWS:

1. The Mandalay Beach Maintenance District is hereby ordered to be formed.

2. The boundaries of the district are as described in Exhibit A and as shown on Exhibit B attached hereto.

3. The purposes of the district are as follows:

Maintenance of the beach area to be dedicated by the developer of Tract No. 2923 and all landscaping located within public rights-of-way to be constructed within such tract including the landscaping to be located within the public greenbelt and bicycle and pedestrian way adjacent to the southerly boundary of the tract.

Approved and adopted this 22nd day of November, 1983.

AYES: COUNCILMEMBERS TAKASUGI, JOHN, KATO, LOPEZ, MORON

NOES: NONE

ABSENT: NONE

Nao Takasugi, Mayor

ATTEST:

Mabi Covarrubias, City Clerk

APPROVED AS TO FORM:

K. A. Lyders, City Attorney

Approximately 1984 — Aerial views of Oxnard State Beach during construction of the Colony and the Hotel, showing a total lack of sand dune morphology in Area 4 an hugging dunes in Area 3 between the future Park and the shoreline, as well as sand piles at the northern edge of Hollywood Beach, presumably created by Hollywood Bea



sand north from in front of their homes.



1984 – Photo from near the shoreline across the flat sandy beach showing the first Colony structures under construction south of the site of the Hotel. There are no sand d



Summer of 1985 – View from a slope on the east side of Mandalay Beach Road looking towards the shoreline. In the first photograph, the sun is visible setting behind Sa
Channel Islands National Park. The several greenbelt public park areas south of the Hotel (the "Greenbelt"), the bike path and pedestrian walkways and other Park Ameni



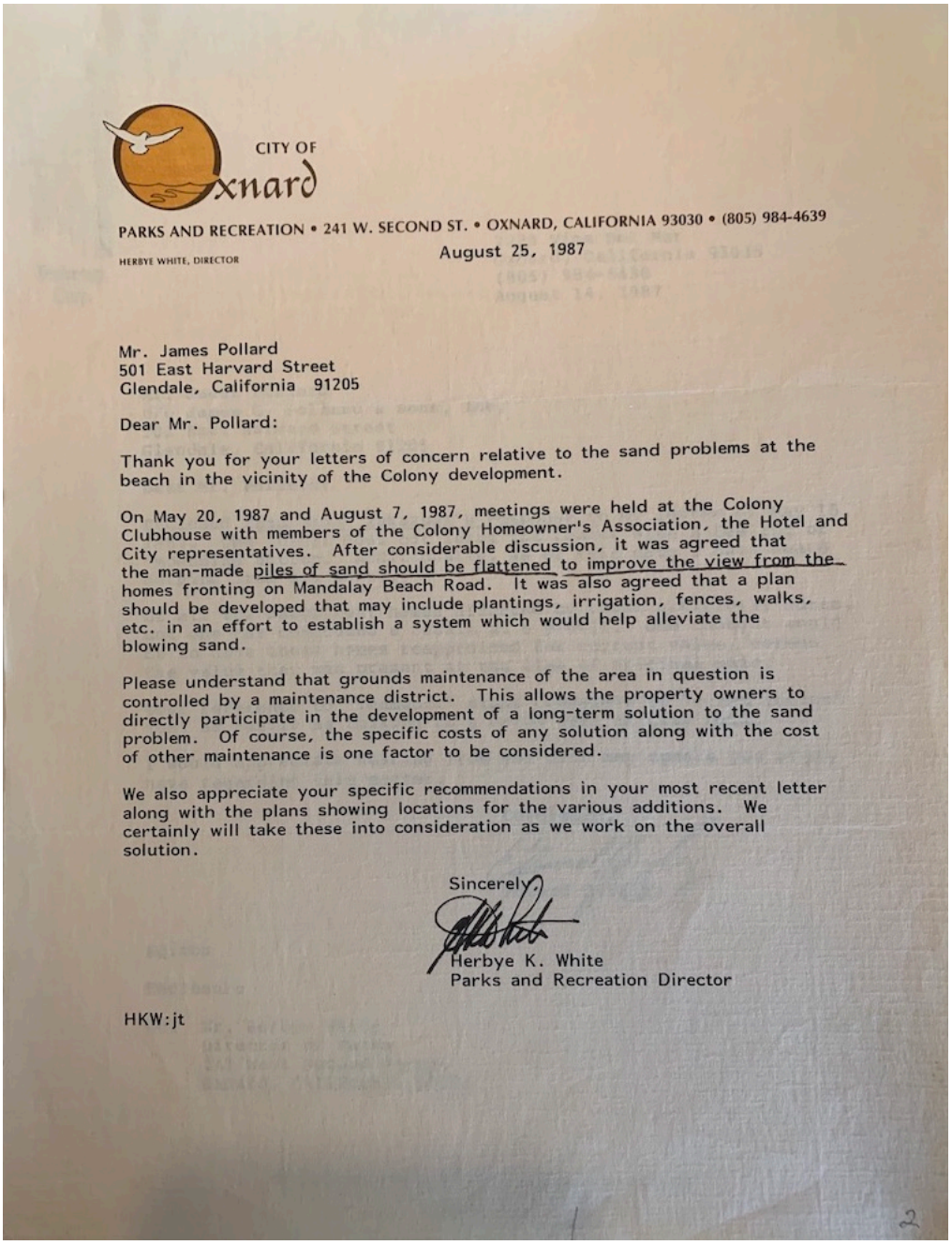


October 5, 1986 – Oxnard Shores parking lot at the southwest corner of the Colony Development Area and the intersection of Sunset Lane and Mandalay Beach Road shc except for sand dunes at the northern edge of Hollywood Beach, City planting of myoporum and iceplant on the beach and the grass-covered Greenbelt public park areas a of Sunset Lane, pedestrian and bicycle paths, and benches along the west side of the Central Walk, an ADA path, on the western edge of the largest greenbelt public park a right edge of the photograph. Today, those benches are buried under the City-manufactured artificial sand piles and the Greenbelt has been devoured by the sand piles mig Walk. Note that the palms have been pruned and skinned, which improves the trees' health by preventing pest infestations and reduces excess weight from dead material, vitality. It is also a public safety issue, keeping dead fronds from turning into dangerous missiles when the wind blows.





August 25, 1987 — A letter from Herbye K. White, City Parks and Recreation Director, acknowledging that representatives of the City, the Hotel and the Colony had agre of sand should be flattened" and that the City intended to install "plantings, irrigation, fences, walks" and other measures "to establish a system which would help alleviate



CITY OF Oxnard

PARKS AND RECREATION • 241 W. SECOND ST. • OXNARD, CALIFORNIA 93030 • (805) 984-4639

HERBYE WHITE, DIRECTOR

August 25, 1987

Mr. James Pollard
501 East Harvard Street
Glendale, California 91205

Dear Mr. Pollard:

Thank you for your letters of concern relative to the sand problems at the beach in the vicinity of the Colony development.

On May 20, 1987 and August 7, 1987, meetings were held at the Colony Clubhouse with members of the Colony Homeowner's Association, the Hotel and City representatives. After considerable discussion, it was agreed that the man-made piles of sand should be flattened to improve the view from the homes fronting on Mandalay Beach Road. It was also agreed that a plan should be developed that may include plantings, irrigation, fences, walks, etc. in an effort to establish a system which would help alleviate the blowing sand.

Please understand that grounds maintenance of the area in question is controlled by a maintenance district. This allows the property owners to directly participate in the development of a long-term solution to the sand problem. Of course, the specific costs of any solution along with the cost of other maintenance is one factor to be considered.

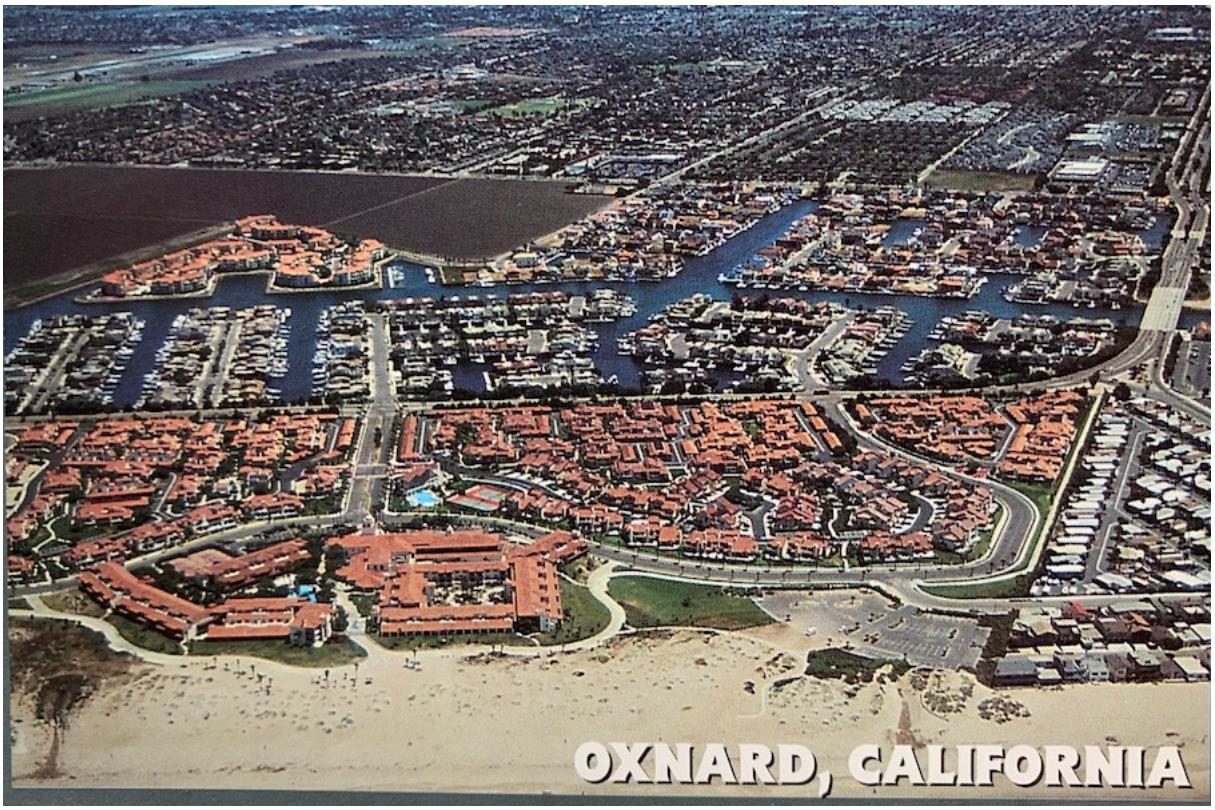
We also appreciate your specific recommendations in your most recent letter along with the plans showing locations for the various additions. We certainly will take these into consideration as we work on the overall solution.

Sincerely,

Herbye K. White
Parks and Recreation Director

HKW:jt

Approximately 1988 — Postcard showing aerial view of Oxnard State Beach, the Colony and the Hotel, showing flat sand beach between the dunes north of the Hotel an edge of Hollywood Beach in the lower right corner of the image. It also shows that the City-planted myoporum and iceplant have already dramatically expanded their foo Development Area, especially south (to the right) of the Hotel, and the City's windblown sand mitigation efforts have already destroyed a large area of the Greenbelt near



End of Installment 1 - Installment 2 will start with a photo from approximately 1990

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 2

1 message

Lorin Fife <lorinfife@gmail.com> Mon, Nov 4, 2024 at 5:00 PM
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Howlett <steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen Kulik <gkulik@kgswlaw.com>

Beginning of Installment 2:

Approximately 1990 – View of Oxnard State Beach, Greenbelt public park south of the Hotel and Oxnard Shores parking lot near the intersection of Sunset Lane and Mandalay Beach Road, already damaged by City tractors building sand piles and by myoporum growing out of control west of the parking lot. Please compare this photo to the photos from October 5, 1986.



Approximately 1990 — A closer view across the Central Walk of the beach south of the Hotel from the greenbelt public park area already damaged by this time by City tractors. City initiated sand piles are visible on the flat sandy beach. This photo illustrates the public view picnickers enjoyed from the greenbelt public park area towards the shoreline and Anacapa and Santa Cruz Islands in the distance across the Santa Barbara Channel. Compare this visual resource to later photos once the City buried the beach at this location with out of control artificial sand piles.



Approximately late 1990 — Benches on western side of Central Walk, showing City bulldozed artificial sand piles being initiated in background of first photo and City-planted iceplant along Central Walk in second photo, with Hotel in background.

