



Draft Program Environmental Impact Report

Santa Paula
2040 General Plan Update
State Clearinghouse #2017111033

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
af	acre-foot
afy	acre-feet per year
AQMP	air quality management plan
BAU	business as usual
BMP	best management practices
CAA	Clean Air Act
Cal/EPA	California Environmental Protection Agency
Cal Fire	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CAL/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CAP	climate action plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFCs	chlorofluorocarbons
CFR	Code of Federal Regulations
cfs	cubic feet per second
CGS	California Geological Survey
CH ₄	methane
CHRIS	California Historical Resources Information System
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO _{2e}	carbon dioxide equivalent
CPUC	California Public Utility Commission
CTC	California Transportation Commission
CUPA	Certified Unified Program Agency



CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DEIR	draft environmental impact report
DOF	Department of Finance
DMA 2000	Disaster Mitigation Act of 2000
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EDD	California Employment Development Department
EIR	environmental impact report
EOP	emergency operations plan
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gases
gpd	gallons per day
GWh	gigawatt hours
HCD	Housing and Community Development Department (California)
HCFC	hydrochlorofluorocarbons
HCM	Highway Capacity Manual
HCP	habitat conservation plan
HFC	hydrofluorocarbons
HMP	hazard mitigation plan
HRA	health risk assessment
HWMP	hazardous waste management plan
IFC	International Fire Code
ISO	Insurance Services Office
kwh	kilowatt-hours
Ldn	day-night sound level
Leq	equivalent continuous noise level
LAFCo	local agency formation commission
LID	low impact development
LOS	level of service
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
mg/L	milligrams per liter
MMT	million metric tons



City of Santa Paula
2040 General Plan Update
Draft Program EIR

MOU	memorandum of understanding
mpg	miles per gallon
mph	miles per hour
MPO	metropolitan planning organization
MS4	municipal separate storm sewer systems
MSWMP	municipal storm water management plan
MT	metric ton
MTBE	methyl tertiary butyl ether
MW	megawatts
N ₂ O	nitrous oxide
NAHC	Native American Heritage Commission
NFIP	National Flood Insurance Program
NOP	Notice of Preparation of an EIR
NOX	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	ozone
O&M	operations and maintenance
OES	California Office of Emergency Services
OHP	Office of Historic Preservation
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OSFM	Office of the State Fire Marshal
Pb	lead
PCBs	polychlorinated biphenyls
PFC	perfluorocarbons
PM	particulate matter
PM ₁₀	coarse inhalable particulate matter
PM _{2.5}	fine inhalable particulate matter
ppd	pounds per day
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
RCRA	Resource Conservation and Recovery Act
RHNA	regional housing needs assessment
RMS	root mean square
RTP	regional transportation plan
RTP/SCS	regional transportation plan / sustainable communities strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District



SCE	Southern California Edison
SCS	sustainable communities strategy
SFHA	special flood hazard areas
SIP	state implementation plan
SOI	sphere of influence
SOX	sulfur oxides
SPL	sound pressure level
SR	State Route
SWPPP	stormwater pollution prevention plan
SWQMP	stormwater quality management plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TDS	total dissolved solids
TIA	traffic impact analysis
TMDL	total maximum daily load
URM	unreinforced masonry buildings
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
v/c ratio	volume to capacity ratio
VCAPCD	Ventura County Air Pollution Control District
VCOG	Ventura Council of Governments
VCTC	Ventura County Transportation Commission
VCWPD	Ventura County Watershed Protection District
VdB	velocity decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compounds
WQMP	water quality management plan



1. Executive Summary

1.1 Overview

This document is an Environmental Impact Report (EIR) for the proposed 2040 Santa Paula General Plan update. This EIR addresses the environmental impacts that would result from reasonably foreseeable actions (e.g., subdivision maps, grading and building permits) that would result from City Council adoption of the 2040 General Plan. The General Plan is the City's primary long-range planning document and covers the entire City and its planning area (see **Exhibit 3.2-1 Regional Vicinity Map**).

No specific development projects are currently proposed in connection with the 2040 General Plan, and the precise configuration of any future developments would be determined through the development review process after submittal of the required applications by property owners.

1.2 Project Objectives

The following objectives have been established for the 2040 General Plan update and will aid the public and decision-makers in their review of the project and associated environmental impacts:

- Establish a long-range vision to the 2040 General Plan horizon year that reflects the desires of the community as expressed in the 2050 SAVE OPEN-SPACE and AGRICULTURAL RESOURCES (SOAR) Land Use Measure approved by the voters on November 8, 2016;
- Adopt policies to guide City decisions regarding private land use and development and City infrastructure plans consistent with the regional population, housing and jobs forecast assumed in the 2040 Regional Transportation Plan/Sustainable Communities Strategy;
- Preserve Santa Paula's small-town character and compact neighborhoods;
- Enhance the economic vitality and attractiveness of Downtown;
- Encourage land use and development patterns that preserve the character of the community, protect historic, cultural and environmental resources, minimize public safety hazards, promote healthy lifestyles and environmental justice, and expand economic opportunity for local residents and businesses;



- Encourage a full range of living options for residents of all ages and income levels, including urban townhouses and condominiums, rental apartments, move-up executive homes, senior and assisted living facilities, and accessory units;
- Enhance the City's fiscal sustainability through higher property values, increased tourism and sales tax revenues, and the efficient use of land and infrastructure;
- Promote environmental sustainability and the City's capacity to adapt successfully to climate change and other uncertainties; and
- Provide guidance for detailed plans and implementing actions, such as specific plans, the Development Code, subdivision regulations, design standards, capital improvement programs and City departmental procedures.

1.3 Alternatives

Alternatives to the Proposed Project that are evaluated in this EIR are summarized below and discussed in greater detail in **Chapter 5, Alternatives Analysis**.

1. **No Project.** This alternative would consist of future development according to the existing General Plan.
2. **Development within the 2018 Sphere of Influence.** Under this alternative, Adams Canyon and Fagan Canyon would be deleted as Expansion Areas and would not be annexed to the City, as reflected in the Sphere of Influence established by Ventura LAFCo in February 2018. Development of these properties would be limited to agriculture and other low-intensity uses consistent with the Ventura County General Plan and zoning regulations.

1.4 Areas of Concern

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) and a revised NOP were distributed for review by affected agencies and the public. The NOP, revised NOP and responses to both NOPs are presented in **Appendix A** of this EIR.

This EIR addresses the issues determined to be potentially significant by the NOPs, the responses to the NOPs, and scoping discussions among the public, consulting staff, and the City. The environmental topics addressed in Chapter 4 of this EIR include:

Aesthetics
Agriculture and Forestry Resources
Air Quality and Greenhouse Gas Emissions
Biological Resources



Cultural and Tribal Resources
Geology and Soils
Hazards and Hazardous Materials
Hydrology and Water Quality
Land Use and Planning
Mineral Resources
Noise
Population and Housing
Public Services
Recreation
Transportation
Utilities and Service Systems

This EIR addresses the issues referenced above and identifies whether significant environmental impacts would occur as a result of adoption of the 2040 General Plan, including cumulative effects, in accordance with the provisions set forth in the CEQA Guidelines. In addition, the EIR identifies mitigation measures, where feasible, that would reduce or eliminate adverse environmental effects.

In preparing the EIR, the analysis relied on applicable policies and standards from City regulatory documents as well as other relevant documents, including other environmental documents.

1.5 Summary of Impacts

Table 1.5-1 below summarizes the environmental impacts, mitigation measures and level of significance for each impact. Where potential impacts cannot be reduced to a level that is less than significant through the adoption of General Plan policies or mitigation measures, the City must adopt findings and a Statement of Overriding Considerations as described in §15093 of the CEQA Guidelines.



Table 1.5-1 Summary of Impacts and Mitigation Measures

Statement of Impacts	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.2 Aesthetics			
Impact AES-1: Substantial adverse effect on a scenic vista	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact AES-2: Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway	Less than significant	None required	Less than significant
Impact AES-3: Degradation of the existing visual character or quality of public views of the site and its surroundings in non-urbanized areas; or conflict with applicable zoning and other regulations governing scenic quality in an urbanized area	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact AES-4: Creation of a new source of substantial light or glare	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
4.3 Agriculture and Forestry Resources			
Impact AG-1: Convert important farmland to non-agricultural use	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact AG-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract	Less than significant	None required	Less than significant
Impact AG-3: Conflict with existing zoning for forest land or loss of forest land	No impact	None required	Less than significant
Impact AG-4: Involve other changes that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use	Less than significant	None required	Less than significant
4.4 Air Quality and Greenhouse Gas Emissions			
Impact AQ/GHG-1: Conflict with or obstruct implementation of the applicable air quality plan	Less than significant	None required	Less than significant



Statement of Impacts	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact AQ/GHG-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard	While the proposed 2040 General Plan policies and VCAPCD regulations would substantially reduce short-term impacts associated with development as anticipated in the proposed Plan, these impacts are considered significant and unavoidable. Long-term impacts would be less than significant, however.	Existing City regulations, measures adopted by VCAPCD, and State regulations regarding motor vehicle emissions standards, architectural coatings, and Title 24 energy efficiency standards all help to mitigate air quality impacts, and all feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs.	Short-term impacts due to construction would be significant and unavoidable. Long-term operational impacts would be less than significant.
Impact AQ/GHG-3: Expose sensitive receptors to substantial pollutant concentrations	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact AQ/GHG-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people	Less than significant	None required	Less than significant
Impact AQ/GHG 5: Increase in GHG emissions compared to existing conditions (2015)	Less than significant	None required	Less than significant
Impact AQ/GHG-6: Potential to conflict with SB 375 GHG emission reduction targets	Less than significant	None required	Less than significant
Impact AQ/GHG-7: Potential to conflict with AB 32 or other applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs	Less than significant	None required	Less than significant
4.5 Biological Resources			
Impact BIO-1: Substantial adverse effect on a candidate, sensitive, or special status species	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact BIO-2: Substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact



Statement of Impacts	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact BIO-3: Substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	Less than significant	None required	Less than significant
Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	Less than significant	None required	Less than significant
4.6 Cultural and Tribal Resources			
Impact CUL-1: Substantial adverse change in the significance of a historic resource	Less than significant	None required	Less than significant
Impact CUL-2: Substantial adverse change in the significance of an archaeological resource	Less than significant	None required	Less than significant
Impact CUL-3: Substantial adverse change in the significance of a tribal cultural resource	Less than significant	None required	Less than significant
Impact CUL-4: Disturb any human remains	Less than significant	None required	Less than significant
4.7 Energy			
Impact EN-1: Wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	Less than significant	None required	Less than significant
Impact EN-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	Less than significant	None required	Less than significant
4.8 Geology and Soils			
Impact GEO-1: Effects due to rupture of a known earthquake fault, Strong seismic ground shaking, Seismic-related ground failure including liquefaction, landslides, soil erosion, or unstable or expansive soil	Less than significant	None required	Less than significant



Statement of Impacts	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact GEO-2: Directly or indirectly destroy a significant paleontological resource or site or unique geologic feature	Less than significant	None required	Less than significant
4.9 Hazards and Hazardous Materials			
Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through upset and accidents involving the release of hazardous materials	Less than significant	None required	Less than significant
Impact HAZ-2: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school	Less than significant	None required	Less than significant
Impact HAZ-3: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment	Less than significant	None required	Less than significant
Impact HAZ-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport or within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact HAZ-5: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	Less than significant	None required	Less than significant
4.10 Hydrology and Water Quality			
Impact HYD-1: Violate water quality standards or waste discharge requirements, substantially degrade surface or groundwater quality, or conflict with a water quality control plan	Less than significant	None required	Less than significant
Impact HYD-2: Groundwater supplies, recharge and groundwater basin management	Less than significant	None required	Less than significant
Impact HYD-3: Alteration of drainage patterns resulting in erosion, siltation, flooding, or water pollution	Less than significant	None required	Less than significant



Statement of Impacts	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact HYD-4: Risk release of pollutants due to inundation in flood hazard, tsunami or seiche zones	Less than significant	None required	Less than significant
4.11 Land Use and Planning			
Impact LU-1: Physically divide an established community	Less than significant	None required	Less than significant
Impact LU-2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	Less than significant	None required	Less than significant
4.12 Mineral Resources			
Impact MR-1: Loss of availability of a known mineral resource	Less than significant	None required	Less than significant
4.13 Noise			
Impact N-1: Temporary increase in noise levels	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact N-2: Permanent increase in noise levels	Traffic noise: Potentially significant Other noise sources: Less than significant	Traffic noise: All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs Other noise sources: None required	Traffic noise: Significant impact Other noise sources: Less than significant
Impact N-3: Generation of excessive groundborne vibration or noise	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact N-4: Aviation noise	Less than significant	None required	Less than significant
4.14 Population and Housing			
Impact PH-1: Induce substantial unplanned population growth	Less than significant	None required	Less than significant
Impact PH-2: Displacement of substantial numbers of people or houses	Less than significant	None required	Less than significant
4.15 Public Services			
Impact PS-1: Increased demand for fire protection facilities	Less than significant	None required	Less than significant
Impact PS-2: Increased demand for police protection facilities	Less than significant	None required	Less than significant



Statement of Impacts	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact PS-3: Increased demand for school facilities	Less than significant	None required	Less than significant
Impact PS-4: Increased demand for library facilities	Less than significant	None required	Less than significant
Impact PS-5: Increased demand for other public facilities	Less than significant	None required	Less than significant
4.16 Recreation			
Impact REC-1: Substantial physical deterioration of existing parks or recreational facilities, or impacts due to expansion or development of parks or recreational facilities	Less than significant	None required	Less than significant
4.17 Transportation			
T-1: Conflicts with a program, plan, ordinance or policy addressing roadways	Less than significant	None required	Less than significant
T-2: Conflicts with a program, plan, ordinance or policy addressing public transit	Less than significant	None required	Less than significant
T-3: Conflicts with a program, plan, ordinance or policy addressing pedestrian and bicycle facilities	Less than significant	None required	Less than significant
T-4: Conflict or be inconsistent with CEQA Guidelines §15064.3(b)	Less than significant	None required	Less than significant
T-5: Hazardous geometric design features or incompatible uses	Less than significant	None required	Less than significant
T-6: Inadequate emergency access	Less than significant	None required	Less than significant
4.18 Utilities and Service Systems			
UTIL-1: Sufficient water supplies available to serve the project	Less than significant	None required	Less than significant
UTIL-2: Wastewater treatment capacity	Less than significant	None required	Less than significant
UTIL-3: Landfill capacity and compliance with solid waste regulations	Less than significant	None required	Less than significant



Statement of Impacts	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.19 Wildfire			
Impact WF-1: Exacerbate wildfire risk and related exposure to pollutants	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact WF-2: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact
Impact WF-3: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Potentially significant	All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.	Significant impact



2. Introduction

2.1 Purpose and Legal Authority

This EIR has been prepared in accordance with the California Environmental Quality Act (CEQA), and the CEQA Guidelines. In accordance with §15121(a) of the CEQA Guidelines, the purpose of this EIR is to serve as an informational document that:

...will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project...

This document is a Program EIR (PEIR). Section 15168(a) of the CEQA Guidelines outlines the PEIR process as follows:

- (A) General. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
 - (1) Geographically;
 - (2) As logical parts in a chain of contemplated actions;
 - (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or
 - (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.
- (B) Advantages. Use of a program EIR can provide the following advantages. The program EIR can:
 - (1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,
 - (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,
 - (3) Avoid duplicative reconsideration of basic policy considerations,
 - (4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and
 - (5) Allow reduction in paperwork.
- (C) Use with Later Activities. Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.



- (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
- (2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.
- (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the program.
- (4) Where the subsequent activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.
- (5) A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

This report serves as an informational document for the public and City decision-makers. The process will culminate with Planning Commission and City Council hearings to consider certification of the Final PEIR and a decision whether to approve the proposed 2040 General Plan (the “Plan” or the “Project”). If approved, the PEIR will provide a first-tier, programmatic environmental analysis, for the evaluation of subsequent projects, and facilitate avoidance, reduction, and minimization of direct and indirect impacts, growth-inducing impacts, and cumulative environmental impacts with respect to specific projects.

The focus of the environmental analysis in the PEIR is on citywide cumulative impacts of implementation of the Plan. The 2040 planning horizon requires that individual projects assumed to occur under the Plan are identified at a conceptual level. This PEIR addresses environmental impacts to the level that they can be assessed without undue speculation (CEQA Guidelines §15145) and acknowledges the uncertainty in such an analysis.

2.2 How to Use This Document

This EIR has been prepared to include all of the required contents described in the CEQA Guidelines (14 CCR Article 9 starting at §15120), as summarized below.

Chapter 1- Executive Summary includes an abbreviated Project Description, and a series of tables that summarize all of the potential impacts and mitigation measures presented in Chapter 4. The Executive Summary identifies the level of significance for each potential impact.



Chapter 2 – Introduction provides an overview of the EIR’s purpose and legal authority, the scope and content of the EIR, the steps in the EIR process, and opportunities for public review and comment.

Chapter 3 – Project Description includes a brief Environmental Setting that provides some regional context for the project. A more detailed discussion regarding the environmental setting relative to specific issues is presented within each topical in Chapter 4. The Project Description also includes the Project Objectives, a summary of the main characteristics of the proposed Plan, and the Intended Uses of the EIR.

Chapter 4 – Environmental Setting and Impact Analysis contains an analysis of each environmental topic (e.g., aesthetics, air quality, etc.). Within each of the topical sections in Chapter 4, information is presented in the following order:

1. Setting (including Existing Physical Conditions and Regulatory Framework)
2. Thresholds of Significance
3. Environmental Impact Analysis

The discussion of environmental impacts considers both direct and indirect impacts of the proposed Plan as well as short-term impacts (primarily during construction) and long-term impacts related to ongoing operations.

An analysis of potential alternatives to the Proposed Project are presented in **Chapter 5 – Alternatives Analysis**.

Chapter 6 describes the significant irreversible changes if the Project is approved, while **Chapter 7** addresses growth-inducing impacts.

Chapter 8 discusses the cumulative impacts of the proposed General Plan in relation to impacts of other projects throughout the region.

Chapters 9 and 10 of the EIR list the organizations consulted during preparation of the EIR and the personnel who prepared the EIR.

Volume II contains background information and supporting technical studies presented in the following appendices:

- | | |
|------------|--|
| Appendix A | Initial Study/Notice of Preparation and Scoping Comments |
| Appendix B | Tribal Consultation |
| Appendix C | Noise Analysis |
| Appendix D | Circulation and Mobility Technical Report |



2.3 Scope and Content

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) was distributed for review by affected agencies and the public. The NOP and responses to the NOP are presented in **Appendix A**.

This EIR addresses the issues that were determined to be potentially significant in the NOP, and in comments received during the scoping process. All of the issues listed in CEQA Guidelines Appendix G (Environmental Checklist) are addressed in this EIR.

This EIR identifies whether significant environmental impacts would be reasonably expected to occur as a result of adoption and implementation of the proposed 2040 General Plan in accordance with the provisions set forth in the CEQA Guidelines. If potentially significant impacts are identified, the EIR examines feasible mitigation measures that would reduce or eliminate adverse environmental effects.

The environmental analysis relies on applicable policies and standards from City regulatory documents, such as the Municipal Code, and other relevant documents.

The Alternatives section of the EIR was prepared in accordance with §15126(d) of the CEQA Guidelines and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the proposed General Plan while feasibly attaining most of the basic objectives of the General Plan. In addition, the EIR identifies the "environmentally superior" alternative from the alternatives assessed.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. The CEQA Guidelines provide the standard of adequacy on which this document is based. The CEQA Guidelines state:

An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but, the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure. (*Section 15151*)



2.4 EIR Process

The EIR review process, as required under CEQA, is outlined below in sequential order.

1. Notice of Preparation (NOP). Immediately after deciding that an EIR is required, the Lead Agency must file an NOP soliciting input on the EIR scope to "responsible," "trustee," and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties previously requesting notice in writing (CEQA Guidelines §15082; *California Public Resources Code* §21092.2). An NOP was distributed for public review on February 1, 2017 and a public scoping meeting was conducted on March 2, 2017. Based on comments received, the City prepared and distributed a revised NOP on November 8, 2017. The revised NOP reflected the City's decision to prepare a Program EIR rather than a Supplemental EIR. The revised NOP was circulated for a 30-day review period that ended December 11, 2017. The NOP was provided to the State Clearinghouse and posted in the City Clerk's office for 30 days. The City also conducted a second public scoping meeting on November 28, 2017. A copy of the original NOP, the revised NOP and all comments received during both NOP review periods are provided in **Appendix A**.
2. Draft EIR (DEIR) Public Notice and Review. After the DEIR is prepared, a Notice of Completion (NOC) is delivered to the Office of Planning and Research (OPR) as required by CEQA Guidelines §15085. The City as Lead Agency also transmitted a copy of the NOC to the Ventura County Clerk, trustee and responsible agencies, and persons or organizations who submitted comments on the NOP or who requested notice pursuant to CEQA Guidelines §15087. Additionally, the NOC was posted at City Hall, on the City website, and was published in a newspaper of general circulation.
3. Final EIR (FEIR). The FEIR must include: a) the DEIR; b) comments received during public review of the DEIR; c) a list of persons and entities commenting; and d) responses to comments.
5. Certification of FEIR. The Lead Agency shall certify that: a) the FEIR has been completed in compliance with CEQA; b) the FEIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the FEIR prior to approving the project (CEQA Guidelines §15090).
6. Lead Agency Project Decision. A Lead Agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or, c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (CEQA Guidelines §15042 and §15043).



7. Findings/Statement of Overriding Considerations. For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or, c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines §15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic or other reasons supporting the agency's decision.
8. Mitigation Monitoring/Reporting Program. When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. Notice of Determination (NOD). The Lead Agency must file an NOD after deciding to approve a project for which an EIR is prepared (CEQA Guidelines §15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA challenges (*Public Resources Code* §21167[c]).

2.5 Availability of the Environmental Impact Report

This EIR is being distributed to public agencies, organizations and interested groups and individuals for comment during the required public review period. The DEIR was also made available for review on the City website (www.mysantapaula.com) and at the following location:

City of Santa Paula Community Development Department
200 S. Tenth Street
Santa Paula, CA 93061



3. Project Description

3.1 Project Background

This Program EIR analyzes the environmental effects of the proposed 2040 Santa Paula General Plan (the “Proposed Project”). Under *California Government Code* §65300, et seq., cities are required to prepare a “...comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency’s judgment bears relation to its planning.” The general plan must be an integrated, internally consistent statement of city policies.

California Government Code §65302 requires that a general plan include the following seven elements: land use, circulation, housing, conservation, open space, noise, and safety. State law also allows cities to combine elements and include additional (or optional) elements in general plans. An optional element included in the 2040 General Plan addresses community desires related to economic development and the enhancement of Downtown Santa Paula. All elements of the proposed General Plan have equal weight. Additional information regarding the organization of the 2040 General Plan is provided in **Section 3.4-1** below. The complete draft 2040 General Plan can be accessed on the project website (www.MySantaPaula.com) or at the Community Development Department office located at 200 S. Tenth Street, Santa Paula, California.

3.2 Project Location

The City of Santa Paula is located approximately 65 miles northwest of Los Angeles and 14 miles east of Ventura. It is at the geographical center of Ventura County in the rich agricultural Santa Clara River Valley. The city is surrounded by rolling hills and rugged mountain peaks, in addition to orange, lemon, and avocado groves. **Exhibit 3.2-1** shows the general location of Santa Paula while **Exhibit 3.2-2** shows adopted boundaries that influence land use and planning within the Santa Paula Planning Area.

3. Project Description
3.2 – Project Location

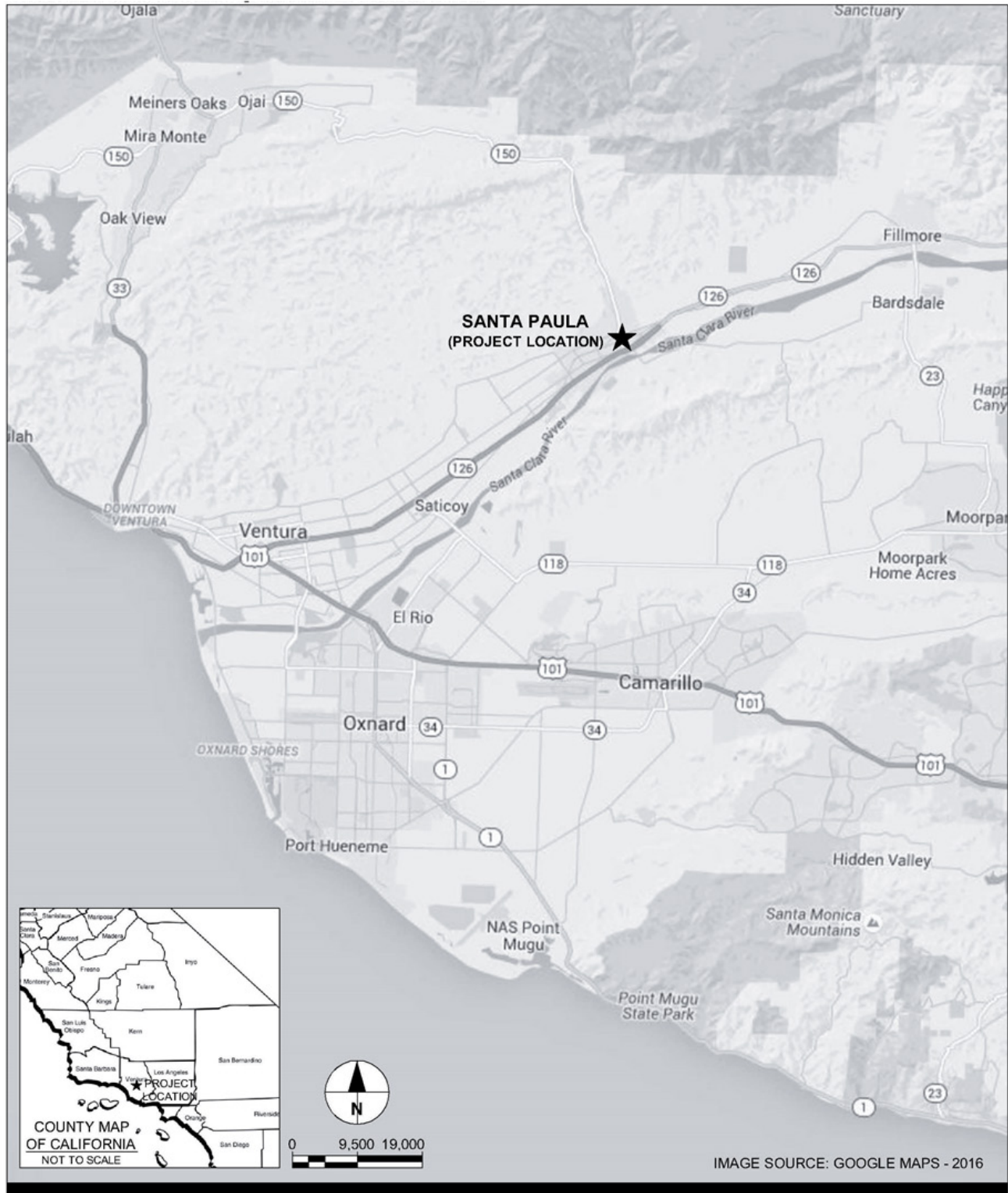


Exhibit 3.2-1 Regional Vicinity Map

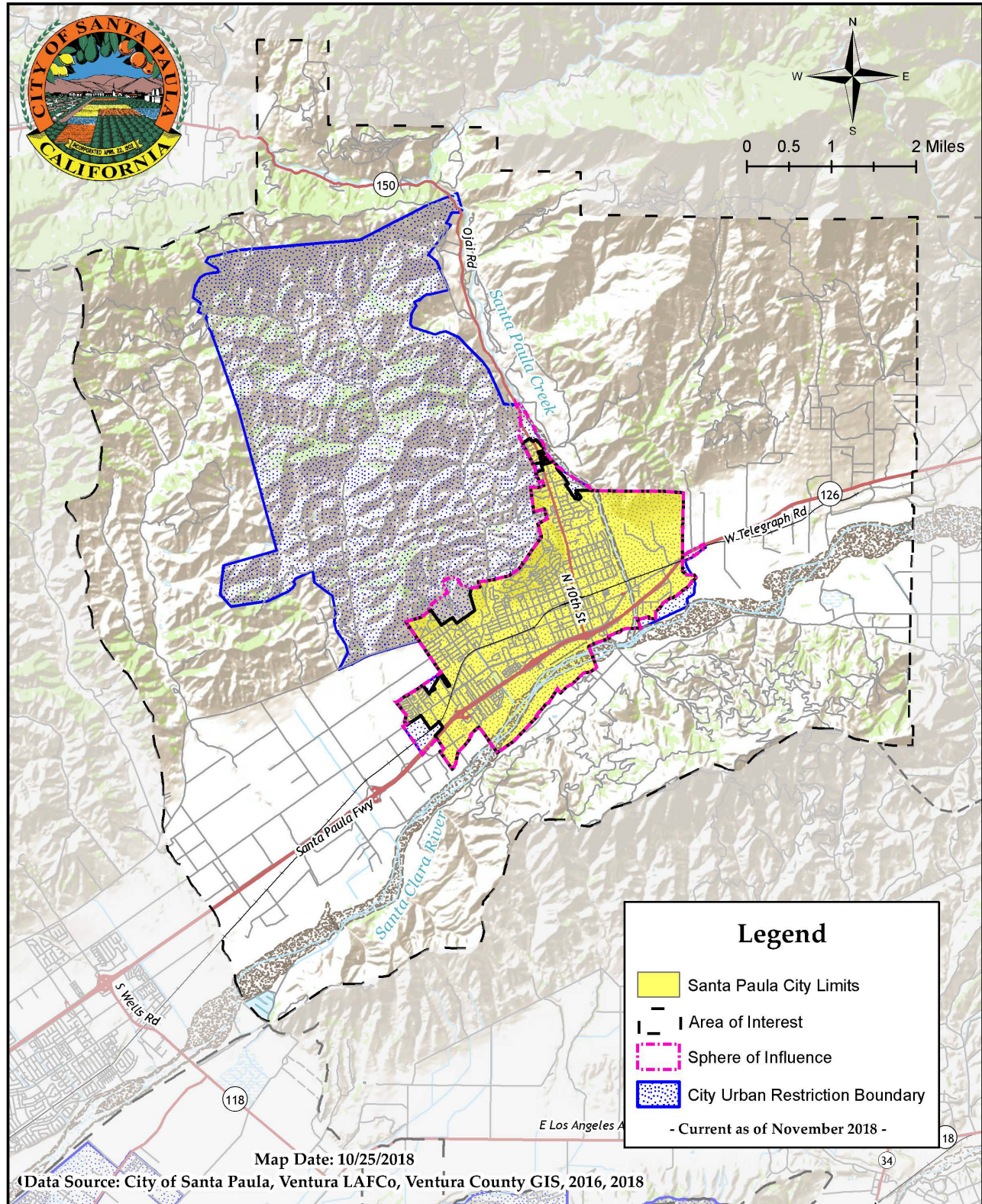


Exhibit 3.2-2 Santa Paula Planning Areas



These boundaries are summarized as follows:¹

1. Santa Paula's "Area of Interest" was established in 2009 by Ventura County LAFCo, Ventura County and all its incorporated cities. Santa Paula's Area of Interest encompasses approximately 74 square miles bounded on the south by the ridgeline of South Mountain and on the north by the ridge line of Sulphur Mountain between Santa Paula and the Upper Ojai area. On the west, the Area of Interest boundary is between Wheeler Canyon and Aliso Canyon. To the east, the Area of Interest boundary is Hall Road near the Sycamore Tree Monument.
2. The Sphere of Interest, as adopted by Ventura County LAFCo on February 21, 2018, which includes a provision that the territory is likely to be developed within 5 years and has been designated for non-agricultural or open space use by applicable general and specific plans.²
3. The Santa Paula City Urban Restriction Boundary (CURB), as adopted by the voters.
4. The current City Limits, as adopted by Ventura County LAFCo, in accordance with the California *Government Code*.

3.3 Project Objectives

The following objectives have been established for the 2040 General Plan Update and will aid the public and decision-makers in their review of the proposed Plan and associated environmental impacts:

- Establish a long-range vision to the 2040 General Plan horizon year that reflects the desires of the community as expressed in the 2050 SAVE OPEN-SPACE and AGRICULTURAL RESOURCES (SOAR) Land Use Measure approved by the voters on November 8, 2016;
- Adopt policies to guide City decisions regarding private land use and development and City infrastructure plans consistent with the regional population, housing and jobs forecast assumed in the 2040 Regional Transportation Plan/Sustainable Communities Strategy;
- Preserve Santa Paula's small-town character and compact neighborhoods;
- Promote the maintenance and enhancement of existing neighborhoods;

1 Pursuant to CEQA Guidelines §15125 an EIR must address conditions as they exist at the time the NOP is published (November 8, 2017). However, on February 21, 2018 Ventura LAFCo adopted a substantial change to the Santa Paula SOI. Because the SOI is a major component of the Land Use Plan, this EIR utilizes the SOI as established by LAFCo on February 21, 2018 rather than the prior SOI as it existed on the NOP publication date.

2 Ventura LAFCo Commissioner's Handbook, Section 4.3.2.1, p. 53, 2016



- Enhance the economic vitality and attractiveness of Downtown;
- Encourage land use and development patterns that preserve the character of the community, protect historic, cultural and environmental resources, minimize public safety hazards, promote healthy lifestyles and environmental justice, and expand economic opportunity for local residents and businesses;
- Encourage a full range of living options for residents of all ages and income levels, including urban townhouses and condominiums, rental apartments, move-up executive homes, senior and assisted living facilities, and accessory units;
- Enhance the City's fiscal sustainability through higher property values, increased tourism and sales tax revenues, and the efficient use of land and infrastructure;
- Promote environmental sustainability and the City's capacity to adapt successfully to climate change and other uncertainties; and
- Provide guidance for detailed plans and implementing actions, such as specific plans, the Development Code, subdivision regulations, design standards, capital improvement programs and City departmental procedures.

3.4 Project Characteristics

The proposed 2040 General Plan is a comprehensive statement of Santa Paula's goals and priorities for land use, development and other City responsibilities for the next two decades. The General Plan serves as a guide for land use and development regulations, capital improvement programs, and related City decisions. The following discussion describes the organization of the General Plan and the proposed 2040 land use plan and circulation network.

As the City's highest-order planning document, the General Plan establishes the regulatory framework for development. The Land Use Element is the primary document guiding the physical structure of the community. **Section 3.4-2** below describes the proposed Land Use Plan while **Section 3.4-3** describes the proposed circulation network. Other General Plan elements provide policies that shape development to achieve the City's goals, such as public safety, adequate public facilities and services, economic opportunity, etc. The proposed policies and programs contained in each of the General Plan elements are described in the relevant sections of **Chapter 4**.



3.4-1 General Plan Organization

Table 3.4-1 shows how the proposed 2040 General Plan elements correspond to the elements required under State law. The Housing Element was last updated in 2013 and is not part of the Proposed Project. Under current State law the next update to the Housing Element is scheduled for 2021.

Table 3.4-1 Required and Proposed General Plan Elements

Required Elements ¹	Proposed Santa Paula 2040 General Plan Elements
Land Use	Land Use
Circulation	Circulation and Mobility
Housing ²	Housing ²
Conservation	Environmental and Cultural Resources
Open Space	
Noise	Hazards and Public Safety
Safety	
Optional Elements	Public Services and Utilities
	Economic Development and Downtown

¹ California Government Code §65300 et seq.

² The Housing Element was last updated in 2013 and is not included in this General Plan update.

The scope and content of the proposed 2040 General Plan elements are summarized below:

- The **Introduction** (Chapter 1) provides an overview of the purpose, requirements and organization of the General Plan.
- The **Land Use Element** (Chapter 2) represents a generalized “blueprint” for the future of Santa Paula and is the core of the General Plan. It sets forth the preferred pattern for the use, development, and preservation of land within the City’s planning area based on community preferences and describes the anticipated level of growth to the 2040 horizon year. It also identifies the type, location, and intensity of new commercial and industrial uses to meet the community’s economic needs. The issue of **environmental justice** is also addressed in the Land Use Element.
- The **Circulation and Mobility Element** (Chapter 3) addresses the community’s needs and desires related to mobility, including streets and highways, transit, and non-motorized modes such as bicycle trails and pedestrian facilities. Proposed circulation system improvements are identified based upon projected growth for the planning period and the City’s mobility goals.



- The **Environmental and Cultural Resources Element** (Chapter 4) includes policies and programs related to agriculture, air quality and greenhouse gas emissions, biological resources, cultural and historic resources, mineral and petroleum resources, open space and scenic resources, and water quality. This element addresses the requirements for the Conservation and Open Space Elements under State planning law.
- The **Hazards and Public Safety Element** (Chapter 5) deals with potential hazards related to geologic conditions, flooding, wildland fire, hazardous materials, aviation, and noise. This element addresses the requirements for the Safety Element and Noise Element under State planning law.
- The **Public Services and Utilities Element** (Chapter 6) addresses the topics of police and fire protection, emergency response, education, library services, parks and recreation, water supply, wastewater treatment, solid waste disposal and energy production and transmission.
- The **Economic Development and Downtown Element** (Chapter 7) includes policies and programs intended to enhance the City's fiscal sustainability, economic prosperity, and revitalization of the Downtown.

3.4-2 Proposed Land Use Plan

Santa Paula is a mature community and its land use patterns have been stable for many years. **Table 3.4-2** summarizes the proposed land use categories in the 2040 General Plan, while the general locations of these categories are shown in the proposed Land Use Map (**Exhibit 3.4-1**). **Table 3.4-3** summarizes the proposed changes to existing General Plan land use categories and the City's rationale for the change.

The 2040 Land Use Map also proposes changes to the existing land use designations for specific properties. The proposed changes are the result of Community Development Department analysis, property owner requests, and comments from the public and City decision-makers. These changes are intended to reconcile inconsistencies between existing General Plan land use designations, zoning designations and existing uses, and to better reflect market conditions in the foreseeable future. Proposed changes to the land use designations for specific properties are summarized in **Table 3.4-2** while the locations of these properties are shown in **Exhibit 3.4-2**.

3. Project Description
3.4 – Project Characteristics



Table 3.4-2 Proposed 2040 General Plan Land Use Categories

Category	Principal Uses	Density/Intensity*
Open Space / Passive	Natural land, creeks, barrancas, rivers. Incidental residential uses are also allowed on a conditional basis for large lots. Surface mining is conditionally permissible subject to the provisions of the Municipal Code.	Limited development allowed. Maximum 0.1 FAR
Open Space/ Parks and Recreation	Natural land, landscaped open areas, developed parks and recreational uses. Park and recreation/sport-related development allowed. Incidental residential uses are also allowed on a conditional basis for large lots. Surface mining is conditionally permissible subject to the provisions of the Municipal Code.	Maximum 0.1 FAR
Agriculture	Land for crops, limited livestock production, limited agriculture, incidental and supportive agricultural uses, structures and storage.	One single-family dwelling allowed per agricultural parcel. Minimum parcel size: 20 acres. 0.05 unit per acre maximum (0.2 persons/acre)
Residential - Hillside	Single-family residential and accessory uses.	3 units/ acre maximum (10 persons/acre) Planned development clustering is allowed.
Residential – Single-Family	Single-family residential and accessory uses.	4-7 units/acre (13-23 persons/acre). Planned development clustering is allowed.
Residential - Medium Density	Single-family and multi-family residential with accessory uses.	8-15 units/acre (27-50 persons/acre)
Residential – Medium-High Density	Single-family and multi-family residential with accessory uses.	16-21 units/acre (53-70 persons/acre)
Residential - High Density	Single-family and multi-family residential with accessory uses.	22-29 units/acre (73-97 persons/acre)
Mobile Home Park	Mobile home parks	10 units/acre maximum (33 persons/acre). Minimum parcel size: 10 acres
Mixed Use: Office/Residential	Commercial and multi-family residential uses.	Maximum non-residential FAR: 0.5 Maximum residential density: 29 units/acre (97 persons/acre)
Mixed Use: Commercial/Light Industrial	Uses are allowed to mix to reflect the heavy commercial character of East Main Street.	Maximum non-residential FAR: 0.35 Maximum residential density: 21 units/acre (70 persons/acre)
Central Business	Primary intended uses include retail shops and restaurants on the ground floor facing the street, with other business or residential uses permitted in the remaining ground floor areas and the upper floors.	Maximum non-residential FAR: 3.0 No maximum residential density
Commercial - Neighborhood	Convenience shopping and personal services. Live/work studios are also permissible.	Maximum non-residential FAR: 0.25 Maximum residential density: 1 unit per business occupancy



Category	Principal Uses	Density/Intensity*
Commercial - Office	Professional offices, banks, medical clinics. Mixed-use commercial/residential and stand-alone multi-family residential development is also permissible.	Maximum non-residential FAR: 0.50 Maximum residential density: 29 units/ acre (97 persons/acre).
Commercial - General	Retail and services for the entire city, auto sales, and other highway-oriented commercial uses. Mixed-use commercial/residential and stand-alone multi-family residential is also permissible.	Maximum non-residential FAR: 0.35 Maximum residential density: 29 units/acre (97 persons/acre).
Industrial Park	Administrative and production uses; research and development uses; and supporting commerce and production uses.	Maximum FAR: 0.25
Industrial - Light	Administrative headquarters, other commerce and manufacturing.	Maximum FAR: 0.35
Industrial - General	General industrial, custom manufacturing, assembling, compounding, neighborhood commercial uses.	Maximum FAR: 0.35
Institutional/Civic	Hospitals, community centers, government offices, cemeteries, public service facilities.	Maximum FAR for institutional and civic uses ranges from 0.35 to 1.0 depending on location as determined by the Development Code.
Airport	Airport operations.	Maximum building coverage is 50% for buildable sites. No maximum FAR.
Specific Plans	Determined by adopted Specific Plans.	Determined by adopted Specific Plans.
Expansion Areas	As specified in the Land Use Element.	As specified in the Land Use Element.
Land Use Overlays	Determined by the underlying use category, the General Plan text and figures, and the Development Code.	Determined by the underlying use category, the General Plan text and figures, and the Development Code.

*Population density assumes an average of 3.34 persons per household, as reported by the US Census Bureau for Santa Paula (2012-2016 ACS Table S1101). Population density figures for each residential land use category are estimates and are not intended to be used a regulatory cap. Residential densities are units per gross acre.

Note: This table provides a brief summary of each land use category. Please refer to the text for a more complete description.

3. Project Description
3.4 – Project Characteristics

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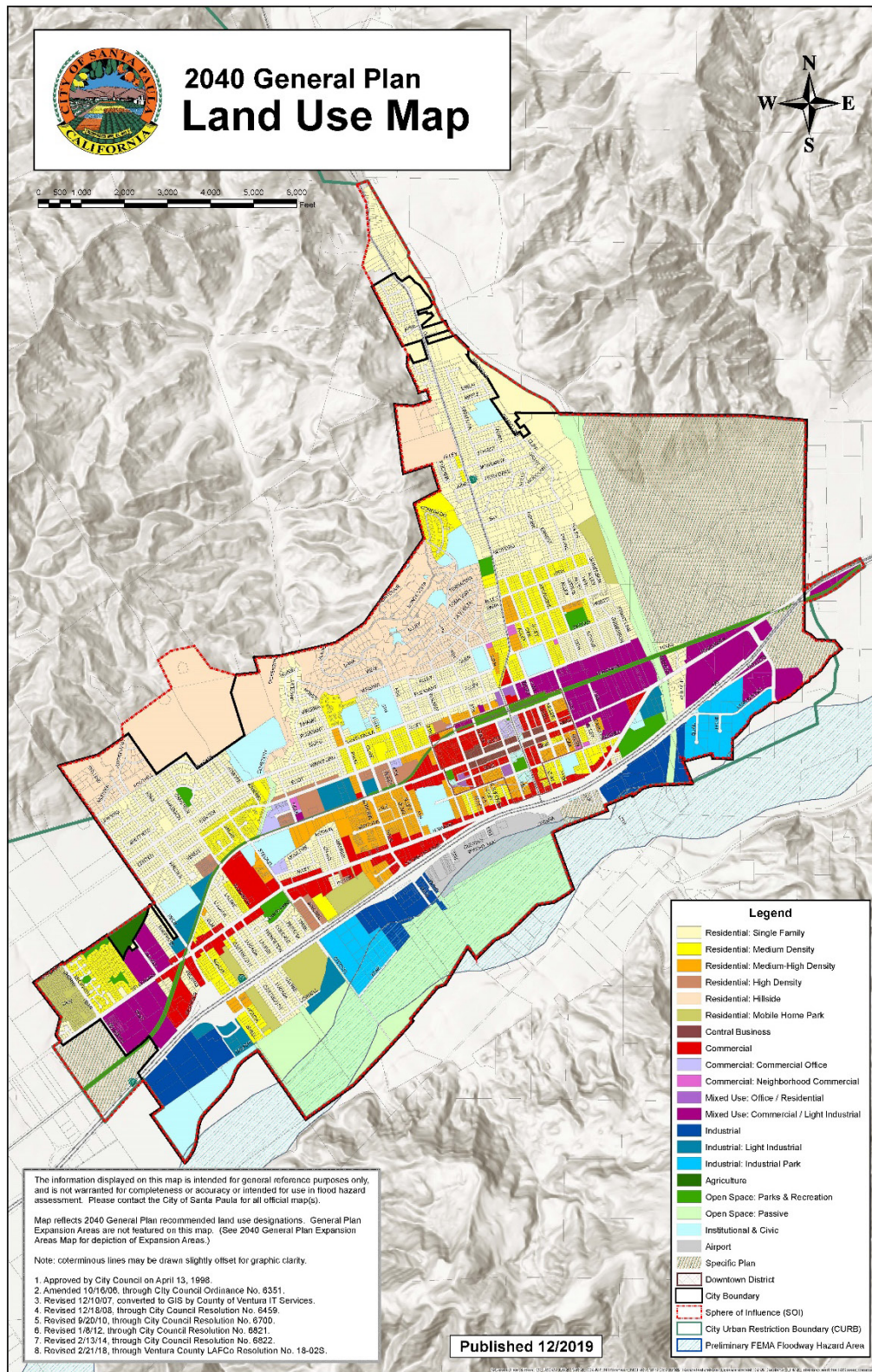


Exhibit 3.4-1 Proposed 2040 Land Use Map



Table 3.4-3 Proposed Changes to Existing Land Use Categories

Existing Land Use Category	Proposed Land Use Category	Proposed Changes
Open Space – Passive and Golf Course	Open Space – Passive	“Golf course” has been removed to reconcile this category with zoning regulations for the “O” district where golf course is not a permitted use. Surface mining added as a conditional use consistent with the Development Code.
Open Space – Parks and Recreation	Open Space – Parks and Recreation	Surface mining added as a conditional use consistent with the Development Code.
Agriculture	Agriculture	No change proposed
Hillside Estate Residential	This category deleted	This category is not currently applied to any land.
Hillside Residential	Residential - Hillside	No change proposed
Residential Canyon	This category deleted	This category is not currently applied to any land.
Single Family Residential	Residential – Single-Family	No change proposed
Medium Density Residential	Residential - Medium Density	No change proposed
Medium-High Density Residential	Residential - Medium-High Density	No change proposed
High Density Residential	Residential - High Density	No change proposed
Mobile Home Park	Mobile Home Park	No change proposed
Mixed Use: Office/Residential	Mixed Use: Office/Residential	Allowable residential density increased to R4 standards (29 du/acre)
Mixed Use: Commercial/Light Industrial	Mixed Use: Commercial/Light Industrial	Revised to allow mixed residential/commercial or stand-alone residential use at up to 21 du/acre consistent with the Housing Opportunities Overlay (SPMC Chapter 16.35)
Neighborhood Commercial	Commercial - Neighborhood.	Revise to allow live/work residential use. This change would better align with the allowable land uses in the Commercial-Neighborhood (C-N) zoning district, which allows live/work.
Commercial Office (portion)	Central Business (new)	The area proposed to be designated Central Business is currently designated Commercial Office. The Central Business land use category would coincide with the Central Business District zoning designation. Primary intended uses include retail shops and restaurants on the ground floor facing the street, with other business or residential uses permitted in the remaining ground floor areas and the upper floors. Proposed maximum non-residential FAR is 3.0 with no maximum residential density in order to incentivize infill housing. The current maximum FAR in the CBD zoning district is 2.0.
Commercial Office	Commercial - Office	Revised to allow mixed-use commercial/residential and stand-alone multi-family residential at R4 standards (29 du/acre) consistent with the Commercial-Office zoning district.

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3.4 – Project Characteristics



Existing Land Use Category	Proposed Land Use Category	Proposed Changes
Commercial	Commercial - General	Revised to allow mixed-use commercial/residential and stand-alone multi-family residential at R4 standards (29 du/acre) consistent with the General Commercial zoning district.
Industrial Park	Industrial Park	No change proposed
Light Industrial	Industrial - Light	Proposed FAR increase from 0.30 to 0.35 consistent with the Light Industrial zoning district.
Industrial	Industrial - General	Name change only
Airport Operational	Airport	Name change to reflect the fact that with the deletion of the Airport Related category only one category of airport use is necessary.
Airport Related	This category deleted	This category is not currently applied to any land.
Institutional/Civic	Institutional/Civic	No change proposed
Overlays and Special Study Areas		
Downtown Improvement Overlay (not shown on the current Land Use Map)	Downtown District Overlay	The area proposed to be designated <i>Downtown District Overlay</i> coincides with the approximate boundaries for the downtown improvement area identified in broadly supported past visioning efforts. The intent of the overlay is to provide voluntary incentives for compatible infill development and adaptive re-use of existing buildings. The Downtown District Overlay land use category would be implemented by Development Code regulations with enhanced provisions for pedestrian-scaled uses (sidewalk-oriented residential and commercial, pedestrian connectivity, shared parking, etc.), Development intensity bonuses would be available for covenant-based affordable housing or other public benefits. Proposed maximum non-residential FAR is 3.0 with no maximum residential density.
Downtown Historical District Overlay (not shown on the current Land Use Map)	The Historic Overlay applies to the historic residential district centered on the 600-900 block of Santa Paula Street north of the Downtown area. The Historic Overlay is implemented by the City's Historic Landmark Overlay District (Municipal Code Chapter 16.33), which incorporates special development and design review standards as described in Municipal Sec. 17.55.170 and Appendix A of Ordinance 816. The boundaries of the Historic Overlay are shown on the Zoning Map, not the General Plan Land Use Map.	No change proposed.
Mining Resource Overlay (not shown on the current Land Use Map)	This overlay deleted	An overlay is unnecessary. Mineral resource areas are shown in Figure 4-6 of the Environmental and Cultural Resources Element.



Existing Land Use Category	Proposed Land Use Category	Proposed Changes
Special Study Areas (not shown on the current Land Use Map) are identified: Downtown Design Development/Improvement Plan Area, Harvard Boulevard Corridor, Southeast Neighborhood, Railroad Corridor, City entrances, and Floodway areas.	Three Special Study Areas are designated: the Harvard Boulevard Corridor, the Railroad Corridor, and City Entrances/Gateways. The Southeast Neighborhood and Floodway Special Study Areas are proposed to be deleted.	New policies for the Downtown have been added in the Land Use Element and the Economic Development and Downtown Element. No policies specific to the Southeast Neighborhood are identified in the current Land Use Element; therefore, this designation is unnecessary. Flood hazard areas are shown in the Hazards and Public Safety Element (Fig. 5-3) and policies are included to address those areas.
Specific Plans and Expansion Areas		
East Area 1 Specific Plan (SP-3)	East Area 1 Specific Plan (SP-3)	Description and statistics updated to reflect the current Specific Plan
East Gateway Specific Plan (SP-4)	East Gateway Specific Plan (SP-4)	No changes proposed
East Area 2 Planning Area	East Area 3 Expansion Area	Change in nomenclature only. The East Area 2 Planning Area has been deleted and replaced with the new East Area 3 Expansion Area, which refers to the remainder portion of the East Area 2 Planning Area after the annexation of the East Gateway Specific Plan area.
West Area 2 Expansion Area	West Area 2 Expansion Area and Santa Paula West Business Park Specific Plan (SP-6)	Description and statistics updated to reflect current circumstances, including the adoption of Santa Paula West Business Park Specific Plan (SP-6), a portion of the West Area 2 Expansion Area.
South Mountain Expansion Area	South Mountain Expansion Area	No changes proposed

Notes:

Population density standards are required by State law and have been added to each land use designation that allows residential use. Density standards have been determined based on the allowable residential density (units/acre) and the city's average household size based on the latest U.S. Census ACS estimate. These standards are for reference only and are not intended to regulate occupancy or household size.



Table 3.4-4 Proposed Parcel-Specific Changes to Existing Land Use Designations

Address	APN	Existing General Plan Designation	Proposed General Plan Designation	Rationale
1102 E. Main Street	101022315	Open Space: Parks & Recreation	Commercial	Inconsistency between the General Plan and Zoning. This 0.38-acre parcel has a GP land use designation “Open Space” but has a Commercial General zoning. Since 1988 the site has been a used car lot. Staff did not identify any prior plans for this site to become a midtown pocket park downtown and suspects that this GP designation is in error. Staff recommends changing the General Plan land use designation to “Commercial” from “Open Space Parks & Recreation”.
17902 E. Telegraph Road	107003001	Mixed Use: Commercial/Light Industrial	Industrial	Create a more suitable match between the General Plan and Zoning. This property was part of the larger 2013 annexation for the East Area 1 and 2 projects. This 0.93-acre site received a zone change to “Light Industrial” in July 2017 per CC Ord. 1269. Changing the GP land use designation to “Industrial” would align with the adjacent properties.
Vista Del Rio 62-Acre Property	104017033	Open Space: Passive Golf Course	Light Industrial	Inconsistency between the General Plan and Zoning. This 62-acre parcel begins at the edge of the mobile park and extends southward, with the vast majority of the parcel within the Santa Clara river bottom and floodplain. The entire parcel has a General Plan land use designation of “Open Space Parks & Recreation”. However, the parcel has split-zoning. The northern portion is irregularly shaped, partially within the Airport Outer Safety Zone, about 9.3-acres, and is Zoned “Light Industrial” (LI), while the remaining 52.7-acres is Zoned “Open Space – Passive” (O). Split-Zoning is a common feature shared by many parcels abutting the Santa Clara River. The problem is the northern portion’s LI zoning does not correlate with the overall parcel’s General Plan land use designation of “Open Space Parks & Recreation”. The proposed solution is to change the northern portion’s GP land use designation to Industrial to correlate with the current LI zoning. Note: The split-zone boundary is an imaginary straight line based on the 1998 FEMA public levee and bank protection line. This FEMA line has been significantly revised since 1998 and might no longer be represented as a straight line. The City is awaiting the release of FEMAs’ updated public levee and bank protection line, anticipated summer 2019.
Eastern Triangle (Ferris/Whipple/Texas Area)		Mixed Use: Commercial/Light Industrial	Residential: Single Family	The “Eastern Triangle” refers to lands annexed in 2013 as part of the East Area 1 and 2 projects. This cluster of properties form a triangular shape wedge extending from Santa Paula Creek and is sandwiched between EA1 to the north and Highway 126 to the south, with the tip just west of Hallock Road. The entire Eastern Triangle has a General Plan land use designation of “Mixed Use Commercial / Light Industrial” and is Zoned “Commercial Highway” (C-H). Along the eastern side of the creek are a collection of about 30 properties that were included in the 2013 annexation. All of these properties consist of legal, nonconforming
(no address) 17919 Texas Ln Ferris Dr Ferris Rd 17939 Texas Ln	107003034 107017013 107017007 107017008 107017014			



Address	APN	Existing General Plan Designation	Proposed General Plan Designation	Rationale
17961 Texas Ln	107017015			structures as they were developed according to Ventura County standards. Due the quantity of properties, varying lot sizes and odd dimensions, this enclave of homes seems unlikely to be transformed into highway commercial uses. Staff suggests changing the General Plan land use designation to “Residential – Single Family” and the Zoning district to “Small Lot Single Family Residential”[R-1(a)] to accommodate this existing cluster of residences. Per the SPMC, R-1(a) zoning districts have lot sizes less than 6,000-sf, and a maximum density of 7 du/acre. The R-1(a) designation would accommodate the several residential properties that are less than 6,000-sf. Lastly, in R-1(a) Zones, most business uses are prohibited, excepting daycares, mobile home parks, and schools all of which would require a CUP. Note: There are five business uses near the Ferris/Whipple/Texas area, all clustered at 17591 Telegraph Road (Luis Herrera, Battery Main Co, Superior Masonry, S&S Salt Distributors, and Irma’s Flowers) APN 107-0-020-275. This 1.8-acre property is excluded from the proposed Ferris/Whipple/Texas areas described above, and would retain the existing GP land use and Zoning, thereby remaining available for commercial development.
458 Ferris Dr	107017010			
131 Ferris Dr	107002012			
71 Ferris Dr	107002009			
121 Ferris Dr	107002011			
101 Ferris Dr	107002010			
65 Ferris Dr	107002008			
29 Ferris Dr	107002007			
17963 Telegraph Rd	107002006			
17959 E Telegraph Rd	107002005			
130 Ferris Dr	107002013			
17983 Ferris Ln	107002014			
17989 Ferris Dr	107002015			
17991 Ferris Dr	107002016			
60 Ferris Dr	107002025			
59 Whipple Rd	107003013			
(no address)	107003052			
17950 E Telegraph Rd	107003048			
(no address)	107003032			
17930 E Telegraph Rd	107003011			
17915 Texas Ln	107017017			
131 Whipple Rd	107003046			
(no address)	107003010			
(no address)	107003031			
17958 Telegraph Rd	107003033			
29 E Whipple Rd	107003007			
17962 E Telegraph Rd	107003004			
(no address)	107003015			
(no address)	107003038			
Unknown Ln	107003053			
17948 E Telegraph Rd	107003009			
25 E Whipple Rd	107003006			
17944 E Telegraph Rd	107003012			
103 Whipple Rd	107003016			
97 Whipple Rd	107003014			



Address	APN	Existing General Plan Designation	Proposed General Plan Designation	Rationale
(no address) 17983 Telegraph Rd 8 Ferris Dr 18021 E Telegraph Rd 48 Ferris Dr 17988 Ferris Dr 17980 Ferris Ln 17958 E Telegraph Rd 17998 E Telegraph Rd 17926 E Telegraph Rd	107003021 107002033 107002020 107002034 107002024 107002017 107002018 107003003 107003005 107003028			
41-42 Palm Court (SPHS)	100015406 100015416	Residential: Single Family	Institutional/Civic	These two properties are owned by the SPUSD. These two lots were previously occupied by single-family residences, but have been demolished to create additional parking for Santa Paula High School. The proposed General Plan land use designation changes are in accord with the School District's Facilities Long- Range Master Plan.
Mill Street (Harvard Blvd. to Ventura St. (near City Hall))		Mixed Use: Office/Residential	Residential: Medium-High Density	This cluster of 10 properties is mostly multi-family residential and a few single-family residential. Currently the smallest 4 of the 10 lots are considered legal, nonconforming because they fail to meet the density standards for residential development in "Commercial Office" (C-O) zoning district. Staff infers that the 1998 General Plan envisioned this portion of Mill Street as a commercial connector between Harvard Boulevard and Main Street. Since 1998 new commercial office development has been absent. Staff anticipates that this cluster is likely to remain residential. Note: The challenge is finding a suitable Zoning district that works with the various property dimensions. If the Zoning were changed to R-2, per the SPMC, R-2 lots have a minimum lot size of 6,000-sf, and a minimum width of 60-ft. Six of the ten properties have both adequate lot size and frontage width. However, the remaining four of the ten lots are less than 6,000-sf, and, these same four lots are only about 40- to 50-ft wide. Changing these four smaller lots to R-1 Zoning would resolve the size issues, but creates another problem of a discontinuous mosaic of Zoning districts within a single residential block. The best solution appears to be changing the properties to R-2 Zoning, and the four small lots would remain as legal, nonconforming uses, just as under the current Zoning.
226 S Mill St 928 E Ventura St 208 S Mill St 220 Mill St 224 S Mill St 212 S Mill St 234 S Mill St 230 S Mill 228 S Mill St 242 S Mill St	103024112 103024107 103024108 103024110 103024111 103024109 103024164 103024163 103024113 103024115			



Address	APN	Existing General Plan Designation	Proposed General Plan Designation	Rationale
Ojai Street (Between Harvard Blvd. and Ventura St.)		Mixed Use: Office/Residential	Residential: Medium Density	This is a cluster of nine lots, all hosting single family residences, with a General Plan land use designation of “Mixed Use: Office / Residential”. Currently all nine properties are considered legal, nonconforming because they fail to meet the density standards for residential development in Commercial Office” (C-O) zoning districts. Staff infers that the 1998 General Plan envisioned this portion of Mill Street as an office-type commercial buffer zone transitioning from the 10th Street commercial corridor to the adjacent Medium Density Residential neighborhood east of S. Ojai Street. However, since 1998 new commercial office development has been absent. Staff anticipates that this cluster is likely to remain residential. Note: The challenge is finding a suitable Zoning district that works with the various property dimensions. If the Zoning were changed to R-2, per the SPMC, R-2 lots have a minimum lot size of 6,000-sf, and a minimum width of 60-ft. Only three of the nine properties have both adequate lot size and frontage width. Of the remaining six of the ten lots, all six have a width of about 40- to 50-ft wide, and three these six properties are less than 6,000-sf in area. The best solution appears to be changing the properties to R-2 Zoning, and the six referenced lots would remain as legal, nonconforming uses, just as under the current Zoning.
214 S Ojai St	101027106			
224 S Ojai St	101027107			
210 S Ojai St	101027105			
1020 Ventura St	101027104			
1012 E Ventura St	101027103			
234 S Ojai St	101027110			
238 S Ojai St	101027111			
242 S Ojai St	101027112			
230 S Ojai St	101027109			
New Street (Between Ojai St. and Oak St.)		Mixed Use: Office/Residential	Residential: Medium Density	This is a cluster of eleven lots, all hosting single family residences, with a General Plan land use designation of “Mixed Use: Office / Residential”. Staff infers that the 1998 General Plan envisioned this portion of New Street as a commercial buffer zone transitioning from the Main Street commercial corridor to the adjacent residential neighborhood south of New Street. However, since 1998 new commercial office development has been absent. Staff anticipates that this cluster is likely to remain residential. Note: The challenge is finding a suitable Zoning district that works with the various property dimensions. If the Zoning were changed to R-2 or R-3, per the SPMC R-2 and R-3 lots have a minimum lot size of 6,000-sf, and a minimum width of 60-ft. Only one of the 11 properties has adequate lot size. The remaining ten of the eleven lots are less than 6,000-sf in area. The best solution may be to change the properties to an R-1(a) Zoning which would permit the existing single family residences to be repaired, maintained, and expanded. Alternately, both the General Plan land use designation and Zoning district could remain ‘as-is’ and thus all eleven properties would maintain their legal, nonconforming status.
1111 New St	101022309			
118 S Oak St	101022305			
1117 New St	101022308			
114 S Oak St	101022304			
122 Oak St	101022306			
1121 New St	101022307			
115 S 11th St	101022311			
(no address)	101022310			
120 S Eleventh St	101021311			
116 S 11th St	101021301			
1071-1073 New St	101021312			



Address	APN	Existing General Plan Designation	Proposed General Plan Designation	Rationale
255 N. Ojai Street & Vacant Lot	1010163055 1010163065	Mixed Use: Office/Residential	Mixed Use: Commercial/Light Industrial	These are two properties, one with a legal, nonconforming single-family residence and the other a vacant lot, with a General Plan land use designation of “Mixed Use: Office / Residential”. The remainder of the block is single 2.12-acre parcel hosting a former Packing House warehouse with a General Plan land use designation of “Mixed Use: Commercial / Light Industrial”. The two 0.17-acre properties should have both the General Plan land use and Zoning changed in order to unite the entire block with a common General Plan land use designation of “Mixed Use: Commercial / Light Industrial”, and, a “Commercial / Light Industrial (C/LI)” Zoning to facilitate development expansion and modernization of former Packing House site.
Main Street (From Palm Ave. to 4th St.)		Commercial	Residential: Medium-High Density	This is a cluster of 14 lots, hosting single family residences and three businesses, with a General Plan land use designation of “Commercial”. Staff infers that the 1998 General Plan envisioned this portion of Main Street as a commercial corridor, similar to the commercial areas along Main Street to the east, towards the Downtown. However, since 1998 new commercial development has been minimal. Staff anticipates that this cluster is likely to remain predominately residential. Note: The challenge is finding a suitable Zoning district that works with the various property dimensions. The remainder of the blocks to the south are Zoned R-3. If these 14 properties’ Zoning were changed to R-3, per the SPMC R-3 lots have a minimum lot size of 6,000-sf, and a minimum width of 60-ft. Eleven of the 14 properties have adequate lot size. The remaining three of the 14 lots are less than 6,000-sf in area. The best solution may be to change the properties to R-3 Zoning, and the three referenced lots would remain as legal, nonconforming uses.
224 E Main St	103021237			
304 E Main St	103021242			
112 Olive St	103021202			
220 E Main St	103021236			
302 E Main St	103021240			
228 E Main St	103021239			
226 E Main St	103021238			
106 S Olive St	103021243			
216 E Main St	103021235			
322 E Main St	103021145			
328 E Main St	103021146			
318 E Main St	103021144			
404 E Main St	103021154			
402 E Main St	103021147			
Main Street (East of Elementary School to 120 Main St.)		Mixed Use: Office/Residential	Residential: Medium-High Density	This is a cluster of 11 lots with a General Plan land use designation of “Mixed Use: Office / Residential”. The lots currently have a mixture of residential-type uses: several large lots with older homes; a senior housing complex; a senior apartment complex (SPHA); and a few narrow lots with single family residences. There are two home-based businesses in two separate residential units, a hairdresser (Santa Paula Hair Dressers), and law office (Sullivan and Sullivan). While the large lots could accommodate development as a commercial office type, since 1998 new commercial office development has been absent. Staff suggests changing the General Plan land use designation to “Residential Medium High Density” and the Zoning to “Residential Medium High Density (R-3)”. All of the properties are larger than
134 W Main St	105012125			
246 W Main St	105013203			
220 W Main St	105012118			
230 W Main St	105013204			
200 W Main St	105012150			
250 W Main St	105013202			



Address	APN	Existing General Plan Designation	Proposed General Plan Designation	Rationale
130 W Main St 126 W Main St 138 W Main St 110 W Main St 120 W Main St	105012126 105012130 105012122 105008008 105012131			the 6,000-sf minimum for R-3 Zones. These General Plan land use and Zoning changes would bring the properties into alignment with the south adjacent neighborhood.
South 13th St. Cul-de-Sac		Commercial	Residential: Single Family	The southern cluster of 8 properties along the S. 13th Street cul-de-sac are all developed with single-family residences and have a General Plan land use designation of “Commercial”. Staff forecasts that these properties are unlikely to convert to any viable Commercial land use due to small lot sizes, and, the existence of single-family homes (developed around the 1950-60s, before the SR 126 highway was built). Staff suggests changing the General Plan land use designation to a Residential-type designation, and Zoning to one of three options: R-1(a), R-1, or R-2. Selecting R-1(a) may be the most appropriate given the lots sizes are less than 6,000-sf. Note: The small, triangular pair of lots at 1300 Harvard Boulevard, near the entrance to S. 13th Street cul-de-sac, should retain both the General Plan land use designation and Zoning of “Commercial”. Similarly, the wedge-shaped property at 1250 Harvard Boulevard should retain its General Plan land use designation and Zoning of “Commercial”.
230 S 13th St 229 S 13th St 241 S Thirteenth St 231 S 13th St 235 S Thirteenth St 238 S 13th St 234 S Thirteenth St Harvard Bl	101028501 101028402 101028406 101028403 101028404 101028507 101028502 101028504			
M-1 Airport Parcels		Industrial	Airport	These are two clusters of single-family homes along cul-de-sacs: 6 properties at the S. 5th Street, and 9 properties at S. 8th Street. These homes were built around the 1940-50s, have an Industrial GP land use designation, and are Zoned M-1. All of these 15 properties are considered legal, nonconforming as residential uses are prohibited in M-1 Zones. Staff suggests changing the Industrial GP land use designation to Airport, to align with the surrounding area. M-1 is proposed to be eliminated citywide as a Zoning designation, and as such, staff suggests assigning K-O (Airport Operational) zoning to the former M-1 parcels, to align with the surrounding K-O zoning designations.
740 E Santa Maria St 331 S Eighth St 335 S Eighth St 339 S Eighth St 343 S Eighth St 334 S Eighth St 760 E Santa Maria St 326 S Eighth St 340 S Eighth St 330 S Eighth St 325 S Eighth St 720 Santa Maria St 704 E Santa Maria St 650 E Santa Maria St 411 S Fifth St 405 S Fifth St 401 S Fifth St	104008065 104009106 104009107 104009120 104009121 104008010 104008064 104008056 104008011 104008009 104009118 104008063 104008059 104008049 104008035 104008034 104008033			



Address	APN	Existing General Plan Designation	Proposed General Plan Designation	Rationale
413 S Fifth St 406 S Fifth St 400 S Fifth St	104008036 104023033 104023034			

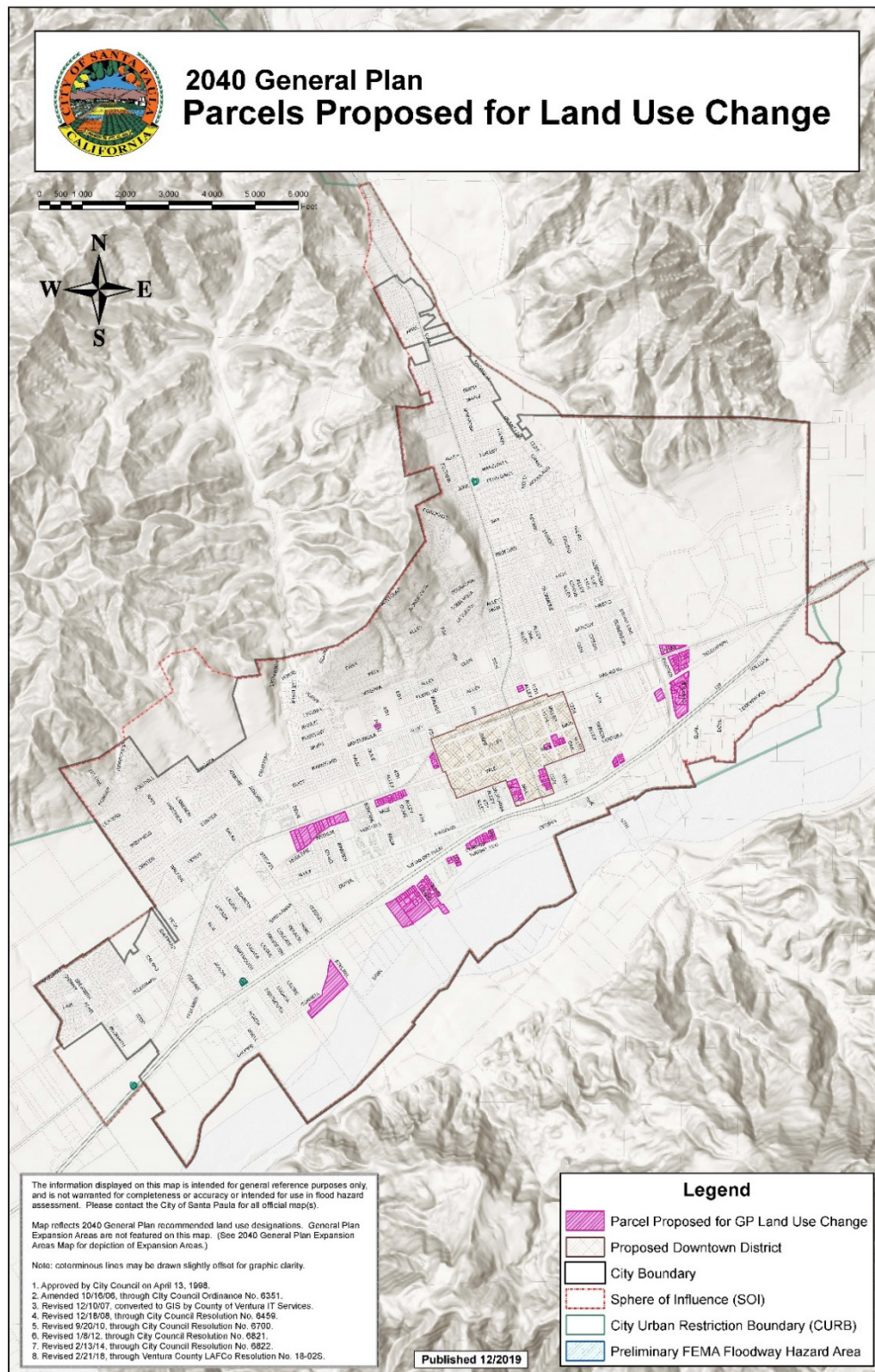


Exhibit 3.4-2 Locations of Proposed Parcel-Specific Changes to Existing Land Use Designations



3.4-3 Proposed Circulation Network

The proposed 2040 General Plan roadway circulation network is shown in **Exhibit 3.4-3**. Proposed changes to this network are summarized in **Table 3.4-5** and are intended to better align the City's proposed Land Use Plan with State and regional mobility plans and policies such as Complete Streets and the SCAG 2016-2040 RTP/SCS. Proposed changes to other components of the circulation system, including transit, bicycle and pedestrian facilities and goods movement are discussed in **Section 4.17**.

3.4-4 Anticipated Level of Development Under the 2040 General Plan

Analytical Approach

Although the General Plan establishes the City's desired pattern for growth, the location and timing of private development will be determined by the individual decisions of property owners and developers. Land use and zoning designations create development opportunities; however, individual development decisions are affected by a variety of factors including national and global economic conditions, business cycles, financial expectations, lending policies, interest rates, changing regulations, and subjective personal views. The collective effect of these individual decisions is that some properties may sit vacant or underutilized for many years while the demand for other types of property could exceed the supply, which may lead to proposals to amend land use designations.

The concept of *buildout* is sometimes used to evaluate the environmental impacts of General Plans. However, because of the unpredictable nature of development decisions as described above, the City's approach in preparing this Program EIR is to benchmark the analysis to adopted State and regional growth policies. This approach is considered to be more realistic and appropriate for environmental analysis of the 2040 General Plan than a mathematical calculation of theoretical buildout capacity³ and is also consistent with CEQA (*Public Resources Code* §§21000-21189) and the CEQA Guidelines (*California Code of Regulations*, Title 14, Division 6, Chapter 3, §§15000-15387).

3 As an example, the Final EIR adopted for the 1998 Santa Paula General Plan Update assumed a population of 37,920 and employment of 17,390 in 2020 based on the calculated buildout capacity of adopted land uses. The California Department of Finance estimated the 2018 population of Santa Paula as 31,138 and according to SCAG the projected 2020 population is 32,068. Therefore, the 1998 General Plan EIR overestimated the city's 2020 population by approximately 18%. The overestimation of employment was even greater – the 1998 General Plan EIR estimated 2020 employment as 17,390 while SCAG's projected 2020 employment is 8,458, an overestimation of about 106%.

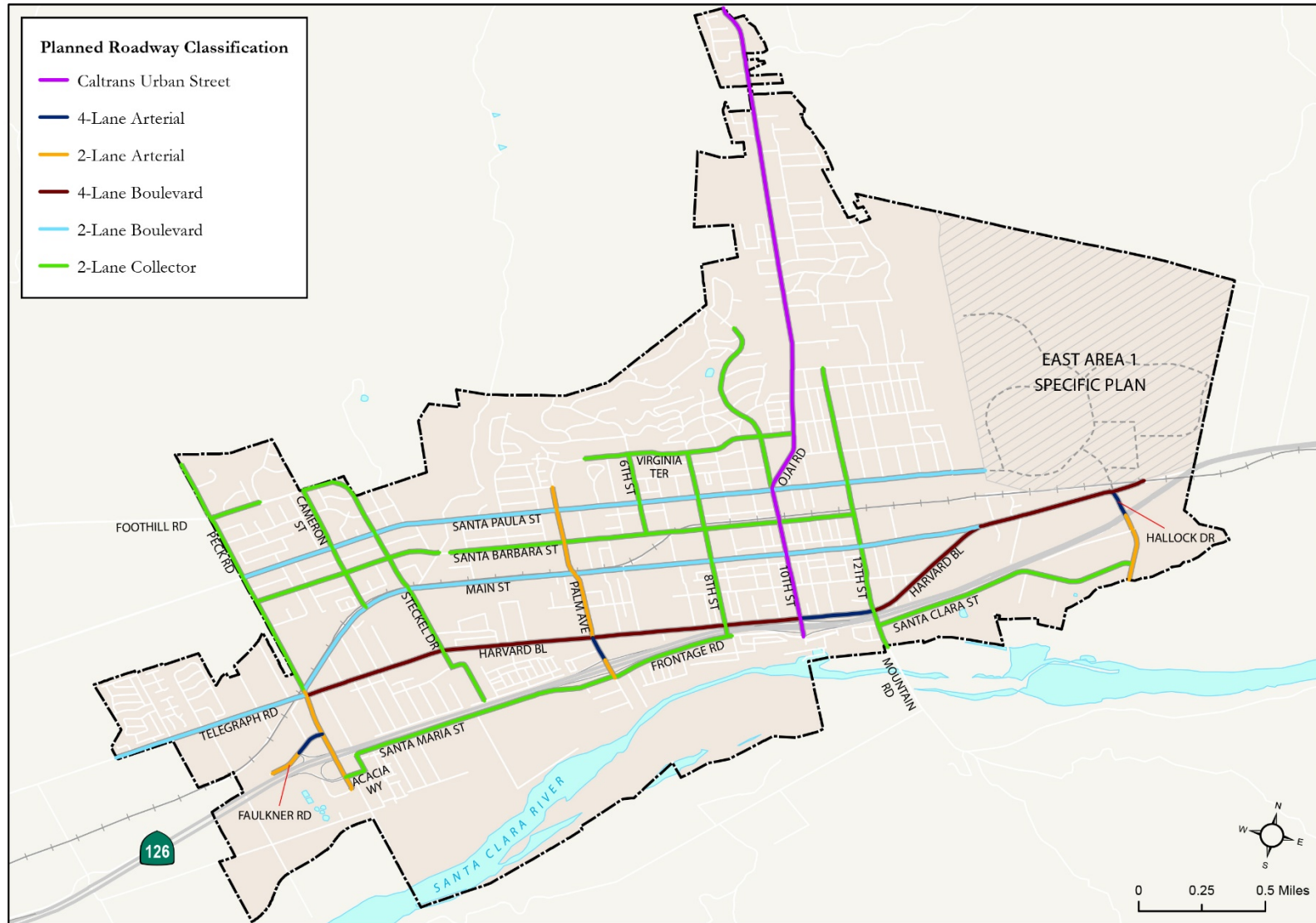


Exhibit 3.4-3 Proposed 2040 Circulation Network



Table 3.4-5 Proposed Changes to the Existing Circulation Network

Roadway	Segment	Existing (2016) Configuration	Planned Classification	Description	Implementation Requirements
Peck Road	From northern terminus to Main Street	2-lane arterial	2-lane collector	Downgraded to Collector due to excess capacity and residential land uses.	No changes required
	From Main Street to southern terminus	2-lane arterial	2-lane arterial	No change	No changes required
Cameron Street	From Foothill Road to Main Street	2-lane collector	2-lane collector	No change	No changes required
Steckel Drive	From Foothill Road to southern terminus	2-lane collector	2-lane collector	No change	No changes required
Palm Avenue	From northern terminus to Harvard Boulevard	2-lane arterial	2-lane arterial	No change	No changes required
	From Harvard Boulevard to SR 126 WB ramps	2-lane arterial	4-lane arterial	Widened to 4 lanes	Widen roadway to 64 feet and restripe as 4-lanes with center left-turn lane
	From SR 126 WB ramps to southern terminus	2-lane arterial	2-lane arterial	No change	No changes required
6 th Street	From Virginia Terrace to Santa Barbara Street	2-lane collector	2-lane collector	No change	No changes required
8 th Street	From Virginia Terrace to Santa Maria Street	2-lane collector	2-lane collector	No change	No changes required
10 th Street	From northern terminus to Santa Paula Street	2-lane collector	2-lane collector	No change	No changes required
10 th Street / SR 150	From Santa Paula Street to Santa Maria Street	2-lane Caltrans urban street	2-lane Caltrans urban street	No change	No changes required
Ojai Road / SR 150	From northern City limit to Santa Paula Street	2-lane Caltrans urban street	2-lane Caltrans urban street	No change	No changes required
12 th Street	From Richmond Road to Main Street	2-lane collector	2-lane collector	No change	No changes required
	From Main Street to Harvard Boulevard	2-lane arterial	2-lane collector	Downgraded to Collector based upon excess capacity and the redefinition of Collector as a freeway-serving roadway.	No changes required
S. Mountain Road	From Harvard Boulevard to City limit	2-lane arterial	2-lane arterial	No change	No changes required



Roadway	Segment	Existing (2016) Configuration	Planned Classification	Description	Implementation Requirements
Hallock Drive	From Telegraph Road to SR 126	4-lane arterial	4-lane arterial	No change	No changes required
	From SR 126 to Old Hallock Drive	3-lane arterial	2-lane arterial	Redefined as 2-lane roadway based upon excess capacity.	Restripe as 2-lane roadway with on-street parking or shoulder if desired.
	From Old Hallock Drive to southern terminus	2-lane arterial	2-lane arterial	No change	No changes required
Foothill Road	From western City limit to Ridgecrest Drive	2-lane collector	2-lane collector	No change	No changes required
Virginia Terrace	From western terminus to Ojai Road	2-lane collector	2-lane collector	No change	No changes required
Santa Paula Street	From western City limit to Santa Paula Creek	2-lane collector	2-lane boulevard	Upgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 2-lane roadway with buffered Class II bike lanes or Class IV cycle track. Additional width can accommodate on-street parking.
Santa Barbara Street	From Peck Road to 12 th Street	2-lane collector	2-lane collector	No change	No changes required
Telegraph Road	From western City limit to Peck Road	2-lane arterial	2-lane boulevard	Downgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 2-lane roadway with buffered Class II bike lanes or Class IV cycle track. Additional width can accommodate on-street parking.
	From Main Street/ Harvard Boulevard to 850 feet east of Main Street/Harvard Boulevard	4-lane arterial	4-lane boulevard	Downgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Widen to 68 feet and restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes or Class IV cycle track. No parking is recommended.
	From 850 feet east of Main Street to eastern terminus	2-lane arterial	4-lane boulevard	Upgraded to Boulevard and widened to 4 lanes to reflect the roadway's importance in providing east-west multimodal connectivity.	Widen to 68 feet and restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes or Class IV cycle track, as desired by City. No parking is recommended.
Main Street	From Peck Road to Steckel Drive	2-lane arterial (Peck to Lucada) 3-lane arterial (Lucada to Laurie) 4-lane arterial (Laurie to Steckel)	2-lane boulevard	Downgraded to 2-Lane Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 2-lane roadway with on-street parking.



Roadway	Segment	Existing (2016) Configuration	Planned Classification	Description	Implementation Requirements
	From Steckel Drive to Harvard Boulevard	2-lane arterial	2-lane boulevard	Downgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 2-lane roadway with on-street parking.
Harvard Boulevard	From Peck Road to 10 th Street	4-lane arterial	4-lane boulevard	Downgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes and on-street parking where width permits.
	From 10 th Street to 12 th Street	2-lane arterial	4-lane arterial	Widened to 4 Lanes.	Widen roadway to 44 feet and restripe as 4-lanes (Option for 3-Lane Boulevard with center left-turn lane). No parking is recommended.
	From 12 th Street to 440 feet west of Main Street	2-Lane Arterial	4-Lane Boulevard	Upgraded to Arterial and widened to 4 lanes to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes or Class IV cycle track, as desired by City. One lane of parking where width permits on the north side.
	From 440 feet west of Main Street to Main Street	3-lane arterial	4-lane boulevard	Upgraded to Arterial and widened to 4 lanes to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes or Class IV cycle track, as desired by City. One lane of parking where width permits on the north side.
Faulkner Road	From end to SR 126 WB ramps	2-lane arterial	2-lane arterial	No change	No changes required
	From SR 126 WB ramps to Peck Road	4-lane arterial	4-lane arterial	No change	No changes required
Santa Maria Street	From Acacia Road to eastern terminus (airport parking lot)	2-lane collector	2-lane collector	No change	No changes required



CEQA and the CEQA Guidelines require that the evaluation of environmental impacts must be based upon conditions that are “reasonably foreseeable” rather than speculative. The word *buildout* does not appear in either CEQA or the Guidelines. The following references provide guidance in this regard:

Project means an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment...
(*Public Resources Code* §21065)

In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project...An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable. (CEQA Guidelines §15064(d))

Effects include ... Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems. (CEQA Guidelines §15358(a)(2))

The courts have also clarified the appropriate approach to environmental analysis. For example, in a recent challenge to the adoption of county zoning regulations a California appellate court concluded “The County should consider the potential environmental impacts resulting from reasonably foreseeable future development resulting from the ordinance.” *Aptos Council v. County of Santa Cruz* (10 Cal.App.5th 226,2017)

Direct vs. Cumulative Impacts

Adoption of the 2040 General Plan would not cause direct impacts because no specific development project is proposed in conjunction with adoption of the Plan. Rather, the potential impacts associated with Plan adoption would be cumulative or indirect in nature, and would result from the collective impacts of many individual future projects consistent with the Plan. The CEQA Guidelines provide the following guidance regarding the evaluation of cumulative impacts:

The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from



individually minor but collectively significant projects taking place over a period of time.
(*CEQA Guidelines §15355(b)*)

The proper procedure for identifying cumulative impacts is described in CEQA Guidelines §15130:

- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. ... The following elements are necessary to an adequate discussion of significant cumulative impacts:
 - (1) Either:
 - (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
 - (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. ...
 - (d) Previously approved land use documents, including, but not limited to, general plans, specific plans, regional transportation plans, plans for the reduction of greenhouse gas emissions, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in section 15152(f), in a certified EIR for that plan.

This Program EIR relies upon the “summary of projections” approach described in CEQA Guidelines §15130(b)(1)(B), above. The relevant summary of projections utilized is the same as in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)⁴ adopted by Southern California Association of Governments (SCAG).

⁴ <http://scagrtpscs.net/Pages/2016RTPSCS.aspx>



SCAG is the Federally-designated metropolitan planning organization (MPO) for the six-county region that includes Ventura County. As required by State and Federal law, every four years SCAG produces an RTP/SCS. The RTP/SCS is based upon an integrated growth forecast used for both transportation planning and housing needs assessments. The most recent RTP/SCS was adopted by SCAG in 2016 for the 2016-2040 period. In addition to planning for the SCAG region, the Ventura County Transportation Commission (VCTC) uses the RTP/SCS growth forecast for countywide transportation planning, and public and private agencies typically use the same forecasts in estimating future demand for such things as schools, water supply, wastewater treatment, energy, solid waste disposal, and the establishment of development impact fees.⁵

For all of the reasons discussed above, the City of Santa Paula has determined that the analysis of impacts presented in this EIR should be based upon the projected level of growth adopted by SCAG in the 2016-2040 RTP/SCS.

As discussed in the topical environmental analysis presented in **Section 4** the projected level of development is most relevant to the analysis of air quality, greenhouse gases, noise and transportation because those impacts are proportionally related to the level of development.

2040 Horizon Year Development Assumptions

According to the Governor's Office of Planning and Research (OPR), most jurisdictions have selected 20 years as the horizon for the general plan. The horizon does not mark an end point but rather provides a general context in which to make shorter-term decisions.⁶ The City has selected 2040 as the appropriate planning horizon for the proposed General Plan, which is consistent with OPR's guidance as well as SCAG's 2016-2040 RTP/SCS growth forecast, as discussed in the previous section.

Table 3.4-6 shows the level of household and employment growth projected to occur in Santa Paula and Ventura County as a whole during the 2016-2040 period based on the SCAG 2016-2040 RTP/SCS. During this period SCAG forecasts a growth of approximately 2,900 households and 3,900 jobs in Santa Paula. SCAG's forecasting methodology considers national, state and regional trends as well as local land use policies and patterns.⁷

5 See, for example, the Santa Paula 2016 Development Impact Mitigation Fee Update Report, p. 14

6 Governor's Office of Planning and Research, *General Plan Guidelines* (2017) p. 23

7 A description of SCAG's forecasting methodology for the 2016-2040 RTP/SCS can be found at http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf

3. Project Description
3.4 – Project Characteristics



Table 3.4-6 Santa Paula 2040 Household and Employment Forecast

Jurisdiction	Households ¹			Employment		
	2016	2040	Growth	2016	2040	Growth
Santa Paula ²	8,608	11,500	2,892	7,840	11,700	3,860
Ventura County	271,000	312,000	41,000	335,000	420,000	85,000

Source: Southern California Association of Governments

1 Households = occupied housing units

2 Based upon City boundaries as of 2015

Table 3.4-7 compares Santa Paula’s estimated development capacity based on the proposed 2040 General Plan to the 2040 regional growth forecast adopted by the Southern California Association of Governments in the 2016-2040 RTP/SCS. As shown in this table, the estimated capacity for new housing development based on current land use designations is similar to the 2040 growth forecast while the capacity for additional non-residential development exceeds the adopted employment forecast. It is important to recognize that *development potential* reflects what could occur based upon City plans and regulations, but actual development will be dependent upon a variety of factors including economic and real estate market conditions and individual property owner desires. The significance of this table is that the proposed 2040 General Plan land use designations would not preclude Santa Paula from achieving the level of development adopted by SCAG in the 2016-2040 regional growth forecast.

Table 3.4-7 Potential Development Capacity vs. 2040 Growth Forecast

	Estimated Potential Development Capacity ¹			2016-2040 Forecast ²
	City	SOI and Expansion Areas	Total	
Housing	3,096	1,213	4,309	2,892
Employment	4,894	6,506	11,400	3,860

1. Table 3.4-8 (employment assumes 500 sf per employee)

2. SCAG 2016-2040 RTP/SCS (net increase 2016-2040) based upon 2015 City boundaries

Note: Estimated capacity is in *housing units* while the SCAG forecast is *households*. Since the forecast of households excludes vacant units, these metrics are slightly different but are still useful for long-range planning purposes.

Table 3.4-8 estimates the total development capacity in Santa Paula and its SOI and expansion areas based on proposed 2040 General Plan land use designations and adopted specific plans. This table shows that there is an estimated potential development capacity for approximately 3,096 dwelling units within the city and 1,213 dwelling units in the SOI and expansion areas (primarily Adams and Fagan Canyons) based on proposed 2040 General Plan designations. Non-residential land could accommodate approximately 2.4 million square feet of development (gross building floor area) in the city and 3.2 million square feet in the SOI and expansion areas based on proposed land use designations. Based upon these estimates and assumptions, the proposed Plan could accommodate the level of growth assumed in the 2016-2040 RTP/SCS.



Table 3.4-8 Potential Development by General Plan Land Use Category [JHD1]

General Plan Designation (assumed residential density)	Land Area (acres)				Estimated Development Potential			
	City		SOI & Expansion Areas		Residential (DU)		Non-Residential (SF)	
	Vacant ¹	Developed	Vacant ¹	Developed	City	SOI & EAs	City	SOI & EAs
Residential²								
Residential - Hillside (2.4 du/ac)	24.2	249.9	-	93.7	58	-	-	-
Residential - Single-Family (5.6 du/ac)	20.8	583.7	1.0	76.4	116	5	-	-
Residential - Medium Density (12.0 du/ac)	2.0	206.3	-	-	23	-	-	-
Residential – Medium-High Density (16.8 du/ac)	1.1	87.7	-	-	18	-	-	-
Residential - High Density (23.2 du/ac)	-	39.9	-	-	-	-	-	-
Mobile Home Park (8.0 du/ac)	-	81.3	-	-	-	-	-	-
Subtotals	48.1	1,248.8	1.0	170.9	215	5	-	-
Mixed Use³								
Mixed Use: Commercial/Light Industrial (23.2 du/ac)	40.7	158.2	2.5	88.4	839	263	620,428	38,572
Mixed Use: Office/Residential (23.2 du/ac)	0.8	19.5	-	-	55	-	11,629	0
Subtotals	41.5	177.7	2.5	88.4	894	263	632,057	38,572
Commercial⁴								
Central Business	-	10.5	-	-	24	-	-	-
Commercial – General	10.2	130.7	-	-	422	-	156,200	-
Commercial - Office	0.7	11.0	-	-	34	-	14,900	-
Commercial - Neighborhood	-	3.4	-	-	8	-	-	-
Subtotals	10.9	157.6	-	-	487	-	171,100	-
Industrial								
Airport	-	51.0	-	-	-	-	-	-
Industrial - General	13.4	81.6	21.4	14.1	-	-	204,779	325,637
Industrial Park	36.4	44.1	-	-	-	-	396,294	-
Industrial – Light ⁵	10.2	55.2	-	-	-	-	132,894	-
Subtotals	60.0	231.9	21.4	14.1	-	-	733,967	325,637
Institutional								
Institutional/Civic	-	168.7	-	-	-	-	-	-



General Plan Designation (assumed residential density)	Land Area (acres)				Estimated Development Potential			
	City		SOI & Expansion Areas		Residential (DU)		Non-Residential (SF)	
	Vacant ¹	Developed	Vacant ¹	Developed	City	SOI & EAs	City	SOI & EAs
Agriculture and Open Space								
Agriculture (0.04 du/ac)	-	-	20.7	358.8	-	-	-	-
Open Space/ Parks and Recreation	0.1	67.8	2.7	81.2	-	-	-	-
Open Space/ Passive	273.3	58.2	48.9	72.7	-	-	-	-
Subtotals	273.4	126.0	72.3	512.8	-	-	-	-
Specific Plans								
SP-3 East Area 1	537.1	-	-	-	1,500	-	240,000	-
SP-4 East Gateway	7.3	25.3	-	-	-	-	670,000	-
SP-6 Santa Paula West Business Park ⁶	-	-	46.9	-	-	-	-	640,300
Subtotals	544.4	25.3	46.9	-	1,500	-	910,000	640,300
Expansion Areas								
Adams Canyon (SP-1)	-	-	5,413	-	-	495	-	TBD
Fagan Canyon (SP-2)	-	-	2,173	-	-	450	-	76,230
East Area 3 ⁷	-	-	25.6	-	-	-	-	342,380
West Area 2 ⁸	-	-	173.5	-	-	-	-	1,830,000
South Mountain (SP-5)	-	-	1,292	-	-	-	-	-
Subtotals	-	-	9,077	-	-	945	-	2,248,610
Grand Totals	978	2,136	9,221	786	3,096	1,213	2,447,124	3,253,119

Notes:

1. Includes land currently under development
2. Development assumptions based on 80% of maximum density for residential areas
3. Assumes 50% of vacant land and 10% of developed land will be developed for residential use. Non-residential assumes 0.35 FAR for vacant land in both categories. Density is assumed to be 23.2 du/ac (80% of maximum 29 du/ac).
4. Assumes 50% of vacant land and 10% of developed land will be developed for residential use. Density is assumed to be 23.2 du/ac (80% of maximum 29 du/ac).
5. Includes SP-7 (Air-Park)
6. Assumes 42.0 developable acres at 0.35 FAR
7. EA 3 includes the remaining portion of East Area 2 after the annexation of East Gateway Specific Plan. Development potential based on Land Use Element Table 2-3.
8. Excluding Santa Paula West Business Park. Development potential based upon estimated 120 developable acres at 0.35 FAR (to be refined as part of the specific plan process).

Sources:

General Plan Data: City of Santa Paula and Ventura County GIS, 2016
Vacancy Data: Ventura County Assessor, 2016



3.5 Intended Uses of the EIR

Development as allowed under the 2040 General Plan would require a number of discretionary and ministerial approvals by the City and other Responsible and Trustee Agencies. Consistent with §15124 of the CEQA Guidelines, the **Table 3.5-1** identifies the public agencies that are expected to utilize this EIR in their decision-making processes.

Table 3.5-1 Public Agencies Expected to Use This EIR

Agency	Permits/Other Approvals/Consultation
City of Santa Paula	The Planning Commission and the City Council will utilize the EIR in deciding whether to approve the 2040 General Plan and subsequent public works plans and projects, capital improvement programs, regulations, and private development projects.
California Department of Transportation, District 7 (Los Angeles)	Encroachment permits, if necessary
California Department of Fish and Wildlife	Permits for habitat/streambed alteration, if necessary
Regional Water Quality Control Board-Los Angeles Region	National Pollutant Discharge Elimination System (NPDES) Permits, Storm Water Pollution Prevention Plans (SWPPP) and Monitoring Program Plans (MPP).
Southern California Association of Governments	The General Plan is considered to be a project of Statewide, Regional or Areawide Significance (CEQA Guidelines §1520) and SCAG may comment on the General Plan and EIR.
US Fish and Wildlife Service	Permits for incidental take of endangered or threatened species, if necessary
Ventura County Transportation Department	Review of development projects regarding impacts to county roadways. Encroachment permits, if necessary
Ventura County Watershed Protection District	Permits for any development affecting jurisdictional redline channels. Comment on implementation actions such as drainage plans.
Ventura Local Agency Formation Commission	Amendments to the Sphere of Influence and annexations.

3. Project Description
3.5 – Intended Uses of the EIR



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4. Environmental Setting and Impact Analysis

4.1 Methodology

This chapter presents topic-specific analyses of the potential environmental impacts expected to result from the approval and implementation of the proposed 2040 General Plan. The topical issues addressed herein were identified by the City of Santa Paula in its capacity as Lead Agency and presented in **Appendix A - Initial Study and Notice of Preparation, and Scoping Comments**.

The format for analysis of each environmental topic is as follows:

- **Setting** – a description of the existing physical conditions and the regulatory framework relevant to the environmental topic as of the NOP publication date (November 8, 2017), unless noted otherwise;
- **Thresholds of Significance** – the thresholds for determining the significance of each identified project-related and cumulative environmental effect based on Appendix G of the CEQA Guidelines (*see sidebar*);
- **Project Impacts, Mitigation Measures and Level of Significance** – analysis of project-specific impacts and cumulative impacts that would result from adoption of the General Plan, in consideration of proposed General Plan policies and programs that would reduce the impacts, and a determination of the significance of the impacts based on the identified threshold for the issue. When an impact is potentially significant, feasible mitigation measures are identified that would

Note: Between the time the NOP was published (November 2017) and the publication of this Draft EIR, amendments to the CEQA Guidelines were adopted by the California Natural Resources Agency. The updated Guidelines became effective on December 28, 2018. As stated by the Office of Planning and Research, “The revisions to the Guidelines are prospective and new requirements apply to steps in the CEQA process not yet undertaken by the effective date of the revisions. (CEQA Guidelines, §15007, subd. (b).) The revised Guidelines apply to a CEQA document only if the revised Guidelines are in effect when the document is sent out for public review. (CEQA Guidelines, §15007, subd. (c).)” As a result, readers will note some differences between the Checklist topics and questions in the NOP (Appendix A) and the analysis in this chapter of the EIR (e.g., new sections related to Energy and Wildfire and revised checklist questions for other topics).



reduce potential environmental impacts, and the level of significance of the impact after mitigation is determined;

Cumulative Impacts

CEQA requires that an EIR examine both direct and “cumulative” impacts. As discussed in CEQA Guidelines §15130(a)(1), a cumulative impact “consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” The analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall “reflect the severity of the impacts and their likelihood of occurrence” (CEQA Guidelines §15130(b)). EIRs should also define the geographic scope of the area for which cumulative effects are analyzed. (CEQA Guidelines §15130(b)(3))

Since the proposed Project is an update to the citywide General Plan, in most cases the Santa Paula Area of Interest (see **Exhibit 3.2-2** on page [3-3](#)) is the appropriate geographic scope for analysis of project impacts in this PEIR. For air quality and greenhouse gas emissions, the geographic scope for project impacts is expanded to Ventura County as a whole due to the nature of these impacts. The geographic scope for analysis of cumulative impacts is the entire SCAG region, which encompasses Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura counties.

CEQA Guidelines §15130(b)(1) provides that the analysis of cumulative impacts should be based on either:

- (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The analysis of cumulative impacts in this PEIR utilizes approach B, a summary of projections contained in the adopted 2016-2040 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The analysis of cumulative air quality impacts also relies upon the 2016 Ventura County Air Quality Management Plan, which is consistent with the 2016-2040 RTP/SCS.



CEQA Guidelines §15130(d) provides guidance regarding the analysis of cumulative impacts for a project that is consistent with another programmatic plan and the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed in a certified EIR for that plan:

- (d) Previously approved land use documents, including, but not limited to, general plans, specific plans, regional transportation plans, plans for the reduction of greenhouse gas emissions, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in section 15152(f), in a certified EIR for that plan.

Accordingly, the analysis of cumulative impacts in this PEIR incorporates by reference the analysis contained in the PEIR for the SCAG 2016-2040 RTP/SCS, which was certified by the SCAG Regional Council on April 7, 2016 (Resolution No. 16-578-1). That SCAG PEIR states “Lead agencies for individual projects may use this PEIR as the basis of their regional and cumulative impacts analysis.”⁸

A summary analysis of cumulative impacts consistent with the principles described above is provided in the analysis for each environmental topic in **Chapter 4**.

Significant Impacts

A key aspect of this analysis is the determination of whether an impact is “significant.”

“*Significant effect*” is defined by CEQA Guidelines §15382 as:

...a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The proposed 2040 General Plan includes policies that address environmental as well as social and economic issues. While social and economic issues are not part of the environmental impact

8 SCAG 2016-2040 RTP/SCS PEIR, p. 2-32



evaluation, they will be considered by the City Council in its decision whether to approve the proposed General Plan.

Incorporation by Reference

To minimize duplication and redundancy, CEQA Guidelines §15150 explicitly allows the use of relevant analysis published in previous documents, as follows:

15150. Incorporation By Reference

- (a) An EIR or Negative Declaration may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the text of the EIR or Negative Declaration.
- (b) Where part of another document is incorporated by reference, such other document shall be made available to the public for inspection at a public place or public building. The EIR or Negative Declaration shall state where the incorporated documents will be available for inspection. At a minimum, the incorporated document shall be made available to the public in an office of the Lead Agency in the county where the project would be carried out or in one or more public buildings such as county offices or public libraries if the Lead Agency does not have an office in the county.
- (c) Where an EIR or Negative Declaration uses incorporation by reference, the incorporated part of the referenced document shall be briefly summarized where possible or briefly described if the data or information cannot be summarized. The relationship between the incorporated part of the referenced document and the EIR shall be described.
- (d) Where an agency incorporates information from an EIR that has previously been reviewed through the state review system, the state identification number of the incorporated document should be included in the summary or designation described in subdivision (c).
- (e) Examples of materials that may be incorporated by reference include but are not limited to:
 - (1) A description of the environmental setting from another EIR.
 - (2) A description of the air pollution problems prepared by an air pollution control agency concerning a process involved in the project.
 - (3) A description of the city or county general plan that applies to the location of the project.
 - (4) A description of the effects of greenhouse gas emissions on the environment.



- (f) Incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand.

When information from a prior document is relied upon in this analysis, the source is cited and the analysis is summarized to avoid unnecessary duplication.

The remaining sections of this chapter present the analysis of potential environmental impacts that would be expected to result from adoption and implementation of the 2040 General Plan.



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4.2 Aesthetics

4.2-1 Setting

Existing Physical Conditions

1. Visual Character of the Planning Area. Santa Paula is nestled between the foothills of the Santa Paula Mountains to the north and the Santa Clara River, which generally forms the City's southern boundary. The rugged peak of South Mountain is located south of the city, across the river. Citrus and avocado orchards and fields of row crops border the city to the east and west. Creeks and barrancas slice through the urban lands. Views of these open space resources are available from many locations throughout the Planning Area.

Santa Paula's urbanized area has developed in a traditional style, with a grid-pattern street system, prominent buildings of architectural interest, an identifiable downtown, and tightly-knit surrounding residential neighborhoods. The community maintains a small-town image. The city is compact, with a "hard edge" to development that clearly delineates the urban area from the surrounding farmlands. It has a dense development pattern compared to more sprawling suburban cities. Most buildings are 1 to 2 stories tall with a small number of 3-story buildings. Many old oak trees in town have been preserved, especially in the northeastern part of the city. A City ordinance (Municipal Code Section 156.580 et seq.) protects native oaks, sycamores and other trees of historic or cultural significance. These characteristics define the "urban form" which is the physical and aesthetic characteristic of Santa Paula.

2. Scenic Vistas and Resources. Natural scenic resources of the Santa Paula Planning Area include the following:
 - Santa Clara River
 - Santa Paula Creek
 - Adams Canyon
 - Fagan Canyon
 - Santa Paula Canyon
 - Barrancas
 - Mountains to the north and south
 - Hillsides to the east
 - Agricultural lands



The following developed and man-made scenic resources are also found in Santa Paula and the surrounding area:

- State Route 126 (eligible state scenic highway east of SR 150)
 - State Route 150 (eligible state scenic highway)
 - City scenic routes: Foothill Road, Highways 126 and 150, 12th Street south of the Highway
 - Historic districts
 - In-town scenic drive
 - Agricultural lands
 - City parks
 - Views of the town from surrounding hillsides
3. Historic Resources. A number of eligible, and potentially eligible historic resources exist within the Santa Paula area. Downtown Santa Paula and adjacent areas contain a wide variety of structural remains reminiscent of a rich agricultural, social, economic, and political heritage. Santa Paula has one of the best collections of historic structures in Southern California. Numerous historic resources related to the founding of the City and reflecting its growth and development between 1873 and 1945 are located within the present City limits.
4. Light and Glare. Light and glare sources within the Planning Area are primarily associated with residential, commercial, and industrial land uses. Street lights are provided along major streets, and signs are a source of light in commercial areas. The light and glare that exist in the developed areas of the city are typical for an urban setting. Street lights are less common in rural areas. Natural open space resources serve as important habitat areas for wildlife, which may be sensitive to light and glare.

Regulatory Framework

State Scenic Highways Program

Streets and Highways Code Section 260 et seq. establishes procedures and criteria for the designation State Scenic Highways. This program is administered by the California Department of Transportation (Caltrans). SR 150 and the segment of SR 126 east of SR 150 are designated as eligible state scenic highways (**Exhibit 4.2-1**). An eligible scenic highway may change to an officially designated scenic highway when the local jurisdiction adopts a scenic corridor protection program, applies to the Caltrans for scenic highway approval, and receives notification from Caltrans that the highway has been designated as a Scenic Highway.



Exhibit 4.2-1 Scenic State Highways in Ventura County



Ventura County General Plan

The County's current General Plan covers scenic resources in Chapter 1, Resources. Section 1.7 includes goals, policies, and programs related to scenic resources. Several Area Plans also contain applicable goals and policies related to scenic resources; however, none of the Area Plans specifically address the area immediately surrounding Santa Paula.

Santa Paula General Plan

The proposed 2040 Santa Paula General Plan includes a variety of policies and programs that address, either directly or indirectly, impacts to visual resources and which would be applicable to future development. Specific policies and programs that would reduce potential impacts are discussed in **Table 4.2-1** and **Table 4.2-2** below.

Santa Paula Municipal Code

The Municipal Code contains regulations that, either directly or indirectly, would affect the visual character of future development in the city. Such provisions include the following:

- **Hillside Grading.** Chapter 16.98 of the Development Code establishes standards for hillside grading practices. The expressed intent of the ordinance is to:
 - (1) Encourage only minimal grading which relates to the natural contour of the land, and which will round off, in a natural manner, sharp angles at the top and ends of cut and fill slopes so as to avoid a "staircase" or "padding" effect;
 - (2) Require the retention of trees and other vegetation which stabilize steep hillsides, retain moisture, prevent erosion, and enhance the natural scenic beauty and, where necessary, require additional landscaping to enhance the scenic qualities of the hillsides;
 - (3) Encourage a variety of building types and design, when appropriate, to materially reduce grading and disturbance of the natural character of the area;
 - (4) Require immediate planting wherever appropriate to maintain necessary cut and fill slopes, to stabilize slopes with plant roots, and to conceal bare soil from view; and
 - (5) Impose appropriate conditions on the development of all slopes to obtain conformity with approved development policies of the city's General Plan.
- **Design Review.** Chapter 16.226 of the Development Code establishes a design review process intended to:
 - (A) Promote orderly, attractive, and harmonious development throughout Santa Paula;



- (B) Recognize neighborhood character and environmental limitations in development;
 - (C) Ensure that the design and exterior architectural treatment of proposed structures complement the design or exterior architectural treatment of existing structures in the immediate neighborhood and do not conflict with existing development in any manner that would cause a substantial depreciation of property values in the neighborhood; and
 - (D) Promote the general welfare by preventing establishment of uses or erection of structures having qualities which would not meet the specific intent clauses or performance standards of this Title 16, or which are not properly related to their sites, surroundings, traffic circulation, or environmental setting.
 - (E) Assure conformance with the provisions of this Title 16 and in particular, for conformance with the design, land use regulations and development standards set forth in Chapters 16.07 through 16.76 and the Design Review Guidelines set forth in City Council Resolution 5298.
- **Historic Overlay District.** Chapter 16.33 of the Development Code establishes regulations for the protection and recognition of historic buildings and neighborhoods with historic merit. The overlay requires special development and design review standards for projects within the Historic Overlay district and provides for the identification and designation of historic places, buildings, works of art, neighborhoods, and other objects of historic or cultural interest within the city.
 - **Tree preservation.** Section 156.580 et seq. protects native oaks, sycamores and other trees of historic or cultural significance.
 - **Outdoor lighting.** Section 16.42.050 of the Development Code establishes standards for outdoor lighting, including lighting intensity and shielding to prevent light spillage onto adjacent properties.
 - **Development review procedures.** All future development is subject to the City's development review process as outlined in Chapter 16.202 of the Development Code. The review process establishes procedures for reviewing development applications to ensure that projects comply with all applicable design guidelines and standards.

Specific Plans

A specific plan is a regulatory tool that local governments use to guide development in a localized area and to systematically implement the General Plan. Specific plans contain detailed development standards, distribution of land uses, infrastructure requirements, and implementation measures for the development of a specific geographic area.



The City requires specific plans for all expansion areas, except for annexations of minor acreage within areas that are already substantially developed. Details of siting, design, infrastructure, provision of open space, and financing are established through the specific plans. Each specific plan must address locations for land uses identified by the General Plan Land Use Element. Mitigation of environmental impacts and design standards for new development must also be addressed.

Specific plans currently in effect include East Area 1 (SP-3) and East Gateway (SP-4). Specific plans would also be required for the following expansion areas prior to their annexation and development:

- Adams Canyon
- Fagan Canyon
- East Area 2
- West Area 2

4.2-2 Thresholds of Significance

Threshold of significance criteria relative to Aesthetics are based on Appendix G of the CEQA Guidelines. The project would be deemed to have a significant aesthetics impact if the project or if project-related activities were to:

- a) Have a substantial adverse effect on a scenic vista (Impact AES-1);
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway (Impact AES-2);
- c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality (Impact AES-3);
- d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area (Impact AES-4).

4.2-3 Environmental Impact Analysis

Methodology and Assumptions

Aesthetics and visual resources are generally subjective by nature; therefore, impacts are difficult to quantify. As such, this analysis was conducted qualitatively, assessing potential impacts of anticipated growth consistent with the proposed 2040 General Plan on the existing visual character. The geographic scope for the analysis of Project impacts is the Santa Paula Area of



Influence as identified in **Exhibit 3.2-2** (page [3-3](#)) and the geographic scope for cumulative impacts is the entire SCAG region.

Impact AES-1: Substantial adverse effect on a scenic vista

Impact Discussion

Project Impacts. Development consistent with the 2040 General Plan would convert substantial undeveloped areas to urban or suburban uses. Adams Canyon and Fagan Canyon would be the most highly impacted, as these areas currently support primarily agriculture and/or open space. Additional infill development within the urbanized portions of the city would result in incremental visual changes.

