

4.0 REVISIONS TO THE DRAFT EIR

In accordance with State CEQA Guidelines Section 15132, this section presents the changes that were made to the Draft EIR to clarify or amplify the text in response to comments. Such changes are insignificant as the term is used in State CEQA Guidelines Section 15088.5(b).

Changes to the Draft EIR use ~~strike-out~~ for text that is removed from the Draft EIR and double underline for text that is added to the Draft EIR. Each change is preceded by a brief explanation of the reason for the change.

Section ES, Executive Summary

Page

Revision:

ES-1

Project Location

The 53.81-acre Project Site is ~~area~~ near the western boundary of the City of Santa Paula and currently lies within the unincorporated County of Ventura. The Project Site is bound to the north by Telegraph Road; to the south by SR 126; to the east by existing industrial and commercial development in the current City limits; and to the west by the Adams Barranca and agricultural operations. The Project Site is bisected by the Ventura County Transportation Commission (VCTC) railroad right-of-way. Local access is provided by Telegraph Road, Beckwith Road, Clow Road, and Todd Lane.

ES-6-7 Table ES-2, Summary of Project Impacts, Aesthetics

<p>Construction activities within the Project Site and off-site improvements, such as along Beckwith Road and Faulkner Road, could potentially be visible from SR 126 and Telegraph Road and other vantage points that currently have views of these areas. Additionally, <u>initial land development including, site clearing, grading, roadway construction, and improvements of the Project Site are anticipated to occur over approximately a 4-month period starting in sometime in 2019. For purposes of the analysis within this EIR, construction of individual buildings is assumed to occur over approximately 10 years in response to market conditions</u> the construction timeframe would occur over approximately 10 years and would alter the existing open space character of the Project Site from immediate surroundings.</p>	<p>Potentially Significant</p>	<p>The impact is on a temporary basis and there are no mitigation measures.</p>	<p>Potentially Significant and Unavoidable (on a temporary basis)</p>
<p>The Project would provide for the development of commercial and light industrial uses, along with roadways and open space across the 53.81-acre Project Site. Building heights would be consistent with the 1- to 2-story buildings having similar uses to the east of the Project Site, with a maximum building height of 35 feet and 45 feet for commercial/light industrial and industrial uses, respectively. Views of the agricultural fields from the SR 126 would be replaced with views of commercial and industrial uses related to the Project. Scenic aspects of the Project Site of the Project Site also include the agricultural lands and Adams Barranca west of the Site. While implementation of the Project</p>	<p>Less than Significant</p>	<p>No mitigation measures required.</p>	<p>Less than Significant</p>

<p>would result in the loss of views of the existing agricultural lands in the immediate foreground with the addition of structures, circulation system, and supporting infrastructure, the urbanized appearance is similar to the adjacent uses, and in More distant scenic vistas views of the Santa Clara River Valley would not be significantly altered upon the development of structures on the Project Site. Therefore, the Project would result in less than significant adverse impacts to scenic vistas.</p>			
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ES-7 Table ES-2, Summary of Project Impacts, Aesthetics

<p>The Project would incorporate various open space/passive uses into the Project design to preserve the visual quality of Adams Barranca, would not remove visually important trees or geologic features, and since the segment of SR 126 that is adjacent to the Project Site is not eligible for designation <u>as a scenic highway</u>, implementation of the Project would not damage scenic resources within a designated state scenic highway.</p>	<p>Less than Significant</p>	<p>No mitigation measures required.</p>	<p>Less than Significant</p>
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ES-8 Table ES-2, Summary of Project Impacts, Aesthetics

<p>The existing visual character and quality of the Project Site is predominantly agricultural in nature, with ancillary agricultural facilities, row crops, and orchards. Due to the Project Site's relatively low and flat elevations, many off-site vantage points of the Project Site are obstructed by existing structures and buildings. However, development within the</p>	<p>Potentially Significant</p>	<p>No mitigation measures.</p>	<p>Significant and Unavoidable</p>
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<p>Project Site can be seen from vantage points that are located immediately adjacent to the Project Site, such as those along SR 126, Telegraph Road, Beckwith Road, Todd Lane, and Faulkner Road. Furthermore, while elevations of the Project Site would remain relatively flat and at low elevations, and although the Specific Plan development standards will be required to ensure a consistent and compatible aesthetic character with the developments to the east, the existing open space and agricultural character of the Project Site would substantially change. The altered views from the public viewpoints that immediately surround the Project Site are considered significant and unavoidable.</p>			
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ES-8 Table ES-2, Summary of Project Impacts, Aesthetics

<p><u>The Project’s development standards establish the types of materials that can be used for various types of structures on the Project Site; reflective, glare-producing materials are prohibited. Daytime sources of glare would include the sun reflecting off glass windows of structures and vehicles. Glare produced from these sources would be brief and intermittent. Therefore, impacts related to glare would be less than significant.</u></p> <p><u>The Project’s nighttime sources of light would include outdoor lights, such as mounted lights and lighted signs on the buildings, parking lot lighting, interior building lights, and headlights of vehicles.</u></p>	<p>Potentially Significant</p>	<p>AES-1: Before the City issues grading permits, the applicant must prepare and submit a Lighting Plan to the City of Santa Paula Planning Director for approval that identifies the types of shielding that will be used for outside lighting <u>and must comply with all applicable dark sky ordinances/regulations.</u></p> <p>All exterior night lighting installed on the Project Site shall be of low-intensity, low-glare design, and hooded to direct light directly downward onto the area being lighted to prevent spillover onto adjacent parcels. Shielding must be included to eliminate uplighting. Exterior lighting fixtures must be kept to the minimum number and intensity needed to ensure public safety. These lights shall be dimmed after 10:00 PM to the maximum extent practical without compromising safety. Upward directed exterior lighting is prohibited.</p>	<p>Less than Significant</p>
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<p><u>Given that minimal outdoor lighting is currently emitted from the Project Site, these impacts related to the additional nighttime light and glare from the Project are considered to be potentially significant.</u></p> <p>The Project would result in a potential for increases glare from within the Project Site during the day from reflective surfaces, and an increase in artificial light during the night. Given that minimal outdoor lighting is currently emitted from the Project Site, these impacts related to the additional nighttime light and glare from the Project are considered to be potentially significant.</p>			
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ES-9-10 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Aesthetics

<p><u>In combination with the Project, all of the proposed expansion areas would change the visual character of the area over time from a more rural setting to one with more urbanized development, especially along the main travel corridors, such as SR 126. The cumulative development would transform the visual character of the City by reducing the amount of open space within the City limits and expanding the urban visual character. However, implementation of the Project and related projects would be consistent with the City's General Plan. While the Santa Paula West Business Park Specific Plan would include various open space and would not affect the Adams Barranca, the development would contribute (albeit to a lesser degree) to the cumulative changes in visual character of the City in combination</u></p>	<p><u>Potentially Significant</u></p>	<p><u>No mitigation measures.</u></p>	<p><u>Significant and Unavoidable</u></p>
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<p><u>with the other relatively large scale related projects. Therefore, as with the Project, impacts related to the views and visual character of the City as a result of the Specific Plan amendment, are considered cumulatively considerable, and significant and unavoidable.</u></p>			
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ES-10-11 Table ES-2, Summary of Project Impacts, Agricultural Resources

<p>According to the FMMP Important Farmland Map for Ventura County, there are approximately 44.220 acres of prime farmland and 4.88 acres of farmland of statewide importance on the site (total of 49.081 acres). Implementation of the Specific Plan would result in the conversion of the 49.081 acres of both prime farmland and important farmland to urbanized uses. <u>Per Government Code Section 56064, the same amount of approximately 49.1 acres of Prime Agricultural Land would be developed.</u></p>	<p>Potentially Significant</p>	<p>AG-1: <u>To reduce or minimize impacts to Prime Farmland, and Important Farmland, and to Prime Farmland as defined in Section 56064 of the Government Code, the Applicant shall provide mitigation through one, or some combination of, the following mitigation measures, prior to the issuance of a grading permit by the City:</u></p> <ol style="list-style-type: none"> 1. <u>The Applicant shall secure a conservation easement in perpetuity, on land officially designated by the State of California as Prime Farmland and Important Farmland. The mitigation ratio shall be 1:1 for each class of designated farmland, resulting in a conservation easement being placed on a total of 44.20 acres of Prime Farmland and 4.88 acres of Important Farmland within the State of California. The applicant may satisfy the Important Farmland mitigation requirement by conserving Prime Farmland; or</u> 2. <u>The Applicant shall make payments to a local, regional, or statewide organization whose purpose is to acquire agricultural conservation easements for Prime Farmland and Important Farmland, and has demonstrated a successful track record in doing so, over at least 5 years. If the applicant elects to pursue this option alone, or in combination with option 1, the Applicant shall demonstrate to the City Planning Director that it has paid funds sufficient to</u> 	<p>Significant and Unavoidable</p>
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		<p><u>allow the state, regional, or local conservation organization to acquire conservation easements in perpetuity over Prime Farmland and important Farmland resulting in a mitigation conservation ratio or 1:1 for each class of Farmland.</u></p> <p><u>If, prior to the issuance of a grading permit, the Applicant contends that satisfying mitigation options 1 and/or 2 is not financially feasible, the Applicant shall provide “substantial evidence” to the City Planning Director, as that term is defined in the CEQA Guidelines, including but not limited to expert opinion evidence supported by facts, to support its contention that such mitigation is not financially feasible. The Applicant’s substantial evidence shall be independently reviewed by the City’s financial experts or outside consultant, the cost of which shall be paid by the Applicant. If the City concurs with the Applicant’s conclusion that mitigation options 1 and/or 2 are not financially feasible, the Applicant shall provide mitigation at less than a 1:1 ratio, to the extent feasible, to minimize or reduce the level of impacts to Prime Farmlands and important Farmland.</u></p> <p>A-1: Before approval of a grading permits that will convert prime farmland as designated on the Department of Conservation’s most recent State Important Farmland Map, the applicant must record an agricultural conservation covenant, in a form approved by the City of Santa Paula, on other prime farmland currently under agricultural production within the City of Santa Paula’s Area of Interest.</p> <p>The area of the conservation covenant shall be based on the production value of the prime farmland being taken out of production. The production value shall be determined as the annual average of the total crop value for the four year period prior to the issuance of a grading permit. The conservation covenant shall provide for an equivalent amount of acreage to provide for the same</p>	
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		production value on the prime farmland being lost (e.g., if one acre of prime farmland being converted produces \$500,000 of crops per year, then an agricultural covenant shall be placed on one-half [½] acre of land producing \$1,000,000 per year.	
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ES-13-14 Table ES-2, Summary of Project Impacts, Agricultural Resources

<p><u>On-Site Agriculture</u> As stated previously, approximately 49 acres of the 53.81-acre Project Site are under agricultural cultivation and would be taken out of production as a result of implementation of the Specific Plan.</p> <p><u>Adjacent Agriculture</u> Existing agricultural lands producing avocados, citrus fruits, and a variety of row crops are located south of the Specific Plan area, south of State Route (SR) 126, and near the western boundary of the Specific Plan area, west of Adams Barranca. Agricultural operations to the south are separated from the Project Site by SR 126. The Specific Plan would not readily accommodate outdoor recreational activities for the general public or provide residential habitation components. As such, residential and general public exposure to dust, noise, and odors associated with nearby farming activities is considered less than significant. Therefore, based on the nature of the Project and design features to reduce any conflicts with adjacent agricultural land, potential impacts related to the conversion of off-site farmland to</p>	<p><u>Potentially Significant for On-Site Agriculture</u></p> <p>Less than Significant for <u>Adjacent Agriculture</u></p>	<p><u>Implementation of Mitigation Measure AG-1.</u></p>	<p><u>Significant and Unavoidable for On-Site Agriculture</u></p> <p>Less than Significant for <u>Adjacent Agriculture</u></p>
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nonagricultural uses would be less than significant.			
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ES-14 Table ES-2, Summary of Project Impacts, Cumulative Impacts Agricultural Resources

<p>Implementation of the General Plan would result in a long-term commitment to nonagricultural uses in areas that currently support prime and important Farmland soils, particularly within the West Area 2 and East Area 2 Expansion Areas. Since both of these expansion areas include statewide important farmland, development of these areas in accordance with the General Plan will result in cumulative impacts to agricultural resources within the City’s Planning Area. While development of these areas would be consistent with local planning policies, the cumulative impact on agricultural resources would be a significant and unavoidable impact.</p>	<p><u>Significant</u></p>	<p><u>Implementation of Mitigation Measure AG-1.</u></p>	<p><u>Significant and Unavoidable</u></p>
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ES-14-15 Table ES-2, Summary of Project Impacts, Air Quality

<p><u>According to the VCAPCD Guidelines, to be consistent with the AQMP, a project must conform to the local general plan and must not result in, or contribute to, an exceedance of the County’s projected population growth forecast.</u></p> <p><u>The Project’s addition of 1,510 employees would be consistent with the projections per SCAG. The planned uses would also be consistent with the City’s land use and zoning designation of the Project Site. As such, the</u></p>	<p>Less than Significant</p>	<p>No mitigation measures necessary.</p>	<p>Less than Significant</p>
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<p><u>Project would not conflict with the 2007 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in Ventura County.</u></p> <p>The proposed Project will not increase the amount of housing within the Specific Plan area, as no residences are planned to be built. The project employment increase would be approximately 1,510 employees and would not result in SCAG projections being exceeded. Therefore, as growth under the Specific Plan is not expected, the Project would not conflict with the 2007 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in Ventura County. Therefore, impacts regarding consistency with applicable air quality are considered less than significant.</p>			
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ES-15-16 Table ES-2, Summary of Project Impacts, Air Quality

<p><u>The VCAPCD's 25 lb/day threshold for ROG and NOx does not apply to construction emissions because such emissions are temporary. Emissions of TACs are localized, not regional, in nature; impacts related to construction activities would be limited to the area immediately surrounding the construction site within the Project area, and the VCAPCD does not recommend any thresholds of significance for their associated emissions. Instead, the VCAPCD bases the determination of significance on a consideration of the control measures to be implemented. If all appropriate emissions</u></p>	<p>Potentially Significant</p>	<p>AQ-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust-preventative measures using the following procedures, as specified by the VCAPCD (including without limitation, to VCAPCD Rule 50 (Opacity) and Rule 51 (Nuisance):</p> <ul style="list-style-type: none"> • On-site vehicle speed shall not to exceed 15 miles per hour (the Project Site will contain posted signs with the speed limit). • All on-site construction roads with vehicle traffic shall be watered <u>as necessary to prevent excessive dust periodically;</u> 	<p><u>Less than Significant</u></p>
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<p><u>control measures recommended by the VCAPCD Guidelines are implemented for a project, then construction emissions are not considered significant. All construction activities would adhere to the VCAPCD Rule 50 for Opacity, Rule 51 for Nuisance, and Rule 55 for Fugitive Dust.</u></p> <p>Construction activities associated with the construction of uses allowed with the Specific Plan would exceed VCAPCD threshold for ROG and NOx throughout the entire construction period and would be considered potentially significant.</p> <p>The construction emissions analysis was conducted for Year 2020, which was identified as the worst case year due to the overlapping construction activities of paving and architectural coating. ROG emissions from architectural coating exceeded the significance threshold.</p>		<ul style="list-style-type: none"> • Streets adjacent to the Project reach shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust. • All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day. • All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e., greater than 25 miles per hour averaged over one hour) so as to prevent excessive amounts of dust (contact the VCAPCD meteorologist for current information about average wind speeds). • All material transported off site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust. • The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust. <p>These control techniques shall be indicated on Project grading plans. The Applicant and/or its contractor shall be responsible for implementing these measures and compliance with this measure will be subject to periodic site inspections by the City.</p> <p>AQ-2: Project grading plans shall show that for the duration of construction, ozone precursor emissions from construction equipment vehicles must be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer’s specifications, to the satisfaction of the City Engineer. Compliance with this measure will be subject to periodic inspections of construction equipment vehicles by the Public Works Department.</p>	
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		<p>AQ-3: All trucks that will haul excavated or graded material on site shall comply with California Vehicle Code Section 23114 with special attention to subsections 2311(b)(F), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.</p> <p>AQ-4: A comprehensive Fugitive Dust Control Plan shall be developed by the Applicant and approved by the VCAPCD before the applicant commences grading and excavation operations. The Plan shall include all feasible, but environmentally safe, dust control methods. If a particular dust control method is determined or believed not to be feasible, or if it would conflict with other regulations, justification for not including the subject method shall be provided at the time the Fugitive Dust Control Plan is submitted to the VCAPCD. The Plan shall identify all fugitive dust sources, the means by which fugitive dust from each identified source will be minimized, and the schedule of frequency that each dust control method will be applied for each identified source.</p> <p>AQ-5: The construction contractor shall adhere to VCAPCD Rule 74.2 (Architectural Coatings) for limiting volatile organic compounds from architectural coatings. This rule specifies architectural coatings storage, clean up, and labeling requirements.</p>	
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ES-17-18 Table ES-2, Summary of Project Impacts, Air Quality

<p>The Project would generate average daily operational emissions that exceed the thresholds of significance recommended by the VCAPCD for ROG. Many of the measures that the VCAPCD recommends to reduce the significant operational impacts are features of the Project. The off-site transportation demand management (TDM) fund is a</p>	<p>Potentially Significant</p>	<p>AQ-6: Use low emission water heaters for residential, retail, and commercial water heating (Emissions reduction of 11 percent for ROG and 9.5 percent for NOx).</p> <p>AQ-7: Construct pedestrian and transit friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, and bikeways and or lanes <u>and bike racks</u>.</p>	<p>Significant and Unavoidable</p>
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<p>mitigation measure that can be used by project proponents for projects and program that exceed the ROG and NOx significance thresholds. The City of Santa Paula utilizes this program to mitigate the significant air quality impacts of projects with its jurisdiction. While impacts will be reduced with mitigation, they will remain significant and unavoidable.</p>		<p>Sidewalks and bikeways should be landscaped with trees (an approximately 4 percent emissions reduction).</p> <p>AQ-8: Provide shuttle/minibus service between the Project commercial and industrial land uses and the Project retail land uses and the Santa Paula downtown area during the lunchtime period (11:00 AM to 2:00 PM).</p>	
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ES-18-19 Table ES-2, Summary of Project Impacts, Air Quality

<p>According to the VCAPCD, if an individual project results in air emissions of criteria pollutants that exceed VCAPCD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. By applying VCAPCD's cumulative air quality impact methodology, implementation of the Project would result in an increase of ROG, an ozone precursor, and NOx, such that significant cumulative impacts would occur. Accordingly, cumulative impacts would be potentially significant.</p>	<p>Potentially Significant</p>	<p>AQ-12: The Applicant and/or its contractor must plant and maintain shade trees to reduce heat build-up on structures.</p> <p>AQ-13: The Applicant and/or its contractor shall prepare a TDM for review and approval by the City and VCAPCD, before the City issues building permits. The plan shall incorporate reasonable and feasible measures to reduce Project-related traffic and vehicle miles traveled. At minimum, the TDM Program shall include the following measures:</p> <ul style="list-style-type: none"> • Provision of connections to identified adjacent City or regional trails. • Provision of adequate way-finding features to direct pedestrians and bicyclists to nearby Project and City destinations, such as school, retail, and civic facilities. • Provision of homeowner information packets prior to close of escrow, identifying local and regional nonvehicular transportation options, and providing homeowners with basic information regarding telecommuting options. • Provision of adequate setbacks and design features such that the proposed future enhancement of 	<p><u>Significant and Unavoidable</u></p>
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		<p>commuter rail opportunities is not hindered by Project design.</p> <ul style="list-style-type: none"> • Construction of pedestrian- and transit-friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, bikeways, or lanes. Sidewalks and bikeways should be landscaped with trees. • Perform a traffic light synchronization study on streets impacted by Project development to reduce vehicle queuing time. <p>The Project shall offset the increase in daily emission over the 25 pounds of reactive organic compounds and nitrogen oxides per day either through the purchase of emission offsets or through the in-lieu fees shall be paid to fund off-site TDM facilities or services, if such a program has been established at that time. These fees can reduce emissions from non-Project-generated motor vehicle trips by funding programs to promote ridesharing, public transit, and bicycling. The amount of this financial contribution should be calculated on a pro-rate basis as determined to be equitable by the VCAPCD, and in accordance with the VCAPCD Guidelines. These fees should be paid prior to the issuance of building permits by the County. The applicant shall demonstrate the availability of the offsets or contribution to fund off-site TDM services to the VCAPCD through a contract or other agreement with the offset source(s), which binds the reduction to the Project.</p> <p>AQ 14: The Applicant and/or its contractor shall install EPA-certified wood burning stoves or fireplace inserts. If this is not feasible, then the installation of a ceramic coating on the honeycomb inside a catalytic combustor must be utilized or the use of natural gas fireplaces may be used as a feasible alternative.</p>	
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ES-20 Table ES-2, Summary of Project Impacts, Air Quality

<p>An HRA was prepared to determine whether diesel particulate emissions from construction under <u>within</u> the Santa Paula West Specific Plan will cause significant impacts to nearby sensitive receptors. In comparison to the <u>applicable</u> 10 in 1 million threshold level, carcinogenic risks do not exceed the level posing no significant risk. Therefore, impacts are less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation measures necessary.</p>	<p>Less than Significant</p>
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ES-21 Table ES-2, Summary of Project Impacts, Air Quality