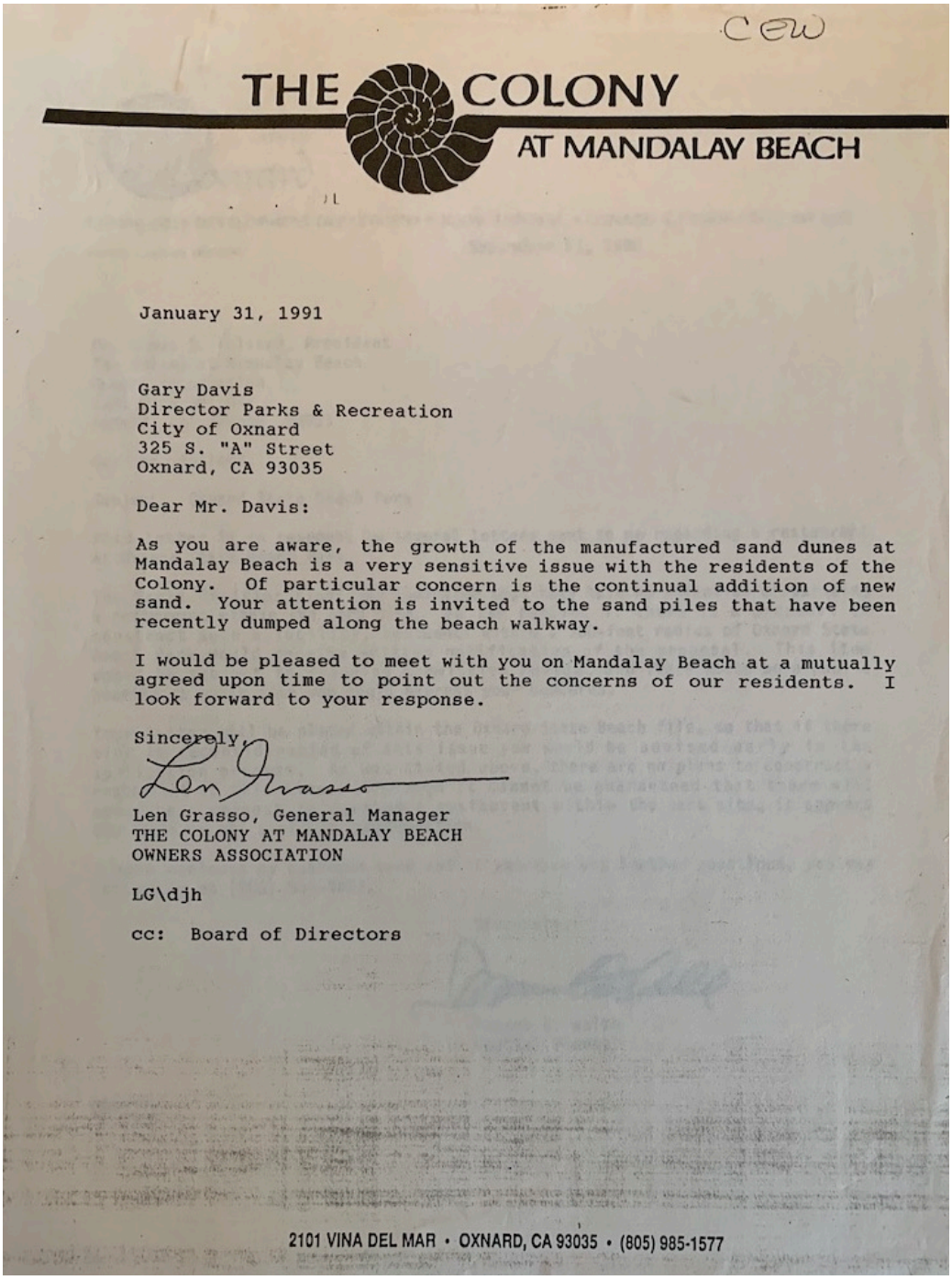




January 24, 1991 — By this time, the City had begun taking aggressive development measures to build barriers to windblown sand at the intersection of the Central Walk and the ADA access path to the beach. Note City-planted myoporum in the background behind a fence (later removed when the myoporum overwhelmed it) and a sand pile in the foreground with a City cone and tractor tracks that have also begun to destroy parts of the greenbelt public park across the Central Walk.



January 31, 1991 — Letter from Len Grasso, General Manager of the Colony at the time, complaining to the City's Director of Parks & Recreation about "the growth of the manufactured sand dunes" on Oxnard State Beach with the City engaging in "the continual addition of new sand," and calling the City's attention "to the sand piles that have been recently dumped along the beach walkway."



CEW

THE COLONY
AT MANDALAY BEACH

January 31, 1991

Gary Davis
Director Parks & Recreation
City of Oxnard
325 S. "A" Street
Oxnard, CA 93035

Dear Mr. Davis:

As you are aware, the growth of the manufactured sand dunes at Mandalay Beach is a very sensitive issue with the residents of the Colony. Of particular concern is the continual addition of new sand. Your attention is invited to the sand piles that have been recently dumped along the beach walkway.

I would be pleased to meet with you on Mandalay Beach at a mutually agreed upon time to point out the concerns of our residents. I look forward to your response.

Sincerely,

Len Grasso

Len Grasso, General Manager
THE COLONY AT MANDALAY BEACH
OWNERS ASSOCIATION

LG\djh

cc: Board of Directors

2101 VINA DEL MAR • OXNARD, CA 93035 • (805) 985-1577

Early 1991 – City employees pushing sand with tractors to create sand piles south of the Hotel. Note iceplant planted by City employees and benches and garbage can in the foreground subsequently buried under sand piles. This was all part of an ill-advised City effort to control windblown sand, along the concrete Central Walk.




MF
SOE



February 19, 1991 – A series of photos. Iceplant and hay bales positioned by City employees to help manufacture sand piles south of the Hotel to control windblown sand. Repositioned sand on both sides of the Central Walk ADA pathway. Note City tractor treads all along pedestrian and bicycle paths.







February 20, 1991 — City construction of sand piles with hay bales continues south of the Hotel, but sand piles are beginning to take shape and to block public views from the Greenbelt public park areas south of the Hotel. City tractors have already begun to destroy the grass (see foreground of first photo) and create footholds for the sand piles to migrate across the Central Walk.


'9 1 2 20


'91 2 20

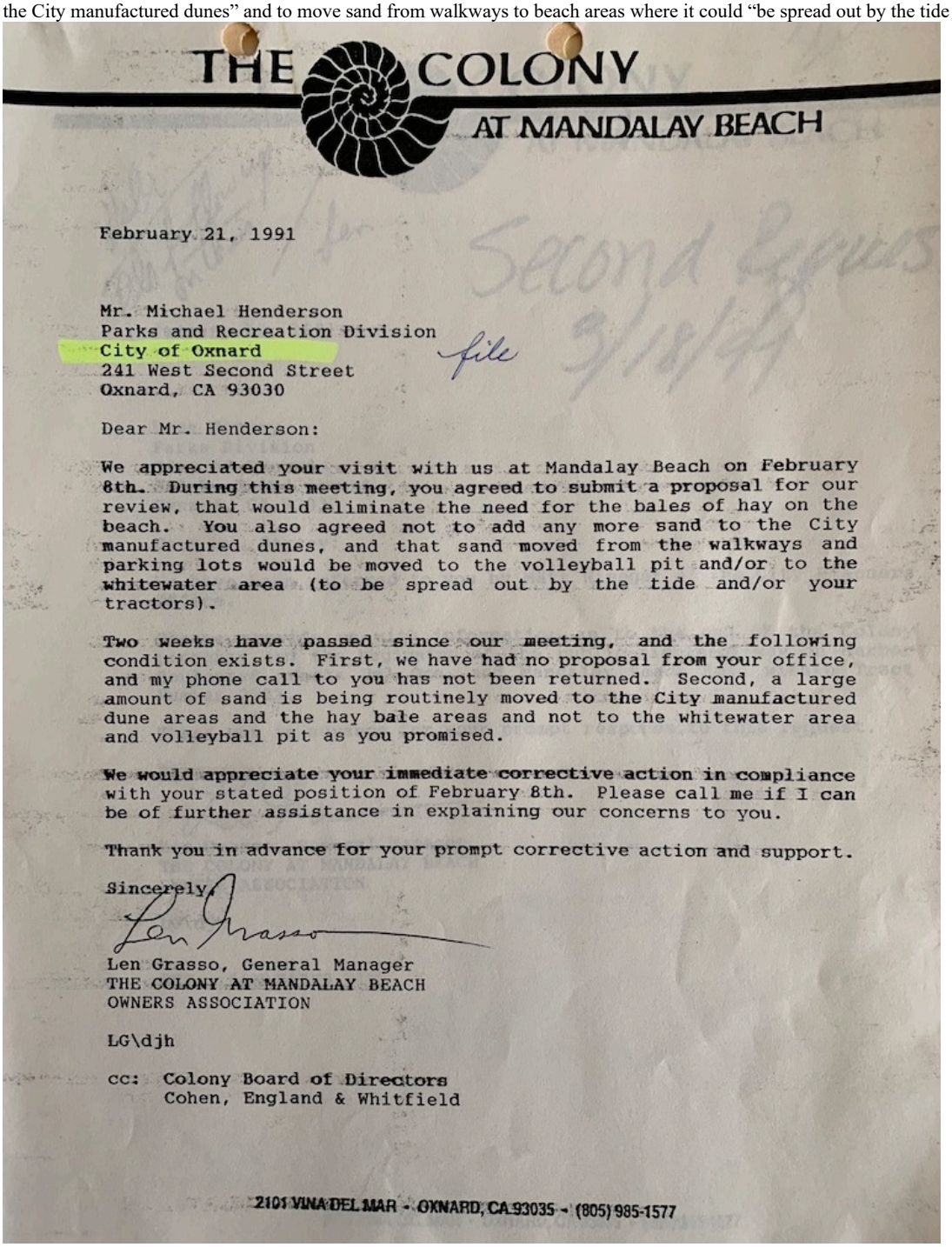






February 21, 1991 — Letter from Len Grasso, General Manager, to Michael Henderson with the City's Parks and Recreation Division, asking the City to eliminate "the bales of hay on the beach," complaining about Mr. Henderson's failure to respond to phone messages and to follow through on a promised

"proposal," presumably about removing the City-manufactured artificial sand piles. The letter also confirms that the City agreed "not to add any more sand to the City manufactured dunes" and to move sand from walkways to beach areas where it could "be spread out by the tide and/or" City tractors.



THE COLONY
AT MANDALAY BEACH

February 21, 1991

Mr. Michael Henderson
Parks and Recreation Division
City of Oxnard
241 West Second Street
Oxnard, CA 93030

file

Dear Mr. Henderson:

We appreciated your visit with us at Mandalay Beach on February 8th. During this meeting, you agreed to submit a proposal for our review, that would eliminate the need for the bales of hay on the beach. You also agreed not to add any more sand to the City manufactured dunes, and that sand moved from the walkways and parking lots would be moved to the volleyball pit and/or to the whitewater area (to be spread out by the tide and/or your tractors).

Two weeks have passed since our meeting, and the following condition exists. First, we have had no proposal from your office, and my phone call to you has not been returned. Second, a large amount of sand is being routinely moved to the City manufactured dune areas and the hay bale areas and not to the whitewater area and volleyball pit as you promised.

We would appreciate your immediate corrective action in compliance with your stated position of February 8th. Please call me if I can be of further assistance in explaining our concerns to you.

Thank you in advance for your prompt corrective action and support.

Sincerely,

Len Grasso

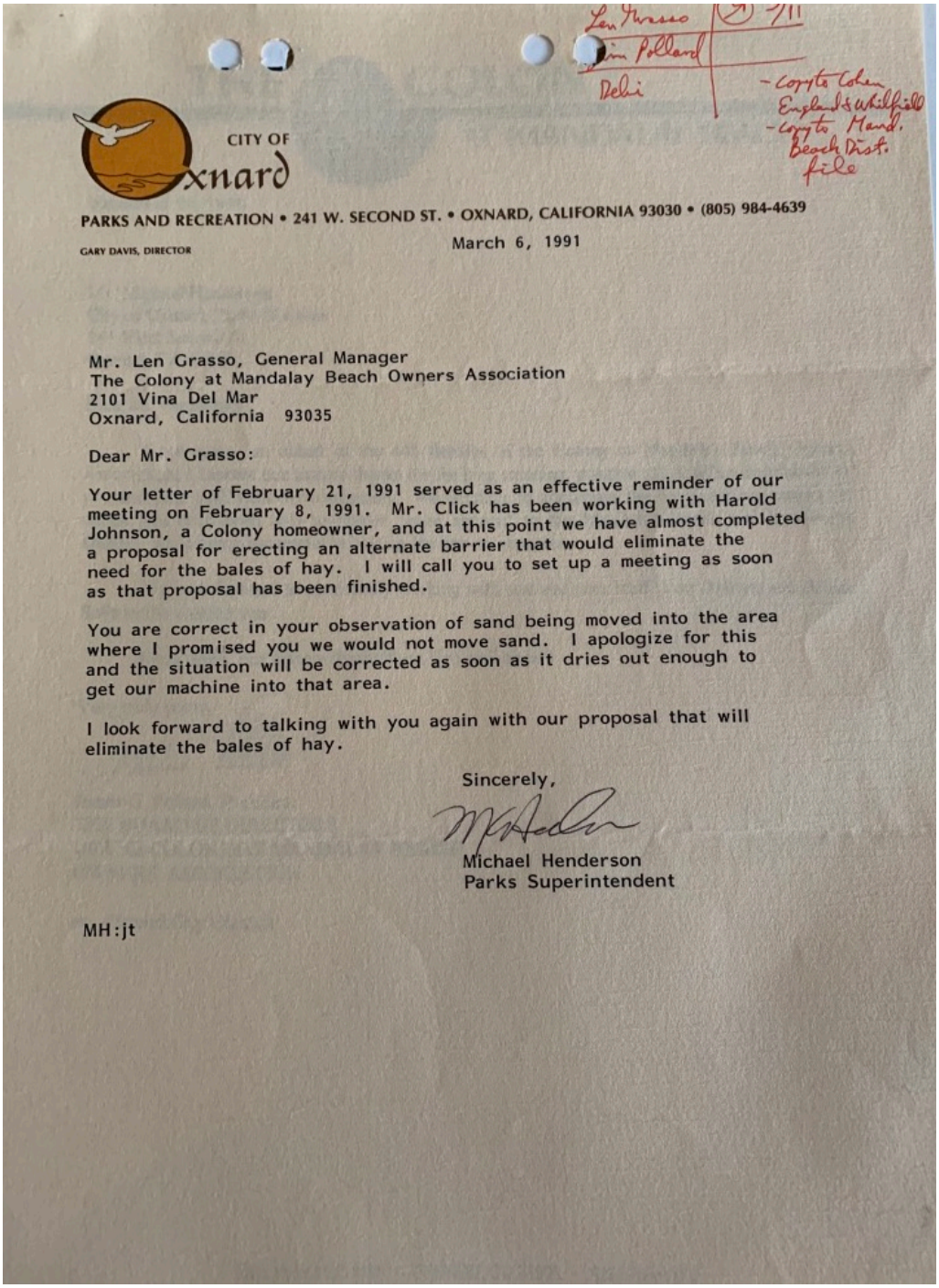
Len Grasso, General Manager
THE COLONY AT MANDALAY BEACH
OWNERS ASSOCIATION