Table 4.2-1 summarizes the proposed General Plan policies and programs that would substantially reduce potential impacts to scenic vistas.

Table 4.2-1 General Plan Policies and Programs That Reduce Impacts on Scenic Vistas

Policies	Programs
<p>LU 1.3 Natural features. Ensure that new development and infrastructure are designed in a manner that protects the natural features such as barrancas, tree rows, wetlands, ridgelines, and wildlife movement corridors.</p> <p>LU 1.4 Urban forest. Protect and expand the city's urban forest.</p> <p>LU 1.9 Hillside development. Ensure that development in hillside areas occurs in a manner that protects the natural character, environmental resources, aesthetic qualities, public health and safety, and discourage grading and development on land with a slope greater than 30%.</p> <p>LU 1.12 Underground utilities. To the greatest extent feasible, all new and existing utility lines shall be placed underground at the time of development.</p> <p>LU 2.1 Natural resource preservation. Land development should be designed to preserve significant agriculture and natural areas identified in the Environmental and Cultural Resources Element. Development should be directed away from the most productive soils and sensitive natural areas. Where development is allowed near agriculture and natural areas, it should be designed to be compatible with and have minimal adverse impacts upon such areas, such as through the use of buffers.</p> <p>LU 2.2 Expansion areas. Require that development in expansion areas involving canyons or greenbelts provides land for parks, recreation and open space at a ratio of 5 acres per 1,000 people with a minimum of 10% of the total land area dedicated as permanent open space.</p> <p>LU 3.2 Public amenities. Provide sufficient land for amenities to enrich the lives of citizens, such as parks and open space, cultural facilities such as theaters and museums, and preservation of natural and historic places.</p>	<p>LU 1.c Sign regulations. Enforce sign regulations that prohibit new billboards and encourage the removal of existing billboards along major viewsheds and non-conforming signs.</p> <p>LU 1.e Hillside development standards. Enforce the City's hillside grading regulations that protect the visual character of hillside areas.</p> <p>LU 1.h Development review. As part of the development review process, assist applicants in demonstrating conformance with applicable standards and design guidelines through the use of checklists, handouts, etc.</p> <p>ECR 6.a. Land use planning. Use Open Space land use designations to preserve scenic, environmentally constrained and recreational properties, and establish appropriate standards for the type and intensity of development in or adjacent to the river, creeks and barrancas. Continue to provide an Institutional/Civic or Open Space designation, as appropriate, for all public buildings and lands.</p> <p>ECR 6.b. Open space acquisition. Establish a priority system and seek funding for the acquisition of open space within the city and the expansion areas. Consider the use of open space easements, long-term leases, cooperative agreements, and other cost-effective means of preserving open space. Establish an open space district modeled after the Conejo Open Space Conservation Agency that would hold title and manage open space lands such as steep and undevelopable hillside and canyon areas.</p> <p>ECR 6.c. Urban open space. Expand the urban forest through a City-sponsored Street Tree Master Plan and</p>

4. Environmental Setting and Impact Analysis

4.2 Aesthetics



Policies	Programs
<p>The following policies and standards are proposed for Adams Canyon Expansion Area:</p> <ul style="list-style-type: none"> - Require dedication of 100 acres for public recreation facilities and 200 acres of passive public open space with all improvements to be paid for by developer. - Development shall be designed and sited to maintain the character of significant open spaces, to maintain views and vistas and to protect natural habitat. - Clustering of development is required to provide a variety of housing types and protect open space, agriculture, and habitat. - Use extensive landscaping, xeriscaping, etc. Forty percent (40%) of lots/development shall be landscaped or natural open space. - Locate building pads and develop the sites and roadways with minimized grading and reduced amounts of cut and fill slopes. - Require the inclusion of drainage and flood control improvements designed to be natural in appearance. - Avoid ridgeline development on prominent ridgelines. <p>The following policies and standards are proposed for Fagan Canyon Expansion Area:</p> <ul style="list-style-type: none"> - Development shall be designed and sited to maintain the character of significant open spaces, to maintain views and vistas and to protect natural habitat. - Clustering of development is required to protect open space, agriculture, and habitat. - Use extensive landscaping, xeriscaping, etc. Forty percent (40%) of lots/development shall be landscaped or natural open space. - Locate building pads and develop the sites and roadways with minimized grading and reduced amounts of cut and fill slopes. - Require the inclusion of drainage and flood control improvements designed to be natural in appearance. - Avoid ridgeline development on prominent ridgelines. <p>ECR 6.1. Open space planning and development. The Santa Clara River, Santa Paula Creek and the ridgelines, mountains and canyons surrounding the city should be treated as important assets to be conserved, and new development must be designed in a manner sensitive to the natural features of the site and the surrounding character. All new residential, commercial, and industrial developments shall provide open space amenities, and development south of the Santa Clara River should be limited to low-intensity uses requiring few public services or infrastructure.</p> <p>ECR 6.2. Open space acquisition. Acquisition of additional public open space shall be prioritized based upon the following factors: good visual qualities, significant natural resources, significant physical constraints and/or good passive recreational opportunities.</p> <p>ECR 6.3. Urban open space. Provide ample open green spaces within the city, including public gathering places and tree-lined streets.</p>	<p>"orchard" plantings in large new parking lots. Provide additional public gathering places in the city.</p>



The proposed policies and programs would enhance the visual character of development in undeveloped areas, and also encourage cluster development, open space protection, and the use of natural materials. However, future development, particularly in the hill and canyon areas north of the city, would change the essential character of undeveloped areas from rural to suburban. No additional mitigation measures are available to address this impact, which would be significant and unavoidable.

Cumulative Impacts. Development throughout the SCAG region would result in the conversion of open space to urban uses, and the SCAG 2016-2040 RTP/SCS PEIR determined that impacts to scenic vistas would be significant and unavoidable.⁹ While the proposed 2040 General Plan policies and programs would substantially reduce potential impacts on scenic vistas within the Santa Paula area, incremental impacts would be cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed 2040 General Plan policies and programs.

Level of Significance after Mitigation

Significant impact

Impact AES-2: Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway

Impact Discussion

Project Impacts. SR-150 and SR-126 east of SR-150 are designated as eligible state scenic highways. The proposed General Plan policies and programs listed in **Table 4.2-1** above would substantially reduce potential impacts to scenic resources including trees, rock outcroppings and historic buildings to a level that is less than significant.

Cumulative Impacts. The SCAG 2016-2040 RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would result in less than significant cumulative impacts to scenic resources.¹⁰ The proposed Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

⁹ SCAG 2016-2040 RTP/SCS DPEIR, p. 3.1-36

¹⁰ SCAG 2016-2040 RTP/SCS DPEIR, p. 3.1-31



Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

Impact AES-3: Degradation of the existing visual character or quality of public views of the site and its surroundings in non-urbanized areas; or conflict with applicable zoning and other regulations governing scenic quality in an urbanized area

Impact Discussion

Project Impacts. Development consistent with the 2040 General Plan would convert substantial undeveloped areas that are within public viewsheds to urban or suburban uses. The Expansion Areas would be the most highly impacted, as these areas currently support primarily agriculture and natural open space. As noted above under Impact AES-1, although the proposed policies and programs summarized in **Table 4.2-1** would substantially reduce potential impacts to the existing visual character or quality of undeveloped expansion areas, impacts would still be significant and unavoidable. Additional infill development in urbanized areas of the city would result in incremental changes to visual character; however, new development would be required to comply with zoning and other regulations governing scenic quality. Therefore, aesthetic impacts in urbanized areas would be less than significant.

Cumulative Impacts. Anticipated new growth and development throughout the SCAG region would change the character of the region over time, and the SCAG 2016-2040 RTP/SCS PEIR determined that impacts to existing visual character would be significant and unavoidable.¹¹ While the proposed 2040 General Plan policies and programs would substantially reduce potential impacts to the existing visual character within the Santa Paula area, incremental impacts would be cumulatively considerable.

Level of Significance

Potentially significant

11 SCAG 2016-2040 RTP/SCS DPEIR, p. 3.1-36



Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs.

Level of Significance after Mitigation

Significant impact

Impact AES-4: Creation of a new source of substantial light or glare

Impact Discussion

Project Impacts. New development as contemplated in the proposed General Plan would result in new sources of light and glare, particularly in undeveloped Expansion Areas. Measures to control light spillage from new outdoor lighting fixtures such as street lighting, pedestrian lighting, recreational facilities lighting and security lighting are required by Section 16.42.050 of the Development Code, as outlined previously in Section 4.2-1 – Setting. In addition, proposed General Plan policies and programs that would address this issue are listed in **Table 4.2-2**.

Table 4.2-2 General Plan Policies and Programs that Reduce New Sources of Light and Glare

Policies	Programs
LU 1.13 Noise, light and glare. Land uses should be located, designed and managed in a way that minimizes impacts from unwanted noise, light and glare. In addition, the following policy is proposed for the Adams Canyon and Fagan Canyon Expansion Areas: <ul style="list-style-type: none">- Require new lighting that is part of any proposed development to be oriented away from sensitive uses and shielded to the extent possible to minimize glare and spill over.	LU 1.g Lighting. Require adequate lighting to provide for public safety consistent with the character of the development. Lighting should be oriented away from sensitive uses and shielded to the extent possible to minimize spill over and glare on adjacent properties.

Although these policies and programs together with existing regulations such as §16.42.050 of the Development Code, which establishes standards for outdoor lighting, including lighting intensity and shielding to prevent light spillage onto adjacent properties, would substantially reduce potential impacts to the existing visual character or quality of the Planning Area, impacts are still considered to be significant due to the potential for urban development in Expansion Areas where no major sources of light and glare currently exist.

Cumulative Impacts. Anticipated new growth and development throughout the SCAG region would result in additional sources of light and glare, and the SCAG 2016-2040



RTP/SCS PEIR determined that these impacts would be significant and unavoidable.¹² While the proposed 2040 General Plan policies and programs would substantially reduce potential impacts related to light and glare, incremental impacts would be cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs.

Level of Significance after Mitigation

Significant impact

¹² SCAG 2016-2040 RTP/SCS DPEIR, p. 3.1-36



4.3 Agriculture and Forestry Resources

4.3-1 Setting

Existing Physical Conditions

Ventura County is one of the leading agricultural areas in the nation, and agriculture has historically been important to the economy of Santa Paula. The combination of fertile soil and mild climate allows high-value crops to be planted year-round.

The only significant agricultural operations within Santa Paula's City limits are in East Area One; however, those operations are expected to gradually be replaced by urban development according to the approved Specific Plan.

Agriculture in the Santa Paula area outside the City limits, as well as commercial processing operations within the city, provide employment for local residents and a substantial segment of the local economic base.

The distribution of important farmland in Santa Paula's Area of Interest as reported by the California Department of Conservation Farmland Mapping and Monitoring Program is shown in **Exhibit 4.3-1**. Acreage totals for the various categories of farmland are summarized in **Table 4.3-1**.

Table 4.3-1 Farmland Acreage by Category

Category	Within City Limits (acres)	Total Area of Influence (acres)
Developed	2,489.9	3,060.7
Grazing	63.0	25,922.8
Local Importance	25.0	1,121.5
Prime	278.7	6,108.1
State Importance	0.3	1,462.6
Unique	341.9	3,792.4
Other	454.8	6,799.3
Totals	3,653.5	48,267.5

Sources: California Department of Conservation; Ventura County GIS, 2016

There are no forestry resources or timber production areas in the Area of Interest.

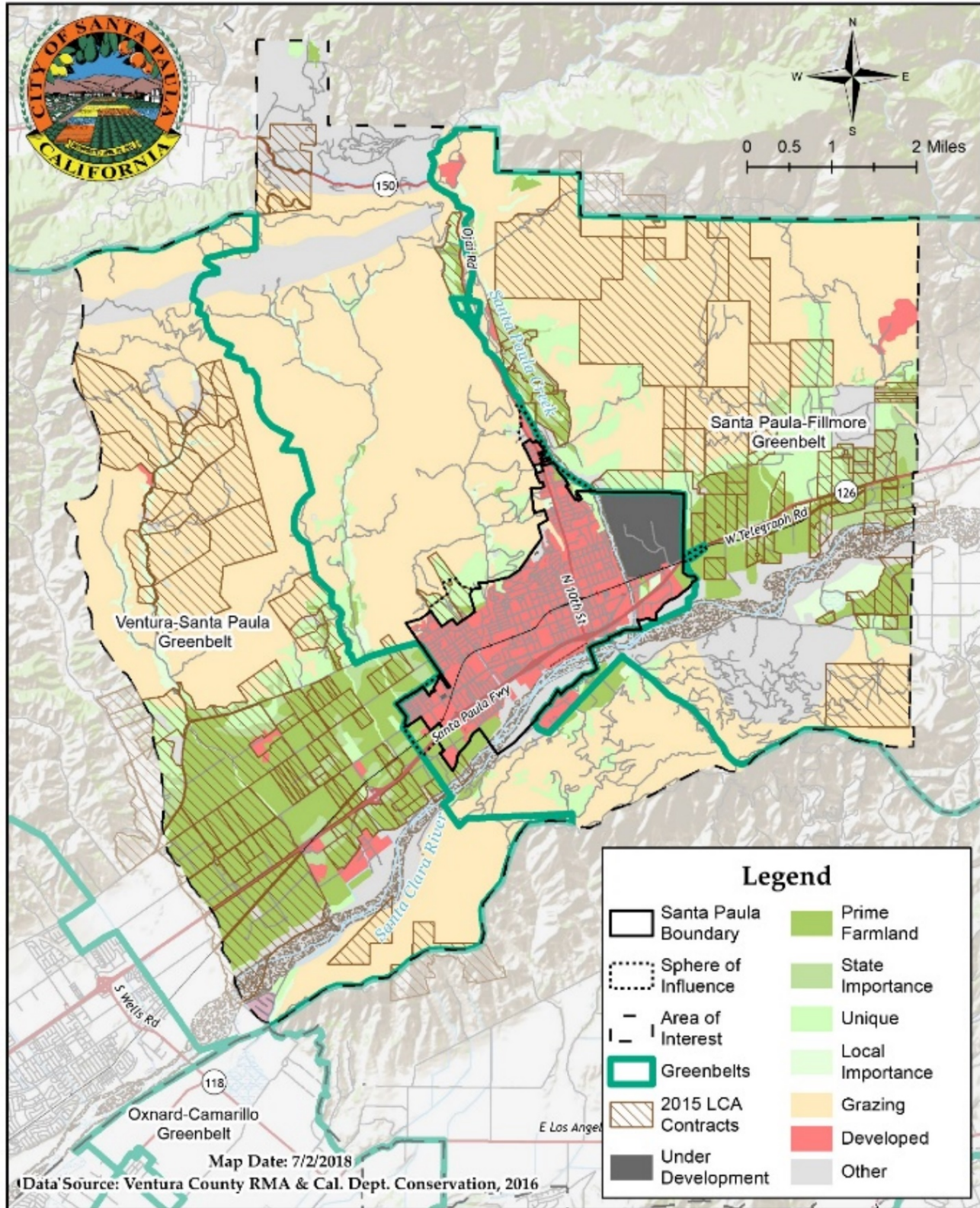


Exhibit 4.3-1 Greenbelts, Important Farmlands and LCA Contracts



Regulatory Framework

Federal

Farmland Protection Policy Act (FPPA).¹³ The National Agricultural Land Study of 1980-81 found that millions of acres of farmland were being converted in the United States each year. The 1981 Congressional report, *Compact Cities: Energy-Saving Strategies for the Eighties*, identified the need for Congress to implement programs and policies to protect farmland and combat urban sprawl and the waste of energy and resources that accompanies sprawling development. With this in mind, Congress passed the Agriculture and Food Act of 1981 (Public Law 97-98) containing the Farmland Protection Policy Act (FPPA) subtitle I of Title XV, Sections 1539-1549. The final rules and regulations were published in the Federal Register on June 17, 1994.

The FPPA is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It assures that, to the extent possible, federal programs are administered to be compatible with states, local governments, and private programs and policies to protect farmland. Federal agencies are required to develop and review their policies and procedures to implement the FPPA every 2 years.

For the purpose of FPPA, farmland includes prime farmland, unique farmland, and farmland of statewide or local importance. Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a Federal agency or with assistance from a Federal agency.

Farm and Ranch Lands Protection Program (FRPP).¹⁴ The FRPP provides matching funds to help purchase development rights to keep productive farm and ranchland in agricultural uses. Working through existing programs, the U.S. Department of Agriculture (USDA) partners with state, tribal, or local governments and non-governmental organizations to acquire conservation easements or other interests in land. USDA provides up to 50% of the fair market easement value of the conservation easement.

State

Farmland Mapping and Monitoring Program (FMMP).¹⁵ The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources.

13 U.S. Department of Agriculture, Natural Resources Conservation Service (https://www.nrcs.usda.gov/wps/portal/nrcs/detail?cid=nrcs143_008275)

14 US Department of Agriculture (<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/easements/farmranch/>)

15 California Department of Conservation (http://www.conservation.ca.gov/dlrp/fmmp/overview/Pages/prime_farmland_fmmp.aspx)



Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every 2 years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. The following categories of farmland are included in the FMMP:

Prime Farmland (P): Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

Farmland of Statewide Importance (S): Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

Unique Farmland (U): Farmland of lesser quality soils used for production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the 4 years prior to the mapping date.

Farmland of Local Importance (L): Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

Grazing Land (G): Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, the University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres.

Urban and Built-Up Land (D): Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, and institutional uses, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Other Land (X): Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip



mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

California Land Conservation Act.¹⁶ The California Land Conservation Act of 1965 – commonly referred to as the Williamson Act – enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based upon farming and open space uses as opposed to full market value.

The Land Conservation Act is implemented through three contract types: Land Conservation Contract (LCA); Farmland Security Zone Area Contract (FSZA/LCA); and Open Space Contract (OS/LCA) with different requirements applying to each.

State funding was provided in 1971 by the Open Space Subvention Act, which created a formula for allocating annual payments to local governments based on acreage enrolled in the Williamson Act Program. Subvention payments were made through FY 2009 but have been suspended in recent years due to revenue shortfalls.

Open Space Subvention Act (OSSA).¹⁷ The OSSA provides for the partial replacement of local property tax revenue foregone as a result of participation in the Land Conservation (Williamson) Act and other enforceable open space restriction programs (*California Government Code* §16140 et seq.). Participating local governments receive annual payments on the basis of the number of eligible acres, quality (soil type and agricultural productivity), and for Farmland Security Zone contracts, location (proximity to a city) of land enrolled under eligible enforceable open space restrictions.

California Farmland Conservancy Program (CFCP).¹⁸ The CFCP is a statewide grant funding program that supports local efforts to establish agricultural conservation easements and planning projects for the purpose of preserving important agricultural land resources. The CFCP provides grants to local governments and qualified non-profit organizations.

16 California Department of Conservation (<http://www.conservation.ca.gov/dlrp/lca>) and Ventura County Land Conservation Act Guidelines, 2013 (<http://vcma.org/pdf/programs/lca/LCA-Guidelines-2-13-1.pdf>)

17 California Department of Conservation (http://www.conservation.ca.gov/dlrp/lca/ossap/Pages/questions_answers.aspx)

18 California Department of Conservation (<http://www.conservation.ca.gov/dlrp/cfcp>)



Local

Ventura County Right-to-Farm Ordinance.¹⁹ The County's Right-to-Farm Ordinance was adopted by the Board of Supervisors in the late 1970s. It is administered by the Planning Division through the Zoning Ordinance and by the Agricultural Commissioner's Office. The Right-to-Farm Ordinance is intended to support and provide a safeguard for existing agricultural and farming operations that could be threatened by encroaching residential development. This is achieved through mandatory disclosure notifications provided to property owners who will be developing residential uses adjacent to or near existing agricultural operations. The disclosure informs people seeking to develop or purchase homes of the Right-to-Farm ordinance and the potential impacts that may be generated by nearby farming operations. The Ordinance also protects farms from nuisance complaints associated with proper farming practices.

Save Open Space and Agricultural Resources (SOAR). Please refer to the discussion in **Section 4.11 -Land Use and Planning**.

Santa Paula General Plan. The Environmental and Cultural Resources Element and Land Use Element include goals, objectives, policies and implementation measures intended to protect agricultural resources.

Santa Paula Municipal Code. The Municipal Code includes land use regulations related to agriculture in Title XVI, Chapter 16.11 (Agricultural Zone), although there is currently no land with this designation. Other Code sections pertaining to agriculture include Title V, Chapter 52 (Water), Title XVI, Chapter 16.15 (Commercial Zones), and Title XVI, Chapter 16.48 (Sign Regulations).

4.3-2 Thresholds of Significance

Thresholds of significance criteria relative to Agriculture and Forestry Resources are based upon Appendix G of the most recent CEQA Guidelines. The project would be deemed to have a significant impact if the project or project-related activities were to:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. (Impact AG-1)
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract. (Impact AG-2)

¹⁹ Ventura County 2040 General Plan Background Report, Public Review Draft, March 2017, p. 9-43



- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in *Public Resources Code* §12220(g)), timberland (as defined by *Public Resources Code* §4526), or timberland zoned Timberland Production (as defined by *Government Code* §51104(g)). (Impact AG-3)
- d) Result in the loss of forest land or conversion of forest land to non-forest use. (Impact AG-4)
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. (Impact AG-4)

4.3-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts to agriculture and forestry resources expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Influence as identified in **Exhibit 3.2-2** and the geographic scope for cumulative impacts is the entire SCAG region.

Impact AG-1: Convert important farmland to non-agricultural use

Impact Discussion

Project Impacts. Most of the land currently within the City limits is devoted to urban uses; therefore, infill development would not be expected to result in the conversion of important farmland. However, as seen in **Table 4.3-1** and **Exhibit 4.3-1**, approximately 646 acres within the city and over 12,000 acres in the entire Area of Interest is designated *Prime* or *Unique Farmland* or *Farmland of State or Local Significance*. Land designated *Grazing Land* represents more than half the total Area of Interest, and conversion of these lands to non-agricultural uses would not be considered a significant impact to farmland.

Portions of the Adams Canyon and Fagan Canyon expansion areas also support high quality soils, mostly within their lower reaches and particularly in natural drainage areas. Since the precise location of future development within the Expansion Areas has not been established, prime soils within these areas or other areas within the Sphere of Influence could be impacted by future development. This is a potentially significant impact. While the General Plan policies listed in **Table 4.3-2** would substantially reduce this potential impact, they would not ensure the preservation of all important farmland; therefore, this impact is considered significant and there are no feasible mitigation measures other than the proposed



General Plan policies that could further reduce the impact to a level that is less than significant.

Table 4.3-2 General Plan Policies and Programs That Reduce Impacts to Agricultural Resources

Policies	Programs
<p>LU 2.1. Natural resource preservation. Land development should be designed to preserve significant agriculture and natural areas identified in the Environmental and Cultural Resources Element. Development should be directed away from the most productive soils and sensitive natural areas. Where development is allowed near agriculture and natural areas, it should be designed to be compatible with and have minimal adverse impacts upon such areas, such as through the use of buffers.</p> <p>ECR 1.1. Land use and development. Where economically feasible, encourage the continuation of agriculture in the city. Development should be directed away from the most productive soils and agricultural areas. Where development is allowed near agriculture, it should be designed to be compatible with and have minimal adverse impacts upon agriculture, such as through the use of buffers.</p> <p>ECR 1.2. Land Conservation Act Contracts. Require any proposed land development in an area covered by a Land Conservation Act (Williamson Act) contract to comply with all regulations regarding contract cancellation prior to development.</p>	<p>LU 2.b. Agricultural buffers. Require development adjacent to agricultural areas to provide a buffer (setback, landscaping, recreational uses, street, etc.) to minimize potential conflicts.</p> <p>ECR 1.a. Agricultural land preservation. Work cooperatively with other organizations to facilitate the preservation of agricultural land in perpetuity, where feasible, through techniques such as transfer of development rights and conservation easements.</p> <p>ECR 1.b. Land planning and development review. Require any proposal to change the General Plan or zoning designation from agriculture to another use to provide an analysis of the feasibility of continued agricultural use. Require proposed developments on or adjacent to agricultural land to evaluate impacts and identify mitigation measures to minimize impacts on agricultural operations, such as by providing a buffer (e.g., setback, landscaping, recreational facility, street).</p> <p>ECR 1.c. Right-to-Farm Ordinance. Adopt a Right-to-Farm Ordinance with specific requirements to preserve existing and encourage new agricultural land uses and require disclosure to potential land buyers that agricultural operations are protected from nuisance lawsuits.</p>

Cumulative Impacts. Anticipated new growth and development throughout the SCAG region would result in the loss and disturbance of agricultural lands, and the SCAG 2016-2040 RTP/SCS PEIR determined that these impacts would be significant and unavoidable.²⁰ While the proposed 2040 General Plan policies and programs would substantially reduce potential impacts to important farmland within the Santa Paula area, incremental impacts could be cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs.

20 SCAG 2016-2040 RTP/SCS DPEIR, p. 3.2-28



Level of Significance after Mitigation

Significant impact

Impact AG-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract

Impact Discussion

Project Impacts. No land within the current City limits is zoned for agricultural use; therefore, the 2040 General Plan would not conflict with existing zoning for agricultural use.

However, as seen in **Exhibit 4.3-1**, some portions of the Expansion Areas are within Williamson Act (Land Conservation Act) contracts. Potential development under the 2040 General Plan could lead to premature development within these areas. This is a potentially significant impact. However, the General Plan policies listed in **Table 4.3-2** would substantially reduce this potential impact to a level that is less than significant.

Cumulative Impacts. The loss of agriculture on protected Williamson Act contract lands as a result of regional growth would be expected to exacerbate an ongoing loss of protected agricultural lands, and the SCAG 2016-2040 RTP/SCS PEIR determined that these impacts would be significant and unavoidable.²¹ However, the proposed 2040 General Plan policies and programs would substantially reduce potential cumulative impacts related to agricultural zoning and Williamson Act contracts within the Santa Paula area to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

21 SCAG 2016-2040 RTP/SCS DPEIR, p. 3.2-28



Impact AG-3: Conflict with existing zoning for forest land or loss of forest land

Impact Discussion

Project Impacts. No land is zoned or designated as forest land or timberland within the city or the Expansion Areas; therefore, no adverse impacts to forestry resources would occur under the proposed 2040 General Plan.²²

Cumulative Impacts. The SCAG 2016-2040 RTP/SCS PEIR determined that future development in the SCAG region would not contribute to cumulative impacts regarding existing zoning for forest land, timberland, or timberland zoned, or potential need to rezone timberland resources.²³ The proposed Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

No impact

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

Impact AG-4: Involve other changes that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use

Impact Discussion

Project Impacts. In addition to the potential for direct conversion of farmland to urban uses, development under the 2040 General Plan could result in conflicts between agricultural activities and adjacent urban uses (e.g., dust, odors, use of fertilizers and pesticides) that could discourage continued farming. However, the General Plan policies and programs listed in **Table 4.3-2** would substantially reduce this potential impact to a level that is less than significant.

Cumulative Impacts. The SCAG 2016-2040 RTP/SCS PEIR determined that regional development would contribute to cumulative significant impacts in regard to the loss of forest land or conversion of forest land to non-forest use.²⁴ However, the proposed 2040

²² SCAG 2016-2040 RTP/SCS DPEIR, Table 3.2.2-4, p. 3.2-13

²³ SCAG 2016-2040 RTP/SCS DPEIR, p. 3.2-24

²⁴ SCAG 2016-2040 RTP/SCS DPEIR, p. 3.2-24



General Plan policies and programs would substantially reduce potential cumulative impacts related to farmland and forest land within the Santa Paula area to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

4. Environmental Setting and Impact Analysis
4.3 Agriculture and Forestry Resources



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4.4 Air Quality and Greenhouse Gas Emissions

4.4-1 Setting

Existing Physical Conditions

(Note: Information presented in this section incorporates by reference information presented in the 2016-2040 SCAG RTP/SCS Program EIR, Chapter 3.3²⁵, the 2016 Ventura County AQMP²⁶ and Initial Study/Negative Declaration²⁷, and the Ventura County General Plan Background Report, Section 8.1²⁸)

Topography, Climate, and Atmospheric Conditions. Ventura County is located in the South Central Coast Air Basin, which comprises all of San Luis Obispo, Santa Barbara, and Ventura counties. The air above Ventura County often exhibits weak vertical and horizontal dispersion characteristics, which limit the dispersion of emissions and cause increased ambient air pollutant levels. Persistent temperature inversions prevent vertical dispersion and act as a “ceiling” that prevents pollutants from rising and dispersing. Mountain ranges act as “walls” that inhibit horizontal dispersion of air pollutants.

The diurnal land/sea breeze pattern common in Ventura County recirculates air contaminants. Air pollutants are pushed toward the ocean during the early morning by the land breeze, and toward the east during the afternoon by the sea breeze. This creates a “sloshing” effect, causing pollutants to remain in the area for several days. Residual emissions from previous days accumulate and chemically react with new emissions in the presence of sunlight, thereby increasing ambient air pollutant levels.

This pollutant sloshing effect happens most predominantly from May through October (smog season). Air temperatures are usually higher and sunlight is more intense during the smog season. This explains why Ventura County experiences the most exceedances of the CAAQS and NAAQS for ozone during this 6-month period.²⁹

Air Quality Monitoring and Existing Pollutant Concentrations. There are currently six active air quality monitoring stations in Ventura County, with the El Rio/Rio Mesa School station being the closest to Santa Paula. **Table 4.4-1** summarizes pollutant concentrations measured at this station from 2010 to 2015. EPA and ARB use this type of monitoring data to designate areas according to attainment status for criteria air pollutants established by the agencies.

25 http://scagrtppscs.net/Documents/2016/peir/draft/2016dPEIR_3_3_AirQuality.pdf

26 <http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/Final-2016-Ventura-County-AQMP.pdf>

27 <http://bosagenda.countyofventura.org/sirepub/cache/2/nhfpcl1u0tro4cyky2ruoeu00/101282103152019111833166.PDF>

28 http://vc2040.org/wp-content/uploads/2018/01/VCGPU_8-PRDBR-Natural_Resources_January_2018.pdf

29 Ventura County 2040 General Plan Background Report, Public Review Draft, March 2017, Chapter 8



Table 4.4-1 Summary of Air Pollutant Concentrations

SUMMARY OF AIR POLLUTANT CONCENTRATIONS						
El Rio – Rio Mesa School #2 (Ventura County) ^{1,2}						
2010-2015						
	2010	2011	2012	2013	2014	2015
Ozone – 1 Hour						
California Maximum Concentration (ppm)	0.083	0.081	0.082	0.067	0.112	0.070
# Days > State Standard	0	0	0	0	1	0
Ozone – 8 Hour						
California Maximum Concentration (ppm)	0.073	0.069	0.065	0.063	0.077	0.066
# Days > California Standard	1	0	0	0	2	0
National Maximum Concentration (ppm)	0.072	0.068	0.065	0.062	0.077	0.066
# Days > National Standard	0	0	0	0	1	0
Fine Particulate Matter (PM_{2.5}) – 24 Hour						
California Maximum Concentration (µg/m ³)	27.8	28.7	30.8	22.2	22.2	25.5
National Maximum Concentration (µg/m ³)	21.4	18.3	30.8	19.9	22.3	25.5
# Days > National Standard (measured ³)	0	0	0	0	0	0
Respirable Particulate Matter (PM₁₀)⁴ – 24 Hour						
California Maximum Concentration (µg/m ³)	61.5	51.7	56.9	46.7	51.3	93.3
# Days > California Standard (measured ³)	1	1	1	4	7	6
National Maximum Concentration (µg/m ³)	59.9	50.6	56.3	45.9	51.1	92.0
# Days > National Standard (measured ³)	0	0	0	0	0	0
Nitrogen Dioxide (NO₂) – 1 Hour						
California Maximum Concentration (ppb)	60	90	57	40	39	36
# Days > California Standard	0	0	0	0	0	0
National Maximum Concentration (ppb)	60.0	90.0	57.0	40.0	39.0	36.0
# Days > National Standard	0	0	0	0	0	0

¹ Notes: µg/m³ = micrograms per cubic meter; ppm = parts per million; ppb = parts per billion; * = no data: data unavailable or insufficient for this location during time period.

² No monitoring station in Ventura County collects CO data.

³ Measured days are those days that an actual measurement was greater than the level of the California Ambient Air Quality Standards (CAAQS) or the National Ambient Air Quality Standard (NAAQS). Estimated days are the estimated number of days that measurement would have exceeded the applicable CAAQS or NAAQS if measurements had been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.

⁴ PM₁₀ statistics may include data that are related to an exceptional event, which EPA defines as an event “for which the normal planning and regulatory process established by the Clean Air Act (CAA) is not appropriate” (ARB 2016c).

Source: California Air Resources Board (ARB). iADAM Top 4 Summary. <http://www.arb.ca.gov/adam/topfour/topfour1.php>. Accessed October 18, 2016c. Data compiled by Ascent Environmental 2016.



Table 4.4-2 shows recent data regarding air pollutant attainment status in Ventura County.

Table 4.4-2 Air Pollutant Attainment Status Designations – Ventura County

Pollutant	California Designation	National Designation
Ozone	Nonattainment	Nonattainment (serious)
PM ₁₀	Nonattainment	Unclassifiable
PM _{2.5}	Attainment	Unclassifiable / Attainment
Carbon Monoxide	Attainment	Unclassifiable/ Attainment
Nitrogen Dioxide	Attainment	Unclassifiable / Attainment
Lead	Attainment	Unclassifiable / Attainment
Sulfur Dioxide	Attainment	Attainment
Sulfates	Attainment	No National Standard
Hydrogen Sulfide	Unclassifiable	No National Standard
Visibility Reducing Particles	Unclassifiable	No National Standard

¹ Notes: PM₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; PM_{2.5} = fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less.

Sources: California Air Resources Board (CARB). *Area Designation Maps / State and National*.

<http://www.arb.ca.gov/desig/adm/adm.htm#state>, Accessed March 22, 2016e. United States Environmental Protection Agency (EPA). *Criteria Pollutant Nonattainment Summary Report as of October 1, 2015*.

<https://www3.epa.gov/airquality/greenbook/anc13.html>, Accessed March 22, 2016a.

Data compiled by Ascent Environmental 2016.

Ozone. From 2010 to 2015, three violations occurred for the CAAQS and one violation occurred for the NAAQS for the 8-hour ozone standards. One violation was recorded for the CAAQS 1-hour ozone standard. As of October 2016, EPA lists Ventura County as a Serious Nonattainment area for the NAAQS for 8-hour ozone.

Particulate Matter. The state PM₁₀ standard was exceeded 20 times from 2010 to 2015. There were no violations of the federal PM₁₀ standard or either the state or federal PM_{2.5} standards.

Carbon Monoxide (CO). CO levels were not reported at the Rio Mesa station and Ventura County is classified as an Attainment area by CARB.

Greenhouse Gasses (GHG).³⁰ A layer of GHGs – primarily water vapor, and including much smaller amounts of carbon dioxide, methane and nitrous oxide – acts as a thermal blanket for the earth, absorbing heat and warming the surface to a life-supporting average of 59 degrees Fahrenheit (15 degrees Celsius).

Most climate scientists agree that the main cause of the current global warming trend is human expansion of the greenhouse gas effect – warming that results when the atmosphere traps heat radiating from the earth toward space.

30 Ventura County Regional Energy Alliance, *Climate on the Move*, 2015 (http://www.vcenergy.org/images/Complete_Climate_on_the_Move_Report.pdf)



Certain gases in the atmosphere block heat from escaping. Long-lived gases that remain semi-permanently in the atmosphere and do not respond physically or chemically to changes in temperature are described as “forcing” climate change. Gases, such as water vapor, which respond physically or chemically to changes in temperature are seen as “feedbacks.”

Gases that contribute to the greenhouse effect include:

Water vapor. Water vapor is the most abundant GHG, but importantly, it acts as a feedback to the climate. Water vapor increases as the earth's atmosphere warms, but so does the possibility of clouds and precipitation, making these some of the most important feedback mechanisms to the greenhouse effect.

Carbon dioxide (CO₂). A minor but very important component of the atmosphere, CO₂ is released through natural processes such as respiration and volcano eruptions and through human activities such as deforestation, land use changes, and burning fossil fuels. Humans have increased atmospheric CO₂ concentration by a third since the Industrial Revolution began. This is the most important long-lived “forcing” of climate change.

Methane (CH₄). A hydrocarbon gas produced through natural sources and human activities, including the decomposition of wastes in landfills, agriculture, and especially rice cultivation, as well as ruminant digestion and manure management associated with domestic livestock. On a molecule-for-molecule basis, CH₄ is a far more active greenhouse gas than carbon dioxide, but also one that is much less abundant in the atmosphere.

Nitrous oxide (N₂O). A powerful GHG produced by soil cultivation practices, especially the use of commercial and organic fertilizers, fossil fuel combustion, nitric acid production, and biomass burning.

Chlorofluorocarbons. Synthetic compounds entirely of industrial origin used in a number of applications, but now largely regulated in production and release to the atmosphere by international agreement for their ability to contribute to destruction of the ozone layer. They are also GHGs.

Over the last century the burning of fossil fuels like coal and oil has increased the concentration of atmospheric CO₂. This happens because the coal- or oil-burning process combines carbon with oxygen in the air to make CO₂. To a lesser extent, clearing land for agriculture, industry, and other human activities has also increased concentrations of GHGs.

The consequences of changing the natural atmospheric greenhouse are difficult to predict, but certain effects seem likely.

On average, the earth will become warmer. Some regions may welcome warmer temperatures, but others may not.



Warmer conditions will probably lead to more evaporation and precipitation overall, but individual regions will vary, some becoming wetter and others dryer.

A stronger greenhouse effect will warm the oceans and partially melt glaciers and other ice, increasing sea level. Ocean water will expand if it warms, contributing further to sea level rise.

Meanwhile, some crops and other plants may respond favorably to increased atmospheric CO₂, growing more vigorously and using water more efficiently. At the same time, higher temperatures and shifting climate patterns may change the areas where crops grow best and affect the makeup of natural plant communities.

In its Fourth Assessment Report, the Intergovernmental Panel on Climate Change (IPCC), a group of 1,300 independent scientific experts from countries all over the world under the auspices of the United Nations, concluded that there is a more than 90% probability that human activities over the past 250 years have warmed our planet.

The industrial activities that our modern civilization depend upon have raised atmospheric CO₂ levels from 280 parts per million to 379 parts per million in the last 150 years. The IPCC also concluded that there is a greater than 90% probability that human-produced GHGs such as CO₂, CH₄, and N₂O have caused much of the observed increase in the earth's temperatures over the past 50 years.

The Ventura County Regional Energy Alliance (VCREA) is a joint powers authority with representation from local governments, schools, and utilities. In 2015, VCREA prepared an integrated community inventory of GHG emissions both regionally and for each of its local government member organizations.



The most recent version of the community inventory was published by VCREA in December 2015 and reported emissions for 2010, 2011, and 2012 calendar years. In 2012, total county emissions were approximately 7.2 million MTCO₂e. **Exhibit 4.4-1** and **Table 4.4-3** illustrate countywide GHG emissions by sector.

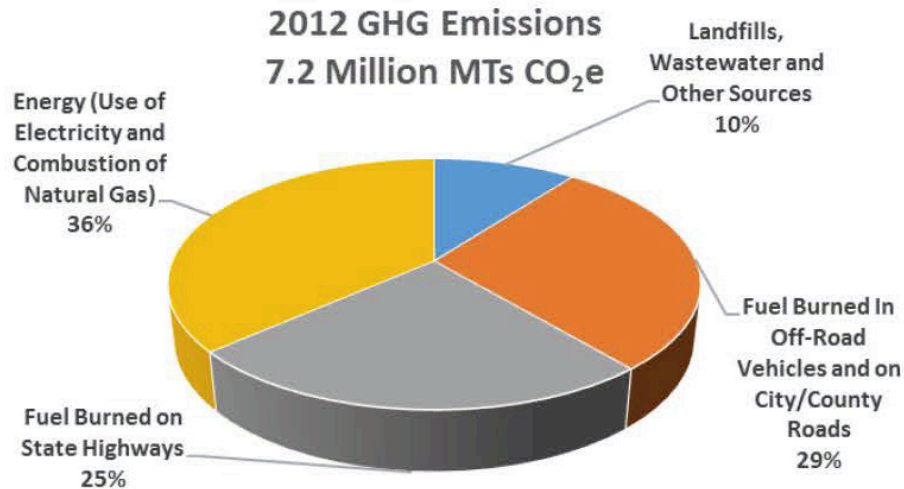


Exhibit 4.4-1 Ventura County Greenhouse Gas Emissions by Source, 2012

Table 4.4-3 Ventura County Greenhouse Gas Emissions by Sector

Sector	2010 (MT CO ₂ e)	2011 (MT CO ₂ e)	2012 (MT CO ₂ e)
On-road transportation (city/ county roads and state highways)	3,431,902	3,365,498	3,298,797
Non-residential electricity use	1,180,013	1,193,681	1,203,290
Other emissions*	695,653	708,326	744,191
Residential natural gas use	652,908	661,374	606,383
Residential electricity use	544,774	550,843	528,023
Off-road vehicle use	508,966	511,592	517,748
Non-residential natural gas use	267,807	295,166	299,306
Total	7,282,023	7,286,479	7,197,738

Source: Ventura County Regional Energy Alliance, 2015

Values in this table may not add due to rounding.

*Includes emissions from gases with high global warming potential, methane, and nitrous oxide from wastewater treatment plants and landfills.



Estimates of GHG emissions for Santa Paula are shown in **Exhibit 4.4-2** and **Table 4.4-4**. Total GHG emissions attributed to Santa Paula were estimated to be approximately 113,069 MTCO₂e, or about 1.6% of the countywide total.

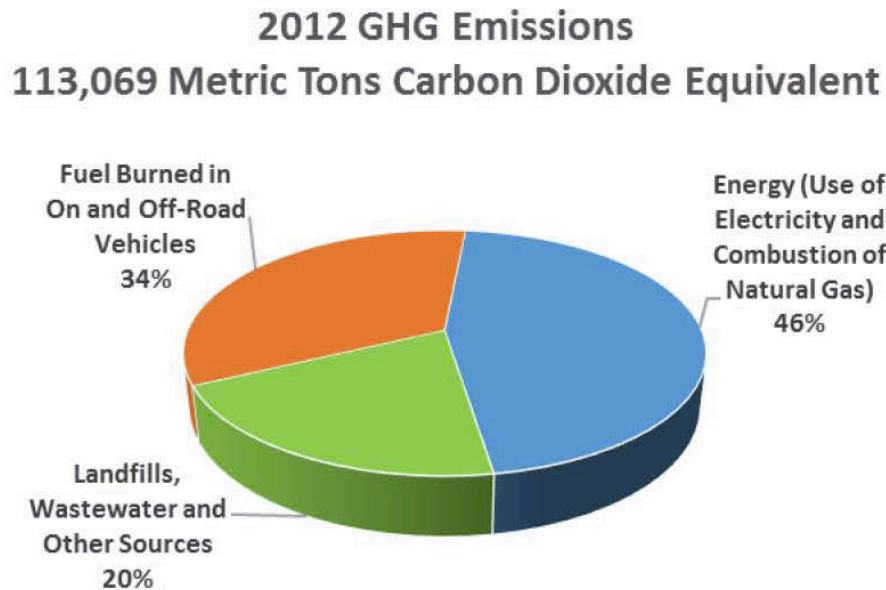


Exhibit 4.4-2 Santa Paula Greenhouse Gas Emissions by Source

Table 4.4-4 Santa Paula Greenhouse Gas Emissions by Sector

Sector	2010 (MT CO ₂ e)	2011 (MT CO ₂ e)	2012 (MT CO ₂ e)
On-road transportation (city/ county roads and state highways)	26,426	25,914	25,401
Non-residential electricity use	17,548	18,062	18,276
Other emissions*	21,527	21,860	23,048
Residential natural gas use	17,388	16,753	15,963
Residential electricity use	13,247	13,320	13,386
Off-road vehicle use	13,177	13,356	12,644
Non-residential natural gas use	4,470	4,834	4,351
Total	113,783	114,099	113,069

Source: Ventura County Regional Energy Alliance, 2015

Values in this table may not add due to rounding.

*Includes emissions from gases with high global warming potential, methane, and nitrous oxide from wastewater treatment plants and landfills.



Regulatory Framework

Federal

U.S. Environmental Protection Agency (EPA). EPA is in charge of developing regulations and implementing national air quality programs. EPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), enacted in 1970. Congress made the most recent major amendments to the CAA in 1990.³¹

Criteria Air Pollutants. The Clean Air Act required EPA to establish the National Ambient Air Quality Standards (NAAQS).³² EPA established primary and secondary NAAQS for several different pollutants, expressed in maximum allowable concentrations generally defined in units of parts per million (ppm) or in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The CAA also required each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP).

Regions that do not meet one or more air quality standards are referred to as "nonattainment areas." The Clean Air Act Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. EPA is responsible for reviewing SIPs to determine whether they conform to the mandates of the CAA and its amendments, and whether implementation will achieve air quality goals.

If EPA determines an SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area. If an approvable SIP is not submitted or implemented within the mandated time frame, sanctions may be applied to transportation funding and stationary air pollution sources in the basin. The Ventura County Air Pollution Control District (VCAPCD) has an approved SIP.³³

Toxic Air Contaminants/Hazardous Air Pollutants. Air quality regulations also focus on Toxic Air Contaminants (TACs), which are also referred to as Hazardous Air Pollutants (HAPs) by federal agencies. In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no threshold level below which adverse health impacts may not be expected to occur. Instead, EPA and, in California, the Air Resources Board (ARB), regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the maximum achievable control technology or best available control technology for toxics to limit emissions. (See the

31 <https://www.epa.gov/laws-regulations/summary-clean-air-act>

32 NAAQS are published by USEPA at <https://www.epa.gov/criteria-air-pollutants/naaqs-table>

33 <https://www.arb.ca.gov/planning/sip/planarea/vensip.htm>



discussion of TACs in the “State” section below for a description of ARB’s efforts.) These, in conjunction with additional rules set forth by the VCAPCD, described below, establish the regulatory framework for TACs.

General Conformity Rule. The CAA requires that federal actions conform to the appropriate SIP so that they do not interfere with strategies employed to attain the NAAQS. The rule applies to federal actions in areas designated as nonattainment areas for any of the six criteria pollutants and in some areas designated as maintenance areas. Project-level conformance with the SIP is demonstrated through a general conformity applicability analysis as a first step. A general conformity determination would be required if a proposed action’s total direct and indirect emissions for each affected pollutant for which the region is classified as a “maintenance area” or a “nonattainment area” for the national standards are above the *de minimis* levels established by the conformity rule. If the condition above is not met, a general conformity determination must be performed to demonstrate that total direct and indirect emissions for each affected pollutant for which the region is classified as maintenance or nonattainment for the national standards would conform to the applicable SIP.

U.S. Supreme Court Ruling on Carbon Dioxide as a Pollutant. In 2007 the Supreme Court of the United States in *Massachusetts v. Environmental Protection Agency* (549 U.S. 497) ruled that CO₂ is an air pollutant as defined under the CAA, and that EPA has the authority to regulate GHG emissions. In 2009 EPA adopted its Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the CAA (Endangerment Finding). EPA found that atmospheric concentrations of GHGs endanger the public health and welfare within the meaning of Section 202(a) of the CAA due to higher likelihood of heat waves, wildfires, droughts, sea level rise, and higher-intensity storms.

State

California Air Resources Board (CARB). CARB is the state agency with primary responsibility for California’s air quality programs.

Criteria Air Pollutants. CARB is responsible for preparing and enforcing the federally-required SIP to achieve and maintain NAAQS, as well as the California Ambient Air Quality Standards (CAAQS), which were developed as part of the California Clean Air Act (CCAA) in 1988. CAAQS for criteria pollutants equal or surpass NAAQS and include other pollutants for which there are no NAAQS (**Table 4.4-5**).

CARB is also responsible for assigning air basin attainment and nonattainment designations in California. Air basins are designated as being in attainment if the levels of a criteria air pollutant meet the CAAQS for the pollutant, and are designated as being in nonattainment if the concentration of a criteria air pollutant exceeds the CAAQS.



Table 4.4-5 California and National Air Quality Standards

Pollutant	Average Time	California Standards ¹	National Standards ²
		Concentration ^{3,4}	Primary ^{3,5,7}
Ozone (O ₂) ⁸	1 hour	0.09 ppm (180 µ/m ³)	–
	8 hours	0.070 ppm (137 µ/m ³)	0.070 ppm (137 µ/m ³)
Respirable particulate matter (PM ₁₀) ⁹	24 hours	50 µ/m ³	150 µ/m ³
	Annual arithmetic mean	20 µ/m ³	–
Fine particulate matter (PM _{2.5}) ⁹	24 hours	–	35 µ/m ³
	Annual arithmetic mean	12 µ/m ³	12.0 µ/m ³
Carbon monoxide (CO)	1 hour	–	35 ppm (40 µ/m ³)
	8 hours	9.0 ppm (10 µ/m ³)	9 ppm (10 µ/m ³)
	8 hours (Lake Tahoe)	6 ppm (7 µ/m ³)	–
Nitrogen dioxide (NO ₂) ¹⁰	1 hour	0.18 ppm (339 µ/m ³)	100 ppb (188 µ/m ³)
	Annual arithmetic mean	0.030 ppm (57 µ/m ³)	0.053 ppm (100 µ/m ³)
Sulfur dioxide (SO ₂) ¹¹	1 hour	0.250 ppm (655 µ/m ³)	75 ppb (196 µ/m ³)
	3 hours	–	–
	24 hours	0.04 ppm (105 µ/m ³)	0.14 ppm (for certain areas) ¹⁰
Lead ^{12,13}	30-day average	1.5 µ/m ³	–
	Calendar quarter	–	12 µ/m ³ (for certain areas) ¹²
	Rolling 3-month average	–	0.15 µ/m ³
Visibility reducing particles ¹⁴	8 hours	See footnote 13	–
Sulfates	24 hours	25 µ/m ³	–
Hydrogen sulfide	1 hour	0.03 ppm (42 µ/m ³)	–
Vinyl chloride ¹²	24 hours	0.01 ppm (26 µ/m ³)	–

- California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24 hour standard is attained when 98% of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
- Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
- On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except



that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Source: California Air Resources Board (ARB). Ambient Air Quality Standards, October 1, 2015. Data compiled by Ascent Environmental 2016.



While CARB is the oversight agency responsible for regulating statewide air quality, implementation and administration of the CAAQS are delegated to the 35 regional air pollution control districts and air quality management districts. These districts have been created for specific air basins, and have principal responsibility for developing plans to comply with the NAAQS and the CAAQS; developing control measures for non-vehicular sources of air pollution necessary to achieve and maintain NAAQS and CAAQS; implementing permit programs established for the construction, modification, and operation of air pollution sources; enforcing air pollution statutes and regulations governing non-vehicular sources; and developing employer-based trip reduction programs. The Ventura County Air Pollution Control District (VCAPCD) is the designated regional air district for Ventura County.

Toxic Air Contaminants/Hazardous Air Pollutants.³⁴ TACs in California are regulated primarily through the Tanner Air Toxics Act (AB 1807 of 1983) and the Air Toxics Hot Spots Information and Assessment Act (AB 2588 of 1987). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. To date, CARB identified more than 21 TACs and adopted EPA's list of HAPs as TACs. Once a TAC is identified, CARB then adopts an airborne toxics control measure for sources that emit that particular TAC. If a safe threshold exists for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If no safe threshold exists, the measure must incorporate best available control technology for toxics to minimize emissions.

The Air Toxic Hot Spots Information and Assessment Act requires that existing facilities that emit toxic substances above a specified level prepare an inventory of toxic emissions, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

Recent milestones include the low-sulfur diesel fuel requirement, and tighter emissions standards for heavy-duty diesel trucks (effective in 2007 and subsequent model years) and off-road diesel equipment (2011) nationwide. Over time, replacing older vehicles will result in a vehicle fleet that produces substantially lower levels of TACs than under current conditions.

Mobile-source emissions of TACs (e.g., benzene, 1-3-butadiene, diesel PM) in California have been reduced significantly over the last decade; such emissions will be reduced further through a progression of regulatory measures (e.g., Low Emission Vehicle/Clean Fuels and Phase II reformulated gasoline regulations) and control technologies.

34 <https://www.arb.ca.gov/toxics/toxics.htm>



Recommended Setbacks from Air Toxics Sources. CARB research substantiates the health risks to sensitive populations from exposure to high levels of TACs. CARB has recommended that local jurisdictions adopt land use policies to separate sensitive land uses a minimum of 500 to 1,000 feet from air toxic sources. CARB's recommendations for siting new sensitive land uses for mobile and stationary sources of air toxics is presented in **Table 4.4-6** and published in the Air Quality and Land Use Handbook: A Community Health Perspective. The recommended setback distances are advisory and should not be interpreted as required "buffer zones." CARB recognizes the opportunity for more detailed site-specific analyses and that land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

Table 4.4-6 CARB Recommendations for Siting Sensitive Land Uses

Source Category	Advisory Recommendations
Freeways and high-traffic roads	<ul style="list-style-type: none"> Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.
Distribution centers	<ul style="list-style-type: none"> Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week. Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail yards	<ul style="list-style-type: none"> Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within 1 mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	<ul style="list-style-type: none"> Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.
Refineries	<ul style="list-style-type: none"> Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome platers	<ul style="list-style-type: none"> Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry cleaners using perchloro-ethylene	<ul style="list-style-type: none"> Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with 2 or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. Do not site new sensitive land uses in the same building with perc dry cleaning operations
Gasoline dispensing facilities	<ul style="list-style-type: none"> Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas-dispensing facilities.

Source: California Air Resources Board, Air Quality and Land Use Handbook, Table 1-1, 2005

Executive Order S-3-05.³⁵ Executive Order (EO) S-3-05, signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea level. To combat those

³⁵ <https://www.gov.ca.gov/news.php?id=1861>



concerns, the EO established total GHG emissions targets. Emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80% below the 1990 level by 2050. This EO is binding only on state agencies, and has no force of law for local governments; however, the signing of EO S-3-05 established the initial framework for legislation to reduce GHG emissions in California.

Assembly Bill 32, The California Global Warming Solutions Action of 2006. AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. This reduction is to be accomplished through an enforceable statewide cap on GHG emissions implemented through the California Cap-and-Trade program, along with other regulations and programs to achieve GHG emissions reductions in sectors that are included under the statewide cap.

AB 32 Climate Change Scoping Plan.³⁶ In 2008, CARB adopted its Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 118 million metric tons of carbon dioxide equivalent (MMTCO_{2e}), or approximately 22%, from the state's projected 2020 emission level of 545 MMTCO_{2e} under a business-as-usual (BAU) scenario. The Scoping Plan reapproved by CARB in 2011 includes the Final Supplement to the Scoping Plan Functional Equivalent Document (FED), which further examined various alternatives to Scoping Plan measures. The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the state's GHG inventory.

Executive Order B-30-15.³⁷ In 2015 Governor Brown signed EO B-30-15 to establish a new GHG reduction target of 40% below 1990 levels by 2030, as well as increased statewide efforts to address the need for climate change adaptation measures by state agencies. This EO aligned California's GHG reduction targets with those of leading international governments such as the 28-nation European Union, which adopted the same target in 2014. California is on track to meet or exceed its legislated target of reducing GHG emissions to 1990 levels by 2020, as established in AB 32.

SB 32 and AB 197 of 2016. In 2016 Governor Brown signed SB 32 and AB 197, which extend California's GHG reduction programs beyond 2020. SB 32 amended the *California Health and Safety Code* to include §38566, which contains language to authorize CARB to achieve a

³⁶ <https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>

³⁷ <https://www.gov.ca.gov/news.php?id=18938>



statewide GHG emissions reduction of at least 40% below the AB 32 goal of 1990 levels by 2020 by no later than December 31, 2030.³⁸

SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the state's continuing efforts to pursue the long-term target expressed in EOs S-3-05 and B-30-15 of 80% below 1990 emissions levels by 2050. SB 32 is contingent upon AB 197,³⁹ which grants the State Legislature stronger oversight over CARB's implementation of its GHG reduction programs.

California Health and Safety Code §38562.5 requires that CARB consider social cost when adopting rules and regulations to achieve emissions reductions, and prioritize reductions at large stationary sources and from mobile sources. Section 38562.7 requires that each Scoping Plan update identify the range of projected GHG and air pollution reductions and the cost-effectiveness of each emissions reduction measure.

Senate Bill 375 of 2008. The Sustainable Communities and Climate Protection Act of 2008 aligns regional transportation planning efforts, regional GHG emission reduction targets for cars and light trucks, land use planning, and regional housing needs assessments. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS), which integrates regional land use and transportation planning within an MPO's Regional Transportation Plan (RTP).⁴⁰

SB 375 requires CARB, in consultation with MPOs, to provide each region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every 8 years, but can be updated every 4 years if advancements in emissions technologies affect the reduction strategies to achieve the targets.

Ventura County is within the Southern California Association of Governments (SCAG) region, which also includes Los Angeles, Orange, San Bernardino, Riverside, and Imperial counties. In April 2016, SCAG adopted its 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (see discussion below).

Senate Bill 97 of 2007. SB 97 directed the California Natural Resources Agency (CNRA) to adopt amendments to the California Environmental Quality Act (CEQA) Guidelines related to analysis of GHG emissions. The Amendments became effective on March 18, 2010. CEQA allows lead agencies to analyze and mitigate the significant effects of GHG emissions at a

38 https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32

39 https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB197

40 <https://www.arb.ca.gov/cc/sb375/sb375.htm>



programmatic level, such as in a general plan, or as part of a separate plan (e.g., a climate action plan) to reduce GHG emissions (CEQA Guidelines §15183.5).

California Building Efficiency Standards (Title 24, Part 6). Buildings in California are required to comply with California's Energy Efficiency Standards for Residential and Nonresidential Buildings found in Title 24, Part 6 of the California Code of Regulations. The standards are updated on an approximately 3-year cycle to allow consideration of new energy-efficient technologies and methods. The 2016 Title 24 standards went into effect on January 1, 2017. The City of Santa Paula adopted these standards as part of Municipal Code Title XV in January 2017.

CAPCOA Model Policies for Greenhouse Gases in General Plans. In 2009 the California Air Pollution Control Officers Association (CAPCOA) prepared a white paper that presented model policies for addressing GHG emissions in general plans.⁴¹ Model language is provided in nine major categories: GHG reduction planning; land use and urban design; transportation; energy efficiency; alternative energy; municipal operations; waste reduction and diversion; conservation and open space; and education. The document is intended to be a resource for local governments and is not mandatory.

Regional

Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG is the federally designated Metropolitan Planning Organization (MPO) for Ventura, Los Angeles, Orange, Riverside, San Bernardino, and Imperial counties. In April 2016, SCAG adopted its 2016-2040 RTP/SCS,⁴² the region's transportation and sustainability investment strategy for protecting and enhancing the region's quality of life and economic prosperity. The RTP/SCS is expected to help California reach its GHG reduction goals, with an 8% reduction in GHG emissions per capita by 2020, an 18% reduction by 2035, and a 21% reduction by 2040 compared with 2005 levels. The RTP/SCS is based on the growth assumptions contained in the general plans of cities and counties in the region.

Ventura County Air Pollution Control District (VCAPCD). VCAPCD, the lead air quality regulatory agency for Ventura County, works to improve air quality through comprehensive programs of planning, regulation, enforcement, technical innovation, incentive programs, and promotion of the understanding of air quality issues. VCAPCD also inspects stationary sources to ensure they abide by permit requirements, responds to citizen complaints,

⁴¹ <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-ModelPolicies-6-12-09-915am.pdf>

⁴² <http://scagrtpscs.net/Pages/default.aspx>



monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by state and federal air quality laws.

Ventura County Air Quality Management Plan (AQMP).⁴³ The VCAPCD Board adopted the 2016 AQMP on February 14, 2017. The AQMP presents Ventura County's strategy for attaining federal ozone standards. The AQMP was prepared to satisfy federal CAA planning requirements for areas designated as serious federal 8-hour ozone nonattainment areas. Photochemical air quality modeling and related analyses, including a Weight of Evidence assessment conducted for the 2016 AQMP, indicate that Ventura County will attain the 2008 federal 8-hour ozone standard by 2020 using local, state, and federal clean air programs. Similarly, the required Reasonable Further Progress (RFP) demonstration shows that Ventura County will achieve the required annual incremental emissions reductions for the purpose of ensuring attainment by the attainment year.

VCAPCD Air Quality Assessment Guidelines.⁴⁴ The Ventura County Air Quality Assessment Guidelines (Guidelines) is an advisory document that provides a framework and methodology for preparing air quality evaluations for environmental documents. The Guidelines were first adopted by the Ventura County Air Pollution Control Board in 1989 and last revised in 2003. While use of the Guidelines is not mandated by VCAPCD, all cities in Ventura County have chosen to use them when assessing air quality impacts under CEQA.

Central to the Guidelines are specific air emissions significance criteria for determining whether a proposed development project would have a significant adverse impact on air quality. The Guidelines also provide mitigation measures that may be useful for mitigating the air quality impacts of proposed projects. Most relevant to Santa Paula's 2040 General Plan update is the Guidelines provision regarding determining the consistency of General Plan amendments with the AQMP. According to Guidelines Section 4.2.2 "Any General Plan Amendment that will result in population growth above that forecasted in the most recently adopted AQMP is inconsistent with the AQMP. It will therefore have a significant cumulative adverse air quality impact." Because the 2016 AQMP is based upon the same growth forecast adopted by SCAG as part of the 2016-2040 RTP/SCS, Santa Paula's 2040 General Plan would be found consistent with the AQMP if it facilitates population growth that would not exceed the level assumed in the RTP/SCS.

43 <http://www.vcapcd.org/AQMP-2016.htm>

44 <http://www.vcapcd.org/environmental-review.htm>



Local

Santa Paula Municipal Code. In 2004 the City Council adopted the Transportation Demand Management (TDM) Ordinance (Title XVI, Chapter 16.108), which includes trip reduction measures that support the Congestion Management Plan (CMP) adopted by the Ventura County Transportation Commission. Among the state-mandated elements of the CMP is a trip reduction and transportation demand management element that promotes alternative transportation methods, such as carpools, vanpools, transit, bicycles, walking, park-and-ride lots, improvement in the balance between jobs and housing, and other strategies, including flexible work hours, telecommuting and parking management programs. These measures help to reduce air pollutant and GHG emissions by reducing vehicle-miles-traveled (VMT).

Chapter 16.42 (Performance Standards) of the Code establishes regulations related to smoke, dust, ash, fumes and odors.

In January 2017 the City Council adopted the 2016 California Energy Code as part of Title XV, Chapter 150 of the Municipal Code.

4.4-2 Thresholds of Significance

Air Quality Thresholds

In accordance with Appendix G of the CEQA Guidelines, the project would have significant impact on regional or local air quality and GHG emission conditions if it would cause any of the following to occur:

- a) Conflict with or obstruct implementation of the applicable air quality plan (Impact AQ/GHG 1)
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (Impact AQ/GHG 2)
- c) Expose sensitive receptors to substantial pollutant concentrations (Impact AQ/GHG 3)
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (Impact AQ/GHG 4)

Greenhouse Gas Thresholds

The Ventura County Air Pollution Control District has not yet adopted any approach to setting a threshold of significance for projects in the area of project GHG emissions.⁴⁵ Therefore, pursuant to CEQA Guidelines §15150, the GHG analysis presented in this EIR incorporates by reference the

⁴⁵ Ventura County APCD, 2016 AQMP Initial Study/Negative Declaration, p. 30



GHG analysis conducted by SCAG for the 2016-2040 RTP/SCS PEIR⁴⁶, which analyzed impacts related to GHG emissions that would be expected to occur under the policies and growth scenario adopted in the RTP/SCS. Because the effects of GHG emissions are global in scale and the proposed Santa Paula 2040 General Plan is consistent with RTP/SCS policies and growth assumptions, the RTP/SCS analysis of GHG impacts appropriately addresses the GHG impacts of the proposed Santa Paula 2040 General Plan.

The RTP/SCS PEIR utilized the following thresholds of significance for the evaluation of GHG impacts:

- The 2016-2040 RTP/SCS would have a significant impact related to GHG emissions if it would:
- Increase GHG emissions compared to existing (2015) conditions (Impact AQ/GHG 5)
- Conflict with SB 375 GHG emission reduction targets (Impact AQ/GHG 6)
- Conflict with AB 32 or other applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs (Impact AQ/GHG 7)

4.4-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts to air quality and GHG emissions expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. Because air quality and GHG are regional in nature, the geographic scope for the analysis of Project impacts is Ventura County as a whole, while the geographic scope for cumulative impacts is the entire SCAG region.

Impact AQ/GHG-1: Conflict with or obstruct implementation of the applicable air quality plan

Impact Discussion

Project Impacts. As noted in the Regulatory Framework above, Santa Paula is located within Ventura County. VCAPCD, the lead air quality regulatory agency for Ventura County, works to improve air quality through comprehensive programs of planning, regulation, enforcement, technical innovation, incentive programs, and promotion of the understanding of air quality issues. VCAPCD also inspects stationary sources to ensure they abide by permit requirements, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by State and Federal air quality laws.

46 SCAG, 2016-2040 RTP/SCS Draft PEIR, Sec. 3.8 (State Clearinghouse No. 2015031035)



The VCAPCD Board adopted the current 2016 AQMP⁴⁷ on February 14, 2017. The AQMP presents Ventura County's strategy for attaining federal ozone standards. The AQMP was prepared to satisfy federal CAA planning requirements for areas designated as serious federal 8-hour ozone nonattainment areas. Photochemical air quality modeling and related analyses, including a Weight of Evidence assessment conducted for the 2016 AQMP, indicate that Ventura County will attain the 2008 federal 8-hour ozone standard by 2020 using local, state, and federal clean air programs. Similarly, the required Reasonable Further Progress (RFP) demonstration shows that Ventura County will achieve the required annual incremental emissions reductions for the purpose of ensuring attainment by the attainment year.

The Ventura County Air Quality Assessment Guidelines (Guidelines) is an advisory document that provides a framework and methodology for preparing air quality evaluations for environmental documents. The Guidelines were last revised in 2003. While use of the Guidelines is not mandated by VCAPCD, all cities in Ventura County have chosen to use them when assessing air quality impacts under CEQA.

Central to the Guidelines are specific air emissions significance criteria for determining whether a proposed development project would have a significant adverse impact on air quality. The Guidelines also provide mitigation measures that may be useful for mitigating the air quality impacts of proposed projects. Most relevant to Santa Paula's 2040 General Plan update is the Guidelines provision regarding determining the consistency of General Plan amendments with the AQMP. According to Guidelines Section 4.2.2 "Any General Plan Amendment that will result in population growth above that forecasted in the most recently adopted AQMP is inconsistent with the AQMP. It will therefore have a significant cumulative adverse air quality impact." Because the 2016 AQMP is based upon the same growth forecast adopted by SCAG as part of the 2016-2040 RTP/SCS, Santa Paula's 2040 General Plan would be found consistent with the AQMP if it facilitates population growth that would not exceed the level assumed in the RTP/SCS. As discussed in **Section 2– Project Description**, the proposed 2040 General Plan is intended to facilitate growth consistent with SCAG's 2016-2040 RTP/SCS and VCAPCD's 2016 AQMP. Consistency with the RTP/SCS is also demonstrated in the analysis presented in **Section 4.11 - Land Use and Planning**. Therefore, pursuant to VCAPCD Guidelines, the proposed General Plan would not conflict with the Ventura County 2016 AQMP. In addition, the General Plan policies and programs listed in **Table 4.4-7** support this consistency finding and would substantially reduce this potential impact to a level that is less than significant.

⁴⁷ <http://www.vcapcd.org/AQMP-2016.htm>



Table 4.4-7 General Plan Policies and Programs That Address Consistency with Air Quality Plans

Policies	Programs
<p>LU 3.3. Diverse housing supply. Provide for a full range of housing types, locations and densities to accommodate the city's share of regional housing needs for all income segments in a manner that:</p> <ul style="list-style-type: none"> - Retains the scale and character of existing neighborhoods; - Facilitates upgrading and infill of underutilized land in existing neighborhoods; - Allows expansion into vacant and underdeveloped lands consistent with infrastructure and environmental constraints; and - Encourages development of high-quality estate homes in designated expansion areas <p>LU 3.5. Compact multi-family development. Encourage multi-family residential development within walking distance of commercial services and public amenities.</p> <p>LU 4.1. Balanced development. Facilitate balanced development consistent with the 2040 RTP/SCS within the existing City limits and the expansion areas subject to the restrictions of the CURB with emphasis on infill development and reuse in accordance with adopted land use regulations and design guidelines. Proposals for annexation should be supported by a fiscal and market analysis demonstrating the feasibility of the proposed development. Where annexation is appropriate, contiguous lands should be developed first and preparation of a Specific Plan will be required. Development in the expansion areas shall be consistent with Table LU-5 of the Land Use Plan.</p>	<p>LU 4.a. Development review. As part of the development review process, assist applicants in demonstrating conformance with applicable standards and design guidelines through the use of checklists, handouts, etc. For proposed developments in the Sphere of Influence and expansion areas, work cooperatively with LAFCO and Ventura County to process annexations as development proposals are reviewed and approved by the City.</p> <p>LU 4.b. General Plan review. Conduct a thorough review of General Plan growth assumptions and policies following the adoption of each 4-year update to the RTP/SCS and make adjustments to land use and infrastructure plans and policies as appropriate.</p> <p>ECR 2.a. Land use planning. Work cooperatively with SCAG to ensure that City's land use plans and regulations are consistent with the RTP/SCS. Avoid locating sensitive receptors near sources of pollutant emissions such as high-volume roadways.</p>

Cumulative Impacts. The SCAG 2016-2040 RTP/SCS PEIR determined that cumulative impacts would be less than significant with regard to conflicts with applicable air quality plans.⁴⁸ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

⁴⁸ SCAG 2016-2040 RTP/SCS DPEIR, p. 3.3-48



Impact AQ/GHG-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard

Impact Discussion

Project Impacts. Ventura County is designated as a “serious” nonattainment area for the federal ozone air quality standard. Air in the county currently exceeds the standard on an average of 14 days per year. The Ventura County AQMP projects continued reductions in air pollutant emissions in the county for the foreseeable future.⁴⁹

The Ventura County Air Quality Assessment Guidelines⁵⁰ include recommended thresholds of significance for evaluating air quality impacts in CEQA documents in Ventura County. Thresholds that have been quantified include the following:

- ROC – 25 pounds/day
- NO – 25 pounds/day
- Fugitive Dust - Violation of an ambient particulate standard

Short-Term Construction Impacts

Construction activities associated with the proposed General Plan would occur over many years and would cause short-term emissions of criteria air pollutants. The primary sources of particulate matter (PM₁₀ and PM_{2.5}) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary source of VOC emissions is the application of architectural coatings and emissions associated with asphalt paving.

Because the proposed General Plan is a long-term policy document and the timing of specific developments is not known, it is not possible to quantify air pollutant emissions associated with construction activity. However, on a citywide basis it is possible that construction emissions could exceed the significance thresholds established in the Ventura County Air Quality Assessment Guidelines.

Proposed 2040 General Plan policies that will help to reduce potential short-term impacts from construction are listed in **Table 4.4-9**. In addition, the control measures, regulations, incentives and smart growth policies established by VCAPCD will also substantially reduce these impacts. However, even with these measures, short-term impacts are considered significant and unavoidable.

49 Ventura County General Plan Draft Background Report, p. 8-2, January 2018

50 <http://www.vcapcd.org/pubs/Planning/VCAQGuidelines.pdf>



Long-Term Operational Impacts

Long-term air emission impacts associated with new development under the proposed General Plan would result from mobile source emissions and use of energy for space heating and cooling, water heating, lighting, landscape maintenance equipment, etc. PM₁₀ emissions would result from motor vehicles (exhaust, tire and brake wear, etc.) and the entrainment of dust into the atmosphere from vehicles traveling on roadways.

SCAG's 2016-2040 RTP/SCS Program EIR⁵¹ analyzed projected criteria pollutant emissions in 2040 based on the adopted RTP/SCS policies and growth forecast compared to existing (2015) emissions in each of the six counties in the SCAG region. As shown in **Table 4.4-8**, projected emissions in 2040 are estimated to be lower than or equal to current emissions for every criteria pollutant in every county in the SCAG region. Since the proposed 2040 Santa Paula General Plan is consistent with RTP/SCS policies and projected growth, it is reasonable to assume that long-term emissions attributable to development under the proposed General Plan would also be less than or equal to current levels. **Table 4.4-9** lists proposed General Plan policies and programs that would substantially reduce long-term impacts to air quality.

Table 4.4-8 Criteria Pollutant Emissions by County – Plan (2040) vs. Existing (2015)

County		(Tons/Day)								
		ROG		NO _x			CO	PM ₁₀	PM _{2.5}	SO _x
		Summer	Annual	Summer	Annual	Winter	Winter	Annual	Annual	Annual
Imperial	Existing	4	4	10	11	11	28	1	0	0
	Plan	2	2	3	3	3	13	1	0	0
	Difference	-2	-2	-7	-7	-7	-14	0	0	0
Los Angeles	Existing	103	101	179	194	190	851	17	9	1
	Plan	21	21	35	37	36	141	14	6	1
	Difference	-81	-80	-144	-157	-154	-711	-3	-3	0
Orange	Existing	28	28	42	46	45	225	5	2	0
	Plan	7	7	8	8	8	44	5	2	0
	Difference	-21	-21	-35	-38	-37	-181	0	-1	0
Riverside	Existing	26	23	66	70	69	183	5	3	0
	Plan	8	7	14	15	15	42	5	2	0
	Difference	-19	-17	-52	-55	-55	-141	0	-1	0
San Bernardino	Existing	32	28	81	86	84	225	6	3	0
	Plan	8	7	22	22	22	46	6	2	0
	Difference	-24	-21	-59	-64	-63	-179	0	-1	0
Ventura	Existing	9	8	12	14	14	70	1	1	0
	Plan	2	2	2	2	2	11	1	0	0
	Difference	-7	-7	-10	-11	-11	-59	0	0	0

SOURCE:

SCAG Transportation Modeling, 2015.

NOTE: Please note that 2012 base year network includes projects in the 2015 Federal Transportation Improvement Program (FTIP) adopted in September 2014 and projects in the 2012 RTP/SCS as last amended in September 2014.

51 SCAG, 2016-2040 RTP/SCS Draft Program EIR, Table 3.3.4-1, p. 3.3-40



Table 4.4-9 General Plan Policies and Programs That Reduce Air Quality Impacts

Policies	Programs
<p>LU 3.8. Buffers between incompatible uses. Ensure that commercial and industrial operations and resource production activities are buffered from sensitive uses in order to avoid significant aesthetic, noise, odor or dust impacts. Appropriate buffers to minimize impacts on adjacent residential property may include decorative walls, landscaped setbacks, restricted vehicular access, proper siting and screening of trash and service areas, and control of lighting.</p> <p>ECR 2.1. Regional coordination. Support the Ventura County Air Pollution Control District in its efforts to improve air quality throughout Ventura County.</p> <p>ECR 2.2. Greenhouse gases. Support state and regional programs intended to reduce greenhouse gas emissions.</p> <p>ECR 2.3. Air toxics. Encourage techniques to reduce the impacts of toxic air contaminants on sensitive uses near high-volume roadways as recommended by the California Air Resources Board.</p>	<p>ECR 2.b. Land use and building codes. Update the City's land use and building codes related to air quality and energy efficiency concurrent with each triennial update of the state codes.</p> <p>ECR 2.c. Development review. As part of the development review process, assist applicants in demonstrating conformance with all applicable air quality regulations and identify appropriate mitigation measures.</p> <p>ECR 2.d. City equipment purchasing. When purchasing City vehicles and equipment, prioritize the selection of low-emission and alternative-fuel vehicles and equipment.</p>

Cumulative Impacts. The SCAG 2016-2040 RTP/SCS PEIR determined that development and infrastructure projects within the SCAG region and surrounding areas would have the potential to result in a significant cumulative impact with regard to violating an air quality standard or contributing substantially to an existing or projected air quality violation due to short-term construction emissions.⁵² Projected long-term emissions are considered to have a less than significant cumulative impact because the Plan is consistent with the local air quality management plans and state implementation plans.

The 2016-2040 RTP/SCS PEIR concluded that cumulative impacts would be less than significant with regard to increasing any criteria pollutant that is in nonattainment under applicable NAAQS or CAAQS because the Plan would not contribute to a net increase in these pollutants and is within the emission budgets set by the AQMPs/SIPs in the SCAG region.⁵³

The proposed 2040 General Plan is consistent with the RTP/SCS; therefore, short-term impacts would be cumulatively considerable while long-term impacts would be less than cumulatively considerable.

⁵² SCAG 2016-2040 RTP/SCS DPEIR, p. 3.3-54

⁵³ SCAG 2016-2040 RTP/SCS DPEIR, p. 3.3-49



Level of Significance

While the proposed 2040 General Plan policies and VCAPCD regulations would substantially reduce short-term impacts associated with development as anticipated in the proposed Plan, these impacts are considered significant and unavoidable. Long-term impacts would be less than significant, however.

Mitigation Measures

Existing City regulations, measures adopted by VCAPCD, and State regulations regarding motor vehicle emissions standards, architectural coatings, and Title 24 energy efficiency standards all help to mitigate air quality impacts, and all feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs.

Level of Significance after Mitigation

Short-term impacts due to construction would be significant and unavoidable. Long-term operational impacts would be less than significant.

Impact AQ/GHG-3: Expose sensitive receptors to substantial pollutant concentrations

Impact Discussion

Project Impacts. Substantial concentrations of air pollutants over a long period of time are linked to adverse health effects especially when located in proximity to sensitive receptors. Certain populations, such as children and the elderly, are more sensitive to air pollution. Sensitive receptors include residential areas, schools, medical facilities, senior centers, and nursing homes.

Sources of substantial pollutant concentrations could include stationary sources, such as industrial and commercial facilities, and mobile sources, such as highways and rail lines. Stationary facilities having the potential to generate substantial sources of emissions require a permit from VCAPCD. Compliance with VCAPCD regulations would substantially reduce pollutant emissions from stationary sources to a level that is less than significant.

The major source of mobile pollutants is diesel particulate matter (DPM) from heavy trucks on highways. DPM emissions have been associated with acute (short-term) and chronic (long-term) health effects, such as the worsening of heart and lung diseases. Elevated levels of ambient particulate matter have also been identified as one of many aggravating factors for childhood asthma. In order to reduce exposure of sensitive populations to DPM, the California Air Resources Board (CARB) recommends that local governments avoid locating new sensitive land uses within 500 feet of freeways.



The SR-126 freeway is the roadway with the highest traffic volumes in Santa Paula. In comparison to other freeways in Southern California, traffic volumes on SR-126 are relatively low. For example, 2014 average traffic volume on SR-126 was approximately 48,000 vehicles/day compared to 134,000 vehicles/day on the SR-101 freeway in Oxnard.⁵⁴ “High-volume roadways” are defined as those that, on an average day, have traffic in excess of 50,000 vehicles in a rural area and 100,000 vehicles in an urban area (*Public Resources Code* §21151.8). Therefore, no high-volume roadways are currently within Santa Paula.

The majority of existing land uses on the south side of SR-126 in Santa Paula are commercial or industrial and are not considered sensitive receptors. However, residential neighborhoods are located adjacent to SR-126 between Shell Road and Steckel Drive. On the north side, a substantial portion of the land within 500 feet of the freeway between Peck Road and 13th Street is developed with existing residential neighborhoods. Although SR-126 is not considered to be a high-volume roadway under State law, sensitive uses near the freeway may still experience elevated levels of air contaminants.

Table 4.4-9 lists proposed General Plan policies and programs that would substantially reduce potential exposure of sensitive receptors to pollutant concentrations along major roadways such as SR-126. However, since sensitive land uses would continue to exist within 500 feet of SR-126 under the proposed Plan impacts would be considered significant and unavoidable.

Cumulative Impacts. The SCAG RTP/SCS PEIR determined that regional growth consistent with the RTP/SCS would result in a significant cumulative impact by exposing sensitive receptors to substantial pollutant concentrations.⁵⁵ The proposed 2040 General Plan is consistent with the RTP/SCS and impacts of the proposed General Plan would be cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs.

⁵⁴ Ventura County General Plan Background Report, Chapter 6, Table 6-12, January 2018

⁵⁵ SCAG 2016-2040 RTP/SCS DPEIR, p. 3.3-54



Level of Significance after Mitigation

Significant impact

Impact AQ/GHG-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people

Impact Discussion

Project Impacts. During construction anticipated under the proposed 2040 General Plan, odors would be generated by vehicles and equipment exhaust as well as during the application of paints and other architectural coatings. These odors would be temporary and dissipate with increasing distance from the construction activity. As a result, construction-related odors would not be expected to have a significant adverse effect on a substantial number of people.

Land uses and operations that are typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Development under the proposed 2040 General Plan would be required to meet all local, State, and Federal regulations related to odor control, including VCAPCD permits. In addition, the General Plan policies listed in **Table 4.4-9** would substantially reduce this potential impact to a level that is less than significant.

Cumulative Impacts. SCAG determined that the RTP/SCS would result in a less than significant cumulative impact with regard to exposing a substantial number of people to objectionable odors.⁵⁶ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

⁵⁶ SCAG 2016-2040 RTP/SCS DPEIR, p. 3.3-49



Impact AQ/GHG 5: Increase in GHG emissions compared to existing conditions (2015)

Impact Discussion

Project Impacts. As part of the 2016-2040 RTP/SCS, SCAG conducted GHG modeling to estimate the change in GHG emissions that would occur by 2040 under the RTP/SCS as compared to base year (2012) levels. GHG emissions result from direct and indirect sources. Direct emissions in the transportation sector derive from fuel combustion in vehicles (i.e., autos, trucks, trains, buses, planes, ships and trains) and natural gas combustion from stationary sources. Indirect sources include off-site emissions occurring as a result of electricity, water consumption and solid waste.

County-level GHG emissions from transportation sources were estimated for the Baseline (2005), Year 2012 (Base Year), Year 2020 with Plan, and Year 2040 with Plan (**Table 4.4-10**). For the purpose of analyzing the 2016-2040 RTP/SCS, the transportation emissions include on-road mobile sources: light and medium-duty vehicles, and heavy-duty trucks.

Table 4.4-10 Greenhouse Gas Emissions from Transportation by County

County	CO ₂ Emissions (tons/day)				
	2005	2012 Base Year	2020 Plan	2040 Plan	2040 Plan vs. 2012 Base Year
Imperial	3,806.6	3,500.7	3,809.5	4,683.4	34%
Los Angeles	133,629.0	120,929.1	106,253.9	78,830.9	-35%
Orange	40,202.9	38,664.1	34,199.4	24,082.5	-38%
Riverside	32,937.6	33,447.2	33,593.3	32,489.4	-3%
San Bernardino	36,397.3	36,690.1	35,595.0	39,019.9	6%
Ventura	10,416.1	9,920.4	8,813.9	6,413.2	-35%
SCAG total	257,389.5	243,151.7	222,265.0	185,519.2	-24%

NOTE:

*Light and medium duty vehicles and heavy duty truck

SOURCE:

SCAG modeling, 2015.

Transportation accounts for the greatest proportion of GHG emissions on a regional and state level. As part of the RTP/SCS, transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand. Across the six counties in the SCAG region, GHG emissions from transportation are projected to decrease by approximately 24% by 2040 compared to existing conditions (2012 Base Year) with the largest reductions in Orange, Los Angeles, and Ventura counties.

To estimate total GHG emissions, emissions from other major sectors including building energy and water-related consumption must be considered. Population and job growth



would induce land use changes (development projects) and increased VMT, and would result in direct and indirect GHG emissions. The RTP/SCS supports sustainable growth through a more compact, infill, and walkable development pattern and focuses growth in existing urban regions and opportunity areas where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would support active transportation options and the use of other transit modes (public transit, carpooling), thereby reducing number of vehicle trips, trip lengths and associated emissions. Land use strategies included in the 2016-2040 RTP/SCS encourage higher-density development in existing urban cores and opportunity areas which would encourage more multi-family and/or mixed-use projects, via higher-density development instead of traditional single-family neighborhoods. Compact development and conservation strategies (e.g., Title 24 building codes, LEED certification), if implemented, would also reduce energy and water consumption.

As shown in **Table 4.4-11 - Greenhouse Gas Emissions Summary for the SCAG Region**, transportation, building and water-related energy is projected to decrease by 18% with the RTP/SCS by 2040 compared to existing conditions (2012 Base Year). These three sectors account for approximately 70% of the total GHG emissions in the SCAG region. Therefore, the RTP/SCS would result in a less than significant impact with respect to GHG emissions compared to existing conditions.

Table 4.4-11 Greenhouse Gas Emissions Summary for the SCAG Region

Area	CO ₂ e Emissions (MMT CO ₂ e per year)			
	2012 Base Year	2020 Plan	2040 Plan	2040 vs. 2012
Transportation ¹	88.75	81.62	67.71	-24%
Building energy ²	53.68	40.51	49.99	-7%
Water-related energy ²	7.41	3.84	4.79	-35%
Total	149.84	125.97	122.49	-18%

1 Light and medium duty vehicles and heavy duty trucks.

2 Scenario Planning Model is a scenario planning tool used for developing scenarios for the Plan during the scenario planning process to compare relative differences among scenarios.

Source: SCAG Modeling, 2015

As discussed under Impact AQ-1 above, the proposed Santa Paula 2040 General Plan is consistent with SCAG's 2016-2040 RTP/SCS. The General Plan policies listed in **Table 4.4-7** as well as the analysis presented in **Section 4.11 - Land Use and Planning** related to the RTP/SCS support this consistency finding.



In addition, the Negative Declaration⁵⁷ adopted by Ventura County APCD for the 2016 AQMP concluded that project-specific GHG impacts would be less than significant.

The proposed 2040 General Plan is consistent with both the RTP/SCS and the AQMP; therefore, potential impacts associated with the proposed General Plan would be less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the RTP/SCS would result in a 22% decline in GHG emissions by 2040 compared to existing conditions; therefore, cumulative impacts would be less than significant.⁵⁸ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

Impact AQ/GHG-6: Potential to conflict with SB 375 GHG emission reduction targets

Impact Discussion

Project Impacts. As described above in the Regulatory Framework, SB 375 requires CARB to develop regional GHG emission reduction targets for cars and light trucks for 2020 and 2035 (compared to 2005 emissions) for each of the State MPOs on a per capita basis. Each MPO is required to prepare an SCS in conjunction with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies as required by SB 375. For SCAG, the targets are to reduce per capita GHG emissions by 8% below 2005 levels by 2020 and 13% below 2005 levels by 2035. Estimating per capita CO₂ emissions requires modeling vehicle miles traveled (VMT) by passenger vehicles and light trucks that emit CO₂ and dividing that number by the total population. SCAG estimates that the per capita 2005

⁵⁷ <http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/DRAFT-2016-AQMP-Init-Study-Neg-Dec-SIGNED.pdf>, p. 30

⁵⁸ SCAG 2016-2040 RTP/SCS PEIR, p. 3.8-41



emissions from cars and light-duty trucks as 23.8 pounds of CO₂ per person per day, as shown in **Table 4.4-12 – SB 375 Analysis**.

Table 4.4-12 SB 375 Analysis

	2005 (Baseline)	2020 (Plan)	2035 (Plan)	2040 (Plan)
Resident population (per 1,000)	17,161	19,060	21,475	22,116
CO ₂ emissions (per 1,000 tons)	204.0*	203.6**	206.0**	203.0**
Per capita emissions (pounds/day)	23.8	21.4	19.5	18.7
% difference from Plan (2020) to Baseline (2005)				-8%*
% difference from Plan (2035) to Baseline (2005)				-18%***
% difference from Plan (2040) to Baseline (2005)				-22%***

NOTE:

* Based on EMFAC2007

** Based on EMFAC2014

***Included off-model adjustments for 2035 and 2040

SOURCE:

SCAG modeling, 2015

Southern California Association of Governments. 5 November 2015. *Item No. 1 Staff Report: 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) – Proposed Major Components*. Available at: <http://www.scag.ca.gov/committees/CommitteeDocLibrary/jointRCPC110515fullagn.pdf>

As shown in **Table 4.4-12**, per capita CO₂ emissions from cars and light-duty trucks (only) are estimated to be 21.4 pounds per day in 2020 with the Plan. The result of the Plan is an 8% decrease in per capita CO₂ emissions from 2005 to 2020 and would achieve the emissions reduction target by 2020 for the region set by SB 375. By 2035, the 2016-2040 RTP/SCS projects 19.5 pounds per day for per capita CO₂ emissions from cars and light duty trucks (only). This represents an approximately 18% decrease in per capita CO₂ emissions from 2005 to 2035. This 18% decrease would exceed the 13% emissions reduction target set by CARB for 2035. Furthermore, although there is no per capita GHG emission reduction target for passenger vehicles set by CARB for 2040, the Regional Plan's GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040. The Plan would result in an estimated 22% decrease in per capita GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 22% decrease in per capita GHG emissions by 2040 (an additional 4% reduction in the five years between 2035 [18%] and 2040 [22%]), the Plan is expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals. As such, the RTP/SCS would not conflict with SB 375 GHG emission reduction targets.

As discussed under Impact AQ/GHG-5 above, the proposed Santa Paula 2040 General Plan is consistent with the RTP/SCS. The General Plan policies listed in **Table 4.4-7** as well as the analysis presented in **Section 4.11 - Land Use and Planning** related to the RTP/SCS support this consistency finding.



In addition, the Negative Declaration⁵⁹ adopted by Ventura County APCD for the 2016 AQMP concluded that project-specific GHG impacts would be less than significant.

The proposed 2040 General Plan is consistent with both the RTP/SCS and the AQMP; therefore, potential impacts associated with the proposed General Plan would be less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the RTP/SCS meets and exceeds SB 375 targets for reducing GHG emissions, resulting in a less than significant cumulative impact.⁶⁰ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to *CEQA Guidelines* Sec 15130(d).

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

Impact AQ/GHG-7: Potential to conflict with AB 32 or other applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs

Impact Discussion

Project Impacts.

AB 32. AB 32 calls for GHG emissions to be reduced to 1990 levels by 2020. CARB's Scoping Plan functions as a roadmap to achieve AB 32 GHG reductions. Because the RTP/SCS focuses on a portion of the transportation sector (i.e., automobiles and light duty trucks pursuant to SB 375) and land use strategies, it does not incorporate implementation of all the AB 32 Scoping Plan strategies that address a broad range of economic sectors. GHG emissions reductions achieved through SCS land use strategies are incorporated into the analysis of the transportation network improvement emissions reductions. The RTP/SCS includes proposed transportation improvements to be integrated and coordinated with proposed land use

⁵⁹ <http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/DRAFT-2016-AQMP-Init-Study-Neg-Dec-SIGNED.pdf>, p. 30

⁶⁰ SCAG 2016-2040 RTP/SCS PEIR, p. 3.8-41



changes that would lead to reduced congestion, reduced VMT, and increased transit, walking, and biking options.

The RTP/SCS alone is not intended to meet the AB 32 emissions reduction targets. By meeting the SB 375 targets, the RTP/SCS has contributed its share, if not greater, to meeting the AB 32 targets. The RTP/SCS has demonstrated that it met and exceeded CARB's targets for greenhouse gas emissions from light duty passenger vehicles for 2020 and 2035, respectively. Specifically, the RTP/SCS shows a GHG emission reduction trajectory that would meet and exceed SB 375 between 2020 and 2040, and beyond. Given that the primary statutory responsibility of the 2016-2040 RTP/SCS is to achieve SB 375 targets, which it does, and the goals set forth by AB 32 are intended to be achieved by all the responsible sectors, the RTP/SCS has successfully contributed its share, if not greater, to meeting the AB 32 target. Additionally, "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32."⁶¹ The compact land use patterns of the RTP/SCS provide more efficient use of water and energy of building operations, among others. This efficiency leads to GHG emissions reduction beyond SB 375 and ensures the region to be on track with AB 32 goals. The assurance for meeting statewide AB 32 goals as outlined in the RTP/SCS as well as in the First Update to the Climate Change Scoping Plan provide a pathway towards meeting the State's long-term GHG emissions reduction goals as set forth in Executive Orders. Therefore, the RTP/SCS is not in conflict with AB 32.

Climate-Related Plans. The 2016-2040 RTP/SCS is in alignment with the goals and objectives set by the county and city climate-related plans. While the specific targets may vary by city/county, the 2016-2040 RTP/SCS assesses consistency with these plans at a programmatic level. Both on the regional and local levels, the climate-related plans lay out efforts to increase energy efficiency, promote energy conservation, design green buildings, reduce VMT, encourage transit-oriented developments, and integrate renewable energies. The RTP/SCS includes integrated transportation and land use strategies to promote active transportation opportunities, compact development, car sharing and ride sourcing, and technology in zero-emission vehicles and neighborhood electric vehicles. Additionally, the 2016-2040 RTP/SCS includes a regional charging network that will increase the number of Plug-in Hybrid Electric Vehicles (PHEV) miles driven on electric power, thereby resulting in a potential to double the electric range of PHEVs and reducing vehicle miles traveled that produce tail-pipe GHG emissions. With aligned goals, the 2016-2040 RTP/SCS is expected to result in a less than significant impact on city and county climate-related plans.

61 California Air Resources Board. May 2014. First Update to the Climate Change Scoping Plan. Available at: <http://www.ourenergypolicy.org/wp-content/uploads/2014/05/cali-scoping.pdf>



Executive Orders. On April 29, 2015, Governor Brown issued Executive Order (EO) B-30-15, which established a new statewide interim GHG emissions reduction target of 40% below 1990 GHG emissions levels by 2030. EO B-30-15 also reiterated the GHG emissions reduction target to reduce emissions to 80% below 1990 levels by 2050 set forth by EO S-3-05 in 2005 by Governor Schwarzenegger. Executive Order B-16-2012 also set the same target for 2050 for the transportation sector: 80% less than 1990 levels. This 2050 target is also incorporated in the CARB Scoping Plan Update.

The following discussion is for illustrative purposes as the Executive Orders are not plans, policies or regulations adopted for the purpose of reducing GHG emissions. As stated above, the 2016-2040 RTP/SCS alone is not intended to meet the AB 32 target or the targets set by EO B-30-15, EO B-16-2012, and EO S-3-05. By meeting the SB 375 targets, the RTP/SCS has successfully contributed its share, if not greater, to meeting the AB 32 target. The 2016 RTP/SCS is currently required to meet the GHG reduction targets set by CARB, i.e., 8% reduction by 2020 and 13% by 2035, both on per capita basis relative to 2005 levels. The GHG reduction trajectory of the 2016-2040 RTP/SCS is consistent with and is more aggressive than the ARB GHG Reduction Target Trajectory for the SCAG region, as the RTP/SCS trajectory shows aggressive GHG reductions between 2020 and 2040. It should be noted that CARB has not established a 2030 target or a 2050 target for the transportation sector to meet the targets set by EO B-30-15, EO B-16-2012, and EO S-3-05. However, the new statewide interim 2030 target set forth under EO B-30-15 suggests that an accelerated timeline would be necessary. To address this new interim 2030 target, the 2016-2040 RTP/SCS accelerates the reduction of GHG emissions such that by 2030, the RTP/SCS is expected to achieve a 14.7% reduction. This reduction would exceed SCAG's current target of 13% by 2035.

In addition, by 2040, the horizon year of the 2016-2040 RTP/SCS, the Plan is expected to achieve a 22% reduction in the GHG emissions of cars and light trucks. The 2016-2040 RTP/SCS has met and exceeded the CARB's targets for 2020 and 2035, respectively. The GHG reduction trajectory of the 2016-2040 RTP/SCS is much more aggressive than CARB's targets between 2020 and 2035. Additionally, the GHG reduction trajectory of the 2016-2040 RTP/SCS beyond 2030 is consistent, if not more aggressive, with the accelerated pace established in the recent Executive Order B-30-15. Further, it should be noted that the goals set forth by AB 32 and the Executive Orders are intended to be achieved by all the responsible sectors. Yet, the 2016-2040 RTP/SCS is demonstrated to contribute the Plan's share, if not more, comparing to the accelerated pace. Therefore, the RTP/SCS itself is not in conflict with the State long-term GHG emissions reduction goals as set forth in Executive Orders.



As discussed under Impact AQ/GHG-5 above, the proposed Santa Paula 2040 General Plan is consistent with SCAG's 2016-2040 RTP-SCS. The General Plan policies listed in **Table 4.4-7** as well as the analysis presented in **Section 4.11 - Land Use and Planning** related to the RTP/SCS support this consistency finding.

In addition, the Negative Declaration⁶² adopted by Ventura County APCD for the 2016 AQMP concluded that project-specific GHG impacts would be less than significant.

The proposed 2040 General Plan is consistent with both the RTP/SCS and the AQMP; therefore, potential impacts associated with the proposed General Plan would be less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that in the event of a worst case scenario, such as other responsible agency implementation activities do not achieve their respective GHG emission reduction goals to the appropriate level, the environmental analysis results in a determination that there would be a potential for a significant cumulative impact requiring the consideration of mitigation measures.⁶³ However, the Negative Declaration⁶⁴ adopted for the Ventura County AQMP concluded that cumulative impacts under the AQMP would be less than significant. The proposed 2040 General Plan is consistent with both the RTP/SCS and the AQMP, and its incremental effects would be less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

62 <http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/DRAFT-2016-AQMP-Init-Study-Neg-Dec-SIGNED.pdf>
p. 30

63 SCAG 2016-2040 RTP/SCS PEIR, p. 3.8-45

64 <http://www.vcapcd.org/pubs/Planning/AQMP/2016/Final/DRAFT-2016-AQMP-Init-Study-Neg-Dec-SIGNED.pdf>
p. 30

4. Environmental Setting and Impact Analysis
4.4 Air Quality and Greenhouse Gas Emissions



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4.5 Biological Resources

4.5-1 Setting

Existing Physical Conditions

The natural biological environment of the city has been highly modified, although some areas still retain significant biological resource value. Much of the area surrounding the city has not been disturbed by urban development and still supports a diversity of plant and animal life. The canyons and hillsides provide habitats that are distinct from those found in the river valley. The creeks and barrancas in the city contribute small partially natural spaces to urbanized neighborhoods.

Vegetation Communities

Vegetation within the Santa Paula planning area can be characterized as agriculture (primarily citrus and avocado), riparian (Santa Clara River, Santa Paula Creek and other large drainages), sage scrub (South Mountain and within canyon areas), oak woodland (scattered patches mostly on north-facing slopes at lower elevations) and grassland (primarily grazed lands). **Exhibit 4.5-1** shows the distribution of vegetation types throughout the Santa Paula area.

Sensitive habitats that have been reported or have the potential to occur within the planning area include the following:

- Southern willow scrub;
- Coast live oak riparian forest;
- Cottonwood-willow riparian forest; and
- Southern walnut woodland.

These habitats are considered to be sensitive by the California Department of Fish and Wildlife Natural Diversity Data Base due to their limited extent and potential for loss. Southern willow scrub occurs within most intermittent streams and larger drainages such as Santa Paula Creek and the Santa Clara River in locations that are frequently scoured by flood flows. Coast live oak riparian forest occurs in patches along drainages with deep soils and dependable groundwater. Cottonwood-willow riparian forest occurs within Santa Paula Creek and the Santa Clara River (and possibly other larger drainages) in areas of dependable groundwater and less frequent flood scouring. Southern walnut woodland is limited in the planning area to the north-facing slopes along State Route 150 near Sulfur Springs. **Exhibit 4.5-2** shows the generalized locations of sensitive vegetation communities.

4. Environmental Setting and Impact Analysis
4.5 Biological Resources

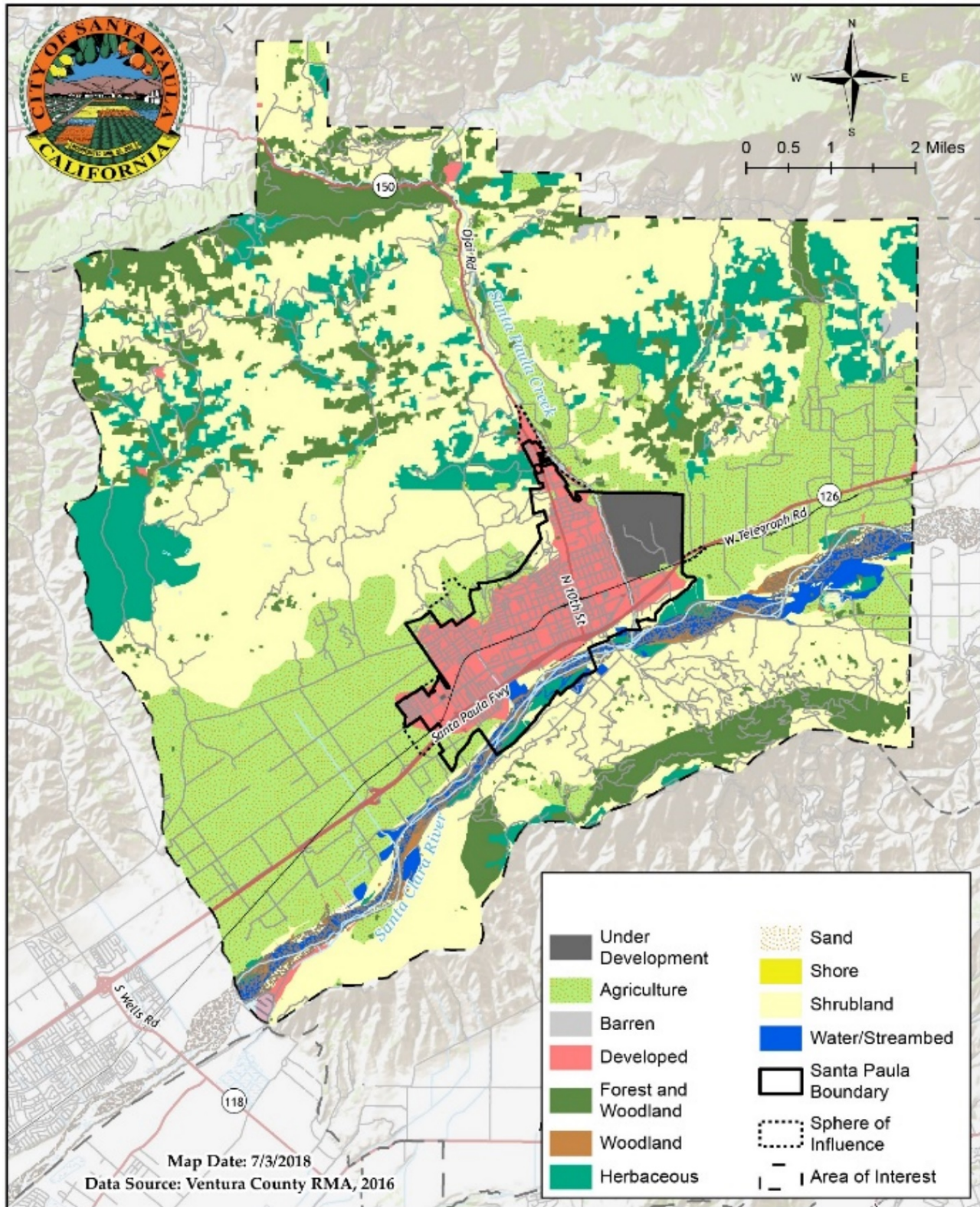


Exhibit 4.5-1 Vegetation Types

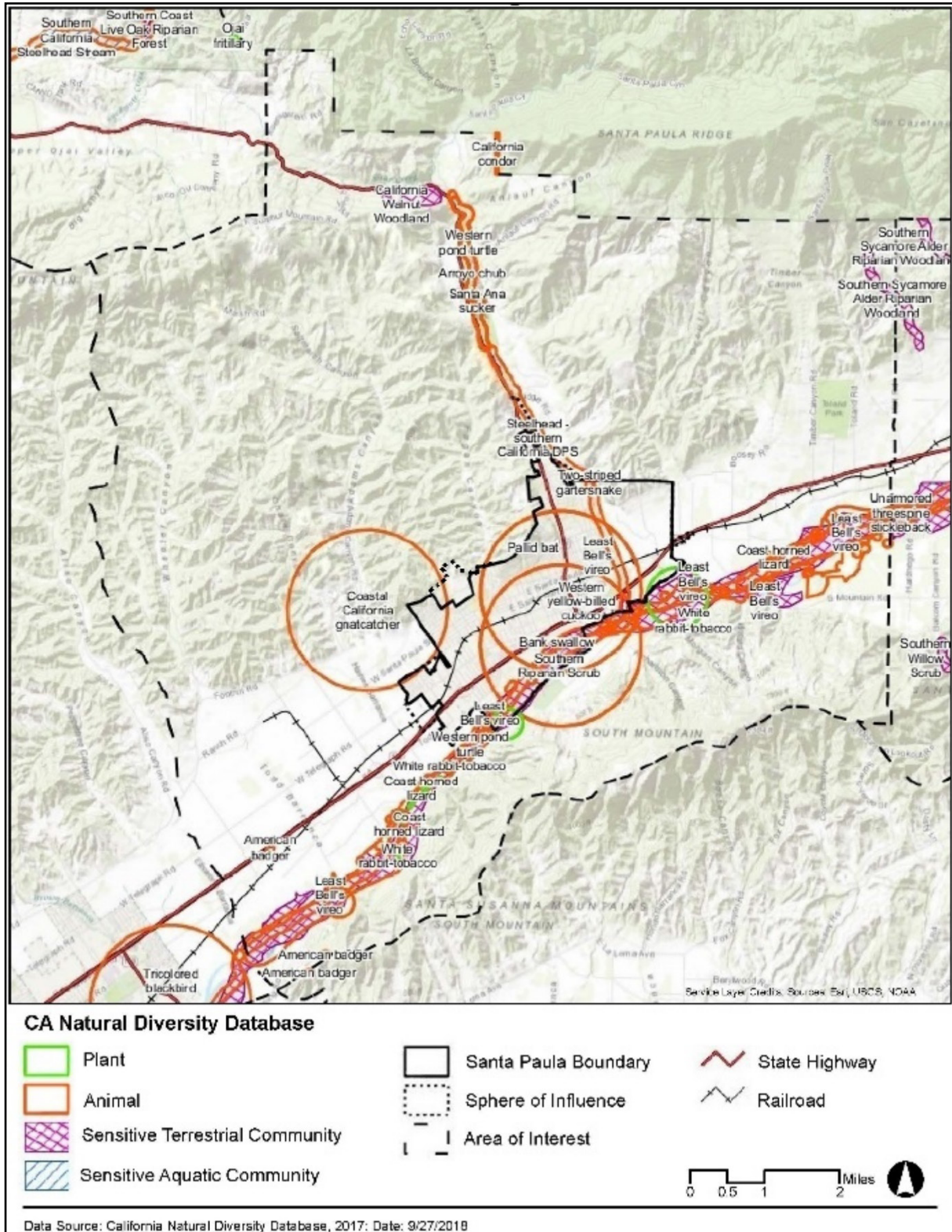


Exhibit 4.5-2 Sensitive Biological Resources



Wildlife

According to the California Natural Diversity Data Base (CNDDB), sensitive wildlife species with recent records of occurrence in the Santa Paula area include Santa Ana sucker (*Catostomus santaanae*), arroyo chub (*Gila orcuttii*), western pond turtle (*Emys marmorata*), two-striped garter snake (*Thamnophis hammondi*), pallid bat (*Antrozous pallidus*), unarmored three-spined stickleback (*Gasterosteus aculeatus williamsoni*), bank swallow (*Riparia riparia*), white-tailed kite (*Elanus leucurus*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), coast horned lizard (*Phrynosoma blainvillii*), south coast garter snake (*Thamnophis sirtalis ssp.*), American badger (*Taxidea taxus*), southwestern willow flycatcher (*Empidonax traillii extimus*), southern steelhead (*Oncorhynchus mykiss*), coastal California gnatcatcher (*Polioptila californica californica*), least bell's vireo (*Vireo bellii pusillus*). **Exhibit 4.5-2** shows the generalized locations of these sensitive wildlife species observed in the Santa Paula area.

Habitat Connectivity and Wildlife Corridors⁶⁵

Habitat connectivity is defined as the degree to which the landscape facilitates or impedes movement of species among habitat areas. Movement is essential to the survival of biota because it allows seasonal migrations, access to resources, dispersal of offspring, genetic diversity, and allows for long-term changes in species' ranges in response to climate change. A high degree of connectivity among habitat types is also important for maintaining biodiversity and ecosystem functions. Loss of habitat connectivity or habitat fragmentation has occurred due to urban sprawl, roads, conversion of wildlands to intensive agricultural uses, installation of fencing that restricts or prevents wildlife movement, and other human and natural influences. Urbanization can result in the following effects on wildlife corridors:

- Decreased abundance and diversity of native species and replacement by non-native species.
- Removal and fragmentation of natural vegetation lowering habitat quality.
- Increased rates of roadkill and habitat fragmentation due to the development of a local road network.
- Spread of exotic plants through disturbance or introduction by humans that results in loss of biodiversity and habitat quality.
- Increase in perennial water which favors non-native aquatic organisms such as bullfrogs, and non-native terrestrial organism such as Argentinean ants which outcompete native species.
- Artificial night lighting which can impair the ability of nocturnal animals to navigate through a corridor.

⁶⁵ This section is based upon the *Ventura County General Plan Revised Public Review Draft Background Report*, Section 8.2, January 2018



- Increased noise, which disturbs or repels many animals and presents a barrier to movement.
- Disruption of the natural fire regime by either increasing the number of fires or suppressing fires that maintain natural ecosystem structure.

Habitat loss and fragmentation are the leading threats to biodiversity worldwide, including within Southern California. Biological diversity benefits both the natural and built environments in several ways. It benefits wildlife and plant species by fostering vigor and resiliency. In the built and agricultural environments, biological diversity provides a variety of pollinators to assure plants and crops persist, provides a variety of wildlife that includes predators that control population levels of high-producing wildlife such as rodents, and provides an interesting natural environment for human exploration.

Within Ventura County, several regional habitat connectivity corridors have been identified by South Coast Wildlands, as part of the South Coast Missing Linkages Project (SCMLP).⁶⁶ These corridors include: 1) connections between the Santa Monica Mountains to the Santa Susana and Sierra Madre mountain ranges (Santa Monica-Sierra Madre Connection); 2) connections between the Sierra Madre to the Castaic ranges (Sierra Madre-Castaic Connection); and (3) linkages provided by the Ventura and Santa Clara Rivers (River Linkages). These regional habitat connectivity corridors identified in Ventura County are referred to as the “Habitat Connectivity Corridors.” A portion of the Sierra Madre-Castaic Connection follows the ridge between Santa Paula and the Ojai Valley, while the Santa Clara River linkage is adjacent to Santa Paula.

These habitat connectivity corridors enable the migration and dispersal of wildlife and plant species, which are critical to the long-term survival of these species in an urbanizing environment. The linkages provide: (1) buffers to mitigate for “edge effects” where dissimilar habitats meet; (2) viable habitat for species needing multiple generations to achieve gene flow through the linkage; (3) needed resources (e.g., food, water, specific habitat, breeding partners, etc.); and (4) needed habitat to allow natural processes to operate and allow for species and natural communities to respond to climate change.

The Santa Monica-Sierra Madre Connection includes the Santa Clara River watershed (Santa Clara River Linkage), which along with the Santa Clara River watershed and Calleguas Creek watershed, contains riparian corridors that provide a significant link between the coastal and inland habitats, and provide habitat for many special-status species (**Exhibit 4.5-3**).