<p>The uses allowed by the Santa Paula West Business Park Specific Plan do not include any operations that require large amounts of hazardous materials <u>that could pose a significant health risk</u>. Accordingly, the Project will not result in a significant impact with respect to use of hazardous materials during long-term operations.</p>	<p>Less than Significant</p>	<p>No mitigation measures necessary.</p>	<p>Less than Significant</p>
<p>The types of industrial activities that would occur with the Project are not known at this time, but would be evaluated at the time that permits to construct and operate are applied for from the APCD. Therefore, the potential impacts associated with objectionable odors will be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation measures necessary.</p>	<p>Less than Significant</p>

ES-21-22 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Air Quality

<p>The Project would not have a cumulatively considerable contribution to this impact with respect to conflicting with or obstructing the implementation of the applicable air quality plan.</p>	<p>Less than Significant</p>	<p>No mitigation measures necessary.</p>	<p>Less than Significant</p>
<p>Cumulative development activity within the City of Santa Paula would continue to implement dust control and equipment emissions mitigation measures during construction in accordance with City practices. Consequently, cumulative development within the city is not expected to cause a significant impact associated with construction activities.</p>	<p>Less than Significant</p>	<p>No mitigation measures necessary.</p>	<p>Less than Significant</p>
<p><u>The Project would not have a cumulatively considerable contribution to this impact with respect to conflicting with or obstructing the implementation of the applicable air quality plan.</u></p> <p><u>Cumulative development activity within the City of Santa Paula would continue to implement dust control and equipment emissions mitigation measures during construction in accordance with City practices. Consequently, cumulative development within the city is not expected to cause a significant impact associated with construction activities.</u></p> <p><u>However, because</u> Ventura County is currently in nonattainment for ozone, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Therefore,</p>	<p><u>Significant</u></p>	<p>Implementation of mitigation measures AQ-6 through AQ-8 and AQ-12 through AQ-134.</p>	<p>Significant and Unavoidable</p>

the emissions generated by the Project would be cumulatively considerable and are a significant and unavoidable impact.			
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ES-23 **Table ES-2, Summary of Project Impacts, Biological Resources**

<u>The Project includes the dedication of Open Space for the areas identified as Mixed Willow Riparian, and no development would occur within the Mixed Willow Riparian habitat area, potential impacts to vegetation communities are considered less than significant.</u>	<u>Less than Significant</u>	<u>No mitigation measures necessary.</u>	<u>Less than Significant</u>
Southern California black walnut (<i>Juglans californica</i>) is the only special-status plant species that was documented or determined to have a high likelihood of occurring within the Project Site. A total of 19 individual trees are located along the perimeter of the Project Site, mainly along the southwest boundary within the riparian habitat of the Adams Barranca and along the SR 126 right-of-way along the southeast boundary of the Project Site, <u>however, the Project does not currently propose to remove any of the 19 Southern California black walnut trees.</u> Therefore, i mpacts to special-status plant species (e.g. black walnut) are considered potentially significant.	Potentially Significant	BR-1 Before issuance of a grading permit, the Applicant must identify on grading plans, the locations of any protected trees (such as the Southern California black walnut, <i>Juglans californica</i>) and must include a report pertaining to preserving the tree(s) that could be affected by the grading activity. The report shall be prepared by a tree expert and shall evaluate the subdivider's <u>Applicant's</u> proposals for protected tree preservation, including avoiding grading, land movement, or other activity within the drip line of any protected tree. Prior to grading, the drip line must be fenced to prevent earthmoving equipment from inadvertently entering the drip line. In the event protected tree cannot be avoided, then the Applicant must provide a tree report in accordance with the City's Tree Protection Ordinance and must provide for the replacement or relocation of any protected trees that are to be removed, or would be subject to landmoving or grading within its drip line.	Less than Significant
The Southwestern willow flycatcher breeds in dense riparian habits along rivers and streams, and almost all southwestern flycatchers breeding habitat is within close	Potentially Significant	BR-3 <u>To avoid impacts to native nesting birds, the Applicant must retain a qualified biologist (with selection to be approved by the City) to conduct nest surveys in potential nesting habitat within the Project Site prior to</u>	Less than Significant

<p>proximity of water or saturated soils. The Project includes construction activity that could result in a temporary impact to the species if members are foraging or in the unlikely event they nest near the Project Site at the time of construction. Therefore, impacts are considered potentially significant.</p> <p>The Project is consistent with the recovery plan for this species because if southwestern willow flycatchers are located on site, they would not be permanently impacted. Although, the Project would result in potentially significant impacts to the southwestern willow flycatcher, mitigation measures are included within this EIR, and the Project includes an Open Space dedication along the western boundary to avoid impacts to habitat for southwestern willow flycatcher individuals in the Santa Clara River Watershed.</p>		<p><u>construction or site preparation activities. Specifically, within 30 days of ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys to determine if active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Wildlife Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. Surveys for special-status bird species can be conducted concurrently with general nesting bird surveys. Because birds known to use the Project area nest during the late winter, breeding bird surveys shall be carried out both during the typical nesting/breeding season (mid-March through September) and in January and February. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than 3 days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall include examination of trees, shrubs, and the ground within grassland for nesting birds, as several bird species known to occur in the area and are shrub or ground nesters, including burrowing owl, California horned lark, and mourning dove. In addition, due to the potential for least Bell's vireo and southwest willow flycatcher to exist, protocol surveys should be completed prior to the start of construction.</u></p> <p>BR-4 <u>If active nests are found, clearing and construction activities within 300 feet of the nest (500 feet for raptors) shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the qualified biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel</u></p>	
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		<p><u>shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts to these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.</u></p> <p>Implementation of mitigation measure BR-2 would ensure that impacts to Southwestern willow flycatcher habitat, Adams Barranca, would remain less than significant.</p>	
<p>The least Bell's vireo was not observed during the Project surveys; however, Adams Barranca provides potential habitat for the species. Impacts are considered potentially significant in the unlikely event this species nests on site or in the immediate vicinity and is subject to disturbance from construction activity.</p> <p>The Project is consistent with the recovery plan for this species because the least Bell's vireo habitat present on the site would not be impacted. The Project would result in potentially significant impacts to the least Bell's vireo. However, mitigation measures are included within this EIR, and the Project would include an Open Space dedication along the western boundary to avoid impacts to habitat for least Bell's vireo individuals in the Santa Clara River Watershed.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure BR-3 and BR-42.</p>	<p>Less than Significant</p>

<p>Although, \mp the Pallid bat was not observed during the Project surveys, Adams Barranca provides foraging and roosting habitat for the species. Construction under the Specific Plan could result in potentially significant impacts to pallid bats.</p> <p>The Hoary Bat was not observed during the Project Surveys, however, Adams Barranca provides foraging and roosting habitat for the species. This species is not expected to breed in Adams Barranca but may use the habitat for roosting, and the agricultural areas of Project Area for foraging.</p>	<p>Potentially Significant</p>	<p>BR-6 To avoid <u>potential</u> impacts to the Pallid bat (<i>Antrozous pallidus</i>) and the Hoary Bat (<i>Lasiurus cinereus</i>), the Applicant must retain a qualified biologist (with selection to be reviewed by the City) to conduct roosting bat surveys within the Specific Plan area prior to site preparation activities. Thirty days before ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys in accordance with standard protocols to determine if roosting western red bats are present in the construction zone or within 300 feet of the construction zone. Roosting bat surveys shall be carried out from March through September. Surveys for special-status bat species may be conducted concurrently with nesting bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than three days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall include examination of trees and large shrubs in which this species is known to roost. Any bats found outside of the breeding season (May through August) shall be relocated by having a qualified biologist remove the bat from the roost. If roosting female bats are found with young during the breeding season (May through August) clearing and construction activities within 300 feet of the roost, shall be postponed or halted until the roost is vacated and juveniles have been weaned, as determined by the biologist. Limits of construction to avoid an active roost site shall be established in the field with flagging, fencing, or other appropriate barriers. Construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active roost areas to ensure that no</p>	<p>Less than Significant</p>
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		inadvertent impacts on these roosts will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of these bat species.	
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ES-27-32 Table ES-2, Summary of Project Impacts, Biological Resources

No active bird nests were observed at the time of survey; however, suitable nesting habitat is present within the avocado orchard, ornamental trees within the Project area, and adjacent trees to the Project Site and within Adams Barranca. However, impacts to nesting birds may be potentially significant.	Potentially Significant	<p><u>Implementation of mitigation measure BR-3 and BR-4.</u></p> <p>BR-3 — To avoid impacts to native nesting birds, the Applicant must retain a qualified biologist (with selection to be reviewed by the City) to conduct nest surveys in potential nesting habitat within the Project Site prior to construction or site preparation activities. Specifically, within 30 days of ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys to determine if active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Wildlife Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. Surveys for special status bird species can be conducted concurrently with general nesting bird surveys. Because birds known to use the Project area nest during the late winter, breeding bird surveys shall be carried out both during the typical nesting/breeding season (mid-March through September) and in January and February. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than 3 days shall have elapsed between the last survey and the commencement of ground disturbance</p>	Less than Significant
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		<p>activities. Surveys shall include examination of trees, shrubs, and the ground within grassland for nesting birds, as several bird species known to occur in the area and are shrub or ground nesters, including burrowing owl, California horned lark, and mourning dove.</p> <p>BR-4 If active nests are found, clearing and construction activities within 300 feet of the nest (500 feet for raptors) shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the qualified biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts to these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.</p>	
<p>Development under the Specific Plan would require the removal of the agricultural drainage ditch that bisects the Project Site and is considered State Waters pursuant to the Fish and Game Code and the Clean Water Act. Other state and federal jurisdictional waters (i.e., those within Adams Barranca) would be preserved through an Open Space dedication and prevention of construction activities within the Barranca. <u>All Project impacts to ACOE and CDFW jurisdictional areas are considered potentially significant, and would be mitigated to a less than</u></p>	<p>Potentially Significant</p>	<p>BR-7 Before the issuance of a grading permit for areas that require state permits, the applicant shall coordinate with the CDFW to verify the impact to state-protected waters and associated vegetation on the Project Site. A Streambed Alteration Agreement (SAA) must be obtained, and mitigation measures recommended by the CDFW as part of the SAA shall be implemented. The SAA shall be provided to the City prior to issuance of a grading permit.</p> <p>The Applicant must mitigate for impacts to jurisdictional waters as administered by the CDFW jurisdiction by restoring habitats within those jurisdictions acceptable</p>	<p>Less than Significant</p>

<p><u>significant level through the conditions imposed pursuant to the Project's 404, 401, and 1602 permits/agreement as well as by mitigation measures identified in this EIR.</u></p>		<p>to the resource agency. Habitat must be mitigated onsite or within the same watershed, if feasible.</p> <ul style="list-style-type: none"> • The mitigation site(s) shall have been evaluated and selected on the basis of their suitability for use as riparian mitigation areas. • The mitigation area shall provide procedures to prepare soils in the mitigation area, provide detailed seeding/planting mixtures, provide seeding/planting methods, and other procedures that will be used for successful re-vegetation. • Impacts to jurisdictional waters shall be avoided to the extent feasible in the design phase of the Project. • Maintenance and monitoring requirements shall be established, including quarterly and annual monitoring reports to CDFW. <p>BR-8 Prior to the issuance of a grading permit for areas that require state or federal permits, the applicant and/or its contractor shall coordinate with the Army Corps of Engineers (ACOE) to verify the impact to federally regulated waters on the Project Site. A Nationwide Permit (NWP) shall be obtained and mitigation measures recommended by the ACOE and National Marine Fisheries, as part of the NWP shall be implemented. The NWP shall be provided to the City prior to initiating construction of the bridge crossing Santa Paula Creek.</p> <p>Areas determined to be federally regulated by the ACOE shall also fall under the jurisdiction of the Regional Water Quality Control Board (RWQCB), and a Clean Water Act Section 401 Water Quality Certification (401 Certification) will be required from the RWQCB for impacts to those areas.</p> <p>BR-9 For impacts to Regional Board jurisdiction, the Applicant shall:</p>	
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		<ul style="list-style-type: none"> • Establish, reestablish, rehabilitate, and/or enhance a minimum of 1:1 mitigation-to-impact ratio) on site; or • Provide a one-time in-lieu fee to a Regional Board–approved mitigation bank and/or in-lieu fee program within the Santa Clara River Watershed (at a minimum 1:1 mitigation-to-impact ratio) to establish, re-establish, rehabilitate, and/or enhance a minimum of 1.27 acres of Regional Board jurisdiction; or • A combination of on-site and/or off-site compensatory mitigation options, as described above. <p>BR-10 As mitigation impacts to CDFW jurisdiction, the Applicant shall:</p> <ul style="list-style-type: none"> • Establish, reestablish, rehabilitate, and/or enhance a minimum of 1:1 mitigation-to-impact ratio acres of CDFW jurisdiction for loss of State Waters; or • Provide a one-time in-lieu fee to a CDFW-approved mitigation bank and/or in-lieu fee program within the Santa Clara River watershed (at a minimum 1:1 mitigation-to-impact ratio) to establish, re-establish, rehabilitate, and/or enhance a minimum of 1:1 CDFW jurisdiction area; or <p>A combination of on-site and/or off-site compensatory mitigation options, as described above.</p>	
<p>The development of the Project Site would increase the number of nighttime light and glare sources on the site. Light and glare can “spill over” into adjacent open space areas, increasing the level of light currently experienced there. Nighttime light can disturb breeding and foraging behavior and can potentially alter foraging and breeding behavior of nocturnal birds, mammals, and</p>	<p><u>Less than Significant</u> Potentially Significant</p>	<p>Implementation of mitigation measure BR-2. <u>No mitigation necessary.</u> <u>Implementation of mitigation AES-1 which includes the installation of low intensity, low-glare design, and hooded to direct light downward preventing spillover into adjacent areas would further reduce impact.</u></p>	<p>Less than Significant</p>

<p>invertebrates, which is considered a potentially significant impact. <u>Section 4.6 of the Specific Plan for the proposed Project addresses lighting guidelines for the Project Site, including but not limited to, height of lighting, requirements for screened lighting, and submittal of a lighting plan to the police Chief or designee for approval prior to issuance of a building permit. Impacts from lighting and glare would be considered less than significant.</u></p>			
<p>Development under the Project can be expected to increase human activity near Adams Barranca, which could result in an increase in the frequency of human encroachment into the Barranca when compared to existing conditions. The Open Space <u>area</u> designations of the Specific Plan, upland buffers from the riparian area and development under the Project, and the Project characteristics that would provide predominantly indoor daytime work areas would minimize any potential for increase human disturbance to the Adams Barranca. Therefore, indirect impacts from human encroachment would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>Invasive exotic species introduced as landscaping could be dispersed by stormwater, wind, or wildlife, or by various other means to natural habitats in the area, including Adams Barranca and other downstream water bodies, such as the Santa Clara River. Impacts from the introduction of invasive exotic landscape plants could be potentially significant.</p>	<p>Potentially Significant</p>	<p>BR-2 Before issuance of a grading permit for development within the Specific Plan area, a landscaping and irrigation plan must be prepared and must incorporate the planting of native vegetation and use of water conserving irrigation. The landscaping and irrigation plan must be prepared by a licensed landscape architect, and use native plant and tree species. The landscape and irrigation plan must be submitted to the City of Santa Paula Planning Department for review and approval.</p>	<p>Less than Significant</p>

		<p>Nonnative plants or vegetation must be avoided in future development areas. The landscaping plans within common areas of development areas must include appropriate provisions to prevent other invasive plant species from colonizing remaining natural areas. These provisions must include the following: (a) review and screening of proposed plant palette and planting plans to identify and avoid the use of invasive species; (b) weed removal during the initial planting of landscaped areas; and (c) the monitoring for and removal of weeds and other invasive plant species as part of ongoing landscape maintenance activities. The frequency and method of monitoring for invasive species must be determined by a qualified botanist.</p> <p>For areas adjacent to Adams Barranca riparian corridors, the plan must provide for adequate landscaping to reduce indirect impacts including attenuation of noise and reduction of nighttime lighting and glare.</p>	
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ES-34 Table ES-2, Summary of Project Impacts, Biological Resources

<p>Adams Barranca, located along the western border of the Project Site could provide a wildlife movement corridor with linkage between the foothills of the mountains north of the City and the Santa Clara River, <u>however, the Project does not propose to obstruct or develop in the Barranca. The Project would not result in potentially significant impacts to the movement of resident or migratory fish or terrestrial wildlife species.</u> No historical or active raptor nests or communal roosts exist at the Project Site or within 100 feet of any area that is or will be subject to development within the Project Site. Raptors are mobile species with</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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<p>generally large home ranges, they are capable of compensating for the loss of small acreages of foraging habitat in a local area by moving to other suitable foraging habitats. Therefore, development of the Project would not eliminate significant raptor foraging areas or limit raptors' access to food resources, making potential impacts to raptors due to the development of the Project less than significant.</p>			
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ES-35 Table ES-2, Summary of Project Impacts, Biological Resources

<p><u>The Project is consistent with the recovery plan for this the least Bell's vireo because the least Bell's vireo habitat present on the site would not be impacted. All potential impacts to the least Bell's vireo during construction would be mitigated by measures are included in this EIR, and the Project would include an Open Space dedication along the western boundary to avoid impacts to habitat for least Bell's vireo individuals in the Santa Clara River Watershed.</u></p>	<p><u>Potentially Significant</u></p>	<p><u>Implementation of mitigation measure BR-2.</u></p>	<p><u>Less than Significant</u></p>
<p><u>All potential impacts to the southwestern willow flycatcher during construction would be mitigated by measures included in this EIR, and the Project includes an Open Space dedication along the western boundary to avoid impacts to habitat for southwestern willow flycatcher individuals in the Santa Clara River Watershed. The southwestern willow flycatchers would not be permanently impacted, and therefore the Project is consistent with the recovery plan.</u></p>	<p><u>Potentially Significant</u></p>	<p><u>Implementation of mitigation measure BR-2.</u></p>	<p><u>Less than Significant</u></p>

ES-35-36 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Biological Resources

<p><u>Most wildlife species that could be expected to use the Project Site are species that are adapted to the disturbance that is caused by human-induced activities. Because of the present condition of the Project Site and the surrounding lands, it is unlikely that development of the site would contribute significantly to cumulative adverse impacts to regional flora and fauna. However, the loss of habitat associated with development of the Project area would contribute to the overall cumulative loss of biological resources in the Santa Paula region. Given that the impacted habitat within the Project area consists primarily of agricultural and urban developed land, and the impacted waters are small (less than 1 acre), the incremental contribution of the Project to this habitat loss is not cumulatively considerable.</u></p>	<p><u>Less than Significant</u></p>	<p><u>No mitigation necessary.</u></p>	<p><u>Less than Significant</u></p>
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ES-38 Table ES-2, Summary of Project Impacts, Cultural Resources

<p>A majority of the Project Site has been extensively farmed with various row crops and orchards, which has continually disturbed the surface of the soils. While the Project Site does not contain any known sensitive archaeological resources within the disturbance area, the general Santa Clara River Valley is considered sensitive, and there is potential for unknown resources to be uncovered by activities, such as grading, that disturb the ground surface.</p>	<p>Potentially Significant</p>	<p>CUL-3: In the event that previously unidentified archaeological resources are discovered during building construction, the contractor must cease work in the immediate area and the City Planning Director shall be contacted. An independent qualified archaeologist, retained by the City at the expense of the applicant, must assess the significance of the find and make mitigation recommendations, <u>which shall be implemented to the extent feasible.</u></p>	<p>Less than Significant</p>
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ES-39 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Cultural Resources

<p><u>Potential impacts to cultural resources within the Project Site would be mitigated to less than significant with implementation of mitigation measures. Other Specific Plan projects that would likely have similar potentially significant impacts to paleontological, archaeological, and historic resources include the remainder of West Area 2, Adams Canyon, Fagan Canyon, and East Area 1 Specific Plan and East Area 2 Projects. The Project, in combination with other currently planned projects, may result in the potential for a cumulatively significant contribution to significant cumulative impacts. However, mitigation measures would reduce the potentially significant cumulative contribution to paleontological, archaeological, and historical resources.</u></p>	<p><u>Less than Significant</u></p>	<p><u>No mitigation necessary.</u></p>	<p><u>Less than Significant</u></p>
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ES-40 Table ES-2, Summary of Project Impacts, Geology and Soils

<p>The Specific Plan area could be subject to strong ground shaking in the event of an earthquake originating along one of the <u>nearby faults listed in Table 4.6-1</u> (or another active or potentially active in the Southern California area, such as the San Andrea Fault). Construction allowed by the Specific Plan will be required to comply with the version of the CBC in effect at the time individual building permits are obtained. The Project will not expose residents to unknown safety issues associated with seismicity (including ground</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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shaking), and potential impacts are less than significant.			
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ES-41 Table ES-2, Summary of Project Impacts, Geology and Soils

<p>Most of the Project Site lies within a liquefaction hazard zone, an area where the historic occurrence of liquefaction or groundwater conditions indicate a potential for ground displacements as a result of liquefaction, as designated by the State of California and the City of Santa Paula. Settlement caused by ground shaking is often not uniformly distributed, which can result in differential settlement. If settlement occurs, it could result in damage to improvements. Seismic settlement could occur on the site and is thus considered a potentially significant impact.</p>	Potentially Significant	<p>G-1: Additional explorations must be performed at the tentative tract map and grading plan review stages of the development planning. The purpose of the explorations would be to establish required removal depths and delineate any portion of the Project Site deemed susceptible to seismically induced settlement. <u>The Project shall comply with all CBC/UBC requirements for seismic safety.</u></p>	Less than Significant
<p>The native topsoil and alluvial soils in the annexation area may be moderately susceptible to erosion. Construction activities would comply with erosion control requirements, including <u>existing</u> grading and dust control measures, imposed by the City pursuant to grading permit regulations. After construction, the project may result in a limited degree of soil erosion effects from vegetated areas. However, in accordance with NPDES requirements, the project would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of each development within the Specific Plan. While BMP design features would be developed with more refined engineering for each</p>	Potentially Significant	<p>G-2: Detailed, design-level geotechnical investigation reports for all future subdivision and other discretionary development approvals must be submitted to the Public Works Director, or designee, for approval. In addition, grading plans and geotechnical reports prepared by a licensed Engineering Geologist (approved by the Public Works Director) must be provided to the Public Works Director, or designee, before the City issues grading building permits for individual development projects within the Project Site. Requirements for the geotechnical reports and compliance are described below.</p> <ul style="list-style-type: none"> The Engineering Geologist must make recommendations to address any seismically induced settlement within portions of the Project Site. In particular, seismically induced settlement 	Less than Significant