LG\djh

cc: Colony Board of Directors
Cohen, England & Whitfield

2101 VINA DEL MAR - OXNARD, CA 93035 - (805) 985-1577

March 6, 1991 — Letter from Michael Henderson, City Parks Superintendent, to Len Grasso, Colony General Manager, two weeks later, noting that the City had "almost completed a proposal for erecting an alternate barrier that would eliminate the need for the bales of hay." It adds, "You are correct in your observation of sand being moved into the area where I promised you we would not move sand. I apologize for this and the situation will be corrected as soon as it dries out enough to get our machine into that area." The City never removed the bales of hay or the growing sand piles.



Len Grasso
Jim Pollard
Debi

- copy to Cohen England & Whitfield
- copy to Mand. Beach Dist. file

CITY OF Oxnard

PARKS AND RECREATION • 241 W. SECOND ST. • OXNARD, CALIFORNIA 93030 • (805) 984-4639

GARY DAVIS, DIRECTOR

March 6, 1991

Mr. Len Grasso, General Manager
The Colony at Mandalay Beach Owners Association
2101 Vina Del Mar
Oxnard, California 93035

Dear Mr. Grasso:

Your letter of February 21, 1991 served as an effective reminder of our meeting on February 8, 1991. Mr. Click has been working with Harold Johnson, a Colony homeowner, and at this point we have almost completed a proposal for erecting an alternate barrier that would eliminate the need for the bales of hay. I will call you to set up a meeting as soon as that proposal has been finished.

You are correct in your observation of sand being moved into the area where I promised you we would not move sand. I apologize for this and the situation will be corrected as soon as it dries out enough to get our machine into that area.

I look forward to talking with you again with our proposal that will eliminate the bales of hay.

Sincerely,

Michael Henderson
Parks Superintendent

MH:jt

March 9, 1991 — Another series of photos. The City, while it was manufacturing artificial sand piles south of the Hotel, was also dumping sand piles into the area north of the Hotel and southwest of the Park, where the City was also planting iceplant in vast quantities, and destroying parts of the Greenbelt public park with tractors. The City's apparent solution to the hay bales was to break some of them up so that they just added to the height and volume of the sand piles. Also visible in some photos, the City had begun installing an irrigation system in the sand piles to water the non-native, invasive iceplant, and a fence in a vain attempt to control the myoporum. It also shows sand staged on the western edge of the bike path and ADA pedestrian walkway west of the Hotel, which less than a week later would cover those paths.








9 3 9





End of Installment 2 - Installment 3 will begin with photos dated March 12, 1991

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Re: Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 3

1 message

Lorin Fife <lorinfife@gmail.com> Mon, Nov 4, 2024 at 5:16 PM
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Howlett <steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen Kulik <gkulik@kgswlaw.com>

Beginning of Installment 3:

March 12, 1991 — Another series of photos. The City has added new additional hay bales to the sand piles south of the Hotel, while City tractors have flattened some of the beach west of the Hotel while leaving a few sand piles even in that area of the beach.











March 14 and 15, 1991 — Another series of photos showing sand blocking the recently cleaned ADA walkway and a portion of the bike path west of the Hotel and, then one day later, an illustration of why moving excess sand just west of the Colony Development without flattening it or letting the shoreline surf flatten it will just exacerbate the windblown sand problem that the City intended the sand piles to resolve. Also note the height of the grass slopes on the Hotel property, already elevated by windblown sand, and compare that height to today.





March 19, 1991 — A view showing that the City tractors working on the sand piles have progressed in their destruction of the southern edge of the Greenbelt public park near the parking lot, the myoporum beyond the parking lot has spread and the iceplant is taking hold, but the beach is still relatively flat. And the City continues to add hay bales and sand, exacerbating the sand pile problem. City-mandated bicycle racks along the bike path are beginning to disappear near the Hotel under the sand piles.







March 20, 1991 – Another series of photos. City tractors pushing sand onto additional hay bales added to create taller sand piles south of the Hotel and dumping additional sand north of the Hotel.







March 26 and 27, 1991 – Another series of photos. The City has placed more hay bales onto the sand piles. The sand piles are beginning to stretch towards the beach and to bury the bicycle racks and cause flooding on the bike and pedestrian paths around the Hotel and the Central Walk. Today, such puddles can serve as a breeding area for invasive virus-carrying Aedes mosquitoes. The Central Walk as it approaches the parking lot south of the Hotel now has sand on both sides.


9 3 26


9 3 26


'91 3 26


'91 3 26




'91 3 28





End of Installment 3 - Next Installment will begin on April 1, 1991

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

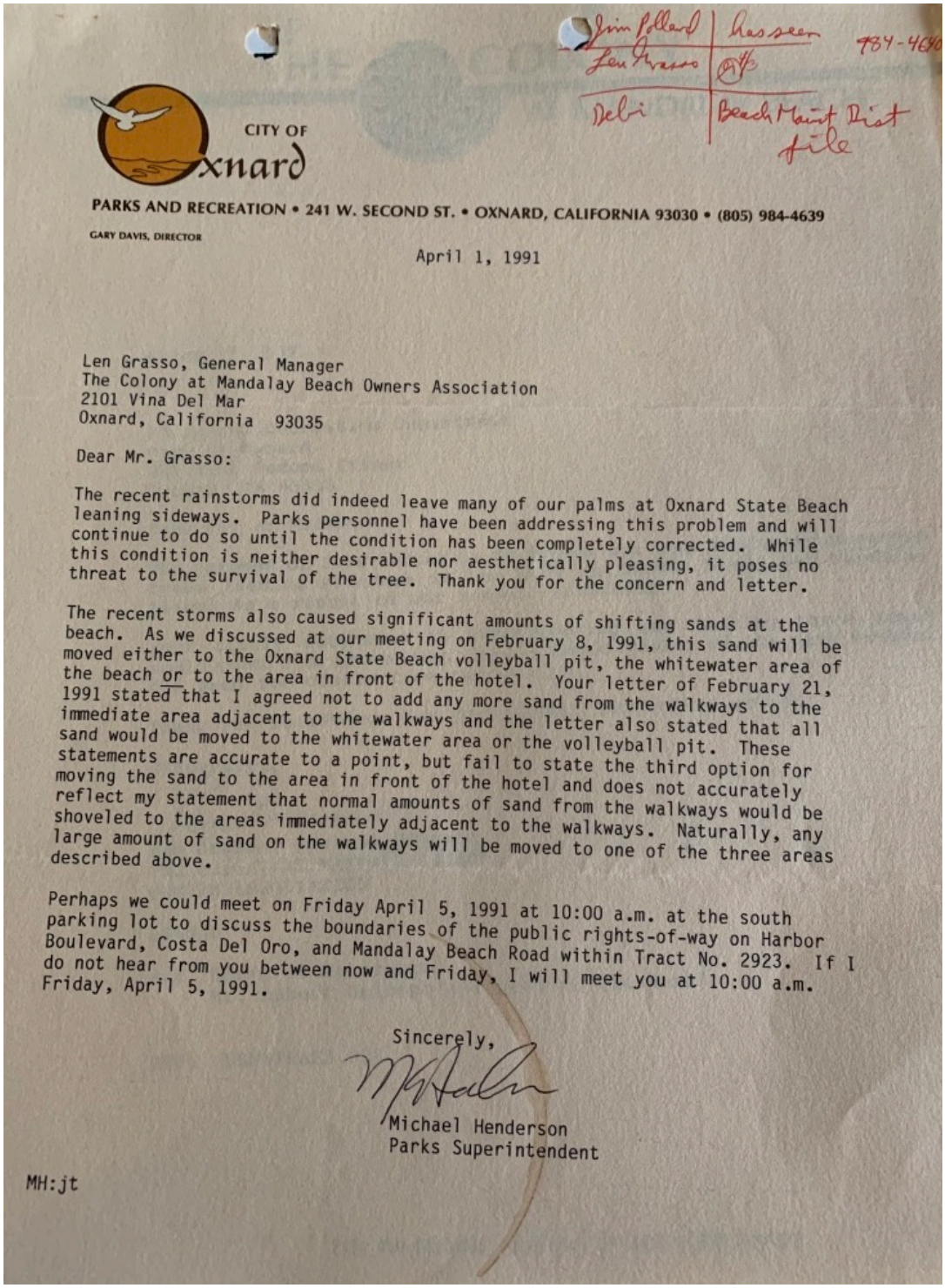
Re: Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 4

1 message

Lorin Fife <lorinfife@gmail.com> Mon, Nov 4, 2024 at 5:25 PM
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Howlett <steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen Kulik <gkulik@kgswlaw.com>

Beginning of Installment 4

April 1, 1991 — Another letter from Michael Henderson, City Parks Superintendent, once again promising Len Grasso, General Manager of the Colony, that the sand piles and “any large amount of sand on the walkways” would be moved back out onto the beach. It was never moved back out onto the beach as far as anyone from the Colony could tell.



Jim Pollard | has seen 984-4639
Len Grasso | [illegible]
Debi | Beach Maint Dist file

CITY OF Oxnard

PARKS AND RECREATION • 241 W. SECOND ST. • OXNARD, CALIFORNIA 93030 • (805) 984-4639

GARY DAVIS, DIRECTOR

April 1, 1991

Len Grasso, General Manager
The Colony at Mandalay Beach Owners Association
2101 Vina Del Mar
Oxnard, California 93035

Dear Mr. Grasso:

The recent rainstorms did indeed leave many of our palms at Oxnard State Beach leaning sideways. Parks personnel have been addressing this problem and will continue to do so until the condition has been completely corrected. While this condition is neither desirable nor aesthetically pleasing, it poses no threat to the survival of the tree. Thank you for the concern and letter.

The recent storms also caused significant amounts of shifting sands at the beach. As we discussed at our meeting on February 8, 1991, this sand will be moved either to the Oxnard State Beach volleyball pit, the whitewater area of the beach or to the area in front of the hotel. Your letter of February 21, 1991 stated that I agreed not to add any more sand from the walkways to the immediate area adjacent to the walkways and the letter also stated that all sand would be moved to the whitewater area or the volleyball pit. These statements are accurate to a point, but fail to state the third option for moving the sand to the area in front of the hotel and does not accurately reflect my statement that normal amounts of sand from the walkways would be shoveled to the areas immediately adjacent to the walkways. Naturally, any large amount of sand on the walkways will be moved to one of the three areas described above.

Perhaps we could meet on Friday April 5, 1991 at 10:00 a.m. at the south parking lot to discuss the boundaries of the public rights-of-way on Harbor Boulevard, Costa Del Oro, and Mandalay Beach Road within Tract No. 2923. If I do not hear from you between now and Friday, I will meet you at 10:00 a.m. Friday, April 5, 1991.

Sincerely,

Michael Henderson
Parks Superintendent

MH:jt

April 24, 1991 — A tractor, presumably hired by Hollywood Beach homeowners, bulldozing sand from in front of Hollywood Beach homes onto artificial sand piles near the southern end of the parking lot south of the Hotel.



March 8, 1992 — A year later, another series of photos. In the first photo, benches facing the bike path near the Hotel. Public benches on the Central Walk and bike path were all eventually devoured by the sand piles. Second photo, the junction where the Central Walk meets the ADA pedestrian path to the beach from the parking lot south of the Hotel. Greenbelt areas in left of photo stripped of grass, sand flattened adjacent to the Central Walk, and City-planted iceplant and myoporum now growing out of control, watered by irrigation system visible in some photographs. Public view of Anacapa Island and the shoreline now mostly blocked from greenbelt public park area.