⁶⁶ <http://www.scwildlands.org/>

4. Environmental Setting and Impact Analysis
4.5 Biological Resources

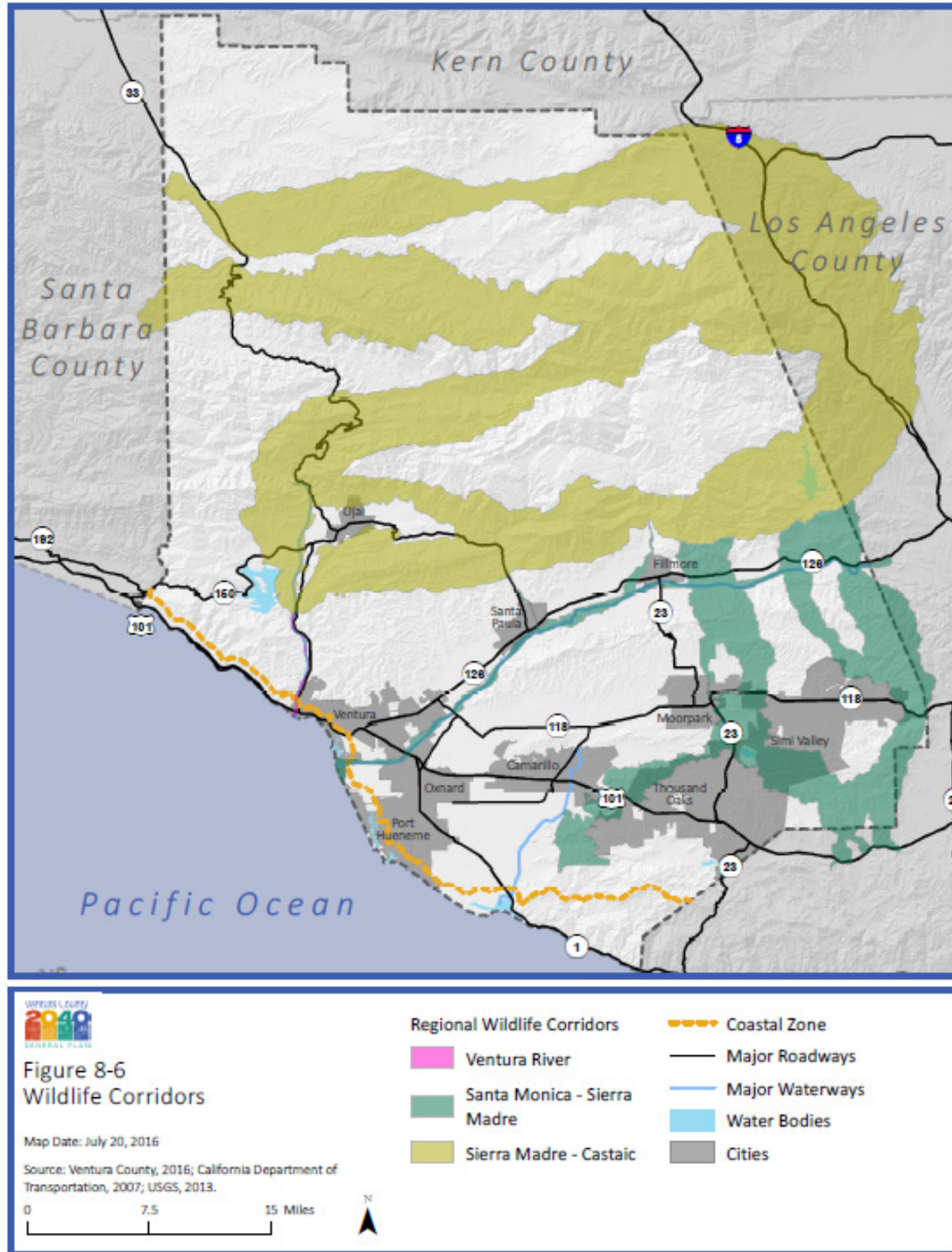


Exhibit 4.5-3 Wildlife Corridors



The Santa Monica-Sierra Madre Connection also includes three north-south linkages that connect the Santa Monica Mountains in the south to the Santa Susana and Topa Mountains (both part of the Transverse Ranges) in the north and cross the Simi Hills and the Conejo Valley as well as the major cities of Thousand Oaks, Simi Valley, Camarillo, and Moorpark.

For most species, U.S. Highway 101 and State Routes (SR) 23, 118, and 126 are barriers between core habitats in the Santa Monica and Sierra Madre Mountains. The direct effects of highways include increased mortality (roadkill), habitat fragmentation, and reduced connectivity. Direct roadkill affects most species, with severe documented impacts on wide-ranging predators, such as mountain lion, in Southern California. Highways also increase the spread of exotic plants, and create noise and vibration that affect the ability of species to communicate, detect prey, or avoid predators. Several existing structures facilitate various degrees of animal movement across these freeways. For example, Caltrans is working with the National Park Service to monitor wildlife movement at several culverts under SR-23, SR-118, and SR-126. Caltrans has begun conducting improvements such as clearing tunnels and culverts and installing wildlife-proof fencing with escape gates to direct animals off the road and through underpasses on SR-23.

The Ventura and Santa Clara River corridors have been identified as important riparian and alluvial vegetation linkages from the Pacific coastal areas east to Los Padres National Forest. These linkages intersect with the Sierra Madre-Santa Monica Connection near the City of Fillmore and Lake Piru (Santa Clara River Connection) and the Sierra Madre-Castaic Connection and Los Padres Forest. Like the chokepoints associated with the Sierra Madre-Santa Monica Connections, these linkages are relatively narrow, but vital for many threatened and endangered wildlife species.

Regulatory Framework

Federal

Endangered Species Act. The purpose of the Endangered Species Act (ESA) of 1973 is to protect and recover imperiled species and the ecosystems upon which they depend. It is administered by the U.S. Fish and Wildlife Service (USFWS) and the Commerce Department's National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon.

Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened.



The ESA provides the regulatory framework for the protection of plants and wildlife (and their associated critical habitats), which are formally listed, proposed for listing, or candidates for listing as endangered or threatened by the USFWS and NMFS. The ESA has the following four major components: 1) provisions for listing species, 2) requirements for consultation with the USFWS and/or NMFS, 3) prohibitions against “taking” of listed species, and 4) provisions for permits that allow incidental “take.” Specifically, Section 9 of the ESA prohibits the “taking” of federally listed wildlife. Taking is defined by the ESA as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct.” For plants, this statute pertains to removing, possessing, maliciously damaging, or destroying any endangered plant on federal land and removing, cutting, digging-up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law (16 U.S. Code [USC] 1538). Under section 7 of the ESA, federal agencies are required to consult with the USFWS and/or NMFS if their actions, including permit approvals or funding, could adversely affect an endangered species (including plants) or its critical habitat. Through consultation and the issuance of a Biological Opinion, the USFWS and/or NMFS may issue an incidental take statement allowing take of the species that is incidental to another authorized activity provided the action will not jeopardize the continued existence of the species. Section 7 consultation would be triggered if a particular project affects wetlands or waters of the U.S., requiring the U.S. Army Corps of Engineers (USACE) to issue a 404 permit. Section 10 of ESA provides for issuance of incidental take permits to private parties provided a Habitat Conservation Plan is developed.

Migratory Bird Treaty Act. The Migratory Bird Treaty Act (MBTA) (16 [U.S.C. 703 et seq.], 50 Code of Federal Regulations (CFR) Part 10, implements international treaties between the U.S. and other nations devised to protect migratory birds, any of their parts, eggs and nests from a variety of activities such as hunting, pursuing, capturing, killing, selling and shipping, unless expressly authorized in the regulations or by permit. With a few exceptions, most birds are considered migratory under the MBTA.

Disturbances that cause nest abandonment and/or loss of reproductive effort or loss of habitat upon which these birds depend would be in violation of the MBTA. The regulations governing migratory bird permits include 50 CFR part 13 General Permit Procedures and 50 CFR part 21 Migratory Bird Permits.

Bald and Golden Eagle Protection Act. The Bald and Golden Eagle Protection Act (BGEPA) regulates take, possession, sale, purchase, barter, transport, import and export of any bald or golden eagle or their parts (e.g., nests, eggs, young) unless allowed by permit (16 U.S.C. 668(a); 50 CFR 22). *Take* is broadly defined to include shoot, wound, kill, capture, collect, molest, or disturb.



Clean Water Act. The Clean Water Act's (CWA) purpose is to "restore and maintain the chemical, physical, and biological integrity of the nation's waters." Section 404 of the CWA prohibits the discharge of dredged or fill material into "waters of the U.S." without a permit from the USACE (33 U.S.C. 1344). The definition of waters of the U.S. includes rivers, streams, estuaries, the territorial seas, ponds, lakes and wetlands (33 CFR Part 328.3). Wetlands are defined as those areas "that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3 7b). EPA also has authority over wetlands and may override a USACE permit. Substantial impacts on wetlands may require an individual permit. Projects that only minimally affect wetlands may meet the conditions of one of the existing Nationwide Permits.

Section 401 of the CWA (33 U.S.C. 1341) requires an applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the U.S. to also obtain a water quality certification from the state in which the discharge originates. The discharge is required to comply with applicable water quality standards. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is issued by the State Water Resources Control Board and its nine Regional Water Quality Control Boards (RWQCBs). Required RWQCB certification would be under the jurisdiction of the Los Angeles RWQCB for southern portions of Ventura County, including Santa Paula.

State

California Endangered Species Act. The California Endangered Species Act (CESA) of 1970 (California Code of Regulations [CCR] Title 14, Sections 670.2 and 670.51), as amended, is administered by the California Department of Fish and Wildlife (CDFW) and generally parallels the main provisions of the federal ESA. Section 2080 of the *California Fish and Game Code* prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. *Take* is defined in Section 86 of the *California Fish and Game Code* as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The CESA allows for take incidental to otherwise lawful development projects.

Native Plant Protection Act. The Native Plant Protection Act (NPPA) of 1977 (*California Fish and Game Code* §§1900-1913) was created with the intent to "preserve, protect and enhance rare and endangered plants in this state." The NPPA is administered by the CDFW. The CDFW has the authority to designate native plants as "endangered" or "rare" and to protect endangered and rare plants from take.



California Fish and Wildlife Code §§1600-1603. Streams, lakes, and riparian vegetation, as habitat for fish and other wildlife species, are subject to jurisdiction by the CDFW under §§1600-1616 of the *California Fish and Game Code*. Any activity that will do one or more of the following: 1) substantially obstruct or divert the natural flow of a river, stream, or lake; 2) substantially change or use any material from the bed, channel, or bank of a river, stream, or lake; or 3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a river, stream, or lake generally requires a 1602 Lake and Streambed Alteration Agreement. Removal of riparian vegetation can also require a Section 1602 Lake and Streambed Alteration Agreement from the CDFW.

CDFW reviews proposed actions and, if necessary, submits a proposal for measures to protect affected fish and wildlife resources to the applicant. The final proposal that is mutually agreed upon by the CDFW and the applicant is the Lake and Streambed Alteration Agreement. Often, projects that require a Streambed Alteration Agreement also require a permit from the USACE under Section 404 of the Clean Water Act.

California Fish and Game Code §§3503, 3503.5, and 3800. According to §3503 of the *California Fish and Game Code*, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird (except English sparrow (*Passer domesticus*), rock pigeon (*Columbia livia*), and European Starling (*Sturnus vulgaris*)). Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds-of-prey). Section 3513 essentially overlaps with the MBTA, prohibiting the take or possession of any migratory non-game bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered *take* by the CDFW.

Oak Woodlands Conservation Act. The California Oak Woodlands Conservation Act was enacted in 2001. The Oak Woodlands Conservation Program constituted formal recognition on behalf of California lawmakers that oak woodlands are a vital statewide resource that provide benefits including crucial plant and wildlife habitat, reduced soil erosion, and enhanced water quality. The Oak Woodlands Conservation Act acknowledges that oak woodlands are being removed throughout California. In addition to the legislative effort to protect oak woodlands provided by the Oak Woodlands Conservation Act, the state legislature passed Senate Bill 1334 (Chapter 732, and Statutes of 2004) which required a modification to the Public Resource Code regarding oak woodlands. As of January 2005, the *California Public Resources Code* (§21083.4) required that when a county is determining the applicability of CEQA to a project, it must determine whether that project would result in a conversion of oak woodlands that would have a significant effect on the environment. If such effects (either individual impacts or cumulative) are identified, the law requires that they be mitigated. Acceptable mitigation measures include, but are not limited to, conservation of other oak woodlands through the use of conservation easements and



planting replacement trees, which must be maintained for 7 years. One notable exemption to this law is for the “conversion of oak woodlands on agricultural land that includes land that is used to produce or process plant and animal products for commercial purposes.”

Local

Ventura County Land Conservation Act Guidelines. Ventura County’s Land Conservation Act Guidelines provide an important tool for working with landowners to protect the remaining oak woodlands as well as other important open space and natural communities. In general, the Land Conservation Act (also known as the Williamson Act) allows landowners to qualify for tax incentives to protect agricultural land and open space from being rezoned and subdivided for higher density development. In 2006, the County Board of Supervisors adopted Land Conservation Act Guidelines that created the opportunity for property owners to enter into Open Space/Wildlife Habitat contracts. The main goal of these contracts is to offer tax incentives for landowners to preserve and protect natural habitats, such as wetlands, native grasslands or woodlands; individual species; and/or wildlife corridors.

Santa Paula Municipal Code. The Development Code (Title XVI of the Municipal Code) establishes permit review procedures for proposed development projects. As part of the review process, proposed projects requiring discretionary approval are reviewed for compliance with CEQA and if impacts to biological resources would occur, changes to the project or mitigation measures are imposed to reduce impacts to the extent feasible.

Municipal Code §156.580 et seq. also establishes protection for native oak, sycamore, heritage or historic trees on public or private property or associated with urban development. With limited exceptions, no native oak and sycamore tree, heritage or historic tree, or any other mature tree on public property shall be removed, cut down or otherwise destroyed, unless a tree removal permit has been issued by the city. Where tree(s) are proposed for removal that are associated with a proposal for urban development, the Director, or his or her designee, shall cause an appraisal of the value of said tree(s) to be prepared in accordance with the adopted procedures. The resulting value shall be applied to upgrading the size of tree plantings associated with the project.



4.5-2 Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, biological resource impacts would occur if the Proposed Project would:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (Impact BIO-1)
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service (Impact BIO-2)
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Impact BIO-3)
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (Impact BIO-4)
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Impact BIO-5)
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. *(As noted in the Notice of Preparation [Appendix A] according to the California Department of Fish and Wildlife there are no Regional Conservation Plans located within Ventura County; therefore, this issue is not addressed in this PEIR.)*

4.5-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts to biological resources expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**, page [3-3](#)), while the geographic scope for cumulative impacts is the entire SCAG region.



Impact BIO-1: Substantial adverse effect on a candidate, sensitive, or special status species

Impact Discussion

Project Impacts. Future development under the proposed General Plan could result in significant impacts on sensitive species due to disturbance or removal of the critical habitat of sensitive species during grading, excavation, and construction activities, or permanently from the ongoing operation and/or maintenance. Indirect impacts could result from elevated dust or noise levels, sediment and pollutants in runoff from construction activities, alteration in stream hydrology, or exterior lighting.

Fire clearance or fuel modification zones are typically required for construction within high fire hazard areas. Such clearing could result in the direct loss of oaks and other significant native trees, as well as other native plants. Secondary impacts would include the invasion of non-native plants into the continually disturbed areas, which could then invade adjacent natural open space areas, further reducing habitat values.

As seen in **Exhibit 4.5-2** (page [4.5-3](#)) the most common areas where sensitive species have been sited are along the Santa Clara River, Santa Paula Creek and other smaller drainages, and in the foothills of the Expansion Areas.

Under the proposed General Plan, most of the Santa Clara River channel, as well as the Santa Paula Creek channel are designated *Open Space*. The *Open Space* land use designation is intended to preserve, manage, and protect natural resources, open space land, cultural and historic resources, geologic hazard areas, parks and recreational resources, and scenic resources. The *Open Space* designation would limit allowable uses and maintain natural resources along the channel.

Policies in the proposed General Plan that would reduce potential impacts on special status species from future development are listed in **Table 4.5-1**. These policies and programs would be implemented through the City's development review process and regulatory permitting required by existing Federal and State laws regarding special status species of plants or animals. Although these policies and programs would substantially reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas.



Table 4.5-1 General Plan Policies and Programs That Reduce Impacts to Biological Resources

Policies	Programs
<p>LU 1.3. Natural features. Ensure that new development and infrastructure are designed in a manner that protects the natural features such as barrancas, tree rows, wetlands, ridgelines, and wildlife movement corridors.</p> <p>LU 1.9. Hillside development. Ensure that development in hillside areas occurs in a manner that protects the natural character, environmental resources, aesthetic qualities, public health and safety, and discourage grading and development on land with a slope greater than 30%.</p> <p>LU 1.13. Noise, light and glare. Land uses should be located, designed and managed in a way that minimizes impacts from unwanted noise, light and glare.</p> <p>LU 2.1. Natural resource preservation. Land development should be designed to preserve significant agriculture and natural areas identified in the Environmental and Cultural Resources Element. Development should be directed away from the most productive soils and sensitive natural areas. Where development is allowed near agriculture and natural areas, it should be designed to be compatible with and have minimal adverse impacts upon such areas, such as through the use of buffers.</p> <p>LU 2.2. Expansion areas. Require that development in expansion areas involving canyons or greenbelts provides land for parks, recreation and open space at a ratio of 5 acres per 1,000 people with a minimum of 10% of the total land area dedicated as permanent open space.</p> <p>The following policies and standards are proposed for Adams Canyon Expansion Area:</p> <ul style="list-style-type: none"> - Require dedication of 100 acres for public recreation facilities and 200 acres of passive public open space with all improvements to be paid for by developer. - Development shall be designed and sited to maintain the character of significant open spaces, to maintain views and vistas and to protect natural habitat. - Clustering of development is required to provide a variety of housing types and protect open space, agriculture, and habitat. - Use extensive landscaping, xeriscaping, etc. Forty percent (40%) of lots/development shall be landscaped or natural open space. - Oil seeps shall be contained and buffered. - Locate building pads and develop the sites and roadways with minimized grading and reduced amounts of cut and fill slopes. - Require the inclusion of drainage and flood control improvements designed to be natural in appearance. - Avoid ridgeline development on prominent ridgelines. - Require new lighting that is part of any proposed development to be oriented away from sensitive uses and 	<p>LU 2.a. Development review. As part of the development review process, assist applicants in demonstrating conformance with applicable standards and design guidelines regarding the preservation of significant natural resources through the use of checklists, handouts, etc.</p> <p>ECR 3.a. Development review. As part of the development review process, require applicants to demonstrate conformance with all applicable policies and regulations regarding sensitive biological resources. For new development in or adjacent to natural habitat areas, the following standards shall apply:</p> <ul style="list-style-type: none"> • A biological survey shall be prepared identifying appropriate mitigation measures to minimize impacts on sensitive resources; • Buffer zones of at least 100 feet should be maintained between urban development and sensitive native habitats; • Removal of native trees shall be minimized. When removal cannot be avoided, native trees shall be replaced at a ratio determined by the City in consultation with a qualified biologist. • Loss of native wetland habitat shall be compensated through the development of additional functional wetlands, preferably at the site or elsewhere within the Sphere of Influence. • Revegetation of temporarily disturbed areas shall utilize native plants. • Lighting shall be shielded to avoid spillover into sensitive habitat areas and wildlife corridors; • To minimize impacts to biological resources as a result of fire management practices, vegetation clearing shall be minimized by avoiding development in dense brush and woodlands. Additionally, fire-resistant plants shall be utilized whenever feasible in fuel modification zones, and projects shall contribute to mitigation of cumulative impacts resulting from fuel modification. • Construction scheduling shall consider the sensitive reproductive periods of wildlife and avoid disturbance to natural habitats during critical breeding, nesting/ denning or fledging periods. • Trails shall follow existing paths, fence lines, and previously disturbed areas to the greatest extent feasible, and shall minimize grading and removal of native vegetation. • Recreation facilities shall be located to avoid sensitive biological resources and avoid direct and indirect disturbance of these areas. • Horse hitchracks and bicycle racks shall be located away from sensitive resource areas. Horses should be excluded from wetland and riparian areas. • Wildlife movement corridors shall be designed to direct large animals toward the passageway through a combination of fencing and dense barrier plantings, as well as the



Policies	Programs
<p>shielded to the extent possible to minimize glare and spill over.</p> <p>The following policies and standards are proposed for Fagan Canyon Expansion Area:</p> <ul style="list-style-type: none"> - Development shall be designed and sited to maintain the character of significant open spaces, to maintain views and vistas and to protect natural habitat. - Clustering of development is required to protect open space, agriculture, and habitat. - Use extensive landscaping, xeriscaping, etc. Forty percent (40%) of lots/development shall be landscaped or natural open space. - Oil seeps shall be contained and buffered. - Locate building pads and develop the sites and roadways with minimized grading and reduced amounts of cut and fill slopes. - Require the inclusion of drainage and flood control improvements designed to be natural in appearance. - Avoid ridgeline development on prominent ridgelines. - Require new lighting that is part of any proposed development to be oriented away from sensitive uses and shielded to the extent possible to minimize glare and spill over. <p>ECR 3.1. Protect important native plants and wildlife and their habitat areas. City land use plans and development decisions should protect rare and endangered native plants and wildlife and their habitat, as required by federal and state law, including wetlands, riparian corridors, and native woodlands. Development adjacent to stream/barranca corridors shall minimize removal of vegetation; minimize erosion, sedimentation, and runoff; and provide natural vegetation buffers.</p> <p>ECR 3.2. Exotic invasive species. Exotic invasive species should be removed whenever possible. To control the spread of invasive, non-native plants to natural areas, native plant landscaping shall be used in areas adjacent to natural open space areas.</p> <p>ECR 3.4. Flood control channels. Flood control projects within or adjacent to natural areas shall be designed to minimize biological impacts. Flood control channels shall incorporate natural earthen bottoms and embankments of natural earth stabilized with native vegetation. Biotechnical methods of bank stabilization are environmentally preferable. The use of concreted riprap or large rock is discouraged. Design of the flow channel should account for the natural morphology of the creek. The use of check dams to reduce flow velocities between channel segments may be applicable. The use of loose rock or gabions/rock blankets is discouraged.</p> <p>ECR 3.5. Public awareness. Promote public awareness of the value of natural resources, sound environmental practices, and a healthy environment.</p>	<p>placement of drinking water and vegetative screening for cover. Culverts under roadways shall be sized to allow the passage of wildlife and designed such that daylight is visible at both ends (wildlife will not pass through a culvert unless daylight is visible).</p> <ul style="list-style-type: none"> • Adams Barranca, which presently offers nearly unrestricted wildlife movement from the foothills to the Santa Clara River drainage, shall be maintained in a condition to promote wildlife movement. • Homebuyers in Adams Canyon and Fagan Canyon shall be provided educational literature describing the types of wildlife habitat in which they live, and the appropriate methods of interacting with such animals, including coyotes, deer, mountain lions and various smaller mammals, birds, reptiles and amphibians. Appropriate methods of reducing disturbance to such animals, including lighting, landscaping and fencing methods, shall be addressed. Such literature shall be developed at the expense of the developers of these areas. This requirement shall be included in Specific Plans for expansion areas. <p>ECR 3.b. Santa Clara River Valley Enhancement and Management Plan. Participate in and support the Santa Clara River Valley Enhancement and Management Plan, and facilitate its local implementation.</p> <p>ECR 3.d. Golf courses. New golf courses should be integrated into the natural environment.</p> <p>ECR 3.e. Water recycling facility. Create wetlands using the WRF effluent, if feasible, as a way to provide additional wildlife habitat, further filtration and local groundwater recharge.</p> <p>ECR 3.f. Disaster recovery. Work with state and county agencies in developing recovery and restoration plans after disasters such as fires and floods to restore natural landscapes, habitats, and functioning ecosystems.</p> <p>ECR 7.d. Santa Clara River Enhancement and Management Plan. Support the Santa Clara River Enhancement and Management Plan and facilitate its implementation in Santa Paula.</p> <p>ECR 7.e. Storm drain maintenance and pollution prevention.</p> <ul style="list-style-type: none"> • Ensure that streets, parking lots, parks, and other public areas are routinely cleaned of litter, debris, and contaminant residue. • Coordinate with and support efforts by other organizations or volunteer groups to promote cleanups of parks and public open spaces. Where streets and other common facilities are privately-owned, require property owners or homeowners' associations, as applicable, to remove debris and contaminated residue on a regular basis. • Install and maintain storm drain filtration units for surface water runoff in areas where trash accumulates, such as large parking lots and busy streets.

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4.5 Biological Resources



Policies	Programs
	<ul style="list-style-type: none">• Ensure that City landscape maintenance operations minimize the release of pesticides, fertilizers and other contaminants into storm drains.• Enforce regulations regarding storm drain discharges such as vehicle and equipment wash water, and swimming pools. <p>ECR 7.f. Spill response and enforcement. Develop and implement a Spill Response Plan with procedures for cleanup of accidental spills and illicit discharges into the storm drain system and pursue enforcement actions as necessary.</p> <p>ECR 7.g. Public information. Provide information to residents and local businesses about the importance of storm water pollution prevention.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that incremental impacts of all of the transportation projects and land use strategies included in the 2016-2040 RTP/SCS to biological resources, when considered with related past, present, or reasonably foreseeable, probable future projects in the SCAG region and surrounding Southern California region, would be expected to result in a significant cumulative impact with regards to biological resources because these projects would contribute to an increase in habitat fragmentation and development upon native habitats.⁶⁷ The incremental effects of the proposed 2040 General Plan on sensitive species would be cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs.

Level of Significance after Mitigation

Significant impact

⁶⁷ SCAG 2016-2040 RTP/SCS PEIR, p. 3.4-81



Impact BIO-2: Substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service

Impact Discussion

Project Impacts. The Planning Area includes riparian habitat and other sensitive natural areas, as shown in **Exhibit 4.5-2** (page [4.5-3](#)). Future development under the proposed General Plan has the potential to impact these areas through direct disturbance as discussed under Impact BIO-1 above, and through invasion of exotic species into habitat areas, increased urban runoff containing pollutants, and impacts from increased human activity (such as encroachment into sensitive areas and impacts from increased lighting). Impacts from urban runoff are addressed in **Section 4.10 - Hydrology and Water Quality**. Potential impacts would be substantially reduced through the proposed General Plan policies listed in **Table 4.5-1** above, as well as by provisions of the Municipal Code regarding control of lighting impacts as discussed in **Section 4.2, Aesthetics**. Although these policies and programs together with other requirements in the Municipal Code would substantially reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would be expected to contribute incrementally with related projects in the SCAG region to significant cumulative impacts on state-sensitive plant communities and riparian habitat as a result of an incremental loss of habitat.⁶⁸ The incremental effects of the proposed 2040 General Plan on riparian habitat or other sensitive areas would be cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs.

Level of Significance after Mitigation

Significant impact

⁶⁸ SCAG 2016-2040 RTP/SCS PEIR, p. 3.4-82



Impact BIO-3: Substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means

Impact Discussion

Project Impacts. Several of the natural watercourses in the Planning Area would likely be under the jurisdiction of the USACE as waters of the U.S. and thus subject to the Clean Water Act. Smaller drainages, particularly in the Expansion Areas north of the city, may be considered jurisdictional by the USACE. It is possible that one or more of these drainages may contain wetland features, either now or in the future, depending on annual rainfall.

The proposed 2040 General Plan does not anticipate development in any Federally protected wetlands. However, where such wetlands may occur, they could be impacted by future development or human activities adjacent to or upstream of wetland areas.

Impacts from urban runoff are also addressed in **Section 4.10- Hydrology and Water Quality**. Impacts would be substantially reduced through the proposed General Plan policies and programs listed in **Table 4.5-1** (page [4.5-14](#)) above. The Development Code (Title XVI of the Municipal Code) establishes permit review procedures for proposed developments. As part of the review process, proposed projects requiring discretionary approval are reviewed for compliance with CEQA and if impacts to biological resources could occur, changes to the project or mitigation measures are imposed to reduce impacts to the extent feasible. The policies and programs in the proposed General Plan together with other requirements in the Municipal Code would reduce this impact to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would not be expected to contribute incrementally in the SCAG region to impacts on wetlands and waterways.⁶⁹ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to *CEQA Guidelines* Sec 15130(d).

Level of Significance

Less than significant

Mitigation Measures

None necessary

⁶⁹ SCAG 2016-2040 RTP/SCS PEIR, p. 3.4-71



Level of Significance after Mitigation

Less than significant

Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites

Impact Discussion

Project Impacts. When habitat linkages are too small or narrow, they may collapse ecologically due to encroachment or edge effects. An example is a corridor intended for deer movement that is so narrow that adjacent residential lighting is too bright for deer to tolerate crossing open pools of light. For small mammals, such as rodents and reptiles, habitat linkages need to be sufficiently wide to decrease the predatory effects of domestic dogs and cats associated with suburban development. In general, the larger a link is, the better it functions for the movement of animals and genetic material between major areas of open space.

Development in the Expansion Areas could impact local movement pathways and migratory routes such as Adams and Fagan Barrancas, which provide connections to the Santa Clara River. While the proposed General Plan policies and programs listed in **Table 4.5-1** (page [4.5-14](#)) would substantially reduce this impact, it would remain significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would be expected to contribute incrementally with related projects in the SCAG region to impacts on migratory corridors and nursery sites as a result of an incremental loss of habitat and habitat fragmentation.⁷⁰ Although the policies and programs proposed in the 2040 General Plan would reduce incremental effects on wildlife movement and nursery sites, impacts would be cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs

⁷⁰ SCAG 2016-2040 RTP/SCS PEIR, p. 3.4-82



Level of Significance after Mitigation

Significant impact

Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance

Impact Discussion

Project Impacts. Municipal Code Sec. 156.580 et seq. establishes protection for native oak, sycamore, heritage or historic trees on public or private property or associated with urban development. With limited exceptions, no native oak and sycamore tree, heritage or historic tree, or any other mature tree on public property shall be removed, cut down or otherwise destroyed, unless a tree removal permit has been issued by the city. Where tree(s) are proposed for removal that are associated with a proposal for urban development, the Director, or his or her designee, shall cause an appraisal of the value of said tree(s) to be prepared in accordance with the adopted procedures. The resulting value shall be applied to upgrading the size of tree plantings associated with the project. Any development under the proposed General Plan would be required to comply with this ordinance; therefore, potential conflicts with local policies or ordinances protecting biological resources would be less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would be expected to contribute incrementally with related projects in the SCAG region to conflicts with local policies and ordinances as a result of an incremental net loss of habitat and protected trees and vegetation.⁷¹ Since any development under the proposed 2040 General Plan would be required to comply with the City's existing tree preservation ordinance, incremental effects of implementation of the 2040 General Plan would be less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

⁷¹ SCAG 2016-2040 RTP/SCS PEIR, p. 3.4-83



4.6 Cultural and Tribal Resources

This section describes potential impacts of the proposed 2040 General Plan related to cultural and historic resources within the Santa Paula Planning Area. In this context “cultural resources” includes both pre-historic (archaeological and paleontological) resources as well as historic resources. Tribal cultural resources are also addressed in this section, pursuant to requirements of SB 18 and AB 52. The information provided in this section is based on previous studies including in the Santa Paula General Plan Final EIR, Section 4.9 (1998), the East Area 1 Specific Plan Final EIR, Section 4.12 (2008), the Ventura County 2040 General Plan Background Report Revised Public Review Draft, Chapter 8 (January 2018), and communications with Native American Tribes during the preparation of the 2040 General Plan (see **Appendix B**).

4.6-1 Setting

Existing Physical Conditions

Prehistoric Archaeological Resources

Archaeological resources refer to the material remains (e.g., artifacts, structures, refuse) produced by human beings, whether intentionally or accidentally. These remains often have special significance to Native Americans and ethnic groups.

Santa Paula is within the historic territory of the Chumash Native American group. The Chumash occupied the region from San Luis Obispo County to Malibu Canyon on the coast and inland as far as the western edge of the San Joaquin Valley, and the four northern Channel Islands. They were credited with an extensive and elaborate material culture, trade networks, and social and religious systems. The most important Chumash site in proximity to Santa Paula was the village of Mupu, which was probably located in the vicinity of the confluence of Santa Paula Creek and the Santa Clara River. Mupu appears to have been the largest village for miles around, with a population of around 40 people occupying the village at the time of Spanish contact.

A records search conducted as part of the 1998 General Plan and EIR indicated that no previously recorded prehistoric archaeological sites had been found within the Sphere of Influence. However, eight archaeological sites were recorded adjacent to Santa Paula Creek. Since a substantial portion of the General Plan study area has never undergone a systematic archaeological reconnaissance, and some areas are known to contain prehistoric archaeological resources, the potential for encountering additional archaeological remains within the unsurveyed portions of the Sphere of Influence is considered to be extremely high.



Paleontological Resources

Paleontological resources refer to the fossilized remains of plant and animal life. Scientific study of fossilized life forms preserved in rocks can lead to identification of local paleo-environmental conditions and biological evolutionary trends. In addition, certain fossil remains are only found in isolated outcrops in Ventura County and are therefore of unique scientific interest.

Santa Paula is located in the western Transverse Ranges Province, where major linear geographic features (i.e., mountains, valleys) and the underlying geologic structures (i.e., faults, folds) trend in a dominantly east-west direction. Previous studies have identified the following geologic areas where paleontological resources could be present in the Santa Paula area.

Saugus Formation. The Saugus Formation has yielded fossil remains at a number of sites near Saticoy and in Moorpark and Santa Clarita, and is considered to have a high potential for fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data that could be uncovered as a result of development activities.

Older Alluvium. Older alluvium has yielded fossil remains at a number of sites in Simi Valley and Thousand Oaks. There is at least a moderate potential for scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data that could be uncovered as a result of development activities.

Younger Alluvium. Younger alluvium has yielded fossil remains at several sites in Simi Valley. Correspondingly, there probably is only a moderate potential for scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data that could be uncovered as a result of development-related earth-moving activities at depths greater than about 5 feet below current grade. At depths less than about 5 feet below current grade, there is considered to be a low potential for fossil remains being encountered by earthmoving activities because, at such shallow depths, the younger alluvium probably is too young to contain remains old enough to be considered fossilized.

Stream Channel Deposits. Stream channel deposits are considered too young to contain remains old enough to be considered fossilized. For this reason, uncovering of paleontological resources in stream channel deposits during development-related earthmoving activities would be considered to be of low potential.

Historical Resources

Historical resources are those from the post-European contact period. These resources include historic event or activity sites, historic archaeological sites, standing architecture and other significant properties, and documents and other sources of historical information, and objects of



material culture. Nonmaterial cultural qualities, such as folklore, social organization, and value systems, may also constitute historical resources.

A number of eligible and potentially eligible historic resources exist within the Santa Paula area, and additional buried historic archaeological resources may be present within the Sphere of Influence (SOI). Downtown Santa Paula and adjacent areas contain a wide variety of structural remains reminiscent of a rich agricultural, social, economic, and political heritage. Santa Paula has one of the best collections of historic structures in Southern California. Numerous historic resources related to the founding of the City, and reflecting its growth and development between 1873 and 1945 are located within the present City limits. The development of Santa Paula's historic downtown followed the traditional, pre-World War II pattern, with narrow lots, rear alleyways and one- and two-story buildings with three-part facades constructed adjacent to the front property lines. Although the original structures have often been modified, buildings retain important scale elements and provide visual clues to the original building materials and architectural intent. **Exhibit 4.6-1** shows the locations of historic landmarks in Santa Paula and adjacent areas, while **Table 4.6-1** provides additional information regarding those landmarks.

A Historic Overlay District has been established in the Municipal Code (Chapter 16.33) and is shown on the Zoning Map. In addition, seven potential historic districts (**Exhibit 4.6-2**) are identified in the Environmental and Cultural Resources Element. The Downtown Commercial area contains historic resources including commercial buildings, churches, fraternal halls, clubhouses, and railroad and industrial buildings. The Downtown Residential area of historic resources represents the city's best-preserved section of residential development. Historic resources include the lot pattern, period residences, sheds/garages on alleys, street furniture, parkways, streetlights, stone curbs, sidewalks, and mature landscape features, such as street trees.

Of particular historic importance are the residential areas known as the McKeveatt Heights tract and The Oaks subdivision. The McKeveatt Heights tract of the 1920s is distinguished from the Downtown Residential area by virtue of its elevation, curvilinear street pattern, and architectural character. The architectural styles represented there are primarily late California Bungalows and Period Revivals. The residential subdivision known as The Oaks, developed during the mid-1920s, is characterized by narrow, irregular streets, mature oak trees, river rock walls, and generously sized lots.

A number of ranch buildings and residences dating from circa 1910-20 are located adjacent to and east of the Teague-McKeveatt Ranch, along Orcutt Road and Peres Lane. The following is a summary of known historical resources in the SOI expansion areas, portions of which have been annexed to the City (e.g., East Area 1).

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4.6 Cultural and Tribal Resources

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Draft Program EIR

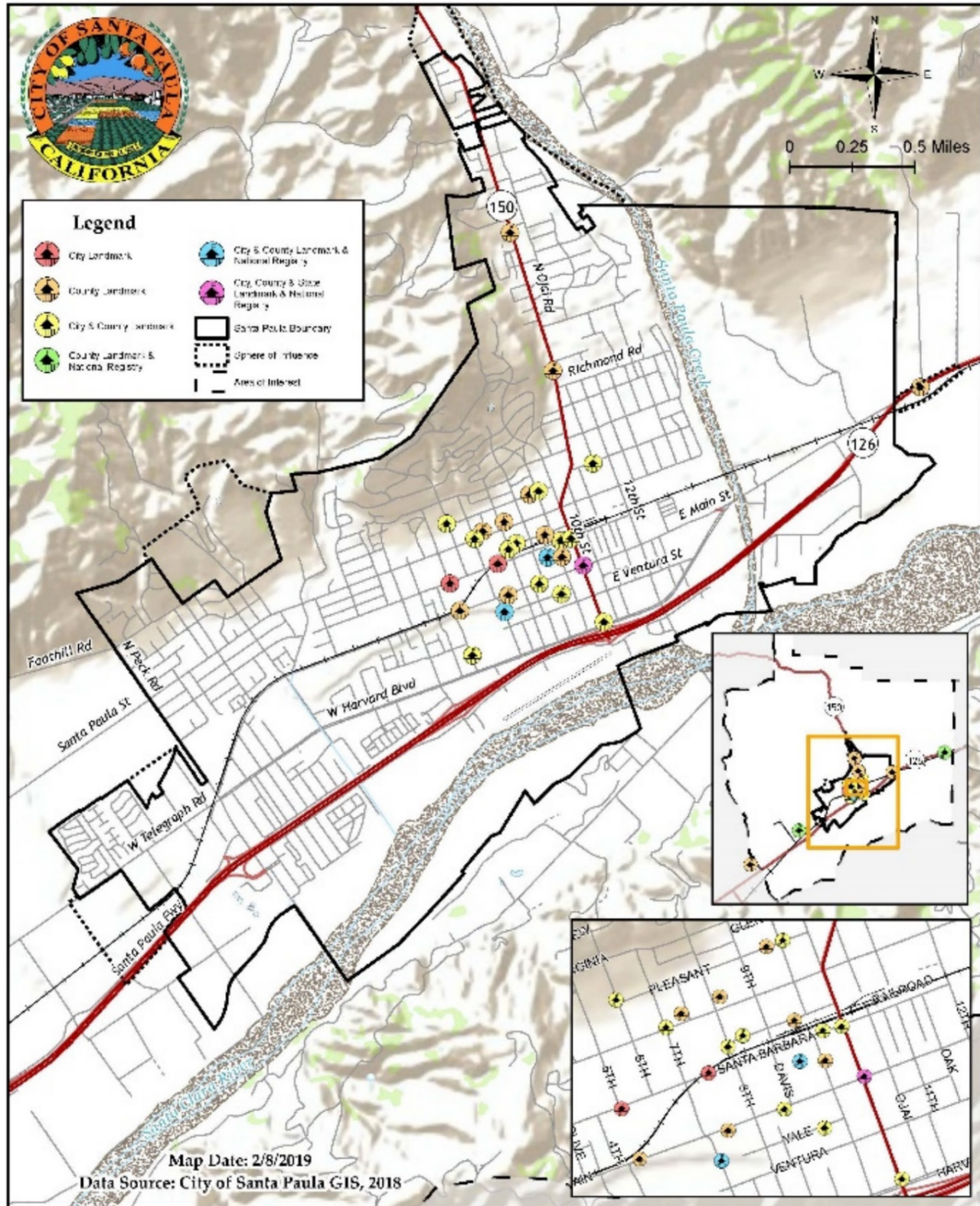


Exhibit 4.6-1 Historic Landmarks

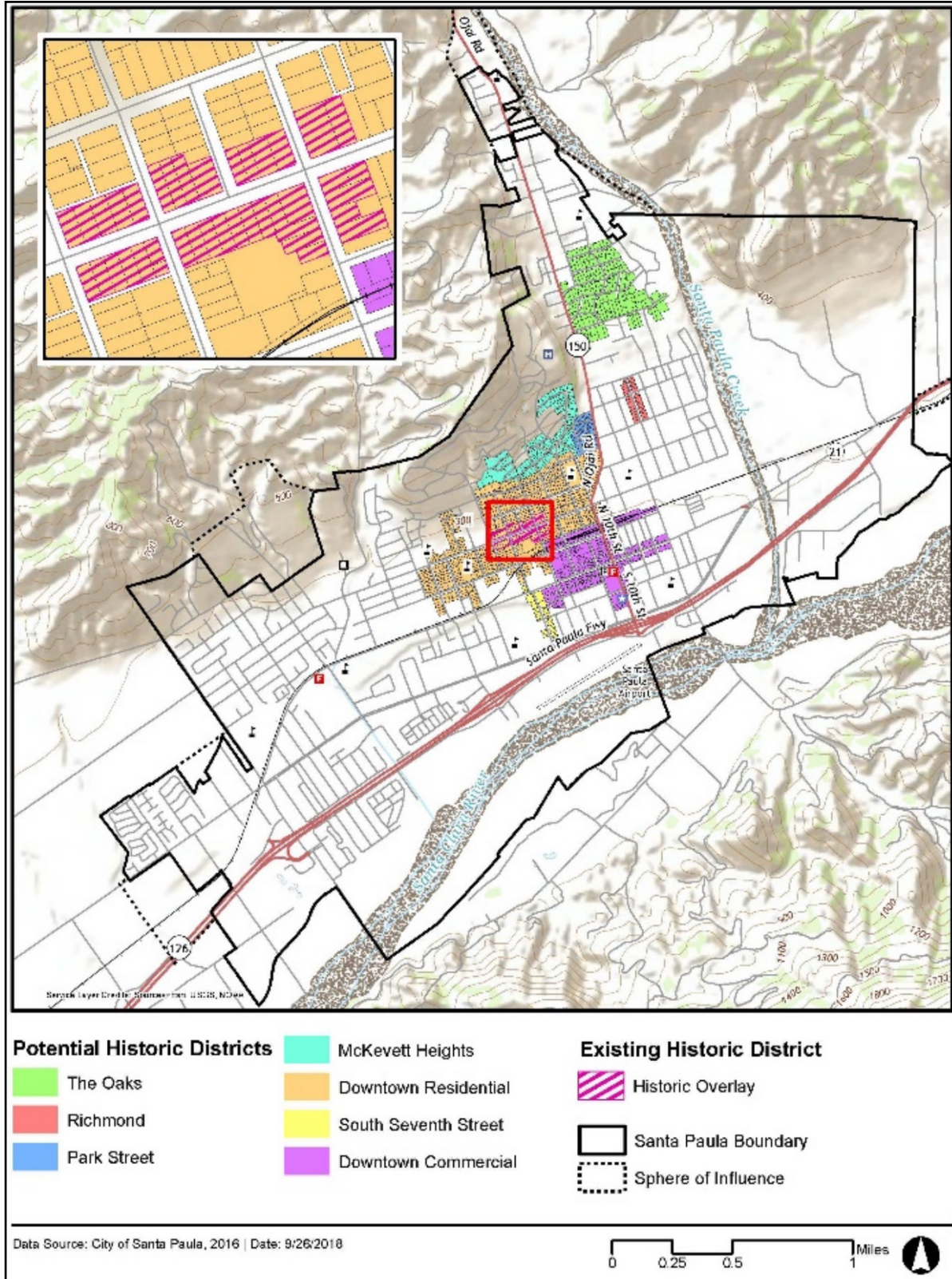


Exhibit 4.6-2 Existing and Potential Historic Districts



Table 4.6-1 Historic Landmarks – City of Santa Paula

City Landmark	County Landmark (within City limits)	Description
No. 1 (1/14/86)	No. 97 (2/19/86)	Santa Paula Union High School – built 1936 404 N. 6 th Street (HPC file) South of Virginia Terrace, north of driveway above cafeteria, east of 5 th Street, west of 6 th Street
No. 2 (6/13/86)	No. 79 (9/12/82)	Moreton Bay Fig Tree – planted July 4, 1879 Southwest corner of 10 th and Santa Barbara Streets (HPC file)
No. 3 (6/13/86)	No. 36 (12/5/77 b)	First Union Oil Company Building – built 1890 aka, California Oil Museum, 1950 National Register No. 86002619, Aug. 1986 State Historical Landmark #996, Feb. 1991 Santa Paula Union Oil Museum (name change 12/93, CDP 88-38)) 1003 E. Main Street
No. 4 (6/13/86)	No. 76 (5/3/82 b)	Ebell Club, aka SP Women's Club – built 1917 aka Santa Paula Theater Center National Register No. 89000949, July 89 125 S. 7 th Street (CDP 86-80)
No. 5 (3/10/87)	No. 65 (7/6/81)	Glen Tavern Hotel (Inn) – built c. 1910 National Register No. 84001225, September 1984 134 N. Mill Street (CDP 87-13)
No. 6 (3/10/87)	No. 23 (4/3/72)	The Southern Pacific Railroad Depot – built 1887 The Depot (houses Chamber of Commerce) 963 E. Santa Barbara Street (CDP 87-13)
No. 7 (4/14/87)	No. 111 (5/4/87)	McKevett School – built 1910 aka North Grammar School 955 E. Pleasant Street (CDP 87-24)
No. 8 (5/12/87)	No. 61 (7/1/80)	Odd Fellows' Town Clock – Installed 1905 868 E. Main Street (CDP 87-25)
No. 9 (5/12/87)	No. 81 (9/1982 b)	First Christian Church – built 1900 829 Railroad Avenue (CDP No. 87-25)
No. 10 (8/11/87)	No. 113 (9/21/87)	The Sheldon House – Charles L. and Nellie, 1900 701 E. Santa Paula Street (CDP 87-59)
No. 11 (2/9/88)	No. 80 (7/12/82 a)	The Rice House – built 1880s 928-930 Yale Street (CDP No. 87-133)
No. 12 (9/25/90)	No. 132 (10/2/90)	Familia Diaz Cafe site – built 1919; rebuilt 1928 245 S. 10 th Street (CDP No. 90-52)
No. 13 (10/31/92)	–	Santa Paula Citrus Fruit Association Building 500 E. Santa Barbara Street (CDP No. 91-48)
No. 14 (2/11/92)	No. 143 (2/1992)	Olive Mann Isbell School – built 1926 221 S. 4 th Street. (CDP No. 91-59)
No. 15 (2/11/92)	No. 142 (2/1992)	Barbara Webster School – built 1925 originally "Canyon School" 1150 Saticoy Street (CDP No. 91-60)
No. 16 (5/14/96)	No. 159 (7/19/99)	Peoples Lumber Co. – built (est.) 1890 216 N. 8 th Street (CDP No. 96-13)



City Landmark	County Landmark (within City limits)	Description
No. 17 (5/14/96)	–	County Fire Station - Santa Paula 735 E. Santa Barbara Street (CDP 95-16)
–	No. 35 (12/5/77 b)	W.L. Hardison Home – built 1884 1226 Ojai Road
–	No. 38 (3/1978 b)	Universalist Unitarian Church – built c.1892 740 E. Main Street
–	No. 39 (8/7/78)	Mill Park 726 Santa Paula/ Ojai Road Highway 150 (west side) at Bedford Street
–	No. 54 (11/5/79 a)	Charles Collins Teague House – built 1924 Teague Mansion and Grounds McKevette Heights Road
–	No. 69 (9/1982)	The Mill – built c. 1890 926 Railroad Avenue (aka 212 N. Mill Street)
–	No. 77 (9/1982 a)	Charles Collins Teague House – built 1900 805 E. Santa Paula Street
–	No. 78 (9/1982 b)	Underwood House – built mid-1890s 715 Santa Paula Street
–	No. 82 (9/1982)	Balcom House – built 1885 933 Pleasant Street
–	No. 83 (9/1982)	Baker House – built 1890 525 E. Main Street
–	No. 84 (9/1982)	Anna M. Logan House – built c. 1888-1890 123 N. Mill Street

County Landmark (outside City limits)	Description
No. 1 (8/5/68 a)	Faulkner House – built 1894-95 National Register No. 91000485, 4/1991 14292 West Telegraph Road
No. 9 (4/21/69 b)	Santa Clara Schoolhouse – built 1896-97 aka “Little Red Schoolhouse” National Register (1980) 20030 E. Telegraph Road
No. 46 (8/15/78 b)	The Tanner Homestead – built c. 1885 aka “Linville” 18492 E. Telegraph Road
No. 114 (11/1987)	James M. Sharp House – built 1890 aka Thille House 11840 Telegraph Road



Santa Clara River Valley-East Area 1 and Area 2. Located between Rancho Santa Paula and Saticoy on the west and Rancho Sespe on the east, this area, sometimes referred to as the Santa Clara District, was opened for homesteading, with the first settlers arriving in the late 1860s. The earliest crops were corn and wheat, followed by fruit trees and watermelons. Beekeeping and sheep raising were also practiced during this period. The ranch contained numerous buildings including residences, barns, sheds and a packing house. The ranch's significance is tied to its associations with C.C. Teague, who has been referred to as the "father of co-operative marketing" of citrus products.

Santa Clara River Valley-West Area 2. This historically agricultural area was first settled in 1867. Some of the Santa Clara Valley's most significant farmhouses in terms of age, architectural styles and historical importance are located along Telegraph Road. In addition, these farmhouses have also maintained their historic agricultural setting.

Adams Canyon. Historically part of Rancho Ex-Mission San Buenaventura, Adams Canyon was primarily developed by the oil industry. The first oil tunnels were drilled into the hillsides in the early 1860s, with later tunnels dug by Union Oil Company during the early 1890s. Many of these tunnels exist today and are significant for their distinctive method of oil extraction. In addition, a number of other oil-related structures such as sheds, derricks, tanks, worker residences and other structures and objects may also remain. The canyon has also been home to ranchers and farmers co-existing with the oil interests.

Fagan Canyon. Historically this canyon was part of Rancho Ex-Mission San Buenaventura. Agriculture has been the principal historic use of the canyon. A small number of residences, barns, and sheds related to the historic agricultural uses of the canyon are known to exist but have not been inventoried.

Known local, state, and federal (NRHP) properties located within the city and the SOI are listed in **Table 4.6-1** (page [4.6-6](#)).

Tribal Cultural Resources

AB 52 expands the government-to-government consultation originally outlined in SB 18 and requires CEQA documents to examine tribal cultural resources, which is a more broadly-defined concept that is more akin to traditional tribal landscapes (i.e., geographic areas or features) than to the specific archaeological sites or artifacts that were considered in the past. Materials related to the City's tribal consultation process are provided in **Appendix B**.

Pursuant to SB 18 and AB 52, the City contacted the California Native American Heritage Commission (NAHC) to request a search of its Sacred Lands File (SLF) and to obtain a list of California Native American tribes whom the City would engage for the purposes of avoiding,



protecting, and/or mitigating impacts on cultural resources. In response, the NAHC stated that a search of the SLF provided negative results; however, the area is sensitive for cultural resources.⁷²

The NAHC provided the City with a list of six contact persons representing three Native American tribes in accordance with SB 18. Of the six tribal representatives contacted by the City, none responded.

Regulatory Framework

Federal

National Historic Preservation Act of 1966 (NHPA). The NHPA establishes the nation's policy for historic preservation and a program for the preservation of historic properties, requiring federal agencies to consider effects to significant historic properties.

Section 106 of the Federal Guidelines. Section 106 of the NHPA states that federal agencies with direct or indirect jurisdiction over federally funded, assisted, or licensed undertakings must take into account the effect of the undertaking on any historic property that is included in, or eligible for inclusion in, the National Register of Historic Places (NRHP), and that the Advisory Council on Historic Preservation (ACHP) and State Historic Preservation Officers (SHPO) must be afforded an opportunity to comment on such undertakings.

National Register of Historic Places (NRHP). The NRHP was established by the NHPA as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, or association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history.
- B. It is associated with the lives of persons who are significant in our past.
- C. It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.

⁷² Native American Heritage Commission, letter to the City of Santa Paula dated August 21, 2017



- D. It has yielded, or may be likely to yield, information important in prehistory or history. Cemeteries, birthplaces, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; and properties that are primarily commemorative in nature are not considered eligible for the NRHP unless they satisfy certain conditions. In general, a resource must be at least 50 years old to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

Antiquities Act of 1906. The Antiquities Act of 1906 provides for the protection of historic, prehistoric, and scientific features located on federal lands. It authorizes the President to designate as National Monuments historic and natural resources of national significance located on federally owned or controlled land.

Native American Graves Protection and Repatriation Act of 1990. The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects.

American Indian Religious Freedom Act of 1978. The American Indian Religious Freedom Act of 1978 states that it is a policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonial and traditional rites.

State

California Environmental Quality Act (CEQA). Pursuant to CEQA, a historical resource is a resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR). In addition, resources included in a local register of historic resources or identified as significant in a local survey conducted in accordance with state guidelines are also considered historic resources under CEQA, unless a preponderance of the facts demonstrate otherwise. According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR, or is not included in a local register or survey, does not preclude a Lead Agency from determining that the resource may be a historic resource as defined in *California Public Resources Code §5024.1*.



CEQA applies to archaeological resources when 1) the archaeological resource satisfies the definition of a historical resource, or 2) the archaeological resource satisfies the definition of a “unique archaeological resource.” A unique archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

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

Assembly Bill 52. Assembly Bill (AB) 52 amended CEQA to specify that a project that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is also a project that may have a significant effect on the environment. AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requests in writing to the lead agency, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. AB 52 specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources.

California Register of Historical Resources. Created in 1992 and implemented in 1998, the California Register of Historical Resources (CRHR) is “an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate properties that are to be protected, to the extent prudent and feasible, from substantial adverse change.”

Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks (CHLs) numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historic resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.



- It is associated with the lives of persons important in our past.
- It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
- It has yielded, or may be likely to yield, information important in history or prehistory.

California Historical Landmarks. California Historical Landmarks (CHLs) are buildings, structures, sites, or places that have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value and that have been determined to have statewide historical significance by meeting at least one of the criteria listed below. The resource must also be approved for designation by the County Board of Supervisors or the City or the Town Council in whose jurisdiction it is located, recommended by the State Historical Resources Commission, or officially designated by the Director of California State Parks. The specific standards in use now were first applied in the designation of CHL No. 770. CHLs No. 770 and above are automatically listed in the CRHR.

To be eligible for designation as a Landmark, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California)
- Associated with an individual or group having a profound influence on the history of California
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder

California Points of Historical Interest. California Points of Historical Interest are sites, buildings, features, or events that are of local significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest (Points) designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historic resource may be designated as both a Landmark and a Point. If a Point is later granted status as a Landmark, the Point designation will be retired. In practice, the Point designation program is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance.



To be eligible for designation as a Point, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (city or county)
- Associated with an individual or group having a profound influence on the history of the local area
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder

Native American Heritage Commission, *Public Resources Code* Sections 5097.9–5097.991.

Section 5097.91 of the *Public Resources Code* (PRC) established the Native American Heritage Commission (NAHC), whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under PRC §5097.9, a state policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. PRC §5097.98 specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a county coroner.

Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

California Native American Graves Protection and Repatriation Act of 2001. Codified in the *California Health and Safety Code* §§8010–8030, the California Native American Graves Protection Act (NAGPRA) is consistent with the federal NAGPRA. Intended to “provide a seamless and consistent state policy to ensure that all California Indian human remains and cultural items be treated with dignity and respect,” the California NAGPRA also encourages and provides a mechanism for the return of remains and cultural items to lineal descendants. Section 8025 established a Repatriation Oversight Commission to oversee this process. The act also provides a process for non-federally recognized tribes to file claims with agencies and museums for repatriation of human remains and cultural items.

Senate Bill 18. Senate Bill (SB) 18 (*California Government Code*, §65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan. SB18 requires public notice to be sent to tribes listed on the Native American Heritage Commission’s SB18 Tribal Consultation list within



the geographical areas affected by the proposed project. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in §5097.9 and §5097.993 of the *Public Resources Code* that may be affected by the proposed adoption or amendment to a general or specific plan.

Health and Safety Code, Sections 7050 and 7052. *California Health and Safety Code* §7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbances must cease, and the county coroner be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

Penal Code, Section 622.5. *California Penal Code* §622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

Mills Act. The Mills Act (*California Government Code* §§50280, et seq.) grants participating local governments the authority to enter into contracts with owners of qualified historic properties who actively participate in the restoration and maintenance of their historic properties while receiving property tax relief. The City of Santa Paula has adopted a Mills Act program (see discussion of Municipal Code Chapter 16.34 below).

Local

Santa Paula Municipal Code. Chapter 16.33 (Historic Landmark Overlay Zoning Districts) and Chapter 16.34 (Historical Property Agreements) of the Development Code (Title XVI of the Municipal Code) include provisions to protect historic buildings and other resources.

Chapter 16.33 establishes an Historic Overlay District for the protection and recognition of historic buildings and neighborhoods with historic merit. The overlay, which is shown as the HD Historical Area on the official Zoning Map, requires special development and design review standards for projects within this identified district.

Chapter 16.34 establishes procedures for implementation of the Mills Act (*Government Code* §§50280, et seq.) and authorizes the City to enter into agreements with owners of historical property for rehabilitation, restoration, preservation, and maintenance in exchange for property tax reductions. One Mills Act contract has been executed in the city for the Glen Tavern Inn.

The Historic Preservation Ordinance (Ordinance No. 816 of 1984) established procedures and design guidelines regarding historic structures districts. The Ordinance created a



Historic Preservation Commission and a Design Assistance Committee. The duties of the Historic Preservation Commission include review and approval of historic landmark nominations, historic district nominations, and applications for alterations to historic landmarks and buildings within historic districts. The primary function of the Design Assistance Committee is to make recommendations to the Historic Preservation Commission.

4.6-2 Thresholds of Significance

Thresholds of significance relative to Cultural Resources are based upon the *CEQA Guidelines*. Please note that the topic of Tribal Cultural Resources, which is listed as Issue XVIII in Appendix G of the Guidelines, is addressed in this section of the EIR. The proposed General Plan would be deemed to have a significant cultural resources impact if its adoption or implementation were to:

- a) Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5 of the CEQA Guidelines (Impact CUL-1)
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines (Impact CUL-2)
- c) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in *Public Resources Code* §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in *Public Resources Code* §5020.1(k), or
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of *Public Resources Code* §5024.1. In applying the criteria set forth in subdivision (c) of *Public Resources Code* §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Impact CUL-3)
- d) Disturb any human remains, including those interred outside of formal cemeteries. (Impact CUL-4)

4.6-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts to cultural, historic and tribal resources expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa



Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact CUL-1: Substantial adverse change in the significance of a historic resource

Impact Discussion

Project Impacts. As shown above in **Exhibit 4.6-1**, **Exhibit 4.6-2** and **Table 4.6-1**, several eligible and potentially eligible historic properties exist within the Santa Paula area and a residential portion of the Downtown area has been formally designated by the City as a historic district. Several informal historic districts have also been identified. Infill development within these areas could affect the historic integrity of existing structures in these areas. These impacts are considered potentially significant. Policies in the proposed 2040 General Plan that would reduce these potential impacts are listed in **Table 4.6-2**. Compliance with the requirements related to historic resources established in these policies and programs together with required compliance with Development Code Chapter 16.33 (Historic Landmark Overlay Zoning Districts) and Chapter 16.34 (Historical Property Agreements) would reduce impacts to a level that is less than significant.

Table 4.6-2 General Plan Policies and Programs that Reduce Impacts to Historic and Cultural Resources

Policies	Programs
<p>ECR 4.1. Encourage cultural and historic preservation. Future land use decisions affecting the community's heritage must recognize the irreplaceable nature of cultural resources. The value of these resources is to be given equal weight with other factors in the decision-making process. Historic preservation is a valuable tool to retain the city's heritage, and activities and development that could damage cultural, archaeological, paleontological, historical or architectural resources should be avoided.</p> <p>ECR 4.2. Historic districts. Encourage the designation of historic districts such as the Downtown.</p>	<p>ECR 4.a. Development review. As part of the development review process, evaluate potential impacts to cultural and historic resources, including tribal cultural resources, and require appropriate mitigation as necessary to avoid significant impacts in conformance with State and Federal law. For proposed discretionary developments that would involve grading or excavation in previously undisturbed areas, require the applicant to provide a cultural resources assessment by a qualified archaeologist identifying potential archaeological and paleontological impacts and establishing appropriate mitigation measures.</p> <p>ECR 4.b. Historic preservation study. Complete a comprehensive historic preservation study for Santa Paula.</p> <p>ECR 4.c. Historic districts. Adopt and implement standards and guidelines for new development and alterations to existing structures within historic districts. Such guidelines shall be developed by a qualified historian, and shall address architecture, landscaping, streets, and hardscape elements within these districts. Standards should address the particular character of individual districts.</p> <p>Continue to implement the Historic Overlay District for portions of the Downtown and surrounding historic neighborhoods. Formally recognize the following historic districts: Downtown Commercial District, Downtown Residential District, South 7th Street, McKeveatt Heights, Park Street, The Oaks, and Richmond Tract. Pursue federal designations for all eligible historic districts under the National Trust for Historic Preservation.</p>



Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts to historic resources.⁷³ However, the proposed policies and programs together with required compliance with the Development Code would reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

Impact CUL-2: Substantial adverse change in the significance of an archaeological resource

Impact Discussion

Project Impacts. Future development projects or public works activities under the proposed 2040 General Plan may involve grading, excavation, or other ground-disturbing activities, or could facilitate public access to archaeological sites, which could disturb archaeological resources. Compliance with the policies and programs in the proposed General Plan (**Table 4.6-2** above), such as requiring a cultural resources assessment for discretionary developments that would involve grading or excavation in previously undisturbed areas, together with existing laws such as SB 18 and AB 52 regarding Native American and tribal cultural resources, would reduce these impacts to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts to archaeological resources.⁷⁴ However, the proposed policies and programs together with required compliance with existing Municipal Code requirements and laws such as SB 18 and AB 52 regarding Native American and tribal cultural resources would reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

⁷³ SCAG 2016-2040 RTP/SCS PEIR, p. 3.5-46

⁷⁴ SCAG 2016-2040 RTP/SCS PEIR, p. 3.5-46



Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

Impact CUL-3: Substantial adverse change in the significance of a tribal cultural resource

Impact Discussion

Project Impacts. According to the NAHC no known tribal cultural resources have been identified in the Planning Area.⁷⁵ However, NAHC indicated that the Planning Area is sensitive for cultural resources. Therefore, it is possible that future land use and development as anticipated by the proposed General Plan could affect tribal cultural resources as a consequence of grading or other ground-disturbing activities, or by introducing increased human activity. The impacts of such activities would be considered significant if they were to cause a substantial adverse change to the resources as defined by CEQA Guidelines §15064.5.

As noted in **Appendix B**, the City obtained a list of tribes having traditional lands or cultural places in Santa Paula from the Native American Heritage Commission. Letters were sent to those tribal representatives; however, no requests for consultation were received.

Policies and programs contained in the proposed 2040 General Plan (**Table 4.6-2** above) together with required compliance with State and Federal laws would avoid or substantially reduce potential impacts to any tribal cultural resources that may be encountered in the future, and would support consultation with tribal representatives regarding future projects to ensure that tribal cultural resources are protected. These General Plan policies and programs would substantially reduce potential impacts to tribal cultural resources to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts to tribal cultural resources.⁷⁶ However, the proposed policies and programs together with required compliance with existing laws such as SB 18

⁷⁵ Native American Heritage Commission, letter to the City of Santa Paula dated 8/21/2017 (see Appendix B)

⁷⁶ SCAG 2016-2040 RTP/SCS PEIR, p. 3.5-46



and AB 52 regarding Native American and tribal cultural resources would reduce the incremental effects of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

Impact CUL-4: Disturb any human remains

Impact Discussion

Project Impacts. The Santa Paula Planning Area is known to have been occupied by Native American groups before European contact, and several archaeological sites have been recorded adjacent to Santa Paula Creek. Since a substantial portion of the General Plan study area has never undergone a systematic archaeological reconnaissance, and some areas are known to contain prehistoric archaeological resources, the potential for encountering additional archaeological remains within the unsurveyed portions of the Sphere of Influence is considered to be extremely high.

As noted in the discussion of Impact CUL-2 above, future development projects or public works activities anticipated in the proposed 2040 General Plan may involve grading, excavation, or other ground-disturbing activities, or could facilitate public access to archaeological sites, which could disturb human remains. Policies and programs in the proposed General Plan listed in **Table 4.6-2** above, together with existing laws such as the Native American Graves Protection and Repatriation Act and *Health and Safety Code* §§ 7050 and 7052, would reduce such impacts to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts to human remains.⁷⁷ However, the proposed policies and programs together with required compliance with existing laws would reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

⁷⁷ SCAG 2016-2040 RTP/SCS PEIR, p. 3.5-46

4. Environmental Setting and Impact Analysis
4.6 Cultural and Tribal Resources



Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant



4.7 Energy

This section evaluates potential impacts of anticipated land use and development consistent with the 2040 General Plan related to the use of energy. The analysis is guided by *CEQA Guidelines* Appendix F (Energy Conservation) and Section VI (Energy) of Appendix G.⁷⁸ The production and consumption of energy are closely related to other environmental issues discussed in **Section 4.4 - Air Quality and Greenhouse Gas Emissions**, **Section 4.17 – Transportation**, and **Section 4.18 - Utilities**.

4.7-1 Setting

Existing Physical Conditions

The 2016-2040 SCAG RTP/SCS Draft Program EIR (Section 3.6.2 beginning at page 3.6-15) contains an extensive discussion of existing energy supplies and consumption in the Southern California region, which is incorporated herein by reference. Information particularly relevant to Santa Paula and Ventura County is summarized below.

Traditional Energy Sources

The major energy sources consumed in the United States are petroleum, natural gas, coal, nuclear, and renewable energy. Primary energy includes petroleum, natural gas, coal, nuclear fuel, and renewable energy. Electricity is a secondary energy source that is generated from these primary forms of energy. The major users are residential and commercial buildings, industry, transportation, and electric power generators. Petroleum accounts for the largest share of U.S. primary energy consumption, followed by natural gas, coal, renewable energy (including hydropower, wind, biomass, geothermal, and solar), and nuclear electric power.

Transporting water in California is a very energy intensive process. The State Water Project (SWP) is the single largest user of energy in the state. The SWP uses approximately 5 billion kWh/year of electricity, which is equal to 2% to 3% of the total electricity consumed in California. Water-related energy use consumes approximately 20% of the total electricity consumed in California.

Petroleum in Transportation. In the United States, 28% of total U.S. energy consumption is used for transportation. Gasoline was the most dominant petroleum fuel, accounting for 56% of total U.S. transportation energy use in 2014. In 2013, in California, transportation is the largest end-use sector for energy use, accounting for 37.8% of energy consumption. Petroleum fuels account for 96% of the State's transportation energy use as the state is a net importer of oil. Within the SCAG region, Southern Californians consumed 9.3 billion gallons of fuel for transportation in 2012. This

78 This section is based in part on information contained in Section 3.6 of the 2016-2040 SCAG RTP/SCS PEIR.



value is expected to decline as California incorporates alternative fuel technologies and policies such as AB 118, which created the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP).

Natural Gas. The SCAG region is served primarily by Southern California Gas Company (SoCalGas), a unit of Sempra Energy. SoCalGas provides natural gas service throughout the SCAG region, except for the southern portion of Orange County, and portions of San Bernardino County. The Southern California Gas Company (SoCalGas) provides natural gas to Santa Paula. According to the California Energy Commission⁷⁹ total natural gas consumption in Ventura County during 2018 was approximately 167 million therms, of which 59% was for residential and 41% was for non-residential purposes.

Electricity. Southern California Edison (SCE) is the largest electricity utility in Southern California with a service area that covers all or nearly all of Orange, San Bernardino, and Ventura Counties, and most of Los Angeles and Riverside Counties. According to the California Energy Commission⁸⁰ total electricity consumption in Ventura County during 2018 was 5,431 gigawatt-hours (GWh), of which 1,811 GWh (33%) was for residential and 3,620 GWh (67%) was for non-residential purposes. SCE reported that approximately 46% of its total electrical production was from carbon-free resources, including solar (13%), wind (10%), hydroelectric (9%), geothermal (8%) and nuclear (6%).⁸¹

Alternative Energy Sources

Alternative fuels, as defined by the Energy Policy Act of 1992, include ethanol, natural gas, propane, hydrogen, biodiesel, electricity, methanol, and p-series fuels. Use of these fuels for transportation can generally reduce air pollutant emissions and can be domestically produced and derived from renewable sources. The Energy Policy Act of 2005 further directed the Department of Energy to carry out a study to plan for the transition from petroleum to hydrogen in a significant percentage of vehicles sold by 2020.

According to the U.S. Department of Energy, Alternative Fuels Data Center, as of 2015 there were nearly 1,600 alternative fueling stations in the SCAG region, 83 of which were in Ventura County.

Regulatory Framework

The 2016-2040 SCAG RTP/SCS Draft Program EIR (Section 3.6.1 beginning at page 3.6-2) describes federal, State, and local statutes and regulations where the primary objective is energy efficiency,

⁷⁹ <http://ecdms.energy.ca.gov/gasbycounty.aspx>

⁸⁰ <http://ecdms.energy.ca.gov/elecbycounty.aspx>

⁸¹ Edison International 2017 Sustainability Report, p. 18
(<https://www.edison.com/content/dam/eix/documents/sustainability/eix-2017-sustainability-report.pdf>)



incorporating renewable energy sources, or energy supply/distribution. That discussion is incorporated herein by reference.

Among the most noteworthy regulations at the local level related to energy consumption are the building codes contained in Title XV, Chapter 150 the Santa Paula Municipal Code, which support the efficient use of energy. The City of Santa Paula has not adopted a climate action plan.

4.7-2 Thresholds of Significance

In accordance with Appendix G to the CEQA Guidelines, the Proposed Project would have a significant impact if it would cause any of the following conditions to occur:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation (Impact EN-1); or
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency (Impact EN-2)

4.7-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to energy consumption expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact EN-1: Wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation

Impact Discussion

Project Impacts. Implementation of the 2040 General Plan could affect the demand for energy resources due to new developments and increases in Santa Paula's population and employment. As also addressed in **Section 4.4 – Air Quality and Greenhouse Gas Emissions**, construction activities require the use of energy, particularly fuels for vehicles and other construction equipment. After completion of new developments, ongoing activities require the use of energy for heating and cooling buildings, operation of appliances and electrical devices, the provision of utilities such as water and public services such as schools and public safety, and for the movement of people and goods.



The 2040 General Plan supports energy conservation by encouraging more compact development patterns and the redevelopment of existing land uses with buildings that are more energy-efficient than existing uses. As a key example, the proposed Downtown District Overlay would incentivize new compact mixed-use development patterns in the Downtown area while rewarding the provision of public benefits such as infrastructure improvements and affordable housing.

Proposed policies and programs in the 2040 General Plan supporting efficient energy use are listed in **Table 4.7-1**.

Table 4.7-1 General Plan Policies and Programs That Support Efficient Energy Use

Policies	Programs
<p>LU 3.5 Compact multi-family development. Encourage multi-family residential development within walking distance of commercial services and public amenities.</p> <p>LU 3.9 Mixed uses. Promote a mix of compatible uses at appropriate intensities in the Downtown, Hallock Center, and along busier streets such as the Harvard Boulevard/Peck Road/Telegraph Road corridors.</p> <p>LU 4.1 Balanced development. Facilitate balanced development consistent with the 2040 RTP/SCS within the existing City limits and the expansion areas subject to the restrictions of the CURB with emphasis on infill development and reuse in accordance with adopted land use regulations and design guidelines. Proposals for annexation should be supported by a fiscal and market analysis demonstrating the feasibility of the proposed development. Where annexation is appropriate, contiguous lands should be developed first and preparation of a Specific Plan will be required. Development in the expansion areas shall be consistent with Error! Reference source not found..</p> <p>LU 5.3 Mixed uses. Promote a mix of commercial and residential uses in the Downtown.</p> <p>CM 1.6 Reduce VMT. Support development and transportation improvements that help reduce per capita VMT and meet the needs of roadway users of all modes and abilities. Utilize per capita VMT as the determinant of operational and environmental impact significance for development projects.</p> <p>CM 2.1 Regional transit coordination. Support VCTC and other transit operators in providing convenient and cost-effective local and regional transit service.</p> <p>CM 2.2 Land use planning. Locate major commercial services, employment centers and public facilities near bus routes whenever feasible.</p> <p>CM 2.3 Rail corridor. Encourage cooperative regional agreements to promote greater utilization of the rail corridor for both transportation and recreation.</p>	<p>LU 5.c Downtown District Overlay. Establish a Downtown District Overlay in the Development Code to provide an incentive-based tool for compatible infill development that supports affordable housing, economic development and public improvements in the Downtown. Density/intensity bonuses up to a maximum of 3.0 FAR may be granted contingent upon the provision of affordable housing or other public benefits and amenities such as public spaces, enhanced streetscaping or public art.</p> <p>LU 5.d Downtown parking. Consider strategies to reduce parking demand and manage supply (shared parking, in-lieu fees, commercial parking, etc.) to improve pedestrian, bicycle and transit mode share, downtown livability, safety, business vitality, vehicle miles traveled (VMT) reduction, and air quality. Implement standards that reduce demand for new parking and private vehicle ownership, and that help maintain optimal parking occupancy and availability.</p> <p>CM 2.a Support enhanced bus service. Actively participate in VCTC programs designed to enhance bus service offerings and bolster ridership.</p> <p>CM 2.b New development. Work with developers and service providers to ensure that new projects are designed to enhance transit connectivity and accessibility.</p> <p>CM 2.c Downtown depot. Preserve options for a future commuter passenger station at the historic Downtown depot with facilities for convenient transfers between different modes of transport.</p> <p>CM 2.d Commuter rail. Work with VCTC and Metrolink to assess potential commuter rail service feasibility, as well as with recreational operators to preserve recreational excursion service.</p> <p>CM 3.b Pedestrian and bicycle facility funding. Pursue additional funding sources for implementation of the Planned Bicycle Network and pedestrian enhancements.</p>



Policies	Programs
<p>CM 3.1 Regional coordination. Support implementation of the Ventura Countywide Bicycle Master Plan, the Ventura County Regional Bikeway Wayfinding Plan, and the City's Planned Bicycle Network.</p> <p>CM 3.2 Encourage pedestrian activity. Ensure that streets, sidewalks and pathways are designed to encourage pedestrian activity by minimizing obstructions, appropriate grades, and locating crosswalks and pedestrian warning signs in areas of concentrated pedestrian activity.</p> <p>CM 3.3 Pedestrian and bicycle facilities. Ensure that new developments are designed to ensure continuity with the existing non-motorized transportation network and include well-designed pedestrian and bicycle facilities, such as:</p> <ul style="list-style-type: none"> - sidewalks with adequate buffers from automobile traffic; - connections to the public sidewalk system; - seating areas; and - bicycle parking and bike share facilities. <p>CM 3.4 Bicycle accessibility. Enhance bicycle accessibility between the Historic Depot, Downtown and other areas of the city, particularly districts to the north and south that are not served by the east-west Santa Paula Branch Trail.</p> <p>CM 3.5 Traffic calming. Explore traffic calming strategies including high-visibility crosswalks and curb extensions/bulb-outs to reduce pedestrian crossing distances along key corridors such as SR 126, Main Street in Downtown, the Harvard Boulevard corridor, and school zones.</p> <p>CM 3.6 Pedestrian priority focus areas. Coordinate pedestrian priority focus areas with existing and future improvement plans for Downtown and the Harvard Boulevard Corridor.</p> <p>CM 4.1 Transportation demand management. Implement TDM strategies that encourage alternatives to single-occupancy vehicles in both existing and new developments.</p> <p>CM 4.2 Parking management. Ensure a balanced parking supply that adequately serves the community while reducing the amount of land devoted to parking and minimizing vehicular trips in predominantly pedestrian-oriented areas.</p> <p>CM 4.3 Safe routes to school. Support Safe Routes to School programs focusing on pedestrian and bicycle safety improvements near local schools.</p> <p>CM 4.4 Encourage alternative transportation. Support public information to encourage alternative modes of transportation.</p> <p>CM 5.1 Goods movement. Promote the efficient movement of goods within Santa Paula and the surrounding region.</p>	<p>CM 3.c Capital Improvement Program. Incorporate priority pedestrian and bicycle facility improvements in the Capital Improvement Program.</p> <p>CM 3.d Regional coordination. Work with VCTC and neighboring jurisdictions to complete the Heritage Valley bike path and other non-motorized routes identified in the County Regional Trails and Pathway Master Plan.</p> <p>CM 4.b Transportation demand management. Continue to encourage TDM techniques such as:</p> <ul style="list-style-type: none"> - Telecommuting from home or satellite work locations - Modified work schedules - Ridesharing incentives (e.g., financial subsidies, preferred parking, ride-matching, guaranteed ride home, car hire services, car/bike share programs, on-site shower and locker facilities for commuters, transit pass programs) - In collaboration with VCTC, support public information campaigns to encourage alternative modes of transportation. <p>CM 5.a Regional coordination. In cooperation with Caltrans and VCTC, establish truck routes in Santa Paula to facilitate the movement of goods while minimizing conflicts with other road users and sensitive land uses.</p> <p>CM 5.b Truck traffic. Discourage trucks from traveling, parking, or idling on local streets and in residential neighborhoods.</p> <p>ECR 2.b Land use and building codes. Update the City's land use and building codes related to air quality and energy efficiency concurrent with each triennial update of the State codes.</p> <p>ECR 2.d City equipment purchasing. When purchasing City vehicles and equipment, prioritize the selection of low-emission and alternative-fuel vehicles and equipment.</p> <p>ECR 2.e Renewable Energy. Continue to encourage the use of solar and other renewable energy sources through incentives such as expedited permit processing.</p>



These policies and programs also support implementation of SCAG's 2016-2040 RTP/SCS. The RTP/SCS Program EIR concluded that:

- Fuel consumption in the SCAG region is expected to decline by 27.4% from 9.3 billion gallons in 2012 to 6.8 billion gallons in 2040.⁸²
- Residential energy consumption is expected to decline from 70 million Btu per household in 2012 to 57 million Btu per household in 2040. RTP/SCS land use strategies supporting more sustainable and energy efficient residential development would result in an estimated 18% reduction in residential energy consumption per household and an estimated 19% reduction in residential electricity consumption per household.⁸³
- Due to increasing efficiencies, water consumption and water-related energy use would be expected to decline by 19% by 2040. Major factors in this reduction are more water-efficient landscaping and higher-density, multi-family and attached single-family development, which typically consume less water for landscaping uses compared to lower-density development. Water use is closely tied to the amount of electricity required to transport, distribute, and treat water. Water-related electricity use is expected to decline from 21,984 gigawatt-hours (GWh) in 2012 to 18,186 GWh in 2040 with the proposed 2016-2040 RTP/SCS, a 17% reduction.⁸⁴

Regulatory requirements discussed above together with 2040 General Plan policies supporting more efficient land use patterns would be expected to result in more efficient use of energy over time. For these reasons, impacts would be less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would result in significant cumulative impacts related to residential energy consumption and building energy consumption.⁸⁵ However, proposed 2040 General Plan policies and programs together with required compliance with existing laws and regulations would substantially reduce wasteful, inefficient or unnecessary consumption of energy, and incremental effects would be less than cumulatively considerable.⁸⁶

82 SCAG 2016-2040 RTP/SCS Draft PEIR, p. 3.6-26

83 Ibid, p. 3.6-27

84 Ibid, p. 3.6-29

85 SCAG 2016-2040 RTP/SCS PEIR, p. 3.6-31

86 Please note that the current (2018) CEQA Guidelines were not in effect at the time the RTP/SCS PEIR was prepared, and different thresholds of significance were used in SCAG's analysis. The significance threshold for this topic in the current CEQA Guidelines focuses on the "wasteful, inefficient or unnecessary consumption of energy" while the RTP/SCS PEIR evaluated total energy consumption.



Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

Impact EN-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

Impact Discussion

Project Impacts. As described under Impact EN-1 above, the policies and programs in the proposed 2040 General Plan support State plans and regulations for renewable energy and energy efficiency. At the local level, the Santa Paula Municipal Code incorporates California Building Code requirements for energy efficiency in new buildings. Land use policies contained in the 2040 General Plan encourage compact development, which also supports State plans for energy efficiency in transportation. For these reasons, impacts would be less than significant.

Cumulative Impacts. As noted under Impact EN-1 above, the RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would result in significant cumulative impacts related to residential energy consumption and building energy consumption but did not directly evaluate consistency with State or local plans for energy efficiency. The proposed 2040 General Plan policies and programs together with required compliance with existing laws and regulations would substantially avoid conflicts with State or local plans for energy efficiency; therefore, incremental effects would be less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

4. Environmental Setting and Impact Analysis
4.7 Energy



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4.8 Geology and Soils

This section evaluates potential impacts related to geologic conditions and geotechnical hazards, including seismic activity, landslides, subsidence, expansive soils and liquefaction.

4.8-1 Setting

Existing Physical Conditions

Detailed information regarding geologic conditions in the Santa Paula area has been presented in several published documents, including the 1998 Santa Paula General Plan Final Environmental Impact Report (EIR), the 2015 Ventura County Multi-Hazard Mitigation Plan (MHMP), and the Ventura County 2040 General Plan Background Report. Key findings regarding geologic hazards affecting Santa Paula are shown in the following maps:

Exhibit 4.8-1 shows that earthquake ground shaking potential in the Santa Paula area is classified as *violent* or *extreme*, as is the case with most other areas of Ventura County.

Exhibit 4.8-2 shows geotechnical hazard areas, including susceptibility for landslides, subsidence, expansive soils, and liquefaction. Potential landslide areas are primarily located on slopes in the northern and southern portions of the planning area, while areas subject to liquefaction or subsidence are found primarily in the floodplain of the Santa Clara River.

The majority of buildings in Santa Paula were constructed in the 1920s, 1950s, and 1960s. Many residential and commercial structures were built prior to the implementation of modern building codes and contain unreinforced masonry. Within Santa Paula's downtown business district, approximately 100 unreinforced masonry buildings have been retrofitted as part of a FEMA grant program.

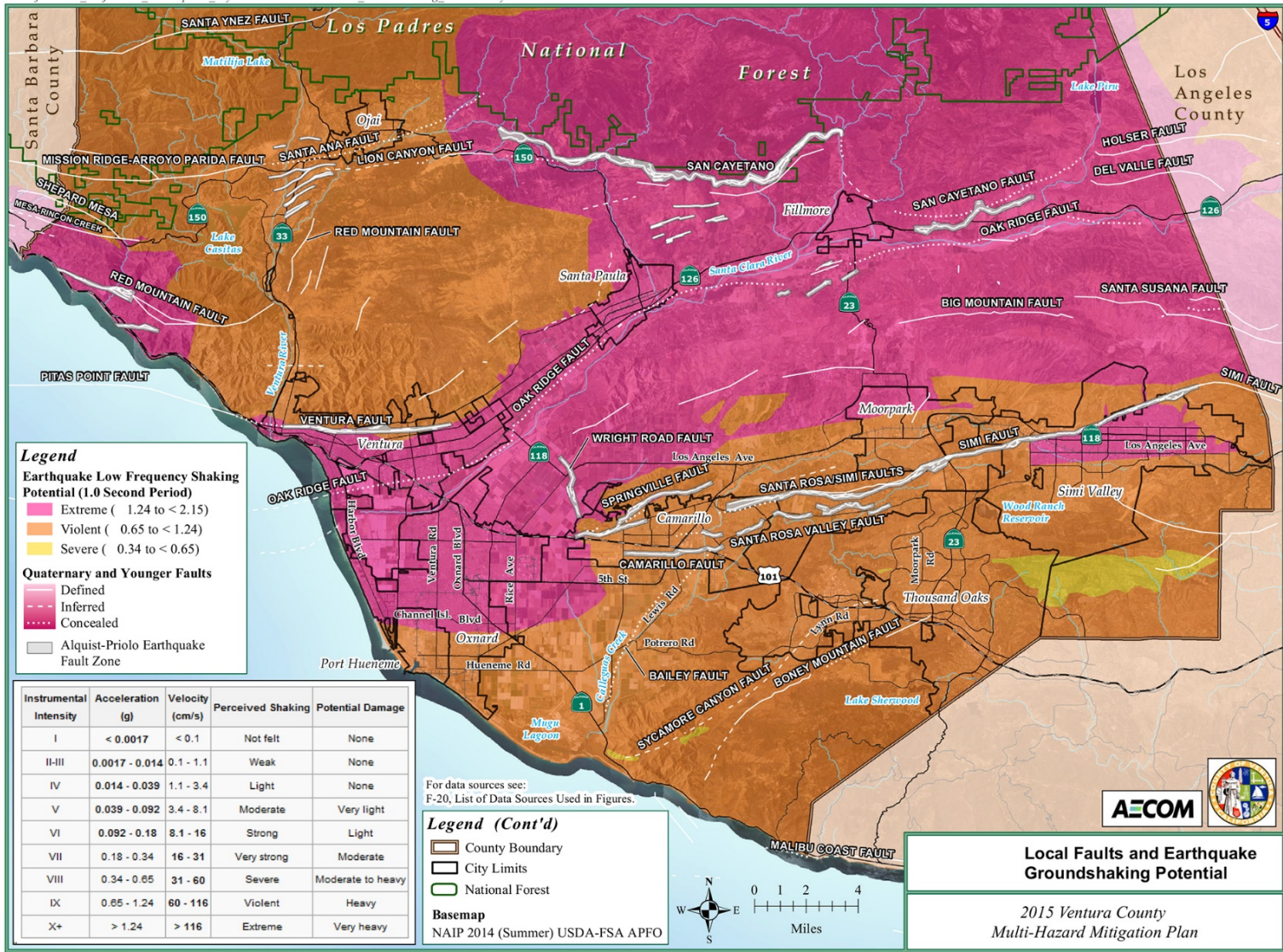


Exhibit 4.8-1 Local Faults and Earthquake Ground Shaking Potential

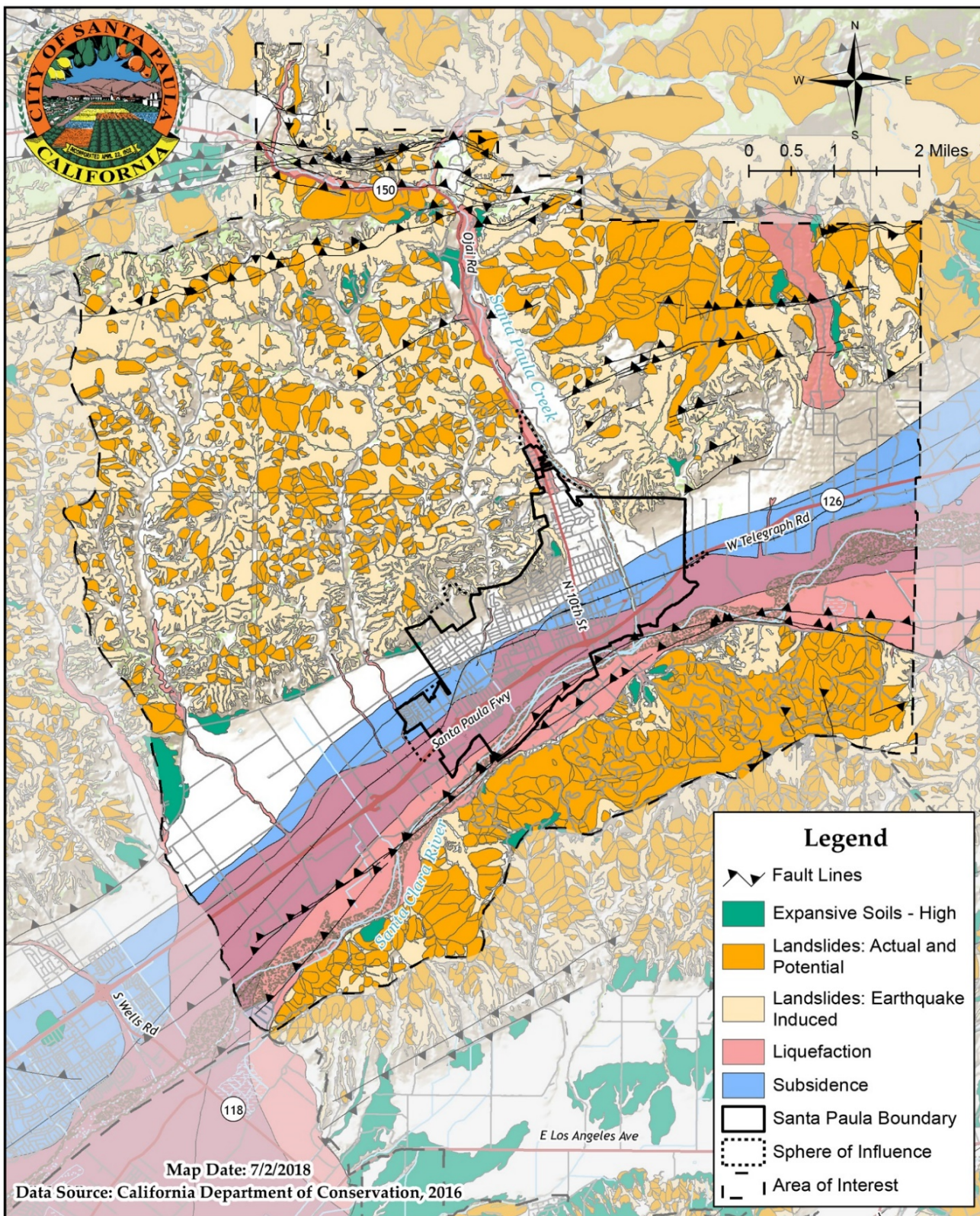


Exhibit 4.8-2 Geotechnical Hazards



Regulatory Framework

Federal

Disaster Mitigation Act (DMA) of 2000. The DMA (Public Law 106-390) amended the Stafford Disaster Relief and Emergency Assistance Act of 1988 (Stafford Act) (Title 42 of the *United States Code* §5121, et seq.) by repealing the act's previous mitigation planning section (409) and replacing it with a new mitigation planning section (322). This new section emphasized the need for state, tribal, and local entities to closely coordinate mitigation planning and implementation efforts, and also provided the legal basis for Federal Emergency Management Agency (FEMA) mitigation plan requirements for mitigation grant assistance. Local mitigation planning requirements are identified in their appropriate sections throughout the 2015 MHMP.

State

Alquist-Priolo Earthquake Fault Zoning Act. The Alquist-Priolo Special Studies Zones Act was signed into law in 1972 (renamed the Alquist-Priolo Earthquake Fault Zoning Act in 1994). The Act's primary purpose is to mitigate fault rupture hazards on human life and property by limiting the potential for siting occupied structures across an active fault trace.

The Act requires the State Geologist (Chief of the California Geological Survey) to delineate Earthquake Fault Zones along faults that are "sufficiently active and well defined." These faults show evidence of Holocene⁸⁷ surface displacement along one or more of their segments (sufficiently active) and are clearly detectable by a trained geologist as a physical feature at or just below the ground surface (well defined).

The boundary of an Earthquake Fault Zone is generally about 500 feet from major active faults, and 200 to 300 feet from well-defined minor faults. The Act dictates that cities and counties withhold development permits for sites within an Earthquake Fault Zone until geologic investigations demonstrate that the sites are not threatened by surface displacements from future faulting.

Alquist-Priolo maps are distributed to all affected cities and counties for use in planning and development review. Local agencies must regulate most development projects within these zones, including all land divisions and most structures for human occupancy. State law exempts single-family wood-frame and steel-frame dwellings with fewer than three stories that are not part of a development of four units or more. However, local agencies can be more restrictive.

⁸⁷ The Holocene is the most recent geological epoch, which began approximately 11,700 years ago



Seismic Hazards Mapping Act. The Seismic Hazards Mapping Act (SHMA) addresses non-surface fault rupture earthquake hazards, including strong ground shaking, liquefaction, and seismically induced landslides. The California Geological Survey (CGS) is the principal state agency charged with implementing this law. Pursuant to the SHMA, the CGS is directed to provide local governments with seismic hazard zone maps that identify areas susceptible to liquefaction, earthquake-induced landslides, and other ground failures. The goal is to minimize loss of life and property by identifying and mitigating seismic hazards. The seismic hazard zones delineated by the CGS are referred to as “zones of required investigation.” Site-specific geological hazard investigations are required by the SHMA when construction projects fall within these areas.

Pursuant to the SHMA, the CGS has been releasing seismic hazards maps since 1997, with emphasis on the large metropolitan areas of Los Angeles, Orange, and Ventura counties. To date, the CGS has collected data for “zones of required investigation” for most of Ventura County.

California Building Code. The California Building Standards Law requires every local agency enforcing building regulations to adopt the provisions of the California Building Code (CBC) within 180 days of its publication; however, each jurisdiction can require more stringent regulations issued as amendments to the CBC. The publication date of the CBC is established by the California Building Standards Commission, and the code is known as Title 24 of the *California Code of Regulations*. In the past, the CBC was modeled on the Uniform Building Code (UBC); however, beginning in 2007 the CBC is now modeled after the International Building Code (IBC). Building codes provide minimum requirements to prevent major structural failure and loss of life related to floods, fires, and earthquakes. The City of Santa Paula adopted the 2016 CBC through Ordinance 1265 on January 3, 2017.

Real Estate Disclosure Act. Since 1998, the Natural Hazards Disclosure Act has required sellers of real property and their agents to provide prospective buyers with a Natural Hazard Disclosure Statement when the property being sold lies within one or more state-mapped hazard areas. If a property is located in a Seismic Hazard Zone as shown on a map issued by the State Geologist, the seller or the seller’s agent must disclose this fact to potential buyers.

Unreinforced Masonry Law. The Unreinforced Masonry Law (§8875, et seq. of the *California Government Code*) requires all cities and counties in Seismic Zone 4 (zones near historically active faults) to identify potentially hazardous unreinforced masonry (URM) buildings in their jurisdictions, establish a URM loss reduction program, and report their progress to the state. The owners of such buildings must be notified of the potential earthquake hazard these buildings pose.



General Plan Law. Section 65302(g) of the *California Government Code* specifies that the General Plan shall include “a safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence; liquefaction; and other seismic hazards ... The safety element shall include mapping of known seismic and other geologic hazards.”

Local

Santa Paula Municipal Code. The Municipal Code includes land use and building regulations that mitigate potential impacts related to seismic and other geologic hazards. These include subdivision regulations (Title XVI, Chapter 16.80), grading regulations (Title XVI, Chapters 16.96, 16.97 and 16.98), and building codes (Title XV, Chapter 150).

4.8-2 Thresholds of Significance

In accordance with Appendix G to the CEQA Guidelines, the Proposed Project would have a significant impact if it would cause any of the following conditions to occur:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (Impact GEO-1)
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - ii) Strong seismic ground shaking.
 - iii) Seismic-related ground failure, including liquefaction.
 - iv) Landslides.
- b) Result in substantial soil erosion or the loss of topsoil (Impact GEO-1)
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse (Impact GEO-1)
- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. (Impact GEO-1)
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. (*As noted in the Notice of Preparation [Appendix A] all new development in Santa Paula must be connected to a sanitary sewer system; therefore, this potential impact is not addressed further in this EIR.*)
- f) Directly or indirectly destroy a significant paleontological resource, site, or unique geologic feature. (Impact GEO-2)



4.8-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to geology, soils and paleontological resources expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact GEO-1: Effects due to rupture of a known earthquake fault, Strong seismic ground shaking, Seismic-related ground failure including liquefaction, landslides, soil erosion, or unstable or expansive soil

Impact Discussion

Project Impacts. Like most parts of California, the Santa Paula Planning Area is subject to a variety of geological hazards. As seen in **Exhibit 4.8-1**, earthquake shaking potential is rated as *violent* or *extreme* in most of the area, while **Exhibit 4.8-2** shows areas that are subject to potential geotechnical hazards resulting from expansive soils, landslides, liquefaction and subsidence.

Construction activities consistent with the General Plan would include site clearing, excavation, grading, leveling, and implementation of hillside management and drainage improvements, all of which could expose soils making them vulnerable to erosion by wind or water.

These potential impacts to development associated with the proposed General Plan would be addressed through required compliance with building codes and site-specific geotechnical studies, which identify specific mitigation requirements based on the geologic characteristics of the site. The policies and programs contained in the proposed General Plan addressing geologic hazards are listed in **Table 4.8-1**. In addition, policies and programs related to water quality (see **Table 4.10-1** in **Section 4.10 – Hydrology and Water Quality**) also address the issue of soil erosion and loss of topsoil. These policies and programs, together with the building regulations contained in the Municipal Code, would reduce potential impacts to a level that is less than significant.



Table 4.8-1 General Plan Policies and Programs That Reduce Geologic Hazards

Policies	Programs
<p>HPS 1.1. Land use planning. The City's land use plans and regulations shall be designed to minimize risks from geologic hazards by locating development in areas where such risks can be mitigated to an acceptable level.</p> <p>HPS 1.2. Compliance with regulations. Development proposals shall be designed to minimize potential risk from geologic hazards through compliance with all applicable regulations, and measures shall be required to mitigate risks to an acceptable level. In areas where geologic risks cannot be feasibly mitigated to an acceptable level, development shall not be approved.</p> <p>HPS 1.3. Unreinforced masonry. Facilitate the seismic upgrade of unreinforced masonry buildings as required by state regulations. Remove or rehabilitate structures that may be expected to collapse in the event of an earthquake including, but not limited to, unreinforced masonry buildings pursuant to Government Code Section 8875 et seq., bridges, and critical facilities.</p> <p>HPS 1.4. Water wells. Develop standards and restrictions, such as limits on density and restrictions on water wells in areas subject to subsidence.</p>	<p>HPS 1.a. Building codes. Review building regulations and records annually and ensure that current state codes and sources of geologic hazard information are used in reviewing development proposals. Special consideration shall be given to appropriate regulations regarding Critical, Sensitive and High-Occupancy Facilities.</p> <p>HPS 1.b. Geotechnical investigations. Establish standards and requirements for geotechnical investigations and mitigation measures to be followed by development applicants.</p> <p>HPS 1.c. Development review. As part of the development review process, assist applicants in demonstrating conformance with all applicable geotechnical regulations and identify appropriate mitigation measures.</p> <p>HPS 1.d. Seismic retrofitting. Adopt regulations regarding seismic retrofitting of existing structures that do not meet current standards. The regulations shall include:</p> <ul style="list-style-type: none"> a. Requirements for upgrading unreinforced masonry buildings. b. Concepts and provisions of the state code for historic buildings, to provide additional flexibility for preservation of historic buildings while protecting them from significant earthquake damage. c. An enforcement schedule with all upgrading completed during that time. d. Signs shall be posted and maintained on unreinforced masonry buildings to warn occupants of potential hazards. <p>HPS 1.e. Unreinforced masonry housing. Develop strategies and program options for preservation or replacement of the low- and moderate-income housing in unreinforced masonry buildings. Possible strategies include, among others: low-interest loans for seismic rehabilitation of residential buildings; preservation of nonconforming zoning rights for in-kind replacement of residential buildings; and relocation assistance for any displaced occupants.</p> <p>HPS 1.f. Unreinforced masonry commercial buildings. Consider appropriate means of economic relief for unreinforced masonry commercial buildings, such as: preservation of non-conforming zoning rights for in-kind replacement of commercial buildings, and seeking grant funding for the coordinated upgrading of seismic, economic, and general design characteristics of affected commercial areas.</p> <p>HPS 1.g. Abandoned water wells. Mitigate high groundwater problems related to improperly-abandoned water wells wherever possible by proper sealing and abandonment procedures.</p> <p>HPS 1.h. Slope density. Enforce regulations including Municipal Code Chapter 16.98 limiting the density and intensity of development on slopes.</p> <p>HPS 1.i. Subsidence. If soil subsidence is observed in the portion of the Santa Clara River Valley within the Santa Paula planning area, the Santa Paula Department of Public Works should initiate an investigation to evaluate the cause for the subsidence and develop a program to halt or retard the subsidence.</p> <p>HPS 1.j. Disaster recovery. Review the City's Emergency Response Plan to ensure that it includes adequate provisions for assessment of structural damage to bridges, over and underpasses, and walls in the public right-of-way to ensure safety after a seismic event.</p>



Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to seismic and other geological hazards.⁸⁸ However, the proposed policies and programs together with required compliance with existing laws and regulations would substantially reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

Impact GEO-2: Directly or indirectly destroy a significant paleontological resource or site or unique geologic feature

Impact Discussion

Project Impacts. Future development projects or public works activities as anticipated in the 2040 General Plan may involve grading, excavation, or other ground-disturbing activities, or could facilitate public access to or disturb paleontological resources or unique geologic features. Policies and programs in the proposed General Plan and listed in **Table 4.6-2** above, such as requiring a cultural resources assessment for discretionary developments that would involve grading or excavation in previously undisturbed areas, would substantially reduce such impacts to a level that is less than significant.

Table 4.8-2 General Plan Policies and Programs That Reduce Impacts to Paleontological Resources or Unique Geological Features

Policies	Programs
ECR 4.1. Encourage cultural and historic preservation. Future land use decisions affecting the community's heritage must recognize the irreplaceable nature of cultural resources. The value of these resources is to be given equal weight with other factors in the decision-making process. Historic preservation is a valuable tool to retain the city's heritage, and activities and development that could damage cultural, archaeological,	ECR 4.a. Development review. As part of the development review process, evaluate potential impacts to cultural and historic resources, including tribal cultural resources, and require appropriate mitigation as necessary to avoid significant impacts in conformance with State and Federal law. For proposed discretionary developments that would involve grading or excavation in previously undisturbed areas, require the applicant to provide a cultural resources assessment by a qualified

⁸⁸ SCAG 2016-2040 RTP/SCS PEIR, p. 3.7-33 & 34



Policies	Programs
paleontological, historical or architectural resources should be avoided. ECR 6.1 Open space planning and development. The Santa Clara River, Santa Paula Creek and the ridgelines, mountains and canyons surrounding the city should be treated as important assets to be conserved, and new development must be designed in a manner sensitive to the natural features of the site and the surrounding character. All new residential, commercial, and industrial developments shall provide open space amenities, and development south of the Santa Clara River should be limited to low-intensity uses requiring few public services or infrastructure.	archaeologist identifying potential archaeological and paleontological impacts and establishing appropriate mitigation measures. ECR 6.a Land use planning. Use Open Space land use designations to preserve scenic, environmentally constrained and recreational properties, and establish appropriate standards for the type and intensity of development in or adjacent to the river, creeks and barrancas. Continue to provide an Institutional/Civic or Open Space designation, as appropriate, for all public buildings and lands.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts to paleontological resources.⁸⁹ However, the proposed policies and programs would reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

⁸⁹ SCAG 2016-2040 RTP/SCS PEIR, p. 3.5-46



4.9 Hazards and Hazardous Materials

This chapter addresses the issues of hazardous materials, aviation hazards, and emergency response. The related issue of wildland fire hazards is addressed in **Section 4.19 - Wildfire**.

4.9-1 Setting

Existing Physical Conditions

Hazardous Materials

Information on hazardous materials and contaminated properties is maintained by both the State of California and the County of Ventura. This section identifies the agencies and programs responsible for managing this information, as well as the presence of hazardous materials and sites in Santa Paula.

The California Environmental Protection Agency (CalEPA) maintains the State of California Hazardous Waste and Substances List (also known as the “Cortese List”). *California Government Code* §65962.5 requires CalEPA to annually update the Cortese List. The Department of Toxic Substances Control (DTSC) is responsible for providing a portion of the Cortese List information, while other state and local agencies provide the remaining information

The EnviroStor database, managed by DTSC, lists Brownfield sites (a US EPA program for contaminated properties), sites undergoing hazardous materials mitigation, sites with known contamination that may require further investigation, federal Superfund sites, state response sites, voluntary cleanup sites, and school cleanup sites.

The California Water Resources Control Board and the State’s Regional Water Quality Control Boards maintain “GeoTracker,” a data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

GeoTracker contains records for sites that require cleanup, such as Leaking Underground Storage Tank (LUST) sites, Department of Defense sites, and Cleanup Program sites. GeoTracker also contains records for permitted facilities such as Irrigated Lands, Oil and Gas production, operating Permitted USTs, and Land Disposal sites. GeoTracker portals retrieve and compile records from multiple State Water Board programs and other agencies.

Since January 1, 2013 all businesses that submit facility information such as hazardous materials business plans, underground storage tank, and hazardous waste generator forms and related documents have been required to use the internet to submit this information to their local agency electronically through the California Environmental Reporting System (CERS). CERS benefits regulated facilities by simplifying the document submittal process, including new information



submittals and updating existing information to the CUPA. CERS allows response agencies quick access to current data during emergency response activities.

Updated information on state-maintained data is available through DTSC's EnviroStor at: <http://www.envirostor.dtsc.ca.gov/public/> and the Water Boards' GeoTracker at: <http://geotracker.waterboards.ca.gov/>. A full list of Ventura County CUPA facilities and programs, including USTs, can be found at: http://www.vcrma.org/envhealth/EHD_FACILITY_LISTS/cupa_facilities.pdf.

As of April 2017, no facilities in Santa Paula were reported on the EnviroStor database (Cortese List); however, approximately 220 regulated facilities in Santa Paula were on the County's CUPA list.

Aviation

This section describes relevant conditions for Santa Paula Airport, a general aviation facility privately owned and operated by the Santa Paula Airport Association. The airport is located within the south-central portion of the city, and is bounded by SR 126 on the north, Palm Avenue on the west, Ojai Street on the east, and the Santa Clara River on the south. The airport encompasses a total of about 38 acres and provides a single asphalt runway approximately 2,650 feet long by 40 feet wide.

Airport Operational Characteristics. The airport handles approximately 52,000 operations (takeoffs or landings) per year, which are primarily recreational aviation users. There are no commercial airline operations at the airport. The runway is used by piston and propeller, single- and twin-engine planes under visual flight rule conditions only, indicating that approaches to the runway are only made in weather conditions where the cloud cover is greater than 1,000 feet in height and visibility is greater than 3 miles. The airport is currently not licensed to operate at night.

Air Safety Zones. The State of California has defined air safety zones in the Airport Land Use Planning Handbook.⁹⁰ Air safety zones⁹¹ applicable to Santa Paula Airport include the *Runway Protection Zone* (formerly called the Inner Safety Zone); the *Outer Safety Zone*; and the *Traffic Pattern Zone*.

The *Runway Protection Zone* (shown as the *KS-IS Overlay* on the Zoning Map) is the area below the portion of the approach surface from the end of the primary surface to the point where the approach surface is 50 feet above the runway end elevation. The *Outer Safety Zone* (shown as the

⁹⁰ <http://dot.ca.gov/hq/planning/aeronaut/documents/alucp/AirportLandUsePlanningHandbook.pdf>

⁹¹ A fourth air safety zone, the Extended Runway Centerline Zone, was not applied by the Ventura County CLUP for Santa Paula Airport due to the lack of a relationship with historical aircraft accident data in Ventura County, and the lack of instrument approaches at the airport.



KS-OS Overlay on the Zoning Map) underlies a portion of the approach surface which extends beyond the *Runway Protection Zone*. These two zones extend a total of 3,500 feet from the end of the runway based on the type of aircraft currently using, or projected to use, the airport.

The *Traffic Pattern Zone* is the area beneath the outer edge of the aircraft flight paths and is shown on the Zoning Map as the *KI-Airport Influenced Area Overlay*. Air Safety and Height Restriction Zones for the Santa Paula Airport are shown on **Exhibit 4.9-1**. **Table 4.9-1** presents land use compatibility standards for safety zones as established by the Ventura County CLUP.

General Plan Land Use Designations. The airport property is designated *Airport* on the proposed 2040 General Plan Land Use Map and most properties within the various safety zones shown in **Exhibit 4.9-1** are designated for compatible uses such as *Industrial*, *Light Industrial*, and *Industrial Park* (**Exhibit 3.4-1** on page [3-6](#)). However, the eastern portion of Rancho Santa Paula Mobile Home Park, located west of Steckel Drive and south of SR-126, is within the Outer Safety Zone as designated by CLUP Exhibit 6C. According to the CLUP, all residential uses are classified as *Unacceptable* within an Outer Safety Zone.

Existing non-conforming residential uses located between the airport and S. Mountain Road south of Santa Maria Street are also located within either the Inner Safety Zone or Outer Safety Zone and are considered *Unacceptable* according to the CLUP. However, these properties are designated *Light Industrial* on the proposed Land Use Map, which is considered *Conditionally Acceptable* in the CLUP.