<p>development prior to implementation of the above requirements, impacts associated with erosion and sedimentation are considered potentially significant.</p>		<p>must be addressed in the western parts of the Project Site, where preliminary geotechnical investigations determined that the area may experience up to several inches of seismically induced settlement in the event of strong ground motion.</p> <ul style="list-style-type: none"> • The Engineering Geologist must inspect and certify that any expansive soils underlying individual building pads and all roadway subgrades have been either removed or amended in accordance with construction specifications, and make site-specific recommendations for grading, drainage installation, and foundation design, as appropriate. • The Public Works Director, or designee, must ensure that all soils and engineering report recommendations are incorporated into the project engineering and construction plans, including soils tests to ensure that it meets the soil classifications assumed in the soils reports, and that soils meet the CBC requirements. • All Project plans as determined necessary by the Public Works Director, or designee, including Grading and Construction Plans, must be reviewed and stamped by a Project soils engineer and submitted to the Public Works Director, or designee, for review and verification that all requirements are incorporated before the City issues grading or construction permits. • The Applicant and/or contractor must retain a licensed soils engineer acceptable to the Public Works Director, or designee, to review all construction plans for consistency with the soils reports and to monitor on-site grading and construction to ensure the conditions at the Project Site do not substantially change the requirements of report recommendations for design-level geotechnical investigations. The project soils 	
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		<p>engineer must monitor grading and construction activity and report observations to the Public Works Director, or designee. The Public Works Director, or designee, will conduct field inspections as needed.</p>	
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ES-44-45 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Geology and Soils

<p><u>At a minimum, all development occurring within the City of Santa Paula would be subject to CBC and construction standards relative to seismic and other geologic conditions that are prevalent within the region. Also, individual project geotechnical investigation reports, required prior to permit approval, would provide recommendations to account for site-specific design requirements to avoid subjecting on- and off-site properties to geologic hazards, in accordance with the CBC. With regard to erosion and sedimentation, development under the Santa Paula West Specific Plan and related projects are required to implement a SWPPP during construction, as required by the NPDES permit, to minimize impacts to off-site properties from the effects of erosion. The Project will meet the applicable standards and will sufficiently reduce its incremental cumulative geology and soil impacts to a less than significant cumulative impact.</u></p>	<p><u>Less than Significant</u></p>	<p><u>No mitigation necessary.</u></p>	<p><u>Less than Significant</u></p>
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ES-45 Table ES-2, Summary of Project Impacts, Greenhouse Gasses

<p><u>GHG emissions reductions would be achieved through energy-efficient lighting and building design; installation of low-flow appliances; and water conservation. The methods used to establish this relative reduction are consistent with the approach used in the CARB’s Scoping Plan for the implementation of AB 32 through 2020. The Project’s features and GHG reduction measures make the Project consistent with the goals of AB 32. Therefore, the Project will result in a less than significant contribution to cumulatively significant GHG emissions.</u></p> <p>Given the Specific Plan’s consistency with state and county GHG emission reduction goals and objectives, the Specific Plan’s contribution to the cumulative impact of greenhouse gas emissions would not be cumulatively considerable and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs (i.e., the 2014 Updated Scoping Plan). Similarly, related projects would also be anticipated to comply with these same emissions reduction goals and objectives. Therefore, cumulative impacts with respect to greenhouse gas emissions would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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ES-46-47 Table ES-2, Summary of Project Impacts, Hazards and Hazardous Materials

<p><u>Construction of the Project would involve deliveries and disposal of hazardous materials such as fuels, oils, solvents, and other equipment maintenance and building materials.</u> Spills or leakages encountered during construction and hauling would be temporary and would be required to be remediated in accordance with the State and local regulations for hazardous waste cleanup. As such, impacts from the use and handling of hazardous materials would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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ES-47-48 Table ES-2, Summary of Project Impacts, Hazards and Hazardous Materials

<p>If the railroad is commissioned for service within the future, any transport of hazardous materials would comply with US Department of Transportation (USDOT) Federal Railroad Administration (FRA) safety regulations. Therefore, the probability of an accident involving the transport of hazardous materials within proximity to the Project Site is considered to be <u>very low unlikely</u>. Impacts would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p>During construction of the Project, delivered materials to the site could contain hazardous materials, such as fuels, solvents, oils, coatings, etc. The event of a spill or release related to these hazardous materials could cause a short-term threat of exposure to nearby schools and residential areas along SR 126 and W. Telegraph Road. Therefore, the Project would</p>	<p>Potentially Significant</p>	<p>HM-1: Prior to demolition and construction activities on the Project Site, the Applicant shall submit verification to the City of Santa Paula Building and Safety Department that an asbestos survey has been conducted on any buildings and irrigation pipelines that are to be demolished or removed from the Project Site. If asbestos is found, the Applicant shall follow all procedural requirements and regulations of the VCAPCD Rule</p>	<p>Less than Significant</p>

<p>have potentially significant impacts related to the transport of hazardous materials during construction activities.</p> <p><u>The Project Site has been historically used for agricultural uses for more than 75 years, it is possible that residual pesticides may be exposed during grading and excavation activities. The limited Phase II ESA conducted for the Project Site determined that exposure of residual pesticides is considered low. However, soil testing may not always indicate of every condition within the Project, and clearing of existing debris or soils could uncover hazardous material contamination not previously known to occur on site. Therefore, potential impacts related to the presence of hazardous substances would be potentially significant.</u></p>		<p>62.7 to properly dispose of all on-site ACM's before general demolition activities commence.</p> <p>HM-2: Prior to demolition and any renovation activities on the Project Site, the Applicant shall submit verification to the City of Santa Paula Building and Safety Department that a lead-based paint survey has been conducted at all existing buildings located on the Project Site. If lead-based paint is found, the Applicant shall follow all OSHA procedural requirements and regulations for its proper removal and disposal before general demolition activities commence.</p> <p>HM-3: Prior to disposal, all fluorescent light fixtures within the existing buildings shall be inspected for PCB content labels throughout demolition of the Project Site.</p> <p>HM-4: Pole-mounted transformers, light ballasts, or other equipment suspected to contain PCBs must be inspected for the presence of PCBs prior to before any disturbance or removal. All equipment found to contain PCBs must be removed and disposed in accordance with all applicable local, State and Federal regulations including but not limited to California Code of Regulations Title 22, 40 CFR Part 261, and EPA 40 CFR. Utility Plans prepared as part of building permit review must include notes requiring inspection and plan for removal and disposal.</p> <p><u>HM-5: In the unlikely event that hazardous materials are encountered during grading or excavation activities anywhere on the Project Site, earthwork must be temporarily suspended in order to coordinate investigation/remediation efforts with the oversight of the Santa Paula Fire Department. An environmental professional (e.g. a professional geologist) is recommended to provide oversight and project monitoring to ensure the health and safety of all workers. A remedial plan consistent with federal and state remedial requirements, must be developed by a professional geologist approved by the City and submitted to the City Planning Director, or</u></p>	
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		<u>designee, for approval as required before continued work in the area.</u>	
The Project Site has been historically used for agricultural uses for more than 75 years, it is possible that residual pesticides may be exposed during grading and excavation activities. The limited Phase II ESA conducted for the Project Site determined that exposure of residual pesticides is considered low. However, soil testing may not always indicate of every condition within the Project, and clearing of existing debris or soils could uncover hazardous material contamination not previously known to occur on site. Therefore, potential impacts related to the presence of hazardous substances would be potentially significant.	Potentially Significant	HM-5: In the unlikely event that hazardous materials are encountered during grading or excavation activities anywhere on the Project Site, earthwork must be temporarily suspended in order to coordinate investigation/remediation efforts with the oversight of the Santa Paula Fire Department. An environmental professional (e.g. a professional geologist) is recommended to provide oversight and project monitoring to ensure the health and safety of all workers. A remedial plan must be developed by a professional geologist approved by the City and submitted to the City Planning Director, or designee, for approval as required before continued work in the area.	Less than Significant

ES-49 Table ES-2, Summary of Project Impacts, Hazards and Hazardous Materials

The Project Site is not within 0.25 miles of an existing school. The Project would <u>may</u> involve the use of hazardous materials on site typical of industrial-type uses. The storage and disposal of these hazardous materials on the Project Site would comply with City and SPFD regulations and standards. Therefore, impacts would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
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ES-51 Table ES-2, Summary of Project Impacts, Hazards and Hazardous Materials

The Specific Plan area has the potential for residents and employees to encounter human-made and natural hazards, which could cause undue hardship to residents and employees.	Less than Significant	No mitigation necessary.	Less than Significant
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<p>The working population within the Specific Plan would be made aware of such disaster plans through public education and outreach activities. In addition, the Project would comply with the SPFD’s recommended standards for emergency accessibility and circulation. Thus, the Project’s operational impacts on the implementation of the Ventura County Hazard Mitigation Plan would be considered less than significant.</p>			
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ES-52 Table ES-2, Summary of Project Impacts, Hazards and Hazardous Materials

<p>Construction activities of the Project may require the closure of vehicle travel lanes. The City’s designated evacuation routes are along SR 126 and SR 150. While, SR 126 runs along the southern boundary of the Project Site, construction activities of the Project are not anticipated to interfere with access to the roadway or interfere with operation of the County’s Hazard Mitigation Plan. Emergency access and potential traffic access impacts would <u>be</u> less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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ES-53 Table ES-2, Summary of Project Impacts, Hazards and Hazardous Materials

<p>The Specific Plan is <u>not</u> located not within a CAL FIRE designated LRA or SRA. As the Project would not expose employees or visitors to any increased risks to fire hazards on the site, impacts are considered to be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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ES-53 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Hazards and Hazardous Materials

<p><u>Although each related project has potentially unique hazardous materials considerations, it is anticipated that all hazardous materials delivered and hazardous waste removed from the Specific Plan area and each related project would be in accordance with Title 24 of the Code of Federal Regulations. Development of any projects would be required to comply with existing applicable laws and regulations pertaining to hazardous wastes, and the risk with identified hazardous material sites would be eliminated or reduced. Businesses would also be required to prepare a HMBP including an annual inventory of hazardous materials used on site and submit a business emergency plan to the City for an annual review.</u></p> <p><u>Development under the Specific Plan would comply with all applicable laws and regulations related to the transport, use, treatment, storage, and disposal of hazardous materials and fire prevention.</u></p>	<p><u>Less than Significant</u></p>	<p><u>No mitigation necessary.</u></p>	<p><u>Less than Significant</u></p>
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ES-54-55 Table ES-2, Summary of Project Impacts, Hydrology and Water Quality

<p>The development of the Project would increase the amount of impervious surfaces on the Project Site, which has the potential to increase runoff within the Project Site. The BMPs and the project design features would address the anticipated and expected pollutants of concern from operation of the Project. Degradation of water quality from the Project would be managed in accordance with all <u>existing</u> applicable federal, state, and</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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<p>local water quality rules and regulations to effectively minimize the Project’s impact on water quality. Accordingly, impacts would be less than significant.</p>			
<p>The Project will not result in a significant new demand for water and will not substantially deplete groundwater supplies. In addition, <u>the Project would use less water than the existing agricultural operations, and</u> the Specific Plan would incorporate design features such as bioswales, bioretention cells, infiltration trenches and permeable pavement to allow surface water runoff percolation. Therefore, the Specific Plan would not substantially interfere with groundwater recharge. There will be no substantial impact to local groundwater recharge. Therefore, impacts would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
<p><u>The Project does not alter the course of a stream or river, however</u> Site-clearing and grading operations have the potential for discharging sediment downstream during storm events. The Project would be required to develop a site-specific SWPPP in accordance with the NPDES Program General permits authorized under the Clean Water Act for Construction Activities. Adherence to the SWPPP and implementation of standard BMPs during construction would reduce the potential for increased siltation, erosion, and hazardous material spills. Through compliance with the SWPPP and standard BMPs, potential erosion and siltation, potential impacts will be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>

ES-56 Table ES-2, Summary of Project Impacts, Hydrology and Water Quality

<p>The Specific Plan would not substantially alter drainage patterns within the Project area, <u>nor alter a stream or river</u>. The storm drain system would collect on-site runoff and direct most of it to three separate detention basins prior to outletting into storm drains that connect to the existing culverts under SR 126. Peak flows would not exceed existing conditions, so there would not be adverse effects downstream. Therefore, impacts are considered less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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ES-58-59 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Hydrology and Water Quality

<p><u>The Project would not contribute to a cumulatively significant hydrology or water quality impact. First, the Project does not alter any streams or rivers. Second, each related project would be required to comply with NPDES requirements and local regulations designed to prevent polluted runoff from entering local storm drain systems and receiving water bodies during construction and after development, the cumulative impact to water quality would be less than significant. Implementation of applicable City requirements, including the standards of the Ventura County SQUIMP, on all new development within the watershed would reduce cumulative impacts to area hydrology to a less than significant level. Additionally, the Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there</u></p>	<p><u>Less than Significant</u></p>	<p><u>No mitigation necessary.</u></p>	<p><u>Less than Significant</u></p>
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<u>would be a net deficit in aquifer volume of the local groundwater table level.</u>			
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ES-60 Table ES-2, Summary of Project Impacts, Land Use

The Project would be consistent with the County of Ventura General Plan and Non-Coastal Zoning Ordinance, the Santa Paula General Plan and SPMC, the 2016 SCAG RTP/SCS, and with Ventura LAFCo <u>policies</u> . Therefore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project and impacts would be less than significant.	Less than Significant	No mitigation necessary.	Less than Significant
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ES-60 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Land Use

<u>No significant cumulative land use impacts from future development within the expansion areas would result as these areas will be developed in accordance with the City's General Plan. Additionally, environmental review will also be required and will be conducted prior to the adoption of future Specific Plans.</u>	<u>Less than Significant</u>	<u>No mitigation necessary.</u>	<u>Less than Significant</u>
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ES-61 Table ES-2, Summary of Project Impacts, Noise

An increase of 3 dB(A) or greater in traffic noise levels that occurs from Project-related activities would be considered significant if the resulting noise levels that occurs from Project-related activities would exceed the City Noise	Less than Significant	No mitigation necessary.	Less than Significant
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<p>Compatibility Matrix for “acceptable” exterior or interior noise levels. These roadway systems <u>will</u> do not experience an increase in noise levels of 3 dB(A) or greater. In addition, vehicle trips and traffic noise levels would remain the same with the proposed Beckwith Road extension and would not cause an increase of 3 dB(A) or greater due to Project-related activities. Therefore, the Santa Paula West Specific Plan Area would not result in <u>significant</u> noise impacts in the local and regional street system. Impacts along these roadway systems are considered less than significant.</p>			
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ES-62 Table ES-2, Summary of Project Impacts, Noise

<p>Assuming noise levels at 69.4 dB(A) within 50 feet from the railway centerline, interior noise <u>will</u> could be reduced to 44.4 dB(A), below the General Plan noise threshold of 45 dB(A), <u>in compliance with City Building Code requirements</u>. Therefore, potential interior noise within the proposed development would be considered less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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ES-62 Table ES-2, Summary of Project Impacts, Noise

<p>The surrounding land uses within 25 feet of the Project Site include the scattered residential uses immediately to the west. The construction near this portion of this site may include some earthwork and grading activities. While offsite surrounding land uses may experience vibration events, these would <u>be temporary and would</u> not be frequent and</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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impacts would be considered less than significant.			
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ES-63 Table ES-2, Summary of Project Impacts, Noise

<p>Average daily trips associated with construction activities would not result in a doubling of trip volume along study area roadways. Given that it takes a doubling of average daily trips on roadways to increase noise by 3 dB(A), <u>The average daily trips associated with construction activities would not result in a doubling of trip volume along study area roadways.</u> Noise-level increases associated with construction vehicle trips along major arterials in the City of Santa Paula and nearby roadways that are within the area (unincorporated County of Ventura) would be less than 3 dB(A), and potential impacts will be less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
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ES-65 Table ES-2, Summary of Project Impacts, Public Services

<p>The Specific Plan will result in an increase in the need for services from existing Santa Paula Fire Department facilities, equipment, and staff personnel. Under the terms of the Development Agreement, the Project Applicant and/or developer will be required to contribute funding through development impact fees to the City to contribute toward ongoing fire protection facilities and personnel costs. No new facilities would be required to serve the Project Site as a result</p>	Less than Significant	No mitigation necessary.	Less than Significant
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<p>of the implementation of the Specific Plan. As such, mitigation is not required.</p> <p>¶The SPFD will review all future building plans and require adequate fire-flow pressure and flow rates through automatic fire sprinkler systems, fire hydrants, and other design features where appropriate (as required by appropriate federal, state, and local fire code and building code requirements. As such, potential impacts with regard to fire-flow requirements will be less than significant.</p>			
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ES-67 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Public Services

<p><u>The City has regulations and ordinances in place to address impacts on public services (e.g., police, fire), including the provision and acquisition of new facilities and equipment. All planned development would be reviewed by the respective agencies and corresponding mitigation design features and payment of existing fees would be required prior to building permit issuance. Therefore, cumulative impacts associated with public services would be less than significant.</u></p>	<p><u>Less than Significant</u></p>	<p><u>No mitigation necessary.</u></p>	<p><u>Less than Significant</u></p>
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ES-68 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>If Beckwith Road is extended south to Faulkner Road, 10th Street and Harvard Boulevard intersection is forecast to operate at LOS D during the AM peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would</p>	<p><u>Potentially Significant</u></p>	<p>10th Street & Harvard Boulevard (Intersection 1) <u>No feasible</u> Mitigation measures are available from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible <u>physically feasible</u> mitigation. Given the constraints of the intersection and the</p>	<p>Significant and Unavoidable</p>
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<p>cause or contribute to significant traffic impacts at this intersection.</p>		<p>proposed bicycle lanes, <u>cumulative impacts to</u> this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these <u>improvements</u> mitigations were not considered <u>to be</u> as a feasible mitigation <u>measure</u>.</p>	
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ES-68 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>If Beckwith Road is extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street is forecast to operate at LOS D during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially Significant</p>	<p>TRA-1 Peck Road & Harvard Boulevard/Telegraph Road/Main Street (Intersection 8).This intersection could be mitigated to LOS C or better with the addition of one travel lane to both the northbound and southbound approaches on Peck Road and the addition of a northbound right overlap phase. The northbound lane configuration would be one right-turn lane, two through lanes, and one left-turn lane. The northbound right-turn movement would also have an overlap signal head installed to accommodate the overlap phase. The southbound lane configuration would be one shared through/right-turn lane, one through lane, and one left-turn lane.</p> <p>Since this is a cumulative impact, the Project applicant would <u>shall</u> be responsible for their fair share contribution for this mitigation improvement.</p>	<p>Less than Significant</p>
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ES-69 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>If Beckwith Road is not extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street would operate at LOS <u>D</u> during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C, traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure TRA-1.</p>	<p>Less than Significant</p>
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ES-70 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>The freeway segments currently operate at LOS C or better in both directions. Based on the significance threshold for the Los Angeles County CMP, the Project will <u>does</u> not operate at LOS F after the addition of project traffic and the Project does not cause a net increase in traffic demand of 2 percent of capacity or more. Therefore, the Project would result in less than significant impacts to freeway and multilane segments.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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ES-72 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions without the Project, 10th Street and Harvard Boulevard is expected to operate at LOS E during the AM Peak hour and LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions without the Project would</p>	<p>Potentially Significant</p>	<p>10th Street & Harvard Boulevard (Intersection 1) <u>No feasible</u> mMitigation measures <u>are available from prior major projects in Santa Paula were investigated along the Ojai Road corridor.</u> A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible <u>physically feasible</u> mitigation. Given the constraints of the intersection and the proposed bicycle lanes, <u>cumulative impacts to this intersection</u></p>	<p>Significant and Unavoidable</p>
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<p>cause or contribute to significant traffic impacts at this intersection.</p>		<p>cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these <u>improvements mitigations</u> were not considered <u>to be</u> as a feasible mitigation <u>measure</u>.</p>	
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ES-73 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions without the Project, Peck Road and Harvard Boulevard/Telegraph Road/Main Street is expected to operate at LOS E during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions without the Project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure TRA-1. This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.</p>	<p>Significant and Unavoidable</p>
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ES-74 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions without the Project, Peck Road and SR 126 EB On/Off Ramps/ Acacia Way is expected to operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions <u>with or</u> without the Project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure TRA-2.</p>	<p>Less than Significant</p>
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ES-74 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions without the Project, Faulkner Road and SR 126 WB On/Off Ramps is expected to operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated from future conditions <u>with or</u> without the Project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially Significant</p>	<p>TRA-4 Faulkner Road & SR-126 Westbound On/Off Ramps (Intersection 11). This intersection could be mitigated to LOS C or better by reconfiguring the westbound approach. The westbound approach can be restriped to provide one shared through/right-turn lane and two left-turn lanes. While the freeway on-ramp at this location currently provides two lanes, this improvement would require coordination with and approval by Caltrans.</p> <p>Since this is a cumulative impact, the Project applicant would be responsible for their fair share contribution for this mitigation improvement.</p>	<p>Less than Significant</p>
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ES-74 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, 10th Street and Harvard Boulevard would operate at LOS F during the AM and PM Peak hours. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic</p>	<p>Potentially Significant</p>	<p>10th Street & Harvard Boulevard (Intersection 1) <u>No feasible</u> Mitigation measures are available from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible <u>physically feasible</u> mitigation. Given the constraints of the intersection and the</p>	<p>Significant and Unavoidable</p>
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<p>generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>		<p>proposed bicycle lanes, <u>cumulative impacts to</u> this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these <u>improvements mitigations</u> were not considered <u>to be as</u> a feasible mitigation <u>measure</u>.</p>	
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ES-75 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street would operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C_T. <u>T</u>raffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially <u>S</u>ignificant</p>	<p>Implementation of mitigation measure TRA-1. This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario. Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.</p>	<p>Significant and Unavoidable</p>
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ES-75 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Peck Road and SR 126 EB On/Off Ramps/Acacia Way would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C₂. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure TRA-2.</p>	<p>Less than Significant</p>
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ES-76 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Faulkner Road and SR 126 WB On/Off Ramps would operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C₂. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure TRA-4.</p>	<p>Less than Significant</p>
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ES-76 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions with the Project, and with Beckwith Road extended south to Faulkner Road, Beckwith Road & Telegraph Road would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C₂. Traffic generated by the</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure TRA-3.</p>	<p>Less than Significant</p>
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proposed project would cause or contribute to significant traffic impacts at this intersection.			
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ES-76 Table ES-2, Summary of Project Impacts, Transportation and Traffic

Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, 10th Street and Harvard Boulevard would operate at LOS F during the AM and PM Peak hours. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially Significant	10th Street & Harvard Boulevard (Intersection 1) No feasible Mitigation measures are available from prior major projects in Santa Paula were investigated along the Ojai Road corridor. A beautification project, including bicycle lanes, is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a possible <u>physically feasible</u> mitigation. Given the constraints of the intersection and the proposed bicycle lanes, <u>cumulative impacts</u> to this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these <u>improvements</u> mitigations were not considered <u>to be</u> as a feasible mitigation <u>measure</u> .	Significant and Unavoidable
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ES-77 Table ES-2, Summary of Project Impacts, Transportation and Traffic

Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Peck Road and Harvard Boulevard/Telegraph Road/Main Street would	Significant	Implementation of mitigation measure TRA-1 . This intersection could be mitigated to LOS D with the same mitigation measure suggested for the Existing plus Project scenario.	Significant and Unavoidable
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<p>operate at LOS F during the AM Peak hour and LOS D during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>		<p>Full mitigation of this intersection under Cumulative plus Project conditions requires the addition of a second left-turn lane to the westbound approach on Main Street. The westbound approach on Main Street would have to be reconfigured to include one right-turn lane and dual left-turn lanes and maintain the exclusive or protected signal phasing for this turning movement. However, the implementation of dual left-turns at this location would require the acquisition of right-of-way on Main Street and relocation of existing grade crossing gates to accommodate the proposed intersection configuration, and so was not considered as a feasible mitigation.</p>	
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ES-77 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Peck Road and SR 126 Eastbound On/Off Ramps would operate at LOS F during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure TRA-2.</p>	<p>Less than Significant</p>
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ES-78 Table ES-2, Summary of Project Impacts, Transportation and Traffic

<p>Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Faulkner Road and SR 126 Westbound On/Off Ramps would operate at LOS F during the AM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C. Traffic generated by the proposed project</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure TRA-4.</p>	<p>Less than Significant</p>
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would cause or contribute to significant traffic impacts at this intersection.			
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ES-78 Table ES-2, Summary of Project Impacts, Transportation and Traffic

Under future conditions with the Project, and if Beckwith Road is not extended south to Faulkner Road, Beckwith Road and Telegraph Road would operate at LOS E during the PM Peak hour. The City of Santa Paula has defined the minimum desirable intersection level of service as LOS C ₂ . Traffic generated by the proposed project would cause or contribute to significant traffic impacts at this intersection.	Potentially Significant	Implementation of mitigation measure TRA-3 .	Less than Significant
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ES-79 Table ES-2, Summary of Project Impacts, Utilities - Wastewater

<p><u>Development of the Project will result in the removal of the existing septic tanks that currently serve the site. Once developed and occupied, uses within the Specific Plan area will generate wastewater that will be connected to the City's sewer system and conveyed through a series of pipelines to the WRF for treatment. Effluent from the treatment plant must comply with the SPMC to meet the requirements of the WDR permit issued to the City by the Los Angeles RWQCB.</u></p> <p>The treated effluent from the Project will not exceed applicable requirements, and the Project's potential impacts related to wastewater treatment are less than significant.</p>	Less than Significant	No mitigation necessary.	Less than Significant
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ES-79-80 **Table ES-2, Summary of Project Impacts, Utilities - Wastewater**

<p>The proposed Project would comply with AB 939 and AB-231 and the City's Construction and Demolition Diversion section of the Municipal Code, which states that demolition, construction, and remodeling shall divert 50 percent of waste tonnage from landfills. However, given that future landfill capacity may not be ensured through the life of the development of the Specific Plan, for many years after occupancy, impacts to solid waste would be potentially significant.</p>	<p>Potentially Significant</p>	<p>Implementation of mitigation measure SW-1.</p>	<p>Less than Significant</p>
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ES-80-81 **Table ES-2, Summary of Project Impacts, Utilities - Wastewater**

<p>Completion of proposed Project improvements would convey most of the wastewater flow to the POC along the existing sewer lines north of the site along Telegraph Road. In addition, the WRF has been designed to accept wastewater from the cumulative growth of the City under the General Plan, including all related projects. As such, the Project's contribution to cumulative wastewater system and treatment impacts would be less than significant.</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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ES-84 **Table ES-2, Summary of Project Impacts, Utilities - Water**

<p>The Specific Plan's demand for water use would meet be consistent with the projected development demands within the City. Therefore, the cumulative increase in water demand of related projects and build-out of</p>	<p>Less than Significant</p>	<p>No mitigation necessary.</p>	<p>Less than Significant</p>
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the City pursuant to the General Plan is considered less than significant.			
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ES-85 Table ES-2, Summary of Project Impacts, Utilities – Solid Waste

The proposed Project would comply with AB 939 and AB 231 and the City’s Construction and Demolition Diversion section of the Municipal Code, which states that demolition, construction, and remodeling shall divert 50 percent of waste tonnage <u>from landfills</u> . However, given that future landfill capacity may not be ensured through the life of the development of the Specific Plan, for many years after occupancy, impacts to solid waste would be potentially significant.	Potentially Significant	Implementation of mitigation measure SW-1 .	Less than Significant
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ES-86 Table ES-2, Summary of Project Impacts, Cumulative Impacts, Utilities

<p><u>Wastewater</u> <u>Completion of proposed Project improvements would convey most of the wastewater flow to the POC along the existing sewer lines north of the site along Telegraph Road. In addition, the WRF has been designed to accept wastewater from the cumulative growth of the City under the General Plan, including all related projects. As such, the Project’s contribution to cumulative wastewater system and treatment impacts would be less than significant.</u></p> <p><u>Water</u> <u>The Specific Plan’s demand for water use would meet the projected development demands within the City. Additionally, the</u></p>	Less than Significant	No mitigation necessary.	Less than Significant
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<p><u>Project would use less water than the existing agricultural operations. Therefore, the cumulative increase in water demand of related projects and build-out of the City pursuant to the General Plan is considered less than significant.</u></p> <p><u>Solid Waste</u></p> <p>The City would utilize the Toland Road Sanitary Landfill until the landfill reaches capacity. At the time Toland Road Sanitary Landfill closes, the City would utilize the capacity of the five remaining landfills previously used for solid waste disposal. The combined remaining capacity of the five landfills is estimated to last for 95 years, or an average of 19 years.</p> <p>As such, cumulative impacts would be less than significant because the six landfills discussed above have sufficient capacity for decades to service the development of the Specific Plan and other development requiring solid waste disposal.</p>			
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Section 2.0, Project Description

Page

Revision:

2.0-1

Project Objectives

1. Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in West Area 2 that reflects and complements the existing pattern and scale of development in Santa Paula, as envisioned in the City's General Plan;

2.0-27

Conceptual Grading Master Plan

The Specific Plan includes a Grading Master Plan for the earthwork needed to support development of the Project. The Grading Master Plan is shown in **Figure 2.0-14, Grading and Drainage Master Plan**. The Grading Master Plan provides for the cut and fill grading of the Project Site into a roughly 2 percent land gradient overall, which would maintain the existing gradient from north to south. Cut and fill grading will be conducted using on-site soils with an overexcavation and recompaction depth of approximately 6 feet. Grading will also raise portions of the Project Site above the flood hazard elevation, with up to 6 feet of fill to be placed along the western boundary near Adams Barranca. Grading over the Project Site includes an estimated 80,000 cubic yards of cut and 179,000 cubic yards of fill, requiring the import of approximately 99,000 cubic yards of soil. The finished grade of the Project Site will maintain the existing 2 percent maximum gradient, and yield roadways and blocks in the lower areas generally within the 0.5 percent to 2 percent gradient range.

2.0-28

General Plan Amendment, Rezone, and Annexation

The Project would implement the City's plans for a portion of the West Area 2 Planning Area as defined in the Santa Paula General Plan. The Project includes a series of related actions including ~~jurisdictional reorganization (annexation)~~, a General Plan Amendment (to the Land Use Element), ~~and the adoption of a Specific Plan and rezoning for the Project area,~~ approval of a Master Vesting Tentative Map, jurisdictional reorganization (annexation to the City of Santa Paula), encroachment permit by the California Department of Transportation for the construction of roadway and utility improvements in the State right-of-way

and California Public Utilities Commission approval for an at-grade crossing of the Ventura County Transportation Commission (VCTC) railroad.

2.0-31

Development Timeframe

Initial land development including, site clearing, grading, roadway construction, and improvements of the Project Site are anticipated to occur over an approximately 4-month period starting sometime in 2019. For purposes of the analysis within this Environmental Impact Report (EIR), construction of individual buildings is assumed to occur over approximately 10 years in response to market conditions. ~~Development of the Project is anticipated to occur over approximately 10 years or as market conditions allow. For purposes of the analysis within this Environmental Impact Report (EIR), development is expected to begin in 2017 and be completed by 2027. Construction would occur continuously during this 10-year period but would generally occur based on market and economic conditions to provide for orderly development.~~

2.0-31

City of Santa Paula

The City of Santa Paula, as Lead Agency, will require the following approvals, permits, and actions to implement the proposed ~~East Gateway Project~~ Santa Paula West Specific Plan Project:

General Plan Amendment for the West Area 2 Expansion Area;

Specific Plan Approval and rezoning;

~~Development Agreement~~

Approval of the Master Vesting Tentative Map;

Annexation to the City of Santa Paula;

Encroachment permit by the California Department of Transportation for the construction of roadway and utility improvements in the State right-of-way; and

California Public Utilities Commission approval for an at-grade crossing of the Ventura County Transportation Commission (VCTC) railroad.

Section 3.0, Related Projects

3.0-1 Related Projects

An estimated total of 1,770~~81~~ residential units and 1,077,021 ~~1,022,772~~ square feet of commercial and industrial facilities and 16 motel units (not including this Project) is pending, approved, under construction, or built. In addition, a total of 7,657 acres of expansion area is proposed for annexation into the City's boundaries.

3.0-2-3.0-4 Related Projects Table

3	NW corner of Foothill and Peck Road	Single-family units	<u>6379</u> du	Proposed <u>Conceptual</u>
6	220 W Main Street	Assisted-living apartment units	20 du	Completed <u>Occupied</u>
7	812/820 E Santa Barbara Street	Assisted-living apartment units	6 du	Completed <u>Occupied</u>
9	Cemetery and Santa Paula Street	Single-family units	8 du	Under Construction <u>Occupied</u>
30	250 S Hallock Drive	Mixed-use warehouse (w/dwelling unit)	7,800 sq. ft. + 1 du	Under Construction <u>Occupied</u>
Total residential units			1,770<u>86</u> du	
<u>37</u>	<u>132 W. Harvard</u>	<u>Fast Food Eatery</u>	<u>2,249 sq. ft.</u>	<u>Approved</u>
Total commercial			217,298 <u>219,547</u> sq. ft.	
29	18201 E Telegraph Road	Private self-storage facility	80,755 sq. ft.	Proposed <u>Plan Check</u>
30	250 S Hallock Drive	Mixed-use warehouse (w/dwelling unit)	7,800 sq. ft. + 1 du	Under Construction <u>Occupied</u>
15	East Area 1a	Light industrial	25,000 sq. ft. square feet	Approved
<u>38</u>	<u>630 Todd Lane</u>	<u>General industrial (O’Kote Pipe Factory)</u>	<u>52,000 sq. ft.</u>	<u>Approved</u>
Total industrial			805,474 <u>857,474</u> sq. ft.	

Source: City of Santa Paula Planning Department (2016~~8~~); City of Santa Paula General Plan, “Land Use Element” (2013); and Fehr & Peers, East Area 1 Traffic Study (May 2014).
Abbreviations: du = dwelling units; sq. ft. = square feet

Section 4.1, Aesthetics

Page

Revision:

4.1-12

Scenic Highways

The County of Ventura General Plan identifies SR 126 as an eligible county scenic highway.¹ The City of Santa Paula's General Plan Conservation and Open Space Element identifies SR 126 and SR 150 as man-made scenic resources.² SR 126 offers sweeping 360-degree views of the higher elevations of the surrounding mountains from throughout the travel corridor. Views include portions of the Topatopa Mountains and Santa Paula Peak to the north, and the South Mountain to the south. Where openings in landscaping or structural development along the right-of-way occur, wide-ranging views of agricultural lands are also available along the corridor, predominantly occurring outside the City's limits. As described previously, parts of the Project Site are blocked by existing vegetation; however, gaps in the vegetation allow the Project Site to enter public view along SR 126. a majority of the Project Site is visible from SR 126. This is due to the minimal landscaping, vegetation, and power lines that would obstruct views when seen from a moving vehicle.

4.1-16–4.1-17

Project Impacts

4.1.4 PROJECT IMPACTS

Threshold: Have a substantial adverse effect on a scenic vista?

Temporary Construction Impacts

Construction activities within the Project Site and off-site improvements, such as along Beckwith Road and Faulkner Road, could potentially be visible from SR 126 and Telegraph Road and other vantage points that currently have views of these areas. Additionally, there would be off-site improvements along SR 126 for the connection of Beckwith Road to the extended Faulkner Road. Initial land development, including site clearing, grading, roadway construction, and improvements of the Project Site are anticipated to occur over an approximately 4-month period starting in sometime in 2019. For purposes of the analysis within this EIR, construction of individual buildings is assumed to occur over

1 County of Ventura, *General Plan*, "Resources Appendix," (2011).

2 City of Santa Paula, *General Plan*, "Conservation and Open Space Element," (1998).

~~approximately 10 years in response to market conditions. Development of the Specific Plan would occur over a 10-year period or as market conditions allow. Construction activities would include various site preparation, vegetation removal, and grading activities.~~ As the Project Site is relatively flat and is at relatively low elevation, grading activities would include the import of approximately 99,000 cubic yards of soil to raise portions of the western areas above flood elevations from Adams Barranca flows. Finished grades not substantially also the existing be contours and would result in slightly reduced differences in elevations over the Project Site. The infrastructure improvements, such as water and sewer pipelines, and roadways would be constructed to meet the needs of the development as it progresses over time.

~~**Threshold: Have a substantial adverse effect on a scenic vista?**~~

Operational Impacts

4.1-17-4.1-18

Project Impacts

Development in accordance with the Specific Plan would result in an expanded urban fringe on the westerly limits. The Project would provide for the development of commercial and light industrial uses, along with roadways and open space across the 53.8-acre Project Site. Building heights would be consistent with the 1- to 2-story buildings having similar uses to the east of the Project Site, with a maximum building height of 35 feet and 45 feet for commercial/light industrial and industrial uses, respectively.

The more panoramic vistas that take in a sweeping breadth of the mountains and foothills forming the river valley and vistas overlooking the lower man-made and natural horizon features of the area would not be blocked through development under the Specific Plan. Rather, more immediate foreground and middle-distant open views across the Project Site would be replaced with structures. Landscaping within the Project Site could channel some views from the immediate surroundings. However, as previously stated, this development would not add an anomalous element to the viewshed because it would occur on the urban fringe of the City near existing light industrial and residential areas.

While implementation of the Project would result in the loss of views of the existing agricultural lands in the immediate foreground with the addition of

structures, circulation system, and supporting infrastructure, the urbanized appearance is similar to the adjacent uses, and in More distant scenic vistas views of the Santa Clara River Valley would not be significantly altered upon the development of structures on the Project Site. Therefore, the Project would result in less than significant adverse impacts to scenic vistas.

4.1-22

Mitigation Measures

The following mitigation measure would reduce the Project’s potentially significant impacts related to nighttime lighting to less than significant:

AES-1: Before the City issues grading permits, the applicant must prepare and submit a Lighting Plan to the City of Santa Paula Planning Director for approval that identifies the types of shielding that will be used for outside lighting and must comply with all applicable dark sky ordinances/regulations.

Section 4.2, Agricultural Resources

Page

Revision:

4.2-17-18

Project Impacts

The City of Santa Paula follows the CDC’s FMMP in identifying the conversion of state-defined prime soils and soils of statewide importance as an impact to agricultural resources. The FMMP Important Farmland Map for Ventura County identifies a total of 44.229 acres of prime farmland and 4.88 acres of farmland of statewide importance on the site (total of 49.108 acres). The Project Site is currently farmed by two organizations, Bender Farms and McGrath Farms. Bender Farms grows avocados on approximately 9.2 acres of land, and herbs on approximately 12.3 acres. McGrath Farms grows a variety of row crops on approximately 27.5 acres of land. Other areas contain the agricultural ancillary uses, such as packing facilities and equipment storage and maintenance yards, and are designated as developed.

Approximately 4.71 acres of land located within the current agricultural operation near Beckwith Road contains a farmworker housing unit and has thus been developed for uses other than agricultural. Further, this area of land does not meet any of the criteria identified in Government Code Section 56064. Therefore,

49.1 acres (53.81 acres–49.1 acres) of the Project Site would be considered Prime Agricultural Land under Government Code Section 56064.

Implementation of the Specific Plan would result in the conversion of the 49.1~~08~~ acres of both prime farmland and important farmland to urbanized uses and the conversion of 49.1 acres of Prime Agricultural Land, as defined in Government Code Section 56064.

With implementation of **Mitigation Measure AG-1**, the Applicant shall provide mitigation to the extent feasible, to minimize or reduce the level of impacts to farmland. However, ~~T~~the loss of 49.1~~08~~ acres of farmlands is considered a significant and unavoidable impact.

4.2-19

Project Impacts

As stated previously, approximately 49 acres of the 54-acre Project Site are under agricultural cultivation and would be taken out of production as a result of implementation of the Specific Plan. This includes approximately 9.2 acres of avocados, 12.3 acres of herbs, and 27.5 acres of other miscellaneous row crops. These areas would be developed with an office/industrial/business park that includes a variety of manufacturing, research and development, professional office, and limited commercial uses. Development under the Specific Plan would result in the loss of 49 acres of land currently under agricultural cultivation, of which 44 acres consists of prime farmland, and approximately 5 acres consists of farmland of statewide importance. **Mitigation Measure AG-1** would be implemented; however, ~~T~~this farmland conversion is considered a significant and unavoidable impact.

4.2-20

Adjacent Agriculture

As stated previously, existing agricultural lands producing avocados, citrus fruits, and a variety of row crops are located south of the Specific Plan area, south of State Route (SR) 126, and near the western boundary of the Specific Plan area, west of Adams Barranca. Agricultural operations to the south are separated from the Project Site by SR 126. SR 126 includes a transportation corridor that is approximately 160 feet wide and is raised above the existing grades of the Project Site and agricultural land to the south. There is no land use connectivity between the Project Site and these agricultural lands. Furthermore, portions of the

agricultural lands south of SR 126 are also within the City's CURB and the West Area 2 Expansion area, which would allow for future planning for similar light industrial uses as would occur under the Santa Paula West Specific Plan.

4.2-21–4.2-23

Cumulative Impacts

Implementation of the Project would reduce avocado, herb, and row crop production locally and within the County. The loss of approximately 49.108 acres would represent a fraction of a percent of the 93,376 acres of agricultural land harvested in the County in 2014. Of the 23,012 acres of avocado and cilantro harvested in the County in 2014, the Project would represent approximately 0.210 percent. However, the Project would contribute to the conversion of agricultural lands in the County to nonagricultural uses.

Implementation of the General Plan would result in a long-term commitment to nonagricultural uses in areas that currently support prime and important Farmland, particularly within the West Area 2 and East Area 2 Expansion Areas. Since both of these expansion areas include statewide important farmland, development of these areas in accordance with the General Plan will result in cumulative impacts to agricultural resources within the City's Planning Area. While development of these areas would be consistent with local planning policies, the cumulative impact on agricultural resources would be a significant and unavoidable impact.