'92 3 8


'92 3 8


'92 3 8

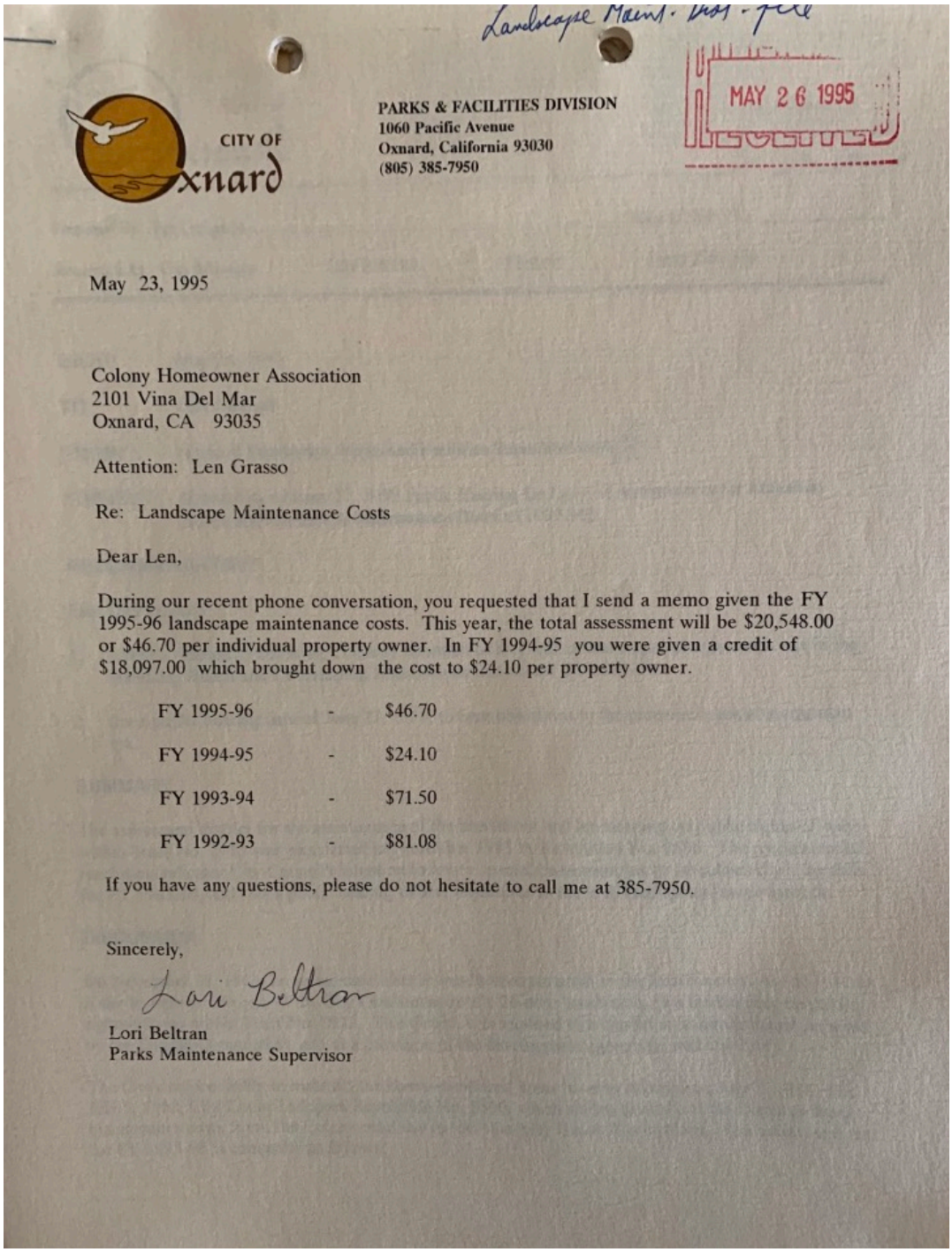

'92 3 8


'92 3 27


'92 3 27



May 23, 1995 – Letter from Lori Beltran, Parks Maintenance Supervisor, to the Colony HOA, setting forth a 4-year history of MAD-4 assessments which illustrates that for some reason the City lowered these assessments during the first three years of that period. The 1995-96 assessments were frozen in perpetuity by California statewide Proposition 218, which froze all special benefit assessment district assessments at 1996 levels without a vote of the residents.



Landscape Maint. Dist. - file

CITY OF Oxnard

PARKS & FACILITIES DIVISION
1060 Pacific Avenue
Oxnard, California 93030
(805) 385-7950

MAY 26 1995

May 23, 1995

Colony Homeowner Association
2101 Vina Del Mar
Oxnard, CA 93035

Attention: Len Grasso

Re: Landscape Maintenance Costs

Dear Len,

During our recent phone conversation, you requested that I send a memo given the FY 1995-96 landscape maintenance costs. This year, the total assessment will be $20,548.00 or $46.70 per individual property owner. In FY 1994-95 you were given a credit of $18,097.00 which brought down the cost to $24.10 per property owner.

FY 1995-96	-	$46.70
FY 1994-95	-	$24.10
FY 1993-94	-	$71.50
FY 1992-93	-	$81.08

If you have any questions, please do not hesitate to call me at 385-7950.

Sincerely,

Lori Beltran

Lori Beltran
Parks Maintenance Supervisor

Approximately 2015 — Fast forward almost 20 years. Another series of photos. The sand piles are twice the height of any human, the iceplant has completely taken over on both sides of the ADA pedestrian access path to the beach, creating a sand canyon poised to unleash blizzarding avalanches of loose sand onto the walkway every afternoon when the sundowner breezes start to blow. Typically, a few weeks later, a City tractor would enter the sand canyon, pushing the drifting sand on the walkways back onto a wall of the sand canyon, from which a gentle breeze the next afternoon would blow it back onto the walkway. By 2015, myoporum was more than 20' tall and used routinely for illegal activities by drug users, "campers" and folks wanting to shoot off fireworks. At this time, the public park Greenbelt remains, but the sand piles are already encroaching across the Central Walk, aided by City tractors which regularly drive onto the vegetation. Most public views of the beach and Channel Islands National Park beyond from the Greenbelt area are completely blocked by the sand piles.







End of Installment 4 - Installment 5 will begin on February 20, 2016

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Re: Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 5

1 message

Lorin Fife <lorinfife@gmail.com>
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Ho
<steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen K

Beginning of Installment 5

February 20, 2016 — Sitting on a picnic blanket at this point on what used to be a greenbelt when the developers of the Colony Development dedicated it to the stewards or group of friends from downtown Oxnard could have picnicked on a beautiful lawn with a magnificent view of a flat beach sloping gradually down to the surf with Santa Channel Islands National Park beyond. Please compare this photo to a photo earlier in this collection from 1990, taken from almost exactly the same spot. By the date of Greenbelt was disappearing and the view was totally blocked by a wall of sand approaching 20 feet in height, all of it created by City tractors manufacturing sand piles. O earlier, the City had installed irrigation systems to water the iceplant. These irrigation systems were also buried by the sand. There were also sandbags planted along the p in a vain effort to keep the sand piles from collapsing onto the walkway. They didn't work, so the City just left them to disintegrate and add to the mess. Once upon a tim photos, there were benches for tired pedestrians to rest here. Now most pedestrians don't even try to navigate this area, and the benches are buried under the sand piles.





By 2016, even the garbage cans were getting buried under the sand piles. The benches were gone.



This is supposed to be an ADA-compliant walkway accessible to our mobility-challenged neighbors.



And this is supposed to be an ADA-compliant main vertical access path from the parking lot south of the Hotel to the beach. At least you can follow the City tractor tread what the view looked like before the City starting building its sand piles.



There used to be a clear view of the beach from this parking lot. By 2016, the views were completely blocked by the sand piles. On the left, the sand has piled up inside t pushes even taller searching for sunlight. The iceplant also has grown up the sandpiles into the myoporum creating piles of iceplant into which a child could disappear. Th in the sand in the foreground. On the right of the photo, the iceplant and sand bury what used to be part of the Greenbelt.



The City has also mismanaged and neglected the landscaping around the parking lot, the public parkways and medians in the neighborhood. There aren't many locations a could picnic with a view of the ocean and a National Park. They used to have that picnic on the Greenbelt public park area south of the Hotel. By 2016, as a result of City was no longer possible.



At least some random wildflowers grow where the City let the sand accumulate and the bushes die.



March 25, 2016 — A City bulldozer finally makes it out to clear the sand from the Central Walk more than a month later than the preceding photos. The sand piles in the what used to be beautiful greenbelt visible in the photos from the 1980s. By 2016, not only could you no longer see the beach or the Channel Islands from the parking lot,

Hotel. But the iceplant is growing well.



June 24, 2016 — A lucky day for an emergency vehicle heading for the beach west of the Hotel. Most of the bike path had been cleared shortly before this photo. But the needed to drive half on the sidewalk.



End of Installment 5 - Installment 6 will begin with 2019

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Re: Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 6

1 message

Lorin Fife <lorinfife@gmail.com>
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Ho
<steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen K

Beginning of Installment 6

2019 – Sand continues to migrate across the Central Walk, devouring the greenbelt areas and precluding mobility challenged visitors from navigating the "ADA path."



August 18, 2019 – Sand piles covered by huge weeds in the left foreground were Greenbelt dedicated by the developer of the Colony and the Hotel to the City and zoned City. Picnickers can't really lay out a blanket there anymore, but then they no longer have a view of the coast, either. This should be a terrible source of embarrassment to were apparently cleared the day before based on the relatively minor sand cover, but the loose sand on concrete still presents a slip and fall hazard.



The greenbelt public park area now features “cliffs” that are several feet tall in some locations. You don’t have to be a trial lawyer to recognize that somebody is going to cliffs and the City is going to have a major lawsuit on its hands. Also, note how the Hotel Bobcat has pushed sand from in front of the Hotel onto the sand piles manufactu Hotel’s elevated guest views clear to the shoreline.



November 8, 2019 – Another series of photos. The Central Walk back to its usual state, filled with sand that has tumbled down from the sand piles. The iceplant covers th the palm trees still haven't been skinned. Sand and huge weeds, many of them long dead, cover the "greenbelt" south of the Hotel.







July 19, 2020 – Another series of photos, this taken during the COVID pandemic. The iceplant growing near the myoporum and the parking lot south of the Hotel has co in 4 and 5 foot clumps, while the myoporum is probably more than 30' above grade.







The grass dividing the bike path from the pedestrian walkway, while still green in 2020, had mushroomed above grade, creating hazards for pedestrians, bicyclists and surı
path near Sunset Lane and Mandalay Beach Road.



Long lost greenbelt. Note the difference between the lawn maintained by the Hotel in the background and what used to be an identical lawn in the right foreground planted same developers. But the latter is maintained by the City of Oxnard. And the walkways (the City refers to them as “ADA paths” in the City Proposal) are once again cove to be a grassy public Greenbelt picnic area in the second photo.





End of Installment 6 - Installment 7 will continue on February 2, 2021

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 7

1 message

Lorin Fife <lorinfife@gmail.com>
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Ho
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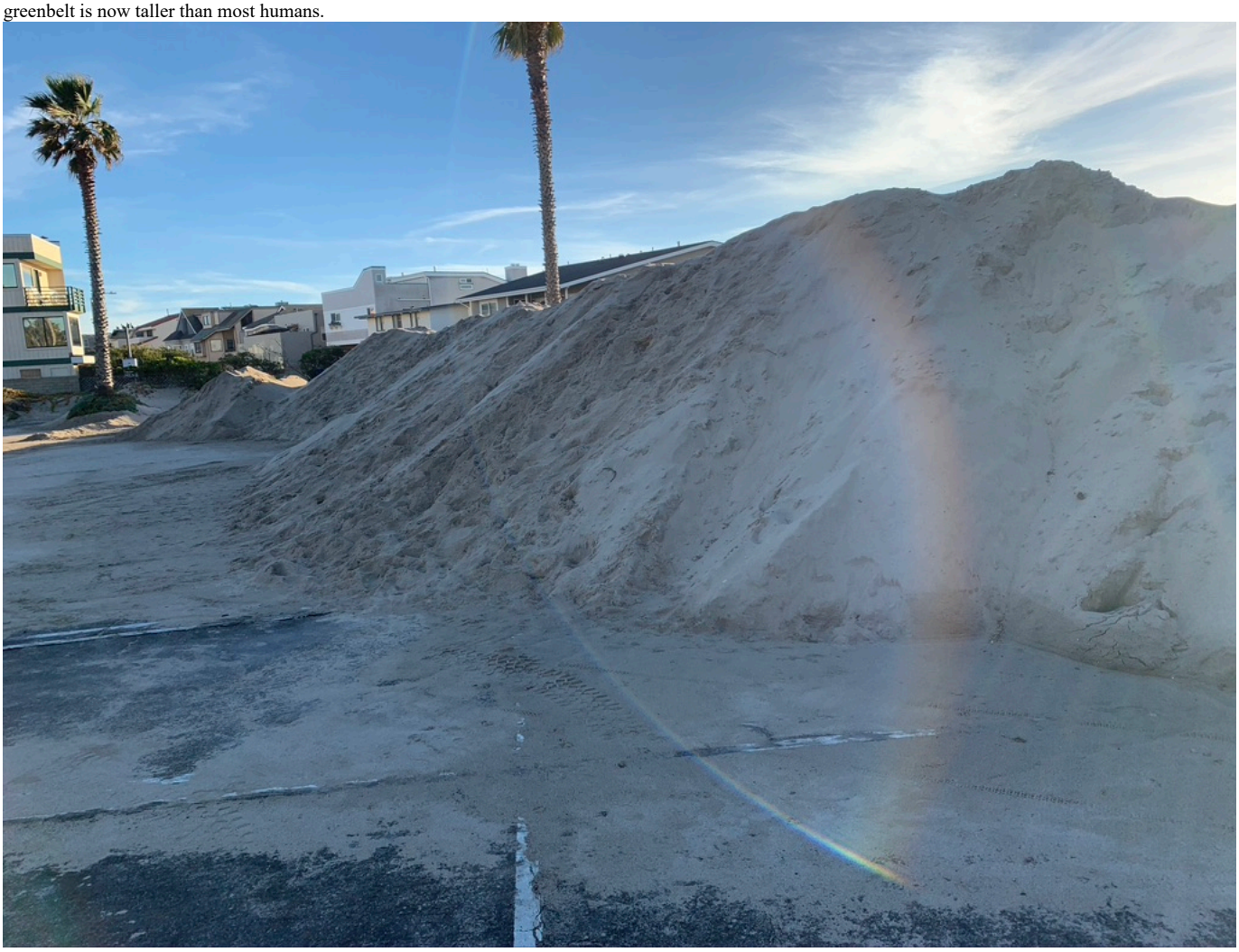
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen K