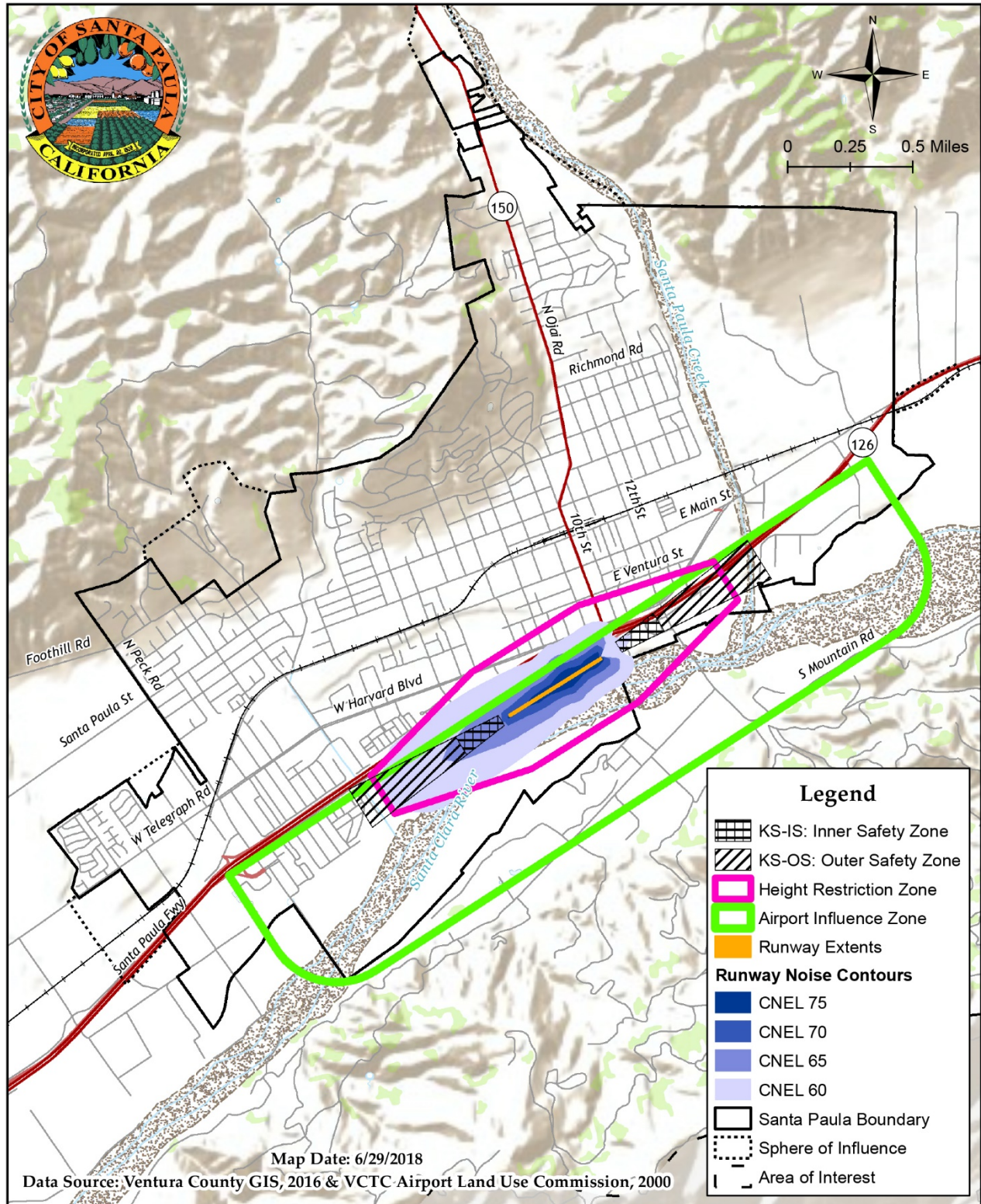


Exhibit 4.9-1 Airport Safety Zones and Noise Contours



Table 4.9-1 Land Use Compatibility Standards in Safety Zones for Civilian Airports

Land Use	Runway Protection Zone	Outer Safety Zone	Traffic Pattern Zone	Extended Traffic Pattern Zone
Residential				
Single-Family	U	U	C ^{a,e}	A ^e
Multi-Family	U	U	C ^{a,e}	A ^e
Mobile Home Parks	U	U	C ^{a,e}	A ^e
Public/Institutional				
Hospitals/Convalescent Homes	U	U	U	A ^e
Schools	U	U	U	A ^e
Churches/Synagogues	U	U	U	A ^e
Auditoriums/Theaters	U	U	U	A ^e
Commercial				
Hotels and Motels	U	U	C ^{c,e}	A ^e
Office and Business/Professional Services	U	C ^{a,e}	C ^{c,e}	A
Wholesale	U	C ^{a,e}	C ^{c,e}	A
Retail	U	C ^{a,e}	C ^{c,e}	A
Industrial/Transportation, Communication, and Utilities				
Manufacturing – General/Heavy	U	C ^{a,e}	C ^{c,e}	A
Light Industrial	U	C ^{a,e}	C ^{c,e}	A
Research and Development	U	C ^{a,e}	C ^{c,e}	A
Business Parks/Corporate Offices	U	C ^{a,e}	C ^{c,e}	A
Transportation Terminals	U	U	A	A
Communication/Utilities	C ^b	A	A	A
Automobile Parking	C ^b	A	A	A
Recreation/Open Space				
Outdoor Sports Arenas	U	U	U	A
Outdoor Amphitheaters	U	U	U	A
Parks	U	C ^a	A	A
Outdoor Amusement	U	C ^{a,e}	A	A
Resorts and Camps	U	C ^{a,e}	A ^e	A ^e
Golf Courses and Water Recreation	C ^d	A	A	A
Agriculture	A	A	A	A

Source: Table 6B, p. 6-6; Airport Comprehensive Land Use Plan for Ventura County, July 2000,

A Acceptable land use

C Land use is conditionally acceptable upon meeting required criteria (see footnotes below)

U Unacceptable land use

Notes

a Maximum structural coverage must be no more than 25%. "Structural coverage" is defined as the percent of building footprint area to total land area, including streets and greenbelts.

b The placing of structures or buildings in the Runway Protection Zone is unacceptable. Above ground utility lines and parking are allowed only if approved by the Federal Aviation Administration (FAA) as not constituting a hazard to air navigation.

c Maximum structural coverage must not exceed 50%. "Structural coverage" is defined as the percent of building footprint area to total land area, including streets and greenbelts. Where development is proposed immediately adjacent to the airport property, structures should be located as far as practical from the runway.

d Clubhouse is unacceptable in this zone.

e An aviation easement is recommended and a fair disclosure agreement and covenant shall be recorded by the owner and developer of the property.



Emergency Response

California Office of Emergency Services. The California Office of Emergency Services (California OES) was established as part of the Governor's Office in 1950 as the State Office of Civil Defense. The agency became more involved in natural disaster operations, and the name was changed to the California Disaster Office in 1956. Adoption of the Emergency Services Act in 1970 changed the agency's name to the Office of Emergency Services.

The California OES serves as the lead State agency for emergency management in California. To ensure the most effective use of all resources for dealing with any emergency, California OES includes government agencies at all levels, businesses, community based organizations, and volunteers in their process.

The California OES mission is to ensure the State is ready and able to mitigate against, prepare for, respond to, and recover from the effects of emergencies that threaten lives, property, and the environment. OES coordinates the activities of all State agencies relating to preparation and implementation of the State Emergency Plan. California OES also coordinates the response efforts of State and local agencies to ensure maximum effect with minimal overlap and confusion. Additionally, California OES coordinates the integration of Federal resources into State and local response and recovery operations.

Ventura County Sheriff's Office of Emergency Services. The Ventura County Sheriff's Office of Emergency Services (County OES) is responsible for countywide all hazards disaster preparedness, planning, response and recovery. OES staff work with all County departments, ten cities, public and private organizations, community and civic groups to lead a whole community emergency management program. OES responsibilities include, emergency management preparedness, planning, emergency alert and warning, the implementation of emergency evacuation and shelter plans, the maintenance and operation of the County Emergency Operations Center and leading recovery operations. To prepare for potential emergencies, the OES maintains an Emergency Operations Plan that ensures that the County's Emergency Operations Center is in a constant state of readiness. OES also leads the development of maintains the Operational Area Multi Hazard Mitigation Plan and administers the largest homeland security and emergency management grant program in the county. The coverage of the OES encompasses all of Ventura County and involves the support of agencies of all levels of government, public and private organizations, and community and civic groups. On an annual basis, OES leads, coordinates and supports countywide preparedness, response and recovery efforts to approximately a dozen large scale incidents or disasters per year.

Ventura County Emergency Medical Services (EMS) Agency. The Ventura County Public Health Department includes the Ventura County Emergency Medical Services (EMS) Agency.



This Agency provides oversight and guidance of the delivery of emergency medical services throughout Ventura County. The Agency handles approximately 45,000 emergency medical calls each year and is responsible for over 30,000 patient transports to local hospitals. In 2015, approximately 29,000 of these calls were in collaboration with VCFD.

Ventura County Fire Department (VCFD). VCFD is the largest first responder in the county, with 122 firefighters in the field daily with either Emergency Medical Technician (EMT) or Paramedic certification. VCFD does not provide transport services, and instead works with ambulance services in the county, as needed, including Ventura County EMS. The Fire Communications Center (FCC) dispatches for all ambulance services in Ventura County. In 2018 Santa Paula was annexed into the VCFD.

Regulatory Framework

Hazardous Materials

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A *hazardous material* is defined in *California Health and Safety Code* §25501 as: any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that meets the definition according to the handler or the administering agency. Chemical and physical properties of a substance are directly related to the degree of hazard it poses, including properties of toxicity, ignitability, corrosiveness, and reactivity.

These materials can pose a substantial present or future hazard to human health or the environment if improperly handled, stored, disposed, remediated, or otherwise managed.

Hazardous material releases can result in short-term and long-term effects on the local population and the environment. Hazardous materials are governed by regulations that require proper transport, storage, handling and disposal, business and environmental management plans, spill contingency plans, employee and public noticing, and other emergency preventive and response measures to minimize the risk of accidental releases and related environmental impacts. Chemicals and other materials found in soils of agricultural land or industrial sites as a result of current or past activity may also be of concern. When development on such sites is considered, potentially hazardous materials are identified and evaluated through a Phase I and/or Phase II environmental site assessment review conducted by the developer.



Federal

Federal agencies that regulate hazardous materials include the U.S. Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), the United States Department of Transportation (DOT), and the National Institutes of Health (NIH). The following federal laws and guidelines govern hazardous materials storage, handling, and remediation in Ventura County:

- Occupational Safety and Health Act
- Federal Insecticide, Fungicide, and Rodenticide Act
- Comprehensive Environmental Response, Compensation, and Liability Act
- Guidelines for Carcinogens and Biohazards
- Superfund Amendments and Reauthorization Act Title III
- Resource Conservation and Recovery Act
- Toxic Substances Control Act

U.S. Environmental Protection Agency (EPA). EPA is responsible for researching and setting national standards for a variety of environmental programs, and delegates to states and local government responsibility for issuing permits, and monitoring and enforcing compliance. EPA Region IX has authority over Ventura County, regulating chemical and hazardous materials use, storage, treatment, handling, transport, and disposal practices; protects workers and the community (along with Cal/OSHA, see page [4.9-10](#) below); and integrates the federal Clean Water Act and the Clean Air Act into California legislation.

Federal Occupational Safety and Health Administration (OSHA). OSHA establishes and enforces federal regulations related to health and safety of workers exposed to toxic and hazardous materials. In addition, OSHA sets health and safety guidelines for construction activities and manufacturing facility operations.

State

California passed the Hazardous Waste Control Act (HWCA) in 1972, which created the California Hazardous Waste Control Program. The program surveyed existing hazardous waste generation to determine the need for new or expanded facilities for meeting future waste management demands. The facility permitting program, designed to protect public health and the environment through the issuance of operating permits for facilities that treat, store, or dispose of hazardous wastes, provided a mechanism for in-depth inspections and a permit review of each hazardous waste facility at least every 10 years.

California Environmental Protection Agency (CalEPA). In 1991, CalEPA was established to oversee and coordinate the activities of the Air Resources Board, the Integrated Waste Management Board (succeeded by the Department of Resource Recycling and Recovery), the



Department of Pesticide Regulation, the Department of Toxic Substances Control, the Office of Environmental Health Hazard Assessment, and the State Water Resources Control Board.

Certified Unified Program Agency Program. In 1992, Senate Bill 1082 created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), to ensure consistency throughout the state regarding hazardous waste and materials standards. CalEPA oversees the entire Unified Program and certifies local government agencies, known as Certified Unified Program Agencies (CUPAs), to implement the program.

A local agency, such as a county or a city, applies to CalEPA for certification as the CUPA responsible for implementing the Unified Program within its jurisdiction. A CUPA must establish a program that consolidates, coordinates, and makes consistent the administrative requirements, permits, inspection activities, enforcement activities, and hazardous waste and hazardous materials fees. The implementation of the Unified Program must not result in more fragmentation between jurisdictions than existed before the Unified Program, and the Unified Program must be consistent throughout the entire county.

The Unified Program is implemented at the local level, but the program is certified by the Secretary of CalEPA. The Governor's Office of Emergency Services, the Department of Toxic Substances Control, the Office of the State Fire Marshal, and the State Water Resources Control Board are also involved with the Unified Program.

Governor's Office of Emergency Services (OES). The OES supports and enhances emergency management, including preparedness, response, recovery, and mitigation needs, and assists local and tribal governments with hazard mitigation planning. The OES also develops the State Hazard Mitigation Plan, and responds to and aids in recovery from emergencies within the state. In addition, the OES is responsible for providing technical assistance and evaluation of the Hazardous Material Release Response Plan (Business Plan) and the Area Plan programs.

California Department of Toxic Substances Control (DTSC). DTSC regulates hazardous substances and wastes, oversees remedial investigations, protects drinking water from toxic contamination, and warns the public regarding listed carcinogens. DTSC also provides technical assistance and evaluation for the hazardous waste generator program including on-site treatment (tiered permitting).

CAL FIRE – Office of the State Fire Marshal (OSFM). The OSFM is responsible for ensuring the implementation of Hazardous Material Management Plan (HMMP), the Hazardous Materials Inventory Statement (HMIS), and the Aboveground Petroleum Storage Act (APSA) programs. The HMMP and HMIS programs are closely tied to the Business Plan Program. In



addition, OSFM also handles the oversight and enforcement for the aboveground storage tank program. The OSFM is also responsible for ensuring the implementation of the California Fire Code HMMP/HMIS and the APSA program elements.

California Highway Patrol/California Department of Transportation. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) have primary regulatory responsibility for the transportation of hazardous wastes and materials.

California Occupational Safety and Health Administration (Cal/OSHA). Cal/OSHA is responsible for promulgating and enforcing state health and safety standards, and implementing federal OSHA laws. Cal/OSHA has authority to set and enforce standards to minimize the potential for release of asbestos and lead during construction and demolition activities.

State Water Resources Control Board/ Regional Water Quality Control Boards. The State Water Resources Control Board provides technical assistance and evaluation for the underground storage tank program. The Los Angeles Regional Water Quality Control Board (LARWQCB) is one of nine regional boards charged with protecting surface and groundwater from pollutants discharged or threatened to be discharged to the Waters of the State. Ventura County is within the jurisdictional territory of the LARWQCB. The RWQCB issues and enforces National Pollutant Discharge Elimination System (NPDES) permits and regulates leaking underground storage tanks and other sources of groundwater contamination.

California Accidental Release Prevention Program (CalARP). The objective of the CalARP program is to identify the risks associated with the use of extremely hazardous materials and to reduce the chances and negative effects to the public of an extremely hazardous materials release. To accomplish this, a facility must develop and maintain risk management plans and programs described in the *California Code of Regulations*, Title 19, Chapter 4.5. Facilities subject to CalARP are inspected and evaluated to determine the completeness and effectiveness of risk management plans and programs. The CUPA regulates facilities subject to CalARP within Ventura County, with the exception of the cities of Oxnard and Ventura.

Local

Local agencies that coordinate and implement hazardous materials regulations and protocols in Ventura County include the Ventura County Air Pollution Control District (VCAPCD), the Ventura County CUPA, the Ventura County Fire Protection District, and the Santa Paula Fire Department.

Ventura County Air Pollution Control District. The VCAPCD regulates the demolition of buildings and structures that may contain asbestos through both inspection and law



enforcement. The VCAPCD is to be notified 10 days in advance of any proposed demolition or abatement work. The provisions that cover these operations are found in VCAPCD Regulation 1, Rules 62 and 62-1: Hazardous Materials and Airborne Toxics; Hazardous Materials. Individual project contractors are required to implement standard state and federal procedures for asbestos containment and worker safety. The rule requires special handling of asbestos-containing building materials (ACBMs) and prohibits any visible emissions of ACBMs to outside air. Individual project applicants are required to consult with the VCAPCD Enforcement Division prior to commencing demolition of a building containing ACBMs.

Ventura County Environmental Health Division, Certified Unified Program Agency (VC CUPA). VC CUPA is the CUPA for all incorporated and unincorporated areas of Ventura County, with the exception of the City of Oxnard. This means VC CUPA has been certified by the CalEPA to implement the following state environmental programs:

- Hazardous Waste
- Hazardous Materials Business Plan (HMBP)
- California Accidental Release Prevention Program (CalARP)
- Underground Hazardous Materials Storage Tanks (UST)
- Aboveground Petroleum Storage Act (APSA) / Spill Prevention, Control, and Countermeasure Plan
- Onsite Hazardous Waste Treatment/ Tiered Permit

The HMBP is required to include a summary of business activities, owner and operator information including emergency contacts, the type and quantity of reportable hazardous materials, a site map, emergency response procedures, and an employee training program. In general, the submittal of an HMBP is required if a business handles and/or stores a hazardous material equal to or greater than the minimum reportable quantities. These quantities are 55 gallons for liquids, 500 pounds for solids, and 200 cubic feet (at standard temperature and pressure) for compressed gases. Exemptions to filing a HMBP are listed in the *California Health and Safety Code*. The CUPA is responsible for HMBP program compliance for the unincorporated area in Ventura County and within the cities of Simi Valley, Thousand Oaks, Moorpark, Fillmore, Santa Paula, Camarillo, Port Hueneme, and Ojai.

Ventura County Environmental Health Division regulates the construction, operation, repair, and removals of underground storage tank (UST) systems within Ventura County, with the exception of the cities of Oxnard and Ventura. The goal of the UST Program is to protect public health, the environment, and groundwater. To accomplish this goal, EHD ensures that facilities with UST operations are properly permitted and meet applicable monitoring requirements. This is accomplished during plan check and inspection activities. Each UST site



is inspected annually to determine if the UST facility is in compliance with all applicable sections of the *California Health and Safety Code* Chapter 6.7 and *California Code of Regulations* Title 23.

The Ventura County Environmental Health Division also administers the Medical Waste Program and the Body Art Program, and has emergency on-call staff available to respond to hazardous and medical waste incidents or releases.

Ventura County Integrated Waste Management Division (IWMD) – Household Hazardous Waste. Residential households generate hazardous wastes that must be properly disposed, such as latex paint, batteries, electronic waste, fluorescent lights, solvents, cleaners, oils, pool chemicals, and medications. The Ventura County IWMD administers the Household Hazardous Waste (HHW) collection program and the operation of the Pollution Prevention Center, a permanent HHW collection facility that specifically serves residents of the unincorporated area and the cities of Ojai, Santa Paula, and Fillmore. The County maintains information on permitted household hazardous waste facilities for residents to find out where to drop off various types of household hazardous waste. The County holds monthly household hazardous waste collection events at the County's Pollution Prevention Center.

Ventura County Fire Department (VCFD). VCFD serves the communities of Camarillo, Moorpark, Ojai, Port Hueneme, Santa Paula, Simi Valley, and Thousand Oaks. VCFD provides all-risk services including Fire Suppression, Rescue, Emergency Medical, Hazardous Materials, Urban Search and Rescue (USAR), Water Rescue, Operational Training, Fire Prevention, Investigation, Community Education, Community Emergency Response Teams (CERT), and Public Information.

All VCFD fire stations have a staffed fire engine in service. At strategic fire stations throughout the county, the VCFD staffs a ladder truck along with a fire engine. Fire engines attack a fire; ladder trucks provide support to the fire attack crew. All apparatus are equipped to deliver emergency medical care. Some apparatus are staffed with emergency medical technicians (EMTs) to provide basic life support (BLS), while other apparatus are staffed with paramedics to deliver advanced life support (ALS). In addition, the department provides ALS services through the use of staffed paramedic squads.

The VCFD also maintains other pieces of specialized apparatus throughout the county. The on-duty crew at the station will staff and operate these specialized units when needed.

Santa Paula Municipal Code. The Municipal Code includes land use and building regulations that mitigate potential impacts related to hazardous materials, most notably Title XVI, Sec. 16.42.040 (Hazardous Materials).



Aviation

Federal

FAR 77. Title 14, Regulation 49 of the *Code of Federal Regulations* includes Federal Aviation Regulation, Part 77 (FAR 77). FAR 77 establishes evaluation standards and notification requirements for objects affecting navigable airspace. This includes new construction as well as alterations to existing developments in the vicinity of airports.

FAR 77 allows the FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing possible adverse impacts to the safe and efficient use of navigable airspace. The regulations also require evaluation and determination about potential hazardous effects of proposed construction or alterations, identifies mitigating measures to enhance safe air navigation, and charts new potentially hazardous objects. FAR 77 establishes a series of “Imaginary Surfaces,” or horizontal and vertical planes, around airports to provide the dimensions within which objects are considered hazardous to airport operating procedures and/or air navigation. These surfaces cover every angle of approach and departure and are based on the specific dimensions, runway types, and operations of a given airport.⁹²

State

California Public Utilities Code. *Public Utilities Code* §21670 et seq. requires the County Board of Supervisors to establish an Airport Land Use Commission (ALUC) in each county with an airport operated for the benefit of the general public. The Code also sets forth the range of responsibilities, duties, and powers of the Commission. Instead of creating a new body to serve as the ALUC, state law allows the county to authorize an appropriately designated body to fulfill ALUC responsibilities. (§21670.1) The Board of Supervisors has designated the Ventura County Transportation Commission (VCTC) to act as the ALUC for Ventura County.

Public Utilities Code §21675 specifies that comprehensive land use plans shall provide for the orderly growth of each airport and the area surrounding the airport and safeguard the welfare of the inhabitants within the vicinity of the airport and the public in general. Section 21676 requires that local general plans within the planning boundary established by the airport land use commission be referred to ALUC for review and comment prior to adoption.⁹³

⁹² Ventura County 2040 General Plan Background Report, Public Review Draft, March 2017, p. 11-60

⁹³ Ventura County Airport Comprehensive Land Use Plan (2000), pp. 1-2 to 1-4



California Aviation System Plan-Policy Element. The California Aviation System Plan (CASP) Policy Element is the basis for implementing the State Aeronautics Act and identifying the Division of Aeronautics' role in the California Department of Transportation (Caltrans) mission, vision, and values for a multimodal, interregional, transportation system. The Policy Element is updated on approximately a 5-year cycle with the last update published in October 2011.⁹⁴

Local

Ventura County Airport Land Use Commission Airport Comprehensive Land Use Plan. Adopted in July 2000, the Airport Comprehensive Land Use Plan (CLUP) for Ventura County is intended to protect and promote the safety and welfare of residents near the military and public use airports in the county, as well as airport users, while promoting the continued operation of those airports. The plan seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents and to ensure that no structures or activities encroach upon or adversely affect the use of navigable airspace.

Santa Paula General Plan. The General Plan and the Municipal Code provide the means of assuring land use compatibility in the vicinity of the airport. The current Santa Paula General Plan designates two categories of airport land use: *Airport Operational* and *Airport-Related*. These two land use categories are described in the current Land Use Element as follows.

1. **Airport Operational.** The purpose of the Airport Operational land use designation is to provide an area to facilitate the operations of the airport. The uses permitted include runways and like facilities, communication facilities, terminal buildings, sale of aviation fuel and products, airplane rentals, charters, delivery services, flying schools, aircraft storage, hangers and tie-downs. The Airport Operational land use designation is limited to large parcels and should not be established on parcels to allow the expansion of the runway and hanger facilities. The length of runway and the height of the buildings within the approach and take-off zones should continue to be regulated.
2. **Airport-Related Use.** The purpose of the Airport-Related land use category is to supply commercial and industrial uses that complement and enhance the airport, but not necessarily the community as a whole. Uses in the Airport Related areas should be limited to airplane and related equipment sales, service stations, business offices, car rental agencies, restaurants, taxi stands, air photography, survey and mapping services, and other airport-related uses. Uses could include

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airplane repair and painting, parts manufacturing, and outdoor storage. Uses in this area must comply with airport safety zones and regulations that limit structures and land uses.

The proposed 2040 General Plan would replace these two land use categories with a single *Airport* category.

Santa Paula Municipal Code. Chapter 16.27 of the Municipal Code establishes special use regulations and development standards to ensure compatibility between the airport and surrounding land uses. These use restrictions and development standards are based on the County CLUP, a document that governs all aviation facilities in the county, and the State Aeronautics Program 1993 Airport Land Use Planning Handbook.

The following zones, three of which are overlay zones, are established to accommodate the operations of the airport while maintaining safety as a priority. These zones are also shown on the Zoning Map (see **Exhibit 4.9-1**).

1. **Airport Operational Zone (KO).** The purpose of the Airport Operational (KO) zone is to provide an area to facilitate airport operations. The zone applies to airport facilities that are open to the public and maintain a valid permit from the California Aeronautics Commission designating the facility as an airport available to the public, subject to airport administration regulations.
2. **Airport Safety Overlay Zone (KS).** The purpose of the Airport Safety (KS) overlay zone is to limit uses and restrict development within areas classified as the Runway Protection Zone, Outer Safety Zone, and Sideline Safety Zone, as identified for the Santa Paula Airport in the VCACLUP.

Within the KS Zone, subzones are established as follows:

- **KS-IS Inner Safety Subzone.** Inner safety subzones are located near each end of the airport runway. Each such subzone is 250 feet in width along a line parallel to and 200 feet beyond the designated threshold of the runway and flares uniformly to a width of 450 feet along a line parallel to and 1,200 feet beyond such threshold. The extended centerline of the runway bisects the subzone. This zone corresponds to the Runway Protection Zone (a.k.a. inner safety zone) for the Santa Paula Airport, identified in the VCACLUP.
- **KS-OS Outer Safety Subzone.** Outer safety subzones are located near each end of the airport runway. Each such subzone is 450 feet in width along a line parallel to and 1,200 feet beyond the designated threshold of the runway and flares uniformly to a width of 950 feet along a line parallel to and 3,700 feet beyond such threshold. The extended centerline of the runway bisects the



subzone. This zone corresponds to the Outer Safety Zone for the Santa Paula Airport, identified in the VCACLUP.

3. **Airport-Influenced Overlay Zone (KI).** The purpose of the Airport-Influenced (KI) overlay zone is to require less-intense uses and development within the area in which airplane traffic is concentrated. The boundaries of the (KI) overlay correspond to the boundaries of the Traffic Pattern Zone, as identified for the Santa Paula Airport in the VCACLUP.

Emergency Response

Federal

Disaster Mitigation Act (DMA) of 2000. The DMA (Public Law 106-390) provides the legal basis for FEMA mitigation planning requirements for State, local and Indian Tribal governments as a condition of mitigation grant assistance. The DMA emphasizes the need for state, local, and Indian Tribal entities to closely coordinate mitigation planning and implementation efforts. The requirement for a State mitigation plan is continued as a condition of disaster assistance, adding incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans. DMA 2000 also established a new requirement for local mitigation plans.

Federal Emergency Management Agency. The primary mission of the Federal Emergency Management Agency is to reduce the loss of life and property and to protect the nation from all hazards, including natural disasters, acts of terrorism, and other man-made disasters, by leading and supporting a risk-based, comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation.

State

Disaster Mitigation Act. The federal Disaster Mitigation Act of 2000 requires a state mitigation plan as a condition of disaster assistance, adding incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Disaster Mitigation Act also established a new requirement for local mitigation plans.

California Multi-Hazard Mitigation Plan. The State of California Multi-Hazard Mitigation Plan, also known as the State Hazard Mitigation Plan (SHMP), was approved by FEMA in 2013. The SHMP outlines present and planned activities to address natural hazards. The



adoption of the SHMP qualifies the State of California for federal funds in the event of a disaster under the Disaster Mitigation Act of 2000. The SHMP provides goals and strategies which address minimization of risks associated with natural hazards and response to disaster situations.

California Emergency Services Act. The California Emergency Services Act (Government Code Chapter 7, Sections 8550-8668). is intended to ensure that preparations within the state will be adequate to deal with the effects of natural, manmade, or war-caused emergencies. The act provides for emergency powers to be conferred upon the Governor and local executives; the establishment of the State Office of Emergency Services; the coordination and direction of state entities during an emergency, and mutual aid by the State and its departments and agencies, as well as political subdivisions.

Local

Ventura County Multi-Hazard Mitigation Plan (MHMP). This 2015 MHMP addresses the local mitigation planning requirements of the Disaster Mitigation Act of 2000 for unincorporated Ventura County and other local participants (including the City of Santa Paula). The MHMP includes an analysis of vulnerability, a capability assessment for hazard mitigation, a mitigation strategy for reducing potential losses identified in the vulnerability analysis.

Santa Paula Emergency Operations Plan (EOP). In 2013 the City adopted an Emergency Operations Plan, which addresses the City's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The plan does not address normal day-to-day emergencies or routine procedures used in coping with such emergencies. Instead, the operational concepts reflected in the EOP focus on potential large-scale disasters that can generate unique situations requiring unusual emergency responses. The EOP describes procedures for establishing evacuation routes and evacuation center locations as necessary depending on the nature of the emergency event.

4.9-2 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the Proposed Project would have significant impact from hazards or hazardous materials if it would cause any of the following conditions to occur:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (Impact HAZ-1);



- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (Impact HAZ-1);
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (Impact HAZ-2);
- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to *Government Code* §65962.5 and, as a result, would create a significant hazard to the public or the environment (Impact HAZ-3);
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would result in a safety hazard or excessive noise for people residing or working in the project area (Impact HAZ-4); (the issue of aircraft noise is addressed in **Section 4.13 – Noise, Impact N-4**)
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (Impact HAZ-5); and
- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? (this topic is addressed in **Section 4.19 - Wildfire**)

4.9-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to hazards and hazardous materials expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through upset and accidents involving the release of hazardous materials

Impact Discussion

Project Impacts. New developments under the proposed General Plan may use, transport, and dispose of hazardous materials, including fuels and oils used by construction equipment. Federal, State and local regulations establish extensive requirements regarding the use, transportation, disposal, and accidental release of hazardous materials. Facilities that handle



hazardous materials are required to obtain a hazardous materials permit and are subject to periodic inspection, which reduces risks of an accident that could release hazardous substances into environment.

Existing regulations require businesses handling or storing amounts of hazardous materials above specified thresholds to prepare a hazardous materials business plan (HMBP), which must include a summary of business activities, owner and operator emergency contacts, the type and quantity of reportable hazardous materials, a site map, emergency response procedures, and an employee training program. The Ventura County Environmental Health Division/Certified Unified Program Agency (CUPA) is responsible for HMBP program compliance in Santa Paula and surrounding unincorporated areas.

Underground storage tanks (USTs) also require a permit from the Ventura County Environmental Health Division (VCEHD). VCEHD ensures that facilities with UST operations meet applicable monitoring requirements and comply with all applicable safety regulations. VCEHD also administers the Medical Waste Program and the Body Art Program and has emergency on-call staff available to respond to hazardous and medical waste incidents or releases.

Major oil pipelines carry crude oil and natural gas in Ventura County, generally along highways and rail lines. The locations of oil and gas pipelines are mapped on Ventura County's Geographic Information System for planning and emergency response purposes. This information is proprietary and access is limited in order to protect public safety.

The proposed General Plan Map generally designates heavier Industrial uses that may be more likely to use hazardous materials in locations that are not adjacent to sensitive uses such as residential and schools.

The proposed General Plan policies and programs listed in **Table 4.9-2** would require compliance with Federal, State, and local regulations and substantially reduce risks associated with hazardous materials to a level that is less than significant.

Table 4.9-2 General Plan Policies and Programs That Reduce Risks From Hazardous Materials

Policies	Programs
HPS 4.1. Compliance with hazardous materials regulations. All use, storage, transportation and disposal of hazardous materials in Santa Paula, including the management of underground and above-ground storage tanks, shall conform to federal, State and County regulations. Projects that would reasonably be anticipated to emit hazardous air emissions or handle extremely	HPS 4.a. Hazardous materials regulations. Review City regulations, procedures and sources of information regarding the use, storage, transportation and disposal of hazardous materials, and the location and operation of petroleum facilities, on an annual basis and revise as necessary to ensure that they reflect current federal, state and county regulations. HPS 4.b. County Hazardous Waste Management Plan. Cooperate with the County Department of Environmental Health Services (DEHS)

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Policies	Programs
<p>hazardous substances within one-quarter mile of a school shall not be approved.</p> <p>HPS 4.2. Compliance with petroleum regulations. Petroleum production, storage, and pipeline facilities and operations, including abandonment, shall comply with all applicable regulations in order to minimize risks to public safety. Wells, storage tanks and pipelines should be located away from sensitive uses such as residences, hospitals, and schools.</p> <p>PSU 8.1. Facilitate the safe and efficient transmission of energy. Ensure that energy transmission facilities, such as high voltage electrical transmission lines and pipelines, are developed and maintained in a safe manner that avoids conflicts with other land uses in the city.</p>	<p>in preparing and updating the County Hazardous Waste Management Plan (CHWMP).</p> <p>HPS 4.c. Development review. As part of the development review process for new developments that handle hazardous materials or petroleum products, consult with DEHS and require applicants to demonstrate conformance with all applicable hazardous materials regulations and identify appropriate mitigation measures. When development is proposed in an area of previous or current oil operations, the City shall consult with the California Division of Oil, Gas, and Geothermal Resources (DOGGR) and require the project to comply with DOGGR recommendations to protect public health and safety.</p> <p>HPS 4.d. Existing facilities. Work cooperatively with County DEHS to ensure that existing facilities that use, store, transport or dispose of hazardous materials comply with existing regulations.</p> <p>PSU 8.a. Coordination with energy utilities. Coordinate with electrical utilities and the owners of petroleum pipelines when new or expanded transmission facilities are proposed to avoid conflicts with adjacent land uses and support “dig once” policies.</p> <p>PSU 8.b. Development review. As part of the review process for new developments, require applicants to demonstrate that appropriate separation distances will be maintained from existing electrical transmission lines or petroleum pipelines to ensure public safety.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to the use, transport, disposal or accidental release of hazardous materials.⁹⁵ However, the proposed policies and programs together with required compliance with existing laws and regulations would substantially reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

⁹⁵ SCAG 2016-2040 RTP/SCS PEIR, p. 3.9-41 & 42



Impact HAZ-2: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school

Impact Discussion

Project Impacts. The proposed General Plan identifies potential locations for new schools in the East Area 1 Specific Plan and in the Adams Canyon Expansion Area. The proposed Land Use Plan designates areas for *Mixed-Use Commercial/Light Industrial* use within one-quarter mile of land designated for *Civic-School* use in the East Area 1 Specific Plan. Therefore, the potential exists for businesses that handle hazardous materials to be located within one-quarter mile of a future school in East Area 1. No industrial uses are designated within the Adams Canyon Expansion Area; therefore, it is not anticipated that hazardous materials would be handled near a future school in Adams Canyon.

Prior to construction of a new public school, *California Education Code* §17210 et seq. requires evaluation of hazardous materials sites, facilities that emit hazardous air emissions, handle hazardous or acutely hazardous materials, substances, or waste. Based on the evaluation the school district may determine whether the site is appropriate for school use. This requirement, together with the proposed General Plan policies and programs listed in **Table 4.9-2** above requiring compliance with Federal, State, and local regulations would substantially reduce risks associated with hazardous materials near schools to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to hazardous materials near schools.⁹⁶ However, the proposed policies and programs together with required compliance with existing laws and regulations would substantially reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measure

None required

Level of Significance after Mitigation

Less than significant

⁹⁶ SCAG 2016-2040 RTP/SCS PEIR, p. 3.9-42



Impact HAZ-3: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment

Impact Discussion

Project Impacts. As of 2017 there were a number of sites in Santa Paula listed in the databases that are compiled pursuant to *Government Code* §65962.5 (the “Cortese List”), such as the EnviroStor and GeoTracker databases. Future development under the 2040 General Plan may be proposed on sites where hazardous materials have been used or where releases have occurred. The requirements described in the Regulatory Setting section above, along with the proposed 2040 General Plan policies and programs listed in **Table 4.9-2** require proper management and, if necessary, cleanup of any contamination prior to development or reuse and would substantially reduce risks to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to hazardous materials sites would be less than significant.⁹⁷ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Less than significant

Mitigation Measure

None required

Level of Significance after Mitigation

Less than significant

Impact HAZ-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport or within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Impact Discussion

Project Impacts. Santa Paula Airport, a general aviation facility privately owned and operated by the Santa Paula Airport Association, is located in the south-central portion of the city. The airport property is designated *Airport* in the proposed Land Use Plan (**Exhibit 3.4-1** and

⁹⁷ SCAG 2016-2040 RTP/SCS PEIR, p. 3.9-42



Figure LU-1 of the Land Use Element). Risks associated with Santa Paula Airport include those to people and property located near the airport and persons aboard an aircraft. Risk is reduced through land use policies and regulations that limit the types of uses and number of people within crash hazard zones and by protecting airspace from land uses that could create flight hazards.

The Airport Comprehensive Land Use Plan (CLUP) for Ventura County is intended to protect and promote the safety and welfare of residents near military and public use airports in the county, as well as airport users, while promoting the continued operation of those airports. The CLUP seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that structures and activities do not encroach upon or adversely affect the use of navigable airspace. Air safety zones applicable to Santa Paula Airport are designated in the CLUP as described in the Regulatory Setting section above and are shown in **Exhibit 4.9-1** and Figure 5-7 of the draft Hazards and Public Safety Element.

On the east side of Santa Paula airport south of Santa Maria Street and west of S. Mountain Road, existing non-conforming residential uses are located within the Inner Safety Zone and Outer Safety Zone. These properties are designated *Air Park Specific Plan* in both the current and the proposed Land Use Map (**Exhibit 3.4-1**). In 2004 the Ventura County Airport Land Use Commission (ALUC) determined that the Air Park Specific Plan, a proposed airplane hangar/residential condominium development that encompasses the property currently occupied by these non-conforming residential uses, was consistent with the Airport Comprehensive Land Use Plan for Ventura County under two conditions.

1. The execution of an aviation agreement with the Santa Paula Airport.
2. Ensuring that the project is consistent with any of California's Division of Aeronautics requirements relating to inner turning zone of the airport.⁹⁸

The current and proposed Air Park Specific Plan land use designation helps to facilitate the amortization of existing non-conforming residential uses in the Inner and Outer Safety Zones. This designation, together with the proposed General Plan policies and programs listed in **Table 4.9-3** would substantially reduce risks due to aircraft operations on the east side of the airport to a level that is less than significant.

98 City of Santa Paula, *Santa Paula Air Park Specific Plan 2004-CDP-13, Final Initial Study/Mitigated Negative Declaration*, p. 3-23



Table 4.9-3 General Plan Policies and Programs That Reduce Risks from Santa Paula Airport

Policies	Programs
HPS 5.1. CLUP consistency. Use and development of properties in the vicinity of Santa Paula Airport shall be consistent with the Ventura County Airport Comprehensive Land Use Plan.	<p>HPS 5.a. CLUP compatibility. Work with Santa Paula Airport to ensure conformance with the land use guidelines for safety compatibility outlined in the Ventura County Airport Comprehensive Land Use Plan.</p> <p>HPS 5.b. Runway overrun extension. Pursue extension of the runway overruns when land becomes available.</p> <p>HPS 5.c. Development review. As part of the development review process for applications within the vicinity of Santa Paula Airport, assist applicants in demonstrating conformance with the CLUP and identify appropriate mitigation measures.</p> <p>HPS 5.d Nonconforming uses. Encourage the modification or replacement of legal nonconforming uses that are inconsistent with the CLUP in a manner that reduces or eliminates incompatibilities to the greatest extent feasible in accordance with SPMC Chapter 16.110.</p>

To the west of the airport, the eastern portion of Rancho Santa Paula Mobile Home Park, which is located west of Steckel Drive and south of SR-126, is within the Outer Safety Zone. According to the CLUP, all residential uses are classified as *Unacceptable* within an Outer Safety Zone.

Any existing structures or uses that were lawfully established or constructed prior to the adoption of the CLUP and that are inconsistent with current air safety zones are considered legal nonconforming uses and are subject to the regulations contained in Chapter 16.110 - Nonconformities of the Development Code (SPMC Title XVI). Those regulations are intended to encourage the city's continuing improvement by limiting the extent to which nonconforming structures and uses may continue to be used, expanded, or replaced, while improving the health, safety, and welfare of residents without creating an economic hardship for individual property or business owners.

Conformance with proposed Hazards and Public Safety Element Program HPS 5.d would help to facilitate the modification or replacement of nonconforming uses such as Rancho Santa Paula Mobile Home Park in order to reduce or eliminate incompatibilities with the CLUP. However, the proposed 2040 General Plan would not ensure that this incompatibility will be eliminated. Therefore, this existing incompatibility is considered a significant adverse impact.

Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to aircraft safety would be less than significant.⁹⁹ The proposed 2040

⁹⁹ SCAG 2016-2040 RTP/SCS PEIR, p. 3.9-33 & 34



General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs

Level of Significance after Mitigation

Significant impact

Impact HAZ-5: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

Impact Discussion

Project Impacts. As discussed in **Section 4.17**, improvements to the circulation network are proposed as part of the 2040 General Plan that would improve access and mobility for normal travel as well as emergency operations. The City’s Emergency Operations Plan includes emergency preparation measures and procedures to be followed during extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The EOP also describes procedures for establishing evacuation routes and evacuation center locations as appropriate depending on the nature and location of the emergency event. The proposed General Plan would establish effective emergency response policies and programs as shown in **Table 4.9-4**, which would substantially reduce risks to a level that is less than significant.

Table 4.9-4 General Plan Policies and Programs Related to Emergency Response Plans

Policies	Programs
LU 3.11 Public facilities. Designate sufficient land in appropriate locations for governmental facilities, schools, libraries, health care, social services, critical public safety facilities, and other civic uses.	HPS 2.f Disaster recovery. Review the City’s Emergency Response Plan to ensure that evacuation routes will be usable during major flood events.
HPS 2.5 Emergency response. Ensure that the City’s Emergency Response Plan includes timely public notification of predicted flood events and methods to ensure structural and operational integrity of essential public facilities and evacuation protocols during flood events.	HPS 3.c Development review. As part of the development review process, assist applicants in demonstrating conformance with all applicable fire protection regulations and identify appropriate mitigation measures. For any proposed development within a Very High Fire Hazard Severity Zone, require preparation of a site-specific Fire Protection Plan in compliance with applicable State regulations (including Government Code Sec. 51182) and VCFD ordinances, standards and guidelines to address wildland fire prevention, maintenance and operational measures, including community fire breaks, visible home and street addressing and signage, and simultaneous ingress of emergency vehicles and egress of evacuees during a wildfire
PSU 3.1 Emergency planning, response and recovery. Proactively plan for an effective response to	

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Policies	Programs
emergency situations such as earthquakes, floods, wildfires, hazardous materials releases, and disaster recovery in cooperation with other Federal, State and local agencies.	<p>event. If supplemental stored water is necessary to provide adequate fire protection, require that water tanks on private property are accessible to the Fire Department.</p> <p>HPS 3.f Emergency Operations Plan. Ensure that effective measures to respond to wildland fire risks are included in the City's Emergency Operations Plan, including evacuation when necessary (Annex A of the City Emergency Operations Plan). Evaluate areas of the city within the Very High Fire Hazard Severity Zone and identify any areas with inadequate access/evacuation routes. If such areas exist, develop mitigation measures or improvement plans.</p> <p>HPS 3.i Public outreach. Promote public outreach regarding defensible space and evacuation routes in high fire hazard areas, including specific information targeted to at-risk populations such as the elderly and persons with disabilities.</p> <p>PSU 2.b Land planning and development review. As part of the development review process:</p> <ul style="list-style-type: none"> - Require new developments to contribute on a fair-share basis to the provision of fire protection facilities required to serve the development. - Assist applicants in demonstrating compliance with fire protection regulations and standards, including availability of adequate water supply for fire suppression, siting of structures, site access, use of fire-retardant vegetation, and setbacks from natural vegetation. <p>PSU 3.a Emergency Operations Plan. Maintain and update the City's Emergency Operations Plan on a regular basis to ensure that the City is well-prepared to effectively deal with potential disaster events.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to emergency response or evacuation plans.¹⁰⁰ However, the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

¹⁰⁰ SCAG 2016-2040 RTP/SCS PEIR, p. 3.9-42



4.10 Hydrology and Water Quality

This section addresses the issues of surface and groundwater quality, flood hazards (including dam failure, seiche and tsunami) and drainage facilities. The related topic of water supply is addressed in **Section 4.18 – Utilities and Service Systems**.

4.10-1 Setting

Existing Physical Conditions

Water Quality

The Santa Paula Planning Area is entirely within the watershed of the Santa Clara River and its tributaries. The headwaters of the Santa Clara River is at Pacifico Mountain in the San Gabriel Mountains and it flows in a generally western direction for approximately 84 miles through Tie Canyon, Aliso Canyon, Soledad Canyon, the Santa Clarita Valley, the Santa Clara River Valley, and the Oxnard Plain before discharging to the Pacific Ocean near the Ventura Harbor. The Santa Clara River and tributary system has a watershed area of about 1,634 square miles. Approximately 40% of the watershed is in Los Angeles County, with the remaining 60% in Ventura County. The Santa Clara River is the largest river system in Southern California remaining in a relatively natural state.

The Los Angeles RWQCB Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties¹⁰¹ identifies beneficial uses for the Santa Clara River Watershed, and permit programs and TMDLs for bacteria and chloride have been developed to protect these beneficial uses. Identified impairments in the Santa Clara River and its tributaries include chloride, pH, boron, sulfates, total dissolved solids, toxicity, as well as multiple chemicals generally referred to as “Chem A.”

Groundwater

The Santa Paula Groundwater Basin, located along the Santa Clara River between Saticoy and the eastern City limits, is the city’s sole source of potable water supply. A 1996 groundwater basin adjudication allocates the use of groundwater between the City of Ventura and the Santa Paula Basin Pumpers Association (SPBPA), which is a consortium of water users in the Santa Paula area that includes the City and farming interests. Currently, members of SPBPA have a cumulative allocation to pump on average 27,515 acre-feet per year (AFY). The City of Santa Paula has an allocation to pump on average 5,488 AFY.

101 https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.shtml



The major concerns affecting groundwater quality in the basin are the presence of elevated concentrations of manganese, iron, sulfate, and total dissolved solids (TDS). To address these concerns, a centralized water conditioning facility (Steckel Plant) was completed in 2000 to remove manganese and iron from up to 10 million gallons of water per day (MGD).

Flood Hazards and Stormwater Drainage

In areas such as Ventura County that do not have extended periods of below-freezing temperatures or significant snowfall, floods usually occur during the season of highest precipitation or during heavy rainfalls after prolonged dry periods. Ventura County is mostly dry during the late spring, summer, and early fall, and receives most of its rain during the winter months. The rainfall season extends from October 1 through April 15, with approximately 95% of the annual rainfall occurring during this period. The prevailing weather patterns during the winter and the orientation of the mountain ranges in the northern half of the county combine to produce extremely high-intensity rainfall.¹⁰²

Development in Santa Paula is primarily on the Santa Clara River Valley floor and adjacent slopes of less than 10%. The watershed is defined by the Topatopa Mountains to the north (which includes Sulphur Mountain and Santa Paula Peak) and South Mountain to the south. The Santa Clara River is the major drainage feature through the city. This watercourse drains from the eastern limit of the Planning Area, westerly through the Oxnard Plain and into the Pacific Ocean. Major tributaries of the Santa Clara River within the Planning Area include Santa Paula Creek, Adams Barranca, Fagan Barranca, and Timber Canyon located east of Santa Paula Canyon.¹⁰³

The Ventura County Watershed Protection District (VCWPD), formerly the Ventura County Flood Control District, was formed to protect watercourses, watersheds, public highways, life, and property from damage or destruction from floodwaters. The VCWPD has authority over “redline” channels, which are those containing runoff with a peak flow rate of 500 cubic feet per second (cfs) or more during a 100-year storm (**Exhibit 4.10-1**).¹⁰⁴

102 Ventura County 2040 General Plan Background Report, Revised Public Review Draft, January 2018, p. 11-21

103 Santa Paula General Plan FEIR, 1998, p. F-4.7-1

104 <http://vcwatershed.net/publicMaps/Permitting/>



Source: Ventura County Watershed Protection District, 2018

Exhibit 4.10-1 Ventura County Watershed Protection District Redline Channels



The VCWPD maintains flood control facilities in four zones. Santa Paula is located within Zone 2 (Santa Clara Watershed Zone). This zone follows the boundaries of the Santa Clara River Watershed and the local coastal drainages in the cities of San Buenaventura and Oxnard and the drainages located in Lockwood Valley. In addition to Santa Paula, Zone 2 includes the cities and communities of Piru, Fillmore, Ventura, El Rio, Saticoy, Oxnard, Port Hueneme, and Nyeland Acres. The major waterways in this zone include the Santa Clara River and its tributaries, and various Oxnard Plain drains.

VCWPD has the authority to maintain and construct flood control facilities on all major channels, including Santa Clara River, Todd Barranca, Cummings Road Drain, Briggs Road Drain, Haines Barranca, Adams Barranca, Saltmarsh Canyon, Sisar Creek, Camp Bartlett Creek, Peck Road Drain, Fagan Canyon, Santa Paula Creek, Magnolia Drive Creek, Mud Creek Canyon, Anlauf Canyon, Orcutt Canyon, Timber Canyon, O'Leary Creek, and Balcom Canyon Wash. The network of tributary storm drain trunks and laterals that collect and convey surface water from the urban areas to the major channels is the responsibility of the City of Santa Paula Public Works Department.

The VCWPD ensures compliance with the National Flood Insurance Program through permit review of structures and evaluation of site plans for developments in floodplains. Cities serve as the floodplain managers for each designated sphere of influence.

FEMA establishes base flood elevations for 100-year and 500-year flood events. The 100-year flood zone is defined as the area that could be inundated by the flood having a 1% probability of occurring in any given year. The 500-year flood is defined as having a 0.2% probability of occurring in any given year.

Exhibit 4.10-2 shows areas within the Planning Area that are predicted to be inundated by a 100- or 500-year flood. According to the 2015 Ventura County Multi-Hazard Mitigation Plan,¹⁰⁵ 2,197 housing units (31%) and 5 critical facilities are within a 100-year floodplain, while 1,777 housing units (25%) and 8 critical facilities are within a 500-year floodplain in Santa Paula.

To reduce potential flooding, the Santa Paula Creek Flood Control Project was constructed by the U.S. Army Corps of Engineers (USACE), Los Angeles District, in Santa Paula Creek between the confluence with the Santa Clara River and Stewart's Crossing. Construction of the Flood Risk Management Channel (FRMC) occurred in three phases between 1997 and 2002.

¹⁰⁵ <http://www.venturacountymhmp.com/documents>, Appendix N, p. N-3

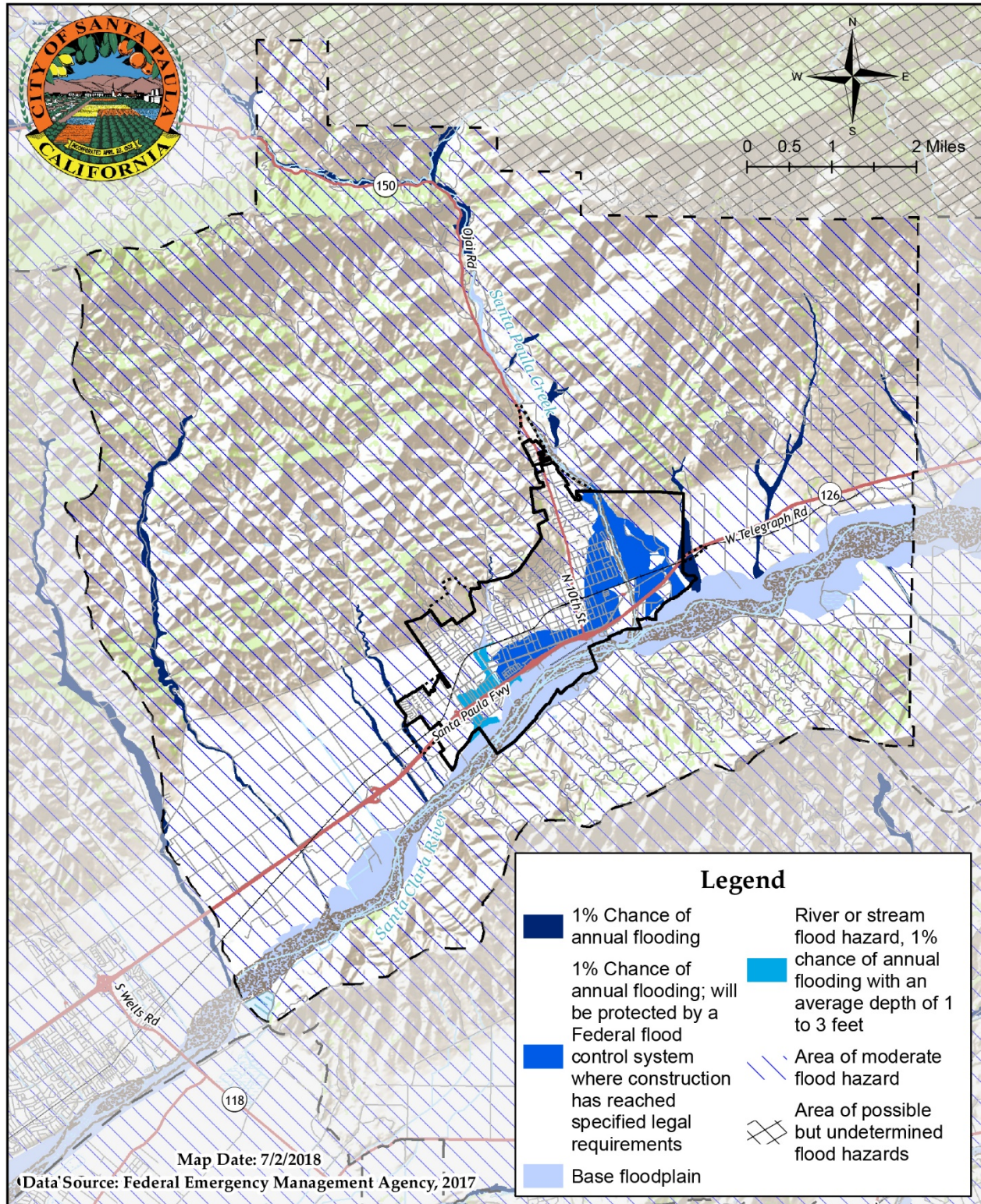


Exhibit 4.10-2 Flood Hazard Zones



The FRMC was designed to provide flood protection from a 28,000-cubic-feet-per-second (cfs) design-year storm. In 2009/2010, the Corps removed approximately 300,000 cubic yards of materials from the FRMC. The materials removal action was needed largely as a result of sediments that were deposited from a flood series that had a peak flow of 27,500 cfs in the winter of 2004-2005 (the largest flow on record for Santa Paula Creek). Subsequent hydrology studies completed by the VCWPD and the USACE determined that the 100-year storm would result in 39,400 cfs in Santa Paula Creek. The City is coordinating with the VCWPD and the USACE to identify additional improvements that may be necessary to provide flood protection from Santa Paula Creek.

For Santa Paula Creek, the primary risk management strategy is to maintain the design flow capacity and adequate functioning of the Santa Paula Creek Flood Control Project. A supporting strategy is to require new development in areas adjacent to the channel within the 100-year flood zone to be constructed on new fill sufficient to raise the structures at least one-foot above the anticipated flood level.

VCWPD and the City of Santa Paula are currently working with project proponents and FEMA on the following updated flood risk mapping studies in the Santa Paula Planning Area.

- Santa Clara River Watershed Flood Insurance Study
- Orcutt Canyon Flood Insurance Study

In addition, the City of Santa Paula Engineering Department and VCWPD are currently undertaking technical reviews of the following Conditional Letters of Map Revisions submitted by project proponents.

- Clearwater/Pierce Development CLOMR (APNs: 107-0-011-21; -22)
- Santa Maria Street Industrial Park LOMR (APN: 104-0-140-415)
- Santa Paula Creek Flood Control Project LOMR

For the Santa Clara River, the primary risk management strategy is to restrict land uses within the flood plain to agriculture, open space, or other uses that would realize minimal damage during a major flood event. A supporting strategy is to maintain the levee system to constrain the northern extent of a major flood event. While flooding in the Santa Clara River could be destructive, severe damage or extensive loss of life would not be anticipated from a 100-year storm event.

The East Area 1 Specific Plan and Gateway Specific Plan (East Area 2) require that development areas be elevated above the 100-year flood zone as defined by FEMA.



Future development in the Adams Canyon and Fagan Canyon Expansion Areas will require the preparation of specific plans containing detailed drainage plans that are compatible with the City's existing storm water drainage system and NPDES permit requirements. In both Adams Canyon and Fagan Canyon, the 100-year flood zones are within the banks of existing drainage channels.

A deficiency study confirmed the need for raising floodwalls in Fagan Canyon upstream of Main Street and enlarging the Santa Paula Street culvert to eliminate overflow. These improvements were designed several years ago, but funding for construction was not available. Construction of these improvements has been identified as a high priority for mitigating future flood damage.

In 2008 a Storm Drain Master Plan was prepared to determine storm water drainage patterns within the city, to evaluate existing drainage systems, and to recommend methods to correct deficiencies.

The proposed drainage facilities recommended in the Storm Drain Master Plan were primarily intended to relieve flooding within severe problem areas that experience frequent flooding. The facilities proposed in the Master Plan to address those problem areas are shown in **Exhibit 4.10-3**. The City's Capital Improvement Program (CIP) prioritizes storm drain improvements as recommended by the Storm Drain Master Plan. The Foothill/Hardison/Cameron Storm Drain Improvement Project and the Fourth Street Storm Drain Improvement Project are identified in the current CIP as the major priority improvement projects.

Dam Failure Hazards

Dam failure may result from a variety of natural or human-caused events. Factors contributing to dam failure may include structural deficiencies from poor initial design or construction, lack of maintenance or repair, the gradual weakening of the dam through the normal aging process, or seismic activity.

There is no record of a dam failure in Ventura County; however, the 1928 collapse of St. Francis Dam in San Francisquito Canyon, located within the Santa Clara River watershed about 10 miles north of Santa Clarita in Los Angeles County, resulted in a wall of water estimated to be 25 feet high when it reached Santa Paula. Almost everything in its path was destroyed, and nearly 500 people were killed in that event. Potential dam failure inundation areas in Ventura County are shown in **Exhibit 4.10-4**.

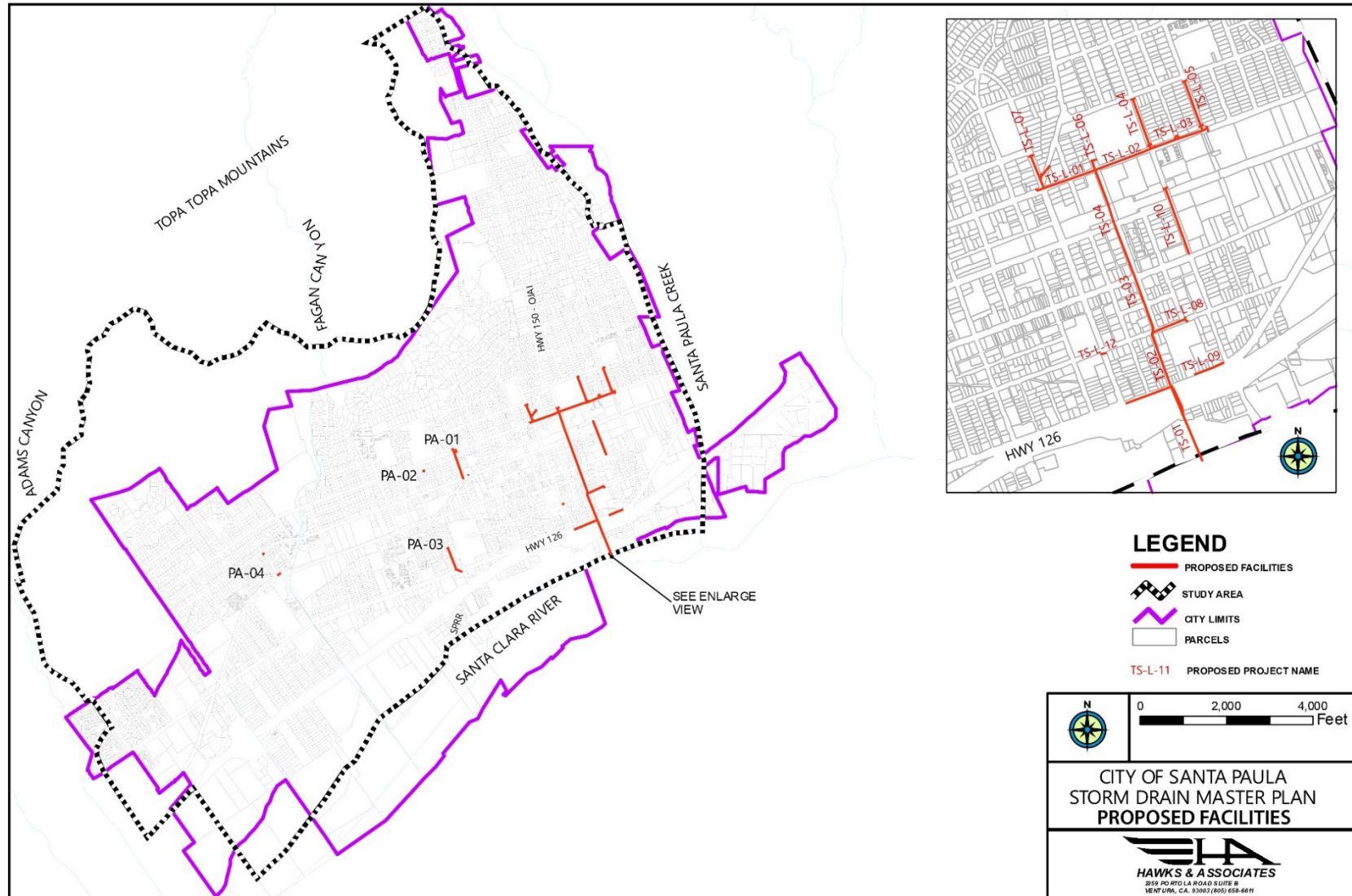


Exhibit 4.10-3 Proposed Drainage Facility Improvements

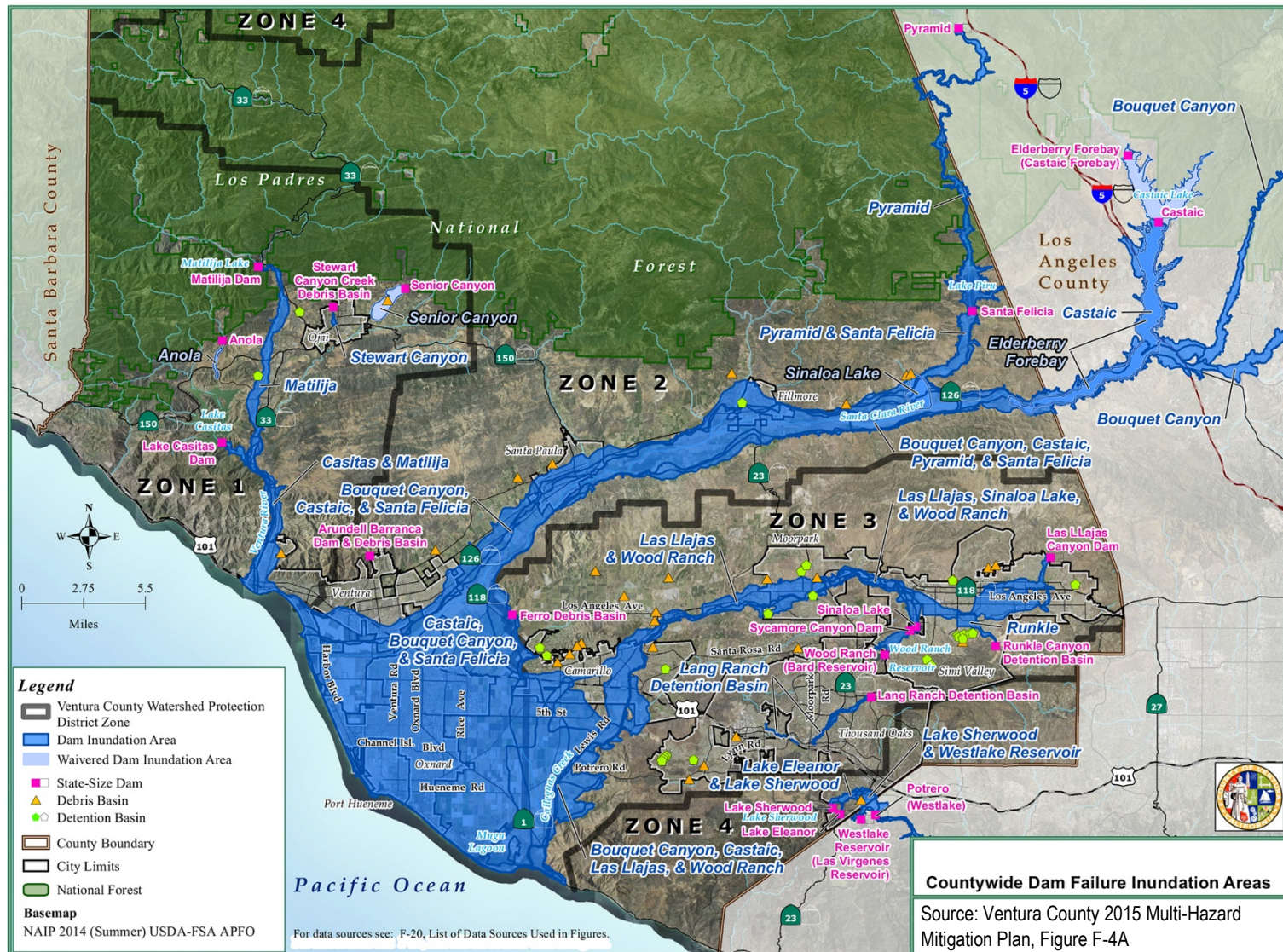


Exhibit 4.10-4 Dam Failure Inundation Areas



Seiche and Tsunami Hazards

A *seiche* is a wave in a body of water, such as a lake or reservoir, typically caused by strong winds or earthquakes. A *tsunami* is an ocean wave caused by an earthquake. Since there are no large lakes or reservoirs in or near Santa Paula, and the city is located approximately 15 miles inland from the Pacific Ocean, the risk of flooding due to seiche or tsunami is not considered significant.

Regulatory Framework

Federal

Clean Water Act. The Federal Water Pollution Control Act, known as the Clean Water Act (33 United States Code [USC] §§1251 et seq.), is the principal federal statute for water quality protection. The Clean Water Act requires the state to adopt water quality standards and to submit those standards for approval by the U.S. Environmental Protection Agency (EPA). For point source discharges to surface water, the Clean Water Act authorizes the EPA and/or approved states (such as California) to administer the National Pollutant Discharge Elimination System (NPDES) program. Clean Water Act section 303(d) requires states to list surface waters not attaining (or not expected to attain) water quality standards after the application of technology-based effluent limits; and, states normally must prepare and implement a Total Maximum Daily Load for all waters on the Clean Water Act section 303(d) impaired waters. The Clean Water Act also establishes a loan program – the State Revolving Fund – for the implementation of water quality improvement projects, including Non-Point Source (NPS) projects.

Federal Emergency Management Agency (FEMA). FEMA is the federal agency that oversees floodplains and manages the National Flood Insurance Program (NFIP), as adopted under the National Flood Insurance Act of 1968. FEMA's regulations govern the delineation of floodplains and establish requirements for floodplain management. FEMA prepares Digital Flood Insurance Rate Maps (DFIRMs) indicate the regulatory floodplain to assist communities with land use and floodplain management decisions to meet the requirements of the NFIP. The most recent DFIRMs for Santa Paula were published in 2015.

National Flood Insurance Program (NFIP). The regulations of the NFIP, which is administered by FEMA, require that communities adopt land use restrictions for the 100-year floodplain to qualify for federally subsidized insurance. The NFIP was enabled by the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973. The types of restrictions communities must adopt are listed in Title 44 *Code of Federal Regulations*, §§59-70.



While participation in the NFIP is not mandatory, flood insurance within identified “special flood hazard” areas is a prerequisite for receiving mortgages or construction loans from federally regulated lending institutions. Disaster assistance is not available to public agencies in hazard areas if they do not participate and remain compliant in the program. The City is a participating community in the NFIP and qualifies for assistance in the event of a declared natural disaster.

Community Rating System for Flood Control. The Community Rating System (CRS) is administered by FEMA.¹⁰⁶ The program offers financial incentives to cities and counties that voluntarily exceed the minimum requirements of the NFIP. The three goals of the CRS are: 1) to reduce and avoid flood damage to insurable property; 2) to strengthen and support the insurance aspects of the NFIP; and 3) to foster comprehensive flood plan management. The CRS includes activities in which communities can participate to earn CRS points, such as public outreach and education on flood prevention measures, preserving open space, maintaining special certifications for staff members as Certified Floodplain Managers, removing debris and sediment from flood control channels, and adoption of an All-Hazards Mitigation Plan. Each community receives a Class Rating based on the number of points earned, and the number of points a community has earned determines if a discount is available to property owners on their flood insurance policies. As of 2016, 5% of all NFIP member communities participate in the CRS program, and 15% of all NFIP California communities participate in the program.

CRS Classes range from 1 to 9, with Class 1 representing the highest (best) class. On May 1, 2016, Ventura County received a Class 6 rating, and consequently, properties within a floodplain in the unincorporated areas of Ventura County are eligible for a 20% premium discount on flood insurance. Santa Paula does not currently participate in the CRS program.

Disaster Mitigation Act of 2000 (DMA 2000). (Please see discussion above in the Geology and Soils section on page 4.8-4.)

State

Porter-Cologne Act. The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (*California Water Code* §13000 et seq.), the policy of the state is as follows:

¹⁰⁶ <http://www.vcfloodinfo.com/index.php/the-crs-program/overview>



- That the quality of all the waters of the State shall be protected,
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason, and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the state from degradation.

The Porter-Cologne Act established nine Regional Water Boards based on hydrogeologic barriers, and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. Ventura County is within the Los Angeles RWQCB area of jurisdiction.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. A number of statewide water quality control plans have been adopted by the State Water Board. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the state and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. Statewide and regional water quality control plans include enforceable prohibitions against certain types of discharges, including those that may pertain to nonpoint sources. Portions of water quality control plans, the water quality objectives and beneficial use designations, are subject to review by EPA, when approved they become water quality standards under the Clean Water Act.



Los Angeles Regional Water Quality Control Board. The Los Angeles RWQCB lays out the water quality objectives, regulations, and programs to implement the regulations in the Los Angeles Basin Plan. The Los Angeles RWQCB manages water quality based on “beneficial uses.” To protect these beneficial uses, the Los Angeles RWQCB has many regulatory programs to reduce pollutants that originate in storm water, wastewater, agricultural runoff, and recycled water.

Los Angeles RWQCB regulates discharges from many classes of municipal storm water systems through a permit program. The Ventura County Watershed Protection District, County of Ventura, and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks are named as co-permittees under a countywide municipal NPDES permit for storm water discharges issued by the Regional Water Quality Control Board. The co-permittees are required to administer, implement, and enforce a Storm Water Quality Management Program. The goal is to minimize runoff pollution typically caused by land development and protect the beneficial uses of receiving waters by limiting effective impervious area to no more than 5% of the project area and retaining storm water on site. The co-permittees require “Site Design Principles and Techniques,” “Source Control Measures,” “Retention Best Management Practices [BMPs],” “Biofiltration BMPs,” and “Treatment Control Measures” be incorporated into new development and redevelopment projects.

Wastewater from wastewater treatment or industrial activities is typically regulated through waste discharge permits (also referred to as Waste Discharge Requirements). Through this permit process the RWQCB regulates the place, volume, and specific constituents in discharges to California’s coastal waters, surface waters, and groundwater.

In 2016, the Los Angeles RWQCB readopted a Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands within the Los Angeles Region. Typically referred to as the “Conditional Waiver” program, it requires the owners of irrigated farmland to prepare and submit water quality management plans, conduct monitoring in agricultural drains and other sites influenced by agricultural runoff, and implement BMPs that address the quantity and quality of irrigation return flows and storm water runoff. The purpose is to limit these discharges, which carry nutrients, pesticides, sediment, salts, and other pollutants from cultivated fields, from reaching surface waters. The Conditional Waiver allows growers to comply as individuals or by working collectively as a “discharger group.” In response to the Conditional Waiver, the Farm Bureau of Ventura County formed the Ventura County Agricultural Irrigated Lands Group (VCAILG), which serves as a unified discharger group for those agricultural landowners and growers who agree to join. The Farm Bureau of Ventura County administers the program on behalf of VCAILG members.



Both the State Water Resources Control Board (SWRCB) and RWQCBs regulate recycled water. Permits are required to operate recycled water facilities and these permits mandate the type of treatment and resultant water quality, mandate ongoing water quality monitoring, and regulate the place and manner of recycled water use. The State Water Resources Control Board's 2009 Recycled Water Policy requires groundwater basins receiving recycled water (e.g., effluent discharge in waterways, injection, recharge, or irrigation) to be managed by Salt and Nutrient Management Plans to optimize recycled water use while ensuring the protection of groundwater supply and beneficial uses, agricultural beneficial uses, and human health. Salt and Nutrient Management Plans are submitted to the RWQCB, which incorporate the plans into the applicable Basin Plan and the RWQCB requires recycled water facilities and wastewater dischargers to operate in a manner consistent with applicable salt nutrient management plan.

The Clean Water Act also includes a regulatory mechanism called the Total Maximum Daily Load (TMDL) program. A TMDL is specific to a given impairment (chloride, nutrients) and a specific waterbody. A TMDL is a kind of "pollution budget" and includes a calculation of the maximum amount of a pollutant that can occur in a waterbody and still meet water quality standards so as to protect beneficial uses. The TMDL also allocates the necessary reductions to one or more pollutant sources.

TMDLs can force the implementation of BMPs, infrastructure improvements, and other actions to limit pollution. Within the Santa Clara River Watershed TMDLs are in place for bacteria and chloride.

California Dam Safety Act. The California Dam Safety Act (§8589.5 of the California Emergency Services Act) requires the preparation of dam inundation maps showing areas of potential flooding in the event of sudden or total dam failure as well as emergency procedures for notification and evacuation of nearby residents.

General Plan Law. *California Government Code* §65302(d) requires local general plans to include a Conservation Element that addresses water quality issues. Section 65302(g) specifies that the Safety Element must address risks associated with flooding, including the following:

- (A) Identify information regarding flood hazards, including, but not limited to, the following:
 - (i) Flood hazard zones. As used in this subdivision, "flood hazard zone" means an area subject to flooding that is delineated as either a special hazard area or an area of moderate or minimal hazard on an official flood insurance rate map issued by the Federal Emergency Management Agency (FEMA). The identification of a flood hazard zone does not imply that areas outside the



flood hazard zones or uses permitted within flood hazard zones will be free from flooding or flood damage.

- (ii) National Flood Insurance Program maps published by FEMA.
 - (iii) Information about flood hazards that is available from the United States Army Corps of Engineers.
 - (iv) Designated floodway maps that are available from the Central Valley Flood Protection Board. (not applicable outside the Central Valley)
 - (v) Dam failure inundation maps prepared pursuant to Section 8589.5 that are available from the Office of Emergency Services.
 - (vi) Awareness Floodplain Mapping Program maps and 200-year flood plain maps that are or may be available from, or accepted by, the Department of Water Resources.
 - (vii) Maps of levee protection zones.
 - (viii) Areas subject to inundation in the event of the failure of project or nonproject levees or floodwalls.
 - (ix) Historical data on flooding, including locally prepared maps of areas that are subject to flooding, areas that are vulnerable to flooding after wildfires, and sites that have been repeatedly damaged by flooding.
 - (x) Existing and planned development in flood hazard zones, including structures, roads, utilities, and essential public facilities.
 - (xi) Local, state, and federal agencies with responsibility for flood protection, including special districts and local offices of emergency services.
- (B) Establish a set of comprehensive goals, policies, and objectives based on the information identified pursuant to subparagraph (A), for the protection of the community from the unreasonable risks of flooding, including, but not limited to:
- (i) Avoiding or minimizing the risks of flooding to new development.
 - (ii) Evaluating whether new development should be located in flood hazard zones, and identifying construction methods or other methods to minimize damage if new development is located in flood hazard zones.
 - (iii) Maintaining the structural and operational integrity of essential public facilities during flooding.
 - (iv) Locating, when feasible, new essential public facilities outside of flood hazard zones, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities or identifying construction methods or other methods to minimize damage if these facilities are located in flood hazard zones.
 - (v) Establishing cooperative working relationships among public agencies with responsibility for flood protection.



- (C) Establish a set of feasible implementation measures designed to carry out the goals, policies, and objectives established pursuant to subparagraph (B).

In 2015 the state legislature adopted SB 379, which requires the Safety Element to include climate adaptation and resiliency strategies based upon a vulnerability assessment that identifies the risks that climate change poses to the local jurisdiction.

Local

Santa Clara River Enhancement and Management Plan. The Santa Clara River Enhancement and Management Plan (SCREMP) was jointly published in 2005 by the Ventura County Watershed Protection District and the Los Angeles County Department of Public Works. The City of Santa Paula was a member of the Steering Committee for this project. The stated purpose of the SCREMP was “to provide a guidance document for the preservation, enhancement, and sustainability of the physical, biological, and economic resources that occur within the 500-year floodplain limits of the Santa Clara River mainstem that will be of benefit to Stakeholders when planning and implementing projects and activities.” The SCREMP is not a regulatory document, but provides recommended policies and programs regarding water quality, water supply, groundwater, flood control, biological habitat conservation, recreation, aggregate resources (sand and gravel), and cultural resources.

Ventura County Watershed Protection District. Several watercourses within the Planning Area are under the jurisdictional authority of the Ventura County Watershed Protection District (VCWPD). These jurisdictional redline channels include Santa Clara River, Todd Barranca, Cummings Road Drain, Briggs Road Drain, Haines Barranca, Adams Barranca, Saltmarsh Canyon, Sisar Creek, Camp Bartlett Creek, Peck Road Drain, Fagan Canyon, Santa Paula Creek, Magnolia Drive Creek, Mud Creek Canyon, Anlauf Canyon, Orcutt Canyon, Timber Canyon, O’Leary Creek, and Balcom Canyon Wash.

In accordance with Ventura County Watershed Protection District Ordinance WP-2 enacted October 13, 2013, it is VCWPD’s standard that a project can not impair, divert, impede or alter the characteristics of the flow of water running in any jurisdictional redline channel or facility. To the extent that development impacts VCWPD channels and facilities, compliance with District criteria is required. In such cases engineering studies should verify compliance with District hydrology data and flood studies. In addressing peak attenuation, stormwater runoff after development must not exceed the peak flow under existing conditions for any frequency of event; any additional flow (peak, volume) must be contained on the development site.



Furthermore, any development activity including drainage connections and site grading that is proposed in, on, under, or across any jurisdictional redline channel or facility including the bed, banks, and overflow areas will require a permit from the Watershed Protection District.

Santa Paula Municipal Code. Title V, Chapter 54 (Stormwater Quality Management) establishes standards and procedures to prohibit non-storm water discharges into the storm drain system, flood control channels, and debris and detention basins, and to reduce the discharge of pollutants in storm water to the maximum extent practicable in conformance with the Clean Water Act and State law.

The Municipal Code also includes land use and building regulations that mitigate potential impacts related to flooding and mudslide hazards. These include Title XV, Chapter 151 (Flood Damage Prevention), subdivision regulations (Title XVI, Chapter 16.80), grading regulations (Title XVI, Chapters 16.96, 16.97 and 16.98), and building codes (Title XV, Chapter 150).

Municipal Code Section 52.055 et seq. (Groundwater Conservation) establishes regulations for the construction, maintenance, operation, use, repair, modification, and destruction of water wells within the city in such a manner that the groundwater of the county will not be contaminated.

4.10-2 Thresholds of Significance

In accordance with Appendix G to the CEQA Guidelines, the proposed General Plan would have a significant impact on hydrology and water quality if it would cause any of the following conditions to occur:

- a.) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. (Impact HYD-1)
- b.) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. (Impact HYD-2)
- c.) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:
 - i) result in a substantial erosion or siltation on- or off-site;
 - ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;



- iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- iv) impede or redirect flood flows? (Impact HYD-3)
- d.) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (Impact HYD-4)
- e.) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (Impact HYD-1, HYD-2)

4.10-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to hydrology and water quality expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact HYD-1: Violate water quality standards or waste discharge requirements, substantially degrade surface or groundwater quality, or conflict with a water quality control plan

Impact Discussion

Project Impacts. The proposed General Plan would facilitate additional development that could increase impervious surfaces and the amount of runoff and associated pollutants during both construction and long-term. However, as described in the Regulatory Setting section above, all construction activities are required to comply with Federal, State and County regulations such as the NPDES Stormwater Discharge Permit and Ventura County Watershed Protection District regulations. These regulations reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater, thereby reducing the amount of water-borne pollutants that enter the storm drain system.

The proposed General Plan policies and programs pertaining to water quality listed in **Table 4.10-1** would help to prevent water pollution, ensure implementation of applicable water quality plans, require incorporation of BMPs, and ensure compliance with applicable regulations. Implementation of these policies and programs would substantially reduce impacts to a level that is less than significant.



Table 4.10-1 General Plan Policies and Programs Related to Water Quality Standards

Policies	Programs
<p>ECR 7.1. Minimize impacts from existing uses and development activities on surface waters and aquifer recharge areas. Enhance water quality in stream channels and aquifer recharge areas by reducing existing sources of water pollution and minimizing water pollutants from new development. Seek funding sources for programs to improve storm water quality.</p> <p>ECR 7.2. Regional partnerships. Continue partnerships with other agencies such as the Ventura County Watershed Protection District to improve water quality.</p>	<p>ECR 7.a. Existing regulations. Review and update City procedures and regulations annually to ensure compliance with current federal and State water quality laws.</p> <p>ECR 7.b. Development review. As part of the review process for private developments and public works projects, ensure compliance with all applicable water quality regulations and require mitigation measures where necessary to minimize impacts to water quality.</p> <p>ECR 7.c. Multi-purpose open space. Design new parks and open spaces to serve multiple purposes, including storm water retention and aquifer recharge.</p> <p>ECR 7.d. Santa Clara River Enhancement and Management Plan. Support the Santa Clara River Enhancement and Management Plan and facilitate its implementation in Santa Paula.</p> <p>ECR 7.e. Storm drain maintenance and pollution prevention.</p> <ul style="list-style-type: none"> - Ensure that streets, parking lots, parks, and other public areas are routinely cleaned of litter, debris, and contaminant residue. - Coordinate with and support efforts by other organizations or volunteer groups to promote cleanups of parks and public open spaces. Where streets and other common facilities are privately-owned, require property owners or homeowners' associations, as applicable, to remove debris and contaminated residue on a regular basis. - Install and maintain storm drain filtration units for surface water runoff in areas where trash accumulates, such as large parking lots and busy streets. - Ensure that City landscape maintenance operations minimize the release of pesticides, fertilizers and other contaminants into storm drains. - Enforce regulations regarding storm drain discharges such as vehicle and equipment wash water, and swimming pools. <p>ECR 7.f. Spill response and enforcement. Develop and implement a Spill Response Plan with procedures for cleanup of accidental spills and illicit discharges into the storm drain system and pursue enforcement actions as necessary.</p> <p>ECR 7.g. Public information. Provide information to residents and local businesses about the importance of storm water pollution prevention.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to water quality standards and waste discharge requirements would be less than significant.¹⁰⁷ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to *CEQA Guidelines* Sec 15130(d).

¹⁰⁷ SCAG 2016-2040 RTP/SCS PEIR, p. 3.10-61



Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

Impact HYD-2: Groundwater supplies, recharge and groundwater basin management

Impact Discussion

Project Impacts. Santa Paula currently obtains all of its domestic water supply from groundwater. The proposed General Plan would facilitate additional development within the Planning Area that could increase water demand. However, the proposed General Plan policies and programs listed in **Table 4.10-2** below, along with water conservation policies and programs discussed in **Section 4.18 - Utilities**, would help to conserve groundwater in the Planning Area. In addition, the proposed General Plan policies and programs described under Impact HYD-1, above would help to minimize impermeable surfaces in new development thereby capturing more rainfall through percolation into the ground. Furthermore, the City's groundwater conservation regulations (SPMC §52.055, et seq.) described in the Regulatory Framework above, help to protect groundwater from potential sources of contamination resulting from well drilling. These policies, programs and existing regulations would substantially reduce potential impacts related to groundwater to a level that is less than significant.

Table 4.10-2 General Plan Policies and Programs Related To Groundwater

Policies	Programs
<p>PSU 6.1. Ensure adequate water supply and wastewater treatment capacity. Ensure that adequate water supply and wastewater treatment capacity will be available to support Santa Paula's current and future needs through conservation, wise groundwater management, protection of aquifer recharge areas, and upgrading and expansion of the water distribution and wastewater treatment systems. Require new development to contribute its fair share to the cost of providing the additional water and wastewater treatment capacity required to serve the development.</p>	<p>PSU 6.a. Water and Wastewater Plans. Prepare and regularly update an Urban Water Management Plan and a Wastewater Master Plan identifying the city's water needs, water sources, water and wastewater infrastructure requirements and funding mechanisms to ensure that adequate, safe water supplies and wastewater treatment capacity will be available to serve existing and future development. When new or upgraded facilities are necessary, ensure that they are incorporated into the City's Capital Improvement Program.</p> <p>PSU 6.b. Development review. As part of the review process for new developments, assist applicants in demonstrating compliance with all policies and standards related to water supply and wastewater treatment.</p> <p>PSU 6.c. Water conservation. Encourage water conservation through compliance with building and landscaping codes, use of reclaimed water, and public information.</p>



Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to groundwater supplies.¹⁰⁸ However, the proposed policies and programs together with existing regulations would substantially reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

Impact HYD-3: Alteration of drainage patterns resulting in erosion, siltation, flooding, or water pollution

Impact Discussion

Project Impacts. Future development anticipated under the proposed 2040 General Plan could alter drainage patterns and contribute to erosion and siltation through ground disturbance during grading and construction. In addition, new development could result in an increase in runoff due to the creation of additional impervious surfaces such as buildings, streets, parking lots and other hard surfaces. Higher runoff volumes could lead to increased erosion in waterways. In addition, new development could result in an increase in pollutants such as pesticides, fertilizers, oil, heavy metals and pet waste into storm drains.

As noted in the Regulatory Setting above, all development must comply with existing regulations such as Best Management Practices (BMPs) required under the National Pollutant Discharge Elimination System (NPDES), which are enforced by the Los Angeles RWQCB and the Ventura County Watershed Protection District. In addition, Santa Paula Municipal Code Title V, Chapter 54 (Stormwater Quality Management) establishes standards and procedures to prohibit non-storm water discharges into the storm drain system, flood control channels, and debris and detention basins, and to reduce the discharge of pollutants in storm water to the maximum extent practicable in conformance with the Clean Water Act and State law.

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The proposed 2040 General Plan policies and programs listed in **Table 4.10-3** below, together with required compliance with existing water quality regulations, would substantially reduce potential impacts to a level that is less than significant.

Table 4.10-3 General Plan Policies and Programs Related to Erosion, Siltation And Surface Water Quality

Policies	Programs
<p>ECR 7.1. Minimize impacts from existing uses and development activities on surface waters and aquifer recharge areas. Enhance water quality in stream channels and aquifer recharge areas by reducing existing sources of water pollution and minimizing water pollutants from new development. Seek funding sources for programs to improve storm water quality.</p> <p>ECR 7.2. Regional partnerships. Continue partnerships with other agencies such as the Ventura County Watershed Protection District to improve water quality.</p>	<p>ECR 7.a. Existing regulations. Review and update City procedures and regulations annually to ensure compliance with current federal and State water quality laws.</p> <p>ECR 7.b. Development review. As part of the review process for private developments and public works projects, ensure compliance with all applicable water quality regulations and require mitigation measures where necessary to minimize impacts to water quality.</p> <p>ECR 7.c. Multi-purpose open space. Design new parks and open spaces to serve multiple purposes, including storm water retention and aquifer recharge.</p> <p>ECR 7.d. Santa Clara River Enhancement and Management Plan. Support the Santa Clara River Enhancement and Management Plan and facilitate its implementation in Santa Paula.</p> <p>ECR 7.e. Storm drain maintenance and pollution prevention.</p> <ul style="list-style-type: none"> - Ensure that streets, parking lots, parks, and other public areas are routinely cleaned of litter, debris, and contaminant residue. - Coordinate with and support efforts by other organizations or volunteer groups to promote cleanups of parks and public open spaces. Where streets and other common facilities are privately-owned, require property owners or homeowners' associations, as applicable, to remove debris and contaminated residue on a regular basis. - Install and maintain storm drain filtration units for surface water runoff in areas where trash accumulates, such as large parking lots and busy streets. - Ensure that City landscape maintenance operations minimize the release of pesticides, fertilizers and other contaminants into storm drains. - Enforce regulations regarding storm drain discharges such as vehicle and equipment wash water, and swimming pools. <p>ECR 7.f. Spill response and enforcement. Develop and implement a Spill Response Plan with procedures for cleanup of accidental spills and illicit discharges into the storm drain system and pursue enforcement actions as necessary.</p> <p>ECR 7.g. Public information. Provide information to residents and local businesses about the importance of storm water pollution prevention.</p>



Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to erosion or siltation would be less than significant.¹⁰⁹ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to *CEQA Guidelines* §15130(d).

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

Impact HYD-4: Risk release of pollutants due to inundation in flood hazard, tsunami or seiche zones

Impact Discussion

Project Impacts. As noted in the Existing Physical Conditions section above, portions of the Santa Paula Area of Influence are located within designated stormwater flood hazard zones and potential dam failure inundation areas. There are no large lakes or reservoirs in or near Santa Paula and the city is located approximately 15 miles inland from the Pacific Ocean; therefore, the risk of flooding to due to seiche or tsunami is less than significant.

Stormwater Flood Hazards

If stormwater were to exceed the capacity of natural or man-made drainage channels, flooding could convey pollutants downstream. During extreme flood events, such pollutants could include untreated wastewater or hazardous materials used in commercial or industrial operations. The proposed General Plan anticipates additional development that would generate increased wastewater flows as well as potentially hazardous materials used or stored by businesses, which could exacerbate the risk of pollutant releases during flooding.

The Ventura County Watershed Protection District (VCWPD) has authority over major drainage courses and flood control channels (**Exhibit 4.10-1**) while the City of Santa Paula is responsible for the network of storm drains that conveys surface water from urban areas to the major channels. The City's Storm Drain Master Plan evaluates

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existing drainage systems and identifies proposed facilities needed to address deficiencies (**Exhibit 4.10-3**).

As noted in the Regulatory Setting discussion above, all development must comply with existing regulations intended to reduce flood hazards. For example, VCWPD regulations require new development to be designed such that stormwater runoff after development does not exceed the peak flow under existing conditions for any frequency of event, and any additional flow must be contained within the development site. In addition, FEMA regulations and the National Flood Insurance Program (NFIP) help to reduce the potential for flood damage by avoiding development in flood-prone areas. The City is a participating community in the NFIP.

The City's Municipal Code also includes land use and building regulations that mitigate potential impacts related to flood hazards. These regulations include Title XV, Chapter 151 (Flood Damage Prevention), Title XVI, Chapter 16.80 (subdivision regulations), Title XVI, Chapters 16.96, 16.97 and 16.98 (grading regulations), and Title XV, Chapter 150 (building codes).

For the Santa Clara River, the primary risk management strategy is to restrict land uses within the flood plain to agriculture, open space, or other uses that would experience minimal damage during a major flood event. A supporting strategy is to maintain the levee system to constrain the northern extent of a major flood event. While flooding in the Santa Clara River could be destructive, severe damage or extensive loss of life is not anticipated from a 100-year storm event.

The proposed General Plan policies and programs listed in **Table 4.10-4** below, together with required compliance with Federal, State, County and City regulations, would substantially reduce potential impacts related to pollution from stormwater to a level that is less than significant.

Table 4.10-4 General Plan Policies and Programs Related to Stormwater Flood Hazards

Policies	Programs
HPS 2.1. Flood hazard mitigation planning. Minimize risks from flood hazards, including storm water and dam failure, by locating development where such risks can be mitigated to an acceptable level. When feasible, locate new essential public facilities, including hospitals and health care facilities, emergency shelters, police and fire stations, emergency command centers, and emergency communications facilities, outside of flood hazard zones. Require new development to comply with all applicable regulations related to flood hazard mitigation. New developments in Expansion Areas should reduce existing flood hazards where feasible. If flood risks cannot be feasibly mitigated to an acceptable level, development shall not be approved.	<p>HPS 2.a. Update regulations. Review flood hazard maps and data annually and ensure that the most recent regulations and sources of information are used in reviewing development proposals.</p> <p>HPS 2.b. Master Plan of Storm Drains. Prepare and regularly update the Master Plan of Storm Drains for Santa Paula.</p> <p>HPS 2.c. Capital Improvement Program. Prepare and regularly update the Capital Improvement Program, including the schedule for planned flood control improvements and funding sources.</p>



Policies	Programs
<p>HPS 2.2. National Flood Insurance Program. Participate in the NFIP and the Community Rating System to ensure that the City is incentivized to reduce the risk of damage from flooding and improve flood preparedness.</p> <p>HPS 2.3. Flood control improvements. Support flood control projects on the Santa Clara River, Santa Paula Creek, and other waterways to eliminate or reduce flood hazards in areas of existing and proposed development. Ensure that flood control improvements are designed in a manner that maintains streams and barrancas in as natural a condition as possible and utilize colors, materials, and other design features that blend into the surrounding environment.</p> <p>HPS 2.4. Inter-agency cooperation. Continue to work cooperatively with the Army Corps of Engineers, Ventura County Watershed Protection District (VCWPD), and other agencies to reduce flood hazards in Santa Paula. In accordance with VCWPD Ordinance WP-2 enacted October 13, 2013, a project shall not impair, divert, impede or alter the characteristics of the flow of water running in any jurisdictional redline channel or facility. To the extent that development impacts VCWPD channels and facilities, compliance with VCWPD criteria is required. In such cases engineering studies should verify compliance with VCWPD hydrology data and flood studies.</p> <p>HPS 2.5. Emergency response. Ensure that the City's Emergency Response Plan includes timely public notification of predicted flood events and methods to ensure structural and operational integrity of essential public facilities and evacuation protocols during flood events.</p> <p>HPS 2.6. Limit peak discharge. Require new development to be designed such that storm water runoff after development does not exceed the peak flow under existing conditions for any frequency of event; any additional flow (peak, volume) must be contained on the development site. Furthermore, any development activity including drainage connections and site grading that is proposed in, on, under, or across any VCWPD jurisdictional redline channel or facility including the bed, banks, and overflow areas will require a permit from VCWPD.</p>	<p>HPS 2.d. Development review. As part of the development review process, assist applicants in demonstrating conformance with all applicable drainage and flood control regulations, including but not limited to VCWPD Ordinance WP-2, and identify appropriate mitigation measures. Any development activity including drainage connections and site grading that is proposed in, on, under, or across any VCWPD jurisdictional redline channel or facility including the bed, banks, and overflow areas must demonstrate that all required permits have been obtained from VCWPD.</p> <p>HPS 2.e. National Flood Insurance Program. Continue to participate in the National Flood Insurance Program and consider participation in the Community Rating System Program.</p> <p>HPS 2.f. Disaster recovery. Review the City's Emergency Response Plan to ensure that evacuation routes will be usable during major flood events.</p>

Inundation due to Dam or Levee Failure

Dam failure can result from a variety of natural or human-caused events. Factors contributing to dam failure may include design deficiencies, improper construction, inadequate maintenance, weakening of the dam through the normal aging process, or seismic activity. There is no record of a dam failure in Ventura County; however, the 1928 collapse of St. Francis Dam in Los Angeles County caused major flooding in Santa Paula and other portions of the Santa Clara Valley.



FEMA characterizes a dam as a high hazard if it stores more than 1,000 acre-feet of water, is taller than 150 feet, and has the potential to cause downstream property damage. Four dams northeast of Santa Paula have the potential to result in significant inundation in the city or surrounding area: Lake Pyramid Dam, Lake Castaic Dam, Bouquet Canyon Dam, and Santa Felicia Dam (Lake Piru). As discussed above in the Existing Physical Conditions section the southerly portion of Santa Paula is within a potential dam failure inundation area (**Exhibit 4.10-4**). According to the 2015 Ventura County Multi-Hazard Mitigation Plan¹¹⁰ 5,801 housing units (81%) and 18 critical facilities in Santa Paula are within this dam failure inundation area.

The Division of Safety of Dams (DSOD) regulates state-size dams and inspects them annually to ensure that they are in good operating condition. Also, as required by DSOD regulations, the flood inundation limits resulting from a dam breach during the design storm (probable maximum precipitation) are established for each state-size dam. The resultant maps contain flood-wave arrival time estimates and flood inundation areas. These maps are maintained by the California Governor's Office of Emergency Services (Cal OES) and provided to DSOD and local communities.

The Santa Clara River Enhancement and Management Plan estimated that approximately 597 acres of land in Santa Paula lies within the 500-year floodplain of the Santa Clara River.¹¹¹ Flood protection facilities constructed in the past along the Santa Clara River include: 1) rock groins at Haines Barranca in 1969; rock groins at Fagan Canyon in 1979; three rock groins along the north bank of Santa Clara River at the Santa Paula Airport in 1970; and two rock groins on the south bank of the river upstream of Willard Canyon in 1970. These protection facilities are owned and maintained by VCWPD. In addition, numerous privately-owned flood protection facilities have been constructed and are maintained by individual landowners.¹¹²

The proposed 2040 General Plan policies and programs listed in **Table 4.10-4** above together with the ongoing State regulation and inspection of dams upstream of Santa Paula reduces the potential impact of pollution resulting from dam or levee failure to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to stormwater runoff and flooding.¹¹³ However, the proposed policies and programs together with existing regulations would substantially

110 <http://www.venturacountymhmp.com/documents>, Appendix N, p. N-3

111 VCWPD and LA County DPR, Santa Clara River Enhancement and Management Plan, Table 5.1-1, 2005

112 City of Santa Paula, Santa Paula General Plan EIR, p. 4.7-4, 1998

113 SCAG 2016-2040 RTP/SCS PEIR, p. 3.10-62 and 3.18-42



reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required.

Level of Significance after Mitigation

Less than significant

4. Environmental Setting and Impact Analysis
4.10 – Hydrology and Water Quality



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4.11 Land Use and Planning

4.11-1 Setting

Existing Physical Conditions

Santa Paula encompasses approximately 4.9 square miles within the current City boundary. Surrounded by the agricultural and natural resources of the Santa Clara River Valley, the city has a distinct small-town character and economy supported by a traditional land use pattern. The city has a well-preserved historic downtown and small-block street grid pattern conducive to walking and biking.

The distribution of existing land uses in Santa Paula is summarized in **Table 4.11-1** and **Exhibit 4.11-1** and is illustrated in **Exhibit 4.11-2**. Residential development is the largest category of existing land use, encompassing about 37% of the city. Of the residentially developed land, 83% is comprised of single-family homes. Commercial uses comprise approximately 7% of the city's area, while industrial uses occupy about 6% of the total. Nearly 24% of land is in agriculture, and about 11% consists of parks/recreational land, public facilities, and infrastructure. About 13% of land in the city is vacant (other than agriculture and parkland).

Regulatory Framework

Many County, Regional, State, and Federal plans, policies and regulations adopted for the purpose of reducing environmental impacts are discussed in other sections of this EIR and are not addressed here. Such topics include air quality (**Section 4.4**), biological resources (**Section 4.5**), cultural resources (**Section 4.6**), geologic hazards (**Section 4.7**), hazards and hazardous materials, including aviation and wildfires (**Section 4.9**), hydrology and water quality (**Section 4.10**), noise (**Section 4.12**), transportation, including the SCAG Regional Transportation Plan/Sustainable Communities Strategy, the Ventura County Comprehensive Transportation Plan and other plans adopted by VCTC (**Section 4.17**), and utilities, including water, wastewater and solid waste (**Section 4.18**).

Other land use plans, policies and regulations that are relevant to this analysis include SOAR, Santa Paula Measure L6, Ventura Local Agency Formation Commission (LAFCo) policies, and two greenbelt agreements.

4. Environmental Setting and Impact Analysis
4.11 – Land Use and Planning



Table 4.11-1 Existing Land Use Acreage in Santa Paula

Land Use	Acreage	Percentage of City
Residential		
Single-Family	955	30.7%
Multi-Family	89	2.9%
Mobile Homes	101	3.2%
Subtotal Residential:	1,145	36.8%
Commercial		
General commercial	75	2.4%
Retail commercial	134	4.3%
Hotel/motel	3	0.1%
Subtotal Commercial:	212	6.8%
Industrial		
General Industrial and manufacturing	185	5.9%
Wholesale and warehouse	4	0.1%
Subtotal Industrial:	190	6.1%
Parks and Recreation (public and private)	33	1.0%
Agriculture	738	23.7%
Public Facilities and Infrastructure	319	10.3%
Vacant (other than agriculture, parks, recreation and other public facilities)	406	13.0%
Other/undetermined	56	1.8%
Totals:	3,114	100%

Source: SCAG, 2015

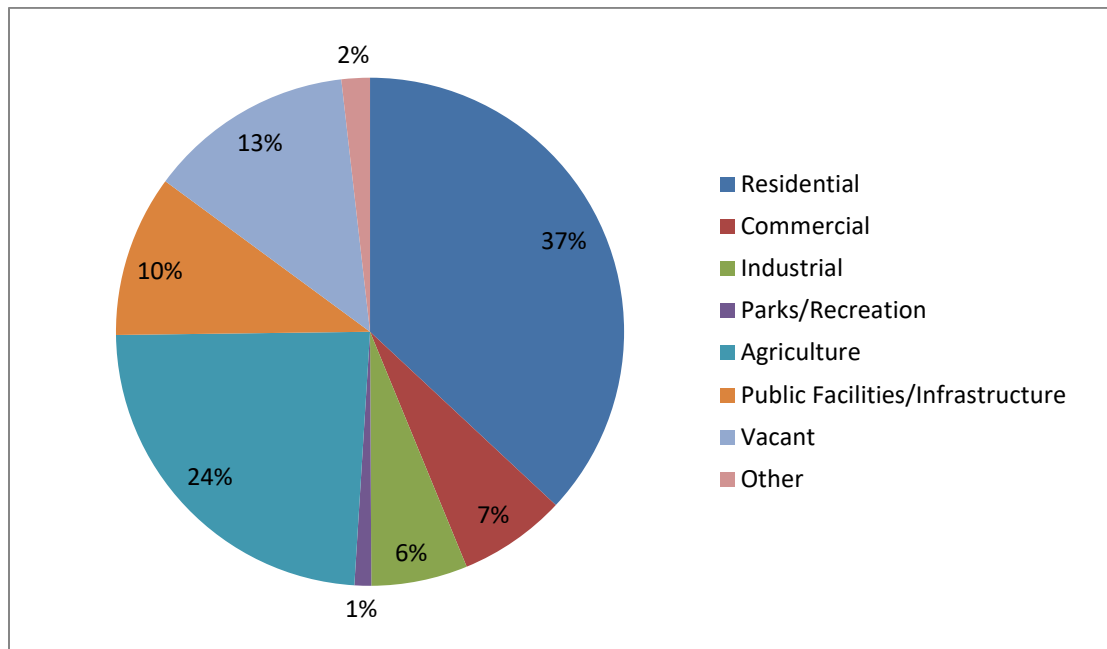


Exhibit 4.11-1 Existing Land Use Distribution

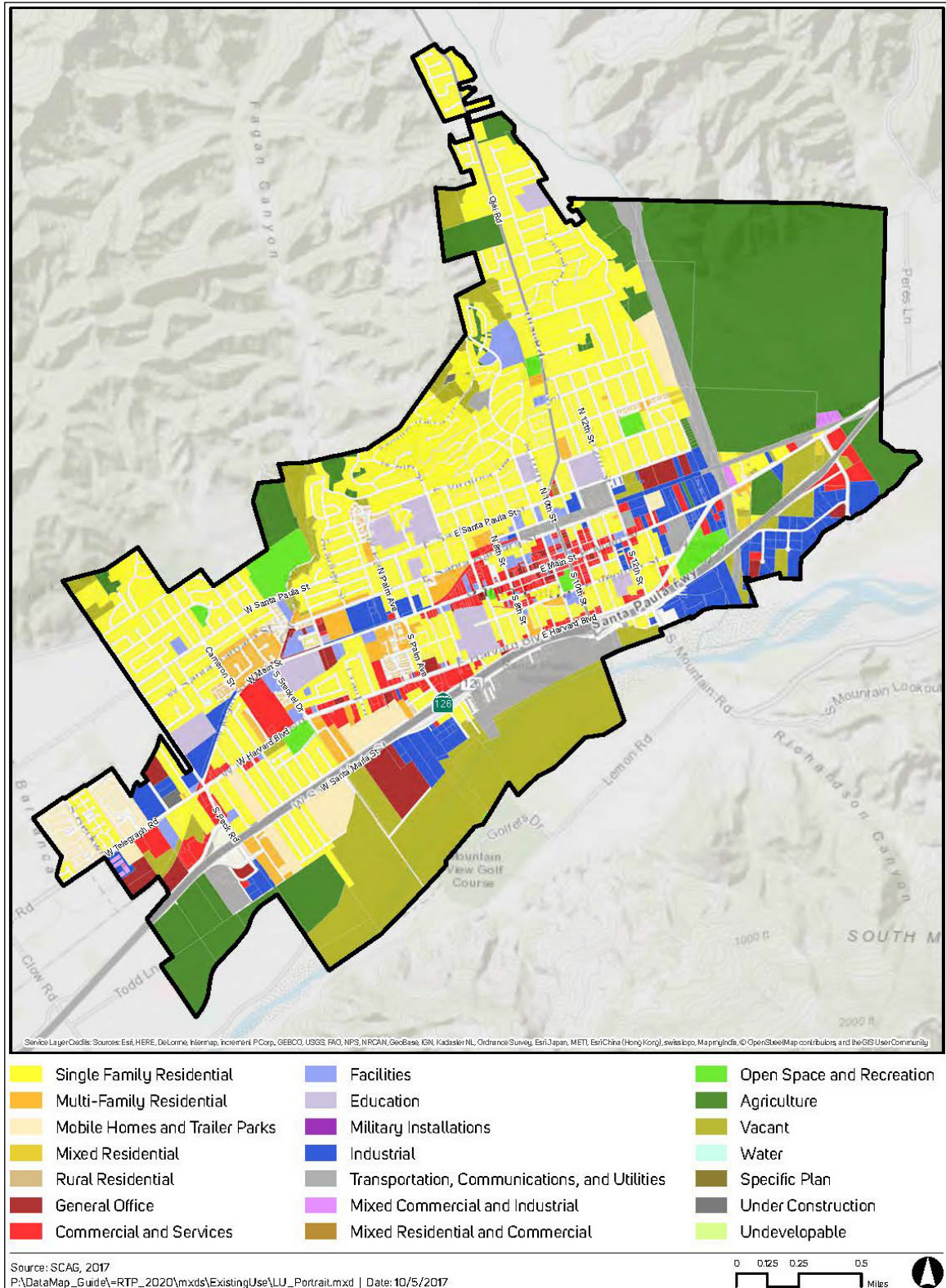


Exhibit 4.11-2 Existing Land Use



Save Open Space and Agricultural Resources (SOAR)

SOAR is a voter-approved initiative that requires a vote of the people before agricultural land or open space areas can be developed. In 1995, the City of Ventura approved the first SOAR initiative. Since then, SOAR initiatives have been approved in eight of the ten cities in Ventura County and in county unincorporated areas. The SOAR ordinances require approval of the voters before allowing urban development beyond a City Urban Restriction Boundary (CURB) line.

In Santa Paula, the voters passed SOAR/ Measure “I” in 2000, thereby amending the General Plan to include a CURB. The SOAR ordinance is reflected in the City’s current General Plan Land Use Element.

Since initial adoption of the CURB line, Santa Paula voters have approved several initiative amendments. In November 2016, Santa Paula’s CURB provisions were extended to December 31, 2050. The ordinance also made minor textual changes to the CURB as follows:

1. The ordinance expands the CURB boundary to include 53.75 acres in the southwest portion of the city. The ordinance otherwise re-establishes the CURB boundary in its current location.
2. Previous CURB provisions allowed the City Council to amend the CURB without voter approval provided that no more than 10 acres of land per calendar year were added and the land proposed for inclusion within the amended CURB had not been used for agricultural purposes in the immediately preceding 2 years. The 2016 ordinance increased the time that the area has not been used for agricultural purposes from 2 to 4 years.
3. The 2016 ordinance deleted as uses for which the City Council can amend the CURB without seeking voter approval land contemplated for construction of “public schools” and “other government facilities.”

A full copy of the current SOAR ordinance is provided as Appendix A of the 2040 Land Use Element.

Measure L6

Adopted in 2006, the Citizens Advocating Responsible Expansion Initiative (aka the “81-Acre Initiative”) generally requires voter approval for large-scale developments proposed on 81 or more acres of property. In 2008, the City Council adopted Ordinance No. 1188, which added Chapter 16.237 to the Santa Paula Municipal Code (SPMC) to implement the 81-Acre Initiative. As noted in SPMC §16.237, developments that amend the Land Use Element of the General Plan to increase the density or land intensity on property located within the City’s



planning areas, which includes its Sphere of Influence, generally require voter approval. Other than the voter-approved East Area 1 project, no projects have been submitted that would trigger Ordinance No. 1188. Measure L6 was originally effective until 2025; however, the SOAR measure approved by voters in November 2016 also included an extension of Measure L6 to December 31, 2050. Other than extension of its expiration date, the 2016 SOAR made no substantive changes to the provisions of this measure. The full text of Measure L6 is part of the SOAR measure included in Appendix A of the 2040 Land Use Element.

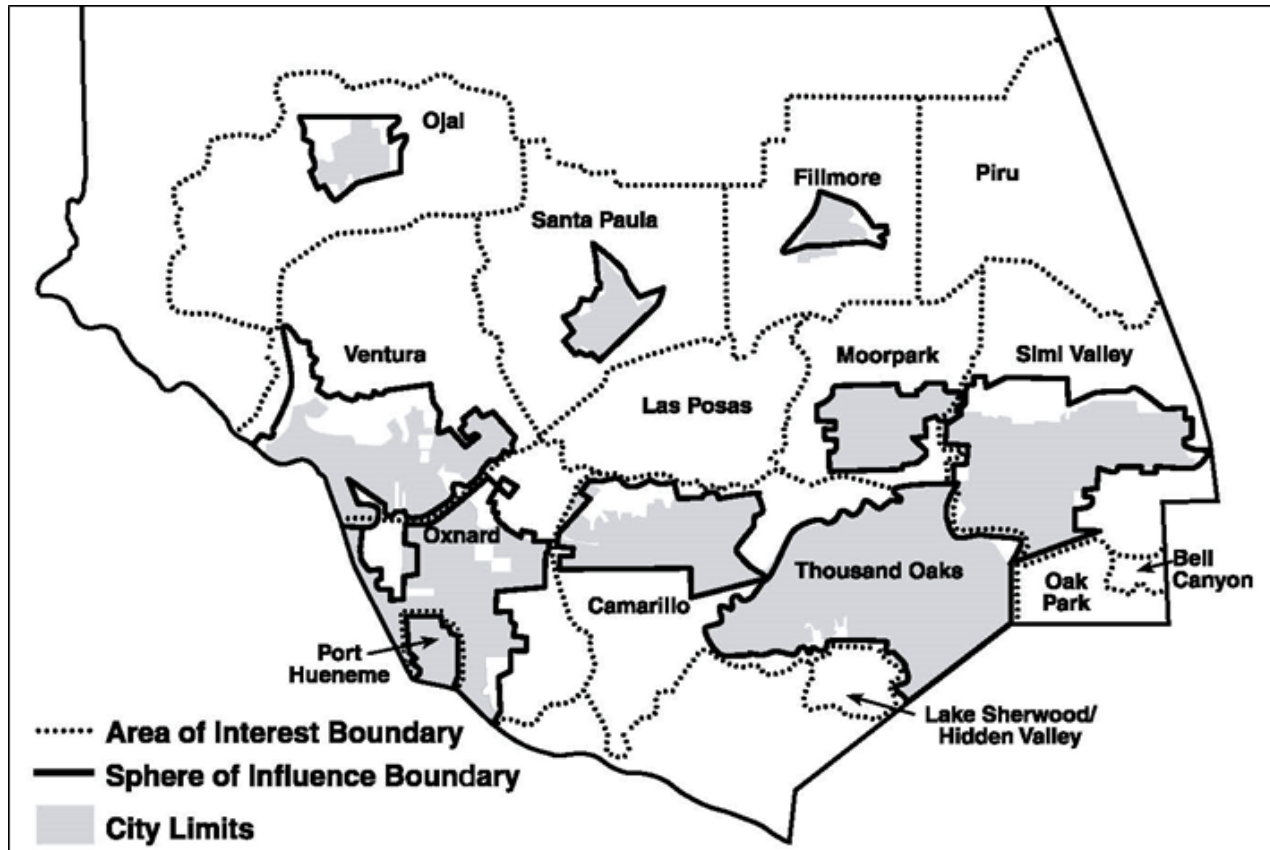
Ventura LAFCo

The Cortese-Knox-Hertzberg (C-K-H) Local Government Reorganization Act (*California Government Code* §56000, et seq.) establishes procedures for local agency changes of organization, including city incorporation, annexation to a city or special district, and consolidation of cities or special districts. Each county has an independent Local Agency Formation Commission (LAFCo) with authority to administer this law. While LAFCo does not have direct land use authority, state law assigns LAFCo a significant role in planning issues by requiring it to consider land use and growth factors when it reviews proposed boundary changes. LAFCo's boundary decisions affect access to public facilities and services needed to support development.