~~Implementation of the General Plan would result in a long-term commitment to nonagricultural uses in areas that currently support prime soils, particularly within the flatland expansion areas (West Area 2 and East Area 2). Since development of proposed land uses within the expansion areas would occur over most prime and statewide important farmland, it is assumed that all prime soils within these areas could be impacted or rendered infeasible for further agricultural production. Implementation of **Mitigation Measure AG-1** would help to minimize impacts to farmland, however, the loss of high-quality agricultural soils, while only a small percentage of the total prime and statewide importance agricultural land in Ventura County, is considered both individually and cumulatively significant.~~

4.2-21

Mitigation Measures

AG-1: To reduce or minimize impacts to Prime Farmland, and Important Farmland, the Applicant shall provide mitigation through one, or some combination of, the following mitigation measures, prior to the issuance of a grading permit by the City:

1. The Applicant shall secure a conservation easement in perpetuity, on land officially designated by the State of California as Prime Farmland and Important Farmland. The mitigation ratio shall be 1:1 for each class of designated farmland, resulting in a conservation easement being placed on a total of 44.20 acres of Prime Farmland, and 4.88 acres of Important Farmland, within the State of California. The applicant may satisfy the Important Farmland mitigation requirement by conserving Prime Farmland; or
2. The Applicant shall make payments to a local, regional, or statewide organization whose purpose is to acquire agricultural conservation easements for Prime Farmland and Important Farmland, and has demonstrated a successful track record in doing so, over at least 5 years. If the applicant elects to pursue this option alone, or in combination with option 1, the Applicant shall demonstrate to the City Planning Director that it has paid funds sufficient to allow the state, regional, or local conservation organization to acquire conservation easements in perpetuity over Prime Farmland and important Farmland resulting in a mitigation conservation ratio or 1:1 for each class of Farmland.

If, prior to the issuance of a grading permit, the Applicant contends that satisfying mitigation options 1 and/or 2 is not financially feasible, the Applicant shall provide “substantial evidence” to the City Planning Director, as that term is defined in the CEQA Guidelines, including but not limited to expert opinion evidence supported by facts, to support its contention that such mitigation is not financially feasible. The Applicant’s substantial evidence shall be independently reviewed by the City’s financial experts or outside consultant, the

cost of which shall be paid by the Applicant. If the City concurs with the Applicant's conclusion that mitigation options 1 and/or 2 are not financially feasible, the Applicant shall provide mitigation at less than a 1:1 ratio, to the extent feasible, to minimize or reduce the level of impacts to Prime Farmlands and important Farmlands.

~~The City of Santa Paula does not propose to require implementation of agricultural mitigation for projects within the Santa Paula West Business Park Area. This determination is made based on the following reasons:~~

- ~~1. The City of Santa Paula recognized the loss of this agricultural land with the designation of the site for development in the General Plan. The Project Site is identified in the General Plan as a part of the West Area 2 Expansion Area. The City's General Plan Land Use Element currently designates the Project Site for Mixed-Use Commercial/Light Industrial uses.~~

~~The preservation of other existing agricultural land through purchase of conservation easements does not mitigate the loss of the land in question. The only way to mitigate the loss would be to preserve the land in question by preventing development.~~

~~The City has neither an established program under which agricultural mitigation fees could be collected and dispersed nor any policy to require such a program.~~

~~The cost of such agricultural mitigation is not considered economically feasible. This impact has been found to be significant and unavoidable, and a statement of overriding considerations will be adopted for approval of the Project.~~

Section 4.3, Air Quality

Page

Revision:

4.3-5

Existing Conditions, Air Pollutants, Table 4.3-2

Source: USEPA, "Region 9: Air Programs, Air Quality Maps," (December 2015), <https://www.arb.ca.gov/desig/adm/adm.htm>~~https://www3.epa.gov/region9/air/maps/~~.

Existing Conditions, Air Pollutants, Table 4.3-3

Source: California Air Resources Board, "Area Designations Maps/State and National" (December 2015),

<https://www.arb.ca.gov/desig/adm/adm.htm><https://www3.epa.gov/region9/air/maps/>

4.3-6

Air Pollutants

Ambient air quality is determined by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The South Central Coast Air Basin (“Basin”) has low mixing heights and light winds, which help to accumulate air pollutants. The average daily emissions inventory for the entire Basin and the Ventura County portion of the Basin is summarized in **Table 4.3-4, Regional Average Emissions in 2012-2015**. As shown, exhaust emissions from mobile sources generate the majority of ROGs, oxides and nitrogen (NOx), and CO in Ventura County. Area-wide sources generate the most airborne particulates (i.e., PM10 and PM2.5).

Air Pollutants, Table 4.3-4

**Table 4.3-4
Regional Average Emissions in 2012-2015**

Emissions Source	Emissions in Tons per Day					
	ROG	CO	NOx	SOx	PM10	PM2.5
Ventura County						
Stationary Sources	<u>6.8</u> <u>11.9</u>	<u>3.4</u> <u>9.6</u>	<u>2.1</u> <u>4.7</u>	<u>0.2</u> <u>6</u>	<u>0.6</u> <u>1.3</u>	<u>0.4</u> <u>1.0</u>
Area-wide Sources	<u>10.9</u> <u>13.4</u>	<u>14.4</u> <u>23.1</u>	<u>1.4</u> <u>7</u>	<u>0.1</u>	<u>13.4</u> <u>23.3</u>	<u>3.8</u> <u>5.6</u>
Mobile Sources	<u>15.4</u> <u>19.7</u>	<u>124.0</u> <u>136.8</u>	<u>26.3</u> <u>33.6</u>	<u>0.3</u> <u>16.1</u>	<u>2.2</u> <u>4.5</u>	<u>1.5</u> <u>3.9</u>
Natural Sources	<u>40.4</u>	<u>150.6</u>	<u>2.3</u>	<u>1.2</u>	<u>15.2</u>	<u>12.9</u>
Total Emissions	<u>73.5</u><u>45.0</u>	<u>292.4</u><u>169.5</u>	<u>32.2</u><u>60.0</u>	<u>1.8</u><u>16.7</u>	<u>31.3</u><u>29.1</u>	<u>18.5</u><u>10.5</u>
South Central Coast Air Basin						
Stationary Sources	<u>19.2</u> <u>11.7</u>	<u>12.0</u> <u>8.7</u>	<u>8.4</u> <u>3.7</u>	<u>1.5</u> <u>0.5</u>	<u>2.0</u> <u>1.3</u>	<u>1.1</u> <u>0.9</u>
Area-wide Sources	<u>26.9</u> <u>13.4</u>	<u>31.8</u> <u>23.1</u>	<u>3.1</u> <u>1.7</u>	<u>0.1</u>	<u>36.9</u> <u>23.3</u>	<u>9.0</u> <u>5.6</u>
Mobile Sources	<u>31.1</u> <u>18.5</u>	<u>285.0</u> <u>133.9</u>	<u>59.1</u> <u>26.6</u>	<u>0.5</u> <u>7</u>	<u>4.4</u> <u>2.1</u>	<u>2.9</u> <u>1.7</u>
Total Emissions	<u>77.1</u><u>43.6</u>	<u>328.8</u><u>165.8</u>	<u>70.6</u><u>32.0</u>	<u>2.2</u><u>1.3</u>	<u>43.3</u><u>26.7</u>	<u>13.0</u><u>8.2</u>

Source: California Air Resources Board, Published 2013, www.arb.ca.gov/app/emsinv/emseic1_query.php.

Notes: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gas; SOX = sulfur oxide.

4.3-7 Existing Local Air Quality

The Ventura County Air Pollution Control District (VCAPCD) monitors ambient air pollutant concentrations through a series of monitoring stations located throughout the County. These stations are located in Thousand Oaks, El Rio, ~~San Buenaventura (two stations)~~, Piru, Ojai, Simi Valley (two stations), and ~~on Anacapa Island-Thousand Oaks~~. In addition, the CARB operated a monitoring station in western Ventura County. The City of Santa Paula is located between El Rio and Piru monitoring stations. The El Rio station measures ambient concentrations of O₃, PM₁₀, PM_{2.5}, and NO₂. Ambient concentrations of ozone and PM_{2.5} are measured at the Piru station.

Table 4.3-5, Local Ambient Air Quality—El Rio and Piru Monitoring Stations, identifies the national and state ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at the El Rio and Piru monitoring stations during the period ~~2012-2014~~ through ~~2014-2016~~, which the most recent data available from CARB.

4.3-8 Existing Local Air Quality, Table 4.3-5

**Table 4.3-5
Local Ambient Air Quality—El Rio and Piru Monitoring Stations**

Pollutant	Standards	Year		
		2014 2	2015 3	2016 4
<i>El Rio-Rio Mesa School #2 Monitoring Station</i>				
Ozone (O₃)				
Maximum 1-hour concentration monitored (ppm)		0.1120 82	0.0700 67	0.0841 12
Maximum 8-hour concentration monitored (ppm)		0.077 65	0.066 3	0.071 7
Number of days exceeding state 1-hour standard	0.09 ppm	0	0	1
Number of days exceeding state 8-hour standard	0.070 ppm	<u>2</u> 0	0	<u>1</u> 2
Number of days exceeding federal 8-hour standard	0.070 5 ppm	<u>2</u> 0	0	1
Nitrogen Dioxide (NO₂)				
Maximum 1-hour concentration monitored (ppb)		<u>39</u> 57.0	<u>36</u> 40.0	<u>33</u> 39.0
Annual average concentration monitored (ppb)		<u>6</u> 7	<u>6</u> 7	<u>5</u> 6
Number of days exceeding state 1-hour standard	0.18 ppm	0	0	0
Respirable Particulate Matter (PM₁₀)				
Maximum 24-hour concentration monitored (µg/m ³)		<u>115</u> .356.9	<u>92</u> .046.7	<u>101</u> .651.3
Annual average concentration monitored (µg/m ³)		<u>27</u> .421.0	<u>25</u> .624.3	*
Number of samples exceeding state standard	50 µg/m ³	<u>0</u> 7	<u>0</u> 6	<u>1</u> 4
Number of samples exceeding federal standard	150 µg/m ³	0	0	0
Fine Particulate Matter (PM_{2.5})				

Pollutant	Standards	Year		
		2014 2	2015 3	2016 4
Maximum 24-hour concentration monitored ($\mu\text{g}/\text{m}^3$)		30.8 <u>22.2</u>	22.2 <u>25.5</u>	22.2 <u>22.7</u>
Annual average concentration monitored ($\mu\text{g}/\text{m}^3$)		8.7 <u>9.3</u>	9.6 <u>9.6</u>	9.3 <u>8.1</u>
Number of samples exceeding federal standard	35 $\mu\text{g}/\text{m}^3$	0	0	0
Number of samples exceeding state standard	12 $\mu\text{g}/\text{m}^3$	0	0	0
Piru Monitoring Station				
Ozone (O3)				
Maximum 1-hour concentration monitored (ppm)		0.082 <u>0.097</u>	0.067 <u>0.085</u>	0.112 <u>0.107</u>
Maximum 8-hour concentration monitored (ppm)		0.082	0.074	0.085
Number of days exceeding state 1-hour standard	0.09 ppm	1 <u>0</u>	0	1
Number of days exceeding state 8-hour standard	0.070 ppm	9 <u>14</u>	4 <u>3</u>	5 <u>9</u>
Number of days exceeding federal 8-hour standard	0.075 ppm	9 <u>1</u>	4 <u>2</u>	4 <u>5</u>
Fine Particulate Matter (PM2.5)				
Maximum 24-hour concentration monitored ($\mu\text{g}/\text{m}^3$)		23.8	24.7 <u>23.6</u>	26.7 <u>23.8</u>
Annual average concentration monitored ($\mu\text{g}/\text{m}^3$)		9.5 <u>9.5</u>	7.7 <u>7.5</u>	8.3 <u>9.6</u>
Number of samples exceeding federal standard	35 $\mu\text{g}/\text{m}^3$	0	0	0
Number of samples exceeding state standard	12 $\mu\text{g}/\text{m}^3$	0 <u>0</u>	0 <u>0</u>	0 <u>0</u>

Source: California Air Resources Board, Air Quality & Emissions, <http://www.arb.ca.gov/adam/topfour/topfour1.php>

Notes: $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter of air; ppm = parts per million by volume of air.

El Rio station measures ambient concentrations of O3, PM10, PM2.5, and NOx. Piru station measures ambient concentrations of O3 and PM2.5.

*Insufficient data available to determine the value.

4.3-12-13

Air Quality Management Plan

The VCAPCD is the agency principally responsible for comprehensive air pollution control in the Basin. As a regional agency, the VCAPCD works directly with SCAG, County transportation commissions, and local governments and cooperates actively with all federal and State government agencies. The VCAPCD develops rules and regulations to reduce emissions, protect public health and agriculture, and achieve and maintain State and federal air quality standards. In addition, the VCAPCD establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines when necessary.

The VCAPCD is directly responsible for reducing emissions from stationary, area, and mobile sources. It has responded to this requirement by preparing a sequence of AQMPs. The most recent of these was the 2016 Ventura County Air Quality Management Plan ("2016 AQMP") adopted by the Governing Board of

the VCAPCD in February 2017.³ The 2016 AQMP is based on growth projections for Ventura County and subareas within the County that have been agreed to by both the County and the SCAG. As such, the 2016 AQMP presents Ventura County's (1) strategy to attain the 2008 federal 8-hour ozone standard; (2) attainment demonstration for the federal 8-hour ozone standard; and (3) reasonable further progress demonstration for the federal 8-hour ozone standard.

~~The VCAPCD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of the VCAPCD in 2008. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high pollutant levels of pollutants in the Basin, to meet federal and state air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. It identifies the control measures that will be implemented to reduce major sources of pollutants. These planning efforts have substantially decreased the population's exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the County.~~

~~The future air quality levels projected in the 2007 AQMP are based on several assumptions. For example, the VCAPCD assumes that general new development within the County will occur in accordance with population growth and transportation projections identified by County staff.~~

4.3-19

Project Impacts

According to the VCAPCD Guidelines, to be consistent with the AQMP, a project must conform to the local general plan and must no result in or contribute to an exceedance of the County's projected population growth forecast.

~~The 2007 AQMP, discussed previously, was prepared to reduce the high levels of pollutants within Ventura County, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP~~

3 Ventura County Air Pollution Control District, *Final 2016 Ventura County Air Quality Management Plan* (adopted February 14, 2017), <http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/Final-2016-Ventura-County-AQMP.pdf>.

would not interfere with attainment because there were included in the projections utilized in the formulation of the AQMP.

~~According to the VCAPCD Guidelines, to be consistent with the AQMP, a project must conform to the local general plan and must not result in or contribute to an exceedance of the City's projected population growth forecast. The proposed Project does not include any new residential uses and would not result in the direct growth of population within the Santa Paula Growth Area.~~

The VCAPCD's AQMP considers regional population forecasts developed by the Southern California Association of Governments (SCAG). SCAG's most recent population forecast was adopted in 2016 as part of the *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*. The 2016 SCAG growth forecast projects a SCAG's population projection increase from 29,800 in 2012 to 38,800 by year 2040, and employment increase 7,800 jobs in 2012 to 11,700 jobs by the year 2040.⁴ The proposed Project will not increase the amount of housing within the Specific Plan area because no residences are planned to be built. The project employment increase would be approximately 1,510 employees⁵ or approximately 12.9 percent of SCAG's projected employment growth by the year 2040 of 11,700 employees. For analysis purposes, the Project would indirectly increase the local population if all 1,510 employees relocated to the City of Santa Paula; however, they would account for 17 percent of the projected growth in population. This is a conservative estimate as employees may already live in the area, or may reside in other cities. Given that employment opportunities within the City are supposed to steadily increase through the year 2040, the Project's addition of 1,510 employees would be consistent with the projections per SCAG.

The planned uses would also be consistent with the City's land use and zoning designation of the Project site. The Project would accommodate a mix of commercial and light industrial uses within walking distance which would reduce the need for residents within the City to travel long distances to other commercial and entertainment centers. As such, the Project would not conflict with the 2016 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in Ventura County. Therefore, impacts regarding consistency with applicable air quality are considered less than significant.

4 Southern California Association of Governments, *2012–2035 Regional Transportation Plan/Sustainable Communities Strategy*, April 2016.

5 US Green Building Council, *Building Area Per Employee by Business Type*, May 13, 2008, <http://www.usgbc.org/Docs/Archive/General/Docs4111.pdf>, accessed August 24, 2016.

nd would not result in SCAG projections being exceeded. Therefore, as growth under the Specific Plan is not expected, the Project would not conflict with the 2007 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in Ventura County. Therefore, impacts regarding consistency with applicable air quality are considered less than significant.

4.3-21 Project Impacts, Table 4.3-6, Construction Emissions

Year 2020						
Unmitigated Maximum	235.18	17.01	18.61	0.64	1.55	1.04
VCAPCD threshold	25	25	—	—	—	—
Threshold Exceeded?	Yes	No	—	—	—	—
Mitigated Maximum	234.09	12.66	21.16	0.03	1.31	0.86
Threshold Exceeded?	Yes	No	—	—	—	—

Source: Refer to Air Quality and Greenhouse Gas Modeling data sheets in **Appendix 4.3**.

Notes: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gas; SOX = sulfur oxide.

As shown in **Table 4.3-6**, construction activities associated with the construction of uses allowed with the Specific Plan would exceed VCAPCD threshold for ROG and NOx throughout the entire construction period. Emissions of ROG are a precursor for the formation of O3. The primary source of ROG emissions is off-gas emissions associated with architectural coating operations. The primary source of NOx, CO, and SOx emissions is from construction equipment exhaust and on-road haul truck trips while the majority of particulate matter emissions would occur as a result of fugitive dust emissions generated during grading and excavation activities. Primary sources of PM10 and PM2.5 emissions would be clearing activities, excavation and grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed earth surfaces.

Since construction of the Project will exceed the thresholds for ROG and NOx, these impacts are considered potentially significant.

Worst Case Construction Emission

The construction emissions analysis was conducted for Year 2020, which was identified as the worst-case year due to the overlapping construction activities of paving and architectural coating. Results of the construction emissions modeling analysis are presented in **Table 4.3-7, Worst-Case Construction Emissions (2020)**. ROG emissions from architectural coating exceeded the significance threshold.

4.3-22 Project Impacts, Worst Case Scenario

As discussed above, the VCAPCD's 25 lb/day threshold for ROG and NOx does not apply to construction emissions because such emissions are temporary. Emissions of TACs are localized, not regional, in nature; impacts related to construction activities would be limited to the area immediately surrounding the construction site within the Project area, and the VCAPCD does not recommend any thresholds of significance for their associated emissions. Instead, the VCAPCD bases the determination of significance on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended by the VCAPCD Guidelines are implemented for a project, then construction emissions are not considered significant. Implementation of mitigation measure AQ-1 through AQ-5 include dust control measures, such as watering graded areas, covering trucks hauling excavated soil, soil stabilization methods, and street sweeping; and construction equipment controls such as minimizing idle time, maintaining equipment engines, using alternatively fueled equipment, and minimizing the number of pieces of equipment operated simultaneously. All construction activities would adhere to the VCAPCD Rule 50 for Opacity, Rule 51 for Nuisance, and Rule 55 for Fugitive Dust. As such, construction related impacts would not be considered significant.

4.3-23 Project Impacts, Table 4.3-8, Operational Emissions

**Table 4.3-8
Operational Emissions**

Source	Pollutant (pounds/day)					
	ROG	NOx	CO	SOx	PM10	PM2.5
Maximum <u>mitigated</u>	29.71	22.93	103.64	0.41	29.44	8.33
VCAPCD threshold	25	25	—	—	—	—
Threshold exceeded?	Yes	No	—	—	—	—

Source: Refer to Air Quality and Greenhouse Gas Modeling data sheets in **Appendix 4.3**.

Notes: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gas; SOx = sulfur oxide.

4.3-25 Project Impacts

An HRA was prepared to determine whether diesel particulate emissions from construction ~~under~~ within the Santa Paula West Specific Plan will cause significant impacts to nearby sensitive receptors. PM10 exhaust serves as a surrogate for diesel particulate emissions from off-road construction equipment. Emission estimates and associated construction year were generated from the CalEEMod output data files (provided in **Appendix 4.3**) for the mitigated exhaust PM10 pollutant category. **Table 4.3-9, PM10 Exhaust Emissions by Calendar Year**, lists the maximum daily PM10 exhaust emissions for each calendar year of construction.

4.3-26 Project Impacts

The carcinogenic risk estimate was predicted to be 8.7×10^{-7} (0.86 in 1 million) at the MEIR location. In comparison to the applicable 10 in 1 million threshold level referenced above, carcinogenic risks do not exceed the level posing no significant risk. Therefore, impacts are less than significant.

4.3-28 Project Impacts

The uses allowed within Specific Plan area are not anticipated to use hazardous or acutely hazardous materials in appreciable quantities. Any quantifiable stationary source health risks will generally occur within facility boundaries. TACs typically exist at industrial operations or commercial facilities, such as gasoline stations or dry cleaners. However, the airborne release of such TAC emissions from such facilities would be sufficiently small enough. Hazardous substances are regulated under the California Accidental Release Prevention (CalARP) Program. The CalARP Program satisfies the requirements of the Federal Risk Management Plan Program, and contains additional state requirements. The CalARP Program applies to regulated substances in excess of specific quantity thresholds. The majority of the substances have thresholds in the range of 100 to 10,000 pounds. Moreover, significant amounts of hazardous substances will typically be expected at industrial, manufacturing, and complex water or wastewater treatment plant land uses. The uses allowed by the Santa Paula West Business Park Specific Plan do not include any operations that require ~~large~~ large amounts of hazardous materials that could pose a significant health risk. Accordingly, the Project will not result in

a significant impact with respect to use of hazardous materials during long-term operations.