Beginning of Installment 7:

February 2, 2021 – City collected sand piles, around 10’ tall, covering the parking lot south of the Hotel waiting to be transported away. Meanwhile, the City sand piles c continue to migrate inland covering more and more of the greenbelt public park in the third photo. The Central Walk is buried again in the fourth photo. The sand cliff on greenbelt is now taller than most humans.











March 2021 — Both the parking lot and the “ADA path” to the beach buried in sand.



April 8, 2021 — A city tractor finally clearing the access to the beach at Ed Hunt Rehab Point.



June 25, 2021 – From the parking lot south of the Hotel. The City-manufactured sand piles are beginning to get as tall as the palm trees in the background. And the icepl strangling anything that tries to join it in the neighborhood. Tough to access the beach when this is standing in your way. And the Greenbelt public park…? Not so green can is just about gone.







Let's hope an emergency vehicle racing to a rescue and a bicyclist don't approach in opposite directions. It doesn't take long for these sand piles along the bike path near the bike path and the ADA pedestrian walkway.



A City tractor has clearly been through this “ADA path” recently, but the path is totally covered by loose sand.



End of Installment 7 - Installment 8 will begin on June 6, 2021

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 8

1 message

Lorin Fife <lorinfife@gmail.com> Mon, Nov 4, 2024 at 5:52 PM
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Howlett <steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen Kulik <gkulik@kgswlaw.com>

Beginning of Installment 8:

June 26, 2021 – Another day in the parking lot south of the Hotel, and neighboring Sunset Lane. The sidewalks are buried with sand, forcing pedestrians into the streets. Parkways that were originally beautiful lawns are now mostly barren or choking with weeds or iceplant. The Greenbelt picnic area is almost completely gone.








ARMADA




$19.95



The City tractor operator apparently gave up trying to clear the Central Walk when the operator realized the sand piles in the greenbelt area were getting almost as tall as the sand piles on what used to be a flat beach. Note the rather imposing wall of sand across the Central Walk. Another ADA path, according to the City Proposal.





Behind the partially buried bench, the non-native, invasive myoporum just keeps on growing.





The Central Walk, the bike path and the pedestrian walk, all “ADA paths” according to the City, converge near the Hotel. And they’re all buried in sand.



End of Installment 8 - Installment 9 will continue with more photos from June 26, 2021

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 9

1 message

Lorin Fife <lorinfife@gmail.com>
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Ho
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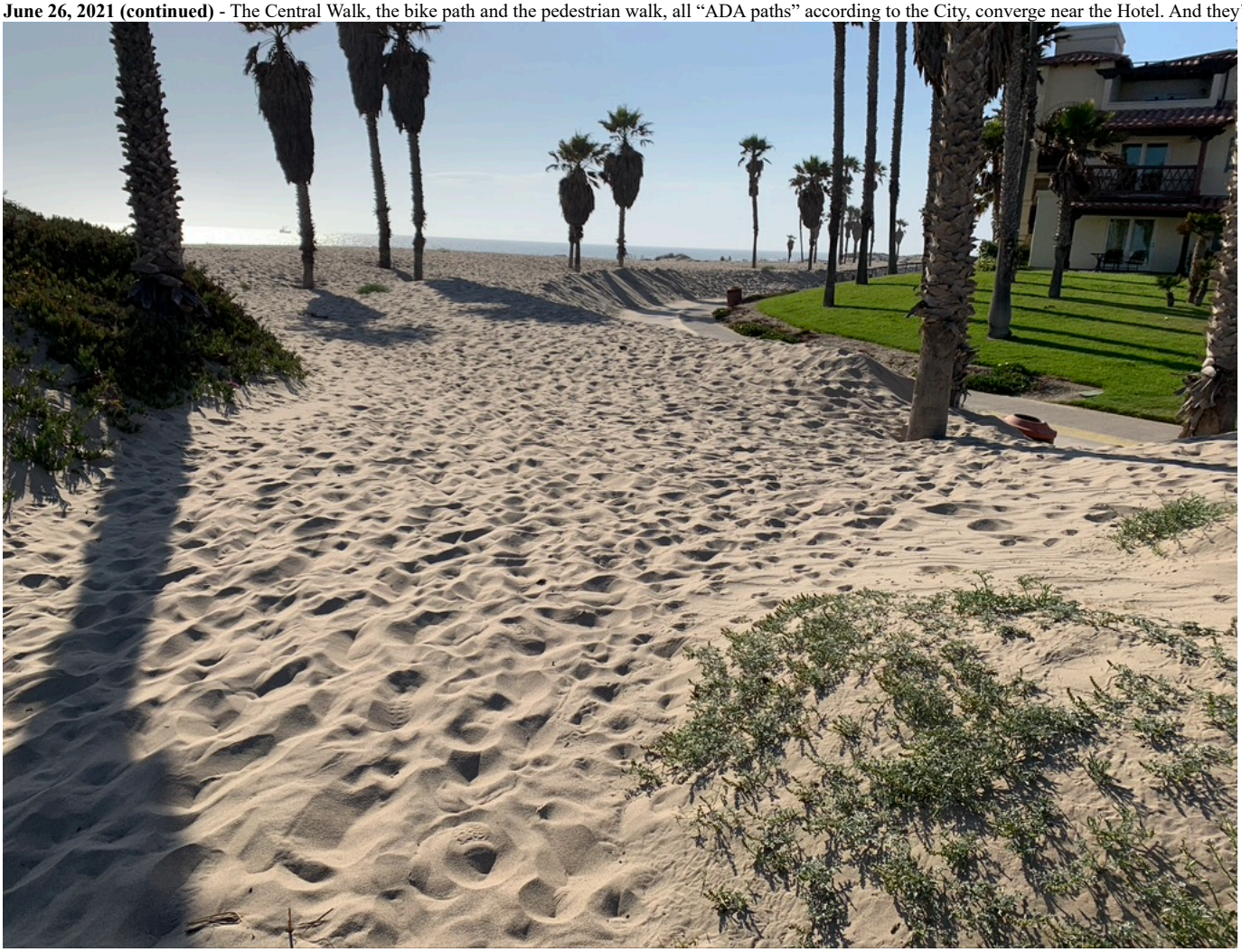
Beginning of Installment 9:

June 26, 2021 (continued) - The Central Walk, the bike path and the pedestrian walk, all “ADA paths” according to the City, converge near the Hotel. And they’re all buri



But it’s always great to see a City contractor out working with exactly the right tools for the job.



December 8, 2021 – Several months later, a City tractor sighting! Let's hope he can get through the sand canyon to clear the walkway.





A tight fit, but he made it. His blade doesn't appear to ever touch the sand, but maybe that wasn't his job.

It can't be very efficient for this City tractor driver to drive a half mile on City streets and the bike path with sand blowing off his front loader to deposit this load of sand



January 2, 2022 – The bike path and pedestrian walkway were designed to drain onto the flat sandy beach after a rain, not into City-manufactured sand piles lining the wa
once again becomes a perfect breeding ground for the virus-carrying Aedes mosquito.



February 22, 2022 – The sand did not stay off the bike path and pedestrian walkway around the hotel for very long after the Hotel was only authorized to clear a very nar concrete, especially since the sand was moved directly back out to a location from which it would blow right back to the areas from which it had been removed.

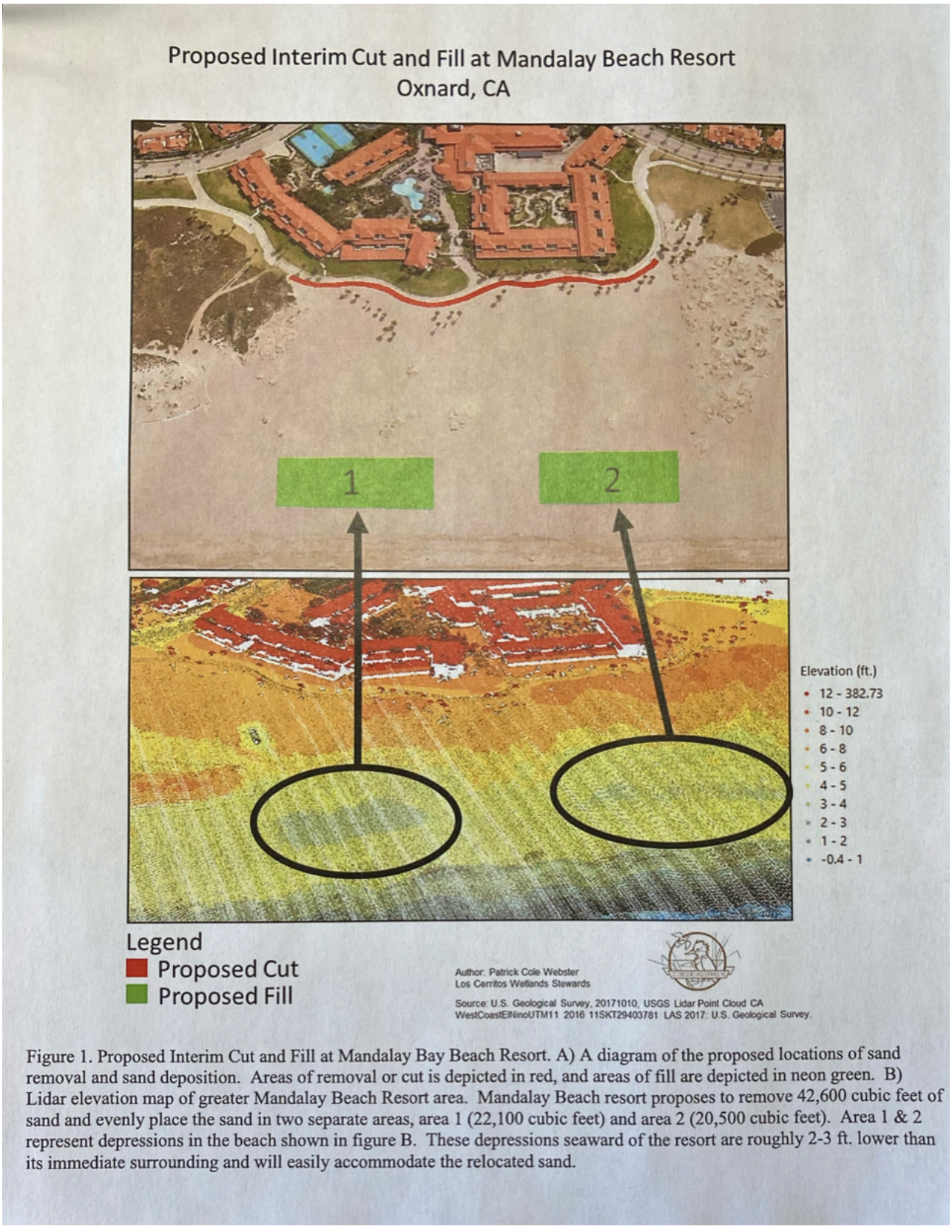


Figure 1. Proposed Interim Cut and Fill at Mandalay Bay Beach Resort. A) A diagram of the proposed locations of sand removal and sand deposition. Areas of removal or cut is depicted in red, and areas of fill are depicted in neon green. B) Lidar elevation map of greater Mandalay Beach Resort area. Mandalay Beach resort proposes to remove 42,600 cubic feet of sand and evenly place the sand in two separate areas, area 1 (22,100 cubic feet) and area 2 (20,500 cubic feet). Area 1 & 2 represent depressions in the beach shown in figure B. These depressions seaward of the resort are roughly 2-3 ft. lower than its immediate surrounding and will easily accommodate the relocated sand.