The following LAFCo policies affect land use planning and development in Santa Paula.

Areas of Interest. Ventura LAFCo has established “areas of interest” that divide the south half of Ventura County (the non-Forest Service land) into 15 major geographic planning areas based primarily on topography and community identity (**Exhibit 4.11-3**). These areas of interest serve as planning referral lines between the County and cities for discretionary land use entitlements. Areas of interest have been reviewed and updated periodically in conjunction with the Guidelines for Orderly Development.¹¹⁴

114 <http://www.ventura.lafco.ca.gov/wp-content/blogs.dir/3/files/2012/01/2005-GuidelineOD-1.pdf>



Source: Ventura LAFCo, Guidelines for Orderly Development, 1996

Exhibit 4.11-3 LAFCo Areas of Interest



Sphere of Influence. A sphere of influence (SOI) represents “the probable physical boundaries and service area of a local agency, as determined by the Commission.” (*Government Code* §56076) LAFCo is responsible for establishing a SOI for each city and district whose boundaries it regulates. Typically, a SOI is the territory a city or district is expected to annex. The Ventura LAFCo has adopted a policy that prime agricultural or existing open space land will only be included within a SOI if the territory is likely to be developed within 5 years.¹¹⁵ Cities and districts cannot provide services outside their SOI except in very limited circumstances.

The current SOI for the City of Santa Paula was adopted by LAFCo on February 21, 2018 in connection with the Municipal Service Review. The Santa Paula SOI is shown in **Exhibit 4.11-4** and also in the Land Use Plan Map (**Exhibit 3.4-1** on page [3-6](#)). The most notable change as part of LAFCo’s action was the removal of Adams Canyon and Fagan Canyon from the Santa Paula SOI.

Greenbelt Agreements

Greenbelts are voluntary agreements between the County and one or more cities to limit urban development in agricultural and/or open space areas within the unincorporated county. Greenbelts protect open space and agricultural lands and prevent premature conversion to uses incompatible with agriculture. Through greenbelt agreements, cities commit to not annex any property within a greenbelt while the County agrees to restrict development to uses consistent with existing zoning.

LAFCo will not approve any proposal from a city or the County that is in conflict with a greenbelt agreement unless exceptional circumstances are shown to exist.¹¹⁶ Two greenbelt agreements have been approved between the City of Santa Paula and Ventura County as summarized below.

¹¹⁵ Ventura LAFCo, *Commissioner’s Handbook*, Sec. 4.3.2.1.a, 2016

¹¹⁶ <http://www.ventura.lafco.ca.gov/wp-content/uploads/Ventura-LAFCo-Commissioners-Handbook-Revised-4.20.2016.pdf> (Sec. 3.2.4.4)

4. Environmental Setting and Impact Analysis
4.11 – Land Use and Planning

City of Santa Paula
2040 General Plan Update
Draft Program EIR

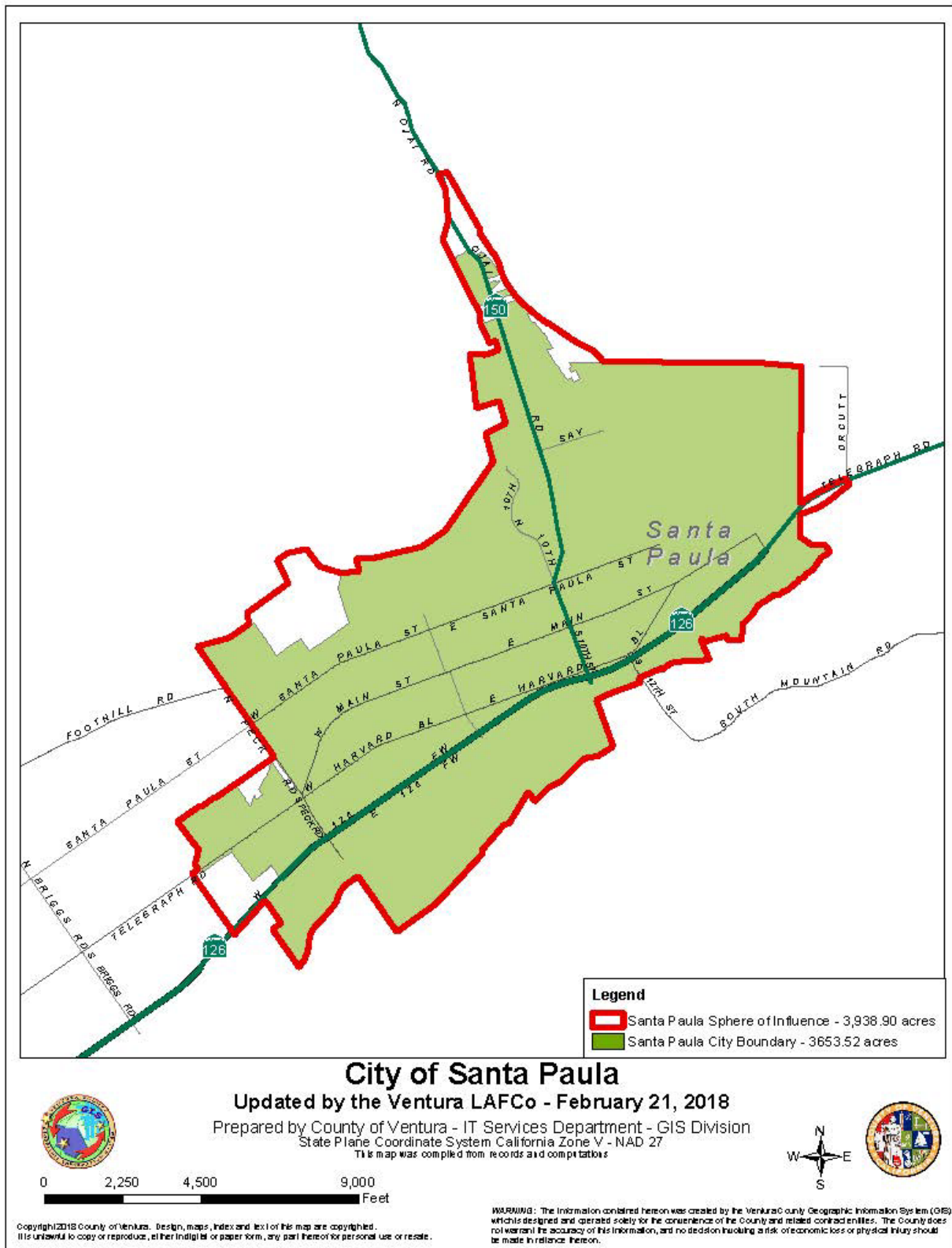


Exhibit 4.11-4 Santa Paula Spheres of Influence



Ventura-Santa Paula Greenbelt. The cities of Ventura and Santa Paula and Ventura County adopted the Ventura-Santa Paula Greenbelt in 1967. This greenbelt covers 27,884 acres and is bounded on the north by the Ventura and Santa Paula Areas of Interest boundaries, on the east by the Santa Paula Sphere of Influence and parcel lines, on the south by the Ventura and Santa Paula Areas of Interest boundaries, and on the west by the Ventura Sphere of Influence boundary, the eastern boundary of the Hillside Voter Participation Area, and parcel lines (**Exhibit 4.11-5**).

Santa Paula-Fillmore Greenbelt. The Santa Paula and Fillmore Greenbelt Agreement was first established in 1980. This agreement covers over 32,000 acres between Santa Paula and Fillmore and is the largest greenbelt in Ventura County. The southern boundary is the South Mountain ridgeline and Oak Ridge. The northern boundary lies at the Los Padres National Forest boundary. In 2010 an amended Greenbelt Agreement was adopted by Ventura County (County Ordinance 4415) and the cities of Santa Paula and Fillmore to reflect the annexation of East Area 1. In 2018 a subsequent amendment to this Greenbelt Agreement (Santa Paula Ordinance 1275) was adopted to reflect the passage of the SOAR extension approved by voters in 2016 and the removal of 9 parcels totaling approximately 129 acres owned by Thomas Aquinas College from the Greenbelt (**Exhibit 4.11-6**).

4.11-2 Thresholds of Significance

Appendix G of the CEQA Guidelines recognizes the following significance thresholds related to land use and planning. Based on these thresholds, potential impacts could be considered significant if the 2040 General Plan would result in any of the following:

- a) Physically divide an established community (Impact LU-1)
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Impact LU-2)

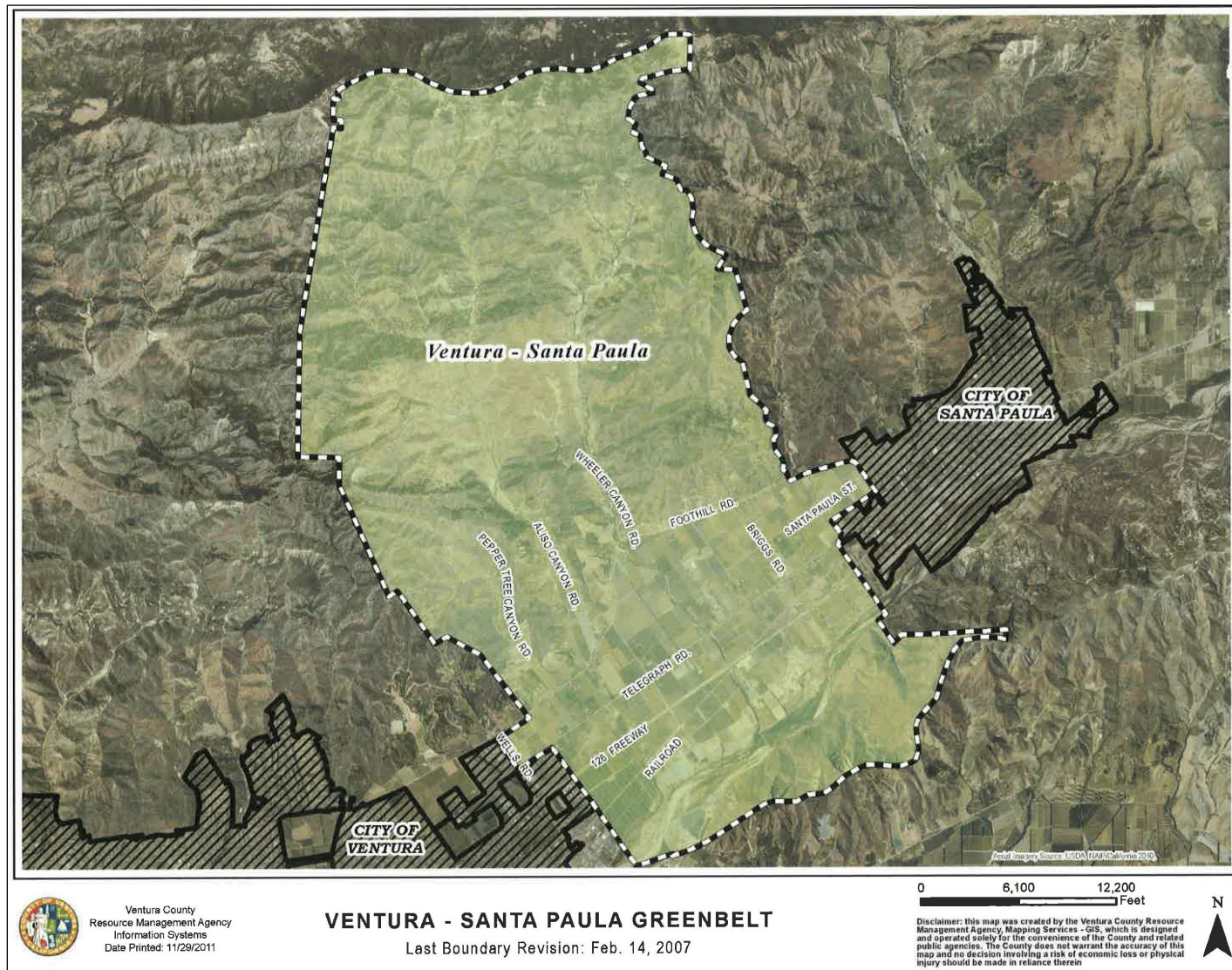


Exhibit 4.11-5 Ventura-Santa Paula Greenbelt

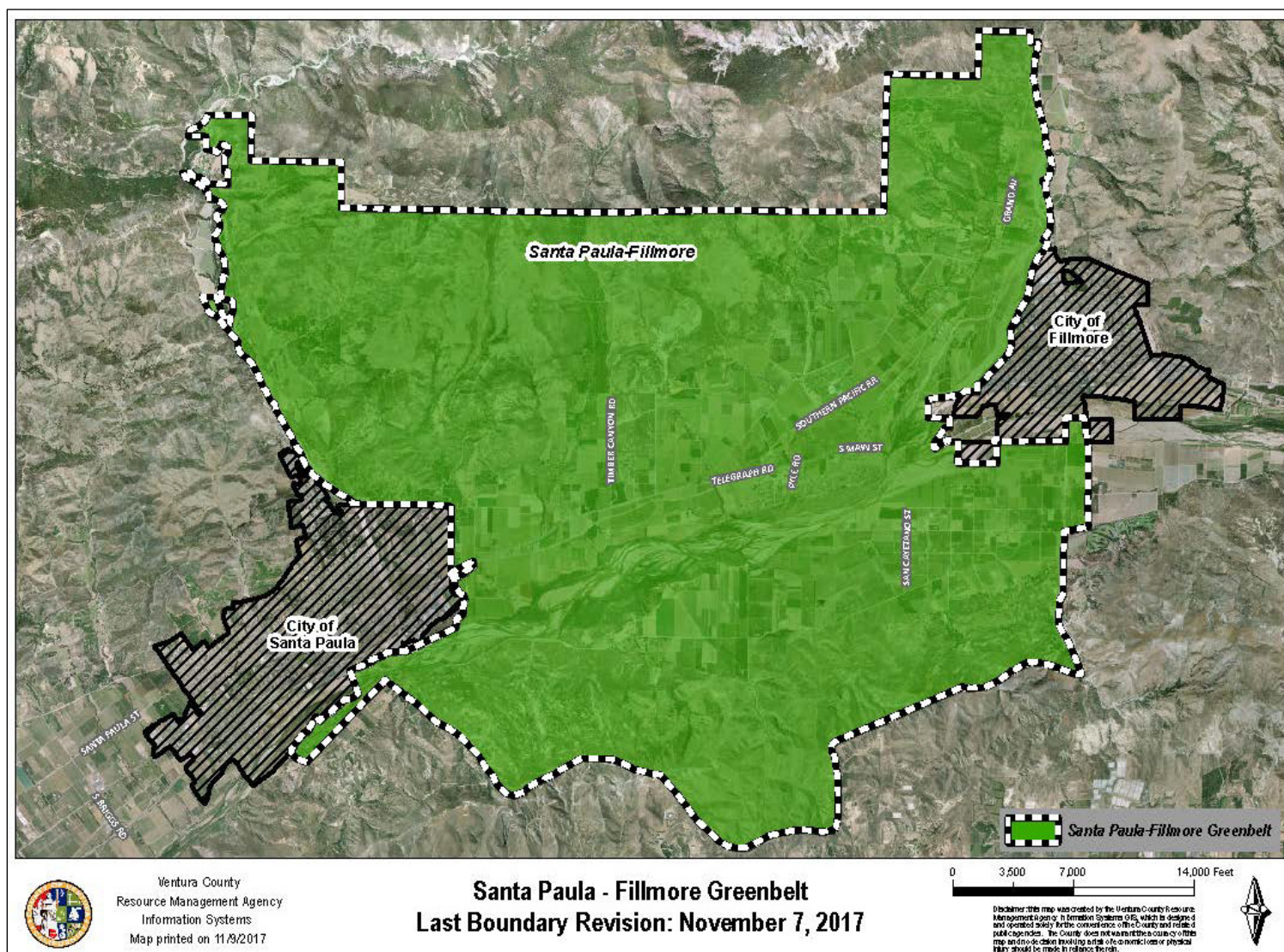


Exhibit 4.11-6 Santa Paula-Fillmore Greenbelt



4.11-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to land use and planning expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact LU-1: Physically divide an established community

Impact Discussion

Project Impacts. The 2040 General Plan Land Use Map (**Exhibit 3.4-1**) shows the proposed land use pattern for Santa Paula to the horizon year 2040. Examples of projects that could divide an established community include new freeways, flood control facilities, major electrical transmission lines, pipelines, etc. There are no proposed features in the 2040 General Plan that would have the effect of dividing an established community. In addition, the proposed policies and programs listed in **Table 4.11-2** would help to enhance connections between different parts of the city. These policies and programs would substantially reduce potential impacts to a level that is less than significant.

Table 4.11-2 General Plan Policies and Programs Related to Mobility and Community Connections

Policies	Programs
<p>LU 1.6. Grid development pattern. Encourage continued use of the grid pattern in new development to enhance access and walkability.</p> <p>LU 4.2. Linkages. Ensure that adequate linkages and transitions are provided between new developments in expansion and planning areas and existing areas of the city, and require the dedication and development of pedestrian/equestrian linkages to open space and trails at the time of annexation.</p> <p>CM 1.4 Complete streets. Apply a flexible, balanced approach to mobility system improvements that utilizes innovative design solutions and considers the safety and mobility of all modes of travel consistent with the concept of Complete Streets.</p> <p>CM 3.1 Regional coordination. Support implementation of the Ventura Countywide Bicycle Master Plan, the Ventura County Regional Bikeway Wayfinding Plan, and the City's Planned Bicycle Network. (C 5(b), 5(c), 5(d))</p> <p>CM 3.2 Encourage pedestrian activity. Ensure that streets, sidewalks and pathways are designed to encourage pedestrian activity by minimizing obstructions, appropriate grades, and locating crosswalks and pedestrian warning signs in areas of concentrated pedestrian activity.</p>	<p>CM 1.e Complete streets design standards. Establish design standards and criteria for Complete Streets to address the needs of all users including private vehicles, public transit, bicycles, and pedestrians of all ages and abilities.</p> <p>CM 2.b New development. Work with developers and service providers to ensure that new projects are designed to enhance transit connectivity and accessibility.</p> <p>HPS 2.a. Update regulations. Review flood hazard maps and data annually and ensure that the most recent regulations and sources of information are used in reviewing development proposals.</p> <p>CM 4.d Safe Routes to School. Work with school districts to support Safe Routes to School programs that improve conditions for students walking and bicycling in the areas near schools.</p>



Policies	Programs
<p>CM 3.3 Pedestrian and bicycle facilities. Ensure that new developments in expansion areas, and new commercial and industrial developments, are designed to ensure continuity with the existing non-motorized transportation network and include well-designed pedestrian and bicycle facilities, such as:</p> <ul style="list-style-type: none">• sidewalks with adequate buffers from automobile traffic;• connections to the public sidewalk system;• seating areas; and• bicycle parking and bike share facilities. <p>CM 3.4 Bicycle accessibility. Enhance bicycle accessibility between the Historic Depot, Downtown and other areas of the city, particularly districts to the north and south that are not served by the east-west Santa Paula Branch Trail.</p> <p>CM 3.5 Traffic calming. Explore traffic calming strategies including high-visibility crosswalks and curb extensions/bulb-outs to reduce pedestrian crossing distances along key corridors such as SR 150, Main Street in Downtown, the Harvard Boulevard corridor, and school zones.</p> <p>CM 3.6 Pedestrian priority focus areas. Coordinate pedestrian priority focus areas with existing and future improvement plans for Downtown and the Harvard Boulevard Corridor.</p> <p>CM 4.3 Safe routes to school. Support Safe Routes to School programs focusing on pedestrian and bicycle safety improvements near local schools.</p>	

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to dividing an established community.¹¹⁷ However, the proposed policies and programs together with nature of the proposed land use and circulation plan would substantially reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

¹¹⁷ SCAG 2016-2040 RTP/SCS PEIR, p. 3.11-34



Impact LU-2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

Impact Discussion

Project Impacts. Since the proposed project is a General Plan update that would supersede the current General Plan with the exception of the Housing Element, inconsistency with the City's current General Plan is not considered a potentially significant impact under CEQA. If the 2040 General Plan is adopted, revisions to City policies or regulations intended to implement the General Plan may be required to reconcile inconsistencies.

Conflicts between the proposed 2040 General Plan and applicable County, State or Federal policies and regulations could result in potentially significant impacts. In addition, conflicts between the proposed General Plan and policies or regulations established by the voters, such as the Save Open Space and Agricultural Resources (SOAR) ordinance, could result in environmental impacts.

As noted in the Existing Physical Conditions section above, many County, regional, State, and Federal plans, policies and regulations adopted for the purpose of reducing environmental impacts are discussed in other sections of this EIR and are not addressed here. Other land use plans, policies and regulations that are relevant to this analysis include SOAR, Santa Paula Measure L6, Ventura Local Agency Formation Commission (LAFCo) policies, and two greenbelt agreements.

- **SOAR.** The SOAR ordinance is incorporated as part of the proposed 2040 General Plan; therefore, adoption of the 2040 General Plan would not conflict with SOAR.
- **Measure L6.** Because the SOAR ordinance, including Measure L6, is incorporated as part of the proposed 2040 General Plan, no conflicts with Measure L6 would result from adoption of the 2040 General Plan.
- **Ventura LAFCo.** The proposed 2040 General Plan reflects Santa Paula's current Sphere of Influence as adopted by LAFCo on February 21, 2018 (**Exhibit 3.4-1** on page [3-6](#)). The proposed Land Use Element notes that prior to development in Expansion Areas that are outside the current SOI, such as Adams or Fagan Canyons, LAFCo approval of an amendment to the SOI as well as annexation to the City would be required. Therefore, adoption of the General Plan would not conflict with LAFCo policies.



- **Greenbelt Agreements.** Under the proposed 2040 General Plan, no development is proposed within either the Ventura-Santa Paula or the Santa Paula-Fillmore greenbelts; therefore, no conflicts with these Greenbelt Agreements would occur.

The Santa Paula Planning Area is not located within a habitat conservation plan or a natural community conservation plan, although in 2005 the Ventura County Watershed Protection District (VCWPD) and the Los Angeles County Department of Public Works jointly sponsored the preparation of the Santa Clara River Enhancement and Management Plan (SCREMP).¹¹⁸ The SCREMP was a multi-disciplinary and multi-jurisdictional effort that addressed a range of issues including water quality, groundwater recharge, flood hazards, wildlife habitat, agriculture, recreation, aggregate resources and cultural resources. The City of Santa Paula participated in the preparation of the SCREMP as a member of the Project Steering Committee. The overall purpose of the SCREMP was described as follows:

The SCREMP is not a regulatory document. It is developed as a set of policies and programs that, if adopted and implemented by the Stakeholders, are expected to promote the preservation, enhancement, and sustainability of several categories of physical, biological, and economic resources within the 500-year floodplain. Accordingly, the SCREMP anticipates that projects and activities that occur within, or that occur outside of and that may affect the 500-year floodplain, will be evaluated by the appropriate Lead Agencies on a case-by-case basis in accordance with the environmental review and compliance process contained in CEQA and/or NEPA, and that the relevant SCREMP policies and programs will be fully considered in the evaluations by those Lead Agencies.

As noted previously in the **Hydrology and Water Quality** section (page 4.10-1), the Santa Clara River and its major tributaries are within the jurisdictional authority of the VCWPD. These jurisdictional “redline” channels include the Santa Clara River, Todd Barranca, Cummings Road Drain, Briggs Road Drain, Haines Barranca, Adams Barranca, Saltmarsh Canyon, Sisar Creek, Camp Bartlett Creek, Peck Road Drain, Fagan Canyon, Santa Paula Creek, Magnolia Drive Creek, Mud Creek Canyon, Anlauf Canyon, Orcutt Canyon, Timber Canyon, O’Leary Creek, and Balcom Canyon Wash.¹¹⁹ Accordingly, City policies and activities affecting these redline channels must be consistent with VCWPD regulations.

¹¹⁸ http://www.ventura.org/wcvc/documents/PDF/SCRW/SCREMP_2005.pdf

¹¹⁹ Ventura County Watershed Protection District, Memorandum dated December 7, 2017 from Sergio Vargas, Deputy Director in response to the Notice of Preparation (see Appendix A)



Proposed General Plan policies and programs described previously in **Table 4.10-1, Table 4.10-2, Table 4.10-3** and **Table 4.10-4** would ensure consistency with VCWPD regulations and reduce potential impacts to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to conflicts with applicable land use plans, policies, or regulations.¹²⁰ However, as discussed above, the proposed General Plan would not conflict with applicable land use plans, policies or regulations; therefore, the incremental effects of implementation of the 2040 General Plan would be less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

120 SCAG 2016-2040 RTP/SCS PEIR, p. 3.11-34



4.12 Mineral Resources

4.12-1 Setting

Existing Physical Conditions

The Santa Paula area contains aggregate and petroleum resources as discussed below.

Sand and Gravel. As seen in **Exhibit 4.12-1**, the Santa Clara River is designated a significant resource area for aggregate materials. However, due to erosion problems in-river mining is no longer conducted in Ventura County. The primary area for aggregate extraction in Ventura County is the Oak Ridge Hills located near Simi Valley.

Petroleum. The Santa Paula area supports one of the oldest oil fields in California. The Union Oil Company (now a subsidiary of Chevron), was founded in Santa Paula in 1890. Locally, oil is found in certain geologic strata common to the area. The hills and mountains surrounding Santa Paula support significant oil resources. The upper portions of Adams Canyon and Fagan Canyon, Sulphur Mountain and South Mountain have been historically important sites for oil extraction. The south face of Sulphur Mountain has soils that ooze oil. There is also a sulphur spring near SR 150 at the confluence of Santa Paula and Sisar Creeks.

Local petroleum production has declined steadily in recent years in part because locally produced oil is very thick with a high sulfur content. In the industry, it is called “dirty oil” and is costly to transport and refine. There are currently no oil refineries operating in Ventura County. Air pollution restrictions make it too costly to refine locally so oil is transported to Los Angeles, Bakersfield or Texas for refining.

4. Environmental Setting and Impact Analysis
4.12 – Mineral Resources

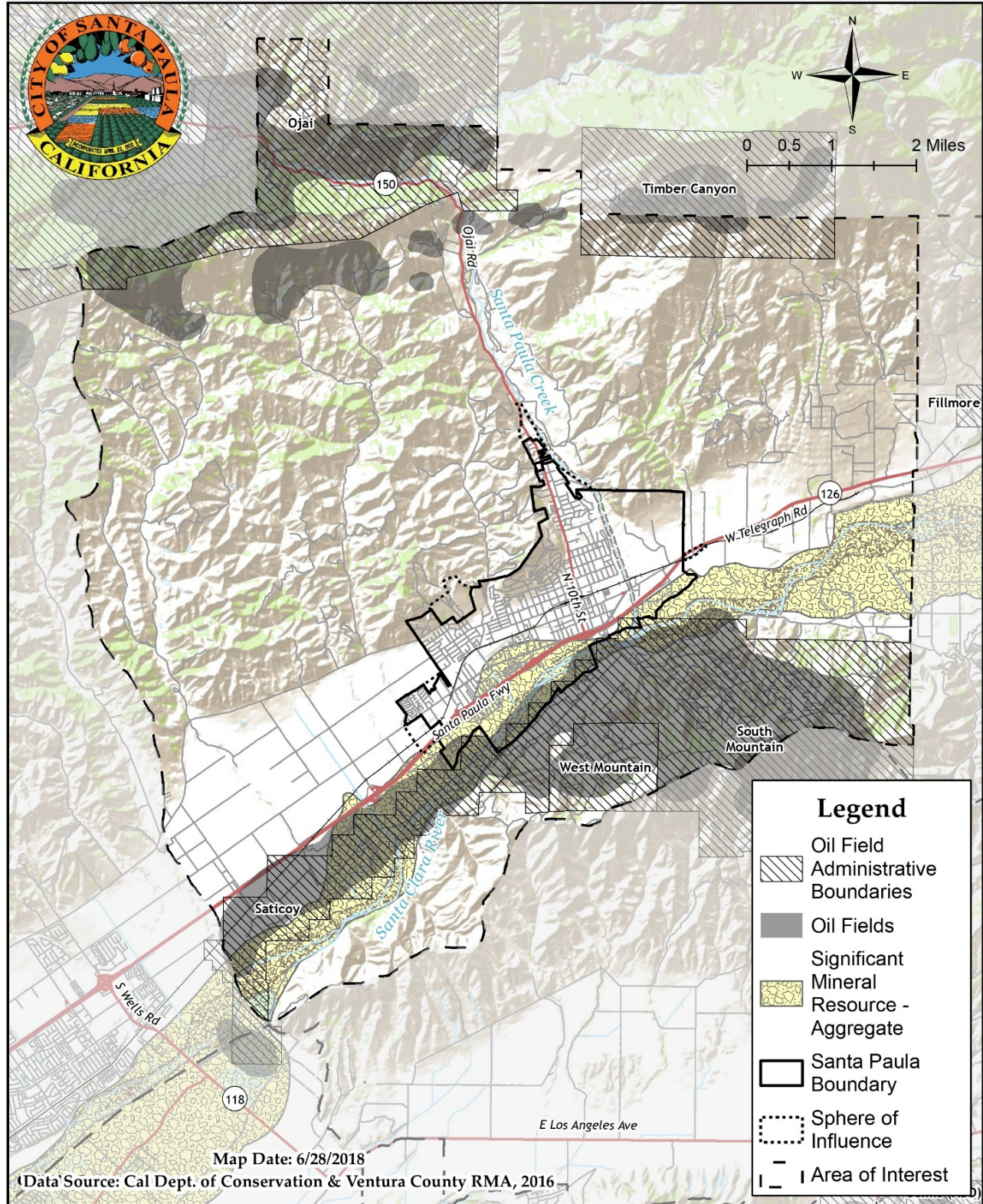


Exhibit 4.12-1 Mineral Resources



Regulatory Framework

State

Surface Mining and Reclamation Act. The Surface Mining and Reclamation Act of 1975 (SMARA) was enacted to promote conservation of the state's mineral resources, ensure adequate reclamation of mined lands, and prevent or minimize the negative impacts of surface mining to public health, property and the environment. SMARA requires the State Geologist to classify land into Mineral Resource Zones (MRZs) based upon mineral potential. The State Geologist submits the mineral land classification reports to the State Mining and Geology Board (SMGB).

The SMGB designates lands in four MRZ categories.

- MRZ-1: Areas of No Mineral Resource Significance
- MRZ-2: Areas of Identified Mineral Resource Significance
- MRZ-3: Areas of Undetermined Mineral Resource Significance
- MRZ-4: Areas of Unknown Mineral Resource Significance

The California Department of Conservation, Division of Mines and Geology (DMG) Mineral Land Classification Project publishes mineral resource maps for land use planning and mineral conservation, with updates approximately every 10 years. The designation information is transmitted to local governments for incorporation into general plans and zoning ordinances.

SMARA applies to anyone engaged in surface mining operations in California, including government agencies, and also applies to federally managed lands that disturb more than one acre or remove more than 1,000 cubic yards of material cumulatively from one site. Regulated mining activities include prospecting and exploratory activities, dredging and quarrying, streambed skimming, borrow pitting, and the stockpiling of mined materials.

Reclamation Plans. Under SMARA, there are three requirements to operate a mining facility in California:

1. A permit to mine granted by local land use permitting authority
2. A Reclamation Plan approved by the SMARA Lead Agency
3. A Financial Assurance adequate to reclaim the mining site in conformance with the approved Reclamation Plan.

Cities and counties can serve as a "Lead Agency" under SMARA if they have adopted a surface mining ordinance in conformance with SMARA requirements. As a Lead Agency, a local government can approve Reclamation Plans and conduct inspections of mining facilities.



A Reclamation Plan must delineate the configuration of the final reclaimed surface of the mining site, describe the measures taken to revegetate the site, and how the site will be restored to an alternate end use in conformance with the SMGB Reclamation Regulations.

The state requires that a Mining Report be submitted annually by each mine operator and include information about the amount of land disturbed during the previous year, acreage reclaimed during the previous year, and any amendments to the mine's reclamation plan.

Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). All Ventura County oil and gas wells located on state and private lands are permitted, drilled, operated, maintained, plugged, and abandoned under requirements and procedures administered by DOGGR.¹²¹ Additionally, DOGGR is responsible for issuing well stimulation technique permits to oil and gas operators utilizing hydraulic fracturing, acid fracturing, and/or acid matrix stimulation treatments. Currently, there are no active well stimulation permits in Ventura County. Under the requirements of the *California Public Resources Code*, the California Energy Commission in conjunction with DOGGR is required to assess oil and natural gas resources on an annual basis or as necessary.

Local

Santa Paula Municipal Code. Title XI, Chapter 120 (Oil Wells) establishes regulations for drilling permits, operating requirements, oil storage facilities, and oil field waste.

Title XVI, Chapters 16.100 through 16.104 (Surface Mining and Reclamation) establish regulations for mining permits, mine operations, and reclamation plans pursuant to SMARA.

4.12-2 Thresholds of Significance

Appendix G of the CEQA Guidelines recognizes the following significance thresholds related to mineral resources. Based on these thresholds, potential impacts could be considered significant if the 2040 General Plan would:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state (Impact MR-1)
- b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan (Impact MR-1).

¹²¹ California Statutes and Regulations for the Division of Oil, Gas, & Geothermal Resources, January 2017



4.12-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to mineral resources expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact MR-1: Loss of availability of a known mineral resource

Impact Discussion

Project Impacts. The proposed Environmental and Cultural Resources Element of the 2040 General Plan includes Figure 4-6 showing the locations of mineral resources as identified by the Department of Conservation. The proposed policies and programs (**Table 4.12-1**) would ensure that these resources are properly managed to ensure their long-term availability and would reduce potential impacts to a level that is less than significant.

Table 4.12-1 General Plan Policies and Programs Related to Mineral Resources

Policies	Programs
ECR 5.1. Mineral resource management. Ensure proper management of mineral resource lands in conformance with state law to facilitate long-term production while minimizing environmental impacts and incompatibilities with adjacent uses. Incompatible uses should not be allowed adjacent to mineral and petroleum resource areas. Compatible interim uses such as outdoor storage, lumber yards, plant nurseries and recreation that do not preclude extraction uses may be allowed in mineral resource areas. ECR 5.2. Reclamation of mineral production lands. Ensure that lands used for mineral production are reclaimed in conformance with state law and City regulations.	ECR 5.a. Mineral resource overlay zone. Designate mineral and petroleum production areas of statewide interest, as identified by the California Department of Conservation, with a Mineral Resource Overlay zoning designation. (LU IM 28; COS 8(a), IM 36) ECR 5.b. Land use planning. Only compatible development should be allowed adjacent to or near mineral deposits, mining sites, and oil, gas or geothermal development.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to mineral resources.¹²² However, the proposed policies and programs would reduce the incremental effects of implementation of the 2040 General Plan to a level that is less than cumulatively considerable.

¹²² SCAG 2016-2040 RTP/SCS PEIR, p. 3.12-10

4. Environmental Setting and Impact Analysis
4.12 – Mineral Resources



Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant



4.13 Noise

4.13-1 Setting

This section discusses impacts related to noise under existing and future conditions with development as anticipated in the 2040 General Plan. The analysis in this section related to roadway noise is based upon the technical noise study provided in **Appendix C**.

Characteristics of Noise

Noise is usually defined as unwanted sound and can be an undesirable byproduct of society's normal day-to-day activities. Noise becomes unwanted when it interferes with normal activities, causes physical hardship, or has an adverse effect on health. The definition of noise as unwanted sound implies that it has an adverse effect or causes a substantial annoyance to people and their environment.

Noise is measured on a logarithmic scale of sound pressure known as a decibel (dB). Sound pressure alone is not a reliable indicator of loudness because the human ear does not respond uniformly to sounds at all frequencies. For example, the ear is less sensitive to low and high frequencies than to medium frequencies that more closely correspond with human speech. In response to the human ear's varying sensitivity to different frequencies, the A-weighted noise level, referenced in units of dB(A), was developed to better correspond to a person's subjective judgment of sound levels.

In general, changes in a community noise level of less than 3 dB(A) are not typically noticed by the human ear.¹²³ Relative changes of 3 to 5 dB(A) may be noticed by some individuals who are extremely sensitive to changes in noise. Typically, an increase of greater than 5 dB(A) is readily noticeable, while the human ear perceives a sound level increase of 10 dB(A) as a doubling of sound volume. In contrast, a doubling of sound energy would result in only a 3 dB(A) increase in sound, a barely perceptible change in sound level for most people.

Noise sources typically occur in two forms: Point sources such as stationary equipment or individual motor vehicles; and mobile sources, such as roadways with a large number of motor vehicles. Sound generated by a stationary point source typically attenuates (diminishes) at a rate of 6.0 dB(A) for each doubling of distance from the source to the receptor at acoustically "hard" sites, and at a rate of 7.5 dB(A) at acoustically "soft" sites. An acoustically "hard" or reflective site does not provide any excess ground-effect attenuation and is characteristic of sites with asphalt, concrete, and very hard-packed soils. An acoustically "soft" or absorptive site is characteristic of

¹²³ U.S. Department of Transportation, Federal Highway Administration, *Highway Noise Fundamentals*, 1980, pg. 81.



normal earth and ground with vegetation.¹²⁴ For example, a 70 dB(A) noise level measured at 50 feet from a point source at an acoustically hard site would be 64 dB(A) at 100 feet from the source and would be 58 dB(A) at 200 feet from the source. Sound generated by a line source typically attenuates at a rate of 3 dB(A) and 4.5 dB(A) per doubling distance from the source to the receptor for hard and soft sites, respectively.¹²⁵ Manmade or natural barriers can also attenuate noise levels. Solid walls and berms may reduce noise levels by 5 to 10 dB(A).¹²⁶

Structures that are developed in California must comply with California Building Code standards. The Building Code provides information on materials that can be used in the design of structures to attenuate outdoor noise to levels that are considered acceptable for building occupants. **Table 4.13-1** shows the typical attenuation of exterior to interior noise provided by structures developed in California.

Table 4.13-1 Typical Outside to Inside Noise Attenuation for Building Types

Structure Type	Structure with Open Windows dB(A)	Structure with Closed Windows* dB(A)
Hotels	17.0	25.0
Schools	17.0	25.0
Churches	20.0	30.0
Hospitals	17.0	25.0
Business offices	17.0	25.0
Movie theaters	20.0	30.0
Residential units	17.0	25.0

Source: Bolt Beranek and Newman, Inc. Highway Noise: A Design Guide for Highway Engineers, NCHRP Report No. 117, 1971.

*Structures with closed windows can attenuate exterior noise by a minimum of 35.0 to 30.0 dB(A).

There is a need for a scale that averages varying noise exposure over time and quantifies the results in terms of single number descriptor. Several scales have been developed that address community noise levels. The scales that are applicable to this analysis are the Equivalent Noise Level (L_{eq}) and the Community Noise Equivalent Level (CNEL). L_{eq} is the average A-weighted sound level measured over a given time interval and can be measured over any period of time, but is typically measured for 1-minute, 15-minute, 1-hour, or 24-hour periods. CNEL is another average A-weighted sound level measured over a 24-hour period. However, the CNEL noise scale is adjusted to account for some individuals' increased sensitivity to noise during evening and nighttime hours. A CNEL noise measurement is obtained by adding 5 dB to sound levels

124 U.S. Department of Transportation, Federal Highway Administration, *Highway Noise Fundamentals*, 1980, pg. 97.

125 U.S. Department of Transportation, Federal Highway Administration, *Highway Noise Fundamentals*, 1980, pg. 97.

126 U.S. Department of Transportation, Federal Highway Administration, *Highway Noise Fundamentals*, 1980, pg. 18.



occurring during the evening from 7:00 p.m. to 10:00 p.m. and 10 dB to sound levels occurring during the nighttime from 10:00 p.m. to 7:00 a.m. The 5 and 10 dB “penalties” are applied to account for increased noise sensitivity when residents are typically relaxing at home or sleeping. The CNEL typically is within approximately 3.0 dB(A) of the peak traffic hour L_{eq} .¹²⁷

Characteristics of Vibration

Vibration is a form of noise with energy carried through structures and the earth, whereas noise is carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise such as the rattling of windows from passing trucks on a highway. This phenomenon is related to the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration, which spreads through the ground rapidly, diminishes in amplitude with distance from the source. The ground motion caused by vibration is measured as peak particle velocity (PPV). PPV is the speed at which a particle of earth moves and is expressed in units of inches per second. Vibration also is measured as the root mean square amplitude of a motion over a one-second period. For convenience, the logarithmic decibel scale is used to describe vibration velocity level relative to a reference level of 10^{-6} inches per second and is expressed as vibration decibels (VdB).

The vibration velocity level threshold of perception for humans is approximately 65 VdB.¹²⁸ A vibration velocity of 75 VdB is considered the approximate dividing line between barely and distinctly perceptible levels for many people.¹²⁹ Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible ground-borne vibration include construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is barely perceptible.¹³⁰ The range of interest is from approximately 50 VdB, which is the typical background vibration velocity, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

The estimated vibration levels of construction equipment at various distances are presented in **Table 4.13-2** below.

127 California Department of Transportation, *Technical Noise Supplement: A Technical Supplement to the Traffic Noise Analysis Protocol*, 1998, pgs. N51 to N54.

128 U.S. Department of Transportation, Federal Transit Administration, Office of Planning and Environment, *Transit Noise and Vibration Impact Assessment (FTA-VA-90-1003-06)*, 2006, pg. 7-5.

129 U.S. Department of Transportation, *Transit Noise and Vibration Impact Assessment*, 2006, pgs. 7-6 and 7-7.

130 U.S. Department of Transportation, *Transit Noise and Vibration Impact Assessment*, 2006, pg. 7-9. Rubber tires and suspension systems provide vibration insulation.



Table 4.13-2 Approximate Vibration Levels Induced by Construction Equipment

Equipment	Approximate Vibration Levels (VdBA)*				
	25 feet	50 feet	100 feet	150 feet	350 feet
Pile Driver	93	87	81	77	70
Large Bulldozer	87	81	75	71	64
Loaded Truck	86	80	74	70	63
Jackhammer	79	73	67	63	56
Small Bulldozer	58	52	46	42	35

* FTA Transit Noise and Vibration Impact Assessment, Chapter 12, Construction, 2006

Construction Noise

No specific development project is proposed in connection with the 2040 General Plan; however, noise would be generated during construction of future projects anticipated in the Plan.

Construction noise impacts would vary depending on the location, size and type of project and the type of construction equipment used. **Exhibit 4.13-1** shows the typical noise levels generated by various types of construction equipment. Earthmoving equipment can exceed 90 dB(A) and average about 85 dB(A) at 50 feet from the source when the equipment is operating at typical loads, and pile drivers can exceed 100 dB(A) at 50 feet. Most heavy equipment operates with varying load cycles over an extended period of time.

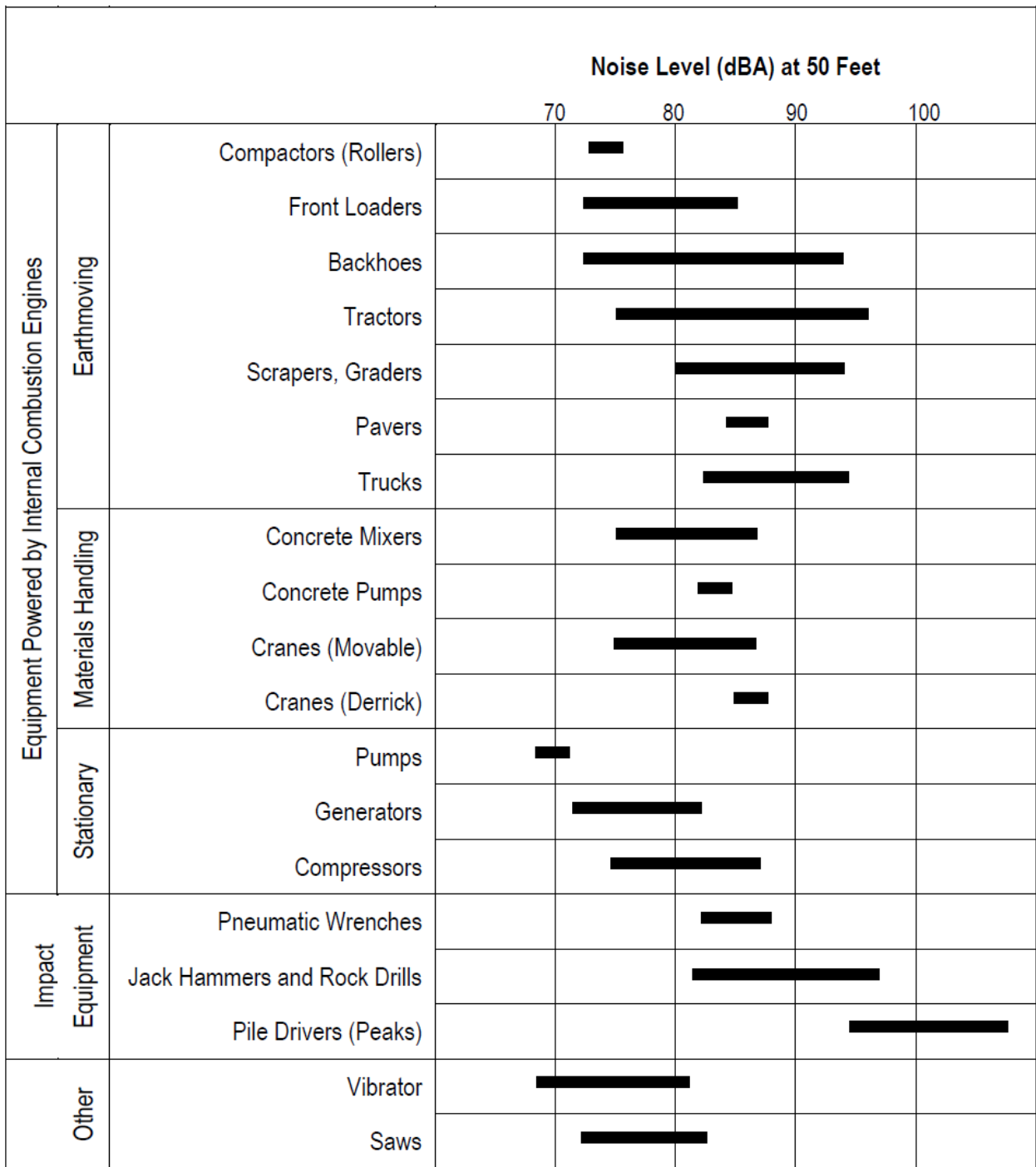
Existing Noise Conditions

Roadway Noise

Existing roadway noise levels were estimated based on the existing traffic characteristics using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108). The existing noise levels along studied roadway segments are shown in **Table 4.13-5** on page [4.13-19](#). As shown in this table, there are 12 road segments where existing noise levels exceed the exterior standards shown in the Land Use/Noise Compatibility Matrix (**Exhibit 4.13-3** on page [4.13-13](#)).

Aviation Noise

Santa Paula Airport is a privately-owned general aviation facility located within the south-central portion of the city, and is bounded by SR 126 on the north, Palm Avenue on the west, Ojai Street on the east, and the Santa Clara River on the south. Additional discussion of the airport's characteristics is provided in **Section 4.9 – Hazards and Hazardous Materials**.



EPA PB 206717, Environmental Protection Agency, December 31, 1971, "Noise from Construction Equipment and Operations."

Exhibit 4.13-1 Typical Construction Equipment Noise Generation Levels



Aircraft noise is generally not a problem in Santa Paula because the air traffic pattern is generally south of the city, over the Santa Clara River. Local ordinance requires that aircraft maintain an altitude of at least 1,500 feet above sea level when approaching or departing the city. The primary noise concern noted by the public relating to the airport is aerobatics, which are periodically practiced east of the city. The airport property is surrounded by industrial development on either end of the runway. The SR-126 freeway provides a barrier to the north, while there is generally no development to the south due to the presence of the Santa Clara River floodplain. Aircraft noise contours are shown in **Exhibit 4.13-2**. No properties designated for single-family use in the 2040 General Plan are within the 60 dB noise contour; however, some nonconforming single-family homes north of the freeway and west of Palm Avenue are within the 60 dB contour. The 65 dB contour, which is considered acceptable for multi-family residential use, is restricted to property south of the freeway where there is no residentially-designated land in the 2040 General Plan. No noise-sensitive land uses are designated within the 70 or 75 dB contours.

Rail Noise

Historically the Santa Paula Branch Line Railroad was heavily used. Now, however, regular rail traffic has stopped, primarily because the railroad tracks have been removed between Piru and Santa Clarita, and the corridor in that area is privately owned. The Fillmore & Western Railroad operates tourist excursion trains on weekends between Fillmore and Santa Paula.¹³¹ The railroad is also used by the Weyerhaeuser plant and local agricultural operations in Santa Paula and occasionally by Hollywood film productions that use Santa Paula as a backdrop. Consequently, the limited operations on the rail line do not create a serious noise concern.

Commercial and Industrial Noise

Commercial operations located in the area of Laurie Lane, Steckel Drive, Harvard and Palm Streets, Main and 7th Streets, and in the Downtown, may produce noise that affects nearby sensitive land uses such as homes and schools. However, these effects are generally minor. Noise due to commercial uses has not been a significant issue in the community.

Industrial development is located along Telegraph Road, Peck Road, Main Street and south of the freeway adjacent to the airport. Noise generated by plant operations and heavy equipment may impact nearby residential areas, parks, schools, and a mental care facility.

¹³¹ <http://www.fwry.com/>

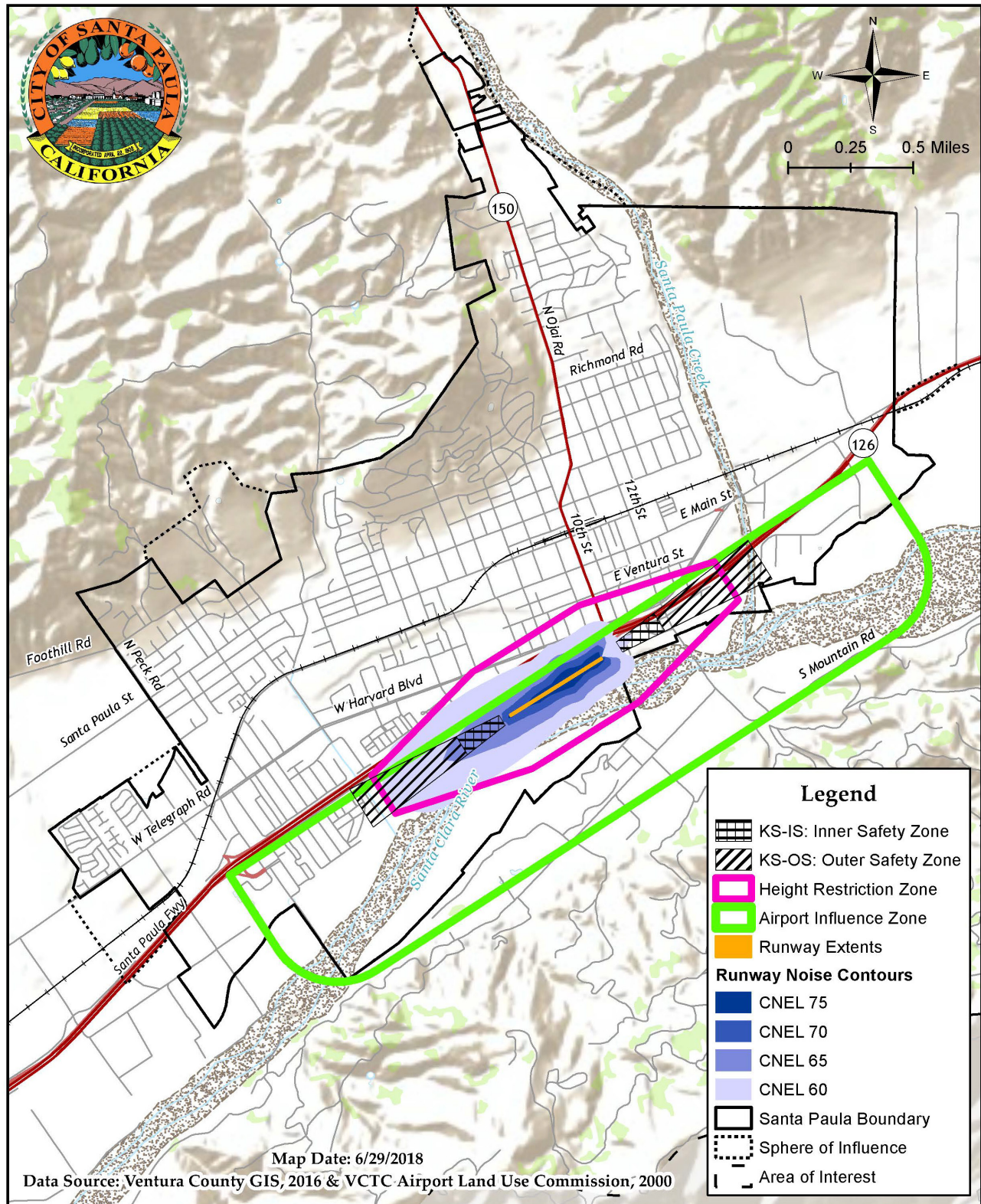


Exhibit 4.13-2 Aircraft Noise Contours



Agricultural Noise

Noise from tractors and other agricultural equipment such as frost control are the major sources of agricultural noise. Many of these noise sources lie outside the city and are related to seasonal operations. Packing operations, including refrigeration trucks, and movement of farm equipment are sources of noise that have the greatest potential to affect the city, but are not a constant source of noise. Farm equipment movement usually occurs on Santa Paula Street and Harvard Boulevard during busy agricultural times of the year.

Nuisance Noise

Nuisance noise sources in residential areas include such things as air conditioners, gardening equipment, power tools, generators, amplified music and barking dogs. The effects of nuisance noise can be compounded by the time of day, volume, and proximity to sensitive receptors. For instance, a loud party might be acceptable in the early evening hours but be considered a nuisance during late night and early morning hours. The City's Noise Ordinance (SPMC Chapter 93) contains regulations limiting the allowable noise generated by equipment, private parties, and animal noise.

Construction Noise and Vibration

As illustrated in **Exhibit 4.13-1** noise levels generated by construction equipment can be very loud. Although temporary, construction near noise-sensitive uses has the potential to be an annoyance. In order to minimize disturbance, the City's Noise Ordinance (SPMC Chapter 93) limits the allowable hours of construction. Construction activities that occur between 8:00 a.m. and 6:00 p.m. Monday through Friday are exempt from noise regulations. Noise generated by residents personally undertaking construction activities to maintain or improve their property on Saturdays, Sundays, or holidays between 9:00 a.m. and 5:00 p.m. are exempt from noise regulations unless noise levels exceed 85 dBA at 50 feet. Emergency repair work is also exempt from City noise regulations.

Regulatory Framework

Federal

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA) under the United States Environmental Protection Agency (USEPA). Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan.

The United States Department of Housing and Urban Development (HUD) has set a goal of 65 dB(A) L_{dn} as a desirable maximum exterior standard for residential units developed under



HUD funding. L_{dn} is a 24-hour time-average noise measurement very similar to CNEL. While HUD does not specify acceptable interior noise levels, standard construction of residential developments under California's Title 24 building regulations typically provides 20 dB(A) of attenuation with the windows closed. Based on this premise, HUD's interior noise standards can assume to reflect an interior L_{dn} not exceeding 45 dB(A).

The Federal Transit Administration has also published guidance for noise and vibration assessments.¹³²

State

General Plan Law. *California Government Code* §65302(f) requires each local government to adopt and implement a noise element as part of its general plan. The noise element must identify current and projected noise levels for major sources of noise in the community and include implementation measures and possible solutions that address existing and foreseeable noise problems.

California Building Code. California's noise insulation standards are established in the California Code of Regulations, Title 24, Part 2. Noise standards apply to interior noise levels resulting from exterior noise sources. The regulations require an acoustical study when noise-sensitive buildings (e.g., residential, schools, hospitals) are located where the exterior noise level is 60 dBA CNEL or higher. The acoustical study must demonstrate that the interior noise in habitable rooms will not exceed 45 dBA CNEL in noise-sensitive buildings.¹³³ These building standards have been adopted by reference in Chapter 150 of the Santa Paula Municipal Code.

Governor's Office of Planning and Research. The Governor's Office of Planning and Research (OPR) publishes the General Plan Guidelines, which provide recommended standards for the acceptability of various types of land uses within specific noise contours. The noise standards are intended to provide guidelines for the development of noise elements. These basic guidelines may be tailored to reflect the existing noise and land use characteristics of a particular community. The Noise/Land Use Compatibility Matrix (**Exhibit 4.13-3**) show the exterior noise standards recommended by OPR for new development projects according to land use.¹³⁴

132 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018, Table 5-5, (https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

133 <http://www.bsc.ca.gov/Codes.aspx>

134 Governor's Office of Planning and Research, *General Plan Guidelines*, 2017 (http://www.opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf)



Caltrans. While there are no State standards for vibration, Caltrans establishes vibration risk for structures. For continuous, frequent, and intermittent vibration, Caltrans considers the architectural damage risk level to be somewhere between 0.08 and 0.6 inches per second (in/sec) PPV depending on the type of building that is affected.¹³⁵

Santa Paula Municipal Code

The City's Noise Ordinance (Title IX, Chapter 93 of the Santa Paula Municipal Code) regulates against loud or unnecessary noise and defines sources of such noise. Operation of machines, construction work, and other sources of noise are restricted by time of day and noise level. The ordinance specifies noise sources that are normally exempt from standards, such as motor vehicle noise, construction activities between 8:00 a.m. and 6:00 p.m. Monday through Friday, and emergency work.

§93.21 of the Noise Ordinance establishes maximum allowable sound levels for different land use categories as shown in **Table 4.13-3**.

§16.27.050 of the Development Code (Municipal Code Title XVI) establishes special performance standards for Airport zones, including vibration standards. §16.27.050(E) provides that "No operation is permitted that emits ground vibrations perceptible without instruments beyond the property lines of the parcel of origin."

Table 4.13-3 City of Santa Paula Sound Level Limits by Land Use Category

Land Use (Receptor Property)	Time Period	Maximum Exterior Noise Level (dB)*
Residential	10:00 p.m. to 7:00 a.m. (nighttime) 7:00 a.m. to 10:00 p.m. (daytime)	60 dbA 65 dbA
Neighborhood Commercial	Anytime	65 dbA
Commercial & Office	Anytime	70 dbA
Industrial	Anytime	75 dbA
Schools, Libraries, Hospitals, Community Care facility, and Assembly Halls	Anytime	65 dbA

*If an alleged noise disturbance contains a steady, audible tone, such as a whine, screech, beating, pulsating, throbbing, or hum, the sound level limits set forth in this chapter will be reduced by five dB for purposes of determining whether a violation exists.

Section 93.23 of the Municipal Code establishes the following exceptions to these noise limits:

- (A) Construction activities between 8:00 a.m. and 6:00 p.m. Monday through Friday. Persons responsible for such construction activities, for example and without

135 California Department of Transportation, Transportation and Construction Vibration Guidance Manual September 2013. (<https://evogov.s3.amazonaws.com/media/17/media/119601.pdf>)



limitation, the general contractor or property owner, must post notice at all entrances to the construction site listing the noise limitations on construction set forth in this chapter. Such notice must be titled in letters at least one inch in height and be placed at least five feet above ground level.

- (B) Residents/property owners personally undertaking construction activities to maintain or improve their property on Saturdays, Sundays, or holidays between the hours of 9:00 a.m. and 5:00 p.m.
- (C) Powered equipment used on a temporary, occasional or infrequent basis operated between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday. No piece of equipment may generate noise in excess of 5 dBA at 50 feet.
- (D) Residents/property owners personally using powered equipment to maintain their property and/or residence on Saturdays, Sundays or holidays between the hours of 9:00 a.m. and 5:00 p.m. No piece of equipment must generate noise in excess of 85 dBA at 50 feet.
- (E) Deliveries to food retailers and restaurants.
- (F) Deliveries to other commercial and industrial businesses between 7:00 a.m. and 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. Saturdays, Sundays and holidays.
- (G) Occasional social gatherings between 11:00 a.m. and 12:00 a.m., provided the noise level for the occasional social gathering measured from any adjacent residential property does not exceed 65 dBA.
- (H) Sounds from animals or birds unless such animal or bird howls, barks, meows, squawks, or makes other noises continuously and/or incessantly for a period of five minutes or intermittently for one-half hour. For the purposes of this section, the animal or bird noise is not a noise disturbance if a person is trespassing or threatening to trespass upon private property in or upon which the animal or bird is situated or if the noise is for any other legitimate cause, such as someone teasing or provoking the animal or bird.

Chapter 150 of the Municipal Code also adopts the state building codes by reference.

4.13-2 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the project would result in a significant impact if the following were to occur:

- a.) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (Impacts N-1 and N-2);
- b.) Generation of excessive ground-borne vibration or ground-borne noise levels (Impact N-3);



- c.) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels (Impact N-4).

Noise impacts are considered significant if they would expose persons to levels that exceed standards established in Federal, State or City regulations. Exterior noise standards in Santa Paula are shown in **Exhibit 4.13-3** and interior noise standards are established by the Municipal Code and the State Building Code. Failure to achieve these standards would be considered a significant impact.

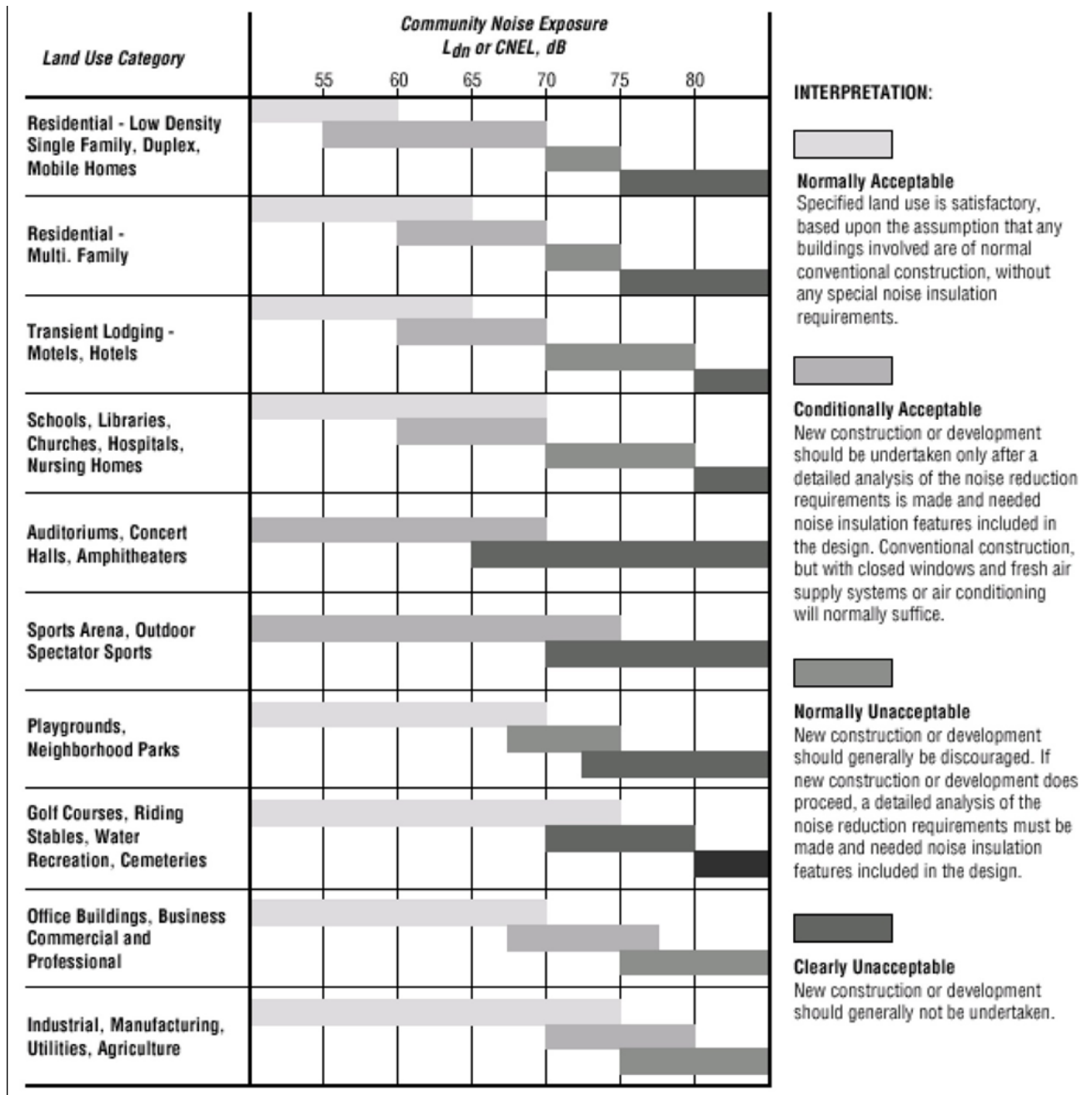
Impacts may also be significant if they create a substantial permanent or temporary increase in noise levels. The term “substantial” is not quantified in CEQA. For purposes of this analysis, any increase in ambient noise levels would be considered a significant impact if the resulting noise level exceeds the *normally acceptable* level shown in the Land Use/Noise Compatibility Matrix (**Exhibit 4.13-3**). An increase of 5.0 dB(A) or greater would be considered a substantial increase and a significant impact even if the resulting noise level is within the *normally acceptable* level.

Noise generated by construction and temporary equipment operation is governed by City regulations limiting the allowable times of these activities (SPMC Section 93.23). CEQA Guidelines Appendix G states that if an impact is regulated by a rule or regulation specifically designed to control a given type of impact (such as construction noise), then compliance with that rule may be used in support of a finding that the impact is less than significant. In accordance with this provision of CEQA, noise impacts generated by construction in compliance with the City’s Noise Ordinance are considered less than significant.

4.13-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to noise expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The analysis in this section related to roadway noise is based upon the technical noise study provided in **Appendix C**. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.



General Plan Guidelines, 2017; California Governor's Office of Planning and Research; Appendix D, Figure 2, page 374

Exhibit 4.13-3 Land Use/Noise Compatibility Matrix



Impact N-1: Temporary increase in noise levels

Impact Discussion

Project Impacts. Although no specific development projects are proposed as part of the 2040 General Plan, future construction activities anticipated in the Plan would result in temporary noise. During site preparation and construction, the use of heavy equipment could cause temporary noise that may affect sensitive uses near the construction site. Typical noise levels from construction activities were shown previously in **Exhibit 4.13-1** and **Table 4.13-2**. In order to minimize disturbance, the City’s Noise Ordinance (SPMC Chapter 93) limits the allowable hours of construction to between 8:00 a.m. and 6:00 p.m. Monday through Friday with limited exceptions such as emergency work. In addition, the 2040 General Plan policies and programs listed in **Table 4.13-4** would help to mitigate short-term noise impacts. While the current Noise Ordinance and proposed General Plan policies would substantially reduce short-term noise impacts from development anticipated under the 2040 General Plan, it is possible that in some sensitive locations and circumstances, particularly infill development, such impacts could remain significant.

Table 4.13-4 General Plan Policies and Programs Related to Temporary Noise and Vibration

Policies	Programs
<p>HPS 6.5 Construction noise and ground-borne vibration. Minimize disturbance from construction noise and ground-borne vibration to the greatest extent feasible through techniques such as:</p> <ul style="list-style-type: none"> - Limiting hours of construction operations - Limiting times of year for construction near schools - Requiring construction equipment to utilize current noise reduction technology - Use electrically-powered equipment rather than gasoline- and diesel-powered equipment whenever feasible - Limiting truck idling near noise-sensitive uses - Locating staging areas as far away from noise-sensitive uses as feasible - Limiting construction traffic to designated routes that avoid noise-sensitive uses - Minimizing use of pile-drivers and vibratory rollers near noise-sensitive uses or structures that are sensitive to vibration, such as historic buildings. If pile-driving is necessary in such locations due to geological conditions, require the use of “quiet pile driving” techniques such as predrilling to minimize noise and vibration - Require temporary noise barriers and shielding when work occurs near noise-sensitive uses 	<p>HPS 6.d Noise Ordinance. Review and update the Noise Ordinance (SPMC Chapter 93) on a regular basis to reflect changes in state or federal law and City policy.</p> <p>HPS 6.f Development review. As part of the development review process, assist applicants in demonstrating that interior and exterior noise levels for the proposed land uses will be in conformance with the Land Use/Noise Compatibility Matrix and the Noise Ordinance. Unless a proposed development is within the <i>Normally Acceptable</i> noise contour, the applicant shall provide a site-specific noise study prepared by a qualified acoustical engineer demonstrating conformance with applicable interior and exterior noise standards. The determination of whether a project site is within the <i>Normally Acceptable</i> range shall be made by the Planning Department.</p> <p>When a proposed development would result in noise levels requiring mitigation, preference for mitigation measures shall be in the following order:</p> <ol style="list-style-type: none"> 1. Site layout, including setbacks, open space separation and shielding of noise sensitive uses with non-noise-sensitive uses. 2. Acoustical treatment of buildings. 3. Structural measures: construction of earthen berms or wood or concrete barriers. <p>For mixed-use projects, applicants shall demonstrate that noise levels for sensitive uses within the development will not exceed adopted interior and exterior standards.</p> <p>As part of the development review process, the City shall require all feasible methods of minimizing construction noise.</p>



Policies	Programs
<ul style="list-style-type: none">- Provide advance written notice of construction activities and schedules to residents and other noise-sensitive uses adjacent to construction sites, including contact information for a City official having authority to investigate noise complaints and require appropriate mitigation	<p>HPS 6.g Santa Paula Airport. Work cooperatively with Santa Paula Airport officials to resolve operational noise concerns, including those resulting from aerobatics and air shows.</p> <p>HPS 6.i Agricultural noise. Work with agricultural property owners in and around the city to address any identified noise problems relating to the use of farm equipment, such as frost protection equipment and farm machinery on city streets.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to temporary noise levels.¹³⁶ Although the proposed 2040 General Plan policies and programs together with existing City regulations would substantially reduce incremental temporary noise effects, impacts would still be considered to be cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs

Level of Significance after Mitigation

Significant impact

Impact N-2: Permanent increase in noise levels

Impact Discussion

Project Impacts

Traffic Noise

Traffic is the major long-term source of unwanted noise in most areas of Santa Paula. (Aircraft noise is discussed under Impact N-3 below.) As described in **Section 4.17 – Transportation**, future development consistent with the 2040 General Plan would result in an incremental increase in traffic volumes along many roadways. The increase in traffic volumes would result from additional development within Santa Paula and from

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cumulative regional growth. An increase in traffic volume is typically accompanied by higher noise levels adjacent to roads.

The exterior noise standards shown in **Exhibit 4.13-3** are recommended by OPR and have been adopted by the City in the current Noise Element.¹³⁷ These exterior standards are based upon the interior noise levels that are typically achieved. As noted in **Table 4.13-1** (page [4.13-2](#)), standard construction techniques result in interior noise levels that are approximately 25 to 30 dB lower than exterior levels. State law establishes an interior noise limit of 45 dBA for habitable rooms. The 2040 General Plan would continue to utilize these standards. The acceptability of ambient exterior noise levels is dependent on the type of land use, with noise-sensitive uses such as residential and hotels/motels having the lowest “normally acceptable” noise levels. Commercial and industrial uses are considered less noise-sensitive and have higher tolerances for exterior noise. In new developments it is desirable to locate noise-sensitive uses away from heavily-traveled streets; however, many older communities such as Santa Paula were developed prior to the adoption of noise compatibility standards, and residential uses are often found along busy streets where noise levels are considered unacceptable under current standards.

Based upon traffic characteristics, noise levels along roadways have been estimated for both current (2016) and 2040 General Plan horizon year conditions. Technical data supporting this noise analysis is provided in **Appendix C**.

Exhibit 4.13-4 shows estimated 2016 noise contours based on current traffic conditions while **Exhibit 4.13-5** shows estimated noise contours that would be generated by projected traffic volumes in the 2040 General Plan horizon year. **Table 4.13-5** compares noise levels in 2016 and 2040 for each road segment based on existing and projected traffic conditions. It is important to note that the estimated noise levels are based upon standard assumptions and do not consider topography or other site conditions that could reduce noise levels; therefore, it is considered a worst-case scenario.

¹³⁷ Current Noise Element Policy 1.a.a. and Figure N-1: Noise Compatibility Matrix

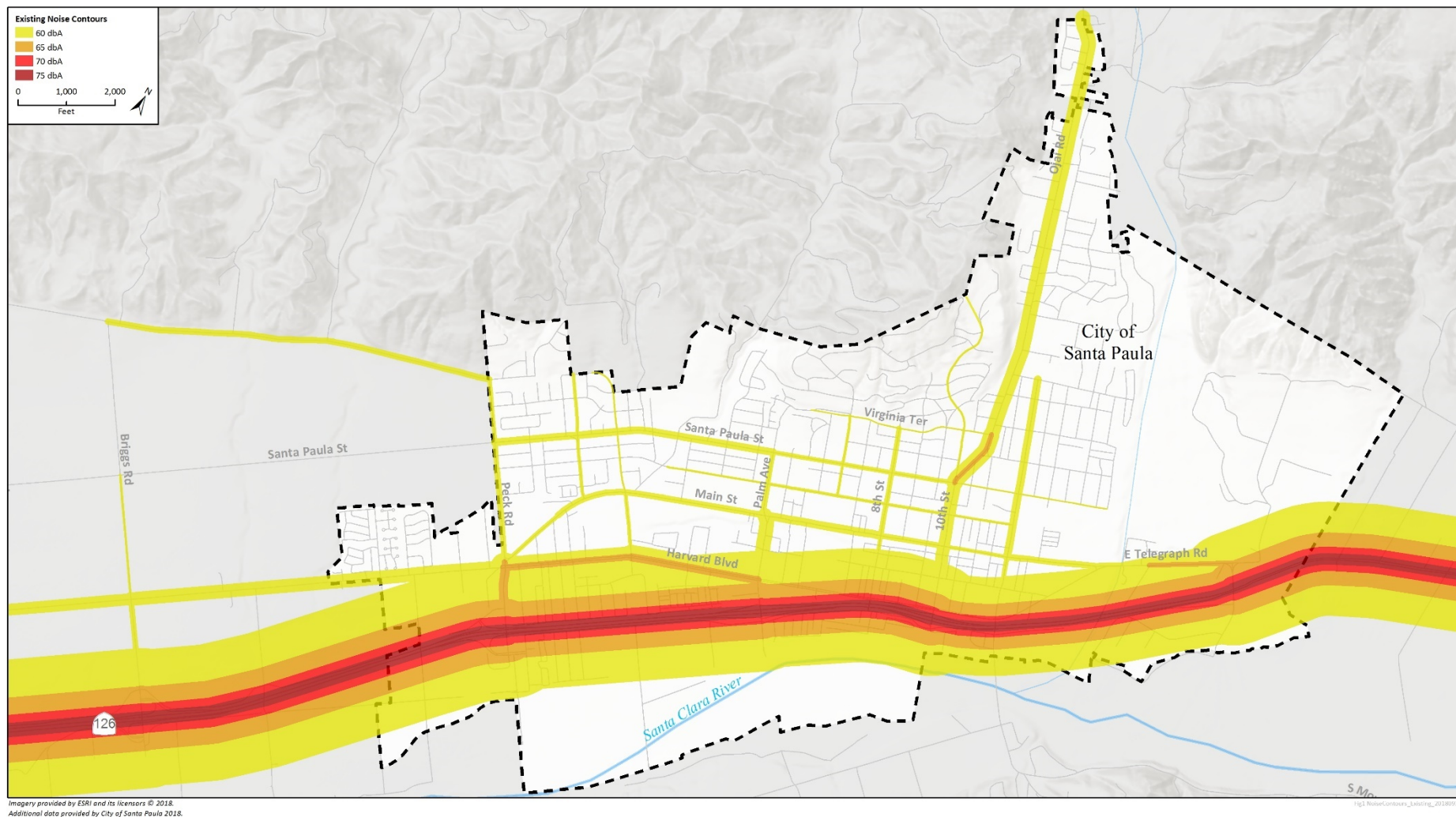


Exhibit 4.13-4 Existing (2016) Roadway Noise Contours



Table 4.13-5 Existing (2016) vs. Projected 2040 Roadway Noise Levels

Roadway	Segment	Projected (2040)	Existing (2016)	Increase	Adjacent Land Use
Briggs Road	Santa Paula Street to Telegraph Road	58.2	57.1	1.1	
	Telegraph Road to SR-126 WB Ramps	61.5	60.6	0.9	Ag (Unincorporated)
	SR-126 WB Ramps to SR-126 EB Ramps	61.4	60.1	1.4	Ag (Unincorporated)
	SR-126 EB Ramps to Pinkerton Road	60.0	58.6	1.4	Ag (Unincorporated)
Peck Road	Northern terminus to Foothill Road	48.2	46.1	2.1	
	Foothill Road to Santa Paula Street	60.4	59.4	0.9	SFR/Ag (Unincorporated)
	Santa Paula Street to Santa Barbara Street	61.8	60.2	1.7	SFR/Ag (Unincorporated)
	Santa Barbara Street to Main Street	62.4	60.8	1.6	SFR/Institutional/Lt Industrial
	Main Street to Telegraph Road	67.4	65.9	1.6	Ag/SFR/Lt Industrial (Unincorporated)
	Telegraph Road to Faulkner Road	69.2	67.8	1.4	Commercial/OS
	Faulkner Road to SR-126 EB Ramps	67.7	65.8	2.0	MDR/MF/Commercial
	SR-126 EB Ramps to southern terminus	63.9	57.5	6.4	MFR/ROW
Cameron Street	Foothill Road to Main Street	59.5	58.7	0.8	MFR/OS/Lt Ind/Inst/Ag
Steckel Drive	Foothill Road to Main Street	56.9	55.9	1.1	
	Main Street to Harvard Boulevard	59.5	59.0	0.6	
	Harvard Boulevard to southern terminus	56.1	55.6	0.5	
Palm Avenue	Northern terminus to Santa Paula Street	55.8	54.5	1.3	
	Santa Paula Street to Santa Barbara Street	61.4	60.2	1.1	MFR
	Santa Barbara Street to Main Street	62.9	61.9	1.0	MFR/Lt Industrial/Commercial
	Main Street to Harvard Boulevard	65.5	64.8	0.7	MFR/Commercial
	Harvard Boulevard to SR-126 WB Ramps	67.9	66.9	1.0	Commercial
	SR-126 WB Ramps to SR-126 EB Ramps	65.5	64.5	1.0	ROW
	SR-126 EB Ramps to Santa Maria Street	53.7	52.0	1.7	
	SR-126 EB Ramps to southern terminus	53.7	52.0	1.7	
6th Street	Virginia Terrace to Santa Barbara Street	59.0	58.0	1.0	
8th Street	Virginia Terrace to Main Street	61.6	60.3	1.3	SFR
	Main Street to Harvard Boulevard	61.6	59.5	2.1	MFR
	Harvard Boulevard to Santa Maria Street	57.2	56.2	1.0	
10th Street / SR-150	Northern terminus to Santa Paula Street	58.0	56.8	1.2	
	Santa Paula Street to Santa Barbara Street	65.5	64.3	1.2	MU-Office/Residential
	Santa Barbara Street to Main Street	65.1	63.9	1.1	Commercial Office
	Main Street to East Ventura Street	65.5	64.3	1.1	CO/Com/Inst
	East Ventura Street to Harvard Boulevard	65.4	64.3	1.1	Com/Inst



Roadway	Segment	Projected (2040)	Existing (2016)	Increase	Adjacent Land Use
	Harvard Boulevard to SR-126 WB Ramps	65.0	64.2	0.8	ROW
	SR-126 WB Ramps to SR-126 EB Ramps	62.2	61.4	0.8	ROW
	SR-126 EB Ramps to Santa Maria Street	62.2	61.4	0.8	ROW
Ojai Road / SR-150	Northern City Limits to Virginia Terrace	65.7	64.8	0.9	SFR
	Virginia Terrace and Santa Paula Street	66.1	65.2	0.9	MFR
12th Street	Richmond Road to Main Street	63.2	62.1	1.1	MFR
	Main Street to Harvard Boulevard	61.2	60.0	1.2	MFR
S. Mountain Road	Harvard Boulevard to southern terminus	61.6	60.2	1.4	Ag/OS
Hallock Drive	Telegraph Road to SR-126	68.9	63.0	5.9	C/LI
	SR-126 to Old Hallock Drive	65.6	59.3	6.2	C/LI
Foothill Road	Briggs Road to Peck Road	61.2	61.1	0.1	Ag (Unincorporated)
	Peck Road to Ridgecrest Drive	49.3	49.0	0.3	
Virginia Terrace	Western terminus to Ojai Road	56.1	55.2	0.9	
Santa Paula Street	Cummings Road to Peck Road	58.4	57.2	1.3	
	Peck Road to Palm Avenue	63.1	61.9	1.2	SFR
	Palm Avenue to 10th Street	61.4	59.8	1.6	SFR
	10th Street to eastern terminus	61.1	54.9	6.1	SFR
Santa Barbara Street	Peck Road to dead end	50.8	50.2	0.6	
	End to Palm Avenue	56.9	56.6	0.3	
	Palm Avenue to 10 th Street	59.3	58.4	0.9	
	10 th Street to 12 th Street	57.6	56.6	1.0	
Telegraph Road	Cummings Road to Briggs Road	64.2	63.9	0.2	Ag (Unincorporated)
	Briggs Road to 950 ft. west of Beckwith Street	64.7	64.5	0.2	Ag (Unincorporated)
	950 ft. west of Beckwith Street to Peck Road	65.9	64.6	1.4	SFR/MFR
	Main Street to 850 ft. east of Main Street	64.3	61.4	2.8	C/LI OS
	850 ft. east of Main Street to Hallock Drive	69.0	65.0	4.1	C/LI
	Hallock Drive to eastern terminus	59.6	59.0	0.5	
Main Street	Peck Road to 1,500 ft. west of Steckel Drive	60.8	59.6	1.2	SFR
	1,500 ft. west of Steckel Drive to Steckel Drive	62.1	61.1	1.0	Com/Inst/OS
	Steckel Drive to Palm Avenue	62.1	61.1	1.0	MFR
	Palm Avenue to 8 th Street	63.3	62.3	1.0	Com/OS
	8 th Street to 10 th Street	63.0	60.8	2.3	CO
	10 th Street to 12 th Street	60.6	59.0	1.7	CO/Com
	12 th Street to Harvard Boulevard	61.7	61.1	0.6	C/LI
Harvard Boulevard	Peck Road to Steckel Drive	67.2	66.4	0.8	SFR
	Steckel Drive to Palm Avenue	68.1	67.1	1.0	SFR



Roadway	Segment	Projected (2040)	Existing (2016)	Increase	Adjacent Land Use
	Palm Avenue to 8th Street	65.8	64.7	1.1	MFR/Inst (school)
	8 th Street to 10 th Street	65.5	64.3	1.2	Com
	10 th Street to 12 th Street	63.2	62.8	0.5	MFR
	12 th Street to 440 ft. west of Main Street	59.3	58.9	0.4	
	440 ft. west of Main Street to Main Street	58.9	58.5	0.4	
Faulkner Road	End to SR-126 WB Ramps	55.3	54.1	1.2	
	SR-126 WB Ramps to Peck Road	62.8	61.4	1.4	SFR
Santa Maria Street	Acacia Road to Palm Avenue	60.7	59.8	1.0	SFR
	Palm Avenue to Dead End	59.8	58.8	1.0	

Sources: Giroux & Associates, 2018; City of Santa Paula

Note: Adjacent land use is not identified where the projected 2040 noise level is less than 60 dB.



The level of significance for exterior noise generated by traffic is determined through a comparison of noise levels and the type of adjacent land use. Based upon the Noise/Land Use Compatibility Matrix (**Exhibit 4.13-3**), the proposed 2040 Land Use Plan (**Exhibit 3.4-1**) and the estimated noise levels shown in **Table 4.13-5**, there are 23 road segments where the projected 2040 noise level would exceed the “normally acceptable” level for the type of adjacent land use (shaded rows). In all but four of these segments the projected increase in noise level expected to occur by 2040 is less than 3 dB CNEL, which is typically not perceptible. However, because noise would exceed the level considered “normally acceptable” this is considered a potentially significant impact for purposes of General Plan analysis.

In three of the 23 road segments where the 2040 noise level is projected to exceed adopted standards the projected increase is greater than 5 dB CNEL. Although an increase of 5 dB would be perceptible to most people, this change would occur over a long period of time. However, because noise would exceed the level considered “normally acceptable” this is considered a potentially significant impact for purposes of General Plan analysis. In addition, one segment (Peck Road from the SR-126 eastbound ramps to its southern terminus) has a projected noise increase of greater than 5 dB CNEL. Although the projected 2040 noise level would not exceed standards and the increase would occur over a long period of time, this is also considered a potentially significant impact because a 5 dB increase would be perceptible to most people.

The 2040 General Plan includes policies and programs (**Table 4.13-5**) requiring new noise-sensitive uses located in areas where noise levels exceed “normally acceptable” levels to demonstrate that they have incorporated design features to reduce interior noise to acceptable levels. While these requirements would reduce potential noise impacts for new developments to a level that is less than significant, existing noise-sensitive uses may continue to be impacted by noise levels that exceed current standards. Over time, these uses may be remodeled or replaced with new structures incorporating noise mitigation. However, the continuing exposure of existing uses to noise levels that exceed current standards is considered to be a significant impact with no feasible mitigation available in the near term.

Railroad Noise

Use of the rail line through Santa Paula is currently limited. The Fillmore & Western Railroad currently operates tourist excursion trains between Fillmore and Santa Paula on weekends. The railroad is also used by the Weyerhaeuser plant and local agricultural operations in Santa Paula and occasionally by Hollywood film productions that use Santa Paula as a backdrop. Because of the infrequent nature operations, noise



impacts from rail operations are considered less than significant. In addition, 2040 General Plan Program HPS 6.h shown in **Table 4.13-5** above would help to reduce impacts from rail noise. If a substantial increase in rail operations were proposed in the future, additional CEQA analysis would be required.

Commercial and Industrial Noise

Commercial operations located in areas near Laurie Lane, Steckel Drive, Harvard and Palm Streets, Main and 7th Streets, and in the Downtown, may produce noise that affects nearby sensitive land uses such as homes and schools. However, noise due to commercial uses has generally not been a significant issue in the community.

Industrial development is located along Telegraph Road, Peck Road, Main Street and south of the SR-126 freeway adjacent to the airport. Noise generated by plant operations and heavy equipment could impact nearby residential areas, parks, schools, and a mental care facility.

The City's Noise Ordinance (Title IX, Chapter 93 of the Santa Paula Municipal Code) regulates against loud or unnecessary noise and defines sources of such noise. Section 93.21 establishes maximum allowable sound levels for different land use categories as shown in **Table 4.13-3**. In addition, Policy HPS 6.3 and Programs HPS 6.e and 6.f (see **Table 4.13-5**) would reduce noise impacts from new commercial and industrial developments by requiring analysis of potential noise impacts and appropriate mitigation. Required conformance with the Noise Ordinance together with proposed General Plan policies and programs would reduce potential noise impacts from commercial and industrial operations to a level that is less than significant.

Agricultural Noise

Noise from tractors and other agricultural equipment such as frost control devices are the most common sources of agricultural noise. Many of these noise sources lie outside the city and are related to seasonal operations. Packing operations, including refrigeration trucks, and movement of farm equipment are sources of noise that have the potential to affect the city, but are not a constant source of noise. Farm equipment movement usually occurs on Santa Paula Street and Harvard Boulevard during busy agricultural times of the year. Program HPS 6.i in the 2040 General Plan would address potential noise impacts through cooperation with agricultural property owners to address any identified noise problems and reduce impacts to a level that is less than significant.



Table 4.13-6 General Plan Policies and Programs Related to Long-Term Noise and Vibration

Policies	Programs
<p>HPS 6.1 Noise standards. The maximum acceptable ambient noise levels for usable outdoor areas shall be as provided in the Noise/Land Use Compatibility Matrix (Figure 5-8). The maximum acceptable interior noise level shall be as provided by the Municipal Code.</p> <p>HPS 6.2 Noise/land use compatibility. Land use decisions shall consider the Noise/Land Use Compatibility Matrix. Unless a proposed use is identified as <i>Normally Acceptable</i>, the use shall not be approved unless a noise study has been prepared demonstrating that noise levels will not exceed adopted standards. When a building's openings to the exterior are required to be closed to meet the interior noise standard, mechanical ventilation shall be provided.</p> <p>HPS 6.3 New noise-generating uses. New commercial, industrial, or other noise-generating developments must not cause significant noise impacts on noise-sensitive uses. Techniques for reducing noise impacts may include locating truck access and parking areas away from sensitive uses, limiting truck traffic during night and early morning hours, placement of walls or structures to buffer noise, and limiting the use and location of noise-generating equipment such as leaf blowers and maintenance equipment.</p> <p>HPS 6.4 Existing noise and ground-borne vibration. Exposure of citizens to excessive noise and ground-borne vibration, including nuisance noise, should be reduced to the greatest extent feasible.</p>	<p>HPS 6.a Noise along state highways. Work with Caltrans to mitigate traffic noise impacts on sensitive uses adjacent to state highways. Requirements that are within the City's jurisdiction shall be included in the City's Noise Ordinance. Strategies to be considered include:</p> <ul style="list-style-type: none"> - Limitations on hours of operation and other truck operations that could be limited to reduce noise impacts. - Encourage the use of designated truck routes in accordance with the Circulation and Mobility Element that avoid residential areas and confine truck traffic to major thoroughfares. - Prohibit the use of "jake brakes" along established truck routes adjacent to sensitive uses. <p>HPS 6.b Noise along local streets. Minimize vehicular noise on pedestrians and residential neighborhoods by inhibiting through trips by the use of diagonal parking, one-way streets, road dips, speed humps, and other traffic calming controls. If feasible, rubberized asphalt paving material shall be required for all new roads.</p> <p>HPS 6.c City vehicles. Ensure that new vehicles and other equipment purchased by the City comply with the best available noise-reduction technology.</p> <p>HPS 6.d Noise Ordinance. Review and update the Noise Ordinance (SPMC Chapter 93) on a regular basis to reflect changes in state or federal law and City policy.</p> <p>HPS 6.e Project design standards. Adopt and enforce design standards in the Development Code to reduce noise effects on-site and on adjacent noise-sensitive uses. Techniques may include the location of driveways and parking areas, enclosure of parking structures facing noise-sensitive uses, use of landscape buffers or sound walls, use of sound absorbing materials to minimize sound amplification and transmission, limiting hours of operation, and other appropriate techniques.</p> <p>HPS 6.f Development review. As part of the development review process, assist applicants in demonstrating that interior and exterior noise levels for the proposed land uses will be in conformance with the Land Use/Noise Compatibility Matrix and the Noise Ordinance. Unless a proposed development is within the <i>Normally Acceptable</i> noise contour, the applicant shall provide a site-specific noise study prepared by a qualified acoustical engineer demonstrating conformance with applicable interior and exterior noise standards. The determination of whether a project site is within the <i>Normally Acceptable</i> range shall be made by the Planning Department.</p> <p>When a proposed development would result in noise levels requiring mitigation, preference for mitigation measures shall be in the following order:</p> <ol style="list-style-type: none"> 1. Site layout, including setbacks, open space separation and shielding of noise sensitive uses with non-noise-sensitive uses. 2. Acoustical treatment of buildings.



Policies	Programs
	<p>3. Structural measures: construction of earthen berms or wood or concrete barriers.</p> <p>For mixed-use projects, applicants shall demonstrate that noise levels for sensitive uses within the development will not exceed adopted interior and exterior standards.</p> <p>As part of the development review process, the City shall require all feasible methods of minimizing construction noise.</p> <p>HPS 6.g Santa Paula Airport. Work cooperatively with Santa Paula Airport officials to resolve operational noise concerns, including those resulting from aerobatics and air shows.</p> <p>HPS 6.h Rail noise. Encourage railroad operators and the Ventura County Transportation Commission to properly maintain lines and establish operational restrictions during the early morning and late evening hours and/or install noise mitigation features to reduce impacts in residential neighborhoods and other noise sensitive areas.</p> <p>HPS 6.i Agricultural noise. Work with agricultural property owners in and around the city to address any identified noise problems relating to the use of farm equipment, such as frost protection equipment and farm machinery on city streets.</p>

Nuisance Noise

Nuisance noise in residential areas includes sources such as air conditioners, gardening equipment, power tools, generators, amplified music and barking dogs. The effects of nuisance noise can be compounded by the time of day, volume, and proximity to sensitive receptors. For instance, a loud party might be acceptable in the early evening hours but be considered a nuisance during late night and early morning hours. The City's Noise Ordinance (SPMC Chapter 93) contains regulations limiting the allowable noise generated by equipment, private parties, and animal noise. Required compliance with these regulations would reduce potential impacts to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to long-term noise levels.¹³⁸ Although the proposed policies and programs would reduce the noise effects of implementation of the 2040 General Plan, incremental effects related to traffic noise would remain cumulatively considerable. Proposed General Plan policies and programs would reduce the incremental effects of other noise sources to a level that is less than cumulatively considerable.

138 SCAG 2016-2040 RTP/SCS PEIR, p. 3.13-39



Level of Significance

Traffic noise: Potentially significant

Other noise sources: Less than significant

Mitigation Measures

Traffic noise: All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs

Other noise sources: None required

Level of Significance after Mitigation

Traffic noise: Significant impact

Other noise sources: Less than significant

Impact N-3: Generation of excessive groundborne vibration or noise

Impact Discussion

Project Impacts. As with air-borne noise, ground-borne vibration or noise can result from construction activities or ongoing operations. The City has not adopted a quantitative significance threshold to assess vibration impacts, although Development Code §16.27.050(E) provides that “No operation is permitted that emits ground vibrations perceptible without instruments beyond the property lines of the parcel of origin” within Airport zones.

Sensitive receptors for vibration are the same as for noise, with one exception that is particularly relevant for Santa Paula. Historic structures can be particularly sensitive to damage from excessive vibration because they tend to be more fragile than modern construction.¹³⁹

The Federal Transit Administration (FTA) has published guidelines for how people respond to ground-borne vibration (**Table 4.13-7**).

¹³⁹ National Cooperative Highway Research Program. Current Practices to Address Construction Vibration and Potential Effects to Historic Buildings Adjacent to Transportation Projects. Table 1. September 2012.



Table 4.13-7 Human Response to Different Levels of Ground-Borne Vibration and Noise

Vibration Velocity Level	Noise Level		Human Response
	Low Freq*	Mid Freq**	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound: usually inaudible. Mid-frequency sound: excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise: tolerable for sleeping areas. Mid-frequency noise: excessive in most quiet occupied areas.
85 VdB	45 dBA	60 dBA	Vibration tolerable only if there are an infrequent number of events per day. Low-frequency noise: excessive for sleeping areas. Mid-frequency noise: excessive even for infrequent events for some activities.

*Approximate noise level when vibration spectrum peak is near 30 Hz.

**Approximate noise level when vibration spectrum peak is near 60 Hz.

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 5-5, (https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf)

FTA utilizes the following indoor ground-borne vibration thresholds for frequent events (i.e., more than 70 per day):

- Category I: 65 VdB for buildings where low ambient vibration is essential for interior operations
- Category II: 72 VdB for residences and buildings where people normally sleep
- Category III: 75 VdB for institutional land uses with primary daytime use

Construction of new developments anticipated by the 2040 General Plan could generate ground-borne vibration and noise on and adjacent to construction sites. Effects on buildings in the vicinity of a construction site can range from imperceptible effects at the lowest levels, to low rumbling sounds and perceptible vibrations at minor levels, and structural damage at very high vibration levels. Historic buildings are more susceptible to damage from vibration, and some types of construction equipment, such as pile drivers, have the potential to cause substantial disturbance or physical damage to nearby uses.

Long-term activities, such as heavy truck or rail traffic and some kinds of industrial operations, can also generate ground-borne vibration of varying degrees.

The 2040 General Plan includes policies and programs (**Table 4.13-4** and **Table 4.13-5**) intended to reduce the effects of noise and vibration. In most cases, these policies and programs would reduce potential impacts to a level that is less than significant. However, it is possible that some types of activities such as construction requiring the use of pile drivers



or compactors, particularly near historic buildings, could result in significant impacts even with adherence to these policies and programs.

Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to ground-borne vibration would be significant and unavoidable.¹⁴⁰ Although the proposed policies and programs would reduce the effects of implementation of the 2040 General Plan, incremental effects related to ground-borne vibration would remain cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measure:

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs

Level of Significance after Mitigation

Significant impact

Impact N-4: Aviation noise

Impact Discussion

Project Impacts. As discussed above in the Existing Noise Conditions section, there are no proposed land use designations in the 2040 General Plan that would conflict with the Noise/Land Use Compatibility Matrix (**Exhibit 4.13-3**) with respect to aviation noise. However, some existing non-conforming residential properties are located near the airport where current noise levels may be unacceptable. Over time, it is anticipated that this conflict will be eliminated as those non-conforming uses are replaced by less noise-sensitive industrial uses consistent with the 2040 Land Use Plan.

According to the *Airport Comprehensive Land Use Plan*, no changes to operational characteristics are anticipated at Santa Paula Airport that would increase noise impacts in the vicinity of the airport.¹⁴¹ During occasional events such as air shows, noise levels may be expected to be higher than usual due to an increase in aircraft operations. Program HPS 6.g in the 2040 General Plan includes a commitment for the City to work cooperatively with Santa Paula Airport officials to resolve operational noise concerns, including those resulting

¹⁴⁰ SCAG 2016-2040 RTP/SCS PEIR, p. 3.13-39

¹⁴¹ Ventura County Airport Land Use Commission, *Airport Comprehensive Land Use Plan for Ventura County*, 2000, p. C-2



from aerobatics and air shows. Implementation of this program, together with the infrequent nature of these events, would reduce potential impacts to a level that is less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to aircraft noise would be less than significant.¹⁴² The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to *CEQA Guidelines* §15130(d).

Level of Significance

Less than significant

Mitigation Measure

None required

Level of Significance after Mitigation

Less than significant

¹⁴² SCAG 2016-2040 RTP/SCS PEIR, p. 3.13-35 as revised on p. 9-88 of the Final PEIR Clarifications and Revisions



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4.14 Population and Housing

4.14-1 Setting

Existing Physical Conditions

Santa Paula is one of Ventura County's smaller communities, with an estimated population of 31,138 and 9,004 housing units in 2018. During the period 2000-2018, Santa Paula's population grew by about 8.9% compared to 14.1% for Ventura County as a whole (**Table 4.14-1**). As of 2018, Santa Paula represented about 3.6% of Ventura County's total population.

Table 4.14-1 Population and Housing Trends 2000-2018, Santa Paula and Ventura County

Jurisdiction	Population			Housing Units		
	2000	2010	2018	2000	2010	2018
Santa Paula	28,598	29,321	31,138	8,341	8,749	9,004
Ventura County	753,197	823,318	859,073	251,711	281,695	288,579

Source: U.S. Census Bureau; California Department of Finance, 2018

Regulatory Framework

Federal Policies and Regulations

There are no federal regulations directly related to this topic.

State and Regional Policies and Regulations

Regional Housing Needs. *California Government Code* §65580, et seq. requires the preparation of a Housing Element as part of each jurisdiction's General Plan. Santa Paula adopted its last Housing Element update for the 2013–2021 planning period, and no changes to the Housing Element are proposed as part of the 2040 General Plan update. The next Housing Element update is anticipated in 2021.

Santa Paula's assigned share of regional housing needs during the 2013-2021 planning period is shown in **Table 4.14-2**.

Table 4.14-2 2013-2021 Regional Housing Needs Assessment - Santa Paula

Income Category	Housing Units
Very low	288
Low	201
Moderate	241
Above moderate	555
Total	1,285

Source: SCAG, 2012



Among the key provisions of state housing element law is the requirement that each jurisdiction demonstrate that it has adequate sites with appropriate zoning to accommodate its assigned share of the region's housing need for all economic segments of the community. The Regional Housing Needs Assessment ("RHNA") identifies Santa Paula's share of the regional housing need for the 2013-2021 planning period as 1,285 units. This total includes 288 very-low income units, 201 low-income units, 241 moderate-income units, and 555 above-moderate units. State law requires the City to demonstrate that adequate sites are available to accommodate the various types of housing units that have been assigned in the RHNA. It is important to note that State law does not require cities to construct or fund housing, or issue building permits commensurate with regional housing needs; rather, State law focuses on ensuring that cities adopt appropriate zoning and development regulations that provide realistic opportunities for housing to be built commensurate with the RHNA allocation.

Regional Growth Forecast. As part of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) the Southern California Association of Governments (SCAG) adopted a long-range growth forecast for each jurisdiction and county in the region. SCAG's 2040 growth forecast for Santa Paula and Ventura County is shown in **Table 4.14-3**. During the 2012-2040 forecast period Santa Paula's population is expected to increase by approximately 9,800 persons and 3,000 households. While SCAG's forecast does not include housing units, it may be assumed that more than 3,000 new housing *units* would be needed to accommodate 3,000 additional *households* due to vacancies and existing housing units that may be demolished or converted to other uses.

Table 4.14-3 SCAG 2040 Population and Housing Forecast, Santa Paula and Ventura County

Jurisdiction	Population			Households		
	2012	2040	Growth	2012	2040	Growth
Santa Paula	29,800	39,600	9,800	8,500	11,500	3,000
Ventura County	835,400	965,400	130,000	269,400	312,300	42,900

Source: SCAG, 2016

Local Policies and Regulations

City of Santa Paula Development Code – Title XVI of the Municipal Code contains specific regulations that apply to existing uses and future development projects. Where relevant, specific development regulations are discussed in each of the topical sections. Chapter 16.110 of the Code establishes regulations regarding nonconforming uses.



4.14-2 Thresholds of Significance

Thresholds of significance criteria relative to population and housing are based upon the CEQA Guidelines. The proposed General Plan would be deemed to have a significant impact on population and housing if it were to:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) (Impact PH-1)
- b) Displace substantial numbers of existing people or houses, necessitating the construction of replacement housing elsewhere (Impact PH-2)

4.14-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to population and housing expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact PH-1: Induce substantial unplanned population growth

Impact Discussion

Project Impacts. As noted in the above discussion of population and housing trends and regulatory policies, both State housing law and the regional growth forecast call for continued population and housing growth in Santa Paula. The 2012 Regional Housing Needs Assessment (RHNA) requires the City to adopt land use plans and regulations to accommodate at least 1,285 additional housing units during the 2014-2021 planning period. SCAG's 2016-2040 RTP/SCS anticipates an increase of 9,800 residents and 3,000 households in Santa Paula between 2012 and 2040. The estimated development potential of the proposed General Plan is consistent with both State and regional growth policies. Therefore, while the 2040 General Plan would induce substantial population growth, the level of growth would be consistent with State and regional planning policy; therefore, this planned growth is considered to be a less than significant impact.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to population growth.¹⁴³ The proposed Plan

¹⁴³ SCAG 2016-2040 RTP/SCS PEIR, p. 3.14-27



is consistent with RTP/SCS population growth assumptions, and the proposed policies and programs would reduce the incremental effects of implementation of the 2040 General Plan on population growth to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

Impact PH-2: Displacement of substantial numbers of people or houses

Impact Discussion

Project Impacts. As summarized in the Project Description (**Table 3.4-3** on page [3-11](#)), the proposed 2040 General Plan Land Use Map (**Exhibit 3.4-1**) would change the current land use designations for some properties. Most of the revisions involving residential designations would change a commercial or mixed-use designation to a residential designation. However, two proposed revisions (41-42 Palm Court and 255 N. Ojai Street) would change a residential designation to a non-residential designation. The Palm Court properties previously contained three single-family houses, which have been demolished. This property is owned by Santa Paula Unified School District and is now used for school parking. Therefore, no displacement of people or housing would result from this proposed land use change. The Ojai Street property contains one legal nonconforming single-family house. The proposed 2040 General Plan would redesignate this property to Mixed Use: Commercial-Light Industrial, which would allow residential use; therefore, no displacement of people or housing would occur as a result of this proposed change.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to displacement of housing or people.¹⁴⁴ The proposed Plan is consistent with RTP/SCS population growth assumptions, and the proposed policies and programs would reduce the incremental effects of implementation of the 2040 General Plan on the displacement of people or housing to a level that is less than cumulatively considerable.

¹⁴⁴ SCAG 2016-2040 RTP/SCS PEIR, p. 3.14-27



Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

4. Environmental Setting and Impact Analysis
4.14 – Population and Housing



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4.15 Public Services

This section of the EIR discusses potential impacts related to fire protection, police protection, schools and libraries. The issues of emergency response and wildland fire hazards are addressed in **Section 4.9 – Hazards and Hazardous Materials**. Analysis of parks and recreation facilities is addressed in **Section 4.16 - Recreation**.

4.15-1 Setting

Existing Physical Conditions

Fire Protection

[Note: CEQA Guidelines §15125 and §15126.2 establish that the baseline for analysis is normally the conditions that existed at the time the EIR Notice of Preparation (NOP) was published. However, in its 2013 decision Smart Rail v. Exposition Metro Line Construction Authority the California Supreme Court determined that a later baseline may be appropriate if analysis based upon the NOP date would be "misleading or without informational value to EIR users." At the time the General Plan NOP was published (November 2017) fire protection in Santa Paula was provided by the Santa Paula Fire Department. In April 2018 Santa Paula was annexed into the Ventura County Fire Department. Therefore, the City has determined that analysis of fire protection issues will be most informative and relevant to the public and decision-makers if it is based upon conditions after Santa Paula's annexation into the VCFD.]

The Santa Paula Fire Department began operations in 1903 and provided fire protection in the city until April 2018 when Santa Paula was annexed into the Ventura County Fire Department.

Two fire stations currently serve Santa Paula (**Exhibit 4.15-1**). Fire Station 29, which primarily serves the eastern portion of the city, is located at 114 S. 10th Street. Fire Station 26, which primarily serves the western portion of the city, is located at 536 W. Main Street. Each fire station houses one engine company, which is on duty around the clock. Engine companies are dispatched to all fires, rescues, 911 medical calls, and other emergencies within the city.

The 2018 annexation Memorandum of Agreement between the City and VCFD describes services to be provided and funding levels. In addition to Santa Paula, VCFD provides fire protection services in Camarillo, Moorpark, Ojai, Port Hueneme, Simi Valley, Thousand Oaks and unincorporated Ventura County.

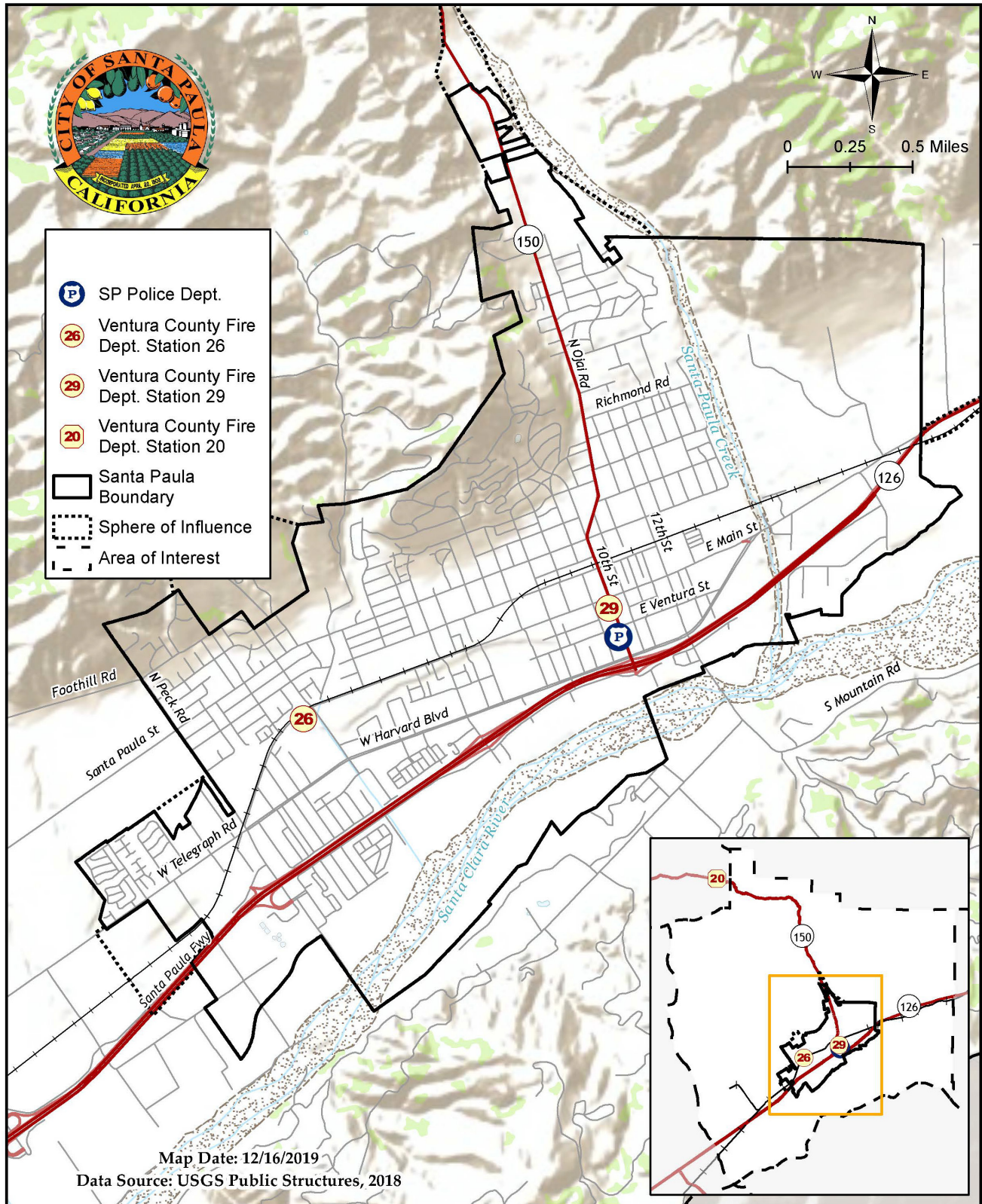


Exhibit 4.15-1 Police and Fire Facilities



The Plan for Service approved by LAFCo as part of the VCFD annexation process includes the following services to be provided in Santa Paula:

- Fire suppression
- Emergency medical response
- Hazardous materials response
- Search and rescue
- Mass casualty and major disaster response
- Arson investigation
- Pre-development plan review
- Inspection services
- Fire Code administration
- Wildland-Urban Interface fire hazard reduction
- Dispatch/communications

Upon annexation by VCFD, Santa Paula Fire Station 81 became VCFD Station 29 and Santa Paula Fire Station 82 became VCFD Station 26. These two stations are proposed to be rebuilt by VCFD in the future to incorporate state-of-the-art capabilities.

When the East Area 1 project was originally approved, it was anticipated that a new fire station would be built within the development. However, with annexation of Santa Paula into the VCFD, adequate fire and emergency medical services coverage is provided for the entire city and construction of a new fire station in East Area 1 is no longer required.

Police

The Santa Paula Police Department has been responsible for the security of Santa Paula residents and businesses since 1923. The Department provides a broad range of law enforcement services, including administration, patrol, investigations, dispatch, records services, and custody/jail services. The Department also oversees animal control and graffiti removal. The Police Department has a mutual aid agreement with Ventura County.

The City operates one main police station located at 214 South 10th Street (**Exhibit 4.15-1**), and a future police substation site has also been identified in the East Area 1 Specific Plan.