4.3-28

Project Impacts

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. ~~Commercial and light industrial uses are not typically associated with objectionable odor complaints.~~ Some restaurants may generate odors that nearby residents consider objectionable, but this is largely dependent upon the cooking products that are used, the design of the restaurant ventilation and filtration system, and the sensitivity of the nearby residents. The restaurant kitchen design characteristics are evaluated at the time that the operator of the restaurant is requesting approval of permits from the VCAPCD. The types of industrial activities that would occur with the Project are not known at this time, but would be evaluated at the time that permits to construct and operate are applied for from the APCD. Therefore, the potential impacts associated with objectionable odors will be less than significant.

4.3-30

Mitigation Measures, Construction Emissions

AQ-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust-preventative measures using the following procedures, as specified by the VCAPCD (including without limitation, to VCAPCD Rule 50 (Opacity) and Rule 51 (Nuisance):

On-site vehicle speed shall not to exceed 15 miles per hour (the Project Site will contain posted signs with the speed limit).

All on-site construction roads with vehicle traffic shall be watered as necessary to prevent excessive dust;

Streets adjacent to the Project reach shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust.

All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day.

All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (i.e., greater than 25 miles per hour averaged over one hour) so as to prevent excessive amounts of dust (contact the VCAPCD meteorologist for current information about average wind speeds).

All material transported off site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.

The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.

These control techniques shall be indicated on Project grading plans. The Applicant and/or its contractor shall be responsible for implementing these measures and compliance with this measure will be subject to periodic site inspections by the City.

4.3-31

Mitigation Measures, Operational Emissions

~~The Specific Plan would result in significant and unavoidable impacts with regard to ROG. VCAPCD recommends that feasible area source mitigation measures be included in all projects that have been determined to have a significant air quality impact. Consequently, the following measures shall be incorporated or imposed upon the Project.~~

AQ-6: Use low emission water heaters for ~~residential, retail, and~~ commercial water heating (Emissions reduction of 11 percent for ROG and 9.5 percent for NOx).

AQ-7: Construct pedestrian and transit friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, and bikeways and/or lanes and bike racks. Sidewalks and bikeways should be landscaped with trees (an approximately 4 percent emissions reduction).

4.3-32 Mobile Source Emissions

AQ-8: Provide shuttle/minibus service between the Project commercial and industrial land uses ~~and the Project retail land uses~~ and the Santa Paula downtown area during the lunchtime period (11:00 AM to 2:00 PM).

4.3-33 Long-Term Operations

AQ-13: The Applicant and/or its contractor shall prepare a TDM for review and approval by the City and VCAPCD, before the City issues building permits. The plan shall incorporate reasonable and feasible measures to reduce Project-related traffic and vehicle miles traveled. At minimum, the TDM Program shall include the following measures:

Provision of connections to identified adjacent City or regional trails.

Provision of adequate way-finding features to direct pedestrians and bicyclists to nearby Project and City destinations, such as school, retail, and civic facilities.

~~Provision of homeowner information packets prior to close of escrow, identifying local and regional nonvehicular transportation options, and providing homeowners with basic information regarding telecommuting options.~~

Provision of adequate setbacks and design features such that the proposed future enhancement of commuter rail opportunities is not hindered by Project design.

Construction of pedestrian- and transit-friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, bikeways, or lanes. Sidewalks and bikeways should be landscaped with trees.

Perform a traffic light synchronization study on streets impacted by Project development to reduce vehicle queuing time.

The Project shall offset the increase in daily emission over the 25 pounds of reactive organic compounds and nitrogen oxides per day either through the purchase of emission offsets or through the in-lieu fees shall be paid to fund off-site TDM facilities or services, if such a program has been established at that time. These fees can reduce emissions from non-Project-generated motor vehicle trips by funding programs to promote ridesharing, public transit, and bicycling. The amount of this financial contribution should be calculated on a pro-rate basis as determined to be equitable by the VCAPCD, and in accordance with the VCAPCD Guidelines. These fees should be paid prior to the issuance of building permits by the County. The applicant shall demonstrate the availability of the offsets or contribution to fund off-site TDM services to the VCAPCD through a contract or other agreement with the offset source(s), which binds the reduction to the Project.

~~AQ 14: The Applicant and/or its contractor shall install EPA certified wood-burning stoves or fireplace inserts. If this is not feasible, then the installation of a ceramic coating on the honeycomb inside a catalytic combustor must be utilized or the use of natural gas fireplaces may be used as a feasible alternative.~~

Section 4.4, Biological Resources

Page

Revision:

4.4-4

Field Surveys

On May 20, 2015, BRC conducted a reconnaissance-level survey of the Project Site and surroundings. The area was methodically surveyed to document the existing conditions, wildlife and plant species present, and plant communities. It is not usually not possible to schedule all needed field surveys during the optimum survey period for all the special-status plant and wildlife species known to occur in the region. Therefore, the objective of the field survey was to determine the likelihood of occurrence of any special-status plant or wildlife species based on the presence/absence of suitable habitat and other natural history elements that might predict their occurrence.

4.4-22 American Badger (*Taxidea taxus*)—Listing: CA Species of Special Concern

This species was not observed during the Project surveys; however, the avocado orchard and the ecotone between the agricultural fields and Adams Barranca provides forging habitat for this species.

4.4-35 Project Impacts

As discussed previously in Existing Conditions, Southern California black walnut (*Juglans californica*) is the only special-status plant species that was documented or determined to have a high likelihood of occurring within the Project Site. A total of 19 individual trees are located along the perimeter of the Project Site, mainly along the southwest boundary within the riparian habitat of the Adams Barranca and along the SR 126 right-of-way along the southeast boundary of the Project Site, however, the Project does not currently propose to remove any of the 19 Southern California black walnut trees.

4.4-37 Project Impacts

Development under the Specific Plan would include removal of existing vegetation within the Project Site; grading to reach finished grades to support structures; installation of storm drains to carry surface runoff; and construction of buildings, driveways, and parking lots. This would require the removal of the agricultural drainage ditch that bisects the Project Site and is considered State Waters pursuant to the Fish and Game Code and the Clean Water Act. Other state and federal jurisdictional waters (i.e., those within Adams Barranca) would be preserved through an Open Space dedication and ~~prevention~~ the prohibition of construction activities within the Barranca. **Table 4.4-8, Impacts to Jurisdictional Waters**, provides a breakdown of the acres and linear feet of impacts of the Project.

While all Project impacts to ACOE and CDFW jurisdictional areas are considered potentially significant, and they would be mitigated to a less than significant level through the conditions ~~identified~~ imposed pursuant to the Project's 404, 401, and 1602 permits/agreement as well as by mitigation measures identified by this EIR.

4.4-38 Project Impacts, Increases in Light and Glare

The development of the Project Site would increase the number of nighttime light and glare sources on the site. Light and glare can “spill over” into adjacent open space areas, increasing the level of light currently experienced there. Nighttime illumination is known to adversely affect some species of animals in natural areas. Nighttime light can disturb breeding and foraging behavior and can potentially alter foraging and breeding behavior of nocturnal birds, mammals, and invertebrates, which is considered a potentially significant impact. However, Section 4.6 of the Specific Plan for the proposed Project addresses lighting guidelines for the Project Site, including but not limited to, height of lighting, requirements for screened lighting, and submittal of a lighting plan to the police Chief or designee for approval prior to issuance of a building permit. Impacts from lighting and glare would be considered less than significant.

4.4-38 Project Impacts, Increase in Human Presence

The Open Space area designations of the Specific Plan, upland buffers from the riparian area and development under the Project, and the Project characteristics that would provide predominantly indoor daytime work areas would minimize any potential for increase human disturbance to the Adams Barranca. Therefore, indirect impacts from human encroachment would be less than significant.

4.4-42 Project Impacts, Final Recovery Plan for the Least Bell’s Vireo

The Project is consistent with the recovery plan for this species because the least Bell’s vireo habitat present on the site would not be impacted. ~~The Project would result in~~ All potentially significant impacts to the least Bell’s vireo would be mitigated by ~~However, mitigation~~ measures are included within this EIR, and the Project would include an Open Space dedication along the western boundary to avoid impacts to habitat for least Bell’s vireo individuals in the Santa Clara River Watershed.

4.4-42 Project Impacts, Final Recovery Plan for the Southwestern Willow Flycatcher

~~The Project is consistent with the recovery plan for this species because if southwestern willow flycatchers are located on site, they would not be permanently impacted. All~~ Although, the Project would result in potentially

~~significant~~ impacts to the southwestern willow flycatcher during construction would be mitigated by, mitigation measures are included with in this EIR, and the Project includes an Open Space dedication along the western boundary to avoid impacts to habitat for southwestern willow flycatcher individuals in the Santa Clara River Watershed. The southwestern willow flycatchers would not be permanently impacted, and therefore the Project is consistent with the recovery plan for.

4.4-43

Cumulative Impacts

The development of approximately 49 acres of already disturbed agricultural lands and 4.48 acres of urban developed land on the Project Site would have limited adverse effects on the diversity and abundance of native flora and fauna either locally or in the region. Natural habitat areas containing suitable habitat for special-status animal and plant species is proposed to be preserved. The impacted area of the Project Site supports only marginally suitable habitat for a few special-status animals, and has no potential to support a high diversity of native plants. Most wildlife species that could be expected to use the Project Site are species that are adapted to the disturbance that is caused by human-induced activities. Because of the present condition of the Project Site and the surrounding lands, it is unlikely that development of the site would contribute significantly to cumulative adverse impacts to regional flora and fauna. However, ~~the~~ the loss of habitat associated with development of the Project area would contribute to the overall cumulative loss of biological resources in the Santa Paula region. ~~However,~~ Given that the impacted habitat within the Project area consists primarily of agricultural and urban developed land, and the impacted waters are small (less than 1 acre), the incremental contribution of the Project to this habitat loss is not cumulatively considerable and, therefore, not significant.

4.4-43

Mitigation Measures, BR-1

Before issuance of a grading permit, the Applicant must identify on grading plans, the locations of any protected trees (such as the Southern California black walnut, *Juglans californica*) and must include a report pertaining to preserving the tree(s) that could be affected by the grading activity. The report shall be prepared by a tree expert and shall evaluate the ~~subdivider's~~ Applicant's proposals for protected tree preservation, including avoiding grading, land movement, or other

activity within the drip line of any protected tree. Prior to grading, the drip line must be fenced to prevent earthmoving equipment from inadvertently entering the drip line. In the event protected tree cannot be avoided, then the Applicant must provide a tree report in accordance with the City's Tree Protection Ordinance and must provide for the replacement or relocation of any protected trees that are to be removed, or would be subject to landmoving or grading within its drip line.

4.4-44

Mitigation Measures, BR-3

To avoid impacts to native nesting birds, the Applicant must retain a qualified biologist (with selection to be ~~reviewed~~ approved by the City) to conduct nest surveys in potential nesting habitat within the Project Site prior to construction or site preparation activities. Specifically, within 30 days of ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys to determine if active nests of bird species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Wildlife Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. Surveys for special-status bird species can be conducted concurrently with general nesting bird surveys. Because birds known to use the Project area nest during the late winter, breeding bird surveys shall be carried out both during the typical nesting/breeding season (mid-March through September) and in January and February. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than 3 days shall have elapsed between the last survey and the commencement of ground disturbance activities.

Surveys shall include examination of trees, shrubs, and the ground within grassland for nesting birds, as several bird species known to occur in the area and are shrub or ground nesters, including burrowing owl, California horned lark, and mourning dove. In addition, due to the potential for least Bell's vireo and southwest willow flycatcher to exist, protocol surveys should be completed prior to the start of construction.

4.4-45

Mitigation Measures, BR-6

To avoid potential impacts to the Pallid bat (*Antrozous pallidus*) and the Hoary Bat (*Lasiurus cinereus*), the Applicant must retain a qualified biologist (with selection to be reviewed by the City) to conduct roosting bat surveys within the Specific Plan area prior to site preparation activities. Thirty days before ground disturbance activities associated with construction or grading, a qualified biologist shall conduct weekly surveys in accordance with standard protocols to determine if roosting western red bats are present in the construction zone or within 300 feet of the construction zone. Roosting bat surveys shall be carried out from March through September. Surveys for special-status bat species may be conducted concurrently with nesting bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to initiation of clearance or construction work. If ground disturbance activities are delayed, then additional pre-construction surveys shall be conducted such that no more than three days shall have elapsed between the last survey and the commencement of ground disturbance activities. Surveys shall include examination of trees and large shrubs in which this species is known to roost. Any bats found outside of the breeding season (May through August) shall be relocated by having a qualified biologist remove the bat from the roost. If roosting female bats are found with young during the breeding season (May through August) clearing and construction activities within 300 feet of the roost, shall be postponed or halted until the roost is vacated and juveniles have been weaned, as determined by the biologist. Limits of construction to avoid an active roost site shall be established in the field with flagging, fencing, or other appropriate barriers. Construction personnel shall be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active roost areas to ensure that no inadvertent impacts on these roosts will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the City of Santa Paula within 30 days of completion of the pre-construction surveys and construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of these bat species.**4.4-46**

Mitigation Measures, BR-7

Before issuance of a grading permit for areas that require state permits, the applicant shall coordinate with the CDFW to verify the impact to state-protected waters and associated vegetation on the Project Site. A Streambed Alteration Agreement (SAA) must be obtained, and ~~mitigation measures~~ conditions of approval, including but not limited to buffer zones, recommended by the CDFW as part of the SAA shall be implemented. The SAA shall be provided to the City prior to issuance of a grading permit.

Section 4.5, Cultural Resources**4.5-21-22****Cumulative Impacts**

Potential impacts to cultural resources within the Project Site would be mitigated to less than significant with implementation of mitigation measures. Additionally, ~~P~~previous development within Ventura County has resulted in the loss of much of the evidence of the prehistoric occupation and use of the area. As discussed in **Section 3.0, Related Projects**, current development projects within the City of Santa Paula include a number of projects ranging from relatively small residential developments to larger residential development, commercial and industrial developments, and mixed-use developments. Other Specific Plan projects that would likely have similar potentially significant impacts to paleontological, archaeological, and historic resources include the remainder of West Area 2, Adams Canyon, Fagan Canyon, and ~~the recently approved~~ East Area 1 Specific Plan and East Area 2 Projects. The ~~Specific Plan Project,~~ in combination with other currently planned projects, ~~would~~ may result in the potential for a cumulatively significant contribution to significant cumulative impacts. ~~However,~~ ~~M~~mitigation measures would reduce the potentially significant cumulative contribution to paleontological, archaeological, and historical resources. Therefore, impacts are not considered cumulatively considerable and potentially significant.

4.5-22**Mitigation Measures, CUL-3**

In the event that previously unidentified archaeological resources are discovered during building construction, the contractor must cease work in the immediate area and the City Planning Director shall be contacted. An independent qualified archaeologist, retained by the City at the expense of the applicant, must assess

the significance of the find and make mitigation recommendations, which shall be implemented to the extent feasible.

Section 4.6, Geology and Soils

Page

Revision:

4.6-25

Project Impacts

Construction activities would comply with erosion control requirements, including existing grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, each construction project permitted under the Specific Plan would be required to comply with City's necessary permits, plans, plan checks, and inspections to reduce the effects of sedimentation and erosion. In addition, as discussed in **Section 4.9, Hydrology and Water Quality**, the Project would be required to have a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, best management practices (BMPs) would be implemented during construction to reduce soil erosion and pollutant levels to the maximum extent possible.

4.6-26

Cumulative Impacts

Geologic impacts are typically confined to a project site or within a localized area and do not affect off-site areas associated with the related projects identified in **Section 3.0, Related Projects**, or other growth in the City. At a minimum, all development occurring within the City of Santa Paula would be subject to CBC and construction standards relative to seismic and other geologic conditions that are prevalent within the region. Also, individual project geotechnical investigation reports, required prior to permit approval, would provide recommendations to account for site-specific design requirements to avoid subjecting on- and off-site properties to geologic hazards, in accordance with the CBC. With regard to erosion and sedimentation, development under the Santa Paula West Specific Plan and related projects are required to implement a SWPPP during construction, as required by the NPDES permit, to minimize impacts to off-site properties from the effects of erosion. Therefore, based on the Santa Paula West Specific Plan design (including recommendations within the geotechnical reports), and compliance with applicable regulations and plan review, the Project

will meet the applicable standards and will sufficiently reduce its incremental cumulative geology and soil impacts to a less than significant cumulative impact.

4.6-27

Mitigation Measures, G-1

Additional explorations must be performed at the tentative tract map and grading plan review stages of the development planning. The purpose of the explorations would be to establish required removal depths and delineate any portion of the Project Site deemed susceptible to seismically induced settlement. The Project shall comply with all CBC/UBC requirements for seismic safety.

Section 4.7, Greenhouse Gases

Page

Revision:

4.7-24

Cumulative Impacts

Climate change is a cumulative impact from various global sources of activities that incrementally contribute to global GHG concentrations. Individual projects provide a small addition to total concentrations but contribute cumulatively to a global phenomenon. The goal of AB 32 is to require GHG emission reductions from existing conditions. As a result, cumulative GHG and climate change impacts must be analyzed from the perspective of whether they would impede the state’s ability to meet its emission reduction goals.

To achieve Statewide goals, CARB is in the process of implementing regulations to reduce Statewide GHG emissions. However, currently, no applicable significance thresholds, specific reduction targets, and approved policies or guidance are in place to assist in determining significance at the project or cumulative level. Additionally, currently no generally accepted methodology exists to determine whether GHG emissions associated with a specific project represent new emissions or existing and/or displaced emissions.

GHG emissions reductions would be achieved through energy-efficient lighting and building design; installation of low-flow appliances; and water conservation. The methods used to establish this relative reduction are consistent with the approach used in the CARB’s Scoping Plan for the implementation of AB 32 through 2020. The Project’s features and GHG reduction measures make the

Project consistent with the goals of AB 32. Therefore, the Project will result in a less than significant contribution to cumulatively significant GHG emissions.

~~Although the Specific Plan is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. However, currently there are no significance thresholds, specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative level. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Implementing the project design features and GHG-reducing measures would result in a net decrease in GHG emissions. The Project’s design features and GHG reduction measures make the Specific Plan consistent with the goals of AB 32.~~

Section 4.8, Hazards and Hazardous Materials

Page

Revision:

4.8-16

Project Impacts

The Project proposes the development of a business park that would include commercial and light industrial uses with some areas for passive open space. Operation of the Project ~~would~~ may involve the use, transport, production, handling, or storage of hazardous materials that have the potential to create a significant hazard to people on the Project Site. These materials may include the use of fuels, grease, solvents, paints, and pesticides and other various landscaping products. The storage and disposal of these hazardous materials on the Project Site would comply with City and SPFD regulations and standards.

Furthermore, the Ventura County Transportation Commission (VCTC) owns the 100-foot-wide railroad corridor that bisects the Project. While the railroad has the capacity to serve as a corridor for the transport of hazardous materials, the railroad is currently out of service and would not pose any dangers to people on the Project Site related to the accidental release of hazardous materials, such as a fire, explosion, or chemical spill. However, if the railroad is commissioned for

service within the future, any transport of hazardous materials would comply with US Department of Transportation (USDOT) Federal Railroad Administration (FRA) safety regulations. Therefore, the probability of an accident involving the transport of hazardous materials within proximity to the Project Site is considered to be very low unlikely. Impacts would be less than significant.

4.8-18**Project Impacts**

As provided previously, the Project ~~would~~ may involve the use of hazardous materials onsite typical of industrial-type uses. The storage and disposal of these hazardous materials on the Project Site would comply with City and SPFD regulations and standards. Therefore, impacts would be less than significant.

4.8-21**Project Impacts**

The City requires preparation of a detailed Construction Traffic Management Plan, which would be submitted to the City for review and approvals consistent with the City's existing standards and emergency response plans. The plan would provide notification to the City of Santa Paula Police Department (SPPD), which oversees emergency operations within the City in cooperation with the Ventura County OES.⁶ The OES is coordinated through the Ventura County Sherriff's Department and is responsible for countywide disaster planning, mitigation, response, and recovery activities through the implementation of the Ventura County Hazard Mitigation Plan. The City's designated evacuation routes are along SR 126 and SR 150. While, SR 126 runs along the southern boundary of the Project Site, construction activities of the Project are not anticipated to interfere with access to the roadway or interfere with operation of the County's Hazard Mitigation Plan. Emergency access and potential traffic access impacts would be less than significant.

As with much of southern California, the Specific Plan area has the potential for ~~residents and~~ employees to encounter human-made and natural hazards, which could cause undue hardship to ~~residents and~~ employees. Human-made hazards include the potential release of hazardous materials; the potential for biological or chemical attacks from foreign and domestic terrorism; and the potential for

6 City of Santa Paula, *General Plan*, "Safety Element," (1998).

fires started by humans. Natural hazards include flooding, seismic activity, extreme weather conditions, and fires that are started naturally.

4.8-21**Project Impacts**

The Specific Plan is not located ~~not~~ within a CAL FIRE designated LRA or SRA. The nearest FHZA within the SRA is located just south of the Specific Plan area. The foothills to the south of the Specific Plan area are designated Moderate Severity, while areas further up the South Mountains carry a Very High Severity classification. Based on the City of Santa Paula General Plan, the Project Site is located within an area with minimal fire hazard risk. As the Project involves the development of commercial and light industrial uses across the site's estimated 54 acres. Thus, there would be minimal vegetation that could pose a flammable hazard.

4.8-22**Cumulative Impacts**

Related projects may be located on or near a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. Development of any of the related projects would be required to comply with existing applicable laws and regulations pertaining to hazardous wastes, and the risk with identified hazardous material sites would be eliminated or reduced through proper handling, disposal practice, and/or clean up procedures. Accordingly, cumulative impacts to the public or environment associated with development on or near listed contaminated sites would be less than significant.