July 6, 2022 – Another series of photos. In the first, a City tractor clearing the Central Walk south of the hotel. Note the height of the sand piles relative to the tractor and growing in what used to be the greenbelt public park area.



A City maintained parkway in the neighborhood near the entrance to the parking lot south of the Hotel. Note the dead fronds that have hurtled through the air before landi



End of Installment 9 - Installment 10 will continue on July 6, 2022

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 10

1 message

Lorin Fife <lorinfife@gmail.com>
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Ho
<steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen K

Beginning of Installment 10:

July 6, 2022 (continued): Gophers and other rodents have taken over many of the City-maintained parkways, while sand buries everything and City hardware is left to ru
Oxnard that the City wants to project around its most extraordinary natural resource?




GATES
OPEN
AT DAWN
CLOSED/LOCKED
AT DUSK







We seriously assume the City put out the orange cone as an avalanche warning to pedestrians attempting to navigate the Central Walk south of the Hotel. Please compare early 1991 from almost exactly the same location showing a City bulldozer beginning to build the sand piles.



Another “ADA path,” this one on the east side of the Ed Hunt Rehab Point walk.



Giant fields of City-planted iceplant north of the Hotel between the Park and the shoreline.



End of Installment 10 - Installment 11 will continue on July 6, 2022

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 11

1 message

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Beginning of Installment 11

July 6, 2022 (continued) - While we cheer for the City's efforts, from time to time, the City seems to have difficulty taking care of its public parkways like these near the Hotel, giving visitors an impression of the City that the City probably would rather not project.





Sunset Lane approaching Mandalay Beach Road. Parkway and Greenbelt maintained by the City, once again not designed to show off the City in the best light.




STOP




SPEED
LIMIT
25



This used to be a flat parkway dividing the bike path from the pedestrian walkway south of the Hotel. Now it's a trip and fall hazard waiting to happen.



End of Installment 11 - Installment 12 will begin on October 31, 2022

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 12

1 message

Lorin Fife <lorinfife@gmail.com>
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Ho
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Beginning of Installment 12:

October 31, 2022 – Sand in the parking lot again.





October 29, 2024 — An up-to-date photographic survey of the area. Please compare this photo to the photo from 1985 to see how the area has fared over time. Note that their dead fronds removed, but the frond bases have been left to be turned into dangerous, but smaller, missiles when the wind blows. Parkways barren, weeds out of cont sand. "ADA paths" blocked and covered by sand. Greenbelt public park totally gone. Does the City wonder why businesses are reluctant to move to the area?



A view towards the beach from Mandalay Beach Road. As noted in the City's LCP, this view used to extend directly to the shoreline, the Santa Barbara Channel and Char beyond. Now we get a view of a massive network of artificial sand piles and non-native, invasive plant species. The myoporum and iceplant are even more out of control











End of Installment 12 - Installment 13 will continue on October 29, 2024

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 13

1 message

Lorin Fife <lorinfife@gmail.com> Mon, Nov 4, 2024 at 7:37 PM
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Howlett <steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
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Beginning of Installment 13:















One of many “residents” of the City sand piles, with the Hotel to the north in the background.





End of Installment 13 - Installment 14 will continue on October 29, 2024

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 14

1 message

Lorin Fife <lorinfife@gmail.com> Mon, Nov 4, 2024 at 7:50 PM
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Howlett <steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen Kulik <gkulik@kgswlaw.com>

Beginning of Installment 14:

October 29, 2024 (continued) - The Central Walk, blocked again for our mobility challenged neighbors. The sand piles west of the Central Walk are up to 20' above grade here, and the sand piles east of the Central Walk in what used to be the Greenbelt park area are rapidly catching up.



Sitting on a picnic blanket on this spot, on what used to be a beautifully manicured lawn, a family could look to the northwest and see the shoreline extending down the Channel as far as Santa Barbara or even Lompoc, with crystal clear views to the west and southwest of the Channel Islands. Today? You can see the City's sand piles. And picnic on them, as well. Sad.



Another blockage of an “ADA path.” And palms that have not been pruned or skinned in years.



Palm trees desperately in need of pruning and skinning buried half way up their trunks by accumulated sand in front of the Hotel, and the view of the shoreline from the bike path and the pedestrian walkway are long gone. The bike path and emergency vehicle access totally blocked again.





North of the Hotel, non-native, invasive iceplant as far as the eye can see.



End of Installment 14 - Installment 15 continues on October 29, 2024

CITY OF OXNARD CALIFORNIA

Pearson II, Joe <joe.pearson@oxnard.org>

Oxnard Sand Management Plan - Planning and Zoning Permit No. 22-400-06 (Coastal Development Permit) - Installment 15 (FINAL)

1 message

Lorin Fife <lorinfife@gmail.com> Mon, Nov 4, 2024 at 8:07 PM
To: Planning@oxnard.org, john.zaragoza@oxnard.org, bert.perello@oxnard.org, "Nguyen, Alexander" <alexander.nguyen@oxnard.org>, Michael Wolfe <michael.wolfe@oxnard.org>, Steve Howlett <steve.howlett@oxnard.org>, Brian Yanez <brian.yanez@oxnard.org>, Joe Pearson <joe.pearson@oxnard.org>
Cc: Steve Hudson <Steve.hudson@coastal.ca.gov>, Fran Pavley <franpavley@yahoo.com>, Glenda Rivera <glenda.rivera@hilton.com>, Garett Guenot <gguenot@pmpmanage.com>, Glen Kulik <gkulik@kgswlaw.com>

Beginning of final Installment 15:

October 29, 2024 (continued) - The City is still having trouble keeping parkways manicured. Costa de Oro across Mandalay Beach Road from the Zachari Dunes.




This City-maintained median is the first view visitors to Oxnard see driving down Costa de Oro to the Hotel.




APPENDIX 2

THE COLONY'S ADDITIONAL OBJECTIONS BASED ON THE CITY'S OWN LOCAL COASTAL PLAN AND OTHER FACTORS

Relevant History and Background: The City adopted its "Oxnard Coastal Land Use Plan" (as amended, the "LCP") during February 1982, with amendments adopted during October 1986, August 1987, January 1988 and most recently on May 14, 2002. The LCP may be located at: https://www.oxnard.gov/wp-content/uploads/Coastal-Land-Use-Plan.pdf

We have confirmed with City staff that this reflects all amendments to the LCP adopted by the City to date. We hereby object to all of the violations of the City's own LCP and other applicable ordinances, statutes and other laws, as described in the following pages.

The City's Beach Areas Are Scarce, Precious Natural Resources. On page III-46, the LCP provides in pertinent part that, *"Oxnard's beaches constitute a major undeveloped recreational resource of local and State-wide significance…. There are seven beach areas in the Oxnard coastal zone; five in the city and two in the county. Public use of these beaches is limited due to the present lack of access and parking."* The LCP describes several of these beach areas, including: "*Oxnard Shores: 5400 feet beach frontage, 10 acres dry sandy area; Mandalay Beach: 3400 feet beach frontage, 10 acres dry sandy area [see LCP page IV-18, Mandalay Beach is "located northwest of the intersection of Harbor Boulevard and Fifth Street"]; Hollywood Beach (County) 6800 feet beach frontage, 60 acres dry sandy area; Silver Strand (County) 4600 feet beach frontage, 40 acres dry sandy area…."*

Page II-1 of the LCP in 2.2 divides the City's long coastal zone into four areas from north to south: McGrath-Mandalay, Oxnard Shores, Channel Islands Harbor and Ormond Beach. Areas Three and Four are located in Oxnard Shores near its southernmost edge, near where it abuts Hollywood Beach and the Channel Islands Harbor area.

On page III-47, the LCP states that, *"The majority of the oceanfront property in the Oxnard Shores Neighborhood is privately owned [making public beach areas like Areas Three and Four even more precious]…. Portions of the beachfront property are subject to periodic flooding. This flooding primarily occurs in response to major offshore storms, which would limit access at those times."* **Given the scarcity of public beaches, open spaces and ADA-compliant access to those beaches, it is surprising that the City would violate its own LCP in an attempt to create synthetic sand piles the way it has in Area Four, would plant non-native, invasive species of vegetation as it has all over Areas Three and Four, or cause even naturally occurring dunes between the Park and the shoreline to grow well beyond natural sand dune morphology. We strenuously object to these actions taken by the City in violation of the LCP.**

The City's LCP Defines and Identifies All Coastal Resource Protection Zones and Coastal Recreation Zones. City Council Resolution 12,143, which amended the LCP in 2002, among other actions, amended Section 2.3.1 of the LCP to read in pertinent part:

"RP — Coastal Resource Protection Zone: 'The purpose of the RP zone is to protect, preserve, and restore environmentally sensitive habitat areas within the coastal zone of the City….'"

"RC — Coastal Recreation Zone: 'The purpose of the RC zone is to provide open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential. Such uses should offer recreational activities which complement and are appropriate to the area because of their natural resources and beauty. This zone is designed to implement the recreational policies of the Oxnard Coastal Land Use Plan, as outlined in Chapter 3.7.1…. Nothing in this section shall restrict public or private access to recreational opportunities provided within the coastal zone of the City…."

The City Does Not Have Authority to Manufacture Environmentally Sensitive Habitat Areas. Critical to any analysis of the City's powers and limitations under the LCP, the City is given the power in the LCP in Coastal Resource Protection Zones *"to protect, preserve, and restore environmentally sensitive habitat areas within the coastal zone of the City."* [Emphasis added.] **Nowhere in the LCP is the City given the mission of inventing or creating environmentally sensitive habitat areas (collectively, "ESHAs" and each individually an "ESHA") in areas in which ESHAs did not previously exist. This issue is further emphasized on page I-2 of the LCP, which provides in pertinent part:** *"Preservation of sensitive habitat*

areas and coastal resources and the provision of coastal access are the highest priority. In areas that are determined to be neither sensitive areas nor suitable for agriculture, coastal-dependent uses, including public recreational uses… receive the highest priority…." **At no time in the history of the City has the City declared any part of Areas Three or Four to be a Coastal Resource Protection Zone or an ESHA. By recklessly manufacturing artificial sand piles in Area Four and consistently distorting the natural dune morphology of sand dunes in Area Three, neither of which is in a Coastal Resource Protection Zone, the City violated this provision of the LCP. The City cannot now come in and pretend that these artificial and dangerous sand structures in Area Four, that have never hosted any endangered plant or animal species, as documented in the City's own surveys, are suddenly worthy of the designation of an Environmentally Sensitive Habitat Area.**