The City's desired standard is to provide 1.25 sworn police officers per 1,000 residents, or 1 officer per 800 residents. As of 2017 the ratio was 1.02 officers per 1,000 residents (30 sworn officers). To achieve the City's desired level of service standard, 38 sworn officers would be required to serve the 2017 estimated population of 30,654 while a total of 50 sworn officers would be required to serve the city's projected 2040 population of 39,600.



Schools

Santa Paula is currently served by four school districts: Santa Paula Unified School District,¹⁴⁵ Mupu Elementary School District,¹⁴⁶ Briggs Elementary School District,¹⁴⁷ and Santa Clara Elementary School District.¹⁴⁸ The boundaries of the Mupu, Briggs, and Santa Clara districts extend beyond the City limits into unincorporated territory. In 2013, the former Santa Paula Elementary School District and the Santa Paula Union High School District merged to form the Santa Paula Unified School District (SPUSD). SPUSD operates an early childhood education program, six K-5 elementary schools, one 6-8 middle school, one comprehensive high school, and one continuation high school.

Existing school facilities within Santa Paula are shown in **Exhibit 4.15-2**. Estimated 2016 enrollment for each school is shown in **Table 4.15-1**.

Table 4.15-1 Public Schools Serving Santa Paula

District	School	Grade Level	Estimated Enrollment
Santa Paula Unified	Barbara Webster	K-5	413
Santa Paula Unified	Blanchard Elementary	K-5	445
Santa Paula Unified	Glen City Elementary	K-5	613
Santa Paula Unified	Grace S. Thille Elementary	K-5	426
Santa Paula Unified	Isbell Middle	6-8	1,231
Santa Paula Unified	McKevett Elementary	6-8	384
Santa Paula Unified	Renaissance High	11-12	122
Santa Paula Unified	Santa Paula High	9-12	1,588
Santa Paula Unified	Thelma B. Bedell Elementary	K-5	330
Mupu	Mupu Elementary	K-8	154
Briggs	Briggs Elementary	5-8	285
Briggs	Olivelands Elem.	K-4	266
Santa Clara	Santa Clara Elem.	K-5	56

Source: California Department of Education 2016-2017 School Activity Report Card (SARC) for 2015-2016 Activity.

Two private schools are located in Santa Paula: St. Michael's Academy in the Mountains, and St. Sebastian. Additional educational facilities include Thomas Aquinas College, Santa Paula Adult School, and Ventura College-Santa Paula.

- Thomas Aquinas College is a private liberal arts college located in the unincorporated area north of the city. It was founded in 1971 and had an enrollment of 378 students in 2017.¹⁴⁹

¹⁴⁵ <http://www.santapaulaunified.org/>

¹⁴⁶ <http://www.mupu.k12.ca.us/>

¹⁴⁷ <http://www.briggsesd.org/>

¹⁴⁸ <http://www.scesd.k12.ca.us/>

¹⁴⁹ <https://thomasaquinas.edu/about/fact-sheet>



- Santa Paula Adult School is part of the California Adult School System, which provides adult basic skills leading to high school diplomas and general education degrees and job training for career advancement.¹⁵⁰ Santa Paula Adult School is located at 404 N. Sixth Street in the central portion the city.
- Ventura College-Santa Paula (East Campus) is an extension of Ventura College, an accredited 2-year institution of higher education. The Santa Paula campus offers a variety of educational programs, including a rotation of general education transfer courses, career and technical training, and basic skills and English as a Second Language. In 1980, the Santa Paula Vocational Center, later known as East Campus, opened on Dean Drive in Santa Paula. In 2011, the satellite campus, now referred to as the Ventura College-Santa Paula Site, moved to its current location on Faulkner Road.¹⁵¹

The East Area 1 Specific Plan identifies a site for a K-8 school centrally located in the Specific Plan area. The Specific Plan also designates land in the Civic District for additional high school facilities. The high school site adjoins planned public athletic fields.

Under California law, public school districts are independent of city governments; however, cooperation between school districts and cities is required in many situations such as planning, design and construction of new schools, school facilities and major additions to existing school facilities, and recreation and park facilities in the community.

Libraries

Santa Paula has one public library, the Blanchard Community Library, which opened in 1910 and is located at 119 North 8th Street (**Exhibit 4.15-2**). The 22,000-square-foot facility is managed by a director, employs two librarians and a Literacy Services Coordinator, and has 10 to 12 other staff members (primarily part-time employees). In addition, up to 100 library volunteers work in one of three groups: Friends of the Library; literary tutors; and operational aides. The library is an independent California Special District created by the community to serve a specific need and is funded primarily from Santa Paula property taxes including a property tax special assessment. The Special District has a territory covering approximately 107 square miles, which includes unincorporated areas outside of the boundaries of the City of Santa Paula.¹⁵²

In addition to reference and lending services, the library offers filtered internet access for students and the general public, as well as a variety of programs including Adult Coloring Club, Story Time, Teen Scene and Family Night.

¹⁵⁰ <http://www.cde.ca.gov/schooldirectory/details?cdscode=56768285630140>

¹⁵¹ <http://www.venturacollege.edu/departments/administrative/ventura-college-santa-paula-and-off-campus-programs-east-campus>

¹⁵² Ned Branch, Blanchard Library Director, 5/2/2017

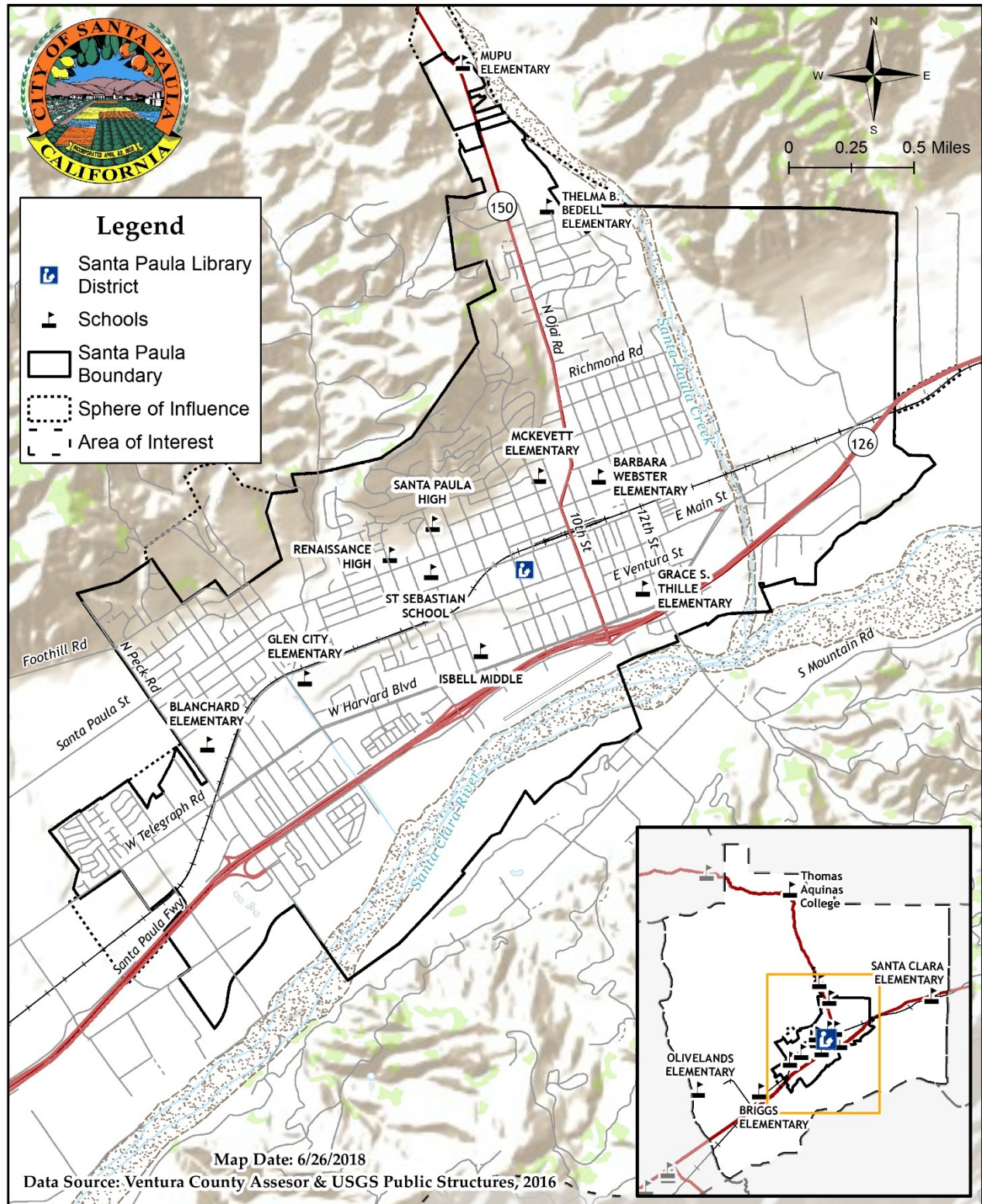


Exhibit 4.15-2 Public Schools and Libraries



Regulatory Framework

Fire Protection

General Plan Law. Section 65302(a) of the *California Government Code* specifically lists public buildings and grounds as a land use that must be planned for in the Land Use Element of the General Plan. This includes the provision of adequate sites for fire protection facilities.

East Area 1 Specific Plan. The East Area 1 Specific Plan identifies a site for a new public safety facility that could include a fire station and police substation to serve the Specific Plan area.

Santa Paula Municipal Code. Chapter 150 of the Municipal Code contains City standards and building regulations related to fire protection consistent with state law.

Police Protection

General Plan Law. Section 65302(a) of the *California Government Code* specifically lists public buildings and grounds as a land use that must be planned for in the Land Use Element of the General Plan. This includes the provision of adequate sites for law enforcement facilities.

East Area 1 Specific Plan. The East Area 1 Specific Plan identifies a site for a new public safety facility that could include a fire station and police substation to serve the Specific Plan area.

Schools

General Plan Law. *California Government Code* §65302(a) lists education as a land use that must be addressed in the Land Use Element of the General Plan. Before adopting a general plan, a local government must solicit input from affected school districts.¹⁵³

School districts must also notify the city or county planning agency at least 45 days prior to completion of a school facility needs analysis, master plan, or other long-range plan, that relates to the potential expansion of existing school sites or the necessity to acquire additional school sites. School districts must also provide copies of any relevant and available information, such as master plans, other long-range plans, and school facility needs analyses, to the planning commission or agency of the city or county with land use jurisdiction within the school district.¹⁵⁴

Although school districts are required to comply with city/county zoning ordinances if the city or county has an adopted general plan and the ordinances make provision for the location of public schools, school district governing boards that have complied with

¹⁵³ *California Government Code* §65352(a)(2)

¹⁵⁴ *California Government Code* §65352.2



notification requirements may, by a two-thirds vote, render a local zoning ordinance inapplicable to a proposed use of property by the school districts for classroom facilities.¹⁵⁵ However, this provision does not apply for non-classroom facilities (e.g., private development of a surplus school site).

Before the acquisition of property for facilities, school districts must consult with the planning agency of the local government.¹⁵⁶

CEQA. Before acquiring title to property for a new school site or for an addition to a present school site, a school district must give the planning commission having jurisdiction notice in writing of the proposed acquisition. The planning commission must investigate the proposed site and within 30 days after receipt of the notice submit a written report of the investigation and its recommendations concerning acquisition of the site to the school district governing board.¹⁵⁷

Education Code. School districts must meet with appropriate local government recreation and park authorities to review all possible methods of coordinating planning, design and construction of new schools, school facilities and major additions to existing school facilities and recreation and park facilities in the community.¹⁵⁸

East Area 1 Specific Plan. The East Area 1 Specific Plan identifies an approximately 10.9-acre site for a K-8 school centrally located in the Specific Plan area. The Specific Plan also designates approximately 8.3 acres of land in the Civic District for additional high school facilities. The high school site adjoins approximately 37.8 acres of planned public athletic fields.

Libraries

General Plan Law. Section 65302(a) of the *California Government Code* specifically lists educational facilities and public buildings and grounds as land uses that must be planned for in the Land Use Element of the General Plan. This would include the provision of adequate sites for public library facilities.

¹⁵⁵ *California Government Code* §53094

¹⁵⁶ *California Government Code* §65402

¹⁵⁷ *California Public Resources Code* §21151.2

¹⁵⁸ *California Education Code* §35275



4.15-2 Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have significant impact on public services if it were to:

Result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

- a) Fire protection (Impact PS-1)
- b) Police protection (Impact PS-2)
- c) Schools (Impact PS-3)
- d) Parks (See Impact REC-1 in **Section 4.16-2**)
- e) Other public facilities (Impacts PS-4 and PS-5)

4.15-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to public services expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact PS-1: Increased demand for fire protection facilities

Impact Discussion

Project Impacts. Additional development anticipated under the proposed 2040 General Plan would be expected to result in an increase in demand for fire protection services. In 2018 Santa Paula was annexed into the Ventura County Fire Department, and a Memorandum of Agreement between the City and VCFD was executed describing services and funding. The Plan for Service¹⁵⁹ approved by LAFCo as part of the annexation describes how fire protection services will be provided in Santa Paula.

Two fire stations currently serve Santa Paula, both of which are proposed to be upgraded to meet industry standards. The planned upgrades include enhancements such as advanced computer networks and other technologies, cardiac monitors, and self-contained breathing

¹⁵⁹ Ventura LAFCo, Case No. 17-08, November 15, 2017 staff report Attachment 2



apparatuses. New personnel protective equipment is also anticipated. VCFD has indicated that it plans to rebuild City Station 29 on the current site and rebuild Station 26 either inside or outside City limits to provide coverage to Santa Paula. According to the plan for service, with the upgrades to the current stations, VCFD will be able to respond to any developed area in Santa Paula within its 8.5-minute response time goal. The Plan for Service indicates that the additional station originally planned for East Area 1 will not be necessary.

Proposed 2040 General Plan policies and programs related to fire protection facilities are shown in **Table 4.15-2**. These policies and programs would support VCFD in providing adequate fire protection to Santa Paula and reduce potential impacts associated with adoption of the General Plan to a level that is less than significant.

The specific details of the fire stations proposed to be improved or replaced have not been determined at this time. Construction of new or remodeled facilities has the potential to result in significant impacts; however, such projects must comply with all applicable construction and environmental regulations (e.g., air quality standards, water quality regulations, etc.) that also apply to other types of development activities. Compliance with those requirements, which are discussed in each topical section of this EIR, will be demonstrated through project-level environmental review in conformance with CEQA at the time site-specific development plans are prepared, and mitigation measures may be required to avoid or reduce potential adverse environmental effects related to those projects.

Table 4.15-2 General Plan Policies and Programs Related to Fire Protection Facilities

Policies	Programs
<p>PSU 2.1 Fire protection and emergency medical services. Work cooperatively with VCFD to ensure that persons and property are protected from fires and provide emergency medical services through the following strategies:</p> <ul style="list-style-type: none"> - Locate firefighting facilities and resources where they can effectively serve the community. - Encourage partnerships and mutual aid agreements between VCFD and other fire protection organizations. - Incorporate designs, systems and practices for fire safety, prevention and suppression in new developments. - Work with VCFD to ensure that Santa Paula is served with the best available equipment and personnel. - Development should mitigate undue risks from fires. - A fire safety and equipment access standard should be appropriately designed and implemented. - A fire safety plan should be required of all businesses and multi-family occupancies. - A program for fire safety plans and training should be designed and implemented. <p>PSU 2.2 Fire protection facilities financing. Utilize impact fees, development agreements, or other financing techniques to ensure</p>	<p>PSU 2.a Code compliance. Continue to implement a program to ensure compliance with fire codes, including weed abatement, site maintenance, and other fire hazard mitigations.</p> <p>PSU 2.b Land planning and development review. As part of the development review process:</p> <ul style="list-style-type: none"> - Require new developments to contribute on a fair-share basis to the provision of fire protection facilities required to serve the development. - Assist applicants in demonstrating compliance with fire protection regulations and standards, including availability of adequate water supply for fire suppression, siting of structures, site access, use of fire retardant vegetation, and setbacks from natural vegetation. - When new fire stations or modifications to existing stations are required, work cooperatively with VCFD to ensure that any potential environmental impacts resulting from such construction are mitigated to the greatest extent feasible. <p>PSU 2.c Annual review. Work with VCFD to review fire protection needs annually as part of the City's budget and Capital Improvement Program process, and revise plans and programs as necessary to achieve desired objectives. Implement a phased</p>



Policies	Programs
that new developments defray their proportionate share of the cost of fire protection facilities needed to serve the projects.	program to replace substandard water mains, fire hydrants, and facilities. Review and update City building and fire codes in coordination with triennial state code updates.

Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to fire protection services would be less than significant.¹⁶⁰ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

Impact PS-2: Increased demand for police protection facilities

Impact Discussion

Project Impacts. Additional development anticipated under the proposed 2040 General Plan would be expected to result in an increase in demand for police protection. The City's desired standard under both the current and proposed 2040 General Plan is 1.25 sworn police officers per 1,000 residents, or 1 officer per 800 residents. To achieve this standard, a total of 50 sworn officers would be required to serve the city's projected 2040 population of 39,600.

The Police Department currently operates from the police station located at 214 S. 10th Street, adjacent to City Hall. A potential new police substation site has also been identified in the East Area 1 Specific Plan to accommodate future growth. At this time, no additional police facilities other than the East Area 1 substation are anticipated.

Proposed General Plan policies and programs related to police protection facilities are shown in **Table 4.15-3**. These policies and programs would facilitate the provision of adequate police protection in Santa Paula and reduce potential impacts associated with adoption of the General Plan to a level that is less than significant.

160 SCAG 2016-2040 RTP/SCS PEIR, p. 3.15-33



The specific details of the police substation proposed in East Area 1 have not been determined at this time. Construction of new police facilities has the potential to result in significant impacts; however, such projects must comply with all applicable construction and environmental regulations (e.g., air quality standards, water quality regulations, etc.) that also apply to other types of development activities. Compliance with those requirements, which are discussed in each topical section of this EIR, will be demonstrated through project-level environmental review in conformance with CEQA at the time site-specific development plans are prepared, and mitigation measures may be required to avoid or reduce potential adverse environmental effects related to those projects.

Table 4.15-3 General Plan Policies and Programs Related to Police Protection Facilities

Policies	Programs
<p>PSU 1.1 Police protection. Protect persons and property from criminal activity through the following strategies:</p> <ul style="list-style-type: none"> - Locate police facilities and resources where they can effectively serve the community. - Facilitate partnerships between the Santa Paula Police Department, other law enforcement agencies, schools and other community organizations to prevent crime. - The Police Department should be staffed with the best available police officers, supervisors, civilian personnel, administrators, and equipment. The number of sworn officers should be adequate to provide a full range of services to the community. A ratio of 1.25 officers per 1,000 population is desirable. <p>PSU 1.2 Public facilities financing. Utilize impact fees, development agreements, or other financing techniques to ensure that new developments defray their proportionate share of the costs of police facilities needed to serve the developments.</p>	<p>PSU 1.a Land planning and development review.</p> <ul style="list-style-type: none"> - As part of the development review process for specific plans and major development proposals, require a fiscal impact analysis demonstrating that the development will contribute on a fair-share basis for the cost of police protection required to serve the project. - When new police facilities or modifications to existing facilities are required, ensure that any potential environmental impacts resulting from such facilities are mitigated to the greatest extent feasible. <p>PSU 1.b Crime prevention through environmental design (CPTED). Incorporate CPTED and defensible space principles and best practices into the Development Code and project review procedures for new developments and major renovations. Project design features should include concepts such as:</p> <ul style="list-style-type: none"> - Natural Surveillance - orient buildings and windows to provide maximum surveillance of exterior areas, and locate entryways such that they are visible to adjacent neighbors or passersby - Natural Access Control - use landscaping such as low hedges and flowerbeds to identify points of entry and movement on property, and use signage and symbolic barriers to direct vehicular and pedestrian traffic - Natural Territorial Reinforcement - use thorny or thick plant materials in perimeter landscape areas to discourage cutting through parking areas and rear yards, trampling vegetation, approaching ground floor windows, or climbing fences and walls - Low Maintenance Design – reduce property maintenance costs by using graffiti-resistant surface materials, vandal-proof lighting, and landscaping selected for durability - Shared Facilities - promote activity in public areas by coordinating shared uses of facilities such as parking lots, parks and sports fields. Enforce property maintenance and environmental design regulations for businesses, including regulations for alcohol and tobacco advertisements. Assist storeowners in identifying low-cost solutions to maintenance issues. Continue to enforce provisions in the Municipal Code to manage alcoholic beverage sales locations and hold storeowners accountable for litter, graffiti, or other public nuisances connected to their stores



Policies	Programs
	<ul style="list-style-type: none">- Lighting Standards - Ensure proper illumination standards in compliance with current best practices for security lighting <p>PSU 1.c Mutual aid agreements. Maintain mutual aid agreements with other police departments.</p> <p>PSU 1.d Annual review. Review police protection needs annually as part of the City's budget and Capital Improvement Program process, and revise plans and programs as necessary to achieve desired objectives.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to police protection services would be less than significant.¹⁶¹ The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

Impact PS-3: Increased demand for school facilities

Impact Discussion

Project Impacts. Future development anticipated under the proposed 2040 General Plan would be expected to result in additional students at local schools. As noted in the proposed Land Use Element, a potential school site has been identified in the Adams Canyon Expansion Area. The need for a new school in this area will be reevaluated in collaboration with SPUSD prior to development in Adams Canyon.

Although new residential development would generate additional students and place additional demand on existing schools, §65995(h) of the *California Government Code* (Senate Bill 50 of 1998) states that payment of statutory fees “...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental

¹⁶¹ SCAG 2016-2040 RTP/SCS PEIR, p. 3.15-33



organization or reorganization.” In accordance with State law, new residential developments will be required to pay school fees at the applicable rate in effect at the time of development.

Any modifications to existing schools or new school facilities built in the future will be subject to CEQA review by the school district as lead agency and environmental impacts will be evaluated and mitigation measures may be required as necessary prior to development.

The proposed 2040 General Plan includes policies and programs related to school facilities as shown in **Table 4.15-4**. These policies and programs would reduce potential impacts associated with adoption of the proposed General Plan to a level that is less than significant.

Table 4.15-4 General Plan Policies and Programs Related to School Facilities

Policies	Programs
<p>PSU 4.1 School facilities. Work cooperatively with local school districts to enhance existing schools, school-related uses and school grounds in Santa Paula, and help to facilitate development of additional school facilities needed to serve new development. Promote the establishment of additional educational facilities, such as community college and private secondary schools, in Santa Paula.</p>	<p>PSU 4.a Development review. As part of the review process for major developments and specific plans, work cooperatively with local school districts to evaluate the need for new or expanded school facilities. (LU IM 3)</p> <p>PSU 4.b Adams Canyon school site. Require dedication of 40 acres for a school site in the Adams Canyon Specific Plan, if deemed necessary in consultation with Santa Paula Unified School District.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that cumulative impacts of the 2016-2040 RTP/SCS related to schools would be less than significant.¹⁶² The proposed 2040 General Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

¹⁶² SCAG 2016-2040 RTP/SCS PEIR, p. 3.15-28



Impact PS-4: Increased demand for library facilities

Impact Discussion

Project Impacts. Future development anticipated under the proposed 2040 General Plan would be expected to result in additional demand for library services; however, no new or expanded library facilities are proposed as part of the 2040 General Plan. The proposed General Plan policies and programs listed in **Table 4.15-5** below would ensure that additional demand on library facilities caused by major developments is addressed in cooperation with the Library District during the development review process. These proposed policies and programs would reduce impacts associated with General Plan adoption to a level that is less than significant. Prior to development of any new or expanded library facilities, project-level environmental review by the Library District as Lead Agency will be required, and site-specific mitigation measures may be imposed to avoid or reduce potential environmental impacts.

Table 4.15-5 General Plan Policies and Programs Related to Library Facilities

Policies	Programs
PSU 5.1 Library facilities. Work cooperatively with Blanchard Community Library to enhance library services within the city and facilitate the expansion of services to serve new development.	PSU 5.a Development review. As part of the review process for major developments and specific plans, work cooperatively with the local Library District to address the need for new or expanded facilities.

Cumulative Impacts. The RTP/SCS PEIR does not address impacts of the 2016-2040 RTP/SCS related to libraries. The proposed 2040 General Plan policies and programs together with required CEQA review by the Library District as lead agency would reduce cumulative impacts to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant



Impact PS-5: Increased demand for other public facilities

Impact Discussion

The impact analyses above address fire, police, school and library facilities. Impacts related to other public facilities, including roads, water and wastewater, drainage, parks and recreation, are addressed elsewhere in this EIR.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant



4.16 Recreation

This chapter analyzes impacts of the proposed 2040 General Plan on recreational facilities.

4.16-1 Setting

Existing Physical Conditions

The Santa Paula Parks and Recreation Department operates a variety of parks, recreational facilities and programs for Santa Paula residents. The City's goal is to provide 5 acres of parkland per 1,000 residents.

City Parks and Recreation Facilities

The current Santa Paula park system includes two neighborhood parks, nine mini parks, and two special interest parks. The City does not have a community park; however, planning and design is underway for a 37-acre community park in East Area 1. Currently the largest special interest park, George Harding Park, provides some community park uses. Community parks, which are usually 14 to 40 acres in size, can provide a wide variety of uses such as swimming pools, athletic fields, community/recreation centers, cultural centers, picnic areas, and gardens. Parks serving Santa Paula are listed in **Table 4.16-1** and shown in **Exhibit 4.16-1**.

Neighborhood parks are defined as having a usable size of 5 to 15 net acres and provide for the daily recreational needs of residents within a 1-mile service area. Mini parks are defined as parks that are less than 5 acres and provide passive or limited recreational opportunities to a specific area.

Special interest parks are defined as facilities with a particular use that generally serves the entire community irrespective of park size.

Recreational facilities include: five playgrounds at Teague, Las Piedras, Mill, Obregon, and Veterans Memorial parks; two lighted soccer fields at Teague and Las Piedras parks; fields for softball, baseball, and Little League at George Harding Park; a softball field at Obregon Park; and basketball courts and picnic tables in various City parks. The City also operates a community center, a senior center, and approximately 3 miles of bike trails.



Table 4.16-1 Existing and Proposed Park Facilities

Type	Name	Size (acres)
Existing parks		
Neighborhood Parks	Teague Park	5.7
	Las Piedras Park	4.5
Mini Parks	Railroad Plaza Park	3.0
	Mill Park	2.9
	Obregon Park	2.4
	Fagan Barranca Park	2.0
	Veterans Memorial Park	1.5
	Recreation Park	0.8
	Ebell Park	0.8
	Moreton Bay Fig Tree Park	0.1
	Santa Paula Bike Path	5.0
Special Interest Parks	George Harding Park	12.2
	Skate Park at Veterans Mem. Park	0.3
Subtotal – developed		41.2
Undeveloped	Santa Clara River	86.5
Subtotal – existing (developed and undeveloped)		127.7
Approved and proposed parks		
East Area 1 Specific Plan*		93
Adams Canyon		110
Fagan Canyon		7
South Mountain		115
Subtotal - proposed		315
Grand Total		442.7

*Approved pursuant to the East Area 1 Development Agreement

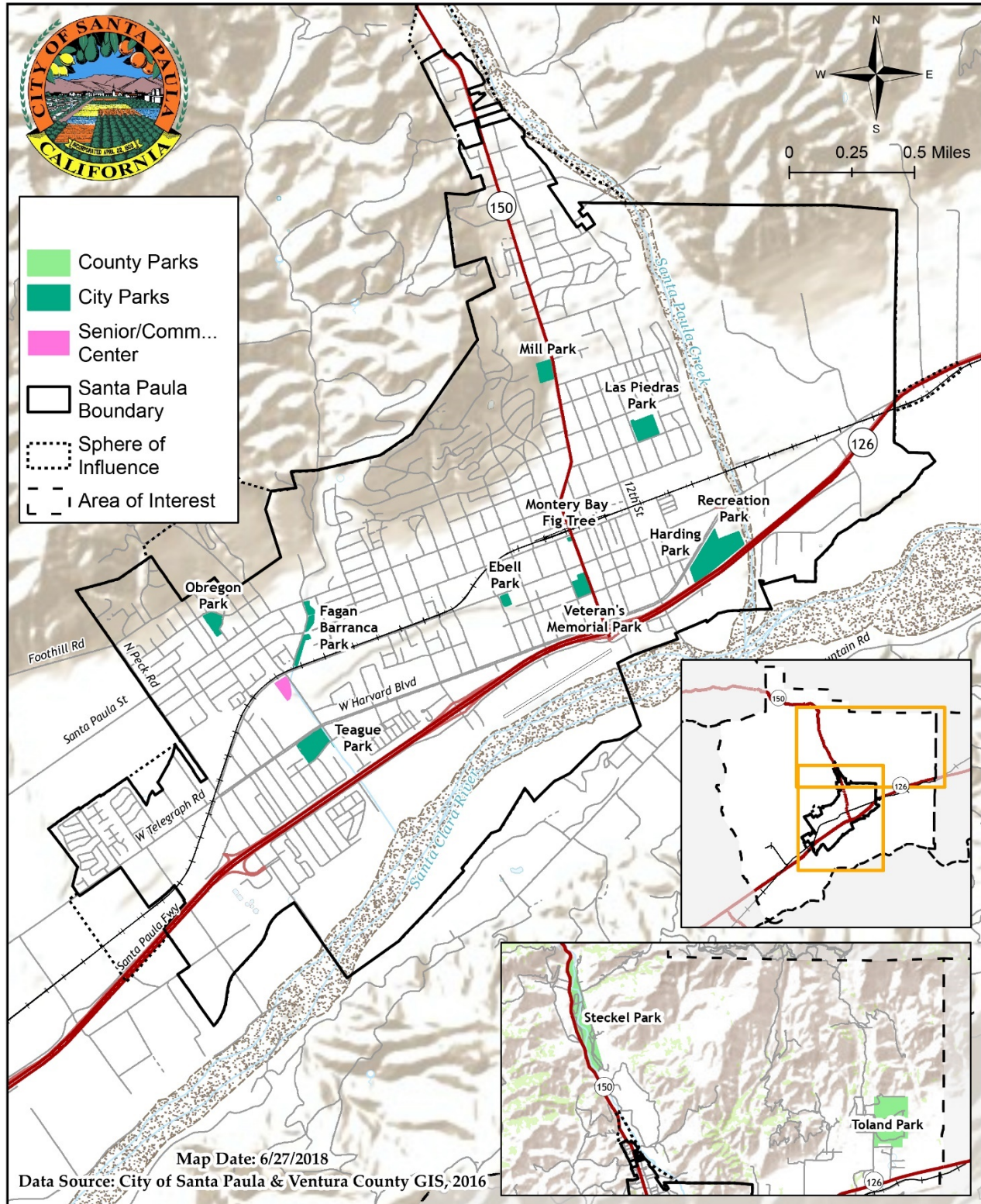


Exhibit 4.16-1 Existing Park Facilities



In addition, the City and the Santa Paula Unified School District have entered into a joint use agreement that provides for shared use of fields and facilities. Santa Paula High School, Isbell Middle School, and seven elementary schools allow organized sports leagues to use their fields and grounds providing additional recreation opportunities and open space amenities for Santa Paula residents. School facilities include 1 football field, 1 swimming pool, 30 basketball half-courts, 3 basketball full-courts, 10 softball fields, 1 baseball field, 9 soccer fields, 6 tennis courts, 10 handball walls, 1 running track, and 11 tot lots.

County Parks and Recreation Facilities

Residents in Santa Paula also have access to nearby County regional parks and open space areas. Steckel Park is a 200-acre regional park located in the unincorporated area just north of the city. The park offers a variety of recreational activities including barbecues, camping, hiking, biking, and wilderness exploring.

South Mountain, which lies within County unincorporated territory, offers recreational opportunities including a golf course and hiking trails. As envisioned in the Land Use Element, the South Mountain area has the potential for development of 15 acres of active parks (including 6 soccer fields), approximately 100 acres of regional parkland (staging area for canyon hiking trails), with the remainder to be retained in current uses.

Toland Regional Park is a 213-acre passive, natural open space park with restrooms, picnic tables and barbecues located approximately 3 miles east of Santa Paula north of SR-126.

Regulatory Framework

State

General Plan Law. Section 65302(a) of the *California Government Code* lists recreation as a land use that must be planned for in the Land Use Element of the General Plan.

Section 65560 requires the Open Space Element¹⁶³ to address “Open space for outdoor recreation, including, but not limited to, areas of outstanding scenic, historic, and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas that serve as links between major recreation and open space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.” The element must also contain specific programs to implement the open space plan.

¹⁶³ In the proposed 2040 General Plan, Open Space Element requirements are addressed in the Environmental and Cultural Resources Element.



California Recreational Trails Act. *Public Resources Code* Sec. 5076 requires cities and counties to consider demands for trail-oriented recreational use in the Open Space Element of the General Plan and consider such demands in developing specific open-space programs. Local governments must also consider the feasibility of integrating trail routes with appropriate segments of the state system.

Local

Santa Paula Parks and Recreation Master Plan. The Santa Paula Parks and Recreation Master Plan, adopted in 2006, contains policies, park standards, current and future needs assessments, analysis of facility conditions, fee adjustments and funding/financial recommendations to address the needs, issues, and demands for recreation programs, facilities, and parks to better serve the Santa Paula community. The Master Plan recommends a park standard of 5 acres per 1,000 population, which is reflected in the proposed General Plan policies.

East Area 1 Specific Plan. The East Area 1 Specific Plan, as amended in 2015, identifies a total of approximately 88 acres of parkland including approximately 55.2 acres of neighborhood parks and greenways in three neighborhoods and the Civic District; and approximately 37.8 acres of shared use athletic fields available for school and community use within the Specific Plan area.

Santa Paula Municipal Code. Section 16.80.970 of the Municipal Code requires subdivisions to dedicate parkland and open space to the City or pay impact fees in accordance with the adopted fee schedule.

4.16-2 Thresholds of Significance

The following thresholds of significance pertaining to potential impacts to parks and recreational facilities are excerpted from Appendix G of the current CEQA Guidelines. The 2040 General Plan would result in a significant impact if the Plan and its implementation would:

- a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (Impact REC-1)
- b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (Impact REC-1)



4.16-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to parks and recreation expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

Impact REC-1: Substantial physical deterioration of existing parks or recreational facilities, or impacts due to expansion or development of parks or recreational facilities

Impact Discussion

Project Impacts. Future development anticipated under the proposed 2040 General Plan would be expected to result in additional usage of parks and recreation facilities. Unless existing parks are expanded or new parks are developed, this additional demand could result in physical deterioration of existing parks due to increased usage.

The proposed General Plan Land Use Plan establishes two Open Space designations related to parks and recreation:

- **Open Space/Passive.** The Passive Open Space category provides physical and visual relief to the urban environment. It is a sustainable resource for water recharge, drainage, and biological habitat. Passive Open Space also provides land for outdoor recreational activities such as hiking. The intent of this land use category is to protect land that is to remain undeveloped, such as properties in the Santa Clara River bed (south of the public levee bank protection line), Santa Paula Creek, undevelopable and set-aside areas of Adams Barranca and Fagan Barranca, and undevelopable slopes and natural landmarks. Permitted uses are limited to flood control channels and other waterways, bridges, and hiking, biking and pedestrian trails. Surface mining may be permissible through a Conditional Use Permit.
- **Open Space/Parks and Recreation.** The Park and Recreation Open Space category includes neighborhood parks, undeveloped potential parkland including linear park corridors, and active recreation such as golf courses. Surface mining may also be permissible through a Conditional Use Permit.



The proposed General Plan policies and programs listed in **Table 4.16-2** below would establish criteria to ensure that additional demand for parks and recreation facilities caused by new development is addressed during the development review process.

New parks are proposed in East Area 1, Adams Canyon, Fagan Canyon and South Mountain to serve the increased need for parks. New developments are required to provide parkland and/or improvements or funding for park improvements or recreation programs.

Conformance with these proposed policies and programs would reduce potential impacts to a level that is less than significant by ensuring that sufficient park and recreation facilities are provided, thereby avoiding substantial physical deterioration due to overuse.

Development of proposed new or expanded recreation facilities could result in potentially significant impacts; however, such development must comply with all applicable construction and environmental regulations (e.g., air quality standards, water quality regulations, etc.) that also apply to other types of development activities. Compliance with those requirements, which are discussed in each topical section of this EIR, will be demonstrated through project-level environmental review in conformance with CEQA at the time site-specific development plans are prepared, and mitigation measures may be required to avoid or reduce potential adverse environmental effects related to those projects.

Therefore, potential impacts associated with adoption of the proposed General Plan would be less than significant.

Table 4.16-2 General Plan Policies and Programs Related to Park and Recreation Facilities

Policies	Programs
<p>PSU 6.1 Parks and recreational amenities. Enhance existing amenities such as parks, trails and recreational facilities, and encourage the provision of additional facilities to enrich the quality of life for current and future residents, visitors and employees in Santa Paula. Parks, recreational areas, open spaces, natural areas, civic and cultural resources should be accessible to all, including children, adults, seniors and those with disabilities.</p> <p>PSU 6.2 Parkland standards. Provide active parkland consistent with national standards based on population at a rate of 5 acres per 1,000 people.</p> <p>PSU 6.3 Neighborhood parks. New residential developments should be served by neighborhood parks.</p> <p>PSU 6.4 Joint use of school and park facilities. Facilitate joint use programs for school and City recreational facilities.</p> <p>PSU 6.5 Public involvement. Encourage public involvement in park planning and design.</p> <p>PSU 6.6 Priority facilities. Periodically review and update the City's priorities for additional parks and recreation facilities.</p> <p>PSU 6.7 Park and recreation funding. Prepare and maintain a five-year Capital Improvement Plan that provides for park and recreation facilities and programs. Utilize the following funding techniques, as appropriate:</p>	<p>PSU 6.a Parks and Recreation Master Plan. Review and update the City's Parks and Recreation Master Plan on a regular basis, including 5-year and 20-year schedules for the rehabilitation and improvement of park facilities.</p> <p>PSU 6.b Development review.</p> <ul style="list-style-type: none">- As part of the review process for new developments, assist applicants in demonstrating compliance with all parks and recreation policies and standards.- When new park facilities or modifications to existing facilities are proposed, ensure that any potential environmental impacts resulting from such facilities are mitigated to the greatest extent feasible. <p>PSU 6.c Railroad right-of-way. Continue to implement a landscaping and linear park program for the railroad right-of-way.</p>

4. Environmental Setting and Impact Analysis
4.16 – Recreation



Policies	Programs
<ul style="list-style-type: none"> - Quimby fees - Special taxes - Bonds or assessment districts - Impact fees - Development agreements - Provide youth, adult, and senior activities on a user-pay basis to minimize the cost of these programs - Encourage nonprofit organizations to provide recreation-related activities in the City - Continue to solicit funds and donations for the Community Center Endowment Fund. <p>PSU 6.8 Multi-function parks and open space. Create multi-functional parks and open space that benefit people and the environment by protecting and enhancing water supplies, and providing flood and storm water management services. Identify opportunities to use and connect public lands such as playing fields, parks, and street rights-of-way for “green solutions” to water quality and supply problems.</p> <p>PSU 6.9 Bike routes and trails. Designate bike routes along flood control channels, Ojai Road, Santa Paula Street, Harvard Boulevard and the railroad right-of-way. Designate hiking and equestrian trails along flood control channels and Edison rights-of-way from the mountains to the river. Develop a plan for a hiking trail along the Santa Clara River from Santa Paula Creek to 12th Street and then from Palm Avenue to Peck Road and ultimately to Adams Barranca.</p> <p>PSU 6.10 Expansion Areas. As part of the planning process for new development in the expansion areas, require specific plans to include parks, recreational facilities and open space consistent with the Land Use Element.</p> <p>LU 1.3 Natural features. Ensure that new development and infrastructure are designed in a manner that protects natural features such as barrancas, tree rows, wetlands, ridgelines, and wildlife movement corridors.</p> <p>LU 1.11 Railroad corridor. Encourage land uses adjacent to the railroad corridor that are compatible with public recreational use of the corridor as well as adjacent established conforming land uses.</p> <p>LU 3.11 Public facilities. Designate sufficient land in appropriate locations for governmental facilities, schools, parks, libraries, health care, social services, critical public safety facilities, and other civic uses.</p> <p>LU 4.4 Public services and infrastructure. Require new developments to demonstrate that adequate public services and infrastructure will be available to serve the development in conformance with the Circulation and Mobility Element and the Public Services and Utilities Element, and require major land development projects to provide comprehensive planning and fiscal impact analysis for public services and infrastructure demonstrating that the development will not result in a cost burden or capacity deficiency for existing areas of the city. Utilize development agreements, assessment districts, owner associations and/or development impact fees where appropriate to mitigate potential impacts. Require publicly-owned underground conduits to accommodate future information and utility needs in new developments.</p>	



Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to parks and recreation facilities.¹⁶⁴ The proposed Plan is consistent with RTP/SCS; however, the proposed policies and programs together with required compliance with existing regulations would reduce the incremental effects of implementation of the 2040 General Plan on parks and recreation facilities to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None necessary

Level of Significance after Mitigation

Less than significant

¹⁶⁴ SCAG 2016-2040 RTP/SCS PEIR, p. 3.16-23

4. Environmental Setting and Impact Analysis
4.16 – Recreation



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4.17 Transportation

This chapter analyzes transportation impacts that would be expected to occur under the 2040 General Plan. The analysis is based on the technical report provided in **Appendix D**. The analysis included pedestrian, bicycle, transit, and vehicular modes as well as goods movement and travel demand management (TDM). Passenger rail service is not provided in Santa Paula; therefore, impacts associated with rail transit are not addressed in this chapter. Since Santa Paula Airport does not provide commercial transportation service, impacts related to aviation are addressed in **Section 4.9 - Hazards**, **Section 4.11 - Land Use**, and **Section 4.13 – Noise**.

4.17-1 Setting

Study Area

The primary study area for transportation analysis purposes is defined by the City of Santa Paula municipal boundary and its Sphere of Influence as adopted by Ventura LAFCo in February 2018.

The technical study analyzed the SR-126 freeway and arterial and collector roadways designated in the current Santa Paula Circulation Element and the draft 2040 Circulation and Mobility Element. A total of 34 intersections were also studied. Three of the study intersections are located outside of the current Santa Paula municipal boundary, with an additional five intersections on the Santa Paula border. The following criteria were considered in the selection of study intersections:

- Intersections of arterial roadways with other arterials or collectors;
- Freeway ramp intersections; and
- Nearby intersections outside of municipal boundary.

Methodology

Vehicular Level of Service (LOS) is a quantitative measure describing how well a transportation facility operates from a driver's perspective. Conditions are generally described in terms of speed, travel time, freedom to maneuver, comfort, convenience, and safety. LOS A represents optimum operating conditions from a driver's perspective, while LOS F represents the worst. **Table 4.17-1** describes generalized definitions of vehicular LOS. Additional technical detail regarding the methodology for determining LOS is provided in **Appendix D**.

Santa Paula's existing General Plan establishes a policy standard of LOS C as the minimum acceptable level for City streets and intersections. Level of Service assumptions for roadways under County and Caltrans jurisdiction are described in Section 2.2.6 of the Technical Report (**Appendix D**) and are summarized as follows. For County facilities and Caltrans' Urban Streets,



LOS D is considered acceptable. The minimum desirable level of service on the analyzed freeway/state highway segments is LOS E, as described in the Ventura County Congestion Management Program (CMP). As discussed in **Section 3.4-3**, the 2040 General Plan proposes to revise the minimum acceptable service standard for City streets and intersections from LOS C to LOS D.

Table 4.17-1 Vehicular Level of Service Criteria

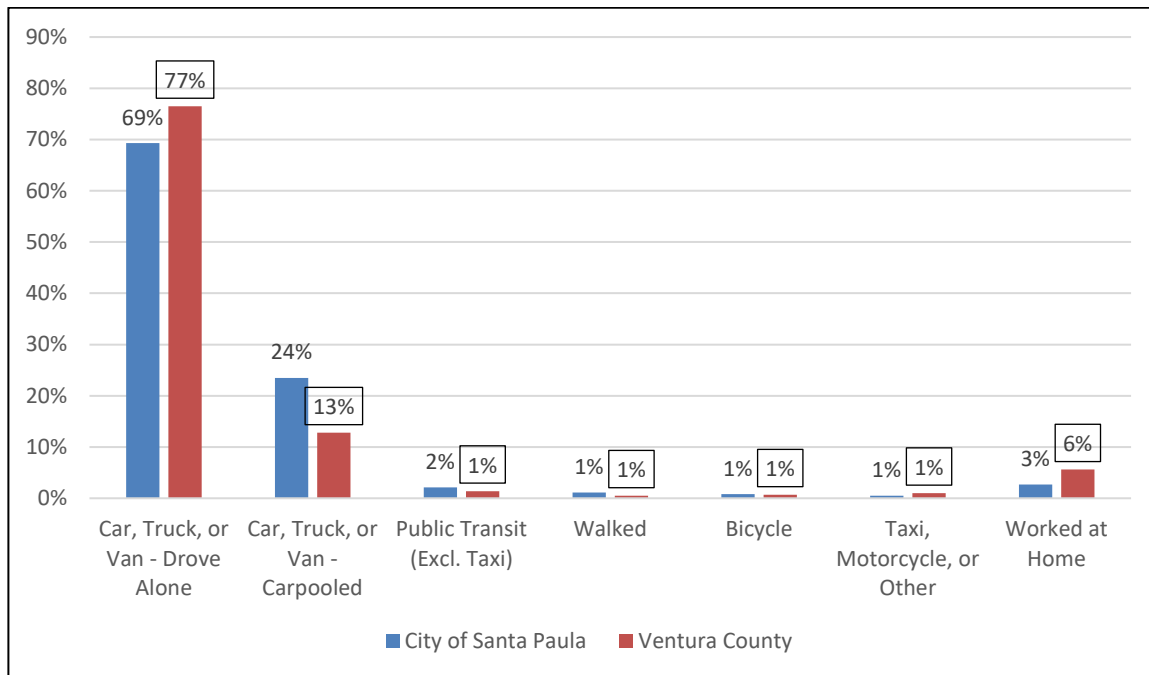
Level of Service (LOS)	Characteristics
A	Primarily free-flow operation. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Controlled delay at the boundary intersections is minimal. The travel speed exceeds 85% of the base free-flow speed.
B	Reasonably unimpeded operation. The ability to maneuver within the traffic stream is only slightly restricted and control delay at the boundary intersections is not significant. The travel speed is between 67% and 85% of the base free-flow speed.
C	Stable operation. The ability to maneuver and change lanes at mid-segment locations may be more restricted than at LOS B. Longer queues at the boundary intersections may contribute to lower travel speeds. The travel speed is between 50% and 67% of the base free-flow speed.
D	Less stable condition in which small increases in flow may cause substantial increases in delay and decreases in travel speed. This operation may be due to adverse signal progression, high volume, or inappropriate signal timing at the boundary intersections. The travel speed is between 40% and 50% of the base free-flow speed.
E	Unstable operation and significant delay. Such operations may be due to some combination of adverse signal progression, high volume, and inappropriate signal timing at the boundary intersections. The travel speed is between 30% and 40% of the base free-flow speed.
F	Flow at extremely low speed. Congestion is likely occurring at the boundary intersections, as indicated by high delay and extensive queuing. The travel speed is 30% or less of the base free-flow speed. Also, LOS F is assigned to the subject direction of travel if the through movement at one or more boundary intersections have a volume-to-capacity ratio greater than 1.0.

Source: Highway Capacity Manual 2010.

Existing Physical Conditions

Exhibit 4.17-1 below provides an overview of recent travel mode share for work trips within Santa Paula and Ventura County as a whole. In both the city and the county, commuting by private automobile is by far the dominant mode share, accounting for 69.3% and 76.5%, respectively. Bicycling was found to be the least common commute mode, accounting for 0.8% of commuters in Santa Paula and 0.7% in Ventura County.

According to the 2014 US Census Longitudinal Employer-Household Dynamics (LEHD), the size of the Santa Paula workforce was approximately 14,347 with 1,733 jobs located within Santa Paula. Therefore, about 12% of Santa Paula residents lived within biking or walking distance from their place of employment.



Source: American Community Survey 2014 Estimates; Chen Ryan Associates, 2019

Exhibit 4.17-1 City of Santa Paula Commute Share by Mode (2014)

Exhibit 4.17-2 displays the existing functional classifications for study area roadways, as identified in the current Circulation Element. **Table 4.17-2** summarizes the existing physical characteristics of the study roadways, including the number of lanes, functional classification, type of median, posted speed, presence of bicycle facility, on-street parking restrictions, and sidewalk presence.

Roadway Level of Service

Exhibit 4.17-3 displays the existing (2016) average daily traffic volumes and level of service for study area roadway segments. **Table 4.17-3** documents the existing study roadway segment level of service for all roadways that do not fall under Caltrans' jurisdiction, while **Table 4.17-4** presents existing study roadway level of service for 10th Street/Ojai Road/SR-150, since it falls under the Caltrans Urban Street classification. As noted in the Methodology discussion above, LOS C is considered acceptable under the current Circulation Element for City roadways, whereas LOS D is considered acceptable for County roadways and Caltrans Urban Streets. All roadways under City and County jurisdiction currently operate at LOS C or better while 10th Street/Ojai Road/SR-150 is currently operating at LOS D or better, in conformance with Caltrans standards.

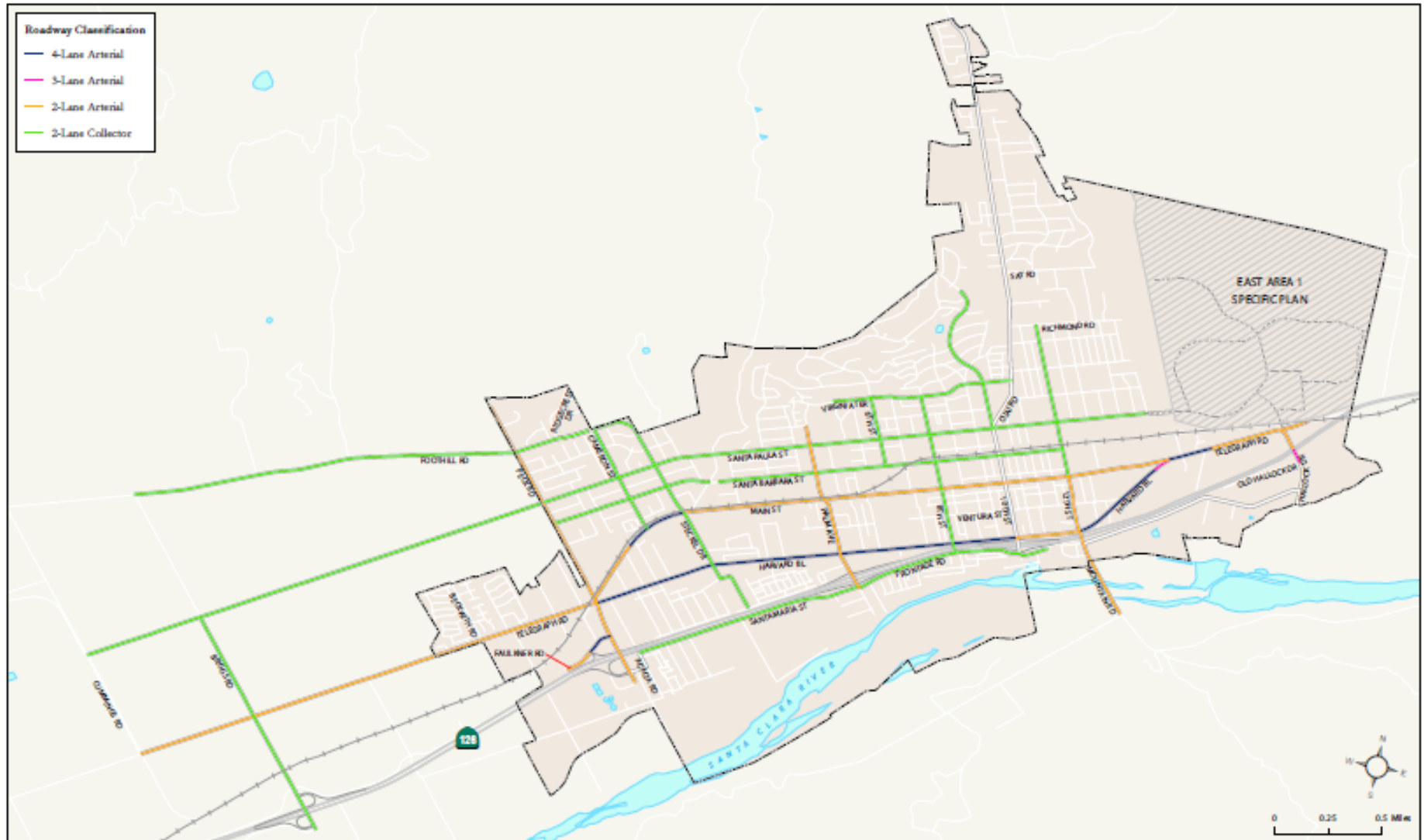


Exhibit 4.17-2 Existing Roadway Network and Functional Classifications



Table 4.17-2 Existing Roadway Characteristics

Roadway	From	To	# of Lanes	Existing Configuration	Median	Posted Speed (mph)	Bicycle Facilities	On-Street Parking	Sidewalks
North-South Roadways									
Briggs Road	Santa Paula Street	Telegraph Road	2	2-Lane Collector	Undivided	Not Posted	None	None	None
	Telegraph Road	SR-126 WB Ramps	2	2-Lane Collector	Undivided	Not Posted	None	None	None
	SR-126 WB Ramps	SR-126 EB Ramps	2	2-Lane Collector	Undivided	Not Posted	None	None	None
	SR-126 EB Ramps	Pinkerton Road	2	2-Lane Collector	Undivided	Not Posted	None	None	None
Peck Road	End	Foothill Road	2	2-Lane Arterial	Undivided	35	None	Parallel (East side only)	Yes (Sidewalks intermittent on west side)
	Foothill Road	Santa Paula Street	2	2-Lane Arterial	Undivided	35	None	Parallel (East side only)	Yes (Sidewalks intermittent on west side)
	Santa Paula Street	Santa Barbara Street	2	2-Lane Arterial	Undivided	35	None	Parallel (East side only)	Yes (Sidewalks intermittent on west side)
	Santa Barbara Street	Main Street	2	2-Lane Arterial	Undivided	35	None	Parallel (East side only)	Yes (Sidewalks intermittent on west side)
Peck Road	Main Street	Telegraph Road	2	2-Lane Arterial	Undivided	40	None	None	Yes (Asphalt on east side)
	Telegraph Road	Faulkner Road	2	2-Lane Arterial	Undivided	40	None	None	Yes (Asphalt on east side)
	Faulkner Road	SR-126 EB Ramps	2	2-Lane Arterial	Undivided	40	None	None	Yes (Asphalt on east side)
	SR-126 EB Ramps	End	2	2-Lane Arterial	Undivided	40	None	None	Yes (Asphalt on east side)
Cameron Street	Foothill Road	Main Street	2	2-Lane Collector	Undivided	Not Posted	None	Parallel	Yes
Steckel Drive	Foothill Road	Main Street	2	2-Lane Collector	Undivided	25	None	Parallel	Yes
	Main Street	Harvard Boulevard	2	2-Lane Collector	Undivided	25	Yes (Shared with parking on east side)	Parallel (East side only in sections)	Yes
	Harvard Boulevard	End	2	2-Lane Collector	Undivided	25	None	Parallel	Yes
Palm Avenue	End	Santa Paula Street	2	2-Lane Arterial	Undivided	30	None	Parallel	Yes (Intermittent on east side)



Roadway	From	To	# of Lanes	Existing Configuration	Median	Posted Speed (mph)	Bicycle Facilities	On-Street Parking	Sidewalks
	Santa Paula Street	Santa Barbara Street	2	2-Lane Arterial	Undivided	30	Yes (Shared with parking)	Parallel	Yes
Palm Avenue	Santa Barbara Street	Main Street	2	2-Lane Arterial	Undivided	30	Yes (Shared with parking)	Parallel	Yes
	Main Street	Harvard Boulevard	2	2-Lane Arterial	Undivided	30	Yes (Shared with parking)	Parallel	Yes
Palm Avenue	Harvard Boulevard	SR-126 WB Ramps	2	2-Lane Arterial	Undivided	Not Posted	Yes	None	Yes (East side only)
	SR-126 WB Ramps	SR-126 EB Ramps	2	2-Lane Arterial	Undivided	Not Posted	Yes	None	Yes (Asphalt)
	SR-126 EB Ramps	End	2	2-Lane Arterial	Undivided	Not Posted	None	Parallel	None
6 th Street	Virginia Terrace	Santa Barbara Street	2	2-Lane Collector	Undivided	Not Posted	None	Parallel	Yes
8 th Street	Virginia Terrace	Main Street	2	2-Lane Collector	Undivided	30	None	Parallel	Yes
	Main Street	Harvard Boulevard	2	2-Lane Collector	Undivided	30	None	Parallel	Yes
	Harvard Boulevard	Santa Maria Street	2	2-Lane Collector	Undivided	30	None	Parallel	Yes
10 th Street	End	Santa Paula Street	2	2-Lane Collector	Undivided	25	None	Parallel (Intermittent on west side north of Virginia Terrace)	Yes (Intermittent on west side north of Virginia Terrace)
10 th Street/SR-150	Santa Paula Street	Santa Barbara Street	2	2-lane Caltrans urban street	Undivided	25	Yes (Shared with parking)	Parallel	Yes
	Santa Barbara Street	Main Street	2	2-lane Caltrans urban street	CLTL	25	Yes (Shared with parking)	Parallel	Yes
10 th Street/SR-150	Main Street	E Ventura Street	2	2-lane Caltrans urban street	CLTL	25	Yes (Shared with parking)	Parallel	Yes
	E Ventura Street	Harvard Boulevard	2	2-lane Caltrans urban street	Undivided	25	Yes (Shared with parking)	Parallel	Yes
	Harvard Boulevard	SR-126 WB Ramps	2	2-lane Caltrans urban street	Undivided	Not Posted	None	None	Yes
	SR-126 WB Ramps	SR-126 EB Ramps/Santa Maria Street	2	2-lane Caltrans urban street	Undivided	Not Posted	None	None	Yes
Ojai Road/SR-150	Richmond Road	Virginia Terrace	2	2-lane Caltrans urban street	Undivided	25-40 SB 35-40 NB	None	Parallel (In Sections)	Yes (Sidewalks intermittent west side)



Roadway	From	To	# of Lanes	Existing Configuration	Median	Posted Speed (mph)	Bicycle Facilities	On-Street Parking	Sidewalks
	Virginia Terrace	Santa Paula Street	2	2-lane Caltrans urban street	Undivided	25 SB 35 NB	None	Parallel (In Sections)	Yes (Sidewalks intermittent west side)
12 th Street	Richmond Road	Main Street	2	2-Lane Collector	Undivided	30	None	Parallel	Yes
	Main Street	Harvard Boulevard	2	2-Lane Arterial	Undivided	30	None	Parallel	Yes
S. Mountain Road	Harvard Boulevard	City Limits	2	2-Lane Arterial	Undivided	Not Posted	None	None	Yes (Under SR-126 overpass only)
Hallock Drive	Telegraph Road	SR-126	4	4-Lane Arterial	Striped Median	Not Posted	None	Parallel (East side only)	East side only
Hallock Drive	SR-126	Old Hallock Drive	2 SB 1 NB	3-Lane Arterial	Undivided	Not Posted	None	Parallel	West side only
East-West Roadways									
Foothill Road	Briggs Road	Peck Road	2	2-Lane Collector	Undivided	55	None	None	None
	Peck Road	Ridgecrest Drive	2	2-Lane Collector	Undivided	25	None	Parallel	North side only
Virginia Terrace	End	Ojai Road	2	2-Lane Collector	Undivided	25	None	Parallel	Yes
Santa Paula Street	Cummings Road	Peck Road	2	2-Lane Collector	Undivided	Not Posted	None	None	None
	Peck Road	Palm Avenue	2	2-Lane Collector	Undivided	35	Yes (Shared with parking)	Parallel	Yes
	Palm Avenue	10th Street	2	2-Lane Collector	Undivided	25	Yes (Shared with parking)	Parallel	Yes
	10th Street	End	2	2-Lane Collector	Undivided	25	None	Parallel	Yes (Sidewalks Intermittent)
Santa Barbara Street	Peck Road	Dead End	2	2-Lane Collector	Undivided	25	None	Parallel	Yes
	Dead End	Palm Avenue	2	2-Lane Collector	Undivided	25	None	Parallel	Yes
	Palm Avenue	10th Street	2	2-Lane Collector	Undivided	25	None	Parallel	Yes (Section Missing on south side)
Santa Barbara Street	10th Street	12th Street	2	2-Lane Collector	Undivided	25	None	Parallel	Yes (Section Missing on north side)
Telegraph Road	Cummings Road	Briggs Road	2	2-Lane Arterial	Undivided	40	None	None	None
	Briggs Road	950 ft W of Beckwith Road	2	2-Lane Arterial	Undivided	40	None	None	None
	950 ft W of Beckwith Road	Peck Road	2	2-Lane Arterial	CLTL	40	None	Parallel (Intermittent on north side)	Yes (Sidewalks intermittent)

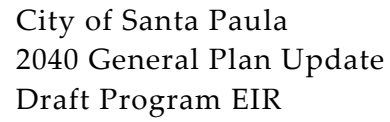


Roadway	From	To	# of Lanes	Existing Configuration	Median	Posted Speed (mph)	Bicycle Facilities	On-Street Parking	Sidewalks
Main Street	Main Street	850 ft E of Main Street	4	4-Lane Arterial	Raised Median	30	None	Parallel (Along dirt shoulder)	Yes (Along overpass only)
	850 ft E of Main Street	Hallock Drive	2	2-Lane Arterial	Undivided	45	None	Parallel (Along dirt shoulder)	None
	Hallock Drive	End	2	2-Lane Arterial	Undivided	Not Posted	None	South side only	South side only
	Peck Road	1500 ft W of Steckel Drive	2	2-Lane Arterial	CLTL	Not Posted	None	Parallel (South side only)	Rail trail north side
	1500 ft W of Steckel Drive	Steckel Drive	4	4-Lane Arterial	CLTL	Not Posted	None	None	Intermittent south side, rail trail north side
	Steckel Drive	Palm Avenue	2	2-Lane Arterial	Undivided	Not Posted	None	Parallel (South side only)	South side only (Rail trail along north side)
Main Street	Palm Avenue	8th Street	2	2-Lane Arterial	Undivided	25	None	Yes (Parallel north side, parallel/angled south side)	Yes (Rail trail west of 4th Street)
	8th Street	10th Street	2	2-Lane Arterial	Undivided	25	None	Angled	Yes
	10th Street	12th Street	2	2-Lane Arterial	Undivided	25	None	Yes (Parallel north side, parallel/angled south side)	Yes
	12th Street	Telegraph Road	2	2-Lane Arterial	Undivided	35	None	Parallel	Yes (Sidewalks intermittent)
Harvard Boulevard	Peck Road	Steckel Drive	4	4-Lane Arterial	CLTL	35	None	Parallel	Yes
	Steckel Drive	Palm Avenue	4	4-Lane Arterial	CLTL	35	None	Parallel	Yes
	Palm Avenue	8th Street	4	4-Lane Arterial	CLTL	30	None	Parallel	Yes
	8th Street	10th Street	4	4-Lane Arterial	CLTL	30	None	Parallel (North side only)	North side only (sidewalk intermittent)
	10th Street	12th Street	2	2-Lane Arterial	CLTL	30	None	Parallel (North side only)	Yes (Asphalt on south side)
	12th Street	440 ft W of Main Street / Telegraph Road	4	2-Lane Arterial	CLTL	30	Yes (Shared with parking)	Parallel	Yes (Asphalt on south side)
Harvard Boulevard	440 ft W of Main Street / Telegraph Road	Main Street / Telegraph Road	1 WB 2 EB	3-Lane Arterial	CLTL	30	Yes (Shared with parking)	Parallel	South side only



Roadway	From	To	# of Lanes	Existing Configuration	Median	Posted Speed (mph)	Bicycle Facilities	On-Street Parking	Sidewalks
Faulkner Road	End	SR-126 WB Ramps	2	2-Lane Arterial	Striped Median	Not Posted	None	Parallel	North side only
	SR-126 WB Ramps	Peck Road	4	4-Lane Arterial	Undivided	Not Posted	None	None	North side only
Santa Maria Street	Acacia Road	Palm Avenue	2	2-Lane Collector	Undivided	40	None	Parallel (South side only)	Yes (Asphalt) (Sidewalk intermittent south side)
	Palm Avenue	Dead End (parking lot)	2	2-Lane Collector	Undivided	40	None	Parallel (South side only)	Yes (Asphalt) (Sidewalk intermittent south side)
E Santa Maria Street	Dead End	10th Street	2	2-Lane Collector	Undivided	Not Posted	None	Parallel (South side only)	Yes (Asphalt) (Sidewalk intermittent south side)
	10th Street	End	2	2-Lane Collector	Undivided	Not Posted	None	Parallel (South side only)	Yes (Asphalt)

Source: Chen Ryan Associates, 2019



4. Environmental Setting and Impact Analysis

4.17 – Transportation





Table 4.17-3 Existing Roadway Segment Level of Service

Roadway	Segment	Count Date	Functional Classification	ADT	Capacity (LOS E)	V/C	LOS	Jurisdiction
Briggs Road	From Santa Paula Street to Telegraph Road	2/4/2016	2-Lane Collector	1,548	11,800	0.131	A	Ventura County
	From Telegraph Road to SR-126 WB Ramps	2/4/2016	2-Lane Collector	3,476	11,800	0.295	A	Ventura County
	From SR-126 WB Ramps to SR-126 EB Ramps	2/4/2016	2-Lane Collector	3,069	11,800	0.260	A	Ventura County
	From SR-126 EB Ramps to Pinkerton Road	2/4/2016	2-Lane Collector	2,191	11,800	0.186	A	Santa Paula
Peck Road	From northern terminus to Foothill Road	2/4/2016	2-Lane Arterial	122	20,000	0.006	A	Santa Paula
	From Foothill Road to Santa Paula Street	2/4/2016	2-Lane Arterial	2,654	20,000	0.133	A	Santa Paula
	From Santa Paula Street to Santa Barbara Street	2/4/2016	2-Lane Arterial	3,139	20,000	0.157	A	Santa Paula
	From Santa Barbara Street to Main Street	2/4/2016	2-Lane Arterial	3,632	20,000	0.182	A	Santa Paula
	From Main Street to Telegraph Road	2/4/2016	2-Lane Arterial	8,464	20,000	0.423	A	Santa Paula
	From Telegraph Road to Faulkner Road	2/4/2016	2-Lane Arterial	13,153	20,000	0.658	B	Santa Paula
	From Faulkner Road to SR-126 EB Ramps	2/4/2016	2-Lane Arterial	8,272	20,000	0.414	A	Santa Paula
	From SR-126 EB Ramps to southern terminus	2/4/2016	2-Lane Arterial	1,224	20,000	0.061	A	Santa Paula
Cameron Street	From Foothill Road to Main Street	2/4/2016	2-Lane Collector	2,246	11,800	0.190	A	Santa Paula
Steckel Drive	From Foothill Road to Main Street	2/4/2016	2-Lane Collector	2,269	11,800	0.192	A	Santa Paula
	From Main Street to Harvard Boulevard	2/4/2016	2-Lane Collector	4,650	11,800	0.394	A	Santa Paula
	From Harvard Boulevard to southern terminus	2/4/2016	2-Lane Collector	2,138	11,800	0.181	A	Santa Paula
Palm Avenue	From northern terminus to Santa Paula Street	4/2/2016	2-Lane Arterial	1,177	20,000	0.059	A	Santa Paula
	From Santa Paula Street to Santa Barbara Street	4/2/2016	2-Lane Arterial	4,460	20,000	0.223	A	Santa Paula
	From Santa Barbara Street to Main Street	4/2/2016	2-Lane Arterial	6,591	20,000	0.330	A	Santa Paula
	From Main Street to Harvard Boulevard	4/2/2016	2-Lane Arterial	12,856	20,000	0.643	B	Santa Paula
	From Harvard Boulevard to SR-126 WB Ramps	4/2/2016	2-Lane Arterial	14,693	20,000	0.735	C	Santa Paula
	From SR-126 WB Ramps to SR-126 EB Ramps	4/2/2016	2-Lane Arterial	8,416	20,000	0.421	A	Santa Paula
	From SR-126 EB Ramps to Santa Maria Street	4/2/2016	2-Lane Arterial	474	20,000	0.024	A	Santa Paula
	From SR-126 EB Ramps to southern terminus	4/2/2016	2-Lane Arterial	474	11,800	0.024	A	Santa Paula
6 th Street	From Virginia Terrace to Santa Barbara Street	4/2/2016	2-Lane Collector	1,924	11,800	0.163	A	Santa Paula
8 th Street	From Virginia Terrace to Main Street	2/2/2016	2-Lane Collector	4,519	11,800	0.383	A	Santa Paula
	From Main Street to Harvard Boulevard	2/2/2016	2-Lane Collector	3,722	11,800	0.315	A	Santa Paula
	From Harvard Boulevard to Santa Maria Street	2/2/2016	2-Lane Collector	1,754	11,800	0.149	A	Santa Paula
10 th Street	From northern terminus to Santa Paula Street	2/2/2016	2-Lane Collector	2,804	11,800	0.238	A	Santa Paula
10 th Street / SR-150	From Santa Paula Street to Santa Barbara Street	2/2/2016	2-Lane Highway	15,933	See Table 3-3			Caltrans
	From Santa Barbara Street to Main Street	2/2/2016	2-Lane Highway	14,612	See Table 3-3			Caltrans



Roadway	Segment	Count Date	Functional Classification	ADT	Capacity (LOS E)	V/C	LOS	Jurisdiction
10 th Street / SR-150	From Main Street to East Ventura Street	2/2/2016	2-Lane Highway	15,901	See Table 3-3			Caltrans
	From East Ventura Street to Harvard Boulevard	2/2/2016	2-Lane Highway	15,901	See Table 3-3			Caltrans
	From Harvard Boulevard to SR-126 WB Ramps	2/2/2016	2-Lane Highway	15,587	See Table 3-3			Caltrans
	From SR-126 WB Ramps to SR-126 EB Ramps	2/2/2016	2-Lane Highway	8,071	See Table 3-3			Caltrans
	From SR-126 EB Ramps to Santa Maria Street	2/2/2016	2-Lane Highway	8,071	See Table 3-3			Caltrans
Ojai Road / SR-150	From Northern City Limits Road to Virginia Terrace	2/2/2016	2-Lane Highway	12,624	See Table 3-3			Caltrans
	From Virginia Terrace to Santa Paula Street	2/2/2016	2-Lane Highway	13,870	See Table 3-3			Caltrans
12 th Street	From Richmond Road to Main Street	2/2/2016	2-Lane Collector	6,849	11,800	0.580	A	Santa Paula
	From Main Street to Harvard Boulevard	2/2/2016	2-Lane Arterial	4,242	20,000	0.212	A	Santa Paula
S. Mountain Road	From Harvard Boulevard to southern terminus	2/4/2016	2-Lane Arterial	4,457	20,000	0.223	A	Santa Paula
Hallock Drive	From Telegraph Road to SR-126	2/2/2016	2-Lane Arterial	6,007	20,000	0.300	A	Santa Paula
	From SR-126 to Old Hallock Drive	2/2/2016	3-Lane Arterial (2SB 1 NB)*	2,593	29,925	0.087	A	Santa Paula
Foothill Road	From Briggs Road to Peck Road	2/4/2016	2-Lane Collector	1,262	11,800	0.107	A	Ventura County
	From Peck Road to Ridgecrest Drive	2/4/2016	2-Lane Collector	472	11,800	0.040	A	Santa Paula
Virginia Terrace	From western terminus to Ojai Road	2/4/2016	2-Lane Collector	1,931	11,800	0.164	A	Santa Paula
Santa Paula Street	From Cummings Road to Peck Road	2/4/2016	2-Lane Collector	1,571	11,800	0.133	A	Ventura County
	From Peck Road to Palm Avenue	2/4/2016	2-Lane Collector	4,726	11,800	0.401	A	Santa Paula
Santa Paula Street	From Palm Avenue to 10 th Street	2/2/2016	2-Lane Collector	5,665	11,800	0.480	A	Santa Paula
	From 10 th Street to eastern terminus	2/2/2016	2-Lane Collector	1,831	11,800	0.155	A	Santa Paula
Santa Barbara Street	From Peck Road to dead end	2/4/2016	2-Lane Collector	616	11,800	0.052	A	Santa Paula
	From end to Palm Avenue	2/4/2016	2-Lane Collector	2,715	11,800	0.230	A	Santa Paula
	From Palm Avenue to 10 th Street	2/2/2016	2-Lane Collector	4,040	11,800	0.342	A	Santa Paula
	From 10 th Street to 12 th Street	2/2/2016	2-Lane Collector	2,721	11,800	0.231	A	Santa Paula
Telegraph Road	From Cummings Road to Briggs Road	2/4/2016	2-Lane Arterial	5,414	20,000	0.271	A	Ventura County
	From Briggs Road to 950 ft. west of Beckwith Street	2/4/2016	2-Lane Arterial	6,177	20,000	0.309	A	Ventura County
	From 950 ft. west of Beckwith Street to Peck Road	2/4/2016	2-Lane Arterial	6,266	20,000	0.313	A	Santa Paula
	From Main Street to 850 ft. east of Main Street	2/2/2016	4-Lane Arterial	5,870	39,900	0.147	A	Santa Paula
	From 850 ft. east of Main Street to Hallock Drive	2/2/2016	2-Lane Arterial	5,199	20,000	0.260	A	Santa Paula
	From Hallock Drive to eastern terminus	2/2/2016	2-Lane Arterial	1,326	20,000	0.066	A	Santa Paula
Main Street	From Peck Road to 1,500 ft. west of Steckel Drive	2/4/2016	4-Lane Arterial	5,406	39,900	0.135	A	Santa Paula



Roadway	Segment	Count Date	Functional Classification	ADT	Capacity (LOS E)	V/C	LOS	Jurisdiction
	From 1,500 ft. west of Steckel Drive to Steckel Drive	2/4/2016	4-Lane Arterial	7,559	39,900	0.189	A	Santa Paula
	From Steckel Drive to Palm Avenue	2/4/2016	2-Lane Arterial	7,673	20,000	0.384	A	Santa Paula
	From Palm Avenue to 8th Street	2/2/2016	2-Lane Arterial	10,085	20,000	0.504	A	Santa Paula
	From 8th Street to 10th Street	2/2/2016	2-Lane Arterial	7,024	20,000	0.351	A	Santa Paula
Main Street	From 10th Street to 12th Street	2/2/2016	2-Lane Arterial	4,637	20,000	0.232	A	Santa Paula
	From 12th Street to Harvard Boulevard	2/2/2016	2-Lane Arterial	3,907	20,000	0.195	A	Santa Paula
Harvard Boulevard	From Peck Road to Steckel Drive	2/4/2016	4-Lane Arterial	13,125	39,900	0.329	A	Santa Paula
	From Steckel Drive to Palm Avenue	2/4/2016	4-Lane Arterial	15,516	39,900	0.389	A	Santa Paula
	From Palm Avenue to 8th Street	2/4/2016	4-Lane Arterial	12,587	39,900	0.315	A	Santa Paula
	From 8th Street to 10th Street	2/2/2016	4-Lane Arterial	11,356	39,900	0.285	A	Santa Paula
	From 10th Street to 12th Street	2/2/2016	2-Lane Arterial	8,017	20,000	0.401	A	Santa Paula
	From 12th Street to 440 ft. west of Main Street	2/2/2016	4-Lane Arterial	3,290	39,900	0.082	A	Santa Paula
	From 440 ft. west of Main Street to Main Street	2/2/2016	3-Lane Arterial (1WB 2 EB)*	2,999	29,925	0.100	A	Santa Paula
Faulkner Road	From end to SR-126 WB Ramps	2/4/2016	2-Lane Arterial	1,519	20,000	0.076	A	Santa Paula
	From SR-126 WB Ramps to Peck Road	2/4/2016	4-Lane Arterial	8,090	39,900	0.203	A	Santa Paula
Santa Maria Street	From Acacia Road to Palm Avenue	2/2/2016	2-Lane Collector	2,078	11,800	0.176	A	Santa Paula
	From Palm Avenue to dead end	2/2/2016	2-Lane Collector	1,651	11,800	0.140	A	Santa Paula

Source: Counts Unlimited; Chen Ryan Associates, 2019

*3-lane roadway capacity is calculated at 75% of 4-lane capacity, based on functional classification.



Table 4.17-4 Caltrans Urban Street Arterial LOS – Existing Conditions

Roadway 10 th Street/Ojai Road/SR-150	Direction	AM Peak Hour			PM Peak Hour		
		Posted Speed Limit (mph)	Arterial Speed (mph)	LOS	Posted Speed Limit (mph)	Arterial Speed (mph)	LOS
Northern City Limit to Santa Paula Street	NB	25-40	37.0	A	25-40	36.9	A
	SB	25-40	12.3	D	25-40	14.7	C
Santa Paula Street to Santa Maria Street	NB	25	14.3	C	25	14.3	C
	SB	25	13.9	C	25	15.8	C

Source: Chen Ryan Associates, 2019

Freeway/State Highway Level of Service

State Route 126 (SR-126) provides the primary east-west regional connection through Santa Paula, running from US Highway 101 in Ventura to Interstate 5 in Santa Clarita. Local access is provided via interchanges at Briggs Road, Peck Road/Faulkner Road, Palm Avenue, and 10th Street, as well as an intersection at Hallock Drive. **Table 4.17-5** displays existing LOS from the freeway segment analysis for SR-126. LOS E is considered acceptable for freeway/state highways, and all freeway/state highway segments within the study area currently operate at LOS C or better.

Intersection Level of Service

Table 4.17-6 and **Exhibit 4.17-4** summarize the existing level of service conditions for the study area intersections. The following four intersections currently operate at a sub-standard LOS based upon the current Circulation Element standards during the AM and/or PM peak hour(s):

- Steckel Drive & Main Street – PM Peak Hour (LOS D)
- Palm Avenue & Santa Barbara Street – AM Peak Hour (LOS D)
- Palm Avenue and SR-126 EB Ramps – PM Peak Hour (LOS F)
- Ojai Road and Virginia Terrace – AM Peak Hour (LOS F) and PM Peak Hour (LOS F)



Table 4.17-5 Existing Freeway/State Highway Segment Level of Service

Freeway / State Highway	Segment	Direction	AM Peak Hour			PM Peak Hour		
			Density (pc/hr/ln)	Speed (mph)	LOS	Density (pc/hr/ln)	Speed (mph)	LOS
SR-126	SR-118 to Briggs Road	EB	589	70.0	A	1,535	68.7	C
		WB	1,348	69.7	C	940	70.0	B
SR-126	Briggs Road to Peck Road	EB	571	70.0	A	1,489	69.0	C
		WB	1,308	69.9	C	912	70.0	B
SR-126	Peck Road to Palm Avenue	EB	484	70.0	A	1,262	70.0	C
		WB	1,107	70.0	B	772	70.0	B
SR-126	Palm Avenue to 10 th Street/SR-150	EB	427	70.0	A	1,115	70.0	B
		WB	979	70.0	B	683	70.0	A
SR-126	10 th Street/SR-150 to Hallock Drive	EB	361	55.0	A	940	55.0	B
		WB	828	55.0	B	575	55.0	A
SR-126	Hallock Drive to Sespe Ranch Undercrossing*	EB	423	55.0	A	1,099	50.0	C
		WB	968	50.0	C	673	55.0	B

Source: Caltrans District 7, 2016; Chen Ryan Associates, 2019

* Analysis for this segment utilizes the multi-lane highway methodology as described in Chapter 2.2.4



Table 4.17-6 Existing Intersection Level of Service

	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour		Jurisdiction
			Avg. Delay (Seconds)	LOS	Avg. Delay (Seconds)	LOS	
1	Briggs Road & Telegraph Road	Signal	9.3	A	9.5	A	Ventura County
2	Briggs Road & SR-126 WB Ramps	SSSC	10.9	B	10.5	B	Caltrans
3	Briggs Road & SR-126 EB Ramps	SSSC	10.3	B	10.8	B	Caltrans
4	Peck Road & Foothill Road	SSSC	9.5	A	9.3	A	Santa Paula
5	Peck Road & Santa Paula Street	AWSC	11.9	B	9.5	A	Santa Paula
6	Peck Road & Santa Barbara Street	SSSC	11.9	B	10.6	B	Santa Paula
7	Peck Road & Main Street	Signal	9.4	A	8.2	A	Santa Paula
8	Peck Road & Telegraph Road	Signal	20.4	C	23.8	C	Santa Paula
9	SR-126 WB Ramps & Faulkner Rd	AWSC	21.5	C	13.7	B	Caltrans
10	Peck Road & SR-126 EB Ramps	AWSC	10.2	B	33.9	D	Caltrans
11	Steckel Drive & Main Street	AWSC	14.6	B	28.4	D	Santa Paula
12	Steckel Drive & Harvard Boulevard	Signal	8.8	A	7.6	A	Santa Paula
13	Palm Avenue & Santa Paula Street	AWSC	17.8	C	16.5	C	Santa Paula
14	Palm Avenue & Santa Barbara St	AWSC	25.9	D	15.8	C	Santa Paula
15	Palm Avenue & Main Street	Signal	11.7	B	10.1	B	Santa Paula
16	Palm Avenue & Harvard Boulevard	Signal	17.8	B	13.3	B	Santa Paula
17	Palm Avenue & SR-126 WB Ramps	SSSC	13.2	B	16.0	C	Caltrans
18	Palm Avenue & SR-126 EB Ramps	SSSC	32.6	D	53.5	F	Caltrans
19	Palm Avenue & Santa Maria Street	SSSC	11.4	B	14.2	B	Santa Paula
20	8 th Street & Main Street	Signal	8.9	A	8.0	A	Santa Paula
21	8 th Street & Harvard Boulevard	Signal	8.0	A	7.4	A	Santa Paula
22	Ojai Road & Virginia Terrace	SSSC	187.6	F	60.8	F	Caltrans
23	10 th Street & Santa Paula Street	Signal	16.5	B	16.5	B	Caltrans
24	10 th Street & Santa Barbara Street	Signal	10.5	B	8.8	A	Caltrans
25	10 th Street & Main Street	Signal	7.4	A	10.6	B	Caltrans
26	10 th Street & Harvard Boulevard	Signal	18.2	B	26.5	C	Caltrans
27	10 th Street & SR-126 WB Ramps	SSSC	13.5	B	15.9	C	Caltrans
28	10 th Street & SR-126 EB Off-Ramp	SSSC	15.7	C	27.1	D	Caltrans
29	10 th Street & E. Santa Maria Street/SR-126 EB On-Ramp	SSSC	8.4	A	8.5	A	Caltrans
30	12 th Street & Main Street	Signal	11.2	B	10.1	B	Santa Paula
31	12 th Street & Harvard Boulevard	Signal	8.0	A	8.2	A	Santa Paula
32	Harvard Boulevard & Telegraph Rd	SSSC	10.1	B	10.7	B	Santa Paula
33	Hallock Drive & Telegraph Road	AWSC	10.1	B	11.9	B	Santa Paula
34	Hallock Drive & SR-126	Signal	14.7	B	22.2	C	Caltrans

Source: Chen Ryan Associates, 2019

Notes:

Bold indicates sub-standard LOS D, E, or F (City intersections) based on current Circulation Element standards, or sub-standard LOS E or F (Caltrans and County intersections).

AWSC = All Way Stop Control.

SSSC = Side Street Stop Control.

For SSSC intersections, the delay shown is the worst delay experienced by any of the approaches.

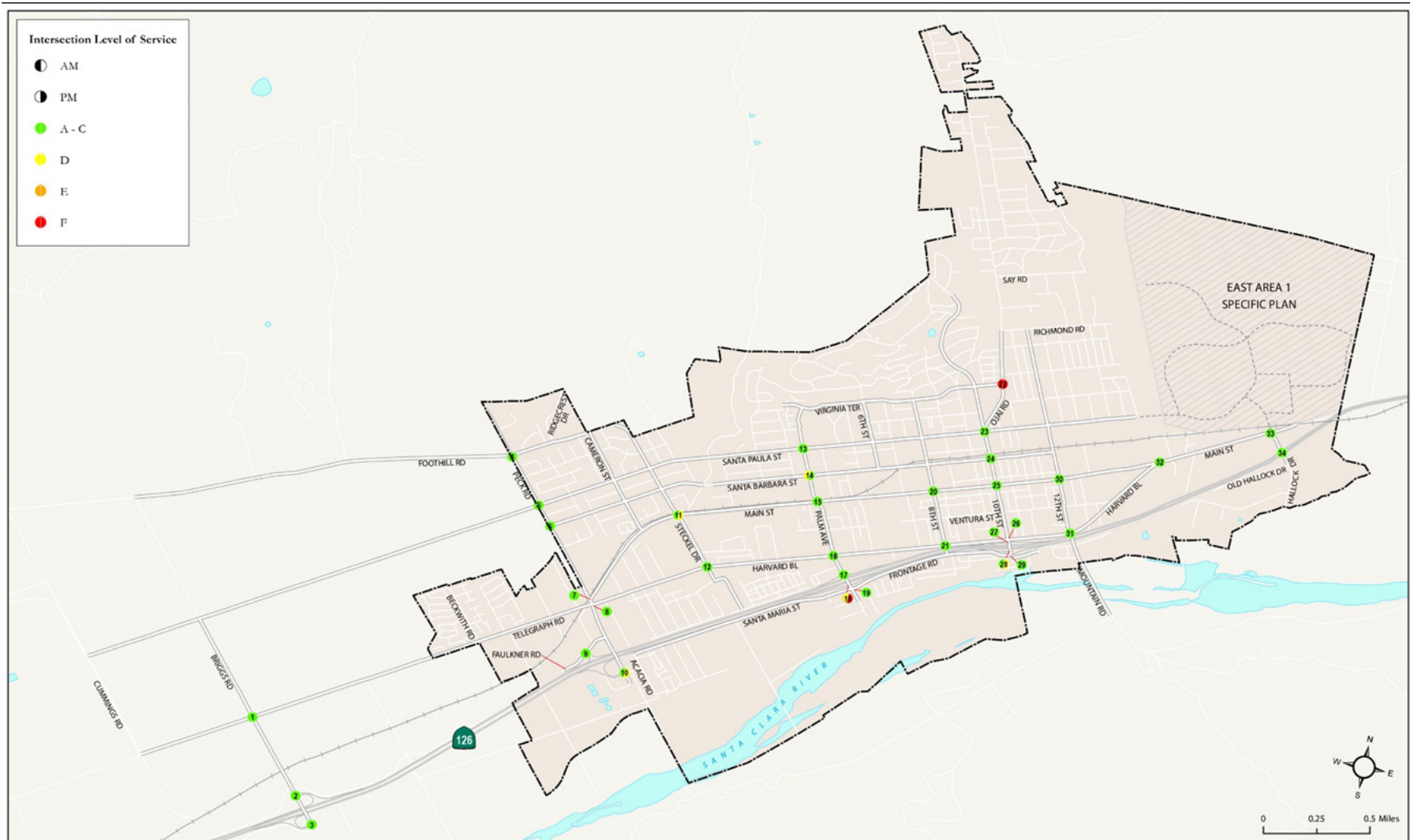


Exhibit 4.17-4 Existing Intersection Levels of Service



Public Transit Service

Transit service in Santa Paula is provided and managed by VCTC through a combination of VCTC intercity transit routes and local services operating under the name “Valley Express” (**Exhibit 4.17-6**). Bus stops provide access throughout Santa Paula as well as to the SR-126 corridor, which provides access to nearby cities including Fillmore and Ventura. No current or planned High Quality Transit Areas (HQTAs) are identified in the City of Santa Paula or its sphere of influence in the 2016-2040 RTP/SCS.

VCTC directly operates one bus route (Vista 126) that connects communities located along the SR-126 Corridor between the unincorporated community of Piru and the City of Ventura (**Exhibit 4.17-5**). Two stops are provided within Santa Paula: Santa Paula City Hall and adjacent to K-Mart on Faulkner Road west of Peck Road. Vista 126 operates between 5:45 a.m. and 10:26 p.m. on weekdays with 30- to 60- minute peak headways, and between 8:00 a.m. and 6:00 p.m. on Saturdays with 60-minute headways. There is currently no service on Sundays or the following holidays: New Year’s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

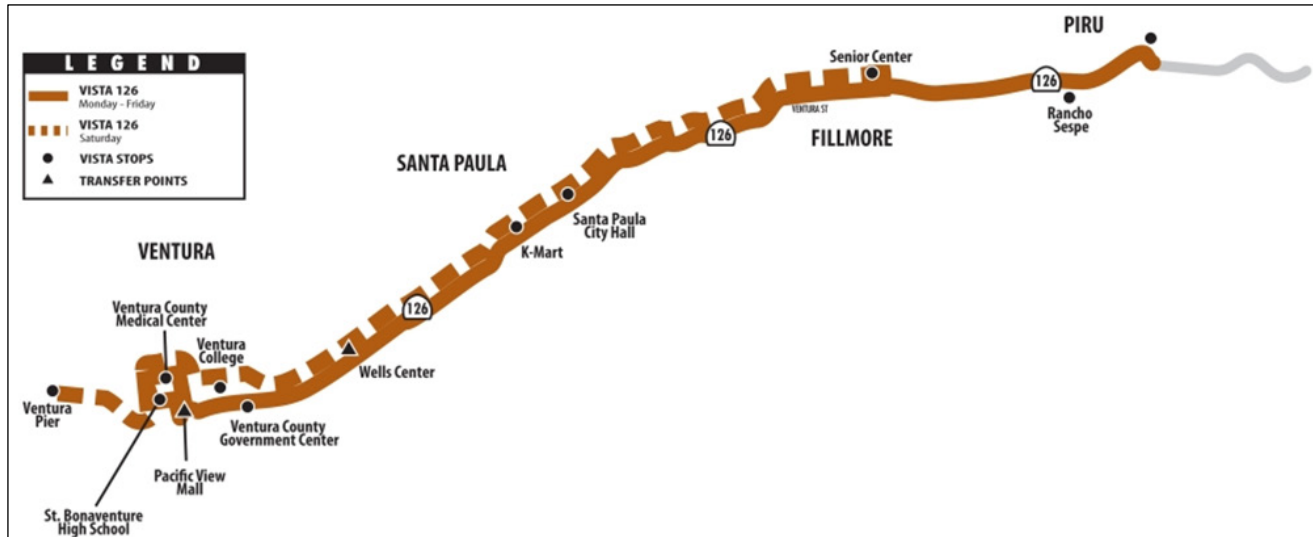


Exhibit 4.17-5 Vista 126 Bus Route

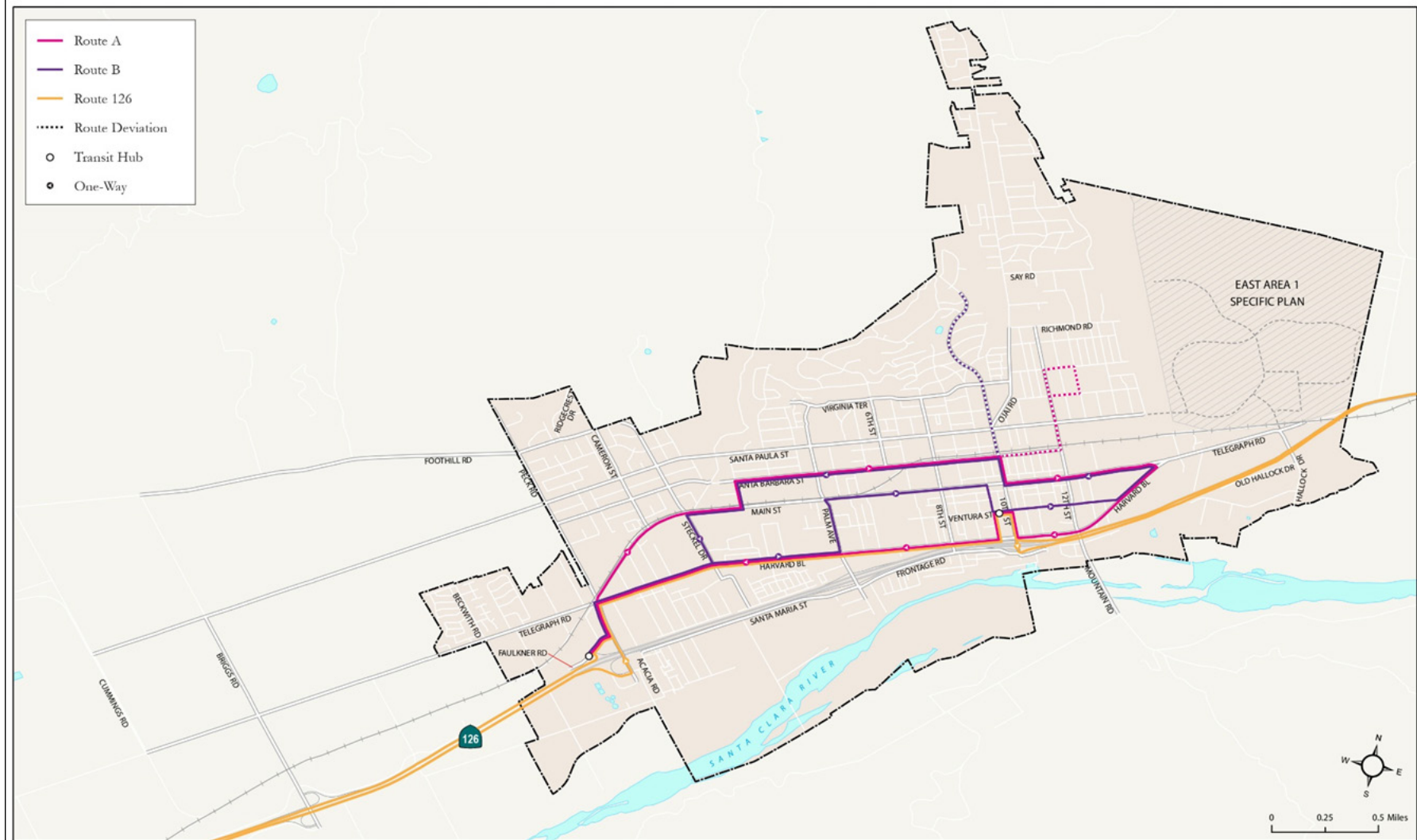


Exhibit 4.17-6 Existing Transit Network within Santa Paula



In addition, VCTC manages local bus service operated under the Valley Express moniker, which serves Santa Paula by way of two fixed-route services: Route A, and Route B (**Exhibit 4.17-7**).

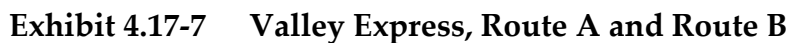
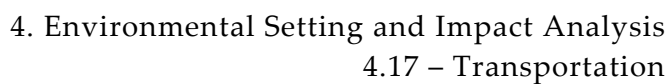
Route A – Runs clockwise and provides deviated service to the northeast portion of the city, near Barbara Webster Elementary School, on an as-needed basis. Route A operates between 6:43 a.m. and 6:45 p.m. on weekdays with approximately 30-minute peak headways, and between 8:00 a.m. and 5:28 p.m. on weekends with approximately 60-minute headways. There is currently no service on the following holidays: New Year’s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Route B – Runs counterclockwise serving Downtown via Main Street and provides deviated service to Santa Paula Hospital on an as-needed basis. Route B operates between 6:31 a.m. and 7:23 p.m. on weekdays with approximately 30-minute peak headways, and between 8:35 a.m. and 4:55 p.m. on weekends with approximately 90-minute headways. There is currently no service on the following holidays: New Year’s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Table 4.17-7 summarizes the locations of Santa Paula Valley Express transit stops and routes served, while **Table 4.17-8** presents Route 126 transit stops within Santa Paula, including the location, amenities, and average daily boardings and alightings in 2014. Ridership statistics were not available for Santa Paula Valley Express routes.

Transit ridership is encouraged throughout Ventura County by a series of VCTC programs including:

- *Reduced Fare Program* – Provides half fare for seniors 65+ or persons with disabilities or Medicare cards who are able to ride VCTC’s fixed routes.
- *Guaranteed Ride Home Program* – Provides a free taxi ride or one-day car rental on days where users carpool, vanpool, ride the bus, or use Metrolink. VCTC’s Guaranteed Ride Home Program may be used up to twice a month if the user encounters an illness, childcare emergency, severe personal crisis, unexpected request to work past regular hours, or when stranded at work due to carpool or vanpool drivers experiencing any of the above.
- *Dial-A-Ride* – Provides service from 6:00 a.m. until 7:30 p.m. Monday through Friday and from 8:00 a.m. until 5:30 p.m. on weekends. Rides are reserved by calling ahead and are available to those with disabilities that prevent them from using the Valley Express fixed-route bus service, or seniors age 65+.



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Table 4.17-7 Santa Paula Valley Express Transit Stop Locations

Location	Cross Streets	Route
K-Mart	Faulkner Road & Peck Road	A, B
Community/Senior Center	W. Main Street & Steckel Drive	A
Chhinas Market	Dean Drive & W. Santa Barbara Street	A
Rodney Fernandez Apartments	Santa Barbara Street near Bradley Street	A
Santa Barbara Street & 4 th Street	Santa Barbara Street & 4 th Street	A
Moose Lodge	Santa Barbara Street near 8 th Street	A
Glen Tavern Inn	Santa Barbara Street & Mill Street	A
Santa Barbara Street & 11 th Street	Santa Barbara Street & 11 th Street	A
12 th Street & Santa Paula Street	12 th Street & Santa Paula Street	A
Las Piedras Park	13 th Street & Orchard Street	A
Our Lady of Guadalupe	12 th Street & Orchard Street	A
Barbara Webster Elementary	12 th Street & Saticoy Street	A
Moreton Bay Fig Tree	10 th Street & Santa Barbara Street	A
Main Street & 11 th Street	E. Main Street & 11 th Street	A
Santa Paula Medical Clinic	E. Main Street & 13 th Street	A
Boys and Girls Club	Harvard Boulevard & Ventura Street	A
Harvard Boulevard & Garcia Street	Harvard Boulevard & Garcia Street	A
Harvard Boulevard & Ojai Street	Harvard Boulevard & Ojai Street	A
City Hall / Veterans Park (Arrival)	Ventura Street & Mill Street	A, B
City Hall / Veterans Park (Departure)	Ventura Street & Mill Street	A, B
Harvard Boulevard & 8 th Street	Harvard Boulevard & 8 th Street	A
Isbell School	Harvard Boulevard & 4 th Street	A
Rite Aid	Harvard Boulevard before Palm Avenue	A
Enterprise	Harvard Boulevard after Palm Avenue (mid-block)	A
Harvard Boulevard & Craig Drive	Harvard Boulevard & Craig Drive	A
Vons Shopping Center	Harvard Boulevard & Steckel Drive	A
Harvard Boulevard & Laurie Lane	Harvard Boulevard & Laurie Lane	A
El Pescador	Peck Road (mid-block)	A, B
Mountain View Mobile Home Park	W. Harvard Boulevard (across Elm Street)	B
Ventura County Public Health	W. Harvard Boulevard & Laurie Lane	B
Teague Park	W. Harvard Boulevard & Steckel Drive	B
DMV	W. Harvard Boulevard before Craig Drive	B
McDonalds	W. Harvard Boulevard before Palm Avenue	B
Rite Aid	Palm Avenue north of Harvard Boulevard	B
Main Street & 4 th Street	Main Street & 4 th Street	B
Union Bank	Main Street & 7 th Street	B
Clock Tower	Main Street & Davis Street	B
Main Street & Mill Street	Main Street & Mill Street	B
Grace Thille School	Ventura Street & Oak Street	B
Boys & Girls Club	Harvard Boulevard & Ventura Street	B
Santa Paula Medical Clinic	E. Main Street & 13 th Street	B
Main Street & 12 th Street	Main Street & 12 th Street	B
Oil Museum	Main Street & Ojai Street	B
10 th Street & Santa Barbara Street	10 th Street & Santa Barbara Street	B



Location	Cross Streets	Route
First Five Pre-K	10 th Street & Railroad Avenue	B
Santa Paula Hospital	Hospital Entrance	B
10 th Street & Virginia Terrace	10 th Street & Virginia Terrace	B
Rose Garden	10 th Street & Railroad Avenue	B
Railroad Plaza Gazebo	Santa Barbara Street & N. Mill Street	B
Santa Barbara Street & 8 th Street	Santa Barbara Street & 8 th Street	B
St. Sebastien	Santa Barbara Street & 4 th Street	B
Rodney Fernandez Apartments	Santa Barbara Street & Bradley Street	B
Dean Drive Medical Center	Dean Drive & March Street	B
Community/Senior Center	Steckel Drive & Main Street	B
Vons Shopping Center	Harvard Boulevard & Cameron Street	B
Ventura County Public Health	Harvard Boulevard & Laurie Lane	B

Source: Chen Ryan Associates, 2019

Table 4.17-8 VCTC Route 126 Existing Transit Stops, Amenities, and Average Daily Boardings and Alightings (2014)

Dir.	Location	Amenities			Route	Boardings	Alightings	Total
		Shelters	Benches	Trash Cans				
W/B	City Hall	✓	✓	✓	126	128	54	182
E/B	City Hall	✓	✓	✓	126	66	88	154
W/B	K-Mart	✓	✓	✓	126	68	19	87
E/B	K-Mart	✓	✓	✓	126	32	55	87
Total								510

Source: Ventura County Transportation Commission, 2016; Chen Ryan Associates, 2019



Pedestrian Mobility

According to the U.S. Census Bureau's 2014 American Community Survey, 1.1% of Santa Paula residents walked to work. The pedestrian commute mode share is displayed by census tract in **Exhibit 4.17-8**. A relatively higher percentage of walking commuters were concentrated in the central portion of Santa Paula as well as in a few areas in the northern and western portions of the city.

Table 4.17-9 presents 2016 AM/PM peak hour pedestrian counts at the study intersections.

The three locations with the highest observed pedestrian volumes are identified below:

AM Peak Hour

- Palm Ave & Harvard Blvd (148)
- Palm Ave & Santa Paula St (137)
- Steckel Dr & Main St (106)

PM Peak Hour

- Palm Ave & Harvard Blvd (108)
- 8th St & Main St (91)
- Steckel Dr & Harvard Blvd (87)

The intersection of Palm Avenue and Harvard Boulevard experienced the highest pedestrian volumes for both AM and PM peak hours. This intersection is close to multiple pedestrian-generating land uses such as bus stops, retail, dining, and commercial services. In addition, the intersection is located approximately 800 feet west of Isbell Middle School, which generates high volumes of pedestrians before and after school.

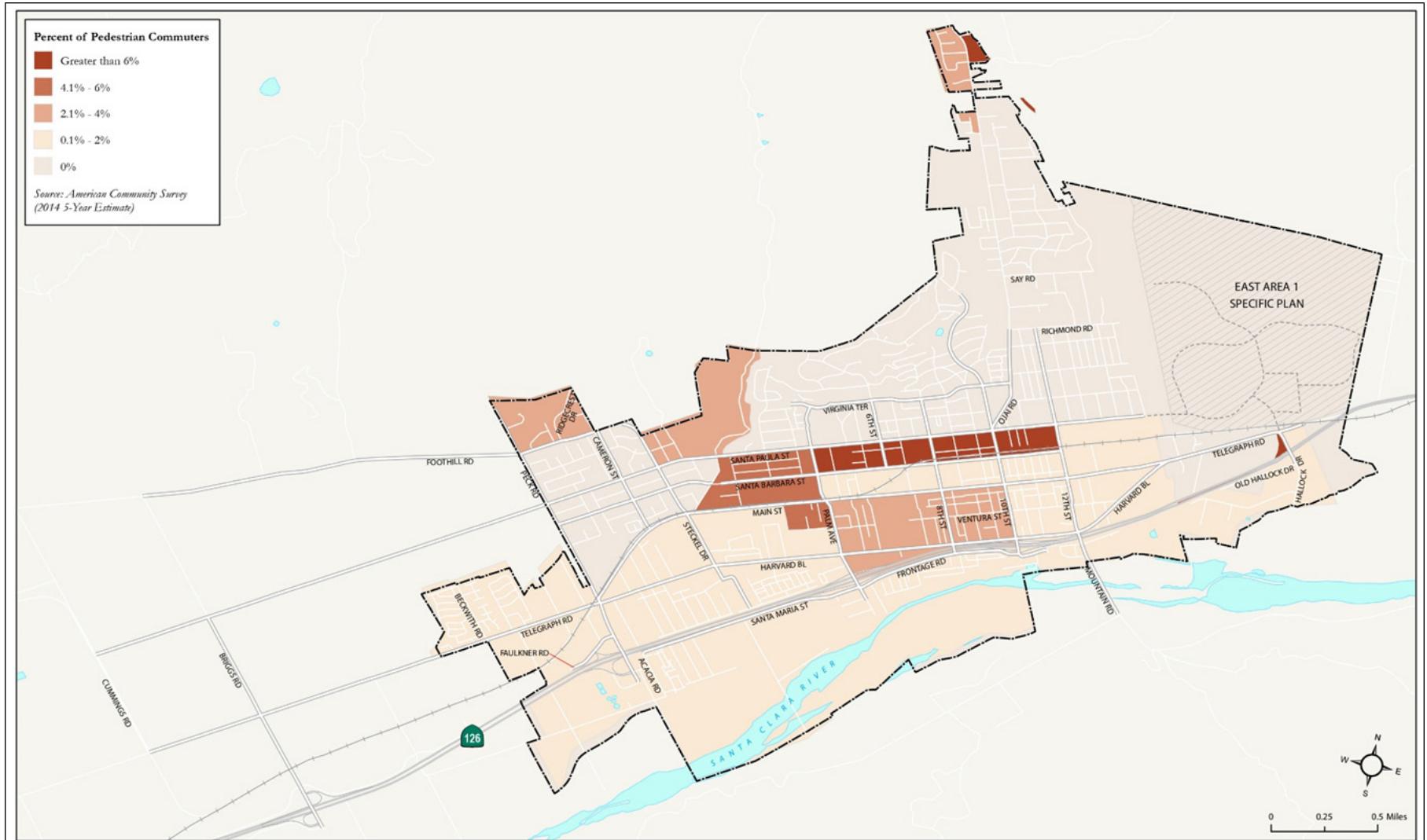


Exhibit 4.17-8 Pedestrian Commuters (2014)

4. Environmental Setting and Impact Analysis
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Table 4.17-9 Peak Hour Pedestrian Counts (2016)

ID	Intersection	AM Peak Hour	PM Peak Hour	Count Date
1	Briggs Road & Telegraph Road	2	0	2/4/2016
2	Briggs Road & SR-126 WB Ramps	0	0	2/4/2016
3	Briggs Road & SR-126 EB Ramps	0	0	2/4/2016
4	Peck Road & Foothill Road	8	13	2/4/2016
5	Peck Road & Santa Paula Street	14	15	2/4/2016
6	Peck Road & Santa Barbara Street	7	14	2/4/2016
7	Peck Road & Main Street	75	13	2/4/2016
8	Peck Road & Telegraph Road	49	40	2/4/2016
9	SR-126 WB Ramps & Faulkner Road	9	4	2/2/2016
10	Peck Road & SR-126 EB Ramps	1	0	2/4/2016
11	Steckel Drive & Main Street	106	43	2/4/2016
12	Steckel Drive & Harvard Boulevard	82	87	2/4/2016
13	Palm Avenue & Santa Paula Street	137	32	2/2/2016
14	Palm Avenue & Santa Barbara Street	98	34	2/2/2016
15	Palm Avenue & Main Street	42	29	2/2/2016
16	Palm Avenue & Harvard Boulevard	148	108	2/2/2016
17	Palm Avenue & SR-126 WB Ramps	10	4	2/2/2016
18	Palm Avenue & SR-126 EB Ramps	1	2	2/2/2016
19	Palm Avenue & Santa Maria Street	2	2	2/2/2016
20	8 th Street & Main Street	74	91	2/2/2016
21	8 th Street & Harvard Boulevard	14	9	2/2/2016
22	Ojai Road & Virginia Terrace	72	19	2/2/2016
23	10 th Street & Santa Paula Street	95	40	2/2/2016
24	10 th Street & Santa Barbara Street	63	52	2/2/2016
25	10 th Street & Main Street	59	71	2/2/2016
26	10 th Street & Harvard Boulevard	7	0	2/2/2016
27	10 th Street & SR-126 WB Ramps	5	0	2/2/2016
28	10 th Street & SR-126 EB Ramps	4	2	2/2/2016
29	10 th Street & Santa Maria Street	2	1	2/2/2016
30	12 th Street & Main Street	24	20	2/2/2016
31	12 th Street & Harvard Boulevard	12	9	2/2/2016
32	Harvard Boulevard & Telegraph Road	5	13	2/2/2016
33	Hallock Drive & Telegraph Road	0	4	2/2/2016
34	Hallock Drive & SR-126	0	0	2/2/2016

Source: Chen Ryan Associates, 2019



Bicycle Mobility

Table 4.17-10 describes the four classifications of bicycle facilities recognized by the California *Streets and Highways Code*, including bike path, bike lane, bike route, and cycle track. **Exhibit 4.17-9** displays the location of existing bicycle facilities, while **Table 4.17-11** summarizes the existing bicycle facility mileage by class in Santa Paula.

Table 4.17-10 California Bikeway Classifications

Class Description	Example
Class I Bikeway (Bike Path) – Also referred to as shared-use paths or multi-use paths, Class I facilities provide a completely separated right-of-way designated for the exclusive use of bicycles and pedestrians with crossflows by motorists minimized. Bike paths can provide connections where roadways are non-existent or unable to support bicycle travel.	
Class II Bikeway (Bike Lane) – Provide a restricted right-of-way designated for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with pedestrian and motorist crossflows permitted.	
Class III Bikeway (Bike Route) – Provides shared use of traffic lanes with motor vehicles, identified by signage and street markings such as "sharrows". Bike routes are best suited for low-speed, low-volume roadways.	
Class IV Bikeway (Cycle Track) – Also referred to as separated bikeways, cycle tracks provide a right-of-way designated exclusively for bicycle travel within the roadway and physically protected from vehicular traffic. Types of separation include, but are not limited to, grade separation, flexible posts, or on-street parking.	

Source: California Streets and Highway Code, 2014; Chen Ryan Associates, 2019



Table 4.17-11 Existing Bicycle Facility Mileage in Santa Paula

Facility Type	Mileage
Class I – Shared-Use Path	1.8
Class II – Bicycle Lane	3.2
Class III – Bicycle Route	0.0
Class IV – Cycle Track	0.0
Total	5.0

Source: Chen Ryan Associates, 2019

As shown in **Table 4.17-11**, there are approximately 5 miles of existing bicycle facilities within Santa Paula. Existing facilities include Class I multi-use paths and Class II bike lanes. The multi-use path runs along Cemetery Road between Santa Paula Street and Main Street, before running parallel to the rail right-of-way to a terminus at the intersection of 12th Street and Santa Barbara Street. The approximately 1.8-mile path provides an east-west connection through the central portion of the city and is within a two-block proximity to many area schools, such as Isbell Middle School, Glen City Elementary School, McKeveatt Elementary School, and Barbara Webster Elementary School.

Class II bike lanes are the primary type of existing bicycle facility in Santa Paula, providing connections between residential neighborhoods, schools, parks and recreational facilities, commercial, and retail uses. As future improvements are considered, Santa Paula's strong grid network presents an opportunity to strengthen the bicycle network and improve connectivity to currently unserved portions of the community.