4.8-23-4.8-24**Mitigation Measures, HM-5**

In the unlikely event that hazardous materials are encountered during grading or excavation activities anywhere on the Project Site, earthwork must be temporarily suspended in order to coordinate investigation/remediation efforts with the oversight of the Santa Paula Fire Department. An environmental professional (e.g. a professional geologist) is recommended to provide oversight and project monitoring to ensure the health and safety of all workers. A remedial plan consistent with federal and state remedial requirements, must be developed by a professional geologist approved by the City and submitted to the City Planning Director, or designee, for approval as required before continued work in the area.

Section 4.9, Hydrology and Water Quality

Page

Revision:

4.9-4

Watershed Description

As shown in **Table 4.9-3**, a small portion of the Santa Paula West Business Park existing property drains west into Adams Barranca. Adams Barranca is a raised channel; on average, the top of the channel is 2 feet higher than the adjacent grade on the property. This portion of the property is subject to flooding during a 100-year storm event from Adams Barranca.⁷ The SR 126 westerly culverts (Area B) ~~handle~~ currently accept the flow from approximately 27 acres. Overflow from pipe inlet blockage travels easterly to two other culverts under SR 126 or farther east to the inlet at the end of Faulkner Road into a 72-inch reinforced concrete pipe (RCP) leading to Todd Lane Drain. The SR 126 easterly culverts (Areas C and D) handle flows from approximately 31 acres. Overflow from pipe inlet blockage travels easterly to the inlet at the end of Faulkner Road into a 72-inch RCP leading to Todd Lane Drain.

4.9-16

Project Impacts

Development of the Specific Plan would involve construction activities over an estimated ~~2-5~~10-year period. Proposed grading and construction activities would involve earth movement and the use of heavy equipment. Peak stormwater runoff could result in short-term sheet erosion with areas of exposed or stockpiled soils. Additionally, the compaction of soils by heavy equipment may reduce the infiltration capacity of soils and increase runoff and erosion potential. Given the above, pollutants such as soil, sediments, and other substances associated with construction activities (e.g. oil, gasoline, grease, and surface litter) could be present in stormwater runoff from the site.

4.9-18

Project impacts

Overall, the BMPs and the project design features would address the anticipated and expected pollutants of concern from operation of the Project. Degradation of water quality from the Project would be managed in accordance with all

⁷ FEMA Flood Map Service Center (Map Numbers 0611C0778E and 0611C0779E), <https://msc.fema.gov/portal/search?AddressQuery=Faulkner%20Road%2C%20Santa%20Paula>.

existing applicable federal, state, and local water quality rules and regulations to effectively minimize the Project's impact on water quality. Accordingly, impacts would be less than significant.

4.9-18**Project Impacts**

Based on the above, the Project will not result in a significant new demand for water and will not substantially deplete groundwater supplies. In addition, the Project would use less water than the existing agricultural operations, and the Specific Plan would incorporate design features such as bioswales, bioretention cells, infiltration trenches and permeable pavement to allow surface water runoff percolation. Therefore, the Specific Plan would not substantially interfere with groundwater recharge. There will be no substantial impact to local groundwater recharge. Therefore, impacts would be less than significant.

4.9-19**Project Impacts**

The Project does not alter the course of a stream or river, however ~~S~~ site-clearing and grading operations have the ~~greatest~~ potential for discharging sediment downstream during storm events. As discussed above, construction and grading activities would involve earth movement and the use of heavy equipment. Peak stormwater runoff could result in short-term sheet erosion with areas of exposed or stockpiled soils. Additionally, the compaction of soils by heavy equipment may reduce the infiltration capacity of soils and increase runoff and erosion potential.

4.9-20**Project Impacts**

As mentioned previously, the Specific Plan would not substantially alter drainage patterns within the Project area. The Specific Plan would provide future development in accordance with proposed land use designations for the Specific Plan area, nor alter a stream or river. Given that the Specific Plan area consists of undeveloped agricultural land, development would result in an increase in the rate and amount of surface runoff generated by the Specific Plan Area.

4.9-20**Cumulative Impacts**

The cumulative impact analysis in this Section considers related development projects in the area. With regard to water quality, the related projects would be

required to comply with the NPDES General Construction Permit, including implementation of a site-specific SWPPP, to prevent polluted runoff from entering local stormwater drainage systems during construction activities. Additionally, each related project would be subject to NPDES requirements and applicable SPMC requirements. The Project would not contribute to a cumulatively significant hydrology or water quality impact. First, the Project does not alter any streams or rivers. Second, ~~Given that~~ each related project would be required to comply with NPDES requirements and local regulations designed to prevent polluted runoff from entering local storm drain systems and receiving water bodies during construction and after development, the cumulative impact to water quality would be less than significant. Furthermore, in compliance with NPDES, the cumulative impact related to erosion and siltation would also be less than significant.

Section 4.10, Land Use

Page

Revision:

4.10-22-4.10-27

LAFCo Commissioners Handbook Standards

The Project is consistent with the Handbook policies that favor annexations to cities, as set forth in Section 3.3.1 General Standards for Annexation to Cities and Districts, ~~because it would:~~

~~Eliminate islands of unincorporated territory and fill in gaps within the City of Santa Paula's jurisdictional boundaries. While the VCTC railway that bisects the Project Site is not a part of the Project, the areas along the railroad right-of-way would be improved with landscaped screening to ensure compatibility with the Project. Additionally, an existing at-grade crossing will be realigned approximately 100 feet to the east to align with Beckwith Road. Implementation of the Project around the VCTC railway would not result in any conflicts with surrounding City uses.~~

~~Facilitate urbanized development in the western portion to the City of Santa Paula, consistent with the City's existing General Plan policies that envision this area for urban expansion to accommodate City growth through 2020. Buildout of the Specific Plan area is imminent, based upon future market and economic conditions, with concurrent infrastructure improvements and extension of public services to maintain desired levels of service.~~

Extensions of municipal services are needed to support the range and intensities of land uses envisioned for this area by the City's General Plan, and the City of Santa Paula has the resources to provide such services in an efficient manner. The Project Site is located within the City's SOI and is proposed for expansion within the General Plan. The Proposed Project would benefit the community as it would be used for public purposes.

3.3.1.1 Factors Favorable to Approval:

a. The proposal would eliminate islands, corridors, or other distortion of existing boundaries.

The proposed Project would extend the existing City boundary and would not create any islands of unincorporated territory or distort the existing boundary of the City.

b. The affected territory is urban in character or urban development is imminent, requiring municipal or urban-type services.

The Project Site is located within the City's Sphere of Influence (SOI) and has been identified as an expansion area within the City's General Plan since 1998 to meet the need for additional light industrial and business park land in the City. Because the area is currently undeveloped, future development would require the extension of urban services.

c. The affected territory can be provided all urban services by the city or district as shown by the city's or district's service plans and the proposal would enhance the efficient provision of urban services.

Extensions of municipal services are needed to support the range and intensities of land uses envisioned for this area by the City's General Plan, and the City of Santa Paula will provide services.

The Santa Paula Water Master Plan, plans for the expansion of West Area 2, stating "The water demands of West Area 2 are not expected to be significant, and are not expected to affect the overall infrastructure requirements for the system. However, fire flow needs could be substantial, depending on the size and types of building that may be proposed for this commercial area. To supply the required fire flows, a pipeline that crosses the freeway will likely be needed of significant size (12 or 16-inch). When the plans for the development are available, and water and firefighting needs are better defined, a detailed water system analysis is recommended."⁸

⁸ Boyle Engineering Corporation, City of Santa Paula Potable Water System Master Plan (Final; October 2005), 127-128, <http://www.ci.santa-paula.ca.us/PubWorks/PotableWaterMasterPlanOct2005.pdf>.

The Santa Paula Wastewater Master Plan, also provides for wastewater service for West Area 2 to meet a projected wastewater average dry weather flow of 0.1088 million gallons per day (mgd).⁹

d. The proposal is consistent with state law, adopted spheres of influence, applicable general and specific plans, and these policies.

The Project Site is located within the City's SOI and is identified as an expansion area the City's General Plan. The proposed Project would be consistent with the City of Santa Paula General Plan and Municipal Code.

e. The proposal is for the annexation of city or district owned property, used or to be used for public purposes.

The Project does not include City- or district-owned property.

As shown, the proposed Project is consistent with factors (a) through (d), and factor (e) does not apply to the proposed Project.

⁹ Boyle Engineering Corporation, City of Santa Paula Wastewater System Master Plan (September 2005), Table 3-2, <http://ci.santa-paula.ca.us/PubWorks/WASTEWATERMASTERPLANSEPTEMBER2005.pdf>

3.3.1.2 Factors Unfavorable to Approval:

a. The proposal would create or result in corridors, peninsulas, or flags of city or district area or would otherwise cause or further the distortion of existing boundaries.

The proposed Project would extend existing City boundaries and would not create islands of unincorporated territory.

b. The proposal would result in a premature intrusion of urbanization into a predominantly agricultural or rural area.

The Project Site is located within the City's SOI and has been identified as an expansion area in the City's General Plan since 1998 to meet the need for light industrial and business park land in the City and, for this reason, annexation of the Project Site at this time would not result in the premature urbanization of a predominantly agricultural or rural area.

c. The proposal is inconsistent with state law, adopted spheres of influence, adopted general or specific plans, adopted habitat conservation and/or restoration plans, other applicable plans adopted by any governmental agency, or these policies.

The Project Site is located within the City's SOI and is identified as an expansion area the City's General Plan. The proposed Project would be consistent with the City of Santa Paula General Plan and Municipal Code. There are no habitat conservation plans or other applicable plans adopted by other governmental agencies the Project is inconsistent with.

d. For reasons of topography, distance, natural boundaries, or like considerations, the extension of services would be financially infeasible, or another means of supplying services by acceptable alternatives is preferable.

The proposed Project is adjacent to existing uses within the City that currently utilize services. Services can be extended cost effectively to the proposed Project Site from adjacent developed areas in the City of Santa Paula in accordance with the City's utility master plans in

e. Annexation would encourage a type of development in an area that due to terrain, isolation, or other economic or social reason, is not in the public interest.

The Project Site is relatively flat and borders developed portions of the City of Santa Paula to the east. The Project Site is located within the City's SOI and has been identified as an expansion area in the City's General Plan since 1998. Annexation of the site would be in the public interest.

f. The proposal appears to be motivated by inter-agency rivalry or other motives not in the public interest.

The Project would be consistent with the Guidelines for Orderly Development that provide for development to occur within the cities and not within the unincorporated County. The Project proposes to annex land that has been identified within the City's General Plan and SOI and is proposed for expansion within the General Plan.

g. The proposed boundaries do not include logical service areas or are otherwise improperly drawn.

The proposed Project would not create distorted boundaries and would extend existing boundaries as provided for in the SOI. Infrastructure improvements and extension of public services would be extended in an efficient manner.

h. The proposal area would accommodate new development and includes a tsunami inundation zone, wildfire hazard zone, FEMA designated floodway or floodplain, or other hazardous area designated by federal, state or local public agencies, unless the Commission determines that the hazard or hazards can be adequately mitigated.

The proposed Project would not be located in a tsunami inundation zone, wildfire hazard zone, or other hazardous area designated by federal, state or local public agencies. As indicated in the Draft EIR, the western portion of the Specific Plan site located adjacent to Adams Creek is currently located within a FEMA-designated 100-year floodplain area. However, a review of historic flooding, existing contours, and site features concludes the Flood Zone limit shown on the FIRM maps is inaccurate.

i. The proposal will result in an unacceptable significant adverse impact(s) to the environment as determined by the Commission.

Mitigation is identified in the Final EIR for all significant impacts identified for the Project including Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, Transportation and Traffic, and Utilities.

As shown, the proposed Project would not result in any conditions that would be unfavorable as outlined in the factors (a) through (i).

SECTION 3.3.2 GENERAL BOUNDARY CRITERIA

3.3.2.1 LAFCo Favors Applications with Boundaries that do the Following:

a. Create logical boundaries that coincide with existing and planned service areas and, where possible, eliminate previously existing islands.

The proposed Project would create logical municipal service boundaries within the City's established SOI. The Project Site is within an area where the City has planned for the provision of urban services.

b. Follow natural and man-made features, such as ridge lines drainage areas, watercourses, and edges of right-of-way, provided they coincide with lines of assessment or ownership, or are described by metes and bounds legal descriptions which can easily be used for mapping lines of assessment or ownership.

The Project extends to a natural boundary on the west, the Adams Barranca, and coincides with existing rights-of-way and parcel boundaries.

c. Include adjacent urbanized areas which are receiving or which may require urban services such as public water and/or sewer services.

The Project Site is currently undeveloped land within the City's SOI and is not adjacent to any existing unincorporated areas receiving or requiring urban services.

As shown, the proposed Project is consistent with factors (a) and (b), and factor (c) does not apply.

3.3.2.2 LAFCo Discourages Applications with Boundaries that:

a. Split neighborhoods or divide an existing identifiable community, commercial district, or other area having a social and economic identity.

The proposed Project would not split or divide any existing communities, commercial districts, or other areas having a social and economic identity.

b. Create areas where it is difficult to provide services.

The proposed Project would create logical municipal service boundaries within the City's established SOI.

c. Create boundaries which result in islands, peninsulas, flags, "pinpoint contiguity," "cherry stems," or cause, or further, the distortion of existing boundaries.

The proposed Project would extend existing City boundaries and would not create boundaries which result in islands, peninsulas, flags, "pinpoint contiguity," "cherry stems," or cause, or further, the distortion of existing boundaries.

d. Are drawn for the primary purpose of encompassing revenue-producing territories.

The Project would be consistent with the City's existing General Plan that identifies this area for urban expansion to accommodate City growth through 2020. The General Plan identifies this area for industrial and research and development uses.

As shown, the proposed Project would not result in any conditions that would be discouraged by LAFCo as outlined in factors (a) through (d).

SECTION 3.3.5 AGRICULTURE AND OPEN SPACE PRESERVATION

3.3.5.1 Findings and Criteria for Prime Agricultural and Existing Open Space Land Conversion

LAFCo will approve a proposal for a change of organization or reorganization which is likely to result in the conversion of prime agricultural or existing open space land use to other uses only if the Commission finds that the proposal will lead to planned, orderly, and efficient development. For the purposes of this policy, a proposal for a change of organization or reorganization leads to planned, orderly, and efficient development only if all of the following criteria are met:

a. The territory involved is contiguous to either lands developed with an urban use or lands which have received all discretionary approvals for urban development.

The Project Site is adjacent to urbanized land within the City of Santa Paula to the east. Additionally, to the north of the Project Site, beyond Telegraph Road, are additional areas containing urban uses.

b. The territory is likely to be developed within 5 years and has been pre-zoned for nonagricultural or open space use. In the case of very large developments, annexation should be phased wherever possible.

The Project Site has been designated in the City's General Plan as an expansion area since 1998. With approval of the proposed Project, the site will be pre-zoned for nonagricultural use.

c. Insufficient non-prime agricultural or vacant land exists within the existing boundaries of the agency that is planned and developable for the same general type of use.

The City completed an inventory of vacant land within the City limits for the City's 2013-2021 Housing Element Update. This inventory identified approximately 60 acres of vacant, residentially land, including several small vacant commercial properties, within the current city limits Those vacant sites are not contiguous and are dispersed throughout the City.

In addition to these 60 acres of vacant land, the City has adopted Specific Plans for the East Area 1 and East Gateway Specific Plan Areas on the eastern edge of the City. Each of these Specific Plans designates small areas for business park uses. The East Gateway Specific Plan area is, however, primarily planned for development with community level retail commercial uses.

The small amount of vacant land available inside the City limits and available for development with light industrial and business park uses is not sufficient to meet the objectives in the City's General Plan. The West Area Expansion Area is the primary area for additional light industrial uses identified in the City's General Plan. There is insufficient non-prime agricultural or vacant land within the City's existing boundaries that is planned and developable for the same general type of use. As the parcel of vacant land are dispersed and not contiguous, they do not provide sufficient site area to enable orderly, efficient and planned development of the commercial and light industrial uses envisioned for the Project area in the Santa Paula General Plan.

Other undeveloped land is available within the City's Sphere of Influence includes other expansion areas identified in the Santa Paula General Plan. They include Adams and Fagan Canyons located well north of SR 126 and have limited access. Because of the existing characteristics of these expansion areas, the Santa Paula General Plan limits development in Adams Canyon to single-family homes, a destination resort hotel, and a golf course, along with public facilities. Development permitted in Fagan Canyon by the General Plan includes single-family residences with supporting public facilities and a limited amount of neighborhood commercial uses. As such, these areas do not have the locational characteristics required for light industrial uses, or are not large enough to accommodate these uses.

d. The territory involved is not subject to voter approval for the extension of services or for changing general plan land use designations. Where such voter approval is required by local ordinance, such voter approval must be obtained prior to LAFCo action on any proposal unless exceptional circumstances are shown to exist.

The affected territory is not subject to voter approval for the extension of services or for the proposed minor changes in existing City General Plan land use designations. The proposed Specific Plan would include the annexation of land located within the City Urban Restriction Boundary (CURB). Measure L6 is not triggered by the proposed Project.

e. The proposal will have no significant adverse effects on the physical and economic integrity of other prime agricultural or existing open space lands.

The Project will be adjacent to other existing agricultural or open space lands for which the Project has been designed to address compatibility, including a buffer along the Adams Barranca to the west, and does not include uses such as residential, schools, and other sensitive receptors immediately adjacent to agricultural operations.

As shown, the proposed Project is consistent with factors (a) through (e).

3.3.5.2 Findings that Insufficient Non-Prime Agricultural or Vacant Land Exists

The Commission will not make affirmative findings that insufficient non-prime agricultural or vacant land exists within the boundaries of the agency unless the applicable jurisdiction has prepared a detailed alternative site analysis which at a minimum includes:

a. An evaluation of all vacant, non-prime agricultural lands within the boundaries of the jurisdiction that could be developed for the same or similar uses.

The proposed Project would develop approximately 54 acres of agricultural land. As discussed in **Section 4.10, Land Use**, of the Draft EIR, there is insufficient non-prime agricultural or vacant land within the City's existing boundaries that is planned and developable for the same general type of use.

The City conducted an inventory of vacant land conducted for the City's 2013–2021 Housing Element Update identified approximately 60 acres of vacant, properties within the current City limits, not including land in the City's East Area 1 and East Gateway Specific Plan areas. Those vacant sites are dispersed throughout the City, include sites zoned for residential uses, and do not provide sufficient contiguous land to allow for the orderly, efficient, and planned development of the commercial and light industrial uses envisioned for the Project area in the Santa Paula General Plan.

b. An evaluation of the re-use and redevelopment potential of developed areas within the boundaries of the jurisdiction for the same or similar uses.

The City completed an inventory of vacant land within the City limits for the City's 2013-2021 Housing Element Update. This inventory identified approximately 60 acres of vacant, residentially land, including several small vacant commercial properties, within the current city limits Those vacant sites are not contiguous, are dispersed throughout the City, and are not suitable for development with the type of light industrial and business park uses that would be accommodated by this proposed Project.

c. Determinations as to why vacant, non-prime agricultural lands and potential re-use and redevelopment sites are unavailable or undesirable for the same or similar uses, and why conversion of prime agricultural or existing open

space lands are necessary for the planned, orderly, and efficient development of the jurisdiction.

As discussed above, the City does not have sufficient land available within its current City limits to accommodate the light industrial uses this Project would allow. Four expansion areas, Adams Canyon, Fagan Canyon, West Area 2, and one planning area, East Area 2, are identified in the City's General Plan to accommodate needed growth. This proposed Project is located in the West Area 2 Expansion Area, which is the primary area planned to meet the City's need for additional light industrial land.

As shown, the proposed Project is consistent with factors (a) through (c).

3.3.5.3 Impacts on Adjoining Prime Agricultural or Existing Open Space Lands

In making the determination whether conversion will adversely impact adjoining prime agricultural or existing open space lands, the Commission will consider the following factors:

a. The prime agricultural and open space significance of the territory and adjacent areas relative to other agricultural and existing open space lands in the region.

Approximately 49 acres of the 54-acre Project Site are currently under agricultural cultivation

The Project Site includes 49.1 acres of land meeting the definition of prime agricultural land in Government Code Section 56064.

The Project Site contains approximately 44.20 acres of prime farmland, 4.88 acres of farmland of Statewide importance, and 4.48 acres of urban and built-up land as designated on the current State Important Farmland Map.

As of 2016, Ventura County had approximately 118,508 acres of important farmland, which included 40,976 acres of prime farmland and 32,992 acres of farmland of Statewide importance.¹⁰ The 44.20 acres of prime farmland and 4.88 acres of farmland of Statewide importance currently under agricultural cultivation within the Project Site account for 0.1 percent of the total prime farmland in Ventura County and 0.01 percent of the total of farmland of Statewide importance within the County.