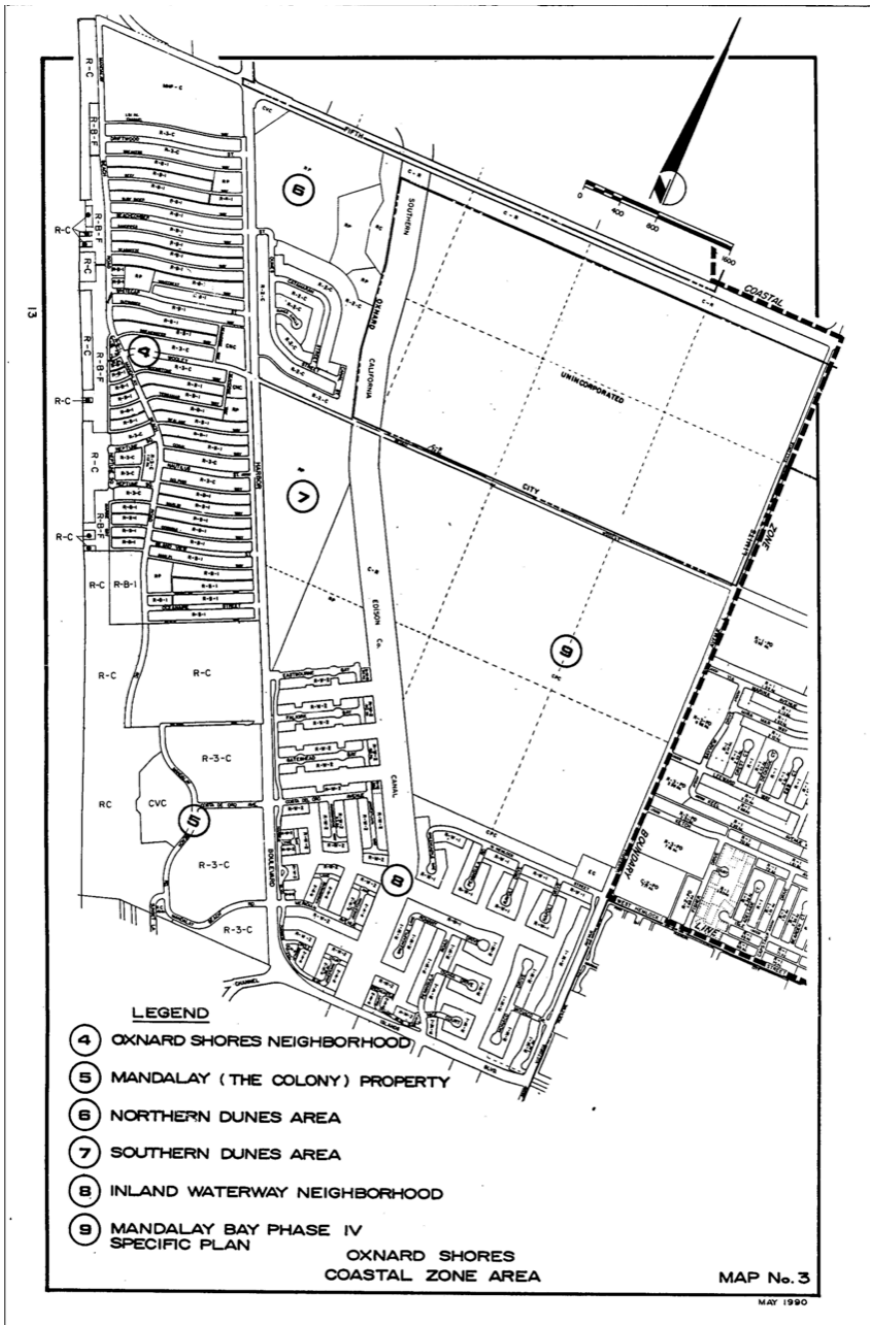
The LCP Contains Extensive, Detailed Provisions Concerning the Colony Development, But Contains No Identification of Any ESHAs in the Colony Development Area. Page II-3 of the LCP contemplates the development of the Colony, the Hotel and the Park, as well as the areas including the bike path, the greenbelt public park areas, the pedestrian ADA-compliant walkways and parking lots and the adjacent beaches (along with other recreational aspects of the Colony Development, the "Park Amenities"). The project to develop the area including the Colony, the Hotel, the Park and the Park Amenities is collectively referred to herein as the "Colony Development." The Colony Development is bounded on the west by the shoreline, on the east by Harbor Boulevard, on the north by the northern boundary of the Park, and on the south by the City boundary with Hollywood Beach and the Park Amenities that extend inland to the intersection of Harbor Boulevard and Channel Islands Boulevard (the "Colony Development Area").

The LCP gives extensive attention to the Colony and the planning and requirements that went into the approval of the Colony Development. Beginning at page III-34, the LCP details that, *"The Colony [Development Area], a 115-acre planned development site located between Harbor Boulevard and the Pacific Ocean, north of Channel Islands Boulevard and south of Falkirk Avenue [sic – the Colony Development is actually bounded on the north by Beach Way], is a recognizable residential and resort facility. Public access to the beach is provided by means of a promenade and bike path which extends [sic] along the entire length of the overall development. The site consists of residential areas, hotel and public beach with public parking facilities provided. The site consists of residential areas, hotel and public beach with parking facilities provided. [The Colony Development will:] a. Retain a public beach of 36 acres along the westerly ocean frontage. b. Maintain the 45 acres of residential uses within the site having a net density of 9.5 to 11.1 dwelling units per acre. c. Retain the public linear pedestrian and bike path as located along the south property line for the length of the site at a width no less than 30 feet to provide public access and view to the ocean. d. Adequate public parking facilities have been provided and are to be maintained as such. Development shall not interfere with the public's right of access to these parking facilities. e. The Visitor-serving Commercial hotel facilities shall be maintained as a hotel facility and is [sic] not to be converted to permanent residential uses. f. The development is to remain consistent with the specific plan and coastal development permit as adopted."* **There is no reference in the LCP or elsewhere to endangered species or environmentally sensitive habitat areas that exist or existed anywhere in the Colony Development Area. There are requirements to retain the pedestrian and bike paths for the length of the site at a width of no less than 30 feet and to protect the views to the ocean from those pedestrian and bike paths. The City's development of massive sand piles in violation of its own LCP routinely causes all pedestrian and bike paths in the area, including those required for mobility-challenged individuals (including residents of the Colony) and emergency vehicle access to the beach, to be totally or partially blocked and dangerous. The artificial sand piles manufactured by the City also totally block the public views that the City mandated in its own LCP. The LCP also requires the Colony Development to be maintained consistent with the LCP. The City has undermined this requirement through its development activities manufacturing the Area Four sand piles.**

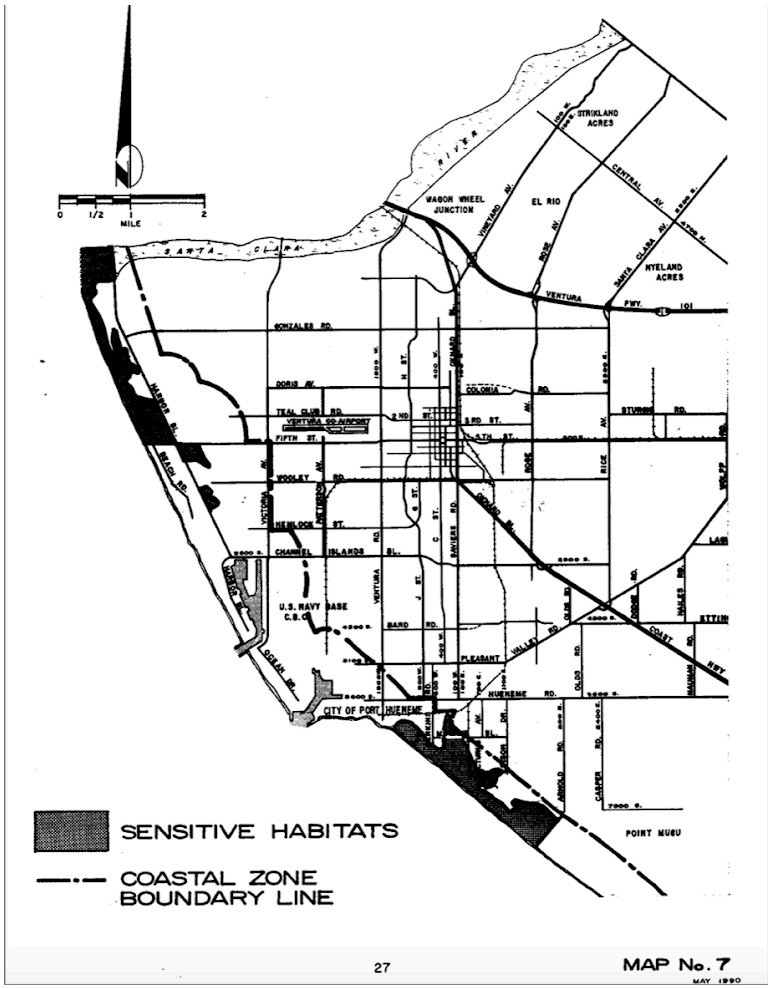
Page III-48 of the LCP similarly provides that, *"The Mandalay Beach Associates property, known as 'The Colony,' [i.e., the Colony Development] a 115-acre planned development site located between Harbor Boulevard and the Pacific Ocean, north of Channel Islands Boulevard, and south of Falkirk Avenue [sic – see above], is a recognizable residential and resort facility. Public access to the 36-acre public beach is provided by means of a promenade and bike path which extends along the entire length of the overall development…. Parking is a constraint to visitor beach access in the Oxnard Shores Neighborhood…. The development proposal for the 115-acre parcel south of the Oxnard Shores Neighborhood [the Colony Development] includes plans for 300 public parking spaces to help alleviate this problem…. The… Park at Oxnard Shores was approved in 1986 and will accommodate approximately 563 public parking spaces which will further help improve parking conditions for visitor beach access."* **It is clear from the LCP that the entire Colony Development was meticulously reviewed and negotiated by the City with the developers prior to its development. The conditions agreed upon by the developers of the Colony and the City during the development process as detailed in the LCP were critical consideration for the developers, as predecessors in interest to the residents of the Colony and the owners of the Hotel, to develop all aspects of the Colony Development — not only the Colony and the Hotel, but even more so the dedicated public spaces, the Park and the Park Amenities. The City cannot unilaterally change the nature of the covenants it entered into with the developers of the Colony Development or the consideration to which the parties agreed.**

Page II-3 of the LCP provides that, *"The remainder of the [Colony Development] property [i.e., the Park and Park Amenities] has been designated for recreational use…."* In connection with these provisions, the LCP includes Map No. 3 (included below), which clearly identifies the Colony Development as zoning areas R-C and RC (Coastal Recreational Zone areas) for the Park and Park Amenities, CVC (visitor serving commercial) zoning for the Hotel, and R-3-C (residential) zoning for the Colony.

Map No. 3 also identifies two areas of sand dunes, the "Northern Dunes" in area 6 south of Fifth Street and east of Harbor Boulevard, and the "Southern Dunes" in area 7 east of Harbor Boulevard, south of Wooley Road and north of Eastbourne Bay. **The LCP, however, identifies no ESHAs and no dunes of any kind, environmentally sensitive or not, in the Colony Development Area with the sole exception of the sand dunes located between the Park and the shoreline. There are no sand dunes identified anywhere south of the Hotel in the LCP.**



The LCP Establishes the Standards for Projects in the City's Coastal Zone and Identifies Environmentally Sensitive Habitat Areas. Page III-1 of the LCP provides that, *"The policies established in this chapter… will become the standards by which future projects in the [City's] coastal zone are evaluated…."* **Those policies clearly govern any development work by the City within its coastal zone, including Area Four. They do not authorize the City's reckless efforts to build enormous sand piles on a flat sandy beach in Area Four with no existing sand dune morphology, nor do they sanction the City's planting or nurturing of non-native, invasive species of vegetation in the coastal zone (e.g., myoporum and iceplant), which now have had decades to choke out all native plant species.**



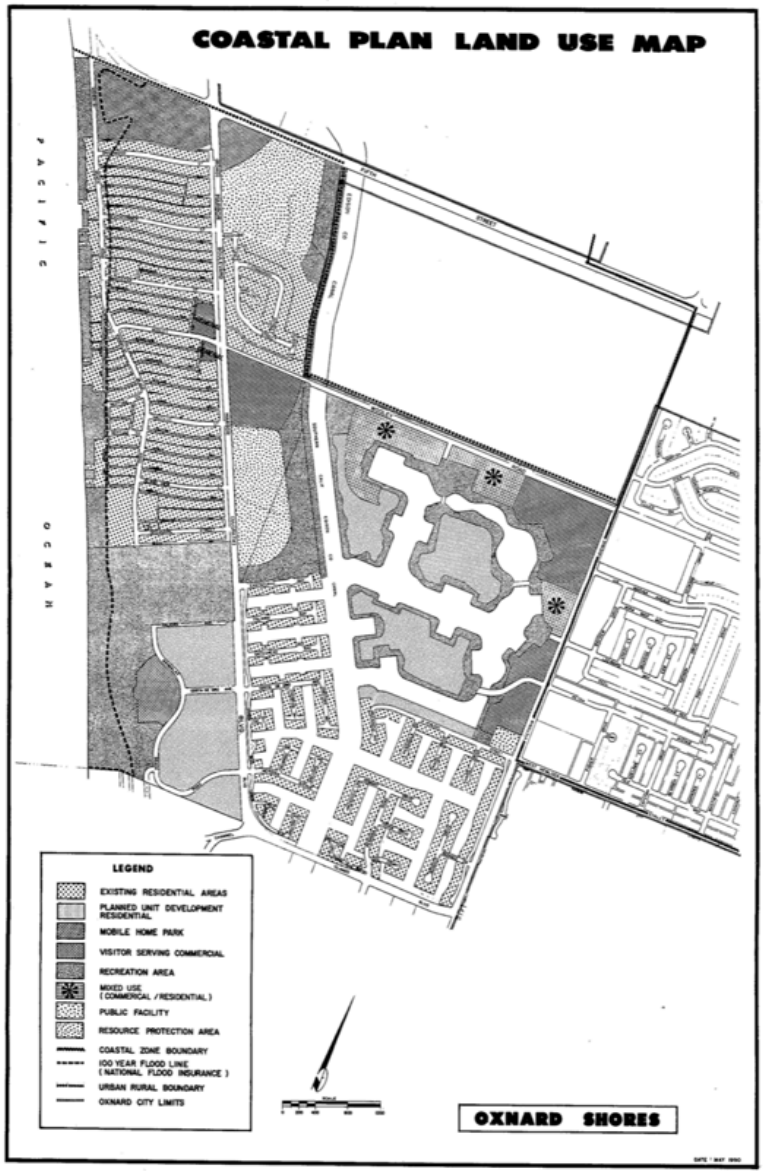
Page III-7 of the LCP adopts the State of California's Public Resources Code (the "Code") standards for ESHAs, protecting *"against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas…. Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas."* The LCP also provides that, *"The City of Oxnard's coastal zone contains four examples of sensitive habitats and four endangered species. Map 7 [included above] illustrates the extend [sic] of the City's wetlands, sand dunes, riparian areas and McGrath Lake."* **Map No. 7 is quite clear and specific. It identifies no sensitive habitats in Areas Three or Four. There are clearly and expressly no ESHAs identified in the Colony Development Area.**