As previously shown in **Exhibit 4.17-1**, just 0.8% of Santa Paula residents bike to work, representing the lowest mode share of commuters. The bicycle commute mode share is displayed by census tract in **Exhibit 4.17-10**. Relatively higher bicycle commute mode shares were seen in census tracts located in the central portion of the city. These census tracts are also in close proximity to a variety of land uses and multiple public bus routes, which support active transportation.

Table 4.17-12 presents the AM/PM peak hour bicycle counts conducted in 2016 at the study intersections. **Exhibit 4.17-11** and **Exhibit 4.17-12** display the distribution of bicycle volumes for the AM and PM peak hours, respectively, across the Santa Paula study area. Intersections with the highest observed AM and PM bicycle volumes are as follows:

AM Bicycle Volume

- Steckel Dr & Main St (6)
- 10th St/SR-126 EB Ramps & E Santa Maria St (5)
- 10th St & Harvard Blvd (3)
- 10th St & Santa Barbara St (3)

PM Bicycle Volume

- Steckel Dr & Harvard Blvd (9)
- 10th St & Main St (9)
- Steckel Dr & Main St (8)

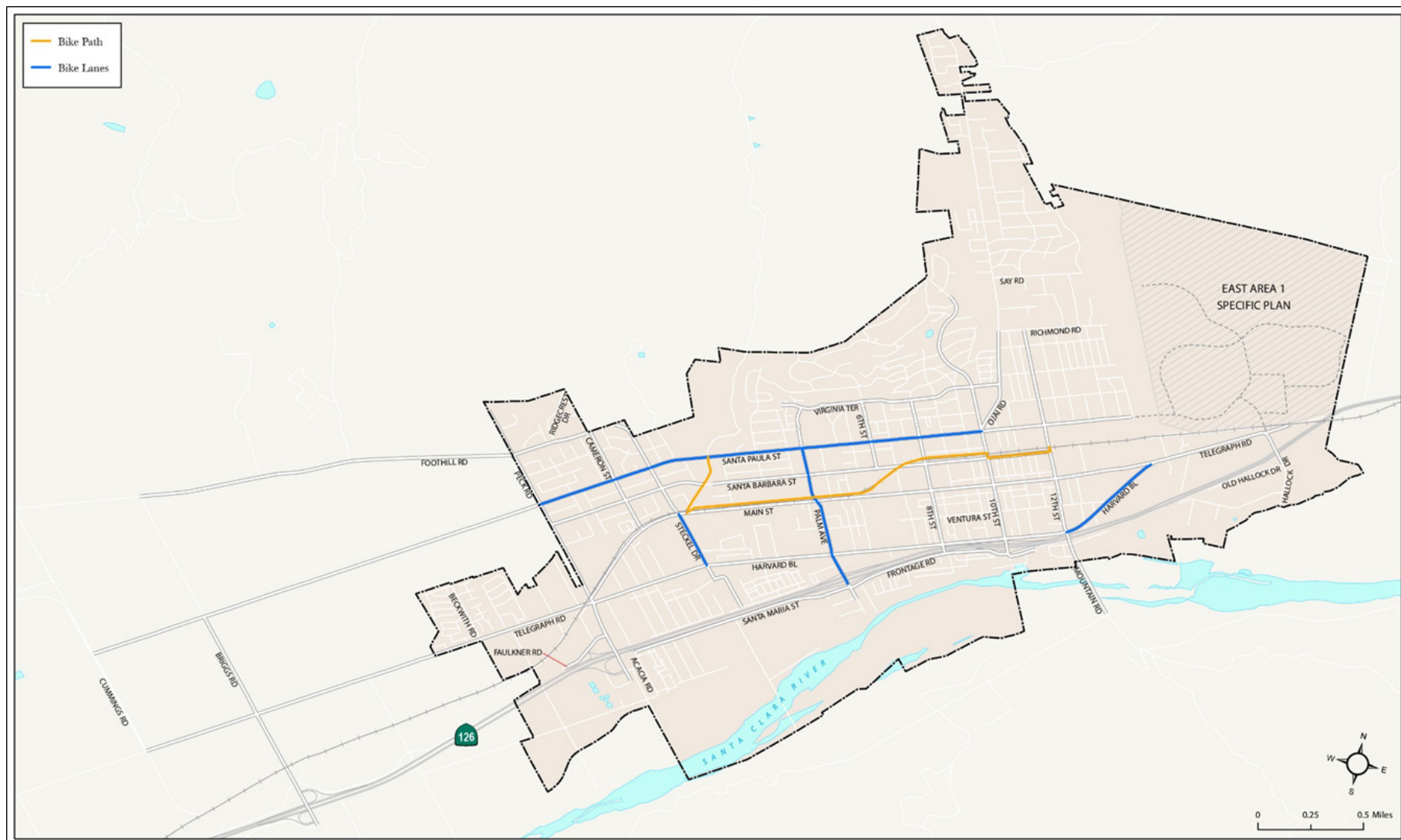


Exhibit 4.17-9 Existing Bicycle Facilities

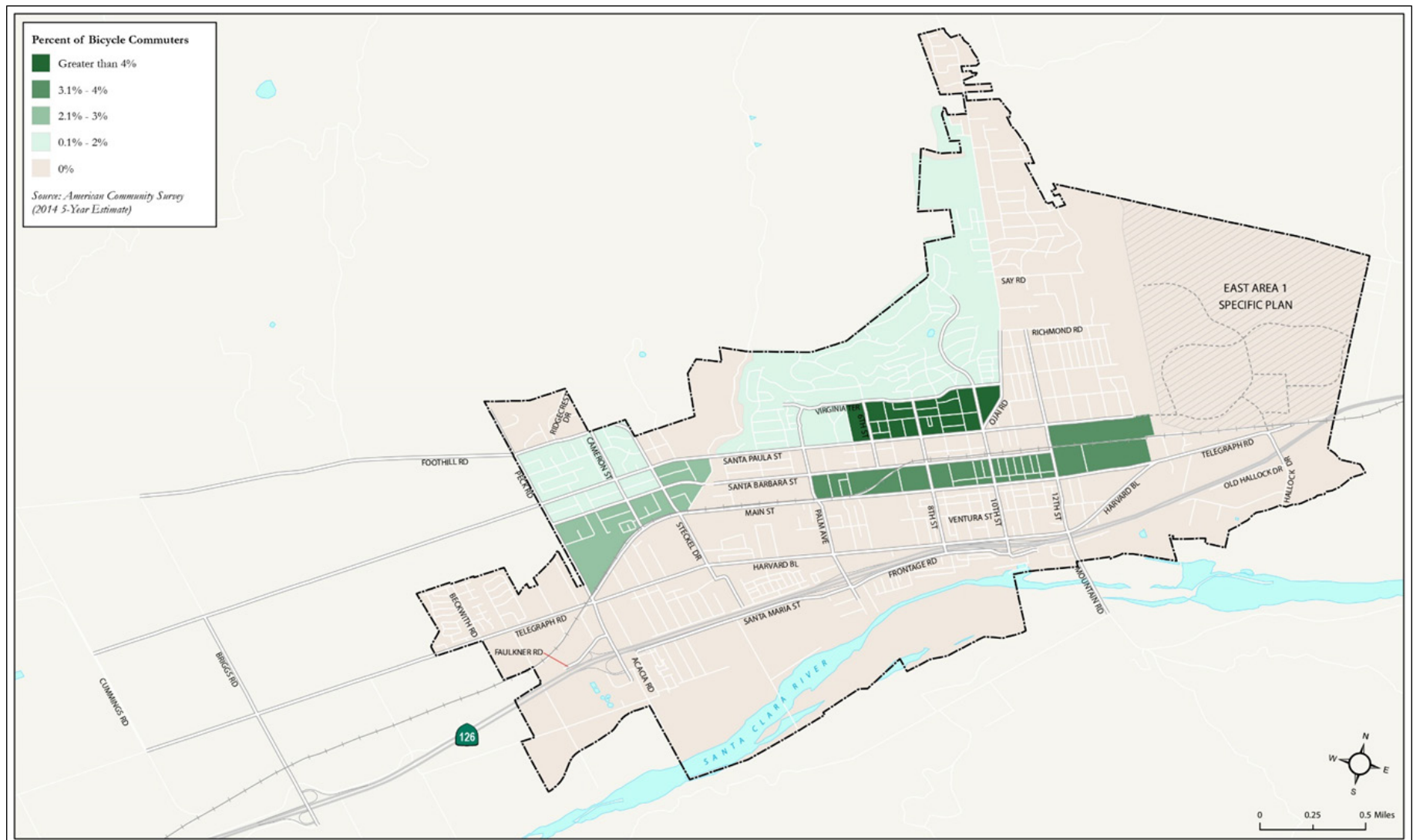


Exhibit 4.17-10 Bicycle Commuting (2014)

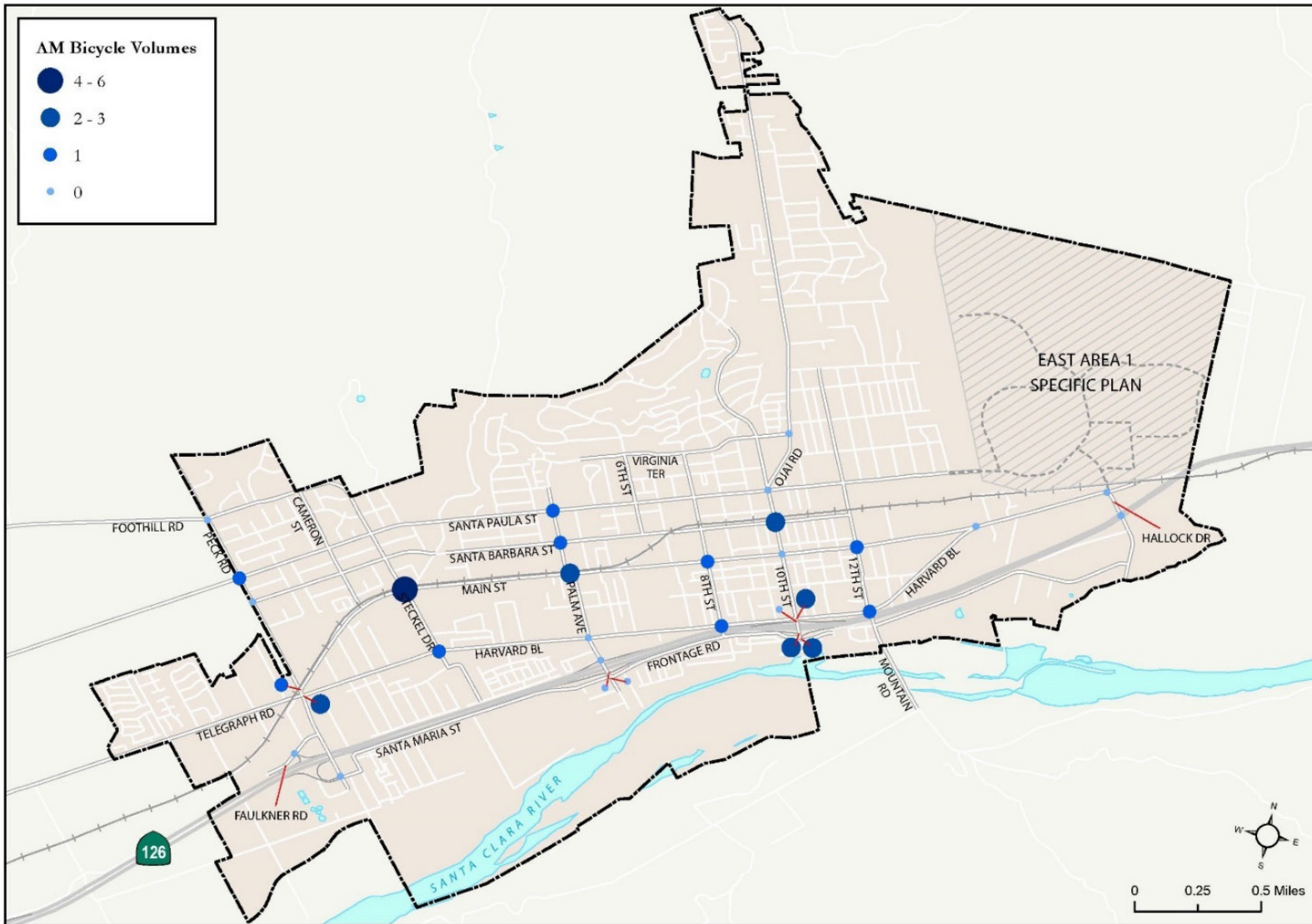


Exhibit 4.17-11 Existing AM Bicycle Volumes (2016)

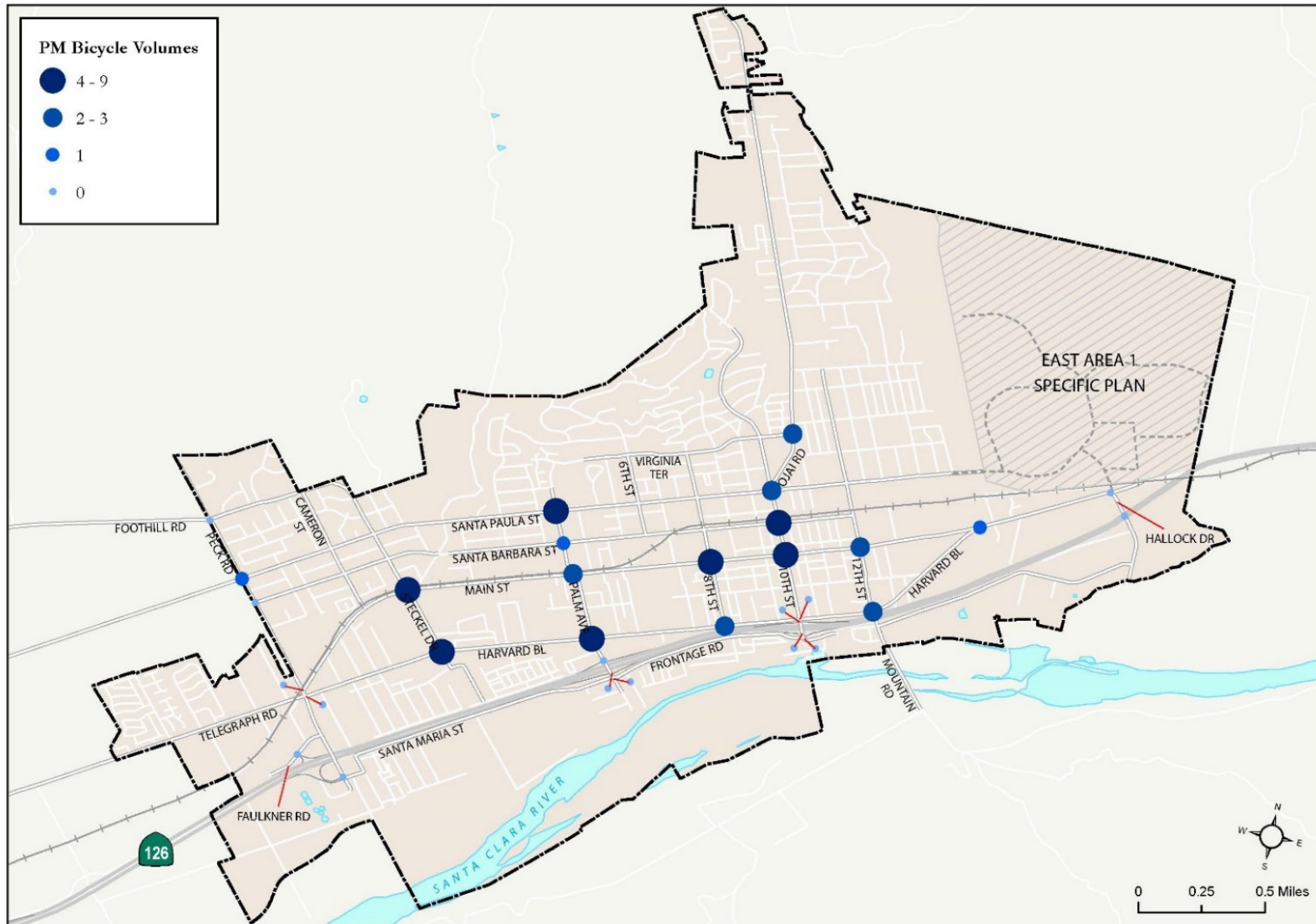


Exhibit 4.17-12 Existing PM Bicycle Volumes (2016)



Table 4.17-12 Existing AM/PM Peak Hour Bicycle Counts (2016)

ID	Intersection	AM Count	PM Count	Count Date
1	Briggs Road & Telegraph Road	0	2	2/4/2016
2	Briggs Road & SR-126 WB Ramps	0	0	2/4/2016
3	Briggs Road & SR-126 EB Ramps	0	0	2/4/2016
4	Peck Road & Foothill Road	0	0	2/4/2016
5	Peck Road & Santa Paula Street	1	1	2/4/2016
6	Peck Road & Santa Barbara Street	0	0	2/4/2016
7	Peck Road & Main Street	1	0	2/4/2016
8	Peck Road & Telegraph Road	2	0	2/4/2016
9	SR-126 WB Ramps & Faulkner Road	0	0	2/2/2016
10	Peck Road & SR-126 EB Ramps	0	0	2/4/2016
11	Steckel Drive & Main Street	6	8	2/4/2016
12	Steckel Drive & Harvard Boulevard	1	9	2/4/2016
13	Palm Avenue & Santa Paula Street	1	4	2/2/2016
14	Palm Avenue & Santa Barbara Street	1	1	2/2/2016
15	Palm Avenue & Main Street	2	2	2/2/2016
16	Palm Avenue & Harvard Boulevard	0	6	2/2/2016
17	Palm Avenue & SR-126 WB Ramps	0	0	2/2/2016
18	Palm Avenue & SR-126 EB Ramps / Santa Maria Street	0	0	2/2/2016
19	Palm Avenue & Santa Maria Street	0	0	2/2/2016
20	8 th Street & Main Street	1	4	2/2/2016
21	8 th Street & Harvard Boulevard	1	2	2/2/2016
22	Ojai Road & Virginia Terrace	0	3	2/2/2016
23	10 th Street & Santa Paula Street	0	2	2/2/2016
24	10 th Street & Santa Barbara Street	3	5	2/2/2016
25	10 th Street & Main Street	0	9	2/2/2016
26	10 th Street & Harvard Boulevard	3	0	2/2/2016
27	10 th Street & SR-126 WB Ramps	0	0	2/2/2016
28	10 th Street & SR-126 EB Off-Ramp	3	0	2/2/2016
29	10 th Street/E Santa Maria Street & E Santa Maria Street/SR-126 EB On-Ramp	3	0	2/2/2016
30	12 th Street & Main Street	1	2	2/2/2016
31	12 th Street & Harvard Boulevard	1	2	2/2/2016
32	Harvard Boulevard & Telegraph Road	0	5	2/2/2016
33	Hallock Drive & Telegraph Road	0	0	2/2/2016
34	Hallock Drive & SR-126	0	0	2/2/2016

Source: Chen Ryan Associates; 2019



Goods Movement and Truck Routes

Exhibit 4.17-13 displays existing designated truck routes within Santa Paula. Truck route designated streets include:

North-South Streets

- Peck Road from Foothill Road to Corporation Street
- Dean Drive from Santa Barbara Street to Main Street
- Palm Avenue from Main Street to Santa Maria Street
- 10th Street from Santa Paula Street to SR-126
- SR-150/Ojai Road from Santa Paula Street to City limits
- 12th Street from Santa Paula Street to South Mountain Road

East-West Streets

- Foothill Road from west of City limits to Peck Road
- Santa Paula Street from west of City limits to Peck Road
- Santa Paula Street from 10th Street to eastern terminus
- Santa Barbara Street from Dean Drive to 12th Street
- Main Street from Peck Road to Palm Avenue
- Main Street from 10th Street to Harvard Boulevard
- Telegraph Road from west of City limits to Peck Road
- Telegraph Road from Harvard Boulevard to City limits
- Harvard Boulevard from Peck Road to Telegraph Road
- Santa Maria Street from Santa Paula Airport to Palm Avenue

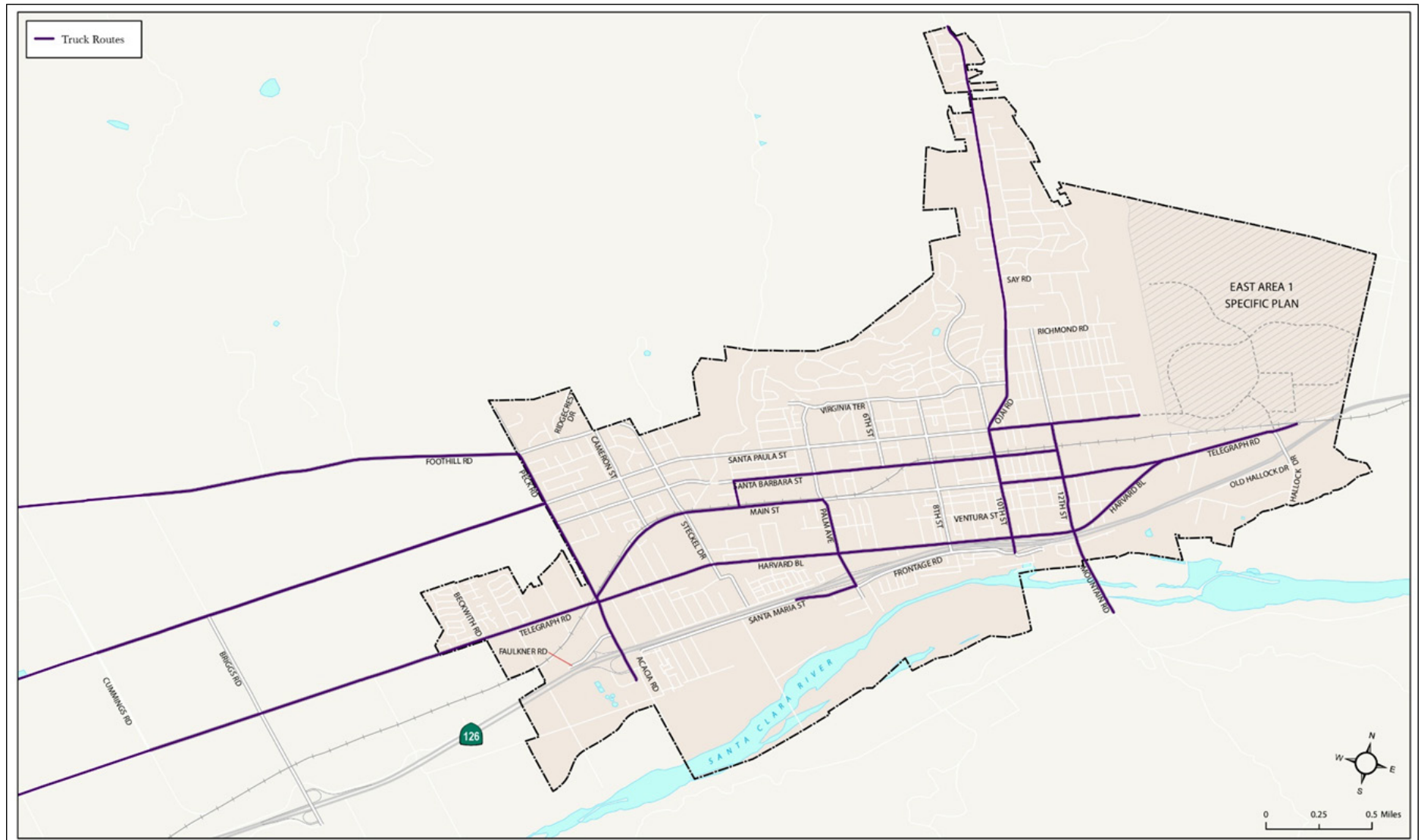


Exhibit 4.17-13 Existing Truck Routes



Regulatory Framework

State

Over the past decade, several key planning initiatives and legislative actions at the state and regional level have redefined the way local transportation planning is carried out. Examples include Assembly Bill 1358 – the Complete Streets Act, Senate Bill 375 – Sustainable Communities and Climate Protection Act, Senate Bill 743 – Environmental Quality, and the Southern California Association of Governments (SCAG) Sustainability Program.

Complete Streets (AB 1358 of 2008) requires cities and counties to plan for a balanced, multi-modal transportation network that meets the needs of all users of streets, roads, and highways. “All users” includes motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and public transportation riders in a manner that is suitable to the rural, suburban, or urban context of the general plan.

SB 375 of 2008 requires metropolitan planning organizations (MPOs) to formulate a “sustainable community strategy” (SCS) as part of their regional transportation plans (RTP). The SCS serves to specifically identify how the region will achieve targeted reductions in greenhouse gas emissions from automobiles and light trucks. In 2016 SCAG’s Regional Council adopted the 2016-2040 RTP/SCS, with a vision encompassing three principles identified as key to the region’s future: mobility, economy, and sustainability. The RTP/SCS outlines a plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands, with particular emphasis paid to designated High Quality Transit Areas (HQTAs). Although no current or planned HQTAs exist in Santa Paula or its Sphere of Influence, the RTP/SCS maintains relevance through its connection to land use patterns as prescribed by local jurisdictions, ensuring consistency between local planning documents such as the Santa Paula General Plan and regional plans, policies, and implementation strategies.

SB 743 of 2013 made several changes to California Environmental Quality Act (CEQA) procedures for projects located in areas targeted for transit-oriented development. SB 743 changed transportation impact analyses under CEQA by replacing automobile delay and level of service (LOS) with vehicle miles traveled (VMT) as the basis for determining significant impacts. Additionally, a project’s aesthetic and parking impacts are no longer considered significant impacts if the project is located on an infill site within a transit priority area. According to the legislative intent stated in SB 743, these changes to current practice will accomplish the following:



- Ensure that the environmental impacts of traffic, such as noise, air pollution, and safety concerns, continue to be properly addressed and mitigated through CEQA; and
- More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

SB 743 requires the Governor’s Office of Planning and Research (OPR) to amend the CEQA Guidelines for evaluating transportation impacts. The *CEQA Guidelines* were amended in December 2018 to reflect these changes, which will become mandatory for lead agencies in July 2020.

California Active Transportation Program (ATP) consolidates several federal and statewide programs such as the Bicycle Transportation Account (BTA) and Safe Routes to School (SR2S). The ATP program provides a source of funding for countywide projects that support programs and infrastructure improvements that encourage walking and biking. Funding is administered by Caltrans through an annual, competitive Call for Projects application process.

An important unifying theme among the initiatives described above is to achieve a more balanced, multi-modal transportation system that provides travel options for motorists, pedestrians, bicyclists, and transit users.

Regional

Southern California Association of Governments (SCAG). SCAG is the federally-designated Metropolitan Planning Organization (MPO) for the 6-county region that includes Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura counties. Pursuant to SB 375, SCAG’s 2016-2040 RTP/SCS establishes the transportation planning framework for the SCAG region.

Ventura County Transportation Commission (VCTC). A number of VCTC planning documents guide transportation planning in Santa Paula, including:

Updated Ventura County Coordinated Public Transit-Human Services Transportation Plan (2017) – This document augments the extensive work completed in VCTC’s original 2007 Plan. As with the 2007 Plan, the 2017 Update documents the transportation needs for individuals with disabilities, older adults, and people with low incomes. It also reports on the status of implementing the original Plan’s recommendations.

Bicycle Wayfinding Plan (2017) – VCTC developed the Bicycle Wayfinding Plan to help improve the convenience and safety of people traveling by bike in Ventura County. Prepared



collaboratively with County and municipal agencies, stakeholder groups and the general public, this plan serves as a toolkit for the development of a regional wayfinding network.

Assessment of Annual Transportation Development Act (2014) – VCTC led a review of the existing Unmet Transit Needs definitions and process with the goal of creating recommendations for improvements.

Comprehensive Transportation Plan (CTP) (2013) – The CTP is a long-range policy document, built from community-based, local priorities and community-expressed need to enhance regional connections. It is aimed at ensuring mobility and enhancing the quality of life for all Ventura County residents. The CTP also examines funding strategies and options from the federal, state, regional and local levels. It is intended to provide a framework for future community-based planning and collaboration and inform Ventura County’s long-range transportation decisions.

The CTP serves as a regional-local bridge between SCAG and City policies, and supports these documents at the countywide level. VCTC identifies the following actionable items that will facilitate implementation of the CTP in Santa Paula and neighboring jurisdictions, as they pertain to the roadway environment:

- Outcome 1: Status Quo, Action 4 - Reevaluate VCTC’s Highway Project Priority List and project funding process to ensure those projects with the greatest value to the County, on needs-based criteria, receive funding.
- Outcome 2: Community Connections, Action 1 – Conduct corridor studies on Ventura County’s major transportation routes (US 101, SR 118, SR 126) to determine the best return on investments in improved connectivity.
- Outcome 2: Community Connections, Action 3 - Continue collaborating with local jurisdictions, interest groups, agencies, and transit operators and provide the needed regional planning, funding, and policy support for implementing improved connectivity among all modes, including customer service objectives contained in the Regional Transit Study.

Heritage Valley Transit System Study (2013) – The Heritage Valley Transit System Study is a blueprint for the future of local transit services in the cities of Santa Paula and Fillmore, the community of Piru, and the surrounding environs.

Ventura County Congestion Management Program (2009) – VCTC, as the designated Congestion Management Authority (CMA) for Ventura County, is responsible for coordinating land use, transportation planning, and air quality to mitigate traffic congestion. Every two years, VCTC prepares an updated Ventura County Congestion Management Program (CMP) to provide local government agencies and private developers with the



resources necessary to positively impact traffic congestion throughout Ventura County. The CMP identifies the following policies and objectives that aid jurisdictions such as Santa Paula in maintaining a robust, well-performing roadway network:

Policies

- Policy B - Transportation planning and analysis should be consistent throughout the County.
- Policy F - The California Department of Transportation (Caltrans) should assist local governments in managing congestion on the state highway system.
- Policy K - When feasible, Ventura County residents should have access to all modes of travel.

Objectives

- Objective 2 – Improve jurisdictional coordination to ensure consistent consideration, analysis and mitigation of the impacts of the local development on the regional transportation system.
- Objective 8 – Minimize traffic congestion in Ventura County.
- Objective 9 – Minimize use of the existing roadway network through demand management strategies
- Objective 16 – Improve traffic management through the use of technology and regional cooperation.

Transit Investment Study (2008) – VCTC began a process whereby transit needs as identified by Ventura County residents and transit operators alike were prioritized. A key finding arising from this study was a strong desire for better coordination among the nine transit operators within the county. The Transit Investment Study documents existing conditions countywide, prioritizes transit projects, and sets forth criteria for evaluating future transit needs.

Ventura Countywide Bicycle Master Plan (2007) – The Bicycle Master Plan provides a blueprint for bicycle transportation and recreation in Ventura County. The Plan provides an updated countywide system of bike paths, bike lanes, bike routes, and “Share the Road” designations, identifies necessary support facilities such as bicycle parking, and recommends a variety of programs and policies to allow for safe, efficient and convenient bicycle travel within and between the communities of Ventura County and connections to outside the county.



City of Santa Paula

General Plan Circulation Element (current). The current Circulation Element, originally adopted in 1998 and most recently amended in 2013, establishes goals, objectives, policies and implementation measures related to transportation. LOS C is currently the minimum acceptable standard for City streets and intersections. The proposed 2040 General Plan would revise that standard from LOS C to LOS D, consistent with standards adopted by Ventura County and Caltrans for streets and intersections in the Santa Paula area.

Santa Paula Municipal Code. The Municipal Code includes regulations related to transportation in Title VII (Traffic Code), and Chapters 160 (Development Impact Fees), 16.46 (Off-Street Parking and Loading), 16.80 (Subdivision Regulations), and 16.108 (Transportation Demand Management) of Title XVI (Development Code). Other Development Code sections also establish land use regulations for particular zones that relate to transportation. Title IX, Chapter 96 (Streets and Sidewalks), Sec. 96.35 requires that any encroachment into the public right-of-way, including temporary construction, must provide and maintain safety devices, including but not limited to lights, barricades, signs, and watchmen as necessary to protect the public.

Santa Paula Standard Plans. The City Public Works Department has adopted Standard Plans¹⁶⁵ that include street and traffic construction standards, including requirements for preparation of traffic control plans for work done in the public-right-of-way.

4.17-2 Thresholds of Significance

As discussed in the Notice of Preparation (**Appendix A**) and in the Regulatory Setting above, SB743 (2013) created a process to change the way transportation impacts are analyzed under CEQA. This law required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Under SB 743 measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." In December 2018 the State Resources Agency amended the *CEQA Guidelines* to reflect SB 743 and the new regulations will become mandatory in July 2020. Under SB 743, auto delay (i.e., LOS) is no longer considered a significant impact under CEQA.

In accordance with Appendix G of the CEQA Guidelines, the 2040 General Plan would be considered to have a significant impact if it would cause any of the following to occur:

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; (Impacts T-1, T-2 and T-3)
- b) Conflict or be inconsistent with CEQA Guidelines §15064.3(b); (Impact T-4)

¹⁶⁵ <http://www.ci.santa-paula.ca.us/PubWorks/StandardPlans2009.pdf>



- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); (Impact T-5)
- d) Result in inadequate emergency access (Impact T-6)

4.17-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to transportation expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The analysis in this section is based upon the technical study provided in **Appendix D**. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**, page [3-3](#)), while the geographic scope for cumulative impacts is the entire SCAG region.

T-1: Conflicts with a program, plan, ordinance or policy addressing roadways

Impact Discussion

Project Impacts. This section summarizes potential conflicts that could result from the 2040 General Plan vis-à-vis applicable plans, policies and regulations. The analysis is based upon the results of the travel demand forecasting process, which estimated traffic conditions in the 2040 General Plan horizon year. The analysis was conducted using the Ventura County Transportation Model (VCTM), which is based upon SCAG's Regional Transportation Model. The City's modeling process was coordinated with VCTC to ensure consistency with the VCTM update and the Ventura County 2040 General Plan Update, which were underway at the time this EIR was prepared.

A technical discussion of the analysis is provided in **Appendix D**. The focus of the analysis is whether future development as anticipated in the 2040 General Plan horizon year would conflict with adopted standards for streets and highways as discussed above in the Regulatory Setting section.

The analysis compares projected traffic conditions in 2040 to existing conditions (2016). Land use and demographic data used in the analysis assume development consistent with the proposed 2040 General Plan and the regional growth forecast adopted by SCAG as part of the 2016-2040 RTP/SCS, as discussed in **Chapter 2**.

The analysis also assumes completion of the proposed roadway network (**Exhibit 4.17-14**) as proposed in the 2040 Circulation and Mobility Element. Existing roadway configurations and planned classifications proposed as part of the 2040 General Plan are shown in **Table 4.17-13**. Changes proposed for the 2040 circulation network are summarized as follows:

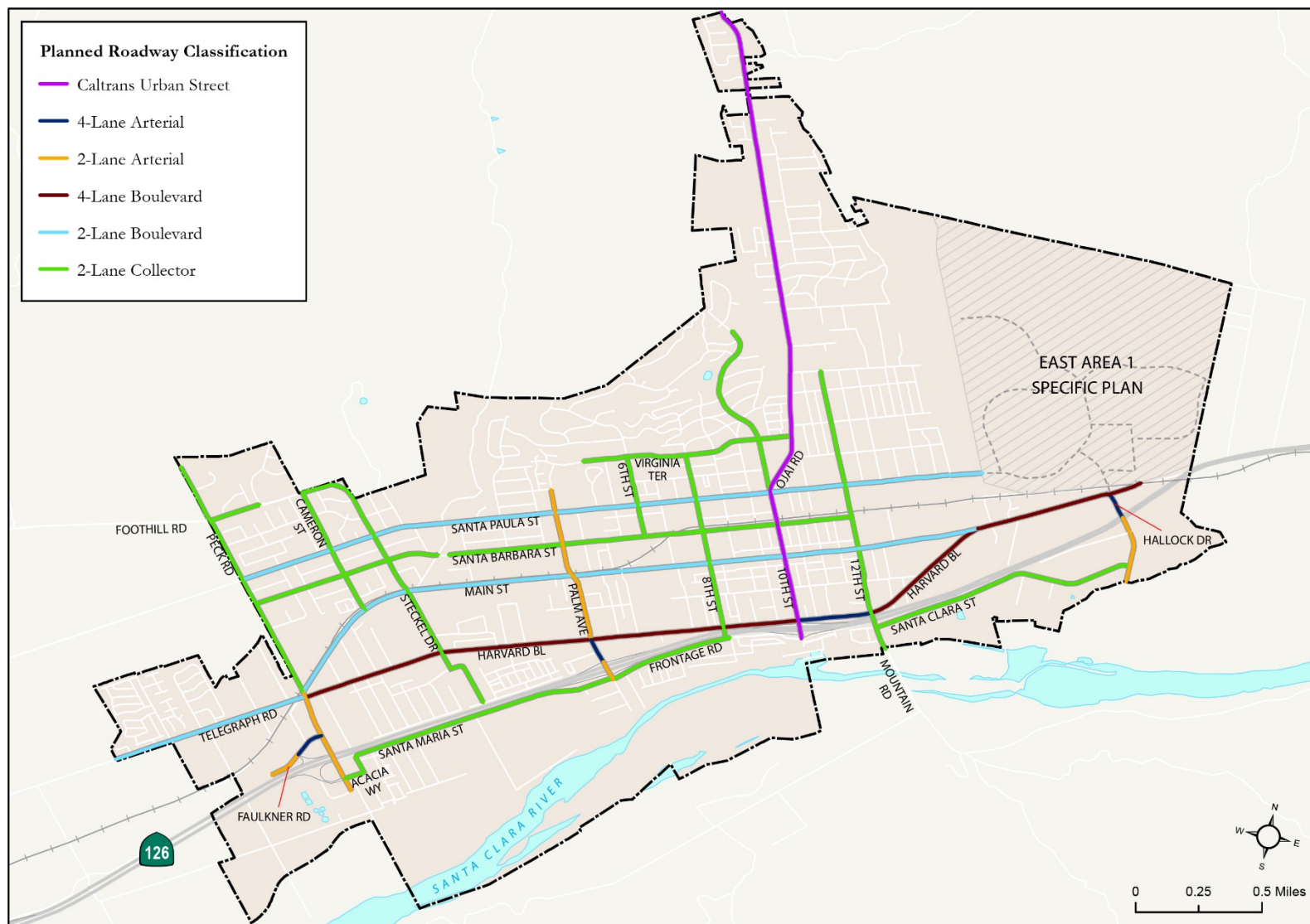


Exhibit 4.17-14 Proposed Roadway Classifications (2040 General Plan)



Table 4.17-13 Existing Conditions vs. Planned Roadway Classifications

Roadway	Segment	Existing (2016) Configuration	Planned Classification	Description	Implementation Requirements
Peck Road	From northern terminus to Main Street	2-lane arterial	2-lane collector	Downgraded to Collector due to excess capacity and residential land uses.	No changes required
	From Main Street to southern terminus	2-lane arterial	2-lane arterial	No change	No changes required
Cameron Street	From Foothill Road to Main Street	2-lane collector	2-lane collector	No change	No changes required
Steckel Drive	From Foothill Road to southern terminus	2-lane collector	2-lane collector	No change	No changes required
Palm Avenue	From northern terminus to Harvard Boulevard	2-lane arterial	2-lane arterial	No change	No changes required
	From Harvard Boulevard to SR 126 WB ramps	2-lane arterial	4-lane arterial	Widened to 4 lanes	Widen roadway to 64 feet and restripe as 4-lanes with center left-turn lane
	From SR 126 WB ramps to southern terminus	2-lane arterial	2-lane arterial	No change	No changes required
6 th Street	From Virginia Terrace to Santa Barbara Street	2-lane collector	2-lane collector	No change	No changes required
8 th Street	From Virginia Terrace to Santa Maria Street	2-lane collector	2-lane collector	No change	No changes required
10 th Street	From northern terminus to Santa Paula Street	2-lane collector	2-lane collector	No change	No changes required
10 th Street / SR 150	From Santa Paula Street to Santa Maria Street	2-lane Caltrans urban street	2-lane Caltrans urban street	No change	No changes required
Ojai Road / SR 150	From northern City limit to Santa Paula Street	2-lane Caltrans urban street	2-lane Caltrans urban street	No change	No changes required
12 th Street	From Richmond Road to Main Street	2-lane collector	2-lane collector	No change	No changes required
	From Main Street to Harvard Boulevard	2-lane arterial	2-lane collector	Downgraded to Collector based upon excess capacity and the redefinition of Collector as a freeway-serving roadway.	No changes required
S. Mountain Road	From Harvard Boulevard to City limit	2-lane arterial	2-lane arterial	No change	No changes required



Roadway	Segment	Existing (2016) Configuration	Planned Classification	Description	Implementation Requirements
Hallock Drive	From Telegraph Road to SR 126	4-lane arterial	4-lane arterial	No change	No changes required
	From SR 126 to Old Hallock Drive	3-lane arterial	2-lane arterial	Redefined as 2-lane roadway based upon excess capacity.	Restripe as 2-lane roadway with on-street parking or shoulder if desired.
	From Old Hallock Drive to southern terminus	2-lane arterial	2-lane arterial	No change	No changes required
Foothill Road	From western City limit to Ridgecrest Drive	2-lane collector	2-lane collector	No change	No changes required
Virginia Terrace	From western terminus to Ojai Road	2-lane collector	2-lane collector	No change	No changes required
Santa Paula Street	From western City limit to Santa Paula Creek	2-lane collector	2-lane boulevard	Upgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 2-lane roadway with buffered Class II bike lanes or Class IV cycle track. Additional width can accommodate on-street parking.
Santa Barbara Street	From Peck Road to 12 th Street	2-lane collector	2-lane collector	No change	No changes required
Telegraph Road	From western City limit to Peck Road	2-lane arterial	2-lane boulevard	Downgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 2-lane roadway with buffered Class II bike lanes or Class IV cycle track. Additional width can accommodate on-street parking.
	From Main Street/ Harvard Boulevard to 850 feet east of Main Street/Harvard Boulevard	4-lane arterial	4-lane boulevard	Downgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Widen to 68 feet and restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes or Class IV cycle track. No parking is recommended.
	From 850 feet east of Main Street to eastern terminus	2-lane arterial	4-lane boulevard	Upgraded to Boulevard and widened to 4 lanes to reflect the roadway's importance in providing east-west multimodal connectivity.	Widen to 68 feet and restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes or Class IV cycle track, as desired by City. No parking is recommended.
Main Street	From Peck Road to Steckel Drive	2-lane arterial (Peck to Lucada) 3-lane arterial (Lucada to Laurie) 4-lane arterial (Laurie to Steckel)	2-lane boulevard	Downgraded to 2-Lane Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 2-lane roadway with on-street parking.



Roadway	Segment	Existing (2016) Configuration	Planned Classification	Description	Implementation Requirements
	From Steckel Drive to Harvard Boulevard	2-lane arterial	2-lane boulevard	Downgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 2-lane roadway with on-street parking.
Harvard Boulevard	From Peck Road to 10 th Street	4-lane arterial	4-lane boulevard	Downgraded to Boulevard to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes and on-street parking where width permits.
	From 10 th Street to 12 th Street	2-lane arterial	4-lane arterial	Widened to 4 Lanes.	Widen roadway to 44 feet and restripe as 4-lanes (Option for 3-Lane Boulevard with center left-turn lane). No parking is recommended.
	From 12 th Street to 440 feet west of Main Street	2-lane arterial	4-lane boulevard	Upgraded to Arterial and widened to 4 lanes to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes or Class IV cycle track, as desired by City. One lane of parking where width permits on the north side.
	From 440 feet west of Main Street to Main Street	3-lane arterial	4-lane boulevard	Upgraded to Arterial and widened to 4 lanes to reflect the roadway's importance in providing east-west multimodal connectivity.	Restripe as 4-lane roadway with center left-turn lane and buffered Class II bike lanes or Class IV cycle track, as desired by City. One lane of parking where width permits on the north side.
Faulkner Road	From end to SR 126 WB ramps	2-lane arterial	2-lane arterial	No change	No changes required
	From SR 126 WB ramps to Peck Road	4-lane arterial	4-lane arterial	No change	No changes required
Santa Maria Street	From Acacia Road to eastern terminus (airport parking lot)	2-lane collector	2-lane collector	No change	No changes required



Roadways

The only roadway segments where widening and/or right-of-way acquisition are planned are the following:

- Palm Avenue between Harvard Boulevard and SR-126
- Telegraph Avenue east of the Main Street/Harvard Boulevard “Y”
- Harvard Boulevard between 10th and 12th Streets

Road segments where the Plan calls for restriping or other changes within the existing right-of-way include the following:

- Hallock Drive from SR-126 to Old Hallock Drive
- Santa Paula Street from the western City limit to Santa Paula Creek
- Telegraph Road from the western City limit to Peck Road
- Main Street from Peck Road to Harvard Boulevard
- Harvard Boulevard from Peck Road to 10th Street and from 12th Street to Main Street

Intersections

The Plan calls for traffic signals to be added at the following intersections:

- Faulkner Road & SR-126 WB Ramps
- Peck Road & SR-126 EB Ramps/Acacia Way
- Palm Avenue & SR-126 EB Ramps
- SR-150/Ojai Road & Virginia Terrace
- SR-150/10th Street & SR-126 WB Ramps
- E. Santa Maria Street & SR-126 EB On-Ramp/10th Street
- Telegraph Road & Hallock Drive

Level of Service (LOS) Standards

The current Circulation Element (Policy 1.a.a) of the Santa Paula General Plan establishes LOS C (weekday P.M. peak period) as the minimum acceptable standard for City streets and intersections. The 2040 General Plan would revise this standard from LOS C to LOS D. This change would be considered to have a significant impact if it conflicts with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Applicable plans, ordinances and policies related to measures of effectiveness are discussed in the Regulatory Framework section above and are summarized below:



California General Plan Law

Government Code §65302 requires that “The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals. The plan shall include the following elements.” Section 65302(b) establishes the following specific requirements for circulation elements:

- (b)(1) A circulation element consisting of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, any military airports and ports, and other local public utilities and facilities, all correlated with the land use element of the plan.
- (2)(A) Commencing January 1, 2011, upon any substantive revision of the circulation element, the legislative body shall modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the general plan.
- (B) For purposes of this paragraph, “users of streets, roads, and highways” means bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors.

The proposed change to the City’s level of service policy from LOS C to LOS D would facilitate the development of a multimodal transportation network correlated with the Land Use Element and meeting the needs of all users of streets in a manner that is suitable to the context of the General Plan. Therefore, this change would not conflict with State general plan law.

California Environmental Quality Act

As noted in the Regulatory Setting above, SB 743 of 2013 created a process to change the way transportation impacts are analyzed under CEQA. The law requires that the CEQA Guidelines be amended to provide an alternative to LOS for evaluating transportation impacts. Once the Guidelines are amended to include alternative criteria, auto delay (i.e., LOS) will no longer be considered a significant impact under CEQA.

Because amendments to the CEQA Guidelines had not yet been adopted at the time this EIR was prepared, LOS analysis has been included to provide the public and decision-makers with information regarding the projected road network operational characteristics based on the level of development anticipated in the 2040 General Plan horizon year. After amendments to the CEQA Guidelines are adopted to implement SB 743, cities may continue to establish LOS policies but they may not be used to



determine a significant impact under CEQA. Therefore, the City's proposed change from LOS C to LOS D would not conflict with CEQA.

County of Ventura

According to the Ventura County General Plan Goals, Policies, and Programs Element Policy 4.2.2(3):

The minimum acceptable Level of Service (LOS) for road segments and intersections within the Regional Road Network and Local Road Network shall be as follows:

- a) LOS D for all County thoroughfares and Federal highways and State highways in the unincorporated area of the County, except as otherwise provided in subparagraph (b);
- b) LOS E for State Route 33 between the northerly end of the Ojai Freeway and the City of Ojai;
- c) LOS C for all County-maintained local roads; and
- d) The LOS prescribed by the applicable city for all Federal highways, State highways, city thoroughfares and city-maintained local roads located within that city, if the city has formally adopted General Plan policies, ordinances, or a reciprocal agreement with the County (similar to Policies 4.2.2-3 through 4.2.2-6) respecting development in the city that would individually or cumulatively affect the LOS of Federal highways, State highways, County thoroughfares and County-maintained local roads in the unincorporated area of the County.

At any intersection between two roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the two shall be the minimum acceptable LOS for that intersection.

Because County General Plan policy 4.2.2(3)(d) defers to "the LOS prescribed by the applicable city for all Federal highways, State highways, city thoroughfares and city-maintained local roads located within that city" the proposed change from LOS C to LOS D would not conflict with the County General Plan.

VCTC/Ventura County Congestion Management Program (CMP)

Ventura County CMP Policy B states "*Transportation planning and analysis should be consistent throughout the County.*" In addition, the CMP establishes the minimum standard of LOS E for the CMP road network. In Santa Paula, the CMP network includes only SR-126, SR-150, Harvard Boulevard between SR-150 and Peck Road, and Telegraph Road west of Peck Road.



Because the proposed change from LOS C to LOS D would not exceed the CMP standard of LOS E, it would not conflict with the CMP.

Caltrans

Caltrans does not identify a standard for LOS on Urban Streets.¹⁶⁶ Therefore, the proposed change from LOS C to LOS D would not conflict with Caltrans standards for urban streets under Caltrans jurisdiction within Santa Paula.

Caltrans considers LOS E acceptable for freeways and State highways. The City's proposed standard of LOS D would only apply to City streets and intersections; therefore, it would not conflict with this Caltrans standard.

Roadway Levels of Service

For purposes of this EIR, the 2040 General Plan would be considered to have a significant impact if the projected 2040 level of service for any analyzed road segment in Santa Paula would be worse than the established standard. The analysis assumes adoption of the proposed LOS D standard for City streets and completion of the street network as shown in the proposed 2040 Circulation Plan (**Exhibit 4.17-14**).

Exhibit 4.17-15 illustrates the 2040 forecast traffic volumes and projected levels of service for study area roadway segments. **Table 4.17-15** displays the detailed roadway segment level of service analysis results for non-Caltrans roadways, while **Table 4.17-14** summarizes the analysis for Caltrans Urban Streets (10th Street/Ojai Road/SR-150). As indicated in these tables, all roadway segments are projected to operate at an acceptable level (i.e., LOS D or better) in the 2040 General Plan horizon year. The highest congestion (LOS D) is projected to occur on the following road segments:

- Peck Road from Telegraph Road to Faulkner Road
- 10th Street (SR-150) from Santa Paula Street to Santa Maria Street

Table 4.17-14 Caltrans Urban Street Arterial LOS – Proposed General Plan (2040)

Roadway 10th Street/Ojai Road/SR-150	Direction	AM Peak Hour			PM Peak Hour		
		Posted Speed Limit (mph)	Arterial Speed (mph)	LOS	Posted Speed Limit (mph)	Arterial Speed (mph)	LOS
Northern City Limit to Santa Paula Street	NB	25-40	34.8	B	25-40	34.4	B
	SB	25-40	26.2	C	25-40	30.3	B
Santa Paula Street to Santa Maria Street	NB	25	10.9	D	25	9.3	D
	SB	25	9.3	D	25	13.5	C

Source: Chen Ryan Associates, 2019

166 Caltrans Guide for the Preparation of Traffic Impact Studies (December 2002)

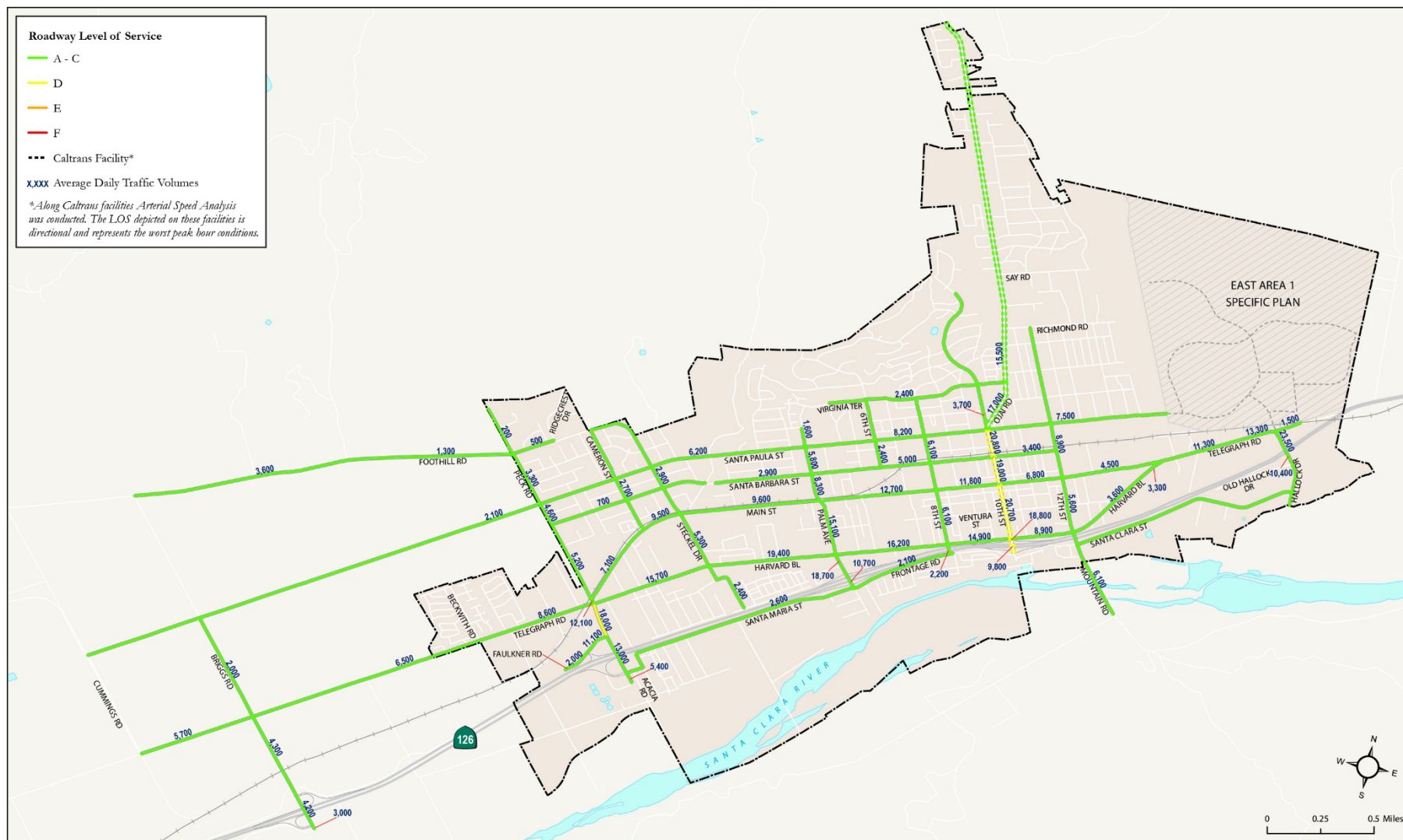


Exhibit 4.17-15 Roadway Volumes and Levels of Service – Proposed General Plan (2040)



Table 4.17-15 Roadway Segment Level of Service - Proposed General Plan (2040)

Roadway	Segment	Classification	ADT	Capacity	V/C	LOS	Jurisdiction
Briggs Road	From Santa Paula Street to Telegraph Road	2-Lane Collector	2,000	11,800	0.169	A	Ventura County
	From Telegraph Road to SR-126 WB Ramps	2-Lane Collector	4,300	11,800	0.364	A	Ventura County
	From SR-126 WB Ramps to SR-126 EB Ramps	2-Lane Collector	4,200	11,800	0.356	A	Ventura County
	From SR-126 EB Ramps to Pinkerton Road	2-Lane Collector	3,000	11,800	0.254	A	Santa Paula
Peck Road	From northern terminus to Foothill Road	2-Lane Collector	200	11,800	0.017	A	Santa Paula
	From Foothill Road to Santa Paula Street	2-Lane Collector	3,300	11,800	0.280	A	Santa Paula
	From Santa Paula Street to Santa Barbara Street	2-Lane Collector	4,600	11,800	0.390	A	Santa Paula
	From Santa Barbara Street to Main Street	2-Lane Collector	5,200	11,800	0.441	A	Santa Paula
	From Main Street to Telegraph Road	2-Lane Arterial	12,100	20,000	0.605	B	Santa Paula
	From Telegraph Road to Faulkner Road	2-Lane Arterial	18,000	20,000	0.900	D	Santa Paula
	From Faulkner Road to SR-126 EB Ramps	2-Lane Arterial	13,000	20,000	0.650	B	Santa Paula
	From SR-126 EB Ramps to southern terminus	2-Lane Arterial	5,400	20,000	0.270	A	Santa Paula
Cameron Street	From Foothill Road to Main Street	2-Lane Collector	2,700	11,800	0.229	A	Santa Paula
Steckel Drive	From Foothill Road to Main Street	2-Lane Collector	2,900	11,800	0.246	A	Santa Paula
	From Main Street to Harvard Boulevard	2-Lane Collector	5,300	11,800	0.449	A	Santa Paula
	From Harvard Boulevard to southern terminus	2-Lane Collector	2,400	11,800	0.203	A	Santa Paula
Palm Avenue	From northern terminus to Santa Paula Street	2-Lane Arterial	1,600	20,000	0.080	A	Santa Paula
	From Santa Paula Street to Santa Barbara Street	2-Lane Arterial	5,800	20,000	0.290	A	Santa Paula
	From Santa Barbara Street to Main Street	2-Lane Arterial	8,300	20,000	0.415	A	Santa Paula
	From Main Street to Harvard Boulevard	2-Lane Arterial	15,100	20,000	0.755	C	Santa Paula
	From Harvard Boulevard to SR-126 WB Ramps	4-Lane Arterial	18,700	39,900	0.469	A	Santa Paula
	From SR-126 WB Ramps to SR-126 EB Ramps	2-Lane Arterial	10,700	20,000	0.535	A	Santa Paula
	From SR-126 EB Ramps to Santa Maria Street	2-Lane Arterial	700	20,000	0.035	A	Santa Paula
	From SR-126 EB Ramps to southern terminus	2-Lane Arterial	700	20,000	0.035	A	Santa Paula
6 th Street	From Virginia Terrace to Santa Barbara Street	2-Lane Collector	2,400	11,800	0.203	A	Santa Paula
8 th Street	From Virginia Terrace to Main Street	2-Lane Collector	6,100	11,800	0.517	A	Santa Paula
	From Main Street to Harvard Boulevard	2-Lane Collector	6,100	11,800	0.517	A	Santa Paula
	From Harvard Boulevard to Santa Maria Street	2-Lane Collector	2,200	11,800	0.186	A	Santa Paula
10 th Street	From northern terminus to Santa Paula Street	2-Lane Collector	3,700	11,800	0.314	A	Santa Paula
10 th Street / SR-150	From Santa Paula Street to Santa Barbara Street	2-Lane Highway	20,800	See Table 4.17-14			Caltrans
	From Santa Barbara Street to Main Street	2-Lane Highway	19,000	See Table 4.17-14			Caltrans
	From Main Street to East Ventura Street	2-Lane Highway	20,700	See Table 4.17-14			Caltrans
10 th Street / SR-150	From East Ventura Street to Harvard Boulevard	2-Lane Highway	20,600	See Table 4.17-14			Caltrans
	From Harvard Boulevard to SR-126 WB Ramps	2-Lane Highway	18,800	See Table 4.17-14			Caltrans



Roadway	Segment	Classification	ADT	Capacity	V/C	LOS	Jurisdiction
	From SR-126 WB Ramps to SR-126 EB Ramps	2-Lane Highway	9,800	See Table 4.17-14			Caltrans
	From SR-126 EB Ramps to Santa Maria Street	2-Lane Highway	9,800	See Table 4.17-14			Caltrans
Ojai Road / SR-150	From Northern City Limits to Virginia Terrace	2-Lane Highway	15,500	See Table 4.17-14			Caltrans
	From Virginia Terrace to Santa Paula Street	2-Lane Highway	17,000	See Table 4.17-14			Caltrans
12 th Street	From Richmond Road to Main Street	2-Lane Collector	8,900	11,800	0.754	C	Santa Paula
	From Main Street to Harvard Boulevard	2-Lane Collector	5,600	11,800	0.475	A	Santa Paula
S. Mountain Road	From Harvard Boulevard to southern terminus	2-Lane Arterial	6,100	20,000	0.305	A	Santa Paula
Hallock Drive	From Telegraph Road to SR-126	4-Lane Arterial	23,500	39,900	0.589	A	Santa Paula
	From SR-126 to Old Hallock Drive	2-Lane Arterial	10,900	20,000	0.545	A	Santa Paula
Foothill Road	From Briggs Road to Peck Road	2-Lane Collector	1,300	11,800	0.110	A	Ventura County
	From Peck Road to Ridgecrest Drive	2-Lane Collector	500	11,800	0.042	A	Santa Paula
Virginia Terrace	From western terminus to Ojai Road	2-Lane Collector	2,400	11,800	0.203	A	Santa Paula
Santa Paula Street	From Cummings Road to Peck Road	2-Lane Boulevard	2,100	16,000	0.113	A	Ventura County
	From Peck Road to Palm Avenue	2-Lane Boulevard	6,200	16,000	0.388	A	Santa Paula
Santa Paula Street	From Palm Avenue to 10 th Street	2-Lane Boulevard	8,200	16,000	0.513	A	Santa Paula
	From 10 th Street to eastern terminus	2-Lane Boulevard	7,500	16,000	0.469	A	Santa Paula
Santa Barbara Street	From Peck Road to dead end	2-Lane Collector	700	11,800	0.059	A	Santa Paula
	From end to Palm Avenue	2-Lane Collector	2,900	11,800	0.246	A	Santa Paula
	From Palm Avenue to 10 th Street	2-Lane Collector	5,000	11,800	0.424	A	Santa Paula
	From 10 th Street to 12 th Street	2-Lane Collector	3,400	11,800	0.288	A	Santa Paula
Telegraph Road	From Cummings Road to Briggs Road	2-Lane Boulevard	5,700	16,000	0.356	A	Ventura County
	From Briggs Road to 950 ft. west of Beckwith Street	2-Lane Boulevard	6,500	16,000	0.406	A	Ventura County
	From 950 ft. west of Beckwith Street to Peck Road	2-Lane Boulevard	8,600	16,000	0.538	A	Santa Paula
	From Main Street to 850 ft. east of Main Street	4-Lane Boulevard	11,300	31,900	0.354	A	Santa Paula
	From 850 ft. east of Main Street to Hallock Drive	4-Lane Boulevard	13,300	31,900	0.417	A	Santa Paula
	From Hallock Drive to eastern terminus	4-Lane Boulevard	1,500	31,900	0.047	A	Santa Paula
Main Street	From Peck Road to 1,500 ft. west of Steckel Drive	2-Lane Boulevard	7,100	16,000	0.444	A	Santa Paula
	From 1,500 ft. west of Steckel Drive to Steckel Drive	2-Lane Boulevard	9,500	16,000	0.594	A	Santa Paula
	From Steckel Drive to Palm Avenue	2-Lane Boulevard	9,600	16,000	0.600	A	Santa Paula
	From Palm Avenue to 8 th Street	2-Lane Boulevard	12,700	16,000	0.794	C	Santa Paula
	From 8 th Street to 10 th Street	2-Lane Boulevard	11,800	16,000	0.738	C	Santa Paula
Main Street	From 10 th Street to 12 th Street	2-Lane Boulevard	6,800	16,000	0.425	A	Santa Paula
	From 12 th Street to Harvard Boulevard	2-Lane Boulevard	4,500	16,000	0.281	A	Santa Paula
Harvard Boulevard	From Peck Road to Steckel Drive	4-Lane Boulevard	15,700	31,900	0.492	A	Santa Paula
	From Steckel Drive to Palm Avenue	4-Lane Boulevard	19,400	31,900	0.608	B	Santa Paula
	From Palm Avenue to 8 th Street	4-Lane Boulevard	16,200	31,900	0.508	A	Santa Paula



Roadway	Segment	Classification	ADT	Capacity	V/C	LOS	Jurisdiction
	From 8 th Street to 10 th Street	4-Lane Boulevard	14,900	31,900	0.467	A	Santa Paula
	From 10 th Street to 12 th Street	4-Lane Arterial	8,900	39,900	0.223	A	Santa Paula
	From 12 th Street to 440 ft. west of Main Street	4-Lane Boulevard	3,600	31,900	0.113	A	Santa Paula
	From 440 ft. west of Main Street to Main Street	4-Lane Boulevard	3,300	31,900	0.103	A	Santa Paula
Faulkner Road	From end to SR-126 WB Ramps	2-Lane Arterial	2,000	20,000	0.100	A	Santa Paula
	From SR-126 WB Ramps to Peck Road	4-Lane Arterial	11,100	39,900	0.278	A	Santa Paula
Santa Maria Street	From Acacia Road to Palm Avenue	2-Lane Collector	2,600	11,800	0.220	A	Santa Paula
	From Palm Avenue to eastern terminus (parking lot)	2-Lane Collector	2,100	11,800	0.178	A	Santa Paula

Source: Chen Ryan Associates, 2019



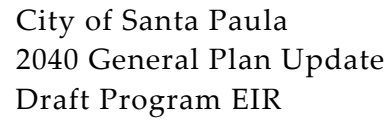
Intersection Levels of Service

Thirty-four intersections were analyzed as part of this study. Intersection geometrics were developed to match the roadway classifications proposed under the 2040 General Plan. The following intersections, which are currently unsignalized, are proposed to be signalized under the 2040 Circulation Plan.

- Faulkner Road & SR-126 WB Ramps
- Peck Road & SR-126 EB Ramps/Acacia Way
- Palm Avenue & SR-126 EB Ramps
- SR-150/Ojai Road & Virginia Terrace
- SR-150/10th Street & SR-126 WB Ramps
- E. Santa Maria Street & SR-126 EB On-Ramp/10th Street
- Hallock Drive & Telegraph Road

In addition to the installation of traffic signals, intersection geometry and signal phasing and timing improvements are also assumed as a part of the 2040 Plan. Intersection geometrics and projected peak period turning movements for the AM and PM peak periods are provided in the Technical Report (**Appendix D**). **Exhibit 4.17-16** illustrates projected 2040 intersection LOS conditions under the proposed Plan, while **Table 4.17-16** shows detailed information for each of the studied intersections. This table shows that all intersections are projected to operate at an acceptable LOS D or better in the 2040 General Plan horizon year. The following intersections are projected to have the highest congestion (LOS D):

- Peck Road & Telegraph Road (PM only)
- Peck Road & SR-126 EB Ramps (PM only)
- Steckel Drive & Main Street (PM only)
- Palm Avenue & Santa Paula Street (AM and PM)
- Palm Avenue & Santa Barbara Street (AM and PM)
- 10th Street & Santa Paula Street (AM only)
- 10th Street & SR-126 WB Ramps (PM only)
- Hallock Drive & SR-126 (AM and PM)



4. Environmental Setting and Impact Analysis

4.17 – Transportation





Table 4.17-16 Peak Hour Intersection Analysis – Proposed General Plan (2040)

ID	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour		Jurisdiction
			Avg. Delay (Seconds)	LOS	Avg. Delay (Seconds)	LOS	
1	Briggs Road & Telegraph Road	Signal	8.2	A	8.1	A	Ventura County
2	Briggs Road & SR-126 WB Ramps	SSSC	11.8	B	11.2	B	Caltrans
3	Briggs Road & SR-126 EB Ramps	SSSC	11.1	B	11.8	B	Caltrans
4	Peck Road & Foothill Road	SSSC	10.1	B	9.8	A	Santa Paula
5	Peck Road & Santa Paula Street	AWSC	20.1	C	10.4	B	Santa Paula
6	Peck Road & Santa Barbara Street	SSSC	12.8	B	11.3	B	Santa Paula
7	Peck Road & Main Street	Signal	13.5	B	7.7	A	Santa Paula
8	Peck Road & Telegraph Road	Signal	23.2	C	37.9	D	Santa Paula
9	SR-126 WB Ramps & Faulkner Road	Signal	27.5	C	26.7	C	Caltrans
10	Peck Road & SR-126 EB Ramps	Signal	15.3	B	39.3	D	Caltrans
11	Steckel Drive & Main Street	AWSC	23.6	C	29.1	D	Santa Paula
12	Steckel Drive & Harvard Boulevard	Signal	12.4	B	8.7	A	Santa Paula
13	Palm Avenue & Santa Paula Street	AWSC	32.6	D	33.3	D	Santa Paula
14	Palm Avenue & Santa Barbara Street	AWSC	27.6	D	30.7	D	Santa Paula
15	Palm Avenue & Main Street	Signal	19.3	B	12.4	B	Santa Paula
16	Palm Avenue & Harvard Boulevard	Signal	25.4	C	13.5	B	Santa Paula
17	Palm Avenue & SR-126 WB Ramps	SSSC	15.1	C	16.7	C	Caltrans
18	Palm Avenue & SR-126 EB Ramps	Signal	12.0	B	11.5	B	Caltrans
19	Palm Avenue & Santa Maria Street	SSSC	12.5	B	17.4	C	Santa Paula
20	8 th Street & Main Street	Signal	12.4	B	9.7	A	Santa Paula
21	8 th Street & Harvard Boulevard	Signal	10.6	B	7.0	A	Santa Paula
22	Ojai Road & Virginia Terrace	Signal	10.3	B	6.5	A	Caltrans
23	10 th Street & Santa Paula Street	Signal	42.3	D	32.8	C	Caltrans
24	10 th Street & Santa Barbara Street	Signal	18.6	B	14.6	B	Caltrans
25	10 th Street & Main Street	Signal	26.8	C	18.9	B	Caltrans
26	10 th Street & Harvard Boulevard	Signal	31.7	C	32.1	C	Caltrans
27	10 th Street & SR-126 WB Ramps	SSSC	15.2	C	32.5	D	Caltrans
28	10 th Street & SR-126 EB Off-Ramp	Signal	7.2	A	10.7	B	Caltrans
29	10 th Street & E. Santa Maria Street/SR-126 EB On-Ramp	Signal	5.8	A	5.4	A	Caltrans
30	12 th Street & Main Street	Signal	13.2	B	11.9	B	Santa Paula
31	12 th Street & Harvard Boulevard	Signal	9.2	A	8.9	A	Santa Paula
32	Harvard Boulevard & Telegraph Road	Signal	16.9	B	8.0	B	Santa Paula
33	Hallock Drive & Telegraph Road	Signal	25.1	C	30.3	C	Santa Paula
34	Hallock Drive & SR-126	Signal	38.6	D	50.6	D	Santa Paula

Source: Chen Ryan Associates, 2019



SR-126 Freeway Level of Service

Table 4.17-17 summarizes the Level of Service analysis for the SR-126 freeway in Santa Paula. As shown in this table, all freeway segments within Santa Paula are projected to operate at LOS D or better in the 2040 General Plan horizon year, which would not conflict with State and County standards.

Conclusion

The foregoing analysis demonstrates that based upon current growth and traffic assumptions the 2040 General Plan would not conflict with applicable vehicular operational standards for streets and intersections. The proposed General Plan policies and programs listed in **Table 4.17-18** below would ensure that the traffic impacts of new development are addressed during the development review process and would facilitate the completion of planned street improvements in a timely manner through development project requirements and regular updates to the Capital Improvement Program.

However, as is the case with all long-range forecasting, current assumptions and methodologies may not accurately predict future conditions. In addition, the City does not have control over funding and construction decisions for those portions of the circulation network that are under the control of other governmental entities such as Caltrans, and decisions by other agencies related to such facilities could affect conditions on City-controlled roadways. The 2040 Circulation and Mobility Element includes the following policies and programs intended to deal with this uncertainty to the extent feasible through ongoing review and updates to City plans and programs:

CM 1.3. Intergovernmental coordination. Coordinate with VCTC, SCAG and Caltrans to plan, fund, and improve roadways of regional importance, and local projects that further regional mobility goals.

CM 1.a. Capital Improvement Program. Regularly update the City's Capital Improvement Program (CIP) to reflect current conditions and priorities.

CM 1.g. Transportation impact analyses. Ensure that transportation impact analyses are conducted in a complimentary manner to the Ventura Countywide Transportation Plan and the SCAG RTP/SCS to contribute to desired regional transportation and environmental outcomes.

CM 1.h. General Plan review. In conjunction with each update to the RTP/SCS and the VCTC CTP, review Circulation and Mobility Element goals, policies and programs to ensure that they continue to appropriately reflect current conditions and City priorities.



Table 4.17-17 SR-126 Freeway Level of Service – Proposed General Plan (2040)

Segment	Direction	AM Peak Hour			PM Peak Hour		
		Density (pc/hr/ln)	Speed (mph)	LOS	Density (pc/hr/ln)	Speed (mph)	LOS
SR-118 to Briggs Road	EB	798	70.0	B	2080	61.0	D
	WB	1827	65.4	D	1274	69.9	C
Briggs Road to Peck Road	EB	806	70.0	B	2030	62.0	D
	WB	1783	66.1	D	1244	70.0	B
Peck Road to Palm Avenue	EB	742	70.0	A	1936	63.7	D
	WB	1700	67.1	C	1186	70.0	B
Palm Avenue to 10 th Street/SR-150	EB	680	70.0	A	1775	66.2	D
	WB	1558	68.5	C	1087	70.0	B
10 th Street/SR-150 to Hallock Drive	EB	528	55.0	A	1373	55.0	C
	WB	1210	55.0	C	841	55.0	B
Hallock Drive to Sespe Ranch Undercrossing*	EB	597	55.0	A	1552	54.5	D
	WB	1375	55.0	C	950	55.0	B

Source: Caltrans District 7, 2016; Chen Ryan Associates, 2019

* Analysis for this segment utilizes the multi-lane highway methodology as described in Chapter 2.2.4. of the Technical Report (Appendix D)



Table 4.17-18 General Plan Policies and Programs Related to Streets and Intersections

Policies	Programs
<p>CM 1.1 Performance standard. Level of service (LOS) "D" is established as the desired performance standard for City streets and intersections. Any amendment to the Land Use Plan or Circulation Plan must demonstrate conformance with this standard unless the City Council determines that the standard is infeasible due to other mobility policy priorities. For streets and highways under Caltrans jurisdiction or identified in the Congestion Management Plan, the desired LOS shall be as determined by the agency with jurisdiction.</p> <p>CM 1.2 Circulation system funding. Seek sufficient funding to properly maintain, operate and improve the public street system, and reduce the public cost of maintaining and operating the existing street system through appropriate cost-sharing measures.</p> <p>CM 1.3 Intergovernmental coordination. Coordinate with VCTC, SCAG and Caltrans to plan, fund, and improve roadways of regional importance, and local projects that further regional mobility goals.</p> <p>CM 1.4 Complete streets. Apply a flexible, balanced approach to mobility system improvements that utilizes innovative design solutions and considers the safety and mobility of all modes of travel consistent with the concept of Complete Streets.</p> <p>CM 1.5 Prioritize public safety. Place a high priority on safety and reduction of accident rates in the design of streets and intersections.</p> <p>CM 1.6 Reduce VMT. Support development and transportation improvements that help reduce per capita VMT and meet the needs of roadway users of all modes and abilities. Utilize VMT as the determinant of environmental impact significance for development projects that are consistent with the General Plan.</p> <p>CM 1.7 Green infrastructure. Incorporate green infrastructure into road design whenever feasible.</p> <p>CM 1.8 Dig once. Minimize operational disruptions in the circulation network through strategies such as "dig once." Install conduit for future telecommunications use when trenching occurs and consolidate street construction projects with utility upgrades such as water and wastewater line replacements whenever feasible.</p> <p>CM 1.9 Driveway Consolidation. Minimize the number of driveways and curb cuts along arterials, to the extent feasible, as a means of improving roadway function and capacity.</p>	<p>CM 1.a Capital Improvement Program. Regularly update the City's Capital Improvement Program (CIP) to reflect current conditions and priorities.</p> <p>CM 1.b Development review. As part of the development review process, assist applicants in demonstrating compliance with mobility policies and require developments to include circulation system improvements consistent with adopted plans, policies and the CIP.</p> <p>CM 1.c Funding sources. Actively pursue all feasible means of funding circulation system improvements.</p> <p>CM 1.d Transportation impact fees. Continue to implement a City traffic improvement fee program (TIF) and participate in applicable County or regional traffic mitigation fee programs to help defray the capital improvement costs of transportation improvements.</p> <p>CM 1.e Complete streets design standards. Establish City design standards and criteria for Complete Streets to address the needs of all users including private vehicles, public transit, bicycles, and pedestrians of all ages and abilities.</p> <p>CM 1.f Public safety. Track accident data to better understand potential safety issues facing the most vulnerable transportation users and utilize this information in developing infrastructure improvement plans.</p> <p>CM 1.g Transportation impact analyses. Ensure that transportation impact analyses are conducted in a complimentary manner to the Ventura Countywide Transportation Plan and the SCAG RTP/SCS to contribute to desired regional transportation and environmental outcomes.</p> <p>CM 1.h General Plan review. In conjunction with each update to the RTP/SCS and the VCTC CTP, review Circulation and Mobility Element goals, policies and programs to ensure that they continue to appropriately reflect current conditions and City priorities.</p>



Conformance with these proposed policies and programs would reduce potential impacts to a level that is less than significant.

Construction of new or expanded roadways could also result in other potentially significant impacts; however, road improvement projects must comply with all applicable construction and environmental regulations (e.g., air quality and noise standards, water quality regulations, etc.) that also apply to other types of development activities. Compliance with those requirements, which are discussed in each topical section of this EIR, will be demonstrated through project-level environmental review in conformance with CEQA at the time project-specific development plans are prepared, and mitigation measures may be required to avoid or reduce potential adverse environmental effects related to those projects.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to VMT, vehicle-hours-delay for heavy trucks and conflicts with a congestion management program.¹⁶⁷ The proposed Plan is consistent with RTP/SCS; however, the proposed policies and programs together with required compliance with existing regulations would reduce the incremental effects of implementation of the 2040 General Plan related to conflicts with adopted transportation measures of effectiveness to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

T-2: Conflicts with a program, plan, ordinance or policy addressing public transit

Impact Discussion

Project Impacts. In Santa Paula, the only available public transit is bus service. VCTC has prepared numerous studies that support Santa Paula's public transit availability, including the 2009 *Ventura County Transit Investment Study* identifying transit gaps and project priority, and the 2013 *Heritage Valley Transit System Study*, which focuses on "maintaining current or equivalent levels of public transit service" operating in the Heritage Valley area. The 2014

¹⁶⁷ SCAG 2016-2040 RTP/SCS PEIR, p. 3.17-63



Assessment of Annual Transportation Development Act (TDA) further refined the process of identifying and addressing unmet needs.

Service delivery strategies are designed to ensure that funding levels correspond with a level of transit service that is fiscally sustainable, but able to provide the maximum transit mobility feasible for residents of the area.

The 2009 *Ventura County Congestion Management Plan* also identifies the following transit-specific objectives due to the role transit plays in congestion reduction:

- Encouragement of public transit services that meet local and regional mobility needs
- Provide, where feasible, transit service along major commute corridors and to areas of high employment
- Preserve potential and identified transportation corridors to the maximum extent feasible

Additionally, VCTC identified the following actions in the 2013 *Ventura County Comprehensive Transportation Plan* to parlay regional transit strategies to the local scale, including ensuring funding sustainability and a robust needs identification process for future enhancements:

- Outcome 4: Transit, Action 1 – Implement the recommendations of the Regional Transit Study including needed funding, planning and policy support for creation of a more integrated system of services. Additionally, include integration of ADA paratransit services into no more than two operations and further coordination of services for seniors and persons with disabilities or need.
- Outcome 4: Transit, Action 2 – In addition to using State Transit Assistance Funds to support a sustainable level of service, as outlined in the adopted Regional Transit Study, develop a needs-based incentive program for a more integrated transit system to reward transit operators for improving connections, frequency, or capacity through the use of State Transit Assistance Funds.
- Outcome 4: Transit, Action 3 – Reevaluate the “Unmet Needs” process and definitions to ensure that transit riders’ needs are captured and given sufficient technical analysis to support any findings that are rendered.

In addition to these countywide policies, *Santa Paula Municipal Code* Chapter 16.108 (Transportation Demand Management) establishes requirements for new developments that support the use of transit, such as posting transit information on-site, encouraging carpooling and vanpooling, and providing on-site facilities that support transit use.



No specific operational or service improvements have been identified by SCAG or VCTC for transit service within Santa Paula; however, the RTP/SCS calls for expanding the public transit network and transit service on both new and existing routes to achieve greater transit accessibility and connectivity throughout the region.

Consistent with these objectives, the proposed 2040 Circulation and Mobility Element calls for the extension of Valley Express Routes A and B to serve the East Area 1 development, as well as the establishment of a transit hub near the center of East Area 1, which would support local and regional transit objectives and reduce future vehicle miles traveled (VMT) on the roadway network. **Exhibit 4.17-17** identifies the proposed extension of Valley Express routes, as well as the location of the proposed transit center in East Area 1.

The proposed transit network and General Plan policies and programs listed in **Table 4.17-19** below would not conflict with applicable policies and regulations; therefore, potential impacts would be less than significant.

Table 4.17-19 General Plan Policies and Programs That Encourage Use of Public Transit

Policies	Programs
<p>CM 2.1 Regional transit coordination. Support VCTC and other transit operators in providing convenient and cost-effective local and regional transit service.</p> <p>CM 2.2 Land use planning. Locate major commercial services, employment centers and public facilities near bus routes whenever feasible.</p> <p>CM 2.3 Rail corridor. Encourage cooperative regional agreements to promote greater utilization of the rail corridor for both transportation and recreation.</p>	<p>CM 2.a Support enhanced bus service. Actively participate in VCTC programs designed to enhance bus service offerings and bolster ridership.</p> <p>CM 2.b New development. Work with developers and service providers to ensure that new projects are designed to enhance transit connectivity and accessibility and ensure compliance with Transportation Demand Management regulations.</p> <p>CM 2.c Downtown depot. Preserve options for a future commuter passenger station at the historic depot with facilities for convenient transfers between different modes of transport.</p> <p>CM 2.d Commuter rail. Work with VCTC and Metrolink to assess potential commuter rail service feasibility, as well as with recreational operators as necessary to preserve excursion service.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would not result in significant cumulative impacts related to public transit.¹⁶⁸ The proposed Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

¹⁶⁸ SCAG 2016-2040 RTP/SCS PEIR, p. 3.17-51

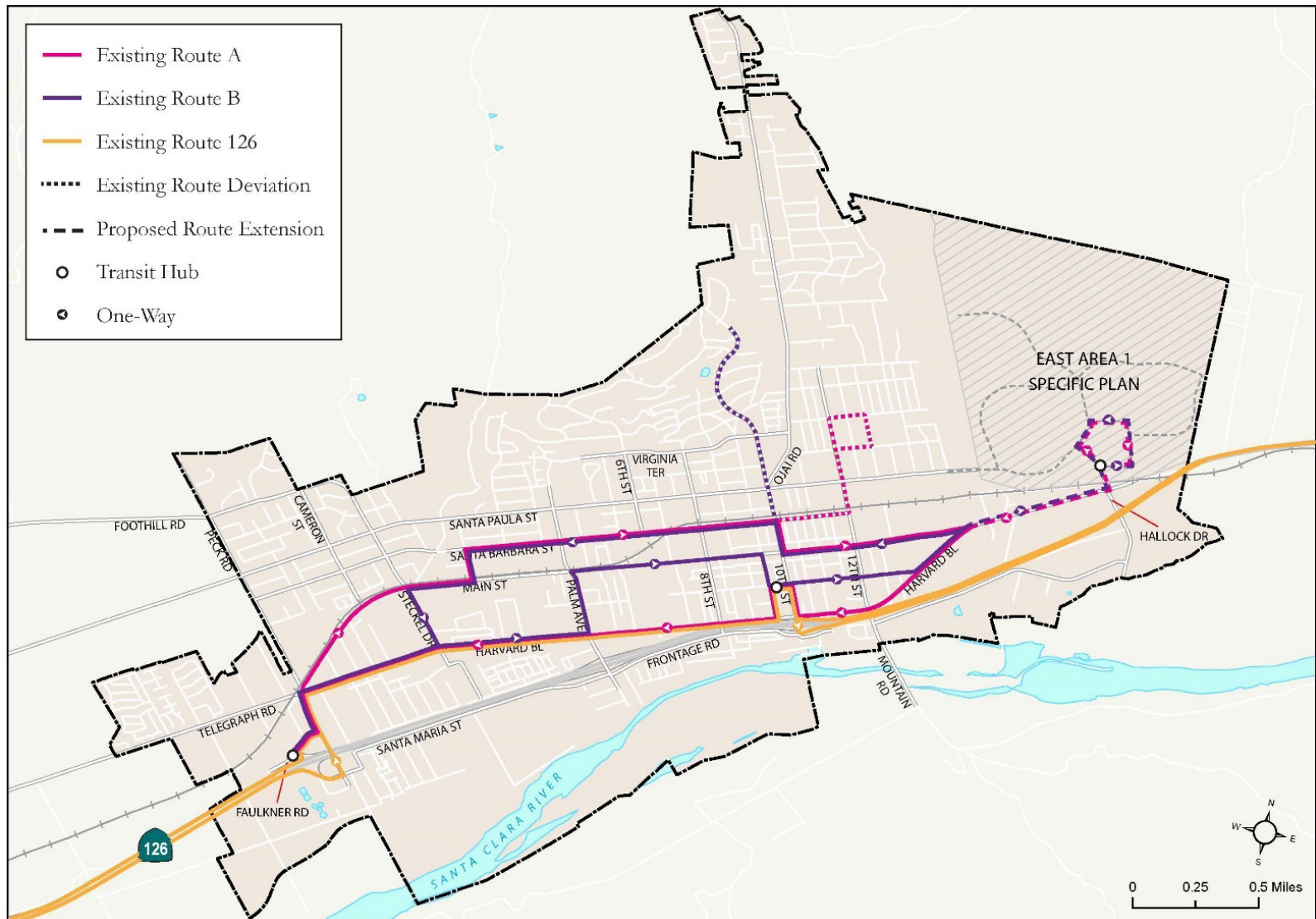


Exhibit 4.17-17 Planned Transit Network – Proposed General Plan (2040)



Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

T-3: Conflicts with a program, plan, ordinance or policy addressing pedestrian and bicycle facilities

Impact Discussion

Project Impacts. The planned land uses identified in the 2040 Land Use Element, particularly the mix of uses in central Santa Paula, along Harvard Boulevard, and in East Area 1, support multi-modal transportation options for pedestrians, bicyclists, and transit users. The planned transit center in East Area 1 will offer additional transportation options in an area with a compact, walkable center.

The 2040 Circulation and Mobility Element identifies priority pedestrian focus areas as shown in **Exhibit 4.17-18**. These locations will benefit from a pedestrian-oriented design with appropriate amenities for walking. Additionally, each of these areas currently have or are anticipated to have sizable pedestrian volumes from nearby residential neighborhoods, schools, retail, transit connections, and community features. **Table 4.17-20** shows sample pedestrian treatments proposed for the Downtown and East Area 1 Pedestrian Priority Focus Areas. Downtown Santa Paula plays an important role as the location of important civic buildings, an existing mixed-use environment, cultural attractions, and proximity to Santa Paula's transit routes and stops. This area has existing pedestrian-oriented features, including landscaped walkways, high-visibility pedestrian crossings at convenient intervals, pedestrian-scale lighting, curb bulb outs, and a generally human-scale traffic-calmed environment. As planned growth occurs in East Area 1, similar multimodal features will foster a balanced mix of transportation modes and encourage walking as a viable transportation mode.

Potential treatments for the Priority Focus Area along Harvard Boulevard are shown in **Table 4.17-21**. This focus area will benefit from increased safety features, such as installation of high-visibility crosswalks, advanced stop bars for vehicles, lead pedestrian intervals at signalized intersections, pedestrian countdown signals, and potential new midblock crossings, either by installing a hybrid beacon or rectangular rapid flashing beacon.

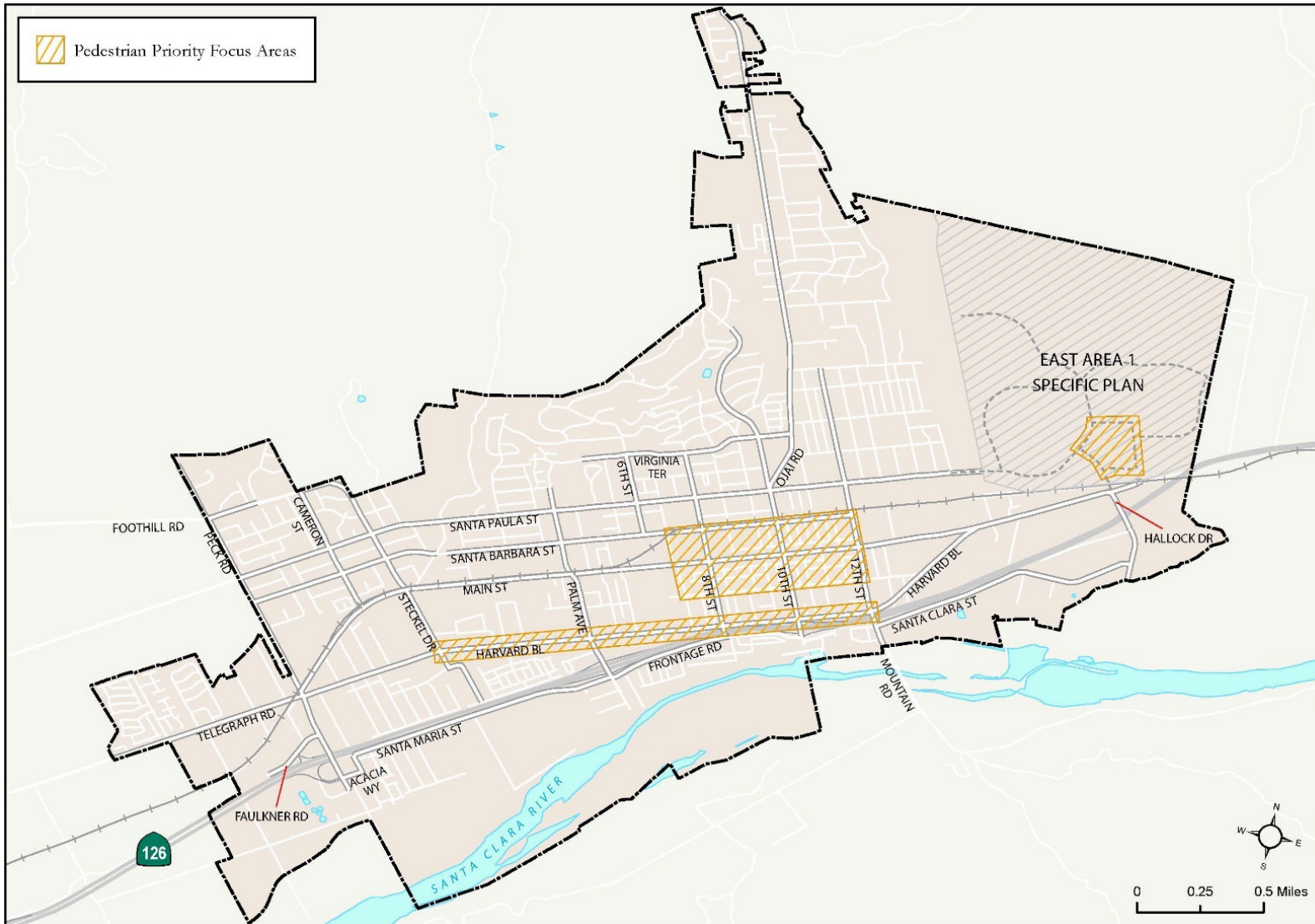







Exhibit 4.17-18 Pedestrian Priority Focus Areas – Proposed General Plan (2040)









Table 4.17-20 Downtown/East Area 1 Pedestrian Treatment Toolbox

Description	Example
Decorative Crosswalks improve crosswalk visibility to drivers and are visually appealing. Decorative crosswalks can be used to help brand a district and create an identity, with designs developed from local artists or students.	
Curb Bulb-Outs/Extensions shorten the crossing distance for pedestrians and ensure vehicles make turns at slower speeds.	
Lead Pedestrian Intervals give pedestrians a 3-7 second head start when entering an intersection, reinforcing their right-of-way over turning vehicles.	
Pedestrian Scale Lighting can increase visibility along sidewalks and intersection approaches while creating a more comfortable and inviting pedestrian environment.	
Pedestrian Amenities such as seating, shaded areas, trash cans, and landscaping enhance the pedestrian environment.	

Source: California Streets and Highway Code, 2014; Chen Ryan Associates, 2019.



Table 4.17-21 Harvard Boulevard Pedestrian Treatment Toolbox

Description	Example
Continental Crosswalks improve crosswalk visibility and reinforce to drivers where to stop. Continental crosswalks may be used in conjunction with advance stop bars.	
Advance Stop Bars/Lines encourage drivers to stop well before the crosswalk, improving pedestrian safety and pedestrian visibility to drivers. May be used at intersections or mid-block crossings with additional signage.	
Lead Pedestrian Intervals give pedestrians a 3-7 second head start when entering an intersection, reinforcing their right-of-way over turning vehicles.	
Pedestrian Countdown Signals indicate to the pedestrian how many seconds are remaining in the pedestrian phase.	
Pedestrian Hybrid Beacon (<i>top</i>) is a traffic control device used to stop vehicular traffic and allow pedestrians to cross safely. Vehicular traffic is only stopped when a pedestrian is present and activates the signal.	
Rectangular Rapid Flashing Beacons (<i>bottom</i>) are pedestrian activated flashing signs that alert drivers a pedestrian is crossing.	

Source: California Streets and Highway Code, 2014; Chen Ryan Associates, 2019.



Bicycle facilities proposed in the 2040 Circulation and Mobility Element are shown in **Exhibit 4.17-19**. The planned network is intended to enhance connectivity throughout Santa Paula and to networks in adjacent jurisdictions. The network also emphasizes connections to Valley Express and VCTC Bus 126, which offers connectivity to communities to the east and west.

Additionally, the bicycle network is designed to leverage recent investments in the Santa Paula Branch Line Rail Trail, which offers excellent cross-town multimodal connectivity and would eventually link neighboring jurisdictions throughout the Santa Clara Valley. The complete bicycle network is designed to provide complementary on-street facilities that link users with this trail, as well as serve those using on-street facilities for their entire trip.

For the purposes of Santa Paula's planned mobility network, bicycle facilities may come with the tradeoff of on-street parking along some roadway segments where a surplus of on-street parking exists or where nearby off-street parking is available, but the number of roadway travel lanes would remain unchanged. Additionally, the proposed plan would reduce the number of travel lanes on the following street section to capitalized on the excess vehicular capacity, and to benefit from potential multimodal treatments:

- Main Street, from Peck Road to Steckel Drive

The planned bicycle network includes approximately 22.0 miles of bicycle facilities, including 4.5 miles of multi-use paths, 4.3 miles of bike lanes, 7.2 miles of bike routes, and 6.0 miles of potential buffered bike lanes and/or cycle tracks, as described below:

Class I Multi-Use Path:

- Continuation of the Santa Paula Branch Line Rail Trail within Santa Paula City limits, with a branch segment connecting to Santa Paula Street.

Class II Bike Lanes:

North-South Bike Lanes

- Steckel Drive, from Main Street to Harvard Boulevard;
- Palm Avenue, from Santa Paula Street to Santa Maria Street;
- 10th Street/SR-150, from Santa Paula Street to Harvard Boulevard; and
- Newly constructed roadways as East Area 1 development occurs.



Exhibit 4.17-19 Bicycle Facilities Plan – Proposed General Plan (2040)



Class III Bike Routes:

North-South Bike Routes

- Peck Road, from Santa Paula Street to Acacia Way;
- Steckel Drive, from Santa Paula Street to Main Street;
- 8th Street, from Santa Paula Street to Santa Maria Street;
- Ojai Road/SR-150 from northern City limits to Santa Paula Street; and
- 12th Street from Santa Paula Street to southern City limits.

East-West Bike Routes

- Main Street, from Palm Avenue to Harvard Boulevard/Telegraph Road;
- Acacia Way/Santa Maria Street, from Peck Road to 8th Street; and
- Harvard Boulevard, from 10th Street to 12th Street.

Buffered Class II Bike Lanes or Class IV Cycle Tracks:

East-West Cycle Tracks/Buffered Bike Lanes

- Santa Paula Street, from Peck Road to eastern terminus/East Area 1 boundary;
- Telegraph Road/Harvard Boulevard, from western City limits to Main Street;
- Harvard Boulevard, from 12th Street to Main Street/Telegraph Road; and
- Telegraph Road, from Main Street/Harvard Boulevard to eastern terminus.

Consistency with Regional Plans and Policies

The **2016-2040 RTP/SCS** defines “active transportation” as “*A mode of transportation that includes walking, running, biking, skateboarding and other human powered forms of transportation. It can also include low-speed electrical devices such as motorized wheel chairs, Segways, electric-assist bicycles and neighborhood electric vehicles, such as golf carts.*”¹⁶⁹

About 38% of all trips in the region are three miles or less¹⁷⁰ and active transportation is a key component of the RTP/SCS transportation strategy that supports improved transportation options, particularly for shorter trips. Improving access for walkers and bicyclists increases safety by reducing conflict points and slows motor vehicles along residential and other low-speed streets. It is cost-effective, using a Complete Streets approach to developing and implementing larger transportation projects to reduce total costs.¹⁷¹

¹⁶⁹ SCAG, 2016-2040 RTP/SCS, p. 184

¹⁷⁰ Ibid, p. 82

¹⁷¹ Ibid, Active Transportation Appendix, p. 27



The Active Transportation component of the RTP/SCS includes 11 specific strategies in four broad categories for maximizing active transportation in the SCAG region. **Table 4.17-22** demonstrates that the proposed 2040 General Plan would not conflict with RTP/SCS Active Transportation policies.

Table 4.17-22 General Plan consistency with RTP/SCS Active Transportation Policies

RTP/SCS Active Transportation Policies	2040 General Plan Policies and Programs
Regional-Trip Strategies:	
1. Regional Greenway Network (RGN)	There are no RGN facilities within Santa Paula; therefore, the proposed Bicycle Facilities Plan would not conflict with the RTP/SCS.
2. Regional Bikeway Network (RBN)	The RBN includes Bicycle Route 126, which runs through the Santa Clara Valley from the Antelope Valley to the coast. The proposed Bicycle Facilities Plan includes the Santa Paula Branch Line Rail Trail, a Class I Multi-Use Path, which is consistent with this designation.
3. California Coastal Trail Access	Santa Paula is not within the Coastal Zone; however, the proposed Bicycle Facilities Plan designates a regional connection to coastal trails.
Transit Integration Strategies:	
4. First/Last Mile (to rail)	This policy is not currently applicable to Santa Paula because there is no commuter rail service in the city. However, the proposed Bicycle Facilities Plan includes bike routes that would serve the Downtown train station in the event that rail service is provided in the future.
5. Livable Corridors (bus corridors)	The 2040 Circulation and Mobility Element supports active transportation investments such as sidewalk maintenance/enhancement, intersection improvements, bicycle lanes and boulevards to facilitate safe and easy active transportation (e.g., Policies 3.2, 3.3, 3.4, 3.6). These policies help to support the Livable Corridors concept.
6. Bike Share Services	The 2040 Circulation and Mobility Element supports bike share services (e.g., Policy 3.3).
Short-Trip Strategies:	
7. Sidewalk quality	The 2040 Circulation and Mobility Element supports sidewalk maintenance/enhancement (e.g., Policies 3.2, 3.3, 3.6).
8. Local Bikeway Networks	Local Bikeway Networks provide the bikeway density that complements the interconnectivity of the regional bikeway network, providing additional first mile/last mile connectivity to local shops, schools, employment, and recreational activities. The 2040 Circulation and Mobility Element supports the local network of bicycle lanes (e.g., Policies 3.2, 3.3, 3.6).
9. Neighborhood Mobility Areas (limited transit)	Neighborhood Mobility Areas focus on connections within a district. This strategy includes policies designed to encourage replacing automobile use with biking, walking, skateboarding, and neighborhood electric vehicles. Complete Streets strategies, such as traffic calming, bicycle priority streets (bicycle boulevards) and pedestrian connectivity increase physical activity and improve connectivity to the regional bikeway/greenway networks, local businesses and parks. The 2040 Circulation and Mobility Element supports neighborhood mobility areas (e.g., Policies 3.2, 3.3, 3.5, 3.6).



RTP/SCS Active Transportation Policies	2040 General Plan Policies and Programs
Education/Encouragement Strategies	
10. Safe Routes to School	The 2040 Circulation and Mobility Element supports Safe Routes to School (e.g., Policy 4.3).
11. Safety/Encouragement Campaigns	Safety and encouragement public information campaigns that include advertising, public service announcements and media kits are part of a suite of strategies to encourage active transportation (e.g., Policy 4.4).

Consistency with Countywide Plans and Policies

- The **Ventura County Comprehensive Transportation Plan (2013)** is a long-range policy document, built from community-based, local priorities and community-expressed need to enhance regional connections. It is aimed at ensuring mobility and enhancing the quality of life for all Ventura County residents. The CTP also examines funding strategies and options from the federal, state, regional and local levels. It is intended to provide a framework for future community-based planning and collaboration and inform Ventura County's long-range transportation decisions.

The CTP notes that while cities and communities have strengthened their local bicycle and pedestrian infrastructure in recent years, significant gaps and safety issues in these networks still exist, both within and between cities. Connecting these networks on a regional scale would further strengthen these networks' usefulness and contributions to congestion relief.

The proposed 2040 General Plan policies and programs (**Table 4.17-23**) support the enhancement of bicycle and pedestrian networks within the city as well as regional connections; therefore, it would not conflict with the CTP.

Table 4.17-23 General Plan Policies and Programs That Support Pedestrian and Bicycle Mobility

Policies	Programs
<p>CM 3.1 Regional coordination. Support implementation of the Ventura Countywide Bicycle Master Plan, the Ventura County Regional Bikeway Wayfinding Plan, and the City's Planned Bicycle Network.</p> <p>CM 3.2 Encourage pedestrian activity. Ensure that streets, sidewalks and pathways are designed to encourage pedestrian activity by minimizing obstructions, appropriate grades, and locating crosswalks and pedestrian warning signs in areas of concentrated pedestrian activity.</p> <p>CM 3.3 Pedestrian and bicycle facilities. Ensure that new developments in expansion areas, and new commercial and industrial developments, are designed to ensure continuity with the existing non-motorized transportation network and include well-designed pedestrian and bicycle facilities, such as:</p> <ul style="list-style-type: none"> - sidewalks with adequate buffers from automobile traffic; - connections to the public sidewalk system; 	<p>CM 3.a Development review. As part of the development review process, assist applicants in demonstrating conformance with pedestrian and bicycle mobility plans, policies and regulations.</p> <p>CM 3.b Pedestrian and bicycle facility funding. Pursue additional funding sources for implementation of the Planned Bicycle Network and pedestrian enhancements.</p> <p>CM 3.c Capital Improvement Program. Incorporate priority pedestrian and bicycle facility improvements in the Capital Improvement Program.</p> <p>CM 3.d Regional coordination. Work with VCTC and neighboring jurisdictions to complete the Heritage Valley bike path and other non-motorized routes identified in the County Regional Trails and Pathway Master Plan.</p>



Policies	Programs
<ul style="list-style-type: none"> - seating areas; and - bicycle parking and bike share facilities. <p>CM 3.4 Bicycle accessibility. Enhance bicycle accessibility between the Historic Depot, Downtown and other areas of the city, particularly districts to the north and south that are not served by the east-west Santa Paula Branch Trail.</p> <p>CM 3.5 Traffic calming. Explore traffic calming strategies including high-visibility crosswalks and curb extensions/bulb-outs to reduce pedestrian crossing distances along key corridors such as SR-150, Main Street in Downtown, the Harvard Boulevard corridor, and school zones.</p> <p>CM 3.6 Pedestrian priority focus areas. Coordinate pedestrian priority focus areas with existing and future improvement plans for Downtown and the Harvard Boulevard Corridor.</p>	

- The **Ventura County Coordinated Public Transit-Human Services Plan (2016)** also provides county-level support to first- and last-mile connections to transit, with particular attention paid to the unique needs of seniors, persons with disabilities, and persons of low income. While this plan is primarily implemented by transit providers and countywide transit agencies, the proposed 2040 General Plan supports transit and active transportation; therefore, it would not conflict with the priorities identified in the plan.
- The **Ventura Countywide Bicycle Master Plan (2007)** provides a blueprint for bicycle transportation and recreation in Ventura County. This plan is an effort of the VCTC, a governing commission that develops and implements transportation policies, projects, funding and priorities for projects in Ventura County. The plan provides a broad vision, strategies and actions for the improvement of bicycling in Ventura County. A key reason for preparing the Countywide Bicycle Master Plan was to satisfy state and federal funding requirements such as the California Bicycle Transportation Account (BTA). In addition to serving as a countywide planning document for VCTC, this document also includes BTA-compliant bicycle master plans for unincorporated Ventura County and the cities of Moorpark, Port Hueneme, and Santa Paula.

The proposed 2040 Bicycle Facilities Plan (**Exhibit 4.17-19**) is consistent with the bicycle route designations contained in the Countywide Bicycle Master Plan; therefore, no conflict would occur.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would not result in significant cumulative impacts related to pedestrian and bicycle facilities.¹⁷² The

¹⁷² SCAG 2016-2040 RTP/SCS PEIR, p. 3.17-51



proposed Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to *CEQA Guidelines* §15130(d).

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

T-4: Conflict or be inconsistent with CEQA Guidelines §15064.3(b)

Impact Discussion

Section 15064.3 was added to the CEQA Guidelines in December 2018 to establish criteria for analyzing transportation impacts pursuant to SB 743 of 2013. A major provision of this law was to replace vehicle delay (i.e., level of service) with vehicle miles traveled (VMT) as the key criterion for determining significant transportation impacts for purposes of CEQA analysis. Under SB 743, a project's effect on roadway congestion and automobile delay shall not constitute a significant environmental impact. Other relevant considerations may include the effects of the project on transit and non-motorized travel.

Section 15064.3(c) provides that these new criteria for evaluating transportation impacts will not become mandatory until July 1, 2020. The technical transportation and mobility analysis conducted for the 2040 General Plan was commenced in 2017 at the time the Notice of Preparation was circulated, more than a year before adoption of the current CEQA Guidelines in December 2018 and three years before their mandatory implementation date.

Section 15064.3(b) provides that "a lead agency may analyze the project's vehicle miles traveled qualitatively" and that "such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc." Furthermore, "A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled ..."

Based on all of these considerations, the City has determined that a qualitative analytical approach is appropriate for this Program EIR. Unlike an environmental analysis conducted for a specific development project in a discrete location, the following discussion reflects a methodology and level of detail appropriate for this General Plan Program EIR based on



long-term assumptions of citywide development patterns rather than specific development proposals.

Project Impacts. Although Santa Paula is only the 8th largest of the ten cities in Ventura County by population, it ranks second, behind only Oxnard, in population density with approximately 6,784 persons per square mile as of 2018.¹⁷³ Due to the limited amount of vacant land available for residential development, the proposed 2040 General Plan emphasizes infill, higher-density and mixed-use projects in appropriate locations, particularly near Downtown. These components of the proposed Land Use Plan facilitate greater use of transit and non-motorized travel to support regional goals of reduced VMT and GHG emissions. The 2040 General Plan Circulation and Mobility Element also places greater emphasis on active transportation through enhanced pedestrian and bicycle facilities.

In addition to the provisions of the Land Use Element and the Circulation and Mobility Element, examples of policies and programs contained in the 2040 General Plan that support compact development and reduced VMT are summarized in **Table 4.17-24**. Collectively, these plans, policies and programs would reduce potential impacts to a level that is less than significant.

Table 4.17-24 General Plan Policies and Programs Supporting Reduced VMT

Policies	Programs
<p>LU 3.3. Diverse housing supply. Provide for a full range of housing types, locations and densities to accommodate the city's share of regional housing needs for all income segments in a manner that:</p> <ul style="list-style-type: none">- Retains the scale and character of existing neighborhoods;- Facilitates upgrading and infill of underutilized land in existing neighborhoods;- Allows expansion into vacant and underdeveloped lands consistent with infrastructure and environmental constraints; and- Encourages development of high-quality estate homes in designated expansion areas <p>LU 3.5. Compact multi-family development. Encourage multi-family residential development within walking distance of commercial services and public amenities.</p> <p>LU 4.1. Balanced development. Facilitate balanced development consistent with the 2040 RTP/SCS within the existing City limits and the expansion areas subject to the restrictions of the CURB with emphasis on infill development and reuse in accordance with adopted land use regulations and design guidelines. Proposals for annexation should be supported by a fiscal and market analysis demonstrating the feasibility of the proposed development. Where annexation is appropriate, contiguous lands should be developed first and preparation of a Specific Plan will be required. Development in the expansion areas shall be consistent with Table LU-5 of the Land Use Plan.</p>	<p>LU 4.a. Development review. As part of the development review process, assist applicants in demonstrating conformance with applicable standards and design guidelines through the use of checklists, handouts, etc. For proposed developments in the Sphere of Influence and expansion areas, work cooperatively with LAFCO and Ventura County to process annexations as development proposals are reviewed and approved by the City.</p> <p>LU 4.b General Plan review. Conduct a thorough review of General Plan growth assumptions and policies following the adoption of each 4-year update to the RTP/SCS and make adjustments to land use and infrastructure plans and policies as appropriate.</p> <p>ECR 2.a. Land use planning. Work cooperatively with SCAG to ensure that City's land use plans and regulations are consistent with the RTP/SCS. Avoid locating sensitive receptors near sources of pollutant emissions such as high-volume roadways.</p>

173 Southern California Association of Governments, *Profile of the City of Santa Paula*, 2019



Cumulative Impacts. As noted previously in **Section 4.4-3**, transportation accounts for the greatest proportion of GHG emissions on a regional and state level. Across the six counties in the SCAG region, the 2016-2040 RTP/SCS PEIR noted that GHG emissions from transportation are projected to decrease by approximately 24% by 2040 compared to existing conditions (2012 Base Year) with the largest reductions in Orange, Los Angeles, and Ventura counties. SCAG estimated that GHG emissions from transportation sources in Ventura County will decline by about 35% from 2012 to 2040 (**Table 4.4-10**). The proposed 2040 General Plan is consistent with RTP/SCS; therefore, the incremental effects of implementation of the 2040 General Plan related to VMT are considered to be less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

T-5: Hazardous geometric design features or incompatible uses

Impact Discussion

Project Impacts. All development projects and infrastructure, both public and private, are required to comply with applicable policies, regulations and standards intended to avoid hazardous conditions. The 2040 General Plan Circulation and Mobility Element establishes roadway classifications and general standards designed to accommodate projected traffic volumes and ensure adequate access. To implement General Plan standards, the City Public Works Department has adopted Standard Plans¹⁷⁴ that include detailed roadway specifications such as street widths, grades, curvatures, sight distances, separation between travel lanes and parking and bicycle lanes, etc. Compliance with these requirements is verified during the plan check process prior to approval of a building permit and by field inspections during and after construction.

These regulations are supported by the policies and programs contained in the 2040 General Plan, as summarized in **Table 4.17-25**. Collectively, these policies, programs and regulations

¹⁷⁴ <http://www.ci.santa-paula.ca.us/PubWorks/StandardPlans2009.pdf>



would reduce potential impacts related to hazardous design features to a level that is less than significant.

Table 4.17-25 General Plan Policies and Programs Related to Hazardous Design Features

Policies	Programs
CM 1.4 Complete streets. Apply a flexible, balanced approach to mobility system improvements that utilizes innovative design solutions and considers the safety and mobility of all modes of travel consistent with the concept of Complete Streets. CM 1.5 Prioritize public safety. Place a high priority on safety and reduction of accident rates.	CM 1.b Development review. As part of the development review process, assist applicants in demonstrating compliance with mobility policies and require developments to include circulation system improvements consistent with adopted plans, policies and the CIP. CM 1.e Complete streets design standards. Establish design standards and criteria for Complete Streets to address the needs of all users including private vehicles, public transit, bicycles, and pedestrians of all ages and abilities. CM 1.f Public safety. Track accident data to better understand potential safety issues facing the most vulnerable transportation users and utilize this information in developing infrastructure improvement plans. CM 1.h Municipal Code review. Review and update the Municipal Code and Standard Plans periodically to ensure consistency with the Circulation and Mobility Element.