Additionally, the land directly west of the Project Site is part of the Ventura-Santa Paula Greenbelt and will not annexed or developed. Annexation and development of the Project Site in accordance with the proposed Specific Plan, which includes a buffer to ensure compatibility with agricultural land

10 California Department of Conservation, Farmland Mapping and Monitoring Program, Ventura County, Land Use Conversion Table, <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Ventura.aspx>.

around the site will not affect the large amount of remaining high quality agricultural land in the County.

b. *The economic viability of the prime agricultural lands to be converted.*

The Project Site is currently farmed by two organizations: Bender Farms and McGrath Farms. Bender Farms grows avocados on approximately 9.2 acres of land and herbs on approximately 12.3 acres. McGrath Farms grows a variety of row crops on approximately 27.5 acres of land. The proposed Project contains 44 acres of prime agricultural land that would be converted. The County of Ventura has determined that prime agricultural lands in the County are highly productive and are capable of supporting commercially viable agricultural operations on parcels as small as 9 acres.¹¹ At 44 acres, continued agricultural operations are economically viable.

c. *The health and well-being of any urban residents adjacent to the prime agricultural lands to be converted.*

The health and well-being of urban residents adjacent to the proposal area are unlikely to be impacted as a result of the conversion of the agricultural land within the proposed SOI amendment. The existing residential development to the north is separated by Telegraph Road, which has a width of approximately 50 feet, from the Project Site. The proposed light industrial and business park uses would be developed in accordance with the development and design standards in the proposed Specific Plan, will be compatible with the nearest residential uses, and will not affect the health or well-being of the residents of this neighborhood

d. *The use of the territory and the adjacent areas.*

Residential and agricultural uses surround the Project Site. To the north of the Project Site and Telegraph Road are primarily single-family residences accessed from Country View Court, as well as a mobile home park accessed from Valencia Way. The southern portion of the Project Site is bound by SR 126; just beyond the freeway exist agricultural uses that grow various row crops, avocados, and citrus, and contain a limited number of single-family residential units within some of the properties. To the east of the Project Site, along Beckwith Road, are light industrial uses to the east, including offices, warehouse buildings, construction equipment storage, and maintenance facilities. The Adams Barranca is located adjacent to the western boundary of the Project Site; agricultural uses and limited single-family residences, consisting of orchards and a limited number of livestock, are located immediately west of the Adams Barranca.

Similar industrial uses currently exist to the east of the Project boundary. Additionally, man-made or natural boundaries would separate uses from the north, south, and west portions of the Project Site. The proposed light

11 Ventura County Land Conservation Act Guidelines. Adopted November 22, 2011; December 8, 2015, edition.

industrial and business park uses would be developed in accordance with the development and design standards in the proposed Specific Plan, will be compatible with the surrounding uses.

e. Whether public facilities related to the proposal would be sized or situated so as to facilitate the conversion of prime agricultural or existing open space land outside of the agency's sphere of influence, or will be extended through prime agricultural or existing open space lands outside the agency's sphere of influence.

The City has sewer and water master plans designed to serve uses allowed by the City's General Plan, including the uses in the West Area 2 Expansion Area, which includes the Project Site. Sewer and water facilities would be provided to serve the site consistent with these master plans and would not be sized to accommodate additional growth. The Project would also not involve any road improvements that could induce growth of adjacent agricultural or open space land.

f. Whether natural or man-made barriers serve to buffer prime agricultural or existing open space lands outside of the agency's sphere of influence from the effects of the proposal.

The west portion of the Project Site will have a buffer between the Adams Barranca and the proposed Project, which will create a buffer between the existing prime agriculture to the west and the proposed Project Site. Additionally, Faulkner Road, and the 126 Freeway, places a buffer between the proposed Project and the agricultural land to the south of the Project Site.

g. Applicable provisions of local general plans, applicable ordinances that require voter approval prior to the extension of urban services or changes to general plan designations, Greenbelt Agreements, applicable growth-management policies, and statutory provisions designed to protect agriculture or existing open space.

The affected territory is not subject to voter approval for the extension of services or for the proposed minor changes in existing City General Plan land use designations. The proposed Specific Plan would include the annexation of land located within the City's voter approved CURB. Measure L6 is not triggered by the proposed Project.

h. Comments and recommendations by the Ventura County Agricultural Commissioner.

No comments or recommendations directly involving the Project were received from the Agricultural Commissioner. In addition, the Project is consistent with the Agricultural Policy Advisory Committee's Agricultural/Urban Buffer Policy, which requires new dwellings, nonagricultural work sites, and ongoing outdoor public activities that may potentially conflict with agricultural operations to include a buffer/setback

and fencing. The proposed Project will provide a buffer zone adjacent to the Adams Barranca to the west and is separated from adjacent lands by existing roadways (Faulkner Road to the south, Beckwith Road to the east, and Telegraph Road to the north).

As shown, the proposed Project does not conflict with factors (a) thru (h).

3.3.5.4 Territory Subject to a Land Conservation Act (Williamson Act) Contract

LAFCo will not approve a proposal which includes the annexation of territory subject to an active Land Conservation Act contract to a city or special district that provides or would provide facilities and/or services other than those that support the land uses that are allowed under the contract. For purposes of this section, an active Land Conservation Act contract includes a contract for which a notice of non-renewal has been filed.

The proposed Project is consistent with Policy 3.3.5.4. The proposed Project does not contain any parcels subject to a Williamson Act contract.

Section 4.11, Noise

Page

Revision:

4.11-16-17

Santa Paula Municipal Code

Annexation of the Santa Paula West Business Park into the City of Santa Paula is planned to occur as part of the Specific Plan approval process. Santa Paula Municipal Code (SPMC) Chapter 93 sets noise standards for the City. SPMC Section 93.21 establishes the acceptable exterior noise standard for residential uses of 65 dB(A) from 7:00 AM through 10:00 PM, and of 60 dB(A) from 10:00 PM through 7:00 AM. The exterior noise standard for other noise-sensitive uses, including schools, libraries, hospitals, community care facilities, and assembly halls, is 65 dB(A) at all times. According to the SPMC, commercial and office uses cannot exceed an outdoor noise level of 70 dB(A), and neighborhood commercial uses cannot experience an external noise level of more than 65 dB(A). Industrial uses cannot to exceed an external noise level of more than 75 dB(A). The SPMC ~~does~~ has not yet set acceptable interior noise level standards.

4.11-24

Project Impacts

As previously discussed, an increase of 3 dB(A) or greater in traffic noise levels that occurs from Project-related activities would be considered significant if the resulting noise levels that occurs from Project-related activities would exceed the

City Noise Compatibility Matrix for “acceptable” exterior or interior noise levels. These roadway systems ~~will do~~ not experience an increase in noise levels of 3 dB(A) or greater. In addition, vehicle trips and traffic noise levels would remain the same with the proposed Beckwith Road extension and would not cause an increase of 3 dB(A) or greater due to Project-related activities. Therefore, the Santa Paula West Specific Plan Area would not result in significant noise impacts in the local and regional street system. Impacts along these roadway systems are considered less than significant.

4.11-25**Project Impacts**

As mentioned previously, exterior-to-interior reduction of noise is generally 25 dB(A) or more. Assuming noise levels at 69.4 dB(A) within 50 feet from the railway centerline, interior noise ~~could~~ will be reduced to 44.4 dB(A), below the General Plan noise threshold of 45 dB(A), in compliance with the City’s Building Code. Therefore, potential interior noise within the proposed development would be considered less than significant.

4.11-26**Project Impacts**

Loaded trucks and large bulldozers are capable of producing approximately 86 and 87 VdB, respectively, at 25 feet. The surrounding land uses within 25 feet of the Project Site include the scattered residential uses immediately to the west. The construction near this portion of this site may include some earthwork and grading activities. While offsite surrounding land uses may experience vibration events, these would be temporary and would not be frequent and impacts would be considered less than significant.

4.11-29**Project Impacts**

~~Average daily trips associated with construction activities would not result in a doubling of trip volume along study-area roadways. Given that it takes a doubling of average daily trips on roadways to increase noise by 3 dB(A), the average daily trips associated with construction activities would not result in a doubling of trip volume along study-area roadways. the n~~ Average daily trips associated with construction activities would not result in a doubling of trip volume along study-area roadways. Given that it takes a doubling of average daily trips on roadways to increase noise by 3 dB(A), the average daily trips associated with construction activities would not result in a doubling of trip volume along study-area roadways. the n Noise-level increases associated with construction vehicle trips along major arterials in the City of Santa Paula and nearby roadways that are within the area (unincorporated County of

Ventura) would be less than 3 dB(A), and potential impacts will be less than significant.

Section 4.12, Public Services

4.12-16 Project Impacts

~~Furthermore, as part of the review of the Specific Plan, the City of Santa Paula and Project Applicant will enter into a Development Agreement with the property owner that addresses the funding of public services, including fire protection services. Under the terms of the Development Agreement, the Project Applicant and/or developer will be required to contribute funding through development impact fees to the City to contribute toward ongoing fire protection facilities and personnel costs. No new facilities would be required to serve the Project Site as a result of the implementation of the Specific Plan. As such, mitigation is not required.~~

4.12-18 Cumulative Impacts

The City has regulations and ordinances in place to address impacts on public services (e.g., police, fire), including the provision and acquisition of new facilities and equipment. All planned development would be reviewed by the respective agencies and corresponding mitigation design features and payment of existing fees would be required prior to building permit issuance. Therefore, cumulative impacts associated with public services would be less than significant.

Section 4.13, Transportation and Traffic

Page Revision:

4.13-26 Project Impacts

The summary of the freeway and multilane highway impacts analyses is provided in **Table 4.13-6, Existing plus Project Impacts—Freeway and Multilane Segments**. The five freeway segments currently operate at LOS C or better in both directions. Based on the significance threshold for the Los Angeles County CMP, the Project ~~does~~ will not operate at LOS F after the addition of project traffic and the Project does not cause a net increase in traffic demand of 2 percent of

capacity or more. Therefore, the Project would result in less than significant impacts to freeway and multilane segments.

4.13-27 **Project Impacts**

The City's General Plan includes goals to ensure that City residents have alternative transportation opportunities, such as public transit, bikeways, and pedestrian routes.

4.13-39 **Mitigation Measures, MM TRA-1**

Peck Road & Harvard Boulevard/Telegraph Road/Main Street (Intersection 8).

This intersection could be mitigated to LOS C or better with the addition of one travel lane to both the northbound and southbound approaches on Peck Road and the addition of a northbound right overlap phase. The northbound lane configuration would be one right-turn lane, two through lanes, and one left-turn lane. The northbound right-turn movement would also have an overlap signal head installed to accommodate the overlap phase. The southbound lane configuration would be one shared through/right-turn lane, one through lane, and one left-turn lane.

Since this is a cumulative impact, the Project applicant ~~would~~ shall be responsible for their fair share contribution for this mitigation improvement.

4.13-40 **Mitigation Measures**

10th Street & Harvard Boulevard (Intersection 1) – No feasible ~~MM~~ mitigation measures are ~~from prior major projects in Santa Paula were investigated along the Ojai Road corridor available~~. A beautification project including bicycle lanes is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a ~~possible~~ physically feasible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, cumulative impacts to this intersection cannot be fully mitigated. Alternatively, a peak-hour parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include on shared through/right turn lane, one through lane (during peak hours), and on left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would

result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B under the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these improvements mitigations were not considered as to be a feasible mitigation measure.

4.13-29

Mitigation Measures

10th Street & Harvard Boulevard (Intersection 1) – No feasible Mmitigation measures are ~~from prior major projects in Santa Paula were investigated along the Ojai Road corridor available.~~ A beautification project including bicycle lanes is planned along 10th Street at this location; therefore, widening of 10th Street to gain capacity was not considered as a ~~possible~~ physically feasible mitigation. Given the constraints of the intersection and the proposed bicycle lanes, cumulative impacts to this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable. Alternatively, a peak-hour parking restriction on the southbound approach would allow for the reconfiguration of the southbound approach to include one shared through/right-turn lane, one through lane (during peak hours), and one left-turn lane. The northbound approach could be restriped to provide one right-turn lane, one through lane, and one left-turn lane. In combination, these measures would result in an improvement from LOS C during the AM peak hour and LOS D during the PM peak hour to LOS A during the AM peak hour and LOS B during the PM peak hour, thus mitigating the increase in V/C ratio attributable to project traffic. However, due to the planned bicycle lanes, these mitigations were not considered as a feasible mitigation. The constraints of the intersection and the proposed bicycle lanes discussed under the Existing plus Project scenario would also apply to the Cumulative plus Project scenario. Therefore, this intersection cannot be fully mitigated, and the impact would remain significant and unavoidable.

Section 4.14, Utilities and Service Systems

Section 4.14, Utilities and Service Systems, of the Draft EIR was updated to reflect the Final Water Supply Assessment for the Proposed Santa Paula West Business Park Specific Plan Project (Final WSA). The Final WSA was updated to reflect the Final 2016 Urban Water Management Plan (UWMP) released in August 2017. The 2016 UWMP had many updates but specially there were, updated generation rates, updated current and future supplies and demands through 2040, and updated water production, recycled water, groundwater allocations and transfers. Due to the updated UWMP, many changes were made to the

water portion of the Utilities and Service Systems. This section can be found with strike throughs for deletions and double underlines for insertions in **Appendix A**. The changes largely consist of changes to water supply and demand numbers; changes to **Tables 4.14-1** through **4.14-4**, **4.14-6**, and **4.14-10**; and updating references to the 2016 Final UWMP.

Section 5.0, Alternatives

Section 5.0, Alternatives, of the Draft EIR was updated to reflect grammar and minor technical errors. The following changes were made:

<u>Page</u>	<u>Revision:</u>
5.0-2	<p>Project Objectives</p> <p>1. Help revitalize the existing built environment and economic climate of the City by permitting new investment and development in West Area 2 that reflects and complements the existing pattern and scale of development in Santa Paula, <u>as envisioned in the City's General Plan</u>;</p>
5.0-9	<p>Conclusion and Relationship to Project Objectives</p> <p>Land use and water usage impacts for the proposed Project would be significantly fewer <u>less</u> than those under the No Project–No Development Alternative. While this alternative would not generate any impacts to water or land use, the impacts of this alternative could be considered greater than the proposed Project.</p>
5.0-9	<p>Alternative 2: 25 Percent Reduction, Description of Alternative</p> <p>This alternative assumes that there would be a 25 percent reduction in the 53.81 acres that makes up the proposed Project. This assumes that 75 percent, or approximately 40.36 acres of the Project would be built with the Specific Plan <u>area</u>, and 25 percent, or approximately 13.45 acres would remain under the jurisdiction of the County of Ventura with land use subject to the County's General Plan and zoning, and agricultural operations would still continue.</p>
5.0-13	<p>Cultural Resources</p> <p>This alternative would develop a smaller portion of the site with commercial and light industrial uses. This alternative would have a similar potential to uncover previously unknown archaeological resources and human remains. Compliance</p>

with the Mitigation Measures during the construction phase would ensure development would not result in significant impacts to potential cultural resources. Impacts would be similar to those of the proposed Project, and less than significant.

5.0-13-14

Greenhouse Gas

The proposed Project would generate a net increase of approximately 5,546 ADT while 4,160 ADT could be generated under Alternative 2. As with the proposed Project, GHG emissions would be generated by area, energy, and mobile sources, waste disposal, and water and wastewater treatment and conveyance, with mobile sources generating the majority of the overall GHG emissions. All industrial land use projects that exceed 10,000 MTCO₂e per year are considered potentially significant under the South Coast Air Quality Management District (SCAQMD) screening threshold, which is recognized by the VCAPCD. The estimated Project operational GHG emissions with project design features was estimated to be 6,674.83 MTCO₂e per year, which would not exceed the screening threshold. Given that Alternative 2 includes a 25 percent reduction in uses, this alternative would result 5,006 MTCO₂e per year, which would not exceed the screening threshold. In addition, as with the proposed Project, development under Alternative 2 is expected to be consistent with all feasible and applicable strategies and the recommended measures of ARB Scoping Plan to reduce greenhouse gas emissions in California. Neither this alternative nor the proposed Specific Plan would result in significant greenhouse gas impacts; however, impacts under this alternative would be slightly ~~fewer~~ less.

5.0-14

Hazards and Hazardous Materials

While this alternative would result in a density reduction to approximately 40 acres, development would still occur; and impacts similar to those of the proposed Project, but at a reduced intensity, would occur. Construction of the Project would still require materials that could contain hazardous materials, such as fuels, solvents, oils, coatings, etc. that could spill or release. Additionally, agricultural land containing residual pesticides, would still be disturbed. Mitigation measures pertaining to these issues would still be implemented and impacts would be similar to that of the proposed Project, and less than significant.

5.0-15 Public Services

Without annexing approximately 13 acres to the City of Santa Paula, the City's municipal services needs would slightly decrease. However, there would still be a demand for the City's police, fire, and other City resources. Because there is no residential development involved, public schools and parks would not be impacted under this alternative. Similar to the proposed Project, the Project Applicant and/or developer will be required to contribute funding through development impact fees to the City to contribute toward ongoing fire protection and police services. Impacts would be similar to those of the proposed Project, and less than significant. ~~There would be similar, less than significant impacts under Alternative 2 as the proposed Project.~~

5.0-17 Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the Project alternatives is provided in **Table 5.0-3** at the end of this section.

The 25 Percent Reduction Alternative would reduce impacts to agricultural resources, air quality, greenhouse gas, transportation and traffic, wastewater, solid waste, and stormwater when compared to the proposed Project. However, significant and unavoidable impacts would not be avoided or substantially lessened. Land use impacts would be greater because this alternative would be potentially inconsistent with the goals and objectives of the General Plan Land Use Element, specifically, objective 5(f), "Sufficient land should be provided for all uses, including parks, low-density residential, industrial and neighborhood commercial, to accommodate projected population growth to the year 2020."~~The 25 Percent Reduction Alternative would result in reduced impacts when compared to the proposed Project. Land use is considered to be greater as it would create an unincorporated island and the general plan would not be fully implemented.~~

This alternative would meet the basic objectives defined by the City of Santa Paula for the proposed Project, but to a lesser degree.

5.0-17-5.0-18 Alternative 3: 50 Percent Reduction, Description of Alternative

Alternative 3 assumes that there would be a 50 percent reduction in the 53.81 acres that makes up the proposed Project. This assumes that 50 percent, or

approximately 26.90 acres of the Project would be built with the Specific Plan area, and 50 percent, or approximately 26.90 acres would remain under the jurisdiction of the County of Ventura with land use subject to the County's General Plan and zoning, and agricultural operations would still continue.

5.0-20 Cultural Resources

This alternative would develop a smaller portion of the site with commercial and light industrial uses. Alternative 3 would have a similar potential to uncover previously unknown archaeological resources and human remains. Compliance with the Mitigation Measures during the construction phase would ensure development would not result in significant impacts to potential cultural resources. Impacts would be similar to those of the proposed Project, and less than significant.

5.0-21 Hazards and Hazardous Materials

While this alternative would result in a density reduction to approximately 27 acres, development would still occur; and impacts similar to those of the proposed Project, but at a reduced intensity, would occur. Construction of the Project would still require materials that could contain hazardous materials, such as fuels, solvents, oils, coatings, etc. that could spill or release. Additionally, agricultural land containing residual pesticides, would still be disturbed. Mitigation measures pertaining to these issues would still be implemented and impacts would be similar to that of the proposed Project, and less than significant.

5.0-22 Public Services

Without annexing approximately 27 acres to the City of Santa Paula, the City's municipal services needs would slightly decrease. However, there would still be a demand for the City's police, fire, and other City resources. Because there is no residential development involved, public schools and parks would not be impacted under this alternative. Similar to the proposed Project, the Project Applicant and/or developer will be required to contribute funding through development impact fees to the City to contribute toward ongoing fire protection and police services. Impacts would be similar to those of the proposed Project, and less than significant. ~~There would be similar, less than significant impacts under Alternative 2 as the proposed Project.~~

5.0-24

Conclusion and Relationship to Project Objectives

A summary comparison of impacts associated with the Project alternatives is provided in **Table 5.0-3** at the end of this section.

The 50 Percent Reduction Alternative would result in reduced impacts to aesthetics, agricultural resources, air quality, biological resources, greenhouse gases, noise, transportation and traffic, wastewater, solid waste, and stormwater when compared to the proposed Project, and would avoid the significant and unavoidable traffic impact of the proposed Project at one intersection. Land use impacts would be greater because this alternative would be potentially inconsistent with the goals and objectives of the General Plan Land Use Element, specifically, objective 5(f), "Sufficient land should be provided for all uses, including parks, low-density residential, industrial and neighborhood commercial, to accommodate projected population growth to the year 2020."

~~The 50 Percent Reduction Alternative would result in reduced impacts where compared to the proposed Project, and avoid would avoid the significant and unavoidable impact of the proposed Project on transportation and traffic at one intersection. Land use impacts are considered to be greater because the general plan would not be fully implemented.~~

This alternative would meet the basic objectives defined by the City of Santa Paula for the proposed Project, but to a lesser degree.

5.0-25

Environmentally Superior Alternative

Alternative 1, the No Project Alternative, would have the fewest impacts and would not result in any significant impacts making it ~~and is~~ the environmentally superior alternative. However, the No Project Alternative would not meet the objectives of the proposed Project. As noted above, if the No Project Alternative is determined to be environmentally superior, the CEQA Guidelines require an environmentally superior alternative must also be identified among the remaining alternatives.

The environmentally superior alternative among the remaining alternatives would be ~~the~~ Alternative 3, the 50 Percent Reduction Alternative. This alternative would avoid the significant and unavoidable environmental impact identified at one intersection ~~under traffic for the proposed Project.~~

However, this alternative would not eliminate the significant and unavoidable impacts for aesthetics, agricultural resources, and air quality during construction; ~~and~~ would not be consistent with applicable land use policies; and would not achieve the basic objectives of the Project as defined by the City of Santa Paula. Additionally, water usage would be greater by approximately 120.6 afy when compared to the build-out of the proposed Project because of higher water use for existing agriculture.

5.0-25-26

Table 5.0-3 Comparison of Alternatives to the Proposed Project

	Proposed Project	Alternative 1	Alternative 2 No Project Existing Plans & Policies	Alternative 3 East Gateway Specific Plan & High Density Residential
Environmental Topic	Impacts with Mitigation	No Project Alternative	<u>25 Percent Reduction</u>	<u>50 Percent Reduction</u>