If there had been ESHAs of any kind in or near the Colony Development, the City would have been obligated, in accordance with provisions of Code Section 30240, which is expressly incorporated into the LCP, to protect those areas against *"any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas…. Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas."* **Since there are no ESHAs in the Colony Development Area, and never have been, none of these measures were required of or taken by the City in Areas Three or Four.**

The LCP is Also Quite Specific about the Location of Sand Dunes and Resource Protection Areas in the City's Coastal Zone, None of Them Located in Area Four. Page III-8 provides that, *"Sand dunes are found in five areas of the [City's] coastal zone. A 26-acre area of dunes at the intersection of Fifth Street and Harbor Boulevard is an excellent example of this increasingly rare habitat…. A third area of sand dunes is located at the northerly end of 'The Colony' property adjacent to the [Park] site. Low, previously disturbed*

dunes have re-formed in this area." These sand dunes lay well north of the Hotel between the Park and the shoreline. The LCP continues, *"A chain of dunes parallel the beach from the Santa Clara River mouth south to Fifth Street…. The endangered least tern has used the dunes near the river mouth for nesting sites…. The last chain of dunes is located at Ormond Beach. Paralleling the beach beyond tidal action, the low dunes provide nesting sites for a number of species, including the least tern."* Page IV-19 of the LCP provides additional detail regarding the Northern Dunes and the Southern Dunes, giving them the Resource Protection designation and limiting access to them. **Neither the sand dunes in Area Three nor the artificially manufactured sand piles in Area Four are accorded the Resource Protection designation nor has access ever been limited to any portion of Area Three or Area Four.**

See also Map No. 18 following page IV-34 of the LCP, the City's "Coastal Plan Land Use Map," which is also quite detailed (included below). **Note that the future Park area and the area between the future Colony and Hotel and the shoreline are identified as Recreation Areas, not as Resource Protection Areas. Resource Protection Areas are clearly identified on the map only in the areas of the Northern and Southern Dunes. No sand dunes are identified anywhere south of the northern boundary of the Colony. In particular, there are no sand dunes located in Area Four. Even the City in its own LCP does not accord the artificially manufactured and environmentally disastrous sand piles in Area Four the dignity of this categorization.**



The LCP Also Identifies All Endangered Species Habitats and Environmentally Sensitive Habitat Areas in the City's Coastal Zone, None of Them Near the Colony Development. Page III-10 of the LCP details endangered species habitats. **The LCP identifies no endangered species in the Oxnard Shores area. There are no endangered species or endangered species habitat areas that any survey has ever identified in Area Three or Area Four.** Note that in the Wetlands discussion on page III-7, the LCP notes that the Ormond Beach wetlands and wetlands at the mouth of the Santa Clara River *"provide nesting and feeding areas for a variety of birds and mammals, including the endangered Belding's Savannah sparrow…. The drainage ditch at Ormond Beach provides a habitat for [the unarmored three-spined stickleback, a rare fish]."* These areas are miles away from Areas Three and Four. **No endangered plant or animal species habitat currently exists or has ever existed in Area Three or Area Four, as confirmed by the City's own survey of the areas.**

Providing more detail regarding the history of the Colony Development, the LCP, starting on page IV-18, specifically notes that, *"Approval of residential and visitor-serving development on [the Colony Development] affords significantly improved lateral and vertical access in the area south of the existing Oxnard Shores Neighborhood. Development of a 40-acre City park between Oxnard Shores and The Colony project provides a large area of vertical access as well as improved parking areas group facilities [sic], a day-use beach, and interpretive areas."* **Once again, there is no discussion in the LCP, the City's own definitive set of findings, regarding ESHAs anywhere near the Colony Development.**

The LCP and the City's General Plan 2030 Prioritize Public Visual Resources and Demand Minimization of Alterations to Natural Land Forms that Interfere with Such Resources. With respect to the important environmental priority of preserving visual resources, the City's LCP incorporates Code Section 30251, which provides that, ***"The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms,*** *to be visually compatible with the character of surrounding areas and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas, such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government, shall be subordinate to the character of its setting…. Scenic ocean views can be found along the Oxnard coast.* ***Mandalay Beach Road parallels the beach giving vistas of the ocean and on clear days the Channel Islands****."* [Emphasis added.]

Among the "Aesthetic Resources" identified by the City in its "General Plan 2030" (the "General Plan") on page 1-22, the General Plan notes that *"Oxnard is defined by open spaces, beaches and coastline…,"* and discusses *"key view corridors."* It goes on to state on page 1-23 that *"Oxnard's beaches and coastline are recognized as the City's primary natural scenic resource."* It notes that, *"City, County, and State beaches provide views of the Pacific Ocean and the offshore Channel Islands on clear days. Other resources in the coastal zone include tall sand dunes near Mandalay Beach and the wetlands in the Ormond Beach area."* These dune and wetland areas are each located more than a mile from the Colony Development.

When the CCC and the City required dedication of the Park Amenities and the Park as conditions for the approval of the Colony Development, the public views from the Park and the Park Amenities, in particular from Mandalay Beach Road and the greenbelt park areas, the bike path, and the pedestrian walkways west of Mandalay Beach Road all had magnificent public views of the shoreline and the Channel Islands. Those public views were still available at the time the developers completed the Colony Development. **However, those public views are now all completely blocked by the City-manufactured sand piles, which intentionally altered the natural land forms of Area Four in violation of the City's own LCP.**

The City-Manufactured Sand Piles Will Not Provide Any Protection Against Hazards. Representatives of the City may argue that the City-manufactured sand piles might have some value to protect the Colony

from hazards such as sea level rise, storm wave run-up or tsunami. Such an argument would be patently absurd. As noted on page III-24 of the LCP, *"The coastal zone is also within the tsunami hazard area. The flat Oxnard Plain creates no obstacles to tsunami wave run-up…. Beach erosion[,] storm wave run-up and flooding area problems [exist] within much of the City's coastal zone [sic]. Erosion and storm wave run-up threaten the 27 homes located west of Mandalay Beach Road in Oxnard Shores."* The City's artificial sand piles are located in an area that would be inundated from all sides in the event any of these hazards actually materialized. The City's artificial, manufactured sand piles would provide no protection. Any such argument would also fail to take into account the effects of the flat sandy beaches between the shoreline and hundreds of homes in adjacent Hollywood Beach, outside the City limits, as well as the northern portions of Oxnard Shores, and the consequences of such hazards in Channel Islands Harbor, all of which effectively end run any potential barrier the artificial sand piles might create. Furthermore, the LCP goes on to say on page III-24 that, *"All applications for grading and building permits and subdivisions shall be reviewed for threats from hazards such as seismic activity, liquefaction, tsunami run-up, seiche, beach erosion, flood, storm wave runup [sic], and expansive soils."* The City's LCP addresses the Colony and the Colony Development in far more detail than any other development in the City's coastal zone. Under it own LCP, the City was required to take all such hazards into account during its approval of the Colony Development, long before the City began to manufacture artificial sand piles in Area Four. This makes any such argument specious.

By Artificially Manufacturing the Sand Piles in Area Four and Introducing Non-Native, Invasive Plant Species to the Coastal Zone, the City Has Confiscated Scarce Public Open Spaces and Engaged in Development in Violation of Its Own LCP. Page III-32 of the LCP provides that, *"Public open space shall include, but is not limited to, public parks other than identified neighborhood and community parks, beaches, parking lots for public use and access corridors, including pedestrian paths and bikeways."* **What is clear is that the City has confiscated public open space — a flat sandy beach — in violation of its own LCP and transformed it with bulldozed sand, non-native, invasive plants, irrigation systems, sandbags and hay bales into a virtually impassable array of sand piles that block public access to the beach, turn ADA paths and bike paths into hazardous, sand covered obstacle courses in violation of the American with Disabilities Act, and block emergency vehicle access to the beach. They also facilitate illegal activities by individuals hiding or camping among the sand piles. The City-manufactured sand piles and the non-native, invasive species of vegetation the City planted to anchor its artificial sand piles have also migrated beyond the ADA paths to destroy huge swaths of public greenbelt park areas, making them unusable for the general public, and have totally blocked precious public views from those greenbelt public park areas, the City's bike paths, ADA paths, and Mandalay Beach Road in violation of multiple provisions of the City's own LCP.**

Page III-43 of the LCP defines "development," in accordance with Code Section 30106 as *"on land, … the placement or erection of any solid material or… grading… of any materials; [or any] change in the density or intensity of use of land…."* This definition of development *"shall be used to determine what operations will require a coastal development permit."* The City's development activities grading and building the artificial sand piles in Area Four clearly required a coastal development permit and, without one, violate Code Section 30211, which provides that, *"Development shall not interfere with the public's right of access to the sea…."* Such development without a coastal development permit would also violate Code Section 30221, which provides, *"Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area."* Those Code sections are also incorporated into the City's own LCP. Therefore, these violations not only violate the State of California's Public Resources Code, but also the City's own LCP. **We have asked the City at multiple junctures to produce any such coastal development permit for its manufacturing of the artificial sand piles in Area Four, but have received no evidence that any such coastal development permit was ever issued to the City for such purpose.**

The Public Park Greenbelt Areas Destroyed and the Bicycle and Pedestrian Paths Blocked by Sand Migrating from the City's Artificial Sand Piles are Scarce Public Resources That Must Be Restored. Page III-52 of the LCP discusses the City's scarce park areas. *"The Oxnard Coastal Zone had a January 1978 population of 6,784, including the unincorporated area of Hollywood by the Sea and Silver Strand. The population for this same area is estimated to be 12,500 in 1990. Standards set in the City's 1990 General Plan provide for four acres of neighborhood and community park per 1000 population. Based on this factor, the Coastal Zone should presently have 27 acres of park, and 50 acres in 1990…. The total combined acreage of City-owned land for neighborhood or community park use is approximately 10.5 acres, including 4.5 acres in the Channel Islands Harbor and six unimproved acres in the Dunes area [i.e., the Northern Dunes and Southern Dunes east of Harbor Boulevard and well north of the Colony], well below the General Plan's recommendation of 27 acres. Development of the 40-acre… Park… would meet the needs of coastal zone residents and provide coastal parks for the residents in the rest of the City."* **Unfortunately, the City's development of the artificial sand piles has commandeered several acres of public beach. Sand migration from these artificial sand piles has also resulted in the virtual destruction of many acres of public park greenbelt areas that were required by the City to be dedicated to the City by the developers of the Colony Development, predecessors in interest to the owners of the Hotel and the Colony. In addition, it is important to note that the Park and Park Amenities are not only available to residents of the City's coastal zone. The general public still flocks to Oxnard State Beach and the loss of precious public open recreation spaces and picnic areas caused by the City-manufactured sand piles have just as much of a detrimental impact on the general public as on residents of the City's coastal zone. Therefore, the LCP probably underestimates the value of these scarce public resources.**

Page III-53 of the LCP provides that, *"Bicycle routes shall be required in new developments wherever appropriate."* **One of the conditions for the City's approval of the Colony Development included creation by the developer of a continuous bike path from one end of the Colony Development to the other and bike racks. Sadly, sand migration from the City's artificially manufactured sand piles in Area Four routinely blocks this bike path, and bicycle storage racks installed by the developers in fulfillment of their obligations during the construction of the Colony Development have disappeared under the City-manufactured sand piles.**

By Manufacturing Artificial Sand Piles That Block the Designed Drainage From the Park Amenities, the City Has Facilitated the Creation of Pools of Standing Water That Can Last For Weeks and Serve As Potential Breeding Grounds For Dangerous, Invasive, Virus-Carrying Aedes Mosquitoes, a Potential Public Health Hazard.



There have now been multiple reports of Aedes mosquitoes in Oxnard, which breed in standing water like the pool above created following a rain storm with water trapped between City-manufactured sand piles and the Hotel. These mosquitoes are known to carry West Nile virus, as well as other viruses like dengue and zika. There have now also been cases of West Nile virus reported in Oxnard. See, e.g., https://www.vcstar.com/story/news/local/2024/08/21/aedes-aegypti-mosquito-reports-ventura-county-california/74866450007/,
and https://www.usatoday.com/story/news/nation/2023/09/24/mosquitoes-west-nile-virus-california-populations/70956111007/
The Aedes mosquitoes breed in as little as a quarter inch of standing water. Rain water trapped following a storm as in the photo above can serve as a perfect breeding ground for these dangerous invaders. The pedestrian ADA-protected walkways and bike paths in the Colony Development Area were designed to be adjacent to flat beaches into which rain water could drain. Because the City-manufactured sand piles do not allow rain water to drain properly from the public pedestrian and bicycle paths throughout the Colony Development Area, not only do the resultant puddles make these paths impassable for emergency vehicles and mobility challenged individuals in violation of the Americans with Disabilities Act, the puddles also become ideal breeding grounds for dangerous mosquitoes, which only require a few days to go from larvae to adults. **Therefore, the City-manufactured artificial sand piles have increased the potential for an Aedes mosquito-related public health hazard**.