Hazards due to incompatible uses could include such things as farm or construction equipment on public roads. While Santa Paula is located in a major agricultural area, only a small amount of land is currently farmed within the City limits and no land is designated for agriculture in either the current General Plan or the proposed 2040 General Plan. Therefore, conflicts between farm equipment and general traffic is likely to be rare within Santa Paula. In addition, State highway regulations establish safety requirements for oversize or slow-moving vehicles on public roads, such as flashing lights and/or escort vehicles. As a result, potential impacts due to incompatible uses would be less than significant.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would result in less than significant cumulative impacts with respect to hazardous design features.¹⁷⁵ The proposed Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to CEQA Guidelines §15130(d).

Level of Significance

Less than significant

¹⁷⁵ SCAG 2016-2040 RTP/SCS PEIR, p. 3.17-50



Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

T-6: Inadequate emergency access

Impact Discussion

Project Impacts. Inadequate emergency access could result if the design of streets or development projects did not provide sufficient capacity for police, fire or other emergency vehicles, or if access were temporarily blocked or constrained during construction, such as through a temporary lane closure.

All new developments and infrastructure projects, both public and private, are required to comply with policies, regulations and standards that include provision of adequate emergency access. The 2040 Circulation and Mobility Element would establish roadway classifications and general standards designed to accommodate projected traffic volumes and ensure adequate access. To implement General Plan standards, the City Public Works Department has adopted Standard Plans¹⁷⁶ that include detailed roadway construction specifications. Compliance with these requirements is verified during the plan check process prior to approval of a building permit and by field inspections during and after construction.

Santa Paula Municipal Code Title IX, Chapter 96 (Streets and Sidewalks), Sec. 96.35 also requires that any encroachment into the public right-of-way provide and maintain safety devices, including but not limited to lights, barricades, signs, and watchmen as necessary to protect the public. In addition, the Standard Plans include requirements for preparation of traffic control plans for work done in the public-right-of-way, which ensure that adequate emergency access is maintained at all times. Compliance with these requirements is verified during the plan check process prior to approval of a building permit or an encroachment permit.

These regulations are supported by the policies and programs contained in the 2040 General Plan, as summarized in **Table 4.17-26**. Collectively, these policies, programs and regulations would reduce potential impacts to emergency access to a level that is less than significant.

¹⁷⁶ <http://www.ci.santa-paula.ca.us/PubWorks/StandardPlans2009.pdf>



Table 4.17-26 General Plan Policies and Programs Related to Emergency Access

Policies	Programs
CM 1.5 Prioritize public safety. Place a high priority on safety and reduction of accident rates and ensure that adequate emergency access is provided.	CM 1.b Development review. As part of the development review process, assist applicants in demonstrating compliance with all applicable mobility policies, standards and regulations, and require developments to include circulation system improvements consistent with adopted policies and the CIP. CM 1.i Municipal Code review. Review and update the Municipal Code and Standard Plans periodically to ensure consistency with the Circulation and Mobility Element.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to emergency access.¹⁷⁷ The proposed Plan is consistent with RTP/SCS; however, the proposed policies and programs together with required compliance with existing regulations would reduce the incremental effects of implementation of the 2040 General Plan related to emergency access to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

¹⁷⁷ SCAG 2016-2040 RTP/SCS PEIR, p. 3.17-64

4. Environmental Setting and Impact Analysis
4.17 – Transportation



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4.18 Utilities and Service Systems

This section addresses the issues of water supply, wastewater treatment, and solid waste disposal. The related topic of stormwater drainage is discussed in **Section 4.10 – Hydrology and Water Quality**.

4.18-1 Setting

Existing Physical Conditions

Water Supply

Water Sources. The Santa Paula 2016 Urban Water Management Plan (adopted August 2017) describes current and projected water supply and demand in Santa Paula. Currently, the Santa Paula Groundwater Basin is the city's sole source of potable water supply. The Santa Paula Basin is located along the Santa Clara River, between Saticoy and the eastern City limits (**Exhibit 4.18-1**). The Santa Paula Basin is one of a series of interconnected groundwater basins underlying the Santa Clara River Valley. The deepest part of the Santa Paula Basin is approximately 4,000 feet, and approximately 4.9 million acre-feet (AF) of water is contained in storage.

The Santa Paula Groundwater Basin is recharged by percolation from the Santa Clara River, Santa Paula Creek, and other minor tributaries, subsurface inflow from the Fillmore Basin, precipitation and local runoff, and agricultural/landscape return flows. Depth to groundwater varies from 30 to 200 feet, depending on the location within the basin and hydrogeologic conditions.

The Santa Paula Groundwater Basin was adjudicated in 1996. The judgment allocates the use of groundwater between the City of Ventura and the Santa Paula Basin Pumpers Association (SPBPA), which is a consortium of water users in the Santa Paula area, including the City and farming interests. Currently, members of SPBPA have a cumulative allocation to pump on average 27,515 AFY. The City of Santa Paula has an allocation to pump on average 5,488 AFY.

Santa Paula's current groundwater supply includes production from five active wells. City wells vary in depth from 350 to 700 feet with casing diameters from 12 to 18 inches. Estimated well capacity ranges from 350 to 3,375 gallons per minute. Depth to groundwater varies from approximately 60 to 100 feet. Two of the wells, No. 12 and No. 14, produced 78% of the water for the city in 2015.

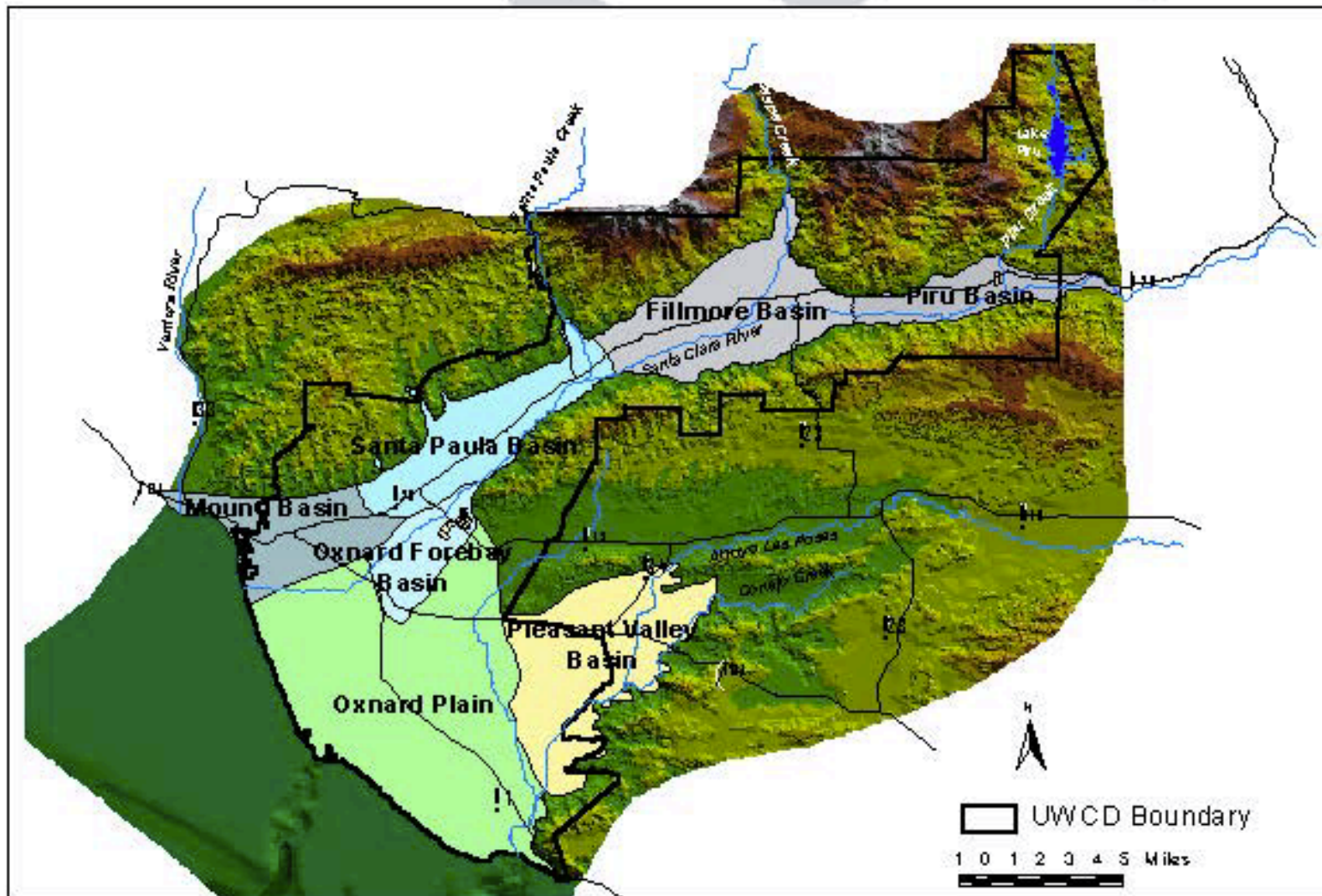


The City also has rights to surface water from Santa Paula Creek. Currently, the City provides an annual average of 500 AFY of surface water from Santa Paula Creek to the Farmers Irrigation Company, which uses the water for irrigation in lieu of pumped groundwater, while the City gains 500 AFY groundwater pumping credits in the Santa Paula Basin. The agreement eliminates the need to treat the surface water for domestic use.

Water Distribution System. The Santa Paula water system (**Exhibit 4.18-2**) provides domestic water to four main pressure zones: the 200-foot, 400-foot, 600-foot, and 900-foot (Canyon) zones. The 200-foot zone is the main zone through which all water is delivered. The various groundwater wells provide water to the 200-foot zone's Main Reservoir and the Anderson Tank, which directly serve most of the city. Water to the higher zones is delivered by booster pump stations that are supplied directly or indirectly from the 200-foot zone.

The existing potable water system consists of more than 96 miles of distribution mains ranging in size from 1-inch to 20-inch diameter pipes, mostly steel, cast iron, or asbestos cement. The system also includes ductile iron and PVC. Early areas of development, including Downtown, the central residential areas and a few other areas, have considerably older pipe, some dating back to the 1910s. Despite the age of much of the system, the number of leaks is believed to be relatively low.

Water Quality. Principal concerns affecting groundwater quality in the basin are the presence of elevated concentrations of manganese, iron, sulfate, and total dissolved solids (TDS). To address these concerns, a centralized water conditioning facility (Steckel Plant) was completed in 2000 to remove manganese and iron from up to 10 million gallons of water per day (MGD). The Steckel Plant currently provides treatment for three of the City's domestic water wells (Wells Nos. 11, 13, 14). Well No. 12 has an on-site manganese and iron removal system. In 2015, 97.3% of the water served was treated at the City's two iron and manganese removal facilities prior to delivery. The remaining 2.7% from Well 1-B was used to meet peak demands during summer months. The City is considering pumping groundwater produced from Well 1-B to the Steckel Plant for manganese removal. These treatment systems are anticipated to continue to reduce the manganese and iron concentrations to levels within the secondary standard limits.



Source: UWCD, 2016.

Exhibit 4.18-1 Santa Paula Area Groundwater Basins

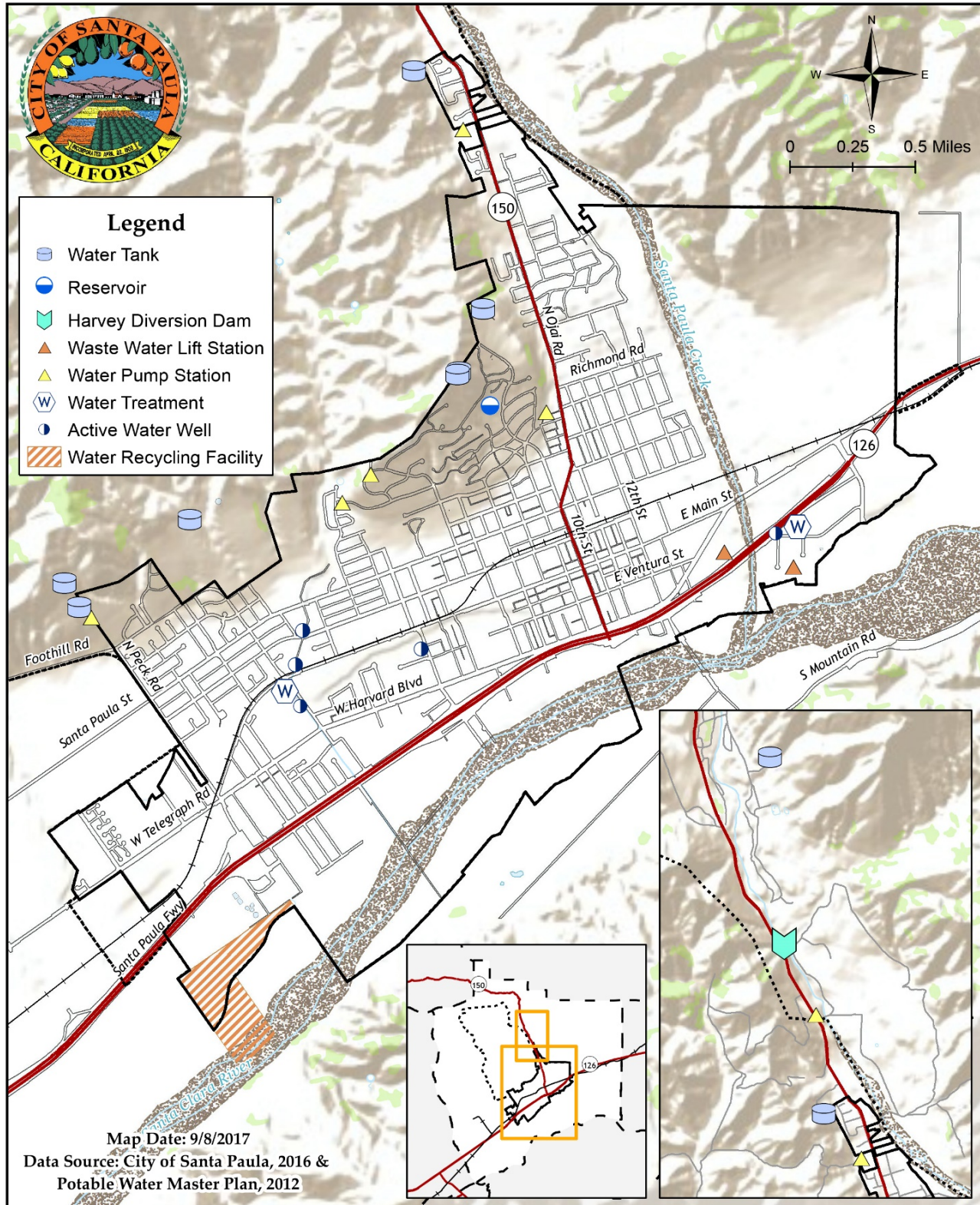


Exhibit 4.18-2 Water and Wastewater Facilities



Current Water Demand. The City serves water to many types of customers, including parks, schools, larger estate-style homes, smaller single-family homes, condominiums, apartments, businesses, and other uses. The distribution system provides domestic water to approximately 7,400 accounts across all customer classifications (see **Table 4.18-1**). Total 2015 water demand within the city was 3,907 AF. Single-family residential represented 87% of the accounts and 54% of the 2015 demand. Multi-family residential represented 2% of the accounts and 22% of the demand. Commercial/Institutional represented 10% of the accounts and 13% of the demand.

Table 4.18-1 Santa Paula Water Accounts and Demand (2015)

Customer Classification	Number of Accounts	Demand (AFY)
Single Family Residential	6,427	2,106
Multi-Family Residential	176	868
Commercial/Institutional	723	493
Industrial	12	48
Landscape Irrigation	42	49
Other	18	22
Sales to Middleroad Mutual Water Co.	2	44
Estimated Losses	0	277
Total	7,400	3,907

Source: 2016 Santa Paula Urban Water Management Plan (August 2017), Table ES-1

Recycled Water Use. Construction of the City's Water Recycling Facility (WRF) was completed in 2010. The WRF produces water that meets California Title 22 regulations for recycled water. Capacity of the WRF is 4.2 MG per day (4,704 AFY). At present, treated effluent from the WRF is discharged to percolation/evaporation ponds, located adjacent to the plant site.

As described in the 2016 UWMP, total estimated urban recycled water demand within the city is estimated to be approximately 2,000 AFY by 2040. The additional urban recycled water demand would be generated entirely within anticipated new developments in the expansion areas. Recycled water is not expected to be provided to existing potable water irrigation systems due to the complexities associated with converting to recycled water use. Recycled water demands from new development could be fully met from the WRF.

Additional demand for recycled water use may come from but is not limited to groundwater recharge, agricultural irrigation, and commercial/industrial recycled water use. As noted in the 2005 Santa Paula Potable Water System Master Plan, the recycled water could be used to supply the Farmer's Irrigation Company or another irrigation water supplier in exchange for additional groundwater basin pumping credits.



Water conservation. Water conservation is an essential component of protecting existing water supplies. Historically, the City of Santa Paula has actively pursued water demand management through a variety of programs aimed at residential, commercial, and industrial customers. For, example, the City’s Water Division actively promotes water conservation by distributing conservation information to its customers through utility bill mailers, online brochures, and the City website. Recommended measures included fixing leaking faucets, pipes, and toilets; replacing old fixtures; installing water-saving devices in faucets, toilets and appliances; running dishwashers and washing machines with full loads; and taking shorter showers. In response to the 2012-2016 California drought, the City’s Public Works Department issued mandatory conservation measures, including limiting outdoor irrigation to 2 days per week; prohibiting landscape watering between 10:00 a.m. and 4:00 p.m.; prohibiting use of potable water for irrigation of ornamental turf on public street medians; and irrigating outdoors within 48 hours of measurable rainfall.

To respond to the possibility of short- or long-term water supply shortages, the 2016 UWMP recommends the development of a water demand reduction program that could be implemented in stages at any time and in any order in response a water supply emergency.

Wastewater

The City of Santa Paula has had a wastewater collection and treatment system since the late 1930s. The City owns and operates the current wastewater system, which consists of approximately 60 miles of collection lines, with pipeline diameters from 6 to 24 inches, 0.5 mile of force mains, two lift stations, and a water recycling facility (see **Exhibit 4.18-2**). City residents generate approximately 2 million gallons per day (MGD) of sewage. Wastewater is delivered by gravity to the Water Recycling Facility (WRF), located in the southwestern portion of the city. The WRF began operations in 2010 and has a normal operating capacity of 3.15 MGD with a final buildout capacity of 4.2 MGD, and a peak operating capacity of 7.0 MGD.

Solid Waste

Since 2011 the City of Santa Paula has contracted with a private waste hauler for solid waste collection and disposal services. Santa Paula is served by two solid waste disposal/landfill sites and one recycling and transfer station.

1. The Toland Road Landfill, located at 3500 North Toland Road in unincorporated Ventura County between Santa Paula and Fillmore, is open to residents of the Santa Clara Valley (for direct haul loads). Commercial loads that are processed through transfer stations or materials recycling facilities in Ventura County are also accepted at the landfill. The landfill and the property are owned and



managed by the Ventura Regional Sanitation District, with oversight by the County Planning Division and the County Environmental Health Division.

The landfill is a Class III landfill and accepts mixed municipal, construction/ demolition, agricultural, industrial, and biosolid waste. Hazardous wastes are not accepted. Total capacity of the landfill is 30 million cubic yards with a remaining capacity of 10.4 million cubic yards as of June 2016. The County has estimated that the landfill will reach capacity in approximately 2028.¹⁷⁸

2. Chiquita Canyon Landfill, located in Los Angeles County approximately 10 miles east of Piru, is a Class III landfill that accepts mixed municipal waste, green materials, construction/ demolition, industrial, and inert waste. The landfill is owned and operated by Chiquita Canyon, Inc. In 2017 Los Angeles County approved a permit allowing the landfill to accept an average of 8,974 tons per day through 2024 and an average of 5,769 tons per day from 2025 through 2047.¹⁷⁹
3. The Del Norte Regional Recycling and Transfer Station, located in Oxnard, is a regional materials recovery facility (MRF) owned and operated by the City of Oxnard. The facility provides transfer and recycling services of up to 2,779 tons per day and accepts refuse, yard and green waste, scrap wood, demolition debris, tires, refrigerators, air conditioners, bulky items, and recyclables.¹⁸⁰

Recycling Programs. The primary goal of recycling programs is to reduce the amount of solid waste that would otherwise end up in a landfill. Goals are typically expressed as a percentage of waste stream diversion.

Santa Paula's waste collection hauler is required to comply with the diversion goal of 60%. The contractor provides curbside automated residential waste pickup once a week for recyclables, green waste, and solid waste. The company also offers bulky item collection to residents on an on-call basis and conducts periodic drop-off events throughout the year. The recyclable material is delivered to Del Norte Regional Recycling and Transfer Station in Oxnard for processing.

Hazardous Waste. Hazardous wastes are materials that have the potential to threaten human health and/or the environment. These wastes may be flammable, toxic, or corrosive and should not be disposed of with non-hazardous solid waste. There are 117 facilities in Ventura County that collect and/or transfer hazardous wastes, five of which are located in Santa Paula (**Table 4.18-2**).

178 County of Ventura, 2040 General Plan Background Report, Revised Public Review Draft, October 2017, p. 7-33

179 <http://chiquitacanyon.com/>

180 County of Ventura, 2040 General Plan Background Report, Revised Public Review Draft, October 2017, p. 7-34



Table 4.18-2 Hazardous Waste Collection Facilities in Santa Paula

Facility Name	Address	Activities
AutoZone	159 E. Harvard Blvd.	Used oil collection
City of Santa Paula	903 Corporation Ave.	HHW/E-waste collection
O'Reilly Auto Parts	275 W Harvard Blvd.	Used oil collection
Santa Paula Chevrolet	101 W Harvard Blvd.	Used oil collection
Santa Paula Clinic	1334 E Main St.	Medication collection, sharps collection

Source: Cal Recycle, Facility Information Toolbox 2016

Regulatory Framework

Water

Federal

Safe Drinking Water Act, Title XIV of The Public Health Service Act: Safety of Public Water Systems. The Safe Drinking Water Act (SDWA) is a federal law originally enacted by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The law was amended in 1986 and 1996 and requires many actions to protect drinking water and its sources – rivers, lakes, reservoirs, springs, and groundwater wells. (SDWA does not regulate private wells that serve fewer than 25 individuals.) Under the SDWA, Environmental Protection Agency sets standards for drinking water quality and, with its partners, implements technical and financial programs to ensure drinking water safety.¹⁸¹

State

Urban Water Management Planning Act. State law¹⁸² requires that urban, rather than agricultural, water suppliers with more than 3,000 customers or who deliver more than 3,000 acre-feet of water per year (AFY) adopt water management and conservation plans that evaluate water supplies and water demands for a 20-year period. Urban Water Management Plans (UWMPs) are to be updated every 5 years or when there are significant changes in available supplies or demands.

UWMPs are intended to guide the actions of water management agencies. They provide managers and the public with a broad perspective on a number of water supply issues. However, they are not a substitute for project-specific planning documents. When specific projects are implemented, detailed project plans are developed, environmental analysis, if required, is prepared, and operational plans are

¹⁸¹ <https://www.epa.gov/sites/production/files/2015-04/documents/epa816f04030.pdf>

¹⁸² *California Water Code* §10610 et seq.



detailed. From this perspective, it is appropriate to look at the UWMP as a general planning framework rather than a specific action plan.

UWMPs generally seek to answer a series of water planning questions including:

- What are the potential sources of supply and what is the reasonable probable yield from them?
- What is the probable demand, given a reasonable set of assumptions about growth and implementation of good water management practices?
- How well do supply and demand projections match up, assuming that the various probable supplies will be pursued by the implementing agency?

Based on the UWMP, water suppliers explore enhancing basic supplies from a variety of sources such as groundwater extraction, water exchanges and transfers, water conservation, and recycling. The Santa Paula UWMP was last updated in 2016 (see additional discussion below).

Sustainable Groundwater Management Act. The Sustainable Groundwater Management Act (SGMA) of 2014¹⁸³ provides a framework for sustainable management of groundwater supplies. The legislation requires the formation of local groundwater sustainability agencies (GSAs) to address groundwater basins determined by the state to be of high or medium priority. The Santa Paula Groundwater Basin has been designated as medium priority along with six other basins in Ventura County. Five other Ventura County basins have been designated as high priority, and three basins are listed in “critical overdraft.”

The principal goal of the SGMA is to ensure that groundwater basins are managed within the sustainable yield of each basin. The legislation defines *sustainable groundwater management* as “the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results, which are defined as any of the following: chronic lowering of groundwater levels; significant and unreasonable reductions in groundwater storage; significant and unreasonable seawater intrusion; significant and unreasonable degradation of water quality; significant and unreasonable land subsidence; and surface water depletions that have significant and unreasonable adverse impacts on beneficial uses.”

GSAs are empowered to utilize a number of management tools to achieve sustainability goals. Examples include: requiring registration of groundwater wells, mandating

183 <http://groundwater.ca.gov/legislation.cfm>



annual extraction reports from individual wells, imposing extraction limits, and assessing fees to support creation and adoption of a groundwater sustainability plan (GSP). GSAs may also request the revision of a groundwater basin boundary.

The SGMA amends state planning and zoning laws to require increased coordination among land use planning agencies and GSAs regarding groundwater plans and any updates or modifications of General Plans. Existing local government land use and groundwater authorities are not modified by the Act.

GSA formation notices have been filed with the Department of Water Resources (DWR) for the adjacent Mound and Fillmore/Piru Groundwater Basins along the Santa Clara River. However, because the Santa Paula Groundwater Basin is listed in the Act as an adjudicated basin, it is not required to form a GSA or develop a GSP. It is required only to submit an annual report to the DWR that contains much of the same information already required by the court.

SBX7-7 Water Conservation Act. The Water Conservation Act of 2009 mandates water conservation targets and efficiency improvements for urban and agricultural water suppliers, respectively. The legislation sets a goal of achieving a 20% statewide reduction in urban per capita water use and directs urban retail water suppliers to set 2020 urban water use targets. As required by the law, water conservation targets for Santa Paula are reported in the 2016 Santa Paula UWMP.

General Plan Law. Section 65302(a) of the *California Government Code* lists watersheds as a resource that must be planned for in the Land Use Element. Section 65302(d)(1) requires the topic of water and its hydraulic force to be addressed in the Conservation Element. The discussion of water in the Conservation Element must be prepared in coordination with “any countywide water agency and with all district and city agencies, including flood management, water conservation, or groundwater agencies that have developed, served, controlled, managed, or conserved water of any type for any purpose in the county or city for which the plan is prepared,” and must include any information on water supply and demand prepared pursuant to *Government Code* §65352.5.

Local

Santa Paula Municipal Code. Municipal Code Chapter 52 (Water) establishes regulations regarding water supply in Santa Paula. Section 52.038 states, “No person shall lawfully or neglectfully wastewater in any manner whatsoever. Continued wasting of water after mailing of [City] notice by registered mail to the customer of record at the mailing address of record by the [City] Director may result in



discontinued water service.” The Code is a beneficial tool to curb misuse and waste of potable water within the city. The provisions of the Code can be utilized during periods of normal water supply and supply deficiency. Violation of the Code is subject to City penalties.

Municipal Code Chapter 58 (Water Conservation) establishes mandatory water conservation requirements including repair of water leaks (including leaking pipes, faucets, plumbing fixtures, other water service appliances, sprinklers, watering or irrigation systems, or distribution systems) and restrictions on landscape watering, commercial car washes, washing/cleaning of equipment or structures, cleaning of outdoor surfaces, swimming pools and spas, fountains and ponds, commercial laundry facilities, restaurants and visitor serving facilities and construction (Sections 58.01–58.23). Section 58.21 of the Code authorizes the City Council to impose reductions in the use of water if such reductions are necessary to comply with water use restrictions imposed by federal, state or regional water agencies or to respond to emergency water shortage conditions.

Municipal Code Chapter 59 (Landscape Water Conservation Standards) was adopted in 2009 in accordance with *California Government Code* §65595(c) to comply with California law and promote water conservation in the design, installation, and maintenance of landscape irrigation systems.

Santa Paula Urban Water Management Plan. The Santa Paula 2016 Urban Water Management Plan (UWMP), adopted in August 2017, was prepared to comply with *California Water Code* §§10610-10656, which requires urban water suppliers to prepare a UWMP to promote water conservation and efficient water use. The 2016 UWMP provides planning information on the reliability and future availability of the city’s water supply.

The UWMP is a public statement of goals, objectives, and strategies needed to maintain a reliable water supply for the city’s urban customers. It is intended to serve as a long-term, general planning document, rather than as policy for supply and demand management.

Santa Clara River Enhancement and Management Plan. The Santa Clara River Enhancement and Management Plan (SCREMP) was jointly published in 2005 by the Ventura County Watershed Protection District and the Los Angeles County Department of Public Works. The City of Santa Paula was a member of the Steering Committee for this project. The stated purpose of the SCREMP was “to provide a guidance document for the preservation, enhancement, and sustainability of the



physical, biological, and economic resources that occur within the 500-year floodplain limits of the Santa Clara River mainstem that will be of benefit to Stakeholders when planning and implementing projects and activities.” The SCREMP is not a regulatory document, but provides recommended policies and programs regarding water quality, water supply, groundwater, flood control, biological habitat conservation, recreation, aggregate resources (sand and gravel), and cultural resources.

Wastewater

Federal

Clean Water Act (CWA). Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. Where multiple uses exist, water quality standards must protect the most sensitive use. The EPA Office of Wastewater Management (OWM) supports the CWA by promoting effective and responsible water use, treatment, disposal and management, and by encouraging the protection and restoration of wetlands. The OWM is responsible for directing the National Pollutant Discharge Elimination System (NPDES) permit, pretreatment, and municipal bio-solids management (including beneficial use) programs under the CWA. The OWM also administers the Clean Water State Revolving Fund, which focuses on funding wastewater treatment systems, non-point source projects, and estuary protection.

State

State Water Resources Control Board. The State Water Resources Control Board (SWRCB), in coordination with nine Regional Water Quality Control Boards (RWQCBs), performs functions related to water quality, including implementation and compliance with the provisions of the federal CWA, issuance of NPDES permits and other programs on storm water runoff, and underground and above-ground storage tanks. Santa Paula lies within the jurisdiction of the Los Angeles RWQCB.

California Code of Regulation, Title 22. Title 22 establishes state guidelines for how treated and recycled water is discharged and used. State discharge standards for reclaimed water and its reuse are regulated under the Water Recycling Criteria and the 1969 Porter-Cologne Water Quality Control Act, which constitute California’s regulatory framework for water recycling. Effluent treatment standards are set and enforced by the regional water quality control boards in consultation with the California Department of Public Health.

General Plan Law. Section 65302(d)(1) of the *California Government Code* requires the topic of water and its hydraulic force to be addressed in the Conservation Element of



the General Plan. The discussion of water in the Conservation Element must be prepared in coordination with “any countywide water agency and with all district and city agencies, including flood management, water conservation, or groundwater agencies that have developed, served, controlled, managed, or conserved water of any type for any purpose in the county or city for which the plan is prepared,” and must include any information on water supply and demand prepared pursuant to *Government Code* §65352.5.

Local

Santa Paula Municipal Code. Chapter 51 (Sewer System and Wastewater Disposal) of the Santa Paula Municipal Code regulates sewage, liquid waste and industrial waste discharges directly or indirectly into the sewer system. The ordinance enables the City to comply with applicable federal and state laws required by the Clean Water Act and the requirements of any NPDES permit.

Solid Waste

State

General Plan Law. Section 65302(a) of the *California Government Code* lists solid and liquid waste disposal facilities as a land use that must be planned for in the Land Use Element of the General Plan.

AB 939 (1989). The Integrated Waste Management Act of 1989 (Public Resources Code 40050 et seq.) established a requirement for cities and counties to divert 50% of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. The law requires each city and county to prepare a source reduction and recycling element for review by the California Department of Resources Recycling and Recovery (CalRecycle). AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

AB 1327 (1991). The California Solid Waste Reuse and Recycling Access Act (*Public Resources Code* Sections §§42900, et seq.) required that areas be set aside in development projects for the collection and loading of recyclable materials. The law required the California Integrated Waste Management Board to develop a model ordinance and local agencies are required to adopt either the model or a local ordinance with equivalent requirements.

AB 341 (2011). AB 341 mandated commercial and multi-family residential recycling and requires jurisdictions to implement programs to regulate the recycling through



education, outreach, and monitoring. The statute set a statewide goal of 75% disposal reduction by the year 2020. The requirement of disposal reduction for jurisdictions remained at 50%.

AB 1826 (2014). AB 1826 required local jurisdictions to implement an organic waste recycling program for businesses to divert organic waste. The law will be phased in, with milestone dates between 2016 and 2021 detailing when jurisdictions must provide information about their organic waste recycling programs to CalRecycle for review.

California Code of Regulation (CCR), Title 24 Part 11 §5.408. The California Green Building Standards Code requires that at least 50% of nonhazardous construction and demolition waste from non-residential construction be recycled or salvaged for reuse.

California Code of Regulation (CCR), Title 27 §§21600-21900 and Title 13 §§178-17869. Title 27 regulates solid and hazardous waste transfer and disposal facilities. Facilities are regulated jointly by the Regional Water Quality Control Board (RWQCB) and CalRecycle. Title 13 regulates compost facilities. Permit requests and reports of waste discharge and disposal site information are submitted to the RWQCB and CalRecycle and are used by the two agencies to review, permit, and monitor these facilities. In Ventura County, the Local Enforcement Agency (LEA) is the County Environmental Health Division/Solid Waste Program. The Ventura County Public Works Agency and the Integrated Waste Management Division operate the solid waste landfills within the county and assist in implementing solid waste landfill diversion goals.

Local

Santa Paula Municipal Code. Municipal Code Chapter 50 (Integrated Waste Management) establishes regulations regarding solid waste disposal and recycling, including residential and commercial waste, hazardous waste, waste hauler franchises, recycling, construction and demolition waste, green waste, and waste fees.

4.18-2 Thresholds of Significance

Thresholds related to utilities are based upon the CEQA Guidelines (Appendix G). Based on these questions, a project may have a significant effect on the environment if it would:

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



effects; (Impacts UTIL-1 and UTIL-2) *Note: Stormwater drainage facilities are addressed in Section 4.10.*

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years; (Impact UTIL-1)
- c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; (Impact UTIL-2)
- d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; (Impact UTIL-3)
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste. (Impact UTIL-3)

4.18-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to water supply, wastewater treatment and solid waste expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.

UTIL-1: Sufficient water supplies available to serve the project

Impact Discussion

Project Impacts.

Future Water Demand. Estimated future water demand is analyzed in the 2016 *Santa Paula Urban Water Management Plan* (UWMP) and is based on the City's current General Plan and the SCAG 2016-2040 Regional Growth Forecast.¹⁸⁴ Future water requirements are estimated according to projected land use, population and water demand characteristics and assume a population of 39,600 for Santa Paula by 2040. These projections include the expansion areas identified in the existing General Plan. Future water demands were obtained by multiplying the anticipated units of each land use classification by the recommended water demand rates, then adding these future demands to existing water demand requirements.

¹⁸⁴ As noted in **Section 2– Project Description**, anticipated growth under the proposed 2040 General Plan is consistent with the SCAG 2016-2040 RTP/SCS



Table 4.18-3 shows that total potable water demand (existing plus potential) was estimated to be 3,907 AF in 2015 and is projected to increase to 5,416 AF by 2040.

Table 4.18-3 Projected Santa Paula Potable Water Demands 2020-2040

Water Use Sector	2015 AFY 1	2020 AFY 1	2040 AFY 1
Single Family	2,106	2,285	3,000
Multi Family	868	941	1,233
Commercial/Institution/Mixed Use	493	527	662
Industrial	48	50	57
Landscape Irrigation ²	49	49	49
Other	22	22	22
Sales to Middleroad Mutual Water Co. ³	44	44	44
Potable Water Losses	277	291	349
Total Demand (AFY)⁴	3,907	4,209	5,416

Source: City of Santa Paula 2016 Urban Water Management Plan, August 2017 (Table ES-3)

1 AFY = acre-feet per year

2 Assumes existing landscape areas with irrigation will remain on potable water until such time that areas are converted to recycled water

3 Sales to Middle Road Mutual Water Company

4. Based upon a normal water year

Future Water Supply. The City anticipates that groundwater extractions will continue to be the primary source of water supply through 2040. The City's water supply in 2040 (**Table 4.18-4**) is projected to be 6,060 AFY from existing sources. This exceeds the projected 2040 potable water demand of 5,416 AFY. When other potential water sources are included, the total projected water supply is projected to be 10,295 AFY in 2040. Therefore, projected water supply is expected to be adequate to meet projected demand in 2040.

Table 4.18-4 Projected Santa Paula Potable Water Supply 2020-2040

Water Supplies	2020 AFY 1	2040 AFY 1
Existing		
City wells	5,560	5,560
Santa Paula Creek	500	500
Subtotal - Existing	6,060	6,060
Potential		
Transferred groundwater allocations	348	1,738
Purchased groundwater allocations	100	497
Recycled water	400	2,000
Subtotal - Potential	848	4,235
Total Supply	6,908	10,295

Source: Santa Paula 2016 Urban Water Management Plan, August 2017 (Table ES-4)

The UWMP also evaluated water demand and supply under "single dry water year" and "multiple dry water year" scenarios and concluded that water supply would exceed demand



in 2040 under these scenarios.¹⁸⁵ Therefore, no new water entitlements are expected to be needed to serve anticipated development in the 2040 General Plan horizon year. Proposed General Plan policies and programs (**Table 4.18-5**) would establish effective mechanisms to ensure that adequate water supply is available to serve new development, thereby substantially reducing potential impacts from development as anticipated in the 2040 General Plan to a level that is less than significant.

Table 4.18-5 General Plan Policies and Programs Related to Water Supply and Wastewater Treatment

Policies	Programs
PSU 7.1 Ensure adequate water supply and wastewater treatment capacity. Ensure that adequate water supply and wastewater treatment capacity will be available to support Santa Paula's current and future needs through conservation, wise ground-water management, protection of aquifer recharge areas, and upgrading and expansion of the water distribution and wastewater treatment systems. Require new development to contribute its fair share to the cost of providing the additional water and wastewater treatment capacity required to serve the development.	<p>PSU 7.a Water and Wastewater Plans. Prepare and regularly update an Urban Water Management Plan and a Wastewater Master Plan identifying the city's water needs, water sources, water and wastewater infrastructure requirements and funding mechanisms to ensure that adequate, safe water supplies and wastewater treatment capacity will be available to serve existing and future development. When new or upgraded facilities are necessary, ensure that they are incorporated into the City's Capital Improvement Program.</p> <p>PSU 7.b Development review. As part of the review process for new developments, assist applicants in demonstrating compliance with all policies and standards related to water supply and wastewater treatment.</p> <p>PSU 7.c Water conservation. Encourage water conservation through compliance with building and landscaping codes, use of reclaimed water, and public information.</p>

The UWMP indicates that additional wells will need to be added to the City's water system as new development occurs, consistent with groundwater allocations. In addition, construction of new water lines or replacement of existing water lines would be required. Development of new, expanded or replacement water facilities could result in potentially significant impacts; however, such projects must comply with all applicable construction and environmental regulations (e.g., air quality standards, water quality regulations, etc.) that apply to other types of development activities. Compliance with those requirements, which are discussed in each topical section of this EIR, will be demonstrated through project-level environmental review in conformance with CEQA at the time site-specific project plans are prepared, and mitigation measures may be required to avoid or reduce potential adverse environmental effects related to those projects.

185 2016 UWMP, Tables ES-6 and ES-7



Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to water supply.¹⁸⁶ This conclusion is based upon projected 2040 regional water demand that exceeds identified supplies. The proposed Santa Paula 2040 General Plan is consistent with RTP/SCS; however, since local water supplies are projected to be adequate to serve Santa Paula's projected 2040 demand, the proposed policies and programs would reduce the incremental effects of implementation of the 2040 General Plan related to water supply to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

UTIL-2: Wastewater treatment capacity

Impact Discussion

Project Impacts.

Wastewater Treatment Capacity. Development anticipated under the proposed 2040 General Plan would result in an increase in wastewater flows as compared to current levels. Current regulations described in the Regulatory Setting, above, establish water quality standards for wastewater treatment and disposal; therefore, required compliance with these standards would reduce potential impacts associated with wastewater disposal to a level that is less than significant.

The City Water Recycling Facility (WRF) has a normal operating capacity of 3.15 MGD with a final buildout capacity of 4.2 MGD, and a peak operating capacity of 7.0 MGD. The City's 2012 Wastewater System Master Plan (WSMP) estimated future wastewater flows of approximately 0.93 MGD for the expansion areas as summarized in **Table 4.18-6**.

¹⁸⁶ SCAG 2016-2040 RTP/SCS PEIR, p. 3.18-42



Table 4.18-6 Projected Expansion Area Wastewater Flows

Expansion Area	Land Use Type	Basis	ERUs	Average Flow (MGD)
Fagan Canyon	Single-family residences	450 units	450	0.1339
	Commercial	1.75 acres	12	0.0036
	Schools	10 acres	60	0.0179
	Golf courses/landscaped commons	238 acres	0	0.0000
	Subtotal – Fagan Canyon		522	0.1553
Adams Canyon	Single-family residences	495 units	495	0.1473
	Commercial	0	0	0
	Schools	0	0	0
	Golf course/parks/landscaped area	0	0	0
	Subtotal – Adams Canyon		495	0.1473
East Area 1	Residential	1,500 units	1,500	0.4463
	Commercial	435,000 SF	60	0.0179
	Schools	8.5 acres	52	0.0155
	Parks/landscaped commons	163.5 acres	0	0.0000
	Subtotal – East Area 1		1,612	0.4796
East Area 2	Commercial/Industrial	1,000,830 SF	221	0.0657
	Subtotal – East Area		221	0.0657
West Area 2	Commercial/Industrial	1,900,000 SF	275	0.0818
	Parks/open space	125 acres	0	0.0000
	Subtotal – West Area 2		275	0.0818
South Mountain	Golf course/parks	15 acres	0	0.0000
	Subtotal – South Mountain			0.0000
Expansion Area Totals			3,125	0.9297

Total wastewater flow based on buildout of the entire city was projected to be approximately 3.61 MGD. This projected flow is considered to be a conservative estimate (i.e., higher than expected) and is well within the WRF final buildout capacity of 4.2 MGD.¹⁸⁷ Therefore, development anticipated under the 2040 General Plan is not expected to require expansion of the WRF beyond the level currently planned. In addition, each development proposal is reviewed by the City to confirm that sufficient wastewater treatment capacity exists to serve the additional flows generated by the project.

Recycled Water Use. The WRF produces water that meets California Title 22 regulations for recycled water. At present, treated effluent from the WRF is discharged to percolation/evaporation ponds, located adjacent to the plant site. As described in the 2016 UWMP, total estimated urban recycled water demand within the city is estimated to be approximately 2,000 AFY by 2040. The additional urban recycled water demand would be generated entirely within anticipated new developments in the expansion areas. Recycled water is not expected to be provided to existing potable water irrigation systems due to the

¹⁸⁷ 2012 Santa Paula Wastewater System Master Plan



complexities associated with converting to recycled water use. Recycled water demands from new development could be fully met from the WRF.

The proposed General Plan policies and programs (**Table 4.18-5** above) would establish effective mechanisms to ensure that adequate wastewater treatment capacity is available to serve new development, thereby substantially reducing potential impacts from General Plan adoption to a level that is less than significant.

Planned expansion of the WRF and construction of new wastewater lines or replacement of existing wastewater lines would be anticipated over the proposed General Plan time horizon, although the specific details and timing of those projects have not been determined. Those construction activities could result in potentially significant impacts; however, such projects must comply with all applicable construction and environmental regulations (e.g., air quality standards, water quality regulations, etc.) that apply to other types of development activities. Compliance with those requirements, which are discussed in each topical section of this EIR, will be demonstrated through project-level environmental review in conformance with CEQA at the time site-specific project plans are prepared, and mitigation measures may be required to avoid or reduce potential adverse environmental effects related to those projects.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS would result in less than significant cumulative impacts with respect to wastewater treatment requirements or facilities.¹⁸⁸ The proposed Plan is consistent with RTP/SCS and no further cumulative impact analysis is necessary pursuant to *CEQA Guidelines* Sec 15130(d).

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

¹⁸⁸ SCAG 2016-2040 RTP/SCS PEIR, p. 3.18-35 & 37



UTIL-3: Landfill capacity and compliance with solid waste regulations

Project Impacts. According to the most recent available data (2017) from CalRecycle, most solid waste generated in Santa Paula was disposed at the following four solid waste disposal/landfill sites.

- **Chiquita Canyon Landfill**, located in Los Angeles County approximately 10 miles east of Piru, is a Class III landfill that accepts mixed municipal waste, green materials, construction/ demolition, industrial, and inert waste. The landfill is owned and operated by Chiquita Canyon, Inc. In 2017 Los Angeles County approved a permit allowing the landfill to accept an average of 8,974 tons per day through 2024 and an average of 5,769 from 2025 through 2047.¹⁸⁹
- **McKittrick Waste Treatment Site** is a landfill located in Kern County. The landfill has a maximum permitted capacity of 5.5 million cubic yards and a remaining capacity of 770 cubic yards as of 2012. This landfill is expected to reach capacity in approximately 2059.¹⁹⁰
- **Simi Valley Landfill and Recycling Center (SVLRC)** is a Class III landfill located in the unincorporated area northwest of Simi Valley. The landfill accepts construction/demolition, industrial, mixed municipal, and sludge (biosolids) waste. Hazardous waste is not accepted. The landfill has a total capacity of 119.6 million cubic yards and a remaining capacity of 88.3 million cubic yards as of February 2017. SVLRC is expected to reach capacity in approximately 2052.¹⁹¹
- **Toland Road Landfill**, located east of Santa Paula, is a Class III landfill that accepts mixed municipal, construction/demolition, agricultural, industrial, and biosolid waste. The landfill is owned and managed by the Ventura Regional Sanitation District. Maximum permitted capacity of the landfill is 30 million cubic yards, with a remaining capacity of approximately 10.57 million cubic yards as of 2016. It is estimated that this landfill will reach capacity in approximately 2027.¹⁹²

Santa Paula's total solid waste was approximately 32,119 tons in 2017 with approximately 74% of the total sent to the Toland Road Landfill (**Table 4.18-7**).

189 Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force, Inside Solid Waste, Vol. 91, Summer 2018 (https://dpw.lacounty.gov/epd/tf/isw/isw_2018_08.pdf)

190 CalRecycle, 2018 (<https://www2.calrecycle.ca.gov/SWFacilities/Directory/15-AA-0105/Detail/>)

191 CalRecycle 2018 (<https://www2.calrecycle.ca.gov/swfacilities/Directory/56-AA-0007/>)

192 CalRecycle 2018 (<https://www2.calrecycle.ca.gov/SWFacilities/Directory/56-AA-0005/Detail/>)



Table 4.18-7 Santa Paula Solid Waste Disposal by Facility 2017

Destination Facility	Quantity (tons/year)
Azusa Land Reclamation Co. Landfill	36
Chiquita Canyon Sanitary Landfill	1,393
McKittrick Waste Treatment Site	4,239
Simi Valley Landfill & Recycling Center	2,667
Toland Road Landfill	23,785
Total	32,119

Source: CalRecycle, 2018

<https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility>

Santa Paula Municipal Code Section 50.140 requires permit applicants working on construction, remodeling and/or demolition projects within City limits to practice waste prevention; reuse, recycle or salvage; and, least preferred, landfilling. The Code requires a minimum of 50% diversion of construction and remodeling waste. For construction and demolition activity, developers are required to submit reporting Form A: Certificate of Implementation, and Form B: Waste Reduction & Recycling Summary Report (WRRS), estimating the amount of solid waste that is recycled or otherwise diverted from area landfills. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation.

The City's waste collection hauler is required to comply with a diversion goal of 60%. The hauler provides curbside automated residential waste pickup once a week for recyclables, green waste, and solid waste, and also offers bulky item collection to residents on an on-call basis and conducts periodic drop-off events throughout the year. The recyclable material is delivered to Del Norte Regional Recycling and Transfer Station in Oxnard for processing.

Because several existing landfills serving Santa Paula are projected to have capacity through the proposed 2040 General Plan timeframe, potential impacts on solid waste disposal capacity are considered less than significant. Impacts would be further reduced by required compliance with state laws mandating increased waste stream diversion, which would be supported by proposed General Plan policies and programs (**Table 4.18-8**).



Table 4.18-8 General Plan Policies and Programs Related to Solid Waste

Policies	Programs
PSU 8.1 Minimize solid waste. Support statewide goals for the reduction of solid waste and support recycling programs.	PSU 8.a Encourage recycling. Work cooperatively with the City's solid waste contractor to disseminate information to residents and businesses encouraging recycling through methods such as automated curbside recycling, and green waste collection, and recycling of construction and demolition materials. PSU 8.b Development review. As part of the review process for new developments, assist applicants in demonstrating compliance with all policies and standards related to solid waste collection and recycling.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to solid waste disposal.¹⁹³ The proposed General Plan is consistent with RTP/SCS; however, the proposed policies and programs together with required compliance with existing regulations would reduce the incremental effects of implementation of the 2040 General Plan related to solid waste disposal to a level that is less than cumulatively considerable.

Level of Significance

Less than significant

Mitigation Measures

None required

Level of Significance after Mitigation

Less than significant

¹⁹³ SCAG 2016-2040 RTP/SCS PEIR, p. 3.18-37

4. Environmental Setting and Impact Analysis
4.18 – Utilities and Service Systems



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4.19 Wildfire

This section evaluates potential impacts related to wildland fire hazards, including increased risk of flooding that can result from wildfires.

4.19-1 Setting

Existing Physical Conditions

As described in the 2015 Ventura County Multi-Hazard Mitigation Plan, wildfire is an uncontrolled fire that spreads through vegetative fuels, exploding and possibly consuming structures. Wildfires often begin unnoticed, spread quickly, and are usually signaled by dense smoke that may be visible from miles around. Wildfires can be human-caused by arson or campfires or can be caused by natural events such as lightning. Wildfires can be categorized into four types:

1. *Wildland fires* occur mainly in areas under federal control, such as national forests and parks, and are fueled primarily by natural vegetation.
2. *Interface or intermix fires* occur in areas where both vegetation and structures provide fuel. These are also referred to as urban-wildland interface fires.
3. *Firestorms* occur during extreme weather (typically high temperatures, low humidity, and high winds) with such intensity that fire suppression is virtually impossible. These events typically burn until conditions change or the fuel is exhausted.
4. *Prescribed fires and prescribed natural fires* are intentionally set or natural fires that are allowed to burn for beneficial purposes.

Topography, vegetation type (fuel) and weather contribute significantly to wildfire behavior. If not promptly controlled, wildfire may grow into an emergency or disaster. Even small fires can threaten lives and resources and destroy improved properties.

Wildfires can have serious effects on the local environment. In addition to stripping the land of vegetation and destroying forest resources, large, intense fires can harm the soil, waterways, and the land itself. Soil exposed to intense heat may lose its capacity to absorb moisture and support life. Exposed soils erode quickly and enhance siltation of rivers and streams, thereby enhancing flood potential, harming aquatic life, and degrading water quality. Lands stripped of vegetation are also subject to increased debris flow hazards. Wildfires can also greatly affect the air quality of the surrounding area.

Based on local conditions and the history of occurrence in the past, wildfire events are very likely to occur in the future. In the past, fires burning more than 1,000 acres have occurred about every 1



to 3 years in Ventura County. The extent of future events will depend on specific conditions at the time of the fire.

Fire Hazard Severity Zones. *Public Resources Code §4201-4204 and Government Code §51175-89* direct Cal Fire to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These zones, referred to as Fire Hazard Severity Zones (FHSZs), are represented as very high, high, or moderate. FHSZ maps were created using data and models describing development patterns, potential fuels over a 30- to 50-year time horizon, expected fire behavior, and expected burn probabilities. The maps are divided into local responsibility areas and state responsibility areas. Local responsibility areas generally include cities, cultivated agriculture lands, and portions of the desert. Local responsibility area fire protection is typically provided by city fire departments, fire protection districts, and counties, and by Cal Fire under contract to the local government. *State responsibility area* (SRA) is a legal term defining the area where the State has financial responsibility for wildfire protection. Incorporated cities and federal ownership are not included in SRAs. The prevention and suppression of fires in all areas that are not SRAs are primarily the responsibility of federal or local agencies.

Exhibit 4.19-1 shows FHSZ areas in and adjacent to Santa Paula. According to the 2015 VCMHMP, 0.03% of Santa Paula's population lives within the High FHSZ, and 4.49% lives within the Very-High FHSZ. The VCMHMP also predicts that climate change will result in increased wildfire risk in hillside and mountainous areas.

In December 2017 and January 2018 the Thomas Fire, which began near St. Thomas Aquinas College north of Santa Paula, became the largest wildfire in California's recorded history. Before finally being contained the fire consumed over 280,000 acres (438 square miles), destroyed over 1,000 structures, and killed one fire fighter. While the fire was still active, an intense rainstorm struck the area resulting in massive mudslides that damaged or destroyed hundreds of homes in the Montecito area of Santa Barbara County. After a thorough investigation, the Ventura County Fire Department determined the Thomas Fire was started by high winds, which caused power lines to come into contact with each other creating an electrical arc.¹⁹⁴

¹⁹⁴ <http://www.vcfd.org/news/335-vcfd-determines-cause-of-the-thomas-fire>

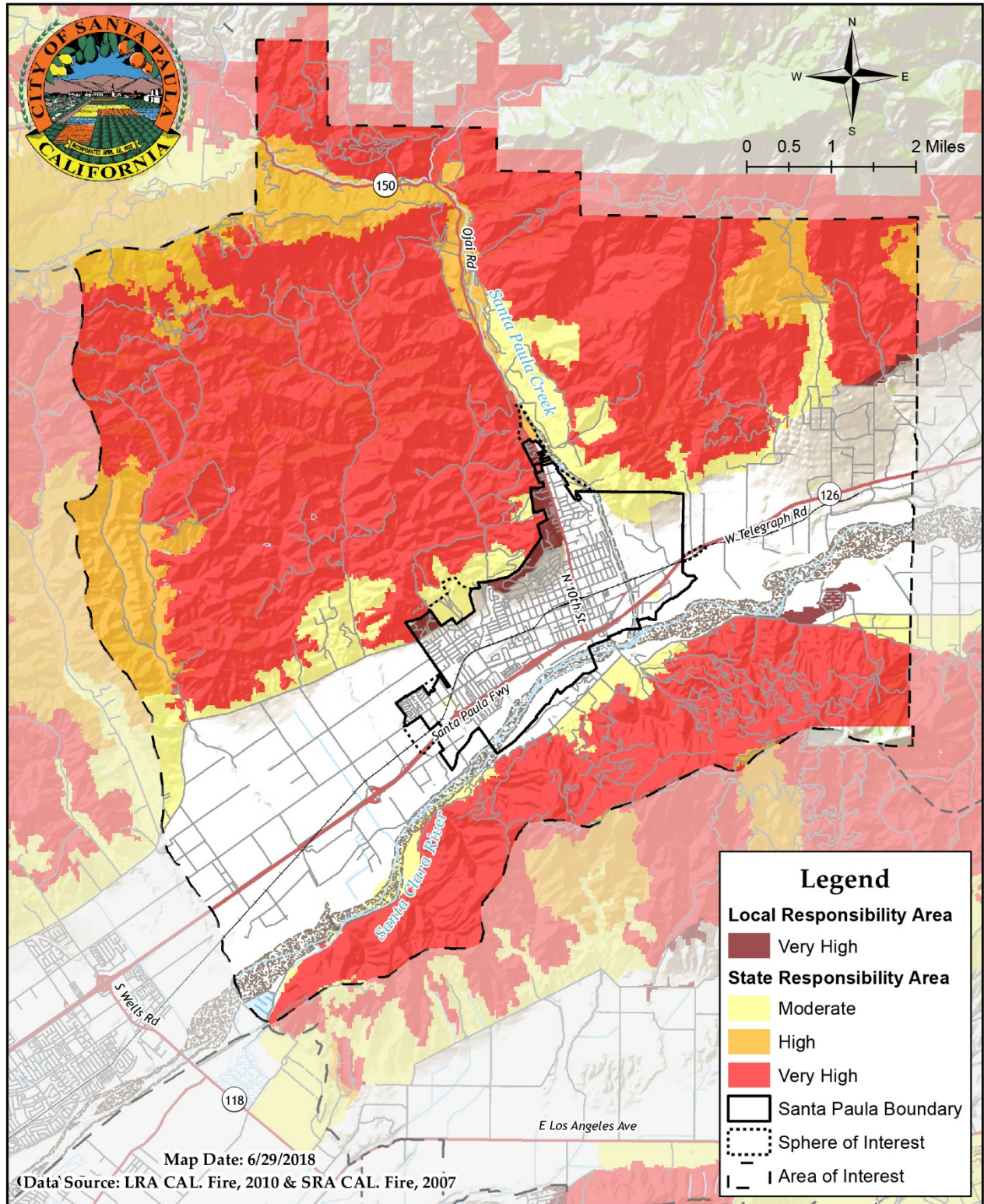


Exhibit 4.19-1 Wildland Fire Hazard Areas



Regulatory Framework

Federal

Disaster Mitigation Act of 2000. (Please see discussion above in the Geologic Hazards section on page 4.8-4.)

Federal Land Assistance, Management, and Enhancement Act. In 2009, Congress passed the Federal Land Assistance, Management, and Enhancement (FLAME) Act as the basis for the U.S. Department of Agriculture (USDA) and the Department of the Interior (DOI) to develop a national cohesive wildland fire management strategy. In response to the FLAME Act, USDA and DOI published the National Cohesive Wildland Fire Management Strategy, which includes the National Strategy and the National Action Plan, both completed in 2014.¹⁹⁵

Healthy Forest Restoration Act. The Healthy Forest Restoration Act (HFRA), enacted by Congress in 2003, established a protocol for the creation of Community Wildfire Protection Plans (CWPPs) for communities at risk from wildland fires. The Ventura County Fire Department has prepared a CWPP for all of Ventura County. As specified by the HFRA, the Ventura County CWPP was developed in collaboration with local, county, state, and federal agencies as well as various community organizations within the county. The CWPP identifies wildfire risks and clarifies priorities for funding and programs to reduce impacts of wildfire on the communities at risk within Ventura County.¹⁹⁵

State

SB 1241 (Government Code §65302[g][3]). SB 1241 requires the Safety Element to address the risk of fire in State Responsibility Areas (SRAs) and “very high fire hazard severity zones” (VHFHSZs). State law also requires cities that contain VHFHSZs to consult with Cal Fire and the State Board of Forestry and Fire Protection as part of Safety Element update process. At least 90 days prior to the adoption or amendment of the Safety Element the draft Element must be submitted for the Board’s review, and the Board must make findings regarding the uses of land and policies in SRAs or VHFHSZs that will protect life, property, and natural resources from unreasonable risks associated with wildfires, and the methods and strategies for wildfire risk reduction and prevention.

Government Code §51175-89. State law directs Cal Fire to map areas of very high fire hazard within LRAs. Mapping of the VHFHSZ areas is based on relevant factors such as fuels, terrain, and weather. VHFHSZ maps were initially developed in the mid-1990s and have

¹⁹⁵ Ventura County 2040 General Plan Background Report, Public Review Draft, March 2017, p. 11-50



been updated based on improved science, mapping techniques, and data.¹⁹⁶ The current FHSZ maps covering the Santa Paula area were adopted in 2007 for SRAs and 2010 for LRAs.

Strategic Fire Plan for California. *California Public Resources Code* §4114 and §4130 authorize the California Board of Forestry and Fire Protection (Board) to establish a fire plan that, among other things, establishes the levels of statewide fire protection services for SRA lands. These levels of service recognize other fire protection resources at the federal and local levels that collectively provide a regional and statewide emergency response capability. In addition, California’s integrated mutual aid fire protection system provides fire protection services through automatic and mutual aid agreements for fire incidents across all ownerships.

In 2010 the Board adopted the Strategic Fire Plan for California. This statewide fire plan was developed in concert between the Board and Cal Fire, in consultation with a group of outside experts to complete a needs assessment and to form the Fire Plan Steering Committee. The Strategic Fire Plan seeks to protect lives, residential property, and natural resources. It is the basis for assessing California’s complex and dynamic natural and man-made environment and identifying a variety of actions to minimize the negative effects of wildland fire. Implementation of the 2010 Strategic Fire Plan is intended to occur at all levels of Cal Fire, as well as through partnerships with local, state, and federal agencies, private organizations (e.g., Fire Safe Councils, homeowners’ associations, industry) and citizens.¹⁹⁷

SB 1704 (Vegetation Management Program). Senate Bill 1704 of 1980 establishes the basic processes and procedures consistent with the need to manage chaparral-covered and associated lands within California. The Vegetation Management Program allows private landowners to enter into a contract with Cal Fire to use prescribed burns to accomplish a combination of fire protection and resource management goals. The main goals of the program are the reduction of conflagration fires, the optimization of soil and water productivity, and the protection and improvement of intrinsic floral and faunal values.

Public Resources Code §4291/Government Code §51182. *Public Resources Code* §4291 and *Government Code* §51182 require property owners in mountainous areas, forest-covered, lands, or any land that is cover with flammable material to create at minimum a 100-foot defensible space (or to the property line) around their homes and other structures. Under the law, property owners or those who control property must establish a 30-foot clean zone and a 70-foot reduced fuel zone.¹⁹⁷

¹⁹⁶ Cal Fire Fire and Resource Assessment Program, Very High Fire Hazard Severity Zones in LRA, Santa Paula, 2010
¹⁹⁷ Ibid., p. 11-51



California Fire Safe and Defensible Space Regulations. *California Code of Regulations Title 14, Division 1.5, Chapter 7, Subchapters 2 and 3* establish regulations related to wildland fire protection and defensible space requirements in State Responsibility Areas (SRAs).

State Building Codes. Beginning in 2008, California Building Code Chapter 7A required new buildings in VHFHSZs to use ignition-resistant construction methods and materials. The new codes include provisions to improve the ignition resistance of buildings, especially from firebrands. VHFHSZ maps are used to identify properties that must comply with natural hazards disclosure requirements at time of property sale and 100-foot defensible space clearance.

Local

Ventura County Multi-Hazard Mitigation Plan (MHMP). This 2015 MHMP addresses the local mitigation planning requirements of the Disaster Mitigation Act of 2000 for unincorporated Ventura County and other local participants (including the City of Santa Paula). The MHMP includes an analysis of vulnerability, a capability assessment for hazard mitigation, a mitigation strategy for reducing potential losses identified in the vulnerability analysis.

VCFD Unit Strategic Fire Plan. Ventura County maintains a contractual relationship with Cal Fire. A Unit Plan that is part of the California Strategic Fire Plan is used within the Ventura County Unit. The Unit Fire Plan also serves as the Community Wildfire Protection Plan (CWPP) for the county. The CWPP identifies wildfire risks and clarifies priorities for funding and programs to reduce impacts of wildfire on the communities at risk within Ventura County. Building on the proven and highly effective Weed Abatement Program implemented by Ventura County Fire Department under the authority of the Healthy Forests Restoration Act, the County's CWPP documents and prioritizes the projects that stakeholders within communities at risk have identified.¹⁹⁸ The City of Santa Paula is a member agency of VCFD.

VCFD Fire Hazard Reduction Program. VCFD adopted a local ordinance that, among other things, requires mandatory 100 feet of brush clearance around structures located in or adjacent to Hazardous Fire Areas. The Fire Hazard Reduction unit manages this requirement throughout the VCFD jurisdiction. Failure to comply with the program by the annual June 1 deadline can result in the Fire District completing the work and assessing a fee to the homeowner through a property tax lien. The role of individual property owners in responding to fire hazards is probably the most critical. Because of the large size of the

¹⁹⁸ Ibid., p. 11-52



county and the preference of many homeowners to build within or adjacent to Hazardous Fire Areas, these individuals must assume responsibility for the prevention of conditions that may result in property damage during the fire season. Measures that may be taken by property owners include planting fire-resistant landscaping, landscape maintenance, mandatory clearance of brush around structures, and site design.¹⁹⁸

Santa Paula Municipal Code. The Municipal Code includes land use and building regulations that mitigate potential impacts related to wildland fire hazards, most notably Title XV, Section 150.040 (International Wildland-Urban Interface Code).

4.19-2 Thresholds of Significance

In accordance with Appendix G to the CEQA Guidelines, the Proposed Project would have a significant impact if it would cause any of the following conditions to occur:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan (This topic is addressed in **Section 4.9 – Hazards and Hazardous Materials, Impact HAZ-5**);
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; (Impact WF-1);
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; (Impact WF-2);
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. (Impact WF-3)

4.19-3 Environmental Impact Analysis

Methodology and Assumptions

The following analysis evaluates impacts related to wildfire expected to result from implementation of the proposed 2040 General Plan according to the thresholds of significance described above. The geographic scope for the analysis of Project impacts is the Santa Paula Area of Interest (see **Exhibit 3.2-2**), while the geographic scope for cumulative impacts is the entire SCAG region.



Impact WF-1: Exacerbate wildfire risk and related exposure to pollutants

Impact Discussion

Project Impacts. As shown in **Exhibit 4.19-1**, portions of Santa Paula’s Expansion Areas (primarily Adams Canyon and Fagan Canyon) are located within Moderate, High and Very High Fire Hazard State Responsibility Areas, and some areas within the City limits and Sphere of Influence along the northern City boundary are designated Very High Fire Hazard Local Responsibility Areas or Moderate, High or Very High Fire Hazard State Responsibility Areas.

New development within designated fire hazard zones would exacerbate risk from wildfire and related pollutants by placing additional structures and people in those high-risk areas. Policies and programs in the proposed General Plan (**Table 4.19-1**) would reduce this risk by requiring new developments within the fire hazard areas to include effective mitigation to minimize wildland fire risks in compliance with State and local regulations. However, while implementation of these policies and programs would substantially reduce risk, impacts resulting from new development within the Very High Fire Hazard Zone as proposed in the General Plan would still be considered significant.

Table 4.19-1 General Plan Policies and Programs Related to Wildland Fire Hazards

Policies	Programs
<p>HPS 3.1 Land use planning. Reduce wildland fire hazards by locating development in areas where such risks can be mitigated to an acceptable level. When feasible, locate new essential public facilities, including hospitals and health care facilities, emergency shelters, police and fire stations, emergency command centers, and emergency communications facilities, outside of high fire hazard zones. If essential facilities must be located in high fire hazard zones, require all feasible mitigation measures to minimize hazards, such as safe access for emergency response vehicles, visible street signs, and water supplies for structural fire suppression. In the event that structures are destroyed by wildfire, ensure that reconstruction adheres to current building standards and evaluate soil stability resulting from loss of vegetation to minimize future risks.</p> <p>HPS 3.2 Enforce State regulations. New development within high and very high fire hazard severity zones must comply with State fire safe and defensible space regulations and standards (including Public Resources Code Sec. 4290-4291 and Government Code Sec. 51182), and local ordinances such as the Ventura County Fire Apparatus Access Code and the Ventura County Fire Code, including fire resistive construction and landscaping, and demonstrate that adequate fire protection access and suppression services will be available to serve the development.</p>	<p>HPS 3.a Fire hazard maps and regulations. Review wildland fire hazard maps and State regulations annually and ensure that the most recent regulations and sources of information are incorporated into City plans and regulations.</p> <p>HPS 3.b Building and fire codes. Update the City’s building and fire codes concurrent with each triennial update of the State codes.</p> <p>HPS 3.c Development review. As part of the development review process, assist applicants in demonstrating conformance with all applicable fire protection regulations and identify appropriate mitigation measures. For any proposed development within a Very High Fire Hazard Severity Zone, require preparation of a site-specific Fire Protection Plan in compliance with applicable State regulations (including Government Code Sec. 51182) and VCFD ordinances, standards and guidelines to address wildland fire prevention, maintenance and operational measures, including community fire breaks, visible home and street addressing and signage, and simultaneous ingress of emergency vehicles and egress of evacuees during a wildfire event. If supplemental stored water is necessary to provide adequate fire protection, require that water tanks on private property are accessible to the Fire Department.</p> <p>HPS 3.d Water supply. Fire protection water supply infrastructure needs in the expansion areas shall be reviewed by the Public Works Department and the Ventura County Fire</p>



Policies	Programs
<p>HPS 3.3 Water supply. Adequate water supply for firefighting must be provided in all new development. New development in urban/wildland interface areas should have supplemental stored, dedicated firefighting water supplies and outside fire sprinkler systems.</p> <p>HPS 3.4 Fire stations. Consider a future fire station location(s) closer to the urban/wildland interface currently existing along State Route 150, or in canyon areas proposed to be developed, and outside of the 100-year flood zone, dam inundation, and seismically-induced liquefaction hazard areas.</p>	<p>Department as part of each update to the Capital Improvement Program.</p> <p>HPS 3.e Fire hazard mitigation. Continue to enforce Fire Code requirements for defensible space, site maintenance, and other fire hazard mitigations in developed areas.</p> <p>HPS 3.f Emergency Operations Plan. Ensure that effective measures to respond to wildland fire risks are included in the City's Emergency Operations Plan, including evacuation when necessary (Annex A of the City Emergency Operations Plan). Evaluate areas of the city within the Very High Fire Hazard Severity Zone and identify any areas with inadequate access/evacuation routes. If such areas exist, develop mitigation measures or improvement plans.</p> <p>HPS 3.g Buffer zones. Identify effective methods of establishing buffer zones separating residential development in the foothills from chaparral and other native vegetation. This may include property easements and setbacks in new subdivisions, acquisition of lands adjacent to existing development, establishment of a "fire break" or National Forest lands, or other techniques. Identify methods to fund acquisition and maintenance of the buffer zones. Coordinate with VCFD and other fire protection agencies regarding ongoing maintenance of fire breaks.</p> <p>HPS 3.h Monitor fire protection service levels and upgrade substandard facilities. As part of the annual budget and Capital Improvement Program process, review fire protection and emergency service levels to ensure that desired service levels are achieved. Whenever feasible, mitigate existing non-conforming development and facilities to contemporary fire safe standards.</p> <p>HPS 3.i Public outreach. Promote public outreach regarding defensible space and evacuation routes in high fire hazard areas, including specific information targeted to at-risk populations such as the elderly and persons with disabilities.</p>

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to wildland fire hazards.¹⁹⁹ Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan, impacts would remain cumulatively considerable.

Level of Significance

Potentially significant

¹⁹⁹ SCAG 2016-2040 RTP/SCS PEIR, p. 3.9-42



Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs

Level of Significance after Mitigation

Significant impact

Impact WF-2: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment

Impact Discussion

Project Impacts. New development in designated fire hazard areas as proposed in the 2040 General Plan would require installation and maintenance of infrastructure such as roads, water tanks and electrical power lines. As shown by recent wildfires such as the Thomas Fire, some infrastructure, particularly electrical power lines, have the potential to exacerbate risk of wildfire under some conditions. This is considered a potentially significant impact.

Other impacts that could be caused by the construction of infrastructure, such as soil erosion, water pollution, disturbance of sensitive wildlife habitat, etc., are addressed in other topical sections of this EIR.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to wildland fire hazards.²⁰⁰ Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan, impacts would remain cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs

200 SCAG 2016-2040 RTP/SCS PEIR, p. 3.9-42



Level of Significance after Mitigation

Significant impact

Impact WF-3: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impact Discussion

Project Impacts. As noted under Impacts WF-1 and WF-2, new development in designated fire hazard areas as proposed in the 2040 General Plan could expose people and structures to risk of wildfire. As seen from recent wildfires such as the Thomas Fire, the destruction of vegetative cover and physical changes to soil due to intense heat can exacerbate slope instability, flooding and mudflows during rainstorms in burned areas. This is considered a potentially significant impact.

Cumulative Impacts. The RTP/SCS PEIR determined that the 2016-2040 RTP/SCS could result in significant cumulative impacts related to wildland fire hazards.²⁰¹ Although the proposed policies and programs would substantially reduce the incremental effects of implementation of the 2040 General Plan, impacts would remain cumulatively considerable.

Level of Significance

Potentially significant

Mitigation Measures

All feasible mitigation strategies have been incorporated into the proposed General Plan policies and programs

Level of Significance after Mitigation

Significant impact

²⁰¹ SCAG 2016-2040 RTP/SCS PEIR, p. 3.9-42

4. Environmental Setting and Impact Analysis
4.19 – Wildfire



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5. Alternatives Analysis

5.1 Introduction

5.1-1 CEQA Requirements

CEQA requires that an EIR "...shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives". The selection of alternatives and their discussion must "foster informed decision-making and public participation." (CEQA Guidelines §15126.6(a))

Other provisions guiding the selection and analysis of alternatives include the following:

- e) An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. (§15126.6(a))
- f) There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (§15126.6(a))
- g) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code §21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (§15126.6(b))
- h) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. (§15126.6(c))
- i) The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. ... Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i)



failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. (§15126.6(c))

- j) The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (§15126.6(d))
- k) The specific alternative of “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. (§15126.6(e)(1))
- l) The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published ... as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. (§15126.6(e)(2))
- m) If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (§15126.6(e)(2))
- n) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan. (§15126.6(e)(3)(A))
- o) After defining the “no project” alternative ... the lead agency should proceed to analyze the impacts of the “no project” alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. (§15126.6(e)(3)(C))
- p) The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen



any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. (§15126.6(f))

- q) Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site ... (§15126.6(f)(1))
- r) An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. (§15126.6(f)(3))

As reflected in these requirements, two major considerations are fundamental to the selection and analysis of alternatives:

- 1) Project Objectives. The selection of alternatives should focus on those that could feasibly attain most of the basic objectives; and
- 2) Reduced Impacts. The alternatives analyzed would avoid or substantially lessen the significant effects of the project.

5.1-2 Project Objectives

The selection of alternatives should focus on those that could feasibly attain most of the basic objectives. As noted in **Section 3.3** (page [3-4](#)), the City has established the following objectives for the 2040 General Plan Update:

- Establish a long-range vision to the 2040 General Plan horizon year that reflects the desires of the community as expressed in the 2050 SAVE OPEN-SPACE and AGRICULTURAL RESOURCES (SOAR) Land Use Measure approved by the voters on November 8, 2016;
- Adopt policies to guide City decisions regarding private land use and development and City infrastructure plans consistent with the regional population, housing and jobs forecast assumed in the 2040 Regional Transportation Plan/Sustainable Communities Strategy;
- Adopt updated transportation and mobility policies consistent with current State law, including Complete Streets, Safe Routes to School, and higher priority on reducing vehicle miles traveled rather than minimizing congestion;



- Preserve Santa Paula’s small-town character and compact neighborhoods;
- Promote the maintenance and enhancement of existing neighborhoods;
- Enhance the economic vitality and attractiveness of Downtown;
- Encourage land use and development patterns that preserve the character of the community, protect historic, cultural and environmental resources, minimize public safety hazards, promote healthy lifestyles and environmental justice, and expand economic opportunity for local residents and businesses;
- Encourage a full range of living options for residents of all ages and income levels, including urban townhouses and condominiums, rental apartments, move-up executive homes, senior and assisted living facilities, and accessory units;
- Enhance the City’s fiscal sustainability through higher property values, increased tourism and sales tax revenues, and the efficient use of land and infrastructure;
- Promote environmental sustainability and the City’s capacity to adapt successfully to climate change and other uncertainties; and
- Provide guidance for detailed plans and implementing actions, such as specific plans, the Development Code, subdivision regulations, design standards, capital improvement programs and City departmental procedures.

5.1-3 Significant Environmental Effects of the Proposed 2040 General Plan

Chapter 4 presents the detailed analysis of environmental effects of the proposed 2040 General Plan. Unavoidable significant effects that would be expected to result from adoption and implementation of the proposed Plan are summarized below.

Aesthetics

Impact AES-1: Substantial adverse effect on a scenic vista

Development under the 2040 General Plan would convert undeveloped areas to urban or suburban uses, particularly in the Adams Canyon and Fagan Canyon Expansion Areas, as these areas currently support only agriculture and/or open space. General Plan policies and programs identified in **Table 4.2-1** would help to enhance the visual character of development in undeveloped areas by encouraging cluster development, open space protection, and the use of natural materials. However, future development, particularly in the hill and canyon areas north of the city, would change the essential character of undeveloped areas from rural to suburban. This would be considered a significant impact to scenic vistas.



Impact AES-3: Degradation of the existing visual character or quality of public views of the site and its surroundings in non-urbanized areas; or conflict with applicable zoning and other regulations governing scenic quality in an urbanized area

Similar to Impact AES-1, conversion of undeveloped areas to urban or suburban uses, particularly in the Adams Canyon and Fagan Canyon Expansion Areas, would substantially change the visual character of these areas. Although the proposed General Plan policies and programs identified in **Table 4.2-1** would help to enhance the visual character of development, this impact would still be considered a significant.

Impact AES-4: Creation of a New Source of Substantial Light or Glare

Although the proposed policies and programs together with existing regulations such as Section 16.42.050 of the Development Code, which establishes standards for outdoor lighting, including lighting intensity and shielding to prevent light spillage onto adjacent properties, would substantially reduce potential impacts to the existing visual character or quality of the Planning Area, impacts are still considered to be significant due to the potential for urban development in Expansion Areas where no major sources of light and glare currently exist.

Agriculture and Forestry Resources

Impact AG-1: Convert Important Farmland to Non-Agricultural Use

Portions of the Adams Canyon and Fagan Canyon Expansion Areas support high-quality soils, mostly within their lower reaches and particularly in natural drainage areas. Since the precise location of future development within the Expansion Areas has not been established, prime soils within these areas could be impacted by future development. This is a potentially significant impact. While the General Plan policies listed in **Table 4.3-2** would substantially reduce this potential impact, they would not ensure the preservation of all important farmland; therefore, this would be considered a significant impact.

Air Quality and Greenhouse Gas Emissions

Impact AQ/GHG 2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard

Because the proposed 2040 General Plan is a long-term policy document and the timing of specific developments is not known, it is not possible to quantify short-term air pollutant emissions associated with construction activity. However, on a citywide basis it is possible that construction



emissions could exceed the significance thresholds established in the Ventura County Air Quality Assessment Guidelines.

Proposed 2040 General Plan policies that will help to reduce potential short-term impacts from construction are listed in **Table 4.4-9**. In addition, the control measures, regulations, incentives and smart growth policies established by VCAPCD will also substantially reduce these impacts. However, even with these measures, short-term impacts could be significant.

Impact AQ/GHG-3: Expose sensitive receptors to substantial pollutant concentrations

Diesel particulate matter (DPM) from heavy trucks along major highways could expose sensitive receptors to substantial pollutant concentrations. DPM emissions have been associated with acute (short-term) and chronic (long-term) health effects, such as the worsening of heart and lung diseases. In order to reduce exposure of sensitive populations to DPM, the California Air Resources Board (CARB) recommends that local governments avoid locating new sensitive land uses within 500 feet of freeways.

The SR-126 freeway is the roadway with the highest traffic volumes in Santa Paula. In comparison to other freeways in Southern California, traffic volumes on SR-126 are relatively low, and the majority of existing land uses on the south side of SR-126 in Santa Paula are commercial or industrial and are not considered sensitive receptors. However, residential neighborhoods are located adjacent to SR-126 between Shell Road and Steckel Drive. On the north side, a substantial portion of the land within 500 feet of the freeway from Peck Road to 13th Street is developed with residential neighborhoods. Although SR-126 is not considered to be a high-volume roadway, sensitive uses near the freeway may still experience elevated levels of air contaminants.

Table 4.4-9 lists proposed General Plan policies and programs that would substantially reduce potential exposure of sensitive receptors to pollutant concentrations along major roadways such as SR-126. However, since existing sensitive land uses would remain within 500 feet of SR-126 under the proposed Plan impacts would be considered significant and unavoidable.

Biological Resources

Impact BIO-1: Substantial adverse effect on a candidate, sensitive, or special status species

Policies in the proposed General Plan that would reduce potential impacts on special status species from future development are listed in **Table 4.5-1**. These policies and programs would be implemented through the City's development review process and regulatory permitting required by existing Federal and State laws regarding special status species of plants or animals. Although



these policies and programs would substantially reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas.

Impact BIO-2: Substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service

Future development under the proposed General Plan has the potential to impact these areas through direct disturbance as discussed under Impact BIO-1 above, and through invasion of exotic species into habitat areas, increased urban runoff containing pollutants, and impacts from increased human activity (such as encroachment into sensitive areas and impacts from increased lighting). Potential impacts would be substantially reduced through the proposed General Plan policies, as well as by provisions of the Municipal Code regarding control of lighting impacts as discussed in **Section 4.2, Aesthetics**. Although these policies and programs together with other requirements in the Municipal Code would substantially reduce impacts, development in the Adams and Fagan Canyon Expansion Areas could result in significant impacts due to the predominantly natural condition of these areas.

Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites

Development in the Expansion Areas could impact local movement pathways and migratory routes such as Adams and Fagan Barrancas, which provide connections to the Santa Clara River. While the proposed General Plan policies and programs would substantially reduce this impact, it would remain significant.

Hazards and Hazardous Materials

Impact HAZ-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport or within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The Airport Comprehensive Land Use Plan (CLUP) for Ventura County is intended to protect and promote the safety and welfare of residents near military and public use airports in the county, as well as airport users, while promoting the continued operation of those airports. The CLUP seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that structures and



activities do not encroach upon or adversely affect the use of navigable airspace. Air safety zones applicable to Santa Paula Airport are designated in the CLUP as shown in **Exhibit 4.9-1**.

To the west of the airport, the eastern portion of Rancho Santa Paula Mobile Home Park, which is located west of Steckel Drive and south of SR-126, is within the Outer Safety Zone. According to the CLUP, all residential uses are classified as Unacceptable within an Outer Safety Zone. Any existing structures or uses that were lawfully established or constructed prior to the adoption of the CLUP and that are inconsistent with current air safety zones are considered legal nonconforming uses and are subject to the regulations contained in Chapter 16.110 - Nonconformities of the Development Code (SPMC Title XVI). Those regulations are intended to encourage the city's continuing improvement by limiting the extent to which nonconforming structures and uses may continue to be used, expanded, or replaced, while improving the health, safety, and welfare of residents without creating an economic hardship for individual property or business owners. Conformance with Hazards and Public Safety Element Program HPS 5.d would help to facilitate the modification or replacement of nonconforming uses such as Rancho Santa Paula Mobile Home Park in order to reduce or eliminate incompatibilities with the CLUP. However, adoption of the General Plan would not ensure that this incompatibility will be eliminated. Therefore, this existing incompatibility is considered a significant adverse impact.

Noise

Impact N-1: Temporary increase in noise levels

During site preparation and construction, the use of heavy equipment could cause temporary noise that may affect sensitive uses near the construction site. In order to minimize disturbance, the City's Noise Ordinance (SPMC Chapter 93) limits the allowable hours of construction to between 8:00 a.m. and 6:00 p.m. Monday through Friday with limited exceptions such as emergency work. While the current Noise Ordinance and proposed General Plan policies would substantially reduce short-term noise impacts from development anticipated under the 2040 General Plan, it is possible that in some sensitive locations and circumstances, particularly infill development, such impacts could remain significant.

Impact N-2: Permanent increase in noise levels

Traffic is the major long-term source of unwanted noise in most areas of Santa Paula. There are 23 road segments where the projected 2040 noise level would exceed the "normally acceptable" level for the type of adjacent land use (shaded rows). In all but four of these segments the projected increase in noise level expected to occur by 2040 is less than 3 dB CNEL, which is typically not perceptible. However, because noise would exceed the level considered "normally acceptable" this is considered a potentially significant impact for purposes of General Plan analysis.



In three of the 23 road segments where the 2040 noise level is projected to exceed adopted standards the projected increase is greater than 5 dB CNEL. Although an increase of 5 dB would be perceptible to most people, this change would occur over a long period of time. However, because noise would exceed the level considered “normally acceptable” this is considered a potentially significant impact for purposes of General Plan analysis. In addition, one segment (Peck Road from the SR-126 eastbound ramps to its southern terminus) has a projected noise increase of greater than 5 dB CNEL. Although the projected 2040 noise level would not exceed standards and the increase would occur over a long period of time, this is also considered a potentially significant impact because a 5 dB increase would be perceptible to most people.

The 2040 General Plan includes policies and programs requiring new noise-sensitive uses located in areas where noise levels exceed “normally acceptable” levels to demonstrate that they have incorporated design features to reduce interior noise to acceptable levels. While these requirements would reduce potential noise impacts for new developments to a level that is less than significant, existing noise-sensitive uses may continue to be impacted by noise levels that exceed current standards. Over time, these uses may be remodeled or replaced with new structures incorporating noise mitigation. However, the continuing exposure of existing uses to noise levels that exceed current standards is considered to be a significant impact with no feasible mitigation available in the near term.

Impact N-3: Generation of excessive groundborne vibration or noise

Construction of new developments anticipated by the 2040 General Plan could generate ground-borne vibration and noise on and adjacent to construction sites. Long-term activities, such as heavy truck or rail traffic and some kinds of industrial operations, can also generate ground-borne vibration of varying degrees. Although the 2040 General Plan policies and programs would reduce potential impacts to a level that is less than significant in most cases, some types of activities such as construction requiring the use of pile drivers or compactors, particularly near historic buildings, could result in significant impacts even with adherence to these policies and programs.

Wildfire

Impact WF-1: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands

Portions of Santa Paula’s Expansion Areas (primarily Adams Canyon and Fagan Canyon) are located within Moderate, High and Very High Fire Hazard State Responsibility Areas, and some areas within the City limits and Sphere of Influence along the northern City boundary are



designated Very High Fire Hazard Local Responsibility Areas or Moderate, High or Very High Fire Hazard State Responsibility Areas. Policies and programs in the proposed General Plan would require new developments within fire hazard areas to include effective mitigation to minimize wildland fire risks. However, even with implementation of these policies and programs, existing uses and proposed new development within the Very High Fire Hazard zones is considered an unavoidable significant impact.

Impact WF-2: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment

New development in designated fire hazard areas as proposed in the 2040 General Plan would require installation and maintenance of infrastructure such as roads, water tanks and electrical power lines. As shown by recent wildfires such as the Thomas Fire, some infrastructure, particularly electrical power lines, have the potential to exacerbate risk of wildfire under some conditions. This is considered a significant impact.

Impact WF-3: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

New development in designated fire hazard areas as proposed in the 2040 General Plan could expose people and structures to risk of wildfire. As seen from recent wildfires such as the Thomas Fire, the destruction of vegetative cover and physical changes to soil due to intense heat can exacerbate slope instability, flooding and mudflows during rainstorms in burned areas. This is considered a significant impact.

5.2 Selection of Alternatives for Analysis

This section describes the alternatives the City has identified for evaluation as well as other potential alternatives that were considered but ultimately not selected for analysis in this EIR.

5.2-1 Alternatives Selected for Analysis

The following alternatives have been selected for analysis in this EIR:

1. No Project. CEQA requires the evaluation of the No Project Alternative. The purpose of describing and analyzing a No Project alternative is to allow decision-makers to compare the impacts of approving the Proposed Project with the impacts of not



approving the project (Guidelines §15126.6(e)). When the Proposed Project is the revision of an existing land use or regulatory plan, the No Project alternative will be the continuation of the existing plan or regulation into the future. Guidelines §15126.6(e)(3)(C) states that the Lead Agency should analyze the impacts of the No Project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Consistent with these requirements, the No Project alternative analyzed in **Section 5.3-1**, below, compares the environmental effects of future development consistent with the current General Plan to development as proposed in the 2040 General Plan.

2. Development within the current Sphere of Influence. The current General Plan Land Use Element, which was last amended in 2014 (City Council Resolution No. 6868), identifies the Adams Canyon and Fagan Canyon Expansion Areas as part of the City's Sphere of Influence (SOI). On February 21, 2018 Ventura LAFCo adopted Resolution 18-02S amending the SOI to remove approximately 7,586 acres that comprise the Adams Canyon and Fagan Canyon Expansion Areas. Under this alternative, future urban development would be limited to the territory within the current SOI and only limited development consistent with the County General Plan and zoning (e.g., large-lot residential and agricultural buildings) would occur in the Adams Canyon or Fagan Canyon Expansion Areas. Policies, programs and land use designations for other areas would be the same as for the proposed 2040 General Plan.

This alternative is selected for analysis because it could potentially attain most of the basic objectives of the project while avoiding or substantially lessening some of the significant effects of the proposed 2040 General Plan in areas such as aesthetics, agricultural resources, biological resources and wildland fire hazards. This alternative is discussed further in **Section 5.3-2** below.

5.2-2 Alternatives Considered but Not Selected for Further Analysis

Table 5.2-1 summarizes the potential alternatives that were considered in the preliminary evaluation process, along with the City's rationale for including or rejecting each potential alternative in the EIR analysis.



Table 5.2-1 Preliminary Evaluation of Potential Alternatives

Potential Alternative	Preliminary Evaluation	Carried Forward to the Alternatives Evaluation?
1. No Project	Required by CEQA. This alternative is evaluated as Alternative 1.	Yes
2. Development within the 2018 Sphere of Influence	Development in the Adams Canyon and Fagan Canyon expansion areas could result in significant impacts in the areas of aesthetics, agricultural resources, biological resources and wildland fire hazards. Restricting urban development to areas within the current SOI could substantially reduce these impacts. This alternative is evaluated as Alternative 2.	Yes
3. Alternate location for the Project	CEQA requires that the discussion of alternatives focus on feasible alternatives to the project or its location that could avoid or substantially lessen any significant effects of the project. The proposed Project is a General Plan update for the City of Santa Paula, and the City does not have authority to regulate land use outside of the City boundaries. Therefore, moving the Project to an alternative location would not be feasible.	No

Section 5.3 below summarizes the environmental impacts of the two alternatives that were carried forward from the preliminary screening process. Each alternative is compared to the Proposed Project and an assessment is made as to whether the impacts of the alternative would be similar, greater, or less than the impacts that would result from the Proposed Project. **Section 5.4** beginning on page [5-22](#) summarizes the alternatives evaluation and identifies the environmentally superior alternative.

Level of Detail for the Alternatives Analysis

Guidelines §15126.6(d) states that “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” Consistent with this guidance, the level of detail for analysis of environmental impacts of alternatives is comparative and qualitative and is less specific than the level of detail presented for the Proposed Project in **Chapter 4 – Environmental Setting and Impact Analysis**.



Environmentally Superior Alternative

An EIR must identify an “environmentally superior” alternative among those examined, and where the No Project Alternative is identified as environmentally superior, the EIR must identify an environmentally superior alternative from the other alternatives. The environmental impacts of each alternative are compared to the Proposed Project and evaluated as to whether their impacts would be similar to the Proposed Project, greater, or less than the Proposed Project.

As discussed below in **Section 5.4**, Alternative 2 (Development Within the Current Sphere of Influence) has been identified as the environmentally superior alternative. However, it would be less likely to meet basic project objectives of providing a full range of living options for residents of all ages and income levels, including move-up executive homes, and could be less likely to enhance the City’s fiscal sustainability through higher tax revenues. Due to the reduction in potential housing units in the Adams Canyon and Fagan Canyon Expansion Areas, this alternative could also hinder residential development consistent with the regional population and housing forecast assumed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy as compared to the proposed 2040 General Plan.

Criteria for Decision-Making

The purpose of an EIR is to foster informed decision-making. The final decision-maker for the Proposed Project is the Santa Paula City Council. The environmental analysis presented in this EIR represents one important consideration in the City Council’s decision-making process; however, other factors may also be considered in its deliberations, such as economic and social considerations that are not within the purview of CEQA. In determining whether to approve the Proposed 2040 General Plan, the City Council must consider the environmental information presented in this EIR, including the analysis of alternatives. If the alternative selected would result in significant adverse environmental impacts, the City must also adopt a Statement of Overriding Considerations explaining why those impacts are acceptable when balanced against other City objectives.



5.3 Analysis of Alternatives

5.3-1 Alternative 1: No Project

Under Alternative 1, future development would continue to be regulated by the existing General Plan. It is assumed that the amount and location of new development would be substantially similar to the Proposed Plan.

Aesthetics

Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the significant impacts of this alternative would be similar to the impacts identified for the Proposed Plan (impacts on a scenic vista and degradation of the existing visual character) because development would occur in the Expansion Areas. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Agriculture and Forestry Resources

Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the significant impacts of this alternative would be similar to the impacts identified for the Proposed Plan (conversion of important farmland to non-agricultural use) because development could occur in the Expansion Areas. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Air Quality and Greenhouse Gas Emissions

Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the significant impacts of this alternative would be similar to the impacts identified for the Proposed Plan (short-term air pollutant emissions associated with construction activity and substantial pollutant concentrations along major highways) because the amount and location of development would be similar to the Proposed Project. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Biological Resources

The Proposed Plan would result in conversion of some natural open space in the Adams and Fagan Canyon Expansion Areas to urban uses, which is considered to be a significant impact. Under the No Project alternative, development in these areas would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts



identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Cultural Resources

No significant impacts to cultural resources were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Energy

No significant impacts to energy were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Geology and Soils

No significant impacts to geology and soils were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Hazards and Hazardous Materials

Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the significant impacts of this alternative would be similar to the impacts identified for the Proposed Plan (aircraft safety) because the amount and location of development would be similar to the Proposed Project. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Hydrology and Water Quality

No significant impacts to hydrology and water quality were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.



Land Use and Planning

No significant impacts to land use and planning were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. The Proposed Plan incorporates the amended Sphere of Influence adopted by LAFCo in 2018; however, under the current General Plan development in the Adams Canyon and Fagan Canyon Expansion Areas could proceed upon approval of an amendment to the SOI in conjunction with an annexation application. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Noise

Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the significant impacts of this alternative would be similar to the impacts identified for the Proposed Plan (existing uses that are exposed to noise levels in excess of current standards and temporary construction noise and vibration) because the amount and location of development would be similar to the Proposed Project. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Population and Housing

No significant impacts to population and housing were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Public Services

No significant impacts to public services were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.



Recreation

No significant impacts to recreation were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Transportation

No significant impacts to transportation were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan; however, the proposed change in the Level of Service standard from C to D and the reclassification of a segment of Palm Avenue from 2 to 4 lanes would result in the elimination of roadway segments where the LOS does not meet the City standard. Therefore, while the amount of traffic generated under the No Project alternative would be similar to the Proposed Plan, impacts would be greater than for the Proposed Plan because this alternative would not comply with the current LOS C standard in several road segments.

Utilities and Service Systems

No significant impacts to utilities and service systems were identified for the Proposed Plan. Under this alternative, the amount and location of new development would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.

Wildfire

Portions of Santa Paula's Expansion Areas (primarily Adams Canyon and Fagan Canyon) as well as some areas within the current City limits along the northern City boundary are within designated wildland fire hazard areas. This is considered an unavoidable significant impact. Under the No Project alternative, the amount new development in fire hazard areas would be similar to the Proposed Plan. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan. The No Project alternative would not eliminate or substantially reduce significant impacts of the Proposed Project.



5.3-2 Alternative 2: Development within the Current Sphere of Influence

Under this alternative, urban development would be limited to areas within the Sphere of Influence (SOI) as adopted by LAFCo in 2018. The major difference between this alternative and the Proposed Plan is that urban development as described in the draft Land Use Element would not occur in Adams Canyon or Fagan Canyon because those areas would remain in unincorporated Ventura County. It should be noted that if the Adams Canyon and Fagan Canyon Expansion Areas are not annexed to the City of Santa Paula, many types of development would still be permitted under County land use regulations. Under the current County General Plan, the majority of the Adams and Fagan Canyon areas are designated *Open Space-Urban Reserve* (10 acre minimum) while a small portion is designated *Agricultural-Urban Reserve* (40 acre minimum). Therefore, under this alternative the Adams and Fagan Canyon Expansion Areas could potentially be subdivided into large lots. Under current County zoning regulations, a variety of structures and uses are allowed in the Open Space and Agriculture zones, including agricultural service and storage facilities, packing houses, wineries, single-family homes (one per lot), accessory structures such as barns, farmworker housing complexes, residential care facilities, boarding houses, bed and breakfast inns, and equestrian centers. Together, Adams and Fagan Canyons encompass nearly 7,600 acres, which if subdivided into 10- to 40-acre parcels could potentially result in construction of a substantial number of new housing units and other structures contingent upon County review and approval. Such large-lot development could result in impacts similar to the Proposed Project depending on the number of lots created and the nature of development; however, such impacts are highly speculative.

Aesthetics

Under this alternative, the significant impacts identified for the Proposed Plan (impacts on a scenic vista and degradation of the existing visual character) would likely be reduced but not entirely eliminated because large-lot development could occur in the Adams and Fagan Canyon Expansion Areas.

Agriculture and Forestry Resources

Under this alternative, the significant impacts identified for the Proposed Plan (conversion of important farmland to non-agricultural use) would be reduced but not eliminated because urban development would not occur in the Adams and Fagan Canyon Expansion Areas where some important farmland exists. However, impacts would still occur in other areas within the SOI where important farmland exists.



Air Quality and Greenhouse Gas Emissions

Under this alternative, the significant impacts identified for the Proposed Plan (short-term air pollutant emissions associated with construction activity and substantial pollutant concentrations along major highways) would be marginally reduced as a result of reduced development in the Adams and Fagan Canyon Expansion Areas. These impacts would still be considered significant, however.

Biological Resources

With the Proposed Project, significant impacts to sensitive biological resources could occur in the Adams and Fagan Canyon Expansion Areas. Under this alternative urban development would not occur in those areas; therefore, this alternative would reduce but not eliminate these impacts since large-lot development could still occur.

Cultural Resources

No significant impacts to cultural resources were identified for the Proposed Plan. However, under Alternative 2 new urban development would not occur in the Adams Canyon and Fagan Canyon Expansion Areas where sensitive cultural resources could exist. Therefore, while this alternative would not avoid any significant impacts, it is considered to be superior to the Proposed Project with respect to cultural resources.

Energy

No significant impacts to energy were identified for the Proposed Project. Under this alternative, urban development would not occur in the Adams and Fagan Canyon Expansion Areas where low-density development would require the extension of infrastructure such as roads and utility lines and lead to greater trip lengths. Therefore, while this alternative would not avoid any significant impacts, it is considered to be superior to the Proposed Project with respect to energy.

Geology and Soils

No significant impacts to geology and soils were identified for the Proposed Plan. However, under Alternative 2 urban development would not occur in the Adams Canyon and Fagan Canyon Expansion Areas where steep hillsides and potentially unstable soils exist. Large-lot development under Ventura County regulations could result in potential geologic hazards, however. While this alternative would not avoid any significant impacts, it is considered to be superior to the Proposed Project with respect to geology and soils because it would likely result in less total ground disturbance.



Hazards and Hazardous Materials

Significant impacts related to air safety hazards were identified for the Proposed Plan due to the presence of existing residences within an air safety zone. This alternative would have the same impacts because the land use pattern near the airport would be the same as with the Proposed Plan. Therefore, the impacts of this alternative would be the same as for the Proposed Plan.

Hydrology and Water Quality

No significant impacts to hydrology and water quality were identified for the Proposed Plan. However, under Alternative 2 new urban development would not occur in the Adams Canyon and Fagan Canyon Expansion Areas where steep hillsides would increase the potential for soil erosion due to development activity. Therefore, while this alternative would not avoid any significant impacts, it is considered to be superior to the Proposed Project with respect to hydrology and water quality because potential large-lot development would likely result in less total ground disturbance.

Land Use and Planning

No significant impacts to land use and planning were identified for the Proposed Plan. Alternative 2 would be consistent with the amended Santa Paula SOI adopted by LAFCo in 2018; however, the Adams Canyon and Fagan Canyon Expansion Areas are within the CURB, which was reconfirmed by Santa Paula voters in 2016 as part of the SOAR initiative. Under Ventura LAFCo policies the SOI is intended to apply to areas where development is anticipated within five years. Since the Proposed 2040 General Plan has a time horizon of 20+ years, an inconsistency between the SOI and the Expansion Areas is not considered to be a significant impact because an amendment to the SOI could be processed concurrently with the annexation of an Expansion Area.

One of the objectives of the Proposed Project is to facilitate development consistent with the 2016-2040 RTP/SCS growth forecast. The reduction of potential housing units in the Adams and Fagan Canyon Expansion Areas could make it more difficult for the city to accommodate the level of residential development assumed in the RTP/SCS by 2040. Therefore, Alternative 2 is considered to be inferior to the Proposed Project with respect to land use and planning.



Noise

Significant impacts to existing uses that are exposed to roadway noise levels in excess of current standards were identified for the Proposed Project. This alternative would not alter the existing land uses that are impacted by roadway noise; therefore, the impacts for this alternative would be similar to those identified for the Proposed Plan.

Population and Housing

No significant impacts related to population and housing were identified for the Proposed Plan. As with the Proposed Plan, Alternative 2 would not induce substantial population growth or displace substantial numbers of housing units or people. Therefore, impacts of this alternative would be similar to the impacts identified for the Proposed Plan.

Public Services

No significant impacts regarding public services were identified for the Proposed Plan. Under Alternative 2, the amount of new development requiring public services in Adams Canyon and Fagan Canyon would likely be less than the Proposed Plan. Therefore, the impacts of this alternative would be less than the impacts identified for the Proposed Plan.

Recreation

No significant impacts regarding recreation were identified for the Proposed Plan. Under Alternative 2, the total amount of new development requiring recreation facilities and services would likely be somewhat less than the Proposed Plan. However, new recreational facilities called for in the Adams and Fagan Canyon areas also would not be provided. Therefore, the impacts of this alternative would be considered similar to the impacts identified for the Proposed Plan.

Transportation

No significant impacts related to transportation were identified for the Proposed Plan. Under Alternative 2, the total amount of traffic generated by new development would be marginally less than the Proposed Plan. Therefore, the impacts of this alternative on vehicular traffic would be similar to the impacts identified for the Proposed Plan. Two trails identified in the Bicycle Facilities Plan (**Exhibit 4.17-19**) extend into the Adams Canyon and Fagan Canyon Expansion Areas. Without annexation and residential development in these areas, it is much less likely that those trails would be constructed because they could not be required as a condition of development. However, without new residential development in those areas there also would be less demand for those trails. Therefore, impacts of this alternative are considered to be similar to the Proposed Plan.



Utilities and Service Systems

No significant impacts to utilities and service systems were identified for the Proposed Plan. Under Alternative 2, the amount of new development requiring utilities would likely be somewhat less than the Proposed Plan. However, the new infrastructure required to serve proposed development in Adams and Fagan Canyons would be installed by developers as part of the projects. Therefore, the impacts of this alternative would be similar to the impacts identified for the Proposed Plan.

Wildfire

Portions of Santa Paula's Expansion Areas (primarily Adams Canyon and Fagan Canyon) as well as some areas within the current City limits along the northern City boundary are within designated wildland fire hazard areas. This is considered an unavoidable significant impact of the Proposed Plan. Under this alternative, development in the fire hazard areas of Adams and Fagan Canyons would be substantially reduced. Therefore, this alternative would be environmentally superior to the Proposed Plan.

5.4 Summary and Comparison of Alternatives

Table 5.4-1 summarizes the above analysis. This table shows whether each alternative's environmental impact is superior, inferior, or similar to the Proposed Project for each issue area.

Table 5.4-1 Alternatives Comparison

Issue	Alternative 1: No Project	Alternative 2: Development in the Existing SOI
Aesthetics	=	+
Agriculture and Forestry Resources	=	+
Air Quality and Greenhouse Gas Emissions	=	+
Biological Resources	=	+
Cultural and Tribal Resources	=	+
Energy	=	+
Geology and Soils, and Mineral Resources	=	+
Hazards and Hazardous Materials	=	=
Hydrology and Water Quality	=	+
Land Use and Planning	=	-
Mineral Resources	=	=
Noise	=	=
Population and Housing	=	=
Public Services	=	+
Recreation	=	=
Transportation	-	=
Utilities and Service Systems	=	=



Issue	Alternative 1: No Project	Alternative 2: Development in the Existing SOI
Wildfire	=	+
Overall	=	+/-
Legend: - Inferior to the Proposed Project + Superior to the Proposed Project +/- Characteristics both better and worse than the Proposed Project = Similar to the Proposed Project		

The comparison indicates that Alternative 1 (No Project) would result in impacts that are similar to the Proposed Project for most topics. With regard to transportation, the No Project Alternative would result in conflicts with adopted policies because several road segments would not meet the current LOS C standard. This alternative would also be less likely to meet project objectives regarding consistency with the 2016-2040 RTP/SCS, transportation/mobility, economic development and revitalization of Downtown (**Table 5.4-2**).

Alternative 2 would avoid or reduce impacts in several topical areas because it would substantially reduce development in the Adams and Fagan Canyon Expansion Areas, which are predominantly agricultural and open space uses. However, this alternative would make it more difficult for the city to accommodate the level of residential development assumed in the 2016-2040 RTP/SCS due to the elimination of 945 potential housing units in the Adams and Fagan Canyon Expansion Areas. In addition, this alternative would significantly reduce opportunities for move-up housing. For these reasons, this alternative is considered the environmentally superior alternative. However, it would not meet several of the project objectives.

Table 5.4-2 Ability of Alternatives to Meet Project Objectives

Project Objective	Proposed Project	Alternative 1: No Project	Alternative 2: Development in the Existing SOI
Establish a long-range vision to the 2040 General Plan horizon year that reflects the desires of the community as expressed in the 2050 SAVE OPEN-SPACE and AGRICULTURAL RESOURCES (SOAR) Land Use Measure approved by the voters on November 8, 2016	Yes	Yes	Yes, but not to the same extent since it would not allow development consistent with SOAR
Adopt policies to guide City decisions regarding private land use and development and City infrastructure plans consistent with the regional population, housing and jobs forecast assumed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy	Yes	Yes, but not to the same extent since it does not include growth projections to 2040	Yes, but not to the same extent because it would reduce potential housing units in Adams and Fagan Canyons

5. Alternatives Analysis
5.4 – Summary and Comparison of Alternatives



Project Objective	Proposed Project	Alternative 1: No Project	Alternative 2: Development in the Existing SOI
Adopt updated transportation and mobility policies consistent with current State law, including Complete Streets, Safe Routes to School, and higher priority on reducing vehicle miles traveled rather than minimizing congestion	Yes	No – the existing General Plan does not address these issues	Yes
Preserve Santa Paula's small-town character and compact neighborhoods	Yes	Yes	Yes
Promote the maintenance and enhancement of existing neighborhoods	Yes	Yes	Yes
Enhance the economic vitality and attractiveness of Downtown	Yes	No – the existing General Plan does not include new policies emphasizing Downtown revitalization	Yes
Encourage land use and development patterns that preserve the character of the community, protect historic, cultural and environmental resources, minimize public safety hazards, promote healthy lifestyles and environmental justice, and expand economic opportunity for local residents and businesses	Yes	Yes	Yes
Encourage a full range of living options for residents of all ages and income levels, including urban townhouses and condominiums, rental apartments, move-up executive homes, senior and assisted living facilities, and accessory units	Yes	Yes	Yes, but not to the same extent since it would reduce potential new housing units in Adams and Fagan Canyons
Enhance the City's fiscal sustainability through higher property values, increased tourism and sales tax revenues, and the efficient use of land and infrastructure	Yes	Yes, but not to the same extent since it does not include new policies emphasizing economic development	Yes
Promote environmental sustainability and the City's capacity to adapt successfully to climate change and other uncertainties	Yes	Yes, but not to the same extent since it does not include some new policies promoting sustainability	Yes
Provide guidance for detailed plans and implementing actions, such as specific plans, the Development Code, subdivision regulations, design standards, capital improvement programs and City departmental procedures	Yes	Yes	Yes



6. Significant Irreversible Environmental Changes

The CEQA Guidelines require that an EIR discuss “significant irreversible environmental changes which would be caused by the proposed project should it be implemented.” §15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Adoption and implementation of the 2040 General Plan would cause the following significant irreversible changes:

- a. Land uses and developments consistent with the 2040 General Plan would result in construction activities requiring the use of energy (both renewable and non-renewable) and natural resources such as lumber, minerals, and water. Use of these resources in Santa Paula would reduce their availability for other uses in the future as well as in other locations.
- b. The 2040 General Plan would facilitate increased population and employment in Santa Paula. While projected growth would be consistent with regional plans and forecasts, it would nevertheless contribute additional emissions and greenhouse gases in the region.
- c. Development of natural areas would reduce the amount of biological habitat and open space.
- d. Development according to the 2040 General Plan would require an increase in public facilities and services such as parks, schools, police and fire protection, roads and utilities.

6. Significant Irreversible Environmental Changes
5.4 – Summary and Comparison of Alternatives



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7. Growth-Inducing Impacts

The CEQA Guidelines require that an EIR discuss the growth-inducing impact of the proposed project. §15126.2(d) states:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The intent of the proposed 2040 General Plan is to establish Santa Paula's desired plan for growth over the next two decades. Therefore, unlike an EIR for individual development project, this primary purpose of this EIR is to comprehensively evaluate the reasonably foreseeable environmental growth-inducing effects of the Plan.

By establishing the desired types and locations for land uses, roads and other public facilities the 2040 General Plan intentionally fosters economic, population and housing growth in Santa Paula. As previously described in **Section 4.11**, the 2040 General Plan is consistent with the growth assumptions contained in the 2016-2040 RTP/SCS. Environmental impacts expected to result from the desired growth pattern are analyzed throughout this EIR, and the unavoidable significant effects are summarized in **Section 5.1-3**, above.



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8. Cumulative Impacts

CEQA requires that an EIR examine cumulative impacts as well as impacts of the project itself. As discussed in CEQA Guidelines §15130(a)(1), a cumulative impact “consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.” The analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall “reflect the severity of the impacts and their likelihood of occurrence” (CEQA Guidelines §15130(b)).

CEQA Guidelines §15130(b)(1) directs that the analysis of cumulative impacts should be based on either:

- A) A list of past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The proposed Project evaluated in this EIR is an update to the City’s General Plan. The EIR identifies reasonably foreseeable impacts within the Santa Paula Area of Interest, as shown in **Exhibit 3.2-2**, and the cumulative impact analysis is based on the summary of projections method. For most environmental topics, the geographic scope of cumulative impacts is the SCAG region and the analysis of cumulative impacts presented in the SCAG 2016-2040 RTP/SCS Program EIR is incorporated by reference pursuant to CEQA Guidelines §15130(d), which states:

- (d) Previously approved land use documents, including, but not limited to, general plans, specific plans, regional transportation plans, plans for the reduction of greenhouse gas emissions, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project



8. Cumulative Impacts

is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in section 15152(f), in a certified EIR for that plan.

The environmental analysis presented in **Chapter 4** of this EIR includes a discussion of cumulative impacts that would be anticipated to occur based upon the level of growth assumed in the proposed 2040 General Plan and adopted regional plans, as well as a determination of whether impacts of the 2040 General Plan would be cumulatively considerable.



9. Organizations and Persons Consulted

City of Santa Paula

Daniel Singer, City Manager
Steven McLean, Police Chief
Clete Saunier, Public Works Director
Tai P. Chau, P.E., Assistant Public Works Director/City Engineer
Caesar Hernandez, Regulatory Compliance Specialist, Public Works Department

County of Ventura

Laurie Crain, Permit Engineer, Ventura County Watershed Protection District

Ventura County Fire Department

Celine Moomey, Pre Fire Specialist

California Department of Forestry and Fire Protection (CAL FIRE)

Captain Gene Potkey, Office of the State Fire Marshal/Land Use Planning Program



9. Organizations and Persons Consulted

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10. EIR Preparers

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10. EIR Preparers

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